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C301-97 2016

May 30, 1997

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Subject: Saxton Nuclear Experimental Corporation Facility  
Operating License No. DPR-4  
Docket No. 50-146  
SNEC Facility Response to the Request for Additional Information Regarding  
Technical Specification Change Request 59

Enclosed is the GPU Nuclear response to the April 8, 1997 NRC request for additional information regarding Technical Specification Change Request (TSCR) 59. In accordance with 10 CFR 50.4(b)(1), also enclosed are revised pages to TSCR 59 which include revision to the original text based upon the responses provided herein. Revisions to the proposed Technical Specifications sections included with the question responses were reviewed and determined to have no effect on the evaluation and no significant hazards consideration provided with the submittal of TSCR 59 on November 25, 1996.

Pursuant to 10 CFR 50.91(a)(1) requirements, the previous analysis applying the standards of 10 CFR 50.92 in making a no significant hazards consideration determination remains applicable without revision, since the proposed changes to the text involved administrative, non-technical issues. Also enclosed is a Certificate of Service for the additional proposed revisions certifying service to the chief executives of Liberty Township and Bedford County, Pennsylvania, in which the facility is located, as well as the designated representative of the Commonwealth of Pennsylvania, Bureau of Radiation Protection. It also includes an oath affirming the accuracy of the information provided.

Sincerely,

G. A. Kuehn  
Vice President SNEC

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PDR ADOCK 05000146  
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Attachments

cc: Administrator, NRC Region I - Hubert J. Miller  
NRC Project Manager, NRR - Alexander X. Adams  
NRC Project Scientist, Region I - Thomas F. Dragoun

Attachment 1

Certificate of Service for  
Proposed Technical Specification Changes  
based on the NRC Request for Additional Information

1 Page

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF  
SAXTON NUCLEAR EXPERIMENTAL CORPORATION  
AND GPU NUCLEAR INC.

LICENSE NO. DPR-4  
DOCKET NO. 50-146

CERTIFICATE OF SERVICE

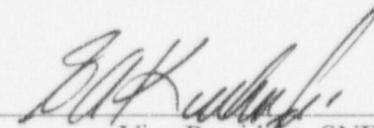
This is to certify that the pages for Technical Specification Change Request No. 59 to Appendix A of the Operating License for the Saxton Nuclear Experimental Corporation facility as revised in response to the NRC Request for Additional Information have, on the date given below, been filed with executives of Liberty Township, Bedford County, Pennsylvania; Bedford County, Pennsylvania; and the Pennsylvania Department of Environmental Protection, by deposit in the United States mail addressed as follows:

Mr. Donald Weaver, Chairman  
Liberty Township Supervisors  
R.D. #1  
Saxton, PA 16678

Mr. Richard Rice, Chairman  
Bedford County Commissioners  
County Courthouse  
203 South Juliana Street  
Bedford, PA 15522

Director, Bureau of Radiation Protection  
PA Department of Environmental Protection  
Rachael Carson State Office Bldg., 13th Floor  
P.O. Box 8469  
Harrisburg, PA 17105-8469  
Attn: Kenneth Singh

GPU NUCLEAR INC.

BY:   
Vice President, SNEC &  
Program Director, SNEC Facility

DATE: 5/30/97

Attachment 2

Proposed Technical Specification Changes  
based on the NRC Request for Additional Information

20 Pages

1. Please provide a description of the containment vessel(CV)/decommissioning support building (DSB) ventilation system.

Response- The Containment Vessel (CV)/ Decommissioning Support Building (DSB) ventilation system consists of a fan, HEPA filter, pre-filter, radiation monitor and associated ductwork. The system pulls a nominal 6500 cfm of air through weighted dampers in the DSB, through the DSB, then through the CV, then through the pre-filters and HEPA filters, past the radiation monitor and exhausts via a low stack to the outside. The radiation monitor is downstream of the HEPA filter and is interlocked to shut the fan off and sound an alarm if its set point is exceeded or there is a failure in its circuit. This alarm sounds locally in the DSB and is actuated at the remote dispatch center which is manned 24 hr/day. Also, two ionization smoke detectors are located in the system's main intake plenum located in the CV which sounds a local alarm and shuts down the fan which will initiate a fan off alarm in the dispatch center.

2. In your proposed section 2.B.(3) of the SNEF license, you removed the word "Domestic" from the title of Part 30. Is this a typographical error? If so, please correct.

Response- Removal of the word "Domestic" was an inadvertent omission. It has been included in the title of Part 30 on the attached proposed revised page of the license.

3. In your proposed Section 2.C of the SNEF license, you added Appendix B of Part 50 as a specific regulation to which the license is subject. The provisions of Appendix B are not applicable to the SNEF. Is it your intention through this amendment application, to commit to the provisions of Appendix B?

Response- It is not our intention to commit, through this amendment application, to the provisions of 10 CFR 50 Appendix B. 10 CFR 50 Appendix B was used as a basis or template for the creation of the Saxton Nuclear Experimental Corporation Facility Decommissioning Quality Assurance Plan. A corrected SNEC Facility license page containing section 2.C is included which does not include 10 CFR 50 Appendix B as a regulation to which the license is subject.

