

RADIOACTIVE EFFLUENTSLIQUID RADWASTE TREATMENT SYSTEMLIMITING CONDITION FOR OPERATION

3.11.1.3 The Liquid Radwaste Treatment System shall be OPERABLE and appropriate portions of the system shall be used to reduce releases of radioactivity when the projected doses due to the liquid effluent, from each unit, to UNRESTRICTED AREAS (see Figure 5.1-4) would exceed 0.06 mrem to the total body or 0.2 mrem to any organ in a 31-day period.

APPLICABILITY: At all times.

ACTION:

- a. With radioactive liquid waste being discharged without treatment and in excess of the above limits and any portion of the Liquid Radwaste Treatment System not in operation, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days pursuant to Specification 6.9.2 a Special Report that includes the following information:
 1. Explanation of why liquid radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems, and the reason for the inoperability,
 2. Action(s) taken to restore the inoperable equipment to OPERABLE status, and
 3. Summary description of action(s) taken to prevent a recurrence.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.3.1 Doses due to liquid releases from each unit to UNRESTRICTED AREAS shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM when water streams are being released without being processed by its Radwaste Treatment System.

4.11.1.3.2 The installed Liquid Radwaste Treatment System shall be demonstrated OPERABLE by meeting Specifications 3.11.1.1 and 3.11.1.2.

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RADIOACTIVE EFFLUENTSGASEOUS RADWASTE TREATMENT SYSTEMLIMITING CONDITION FOR OPERATION

3.11.2.4 The VENTILATION EXHAUST TREATMENT SYSTEM and the WASTE GAS HOLDUP SYSTEM shall be OPERABLE and appropriate portions of these systems shall be used to reduce releases of radioactivity when the projected doses in 31 days due to gaseous effluent releases, from each unit, to areas at and beyond the SITE BOUNDARY (see Figure 5.1-3) would exceed:

- a. 0.2 mrad to air from gamma radiation, or
- b. 0.4 mrad to air from beta radiation, or
- c. 0.3 mrem to any organ of a MEMBER OF THE PUBLIC.

APPLICABILITY: At all times.

ACTION:

- a. With radioactive gaseous waste being discharged without treatment and in excess of the above limits, in lieu of a Licensee Event Report, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that includes the following information:
 - 1. Identification of any inoperable equipment or subsystems, and the reason for the inoperability,
 - 2. Actions(s) taken to restore the inoperable equipment to OPERABLE status, and
 - 3. Summary description of actions(s) taken to prevent a recurrence.
- b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.4.1 Doses due to gaseous releases from each unit to areas at and beyond the SITE BOUNDARY shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM when gaseous streams are being released without being processed by its Radwaste Treatment System.

4.11.2.4.2 The installed Gaseous Radwaste Treatment System shall be demonstrated OPERABLE by meeting Specifications 3.11.2.1 and 3.11.2.2 or 3.11.2.3.

Attachment II

Justification and Safety Analysis

The current Technical Specification 3.11.1.3 requires that liquid effluents be treated prior to release to unrestricted areas in order to reduce the radioactivity releases to these areas. The proposed modifications of the Technical Specifications seek to clarify that the dose projections due to liquid radwaste releases are required only when untreated liquid effluents are discharged to the unrestricted areas. Once effluents have been treated, further treatment would not reduce levels of radioactivity. No dose projections are needed provided that the liquid radioactive effluents released to the unrestricted areas have been treated. The proposed Technical Specification modifies surveillance requirement 4.11.1.3.1 to reflect the fact that no dose projections are required for liquid effluents which have been treated prior to being discharged.

A similar situation exists concerning Technical Specification 3.11.2.4. The gaseous effluents are required to be treated prior to being released whenever projected doses due to gaseous effluents at or beyond the site boundary exceed the limits prescribed in specification 3.11.2.4 for a 31 day period. The associated surveillance requirement 4.11.2.4.1 needs clarification. Whenever the gaseous effluents are treated prior to being released, pretreatment ensures that the doses at or beyond the site boundary would not exceed limits prescribed in specification 3.11.2.4. The proposed Technical Specifications reflect this fact in surveillance requirement 4.11.2.4.1 that no dose projections are required for gaseous effluents which have been treated prior to being released.

The proposed changes to the Technical Specifications provide a needed clarification for the surveillance requirements 4.11.1.3.1 and 4.11.2.4.1. The proposed changes would not have any impact on the routine releases from McGuire Nuclear Station and would not decrease the effectiveness of the surveillance. The proposed changes do not have any adverse implications for the health and safety of the public.

Attachment III

Analysis of Significant Hazards Consideration

Pursuant to requirements of 10CFR50.91, this analysis provides a determination that the proposed modifications of the Technical Specifications do not involve any significant hazards consideration, as defined by 10CFR50.92.

The proposed changes to the Technical Specifications supply a needed clarification to the surveillance requirements 4.11.1.3.1 and 4.11.2.4.1. The proposed changes concern a clarification of the requirements for the preparation of dose projections for routine power plant releases to the environment. The proposed changes do not affect the amount of radioactivity released to the environment, therefore the changes involve no safety consideration.

The proposed amendments would not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated; or
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated; or
- 3) Involve a significant reduction in a margin of safety.

Based upon the preceding analysis, Duke Power Company concludes that the proposed amendments do not involve a significant hazards consideration.