Long Island Lighting Company

Operating License NPF-36 Docket 50-322 License Change Application 3

The License Change Application requests modifications to Operating License NPF-36 for the Shoreham Nuclear Power Station

- 1.) To eliminate the necessity of performing a sampling analysis if no waste batch is released during the month.
- To correct an error in the basis for the location of the milk control sample.

Long Island Lighting Company

Bv

John D. Leonard, Jr.

Vice President

Nuclear Operations

Subscribed and sworn to before me this 20 day of January 1986.

LINDA A. CRATTY
NOTARY PUBLIC, State of New York
No. 4816267
Qualified in Suffolk County
Commission Expires March 30, 1986

My Commission Expires:

Notary Public of New York

March 30,1986

1.0 LICENSE CHANGE APPLICATION 3 The following changes to the Facility Operating License NPF-36 are requested in order to: eliminate unnecessary waste batch sampling correct an error in the basis for locating the milk control sample. 2.0 DESCRIPTION OF CHANGES 2.1 Radioactive Liquid Waste Sampling Add a footnote to Table 4.11.1.1-1 which states, "If a batch is released during the month." (See Attachment I). 2.2 Milk Sample Control Locat'on Revise the description of the location of the milk sample control location in Table 3.12.1-1 Part 4a from "not in the least prevalent wind directions" to "not in a direction prevalently downwind from the plant." (See Attachment II) REASON FOR CHANGES 3.1 Radioactive Liquid Waste Sampling The intent of the Technical Specification 3/4.11.1 is to ensure that: 1) All liquid effluents that potentially have concentrations of radioactive materials are monitored and: liquid effluents discharged to unrestricted areas do not have concentrations of radioactive materials that would contravene dose limits prescribed in 10CFR50, App. I. The addition of the proposed footnote does not alter the intent of the Technical Specification. If at least one batch is discharged during the month, a sample of dissolved and entrained gases is taken from the batch and analyzed. However, if no discharges are made during the month from a particular tank or sump, there is no reason to collect and analyze a sample from the tank or sump for that time period. If there is no discharge, the potential for exposing individuals in unrestricted areas has been precluded. The elimination of taking an unnecessary sample also serves the principle of ALARA by preventing the potential exposure of employees for unwarranted purposes. - 1 -

3.2 Milk Sample Control Location The current wording of the Technical Specifications allows the placement of the control milk sample location in a prevailing downwind sector from the plant. This placement would violate the concept of "control", which should represent the background or normal conditions and not be affected by plant operations. The proposed wording would require the control location to not be sited in a direction predominantly downwind of the plant. 4.0 SIGNIFICANT HAZARDS ANALYSES 4.1 Radioactive Liquid Waste Sampling Does the change involve a significant increase in the probability or consequences of an accident? These changes do not involve a significant increase in the probability or consequence of an accident because: The change is administrative in nature, serving to clarify a Technical Specification requirement. 2) No changes in sampling routine will result from this clarification. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated? This change does not create the possibility of a new or different kind of accident from any accident previously evaluated because: Samples will be collected and analyzed prior to the release of each batch as before. Does the change involve a significant reduction in margin of safety? This change does not involve a significant reduction in a margin of safety because: The change does not affect the functionality or integrity of any safety-related systems. - 2 -

4.2 Milk Sample Control Location Does the change involve a significant increase in the probability or consequences of an accident? The change is a clarification and does not delete A1: or change the sampling scheme now in effect. Does the change create the possibility of a new or 02: different kind of accident from any accident previously evaluated? A2: The change will reflect more accurately the intent of NUREG-0475 in locating the control sampling points. Does the change involve a significant reduction in margin of safety? The change does not affect the functionality or integrity of any safety-related systems. 5.0 TIMING OF CHANGE 5.1 Liquid Radioactive Waste Sampling Since this is an administrative change, it will become effective upon issuance of the revised Technical Specifications. 5.2 Milk Sample Control Location Since this is an administrative change, it will become effective upon issuance of the revised Technical Specifications. - 3 -