4. You have proposed changes to Section 3 of the SNEF license. Please provide a justification for your proposed changes.

Response- The current section 3 of the SNEF license addresses only the date of effectiveness of the license amendment. In the interest of bounding the period that the new and any subsequent license amendments would be in effect, the additional text regarding expiration was included. The license is due to expire at midnight on February

11, 2000 based on a license life of forty years. The additional sentence was included to reflect that, ultimately, the Commission determines the date of license termination.

5. In Section III(a)li, ii, iii, iv, and ix of your amendment application, reference is made to Section 3.1 of the post-shutdown decommissioning activities report (PSDAR). The topic of this section of the PSDAR does not match the amendment application discussion. Please explain.

Response- Reference to section 3.1 of the PSDAR was incorrect. The appropriate reference is section 3.4 entitled "Accident Analyses".

6. In Section III(a)lviii of your amendment application, reference is made to Sections 3.3, 3.5, and 3.6 of the PSDAR. The topic of Section 3.3 of the PSDAR does not match the amendment application discussion and there are no Sections 3.5 and 3.6 in the PSDAR. Please explain.

Response- Sections 3.4.1.3, 3.4.1.5 and 3.4.1.6 respectively entitled "Vacuum Filter-Bag Rupture", "Oxyacetylene Explosion" and "Explosion of Liquid Propane Gas (LPG) Leaked From a Front-End Loader" are the correct references which should have been indicated in the proposed amendment request.

7. Section 3.9B of the USAR refers to Section 3.8C, and Sections 3.10A, B, D and G refer to Section 3.8A. However, the USAR does not have a Section 3.8A or C. Please explain.

Response- Section 3.9B of the USAR should refer to section 3.9C as the correct reference. The references in sections 3.10A, B, D and G should refer to section 3.9A in lieu of section 3.8A which was incorrectly identified as the reference.

8. Section 3.10A of the USAR refers to a previous SAR from 1972. The date of the 1972 SAR is incomplete. Please correct.

Response- The SAR is dated "April, 1972" and was submitted to the AEC by letter on April 14, 1972.

9. Proposed elimination of current Technical Specification (TS) A.2.d. Will employees of the Pennsylvania Electric Company be on site at all times when the SNEF work force will not (e.g., nights and weekends)? If so, please provide additional justification for the elimination of this TS.

Response- No, Pennsylvania Electric Company employees will not be on site at all times when the SNEC facility work force is not. Current TS A.2.d. does not require on site presence of Pennsylvania Electric Company (Penelec) employees when the SNEC facility work force is not. The current TS A.2.d. section only defines the reporting requirement for changes observed in the facility status. It is anticipated that the two Penelec line Crew employees who work out of the line crew facility Monday through Friday will be transferred from the site and the Saxton line crew facility will be closed. The SNEC facility site has not been continuously manned for over twenty years. During periods of inactivity at the site, the line crew checked the SNEC facility fence each day and reported any changes in the facility status as required by TS A.2.d.

For the following reasons, the elimination of current TS requirement A.2.d. will not result in a decrease in the security of the site. With the start of full time decommissioning activities at the site, increased scrutiny of the facility status will be afforded during working hours more often than is currently provided under the current TS requirement since the Penelec line crew is frequently, out on call, away from the facility. At times when the SNEC facility work force will not be on site, access to the facility will be restricted by the present security fence(s) and all structures which contain radioactive materials will be secured as defined in section 1.0.14 of the proposed TSs.

Access to the SNEC facility Containment Vessel (CV), and the adjoining Decommissioning Support Building (DSB) will be restricted by normal industrial security measures and unauthorized access will be detected by the installed intrusion alarm system(s).

The elimination of the current TS A.2.d. will not result in the decrease of any security function currently performed. There is no requirement for continuous occupancy of the site at present. The elimination of current TS A.2.d. will reflect the practical change in the reporting chain to notify the responsible parties of a change in the facility status. With the start of full time decommissioning activities using a dedicated staff, the notification requirement is better carried out by those personnel rather than the Penelec line crew.

10. Please provide a definitions section for the revised TSs which defines terms that are unique to the SNEF TSs.

Response- A definition section has been compiled which contains terms and definitions thereto which are unique to the SNEC facility TS or were otherwise considered appropriate for inclusion. The section will be included in section 1.0 of the proposed TSs.

## “Definitions”

### 1.0.1 CONTAINMENT VESSEL -

Term used to describe the vertical steel cylinder which houses the Saxton Nuclear Experimental Corporation Facility Nuclear Steam Supply System (NSSS) and related components, also known as the CV.

### 1.0.2 CV SECURED -

The term CV SECURED applies to the controls necessary to make an initial CONTAINMENT VESSEL (CV) entry. It does not refer to any security measures CV SECURED means that the CV has been sealed from personnel entry.

### 1.0.3 DECOMMISSIONING ACTIVITIES -

The term DECOMMISSIONING ACTIVITIES describes all of those activities needed to decommission the SNEC Facility and return the site to unrestricted use. Examples of these activities include; PRODUCTION ACTIVITIES needed to conduct decommissioning such as physical dismantlement; radioactive waste preparation, treatment, packaging and shipment; radiation protection activities, construction and installation of support systems, structures and components, and final status survey.

### 1.0.4 DECOMMISSIONING SUPPORT BUILDING (DSB) -

The DECOMMISSIONING SUPPORT BUILDING (DSB) is the facility constructed south east of the containment vessel (CV) and attached to the CV. Used to facilitate the decommissioning process and allow the preparation and packaging of radioactive material for shipment.

### 1.0.5 EXCLUSION AREA -

The term EXCLUSION AREA refers to the area shown on Figure 1 of the Technical Specifications and defines the area controlled for the purpose of security and access restrictions.

### 1.0.6 GPU NUCLEAR -

GPU NUCLEAR is the co-licensee with the Saxton Nuclear Experimental Corporation (SNEC) for the Saxton Nuclear Experimental Corporation facility and

is responsible for the decommissioning of the SNEC facility. GPU NUCLEAR is a wholly owned subsidiary of GPU Inc.

1. 0.7 MEASURABLE RELEASE -

A MEASURABLE RELEASE is defined as that radioactive release which meets or exceeds the Lower Limit of Detection (LLD) for liquid and gaseous radioactive effluents as specified in the ODCM.

1. 0.8 MEMBER(S) OF THE PUBLIC -

MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the Saxton Nuclear Experimental Corporation facility. This category does not include employees of the GPU Inc., contractors or vendors. Also excluded from this category are persons who enter the Facility site to service equipment or to make deliveries.

1. 0.9 OFFSITE DOSE CALCULATION MANUAL (ODCM) -

The OFFSITE DOSE CALCULATION MANUAL (ODCM) contains the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluent, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program (REMP). The ODCM also contains (1) the Radiological Effluent Controls, (2) the REMP, and (3) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports.

1. 0.10 OPERABLE - OPERABILITY -

A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s) and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

1. 0.11 PROCESS CONTROL PROGRAM (PCP) -

The PROCESS CONTROL PROGRAM (PCP) contains the current formulas, sampling, analyses, test, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial

ground requirements, and other requirements governing the disposal of solid radioactive waste.

1. 0.12 PRODUCTION ACTIVITIES -

PRODUCTION ACTIVITIES are the physical activities needed to conduct the decommissioning of the SNEC facility site. Included are such activities as the removal of systems, structures and components, demolition of structures and associated components, removal of contaminants to allow free release, excavation, trenching and removal of underground facilities.

These activities are a sub-set of DECOMMISSIONING ACTIVITIES.

1. 0.13 RADIOACTIVE WASTE MANAGEMENT ACTIVITIES -

The term RADIOACTIVE WASTE MANAGEMENT ACTIVITIES is defined as those activities which involve the handling of radioactive waste materials.

1. 0.14 SECURED -

The term SECURED is used in place of the term "locked" in order to describe those controls required to be placed on the EXCLUSION AREA to prevent unauthorized access. SECURED means that reasonable methods will be employed to prevent unauthorized access inside the EXCLUSION AREA. Such methods shall be at least equivalent to locking with a physical lock. Examples of such means are: windows on the DECOMMISSIONING SUPPORT BUILDING (DSB) could be covered with a security grating, a door or hatch on the CONTAINMENT VESSEL (CV) could be welded shut or rendered inoperable, temporary openings in the CV shell or EXCLUSION AREA fence could be physically guarded until otherwise suitably secured, or restraining devices such as inaccessible or tamper resistant bolts could be installed on gates or doors.

1. 0.15 SITE BOUNDARY -

The SITE BOUNDARY is the boundary line forming the basis for the limits on the release of radioactive gaseous effluents. At the SNEC facility, the SITE BOUNDARY for radioactive gaseous effluents is the line formed at a 200 meter radius from the center of the Containment Building.

1. 0.16 SNEC -

The term SNEC is an acronym for the Saxton Nuclear Experimental Corporation.

1. 0.17 SUBSTANTIVE CHANGE(S) -

SUBSTANTIVE CHANGE(S) are those which affect the activities associated with a document or the document's meaning or intent. Examples of non-substantive changes are: (1) correcting spelling; (2) adding (but not deleting) sign-off spaces; (3) blocking in notes, cautions, etc.; (4) changes in corporate and personnel titles which do not reassign responsibilities and which are not referenced in the Technical Specifications; and (5) changes in nomenclature or editorial changes which clearly do not change function, meaning or intent.

1. 0.18 UNRESTRICTED AREA -

An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY access to which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials, or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes.

Inclusion of "Definitions" as section 1.0 resulted an incremental renumbering of the subsequent subsections. The addition of definitions to the proposed revised wording of the designated TS section is for clarity and is administrative in nature.

11. Proposed TS 1.3.1. You have proposed changing the word "locked" to "secured". Please define "secured" and explain how this will provide a level of security equivalent to keeping access points locked.

Response- The term "secured" is used to replace the term "locked" in the proposed TSs in order to accommodate those means of preventing unauthorized access which provide at least equal and usually greater levels of protection against such unauthorized access. As examples, in lieu of simply locking: windows on the DSB could be covered with a security grating; a door or hatch on the CV could be welded shut or rendered inoperable; temporary openings in the CV shell or exclusion area fence could be physically guarded until otherwise suitably secured; or restraining devices such as inaccessible or tamper resistant bolts could be installed on gates or doors. Although these methods would be employed to achieve a level of security comparable to or greater than "locking", a true "lock" would not be employed in such cases and so we have proposed replacing this term with "secured" in order to allow the use of such methods.

The definition of the term "secured" is provided in the proposed definitions section 1.0.14.

12. Proposed TS 2.0. Your proposed TS refers to Section 1.2.1 of the SNEC PSDAR. Your proposed wording would make this part of the PSDAR a TS requirement needing a license amendment to change. A purpose of the recent amendments to the decommissioning regulations was to reduce the regulatory burden on licensees carrying out decommissioning activities. To allow latitude to change section 1.2.1 of the PSDAR without requesting a TS amendment change, wording such as "... and activities delineated in section 1.2.1 of the SNEC Facility Post-Shutdown Decommissioning Activities Report (PSDAR) that are not prohibited by license condition or technical specification" could be used.

Response- To eliminate the need to initiate an otherwise unnecessary TS change request because of the need to change section 1.2.1 of the PSDAR, the proposed wording of TS section 2.0 has been revised as indicated below:

2.0            PRINCIPAL ACTIVITIES

Activities permitted at the SNEC facility shall include the routine and emergency inspections, maintenance associated with the possession of the SNEC facility, characterization activities and activities delineated in Section 1.0.3, Decommissioning Activities, of these Technical Specifications.

The change is administrative in nature.

13. Proposed TS 3.1. This TS refers to the SNEC organization. Because SNEC and GPU Nuclear are joint licensees, should this refer(ence) to the SNEC facility organization include GPU Nuclear? The proposed TS also states that the organization is depicted on figures 2.3-1 and 2.3-2 of the SNEC Facility PSDAR. This could be interpreted as the organizational charts being a TS requirement. To prevent this interpretation, wording such as "these requirements shall be documented in the SNEC Facility PSDAR" could be used. Please see Generic Letter 88-06 dated March 22, 1988, for additional information.

Response- At GPU Nuclear, organization charts take one of two general forms. The first identifies a company division and all subparts and individuals assigned thereto. The second identifies a plant or project and shows the working and reporting relationship between the divisions and the personnel within them that are assigned to the project. The SNEC organization depicted is an example of this second type. The name given does not identify both licensees, SNEC and GPU Nuclear, because it is a project organization chart.

As addressed in section III of the TSCR 59, "Safety Evaluation Justifying Changes", it is our intention to eliminate the SNEC Organization Chart, Figure 2, from the TSs.

Therefore, wording which implies or could be interpreted to continue the organizational charts as a TS requirement was not intended. To add further clarity, proposed revised text in Section 3.1 has been revised as follows:

3.1 "GPU Nuclear has the responsibility for safely performing decommissioning activities. Lines of authority, responsibility and communication are procedurally defined and established. The relationships shall be identified and updated, as appropriate, in organizational charts, departmental functional responsibility and relationship descriptions, job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the SNEC Facility PSDAR."

14. Proposed TS 3.1.4. Please define "production activities". Should this be interpreted as "decommissioning activities"? Please clarify.

Response- The terminology "production activities" is appropriate as used in this TS. It was used to differentiate between the subset of hands-on on site physical work to which the term applies. Other activities (i.e. preparation of program plans, equipment procurement, laboratory environmental sample analyses, quality assurance auditing and monitoring and design engineering) which are also considered "decommissioning activities" would not require management and oversight by the SNEC Facility Site Supervisor. A definition for PRODUCTION ACTIVITIES has been provided in proposed TS section 1.0.12.

15. Proposed TS 3.2.1. Your proposed TS discusses the CV as being secured. This is defined in your current TS but not your proposed TS. Please define what is required to have the CV secured. Your proposed TS requires radiological surveys if the CV has been secured for a period greater than 24 hours. Considering the increase in activities that will accompany dismantling of the CV, please justify not conducting a radiological survey at each initial entry after the CV is secured.

Response- The term "CV SECURED" is defined in the proposed definition section. We will continue the practice of conducting an initial radiological survey at each initial entry after the CV is secured.

16. Proposed TS 3.2.2. Your evaluation states (top of page 4 of 23) that the current TSs address radioactive waste management activities within the CV. Current TS B.1.c.2 addresses entry and/or maintenance or characterization activities within the CV. Please justify the changes in your proposed TS and define "radioactive waste management activities".

Response- The reviewer has correctly identified an error in the evaluation which stated that "The previous text addressed radioactive waste management activities within the CV only." The inclusion of the phraseology "radioactive waste management activities" instead of "entry and/or maintenance or characterization activities" was inadvertent.

The proposed change accomplishes two actions: first it requires the presence on site of the Radiation Safety Officer (RSO) or a Group Radiological Controls Supervisor (GRCS) whenever radioactive waste management activities, as defined in section 1.0.13 of the TS, are in progress. This change increases the scope of control of the RSO and GRCS to all activities within the realm of the definition and over the entire site versus the prior limited area "within Containment". This change assures that management will have direct control of these activities. The change also specifies the management position, GRCS, as the "qualified designee". These changes deal with management's span of control, are administrative in nature.

17. Proposed TS 3.4.1. This proposed TS refers to training as delineated by section 2.4 of the PSDAR. How will it be ensured that changes will not be made to this section of the PSDAR, and thus, a change to the TS, without NRC approval?

Response- To eliminate the concern with reference to the PSDAR, proposed TS section 3.4.1 has been revised as provided below to incorporate the intent of the job specific training into the TSs.

3.4.1           The job specific training or knowledge necessary to accomplish a specific task or project goal shall be dictated by the dismantlement or decommissioning work scope.

The change is administrative in nature.

18. Proposed TS 3.5.1.1. Why is the responsibility of the Vice President level within GPU Nuclear limited to the activities described in proposed TS 3.5.1.2 and 3.5.1.7? For the proposed activities in TSs 3.5.1.3, 3.5.1.4, 3.5.1.5, and 3.5.1.6, please state what level of management has responsibility and justify the management level.

Response- The "and" should have been "through": therefore section 3.5.1.1 will be revised to read as follows:

3.5.1.1       The Vice President of each division within GPU Nuclear supporting the SNEC facility decommissioning project shall be responsible for ensuring the preparation, review, and approval of documents required by the activities described in sections 3.5.1.2 through 3.5.1.7 within his functional

area. Implementing approvals shall be performed at the cognizant manager level or above.

The change is editorial in nature.

19. Proposed TS 3.5.1.5. Why does the proposed TS refer to facility structures, systems and components in the PSDAR as opposed to the SAR?

Response- The SAR will be amended, at its next revision, to include a section which describes applicable structures, systems and components at the SNEC facility. The proposed wording for section 3.5.1.5 is revised as shown below:

- 3.5.1.5 Proposed modifications to facility structures systems and components as described in the SNEC Facility SAR determined to be within the scope of the SNEC Facility Decommissioning QA Plan and QA program, shall be designed by an individual/ organization knowledgeable in the areas affected by the proposed modification. Each such modification shall be technically reviewed by an individual other than the individual who designed the modification but may be from the same group as the individual who designed the modification.

The change is administrative in nature.

20. Proposed TS 3.5.1.8. This proposed TS uses the term "unreviewed safety question." Is this TS related to meeting the requirements of 10 CFR 50.59? If so, explain the relationship between the reviews in proposed TS 3.5.1.2 through 3.5.1.6 and the requirements of 10 CFR 50.59(a).

Response- Yes, this TS is related to meeting the requirements of 10 CFR 50.59. In addition to imposing administrative requirements to ensure compliance with 10 CFR 50.59, these sections also implement our internal requirements to perform a predecisional review of any change to the facility or procedure, or proposed tests or experiments to determine if a safety evaluation in accordance with 10 CFR 50.59 is required. These are known as "safety determinations" and are performed for all procedure changes including the implementation of new procedures and for any facility changes. Thus, even those changes which do not require a safety evaluation to comply with 10 CFR 50.59, still receive a safety determination to independently verify the conclusion that no safety evaluation is required.

Based on these reviews, proposed changes, tests or experiments are further evaluated to make a determination whether or not a condition of 10 CFR 50.59(a) exists which would

deem the proposed change, test or experiment to involve an unreviewed safety question or require a change to the technical specifications. If either is found to exist, NRC approval is required prior to initiating the change, test or experiment. Finally, this evaluation is reviewed in accordance with proposed TS 3.5.2 as an independent verification of the appropriateness of the previous determination results.

21. Proposed TS 3.5.2.5.1. This proposed TS discusses evaluations of changes in the facility and changes of procedures described in the SAR which are completed without prior NRC approval under the Provisions of 10 CFR 50.59(a)(1). Please Indicate the sections of the Saxton SAR that describe the SNEF that would be subject to this proposed TS and 10 CFR 50.59(a)(1). Also indicate what procedures listed in the SAR would be subject to this TS and 10 CFR 50.59(a)(1).

Response- A section will be included in the USAR to incorporate a description of the SNEC facility. It is through a comparison with this section that written safety evaluations of decommissioning activities will be completed under the provisions of 10 CFR 50.59(a)(1) to allow the change in the facility without prior NRC approval.

Regarding changes to procedures, section 5.3 of the USAR states that "Written procedures are established, implemented and maintained to provide for the control and performance of those decommissioning activities which affect quality, health and safety of the public and project personnel or regulatory requirements." Typical procedure categories are specified. This section identifies the procedures subject to this TS and 10 CFR 50.59(a)(1). It is not our intent to provide an all inclusive listing in the USAR of procedures associated with decommissioning activities which would require changes thereof to be reviewed in accordance with TS 3.5.2.5.1.

22. Proposed TS 3.5.2.5.1. Your proposed TS states that the reviews discussed in this TS need not be performed prior to implementation of the changes, tests or experiments. Please explain this position.

Response- The intent of proposed TS 3.5.2.5.1 is to ensure that the reviews discussed are completed prior to the implementation/operation of the proposed change (facility or procedure changes). It is not intended that they be complete prior to and during preparatory activities associated with the change such as design, material procurement, prefabrication etc. performed in support of the facility or procedural change. Reviews associated with preliminary actions preceding tests or experiments are to be handled in the same manner to allow performance of preparatory activities prior to completion of the review. The review must be completed prior to the performance of the test or experiment. The wording of proposed TS section 3.5.2.5.1 has been revised as shown below to ensure that all safety evaluations are completed as required:

- 3.5.2.5.1 Written safety evaluations of changes in the facility and changes of procedures described in the Safety Analysis Report, and of tests or experiments not described in the Safety Analysis Report, which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). This review is to verify that such changes, tests or experiments did not involve a change to the TS or an unreviewed safety question as defined in 10 CFR 50.59(a)(2). Written safety evaluations associated with the direct performance of a change, test or experiment shall be completed prior to the initiation of the activity.

This change clarifies the intent of the proposed revised wording of the designated TS section and is administrative in nature.

23. Proposed TS 3.5.3.1.c. Please propose and justify an upper bound for this surveillance that appears in the TS. Are there any requirements for calibration of the radiation monitoring system? Consider a TS requirement for system calibration and to verify operability of the system after system maintenance occurs.

Response- The Station ventilation system effluent particulate monitor surveillance requirements are specified in the ODCM. The ODCM states that the radiation monitor will be channel checked (operability check) daily when decommissioning activities are occurring in the CV. A source check and a channel test will be performed on a weekly basis in accordance with the ODCM. In addition, this monitor will also be calibrated semi-annually, in accordance with the ODCM requirements. As a result, the the wording of the proposed section has been revised to read:

- 3.5.3.1.c The station ventilation system effluent particulate monitor channel checks, source checks, channel test and channel calibration shall be performed at a frequency specified in the ODCM.

The change is administrative in nature.

24. Proposed TS 3.5.3.1.d. This surveillance requirement should specify testing details such as acceptable filter leakage and bypass flow, design flow rate of the system to be tested, and acceptable pressure drop across the filters at the design flow rate. Please justify your proposed inspection interval of annually. Alternatively, if these details are contained within the ODCM, a commitment to test in accordance with the ODCM would be acceptable.

Response- The requirements for filter leakage and bypass flow, design flow rate and acceptable pressure drop across the filters will be listed in the ODCM. section 3.5.3.1.d is being revised to state:

3.5.3.1.d "The ventilation system HEPA Filter will be tested to verify efficiencies in accordance with the requirements of the ODCM."

The change is administrative in nature.

25. Proposed TS 3.5.4. <sup>a</sup>Please justify your proposed minimum biennial audit cycle in light of the increase in activities that will occur with CV dismantlement. <sup>b</sup>You also state on page 16 of 23 of your amendment application that the TS is being revised to identify the audit function provided by GPU Nuclear. Your current TS states that the audit function is provided by GPU Nuclear but your proposed TS does not refer to GPU Nuclear. Please clarify this apparent inconsistency.

Response- a) Proposed TS 3.5.4 states in part that the audit frequency is generally biennial, however frequency is based on the level of activity at the SNEC facility. Audits may also be scheduled at any time upon the request of the GPU Nuclear President. Therefore, audits of the SNEC facility may be performed more frequently than biennially if the level of activity at the site warrants the change, or if the GPU Nuclear President so directs. The audits of the SNEC facility will be broad based programmatic assessments of, at a minimum, those activities designated to be within the scope of the SNEC Facility's Quality Assurance Program. The GPU Nuclear Nuclear Safety Assessment (NSA) Department will implement its monitoring program to assess the adequacy of performance for decommissioning activities. This monitoring program is required per section 19.1 of, 1000-ADM-3000.05, "Saxton Nuclear Experimental Corporation Facility Decommissioning Quality Assurance Plan". The monitoring program will be utilized as the assessment program for the SNEC facility when audits are not being conducted.

This monitoring program considers the uniqueness and safety significance of the activity as a basis for scheduling monitorings at the SNEC facility. As a minimum, activities breaching of the containment integrity for the purpose of interconnecting the CV and DSB, large component removal, and removal of the deborating demineralizer vessel will be monitored. Periodic monitoring will be performed to overview other decommissioning activities.

b) Section 19.2 of the SNEC Facility Decommissioning Quality Assurance Plan states in part that the audit function shall be conducted by the GPU Nuclear NSA Department. Section 2.3.10 of this QA Plan also requires the GPU Nuclear NSA Department to establish an audit program for the SNEC facility, and to implement the program utilizing personnel who meet the requirements of ANSI N45.2.23.

26. Proposed TS 3.5.5.3. Your proposed TS retains the current annual meeting frequency of the radiation safety committee. Please justify this meeting frequency considering the increase in activities that will accompany CV dismantling.

Response- The meeting frequency in the proposed revised TS is unchanged from the current TS requirement. GPU Nuclear has scheduled meetings and the RSC has met at least quarterly since its formation. To take credit for the increased meeting frequency actually being met, the wording of section TS 3.5.5.3 will be revised as shown below. Justification for this administrative change is based on the increase in activities that will accompany CV dismantling.

3.5.5.3 Meetings are scheduled quarterly and shall be held at least three times per year.

The change is administrative in nature.

27. Proposed TS 3.6.1.2. Please add fire protection program implementation (as stated in section 3.7-1) and emergency procedures under required written procedures.

Response- The implementation of the Fire Protection Program is located in the Emergency Actions procedure, therefore it will be added in TS 3.6.1.2.2 as shown below:

3.6.1.2.2 Access control, emergency actions (including fire protection program implementation), facility inspections and audits.

The change is administrative in nature.

28. Proposed TS 3.6.1.2.1. Your proposed TS 3.6.1.2.1 is an update to existing TS B.3.b.1. The addition of decommissioning activities is described on page 9 of 23 of your amendment application. However, the proposed TS also has another proposed change related to the scope of the QA program that is not justified in your application. Please explain and justify this change.

Response- The text "Activities determined to be within the scope of the QA program" was incorporated in the proposed TS without supporting justification. The proposed revised wording broadens the extent of activities for which procedures are required to be established, implemented and maintained. Characterization and maintenance activities with a singular specific reference to 10 CFR Part 20 requirements has been extended whereby GPU Nuclear is committing to conduct the decommissioning of the SNEC facility in accordance with procedures providing for compliance with appropriate regulatory (10 CFR Parts 19, 20, 21, appropriate sections of Part 50 and Part 71), statutory, license and industry requirements. The change is administrative.

29. Proposed TS 3.6.1.2.4. You propose eliminating TS B.3.c.2. Your justification appears to be the wording of your proposed TS 3.6.1.2.4. TS B.3.c.2 discusses obtaining radiation levels and surveys prior to beginning work in controlled areas of the CV. Proposed TS 3.6.1.2.4 discusses activities which could result in a measurable release to the environment. While some activities under TS B.3.c.2 could be part of TS 3.6.1.2.4 because the activities could result in a measurable release to the environment, one reason for TS B.3.c.2 is worker protection by assuring that information on radiological conditions is up to date. Please reinstate wording similar to TS B.3.c.2 or provide additional justification for its elimination.

Response- It appears in the refamiliarization with the justification provided for the revision of existing TS section B3.b.4 as identified on page 9 of 23 in section III. Safety Evaluation Justifying Changes of the TSCR, that the concept was either not fully developed or inappropriately edited such that it lost its meaning. The proposed change to the current wording "Activities which could impact containment integrity and/or could result in a measureable release to the environment" limited the proposed wording to "Activities which could result in a measureable release to the environment". The justification for the change was that activities "which could impact containment integrity" are included in the proposed revised section 3.6.1.2.1 with the addition of the word "decommissioning".

The requirement of current section B.3.c.2 dates to the period when inspection and maintenance activities at the SNEC facility were performed on a quarterly frequency and to ensure that prerequisite data regarding the radiological condition of the CV was obtained prior to initiation of work. Justification for the elimination of current section B.3.c.2 is based on the fact that the requirement is redundant with that contained in section 3.6.1.3.1. The requirements for survey and evaluation of radiological conditions are consistent with those of 10 CFR 20 which are identified in the proposed wording of section 3.6.1.3.1.

30. Proposed TS 3.6.1.3. Instead of procedures requiring that the actions delineated therein be taken, the requirement for these actions should be elsewhere in the TS. This proposed TS should only insure that the required actions are addressed in procedures. Please address.

Response- The wording of current TS section B.3.c was transferred unchanged to section 3.6.1.3 of the proposed revised TS. The section is effectively saying that the following actions are required to be proceduralized. Revising the existing process in a manner to address this comment is viewed as change with no value added. Required actions delineated in section 3.6.1.3 and contained in procedures will not be revised or eliminated without first receiving NRC approval via a TSCR.

31. Proposed TS 3.6.1.3.1. Your proposed TS 3.6.1.3.1 is an update to existing TS B.3.c.1. The addition of decommissioning activities is described on page 9 of 23 of your amendment application. However, the proposed TS also has another proposed change related to the release of radioactivity in excess of allowable limits that is not justified. Please explain and justify this other change.

Response- Failure to justify the revision of the wording in current TS section B.3.c.1 with regard to the release of radioactivity was an oversight. Consider the following as justification for the other proposed change. Current TS section B.3.c.1 includes the phraseology "to prevent the release of radioactivity to the environment." Although it was conceivable to satisfy this requirement during the period the facility remained in a pseudo SAFSTOR condition, it is not realistic to continue with a "no" release requirement during decommissioning. The proposed revised wording regarding "prevent the release of radioactivity in excess of allowable limits" takes into consideration the expected release of some quantity of radioactive material during decommissioning activities while maintaining that such releases will be within allowable limits and keeping the releases as low as reasonably achievable.

32. Proposed TS 3.6.2.1. Please provide a copy of your ODCM.

Response- In its response to question 37 of the request for additional information on the SNEC Facility Decommissioning Plan (now the PSDAR), GPU Nuclear committed to submit the ODCM to the NRC upon issuance of the document. It is still our intent to submit the ODCM when issued.

33. Proposed TS 3.6.2.3. Please provide a copy of your process control program.

Response- As previously addressed, GPU Nuclear has not identified any specific activities which will require the use of a process control program. The referenced TS section was included in the proposed TS as a means to identify the minimum content of a process control program should one be required. If processing activities requiring a process control program are initiated during the decommissioning of the SNEC facility, either a previously approved NRC process control program will be used or a process control program for a SNEC facility specific system will be submitted for NRC approval prior to process initiation.

34. Proposed TS 3.7. Please provide a copy of your fire protection program that you will use to meet the requirements of 10 CFR 50.48(f).

Response- Enclosed, as Attachment 4, is a copy of procedure 6575-ADM-4500.06, "Emergency Response Procedure and Emergency Plan" attachment 4, which satisfies the requirements of 10 CFR 50.48(f).

35. Proposed TS 3.8. Your proposed TS has SNEC responsible for certain reporting requirements. Given the division of responsibilities between SNEC and GPU Nuclear discussed in paragraphs 2.8.(1) and (2) of the license, Justify your proposed TS.

Response- The use of "SNEC" in the proposed wording of this TS section is used with the intent of identifying the SNEC facility decommissioning project organization. To eliminate a possible misunderstanding as to where the responsibility for such reports lies, the proposed revised wording will revert to the previously approved wording shown below. GPU Nuclear has been and will remain responsible for the submittal of required reports associated with the SNEC facility and its decommissioning. There will be no change to this section as a result of this action.

3.8            Reporting

In addition to those reports required by applicable NRC regulations (ie, violation of license or technical specification condition) GPU Nuclear shall submit the following:

By reverting to the currently approved TS requirement, no change is being made.

36. Proposed TS 3.8.1. Your proposed TS refers to notification by telegraph. To reflect advances in technology, you may change this to notification by facsimile.

Response- Section 3.8.1 was revised to state:

A report of any occurrence of a possible unsafe condition relating to the facility or to the public. For each occurrence, SNEC shall promptly, within 24 hours of discovery, notify by telephone or facsimile....".

The change is administrative in nature and reflects advances in technology.

37. Proposed TS 3.8.1.1. Your proposed TS uses the term "facility boundaries." Do you mean the CV? Please define and justify the use of this term.

Response- Section 3.8.1.1 states: "Any unplanned or uncontrolled release of radioactive material beyond the facility boundaries." TSCR 59 added the word "boundaries" to the

current TS requirement to clarify the otherwise ambiguous term "facility". Following additional consideration, it has been decided to further clarify this requirement by replacing "facility boundaries" with "site boundary". The latter term is defined, understood throughout the industry and used in 10 CRF Part 20. It has been specifically defined in the "Definitions" section of the proposed TS in section 1.0.15 and in the ODCM. Therefore, the section as proposed is revised to state:

3.8.1.1 Any unplanned or uncontrolled release of radioactive material beyond the site boundary.

The proposed change is administrative.

38. Proposed TS 3.8.2. Your safety analysis in the third paragraph on page 11 of 23 discusses proposed TS 3.8.2 which concerns reporting and current TS B.2.a.2 which concerns the Radiation Safety Committee. The connection between these TSs is not clear. Please provide additional information about your proposed change to the TSs.

Response- The last paragraph on page 10 of 23 initiated discussion of the safety analysis justification of changes to the inspection program. The third paragraph on page 11 is a continuation of that discussion identifying the inappropriateness of continuing the "quarterly" inspections during the decommissioning of the facility. It incorrectly identified proposed TS 3.8.2 as the section which discusses "Inspection". Inspection is contained in proposed TS 3.5.3.

39. Proposed TS 3.9. In the area of records, your proposed TSs have eliminated current TSs B.5.a and B.5.f. Please provide justification for these eliminations.

Response- Upon reconsideration, the elimination of current TSs B.5.a and B.5.f could not be explained other than by inadvertent oversight during compilation of the proposed new listing. To correct this error, the text provided below will be incorporated into TS 3.9 to reinstate the commitment to maintain the records described in current TSs B.5.a and B.5.f.

3.9.11 Inspections of the decommissioned facility including the results of surveys of radioactivity levels and as-found and as-left conditions of the facility.

3.9.12 Characterization study results.

The changes are administrative in nature.

40. Proposed Figure 1. Your figure shows the location of the proposed decommissioning support facilities. These facilities now exist. Please modify this figure as needed to reflect the current conditions at the site.

Response- A revised "Figure 1" is provided. Note that only "permanent and/or substantial" structures are reflected on this figure.

An additional proposed change is required as a result of discussions associated with this response to the request for additional information. GPU Nuclear is stipulating its intent to submit revisions to the SNEC Decommissioning Quality Assurance Plan which reduce commitments previously accepted by the NRC in the new proposed TS section 3.6.2.4 provided below:

#### 3.6.2.4 SNEC Decommissioning Quality Assurance Program

Quality assurance program requirements shall be established in a written SNEC Decommissioning Quality Assurance Plan. Revisions to this plan will be submitted to the NRC prior to the implementation of changes which involve a reduction in commitments previously accepted by the NRC and after implementation of changes having no reduction in commitment.

This proposed change is administrative in nature.

Attachment 3

Proposed Revised License page 2

1 Page

and

Proposed Revised Technical Specification pages

19 Pages

- 2) SNEC, pursuant to the Act and 10 CFR Part 50, is licensed to possess, but not to manage, use, maintain or operate, the Saxton facility at the designated location in Liberty Township, Bedford County, Pennsylvania, in accordance with the procedures and limitations set forth in the facility license; and
  - 3) GPU Nuclear, pursuant to the Act and 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material", is licensed to possess, but not to separate, such byproduct material as may have been produced by operation of the Saxton facility.
- C. This license shall be deemed to contain and be subject to the conditions specified in Part 20, Section 30.34 of Part 30, Sections 50.54, and 50.59 of 10 CFR Chapter I, and to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect, and to the additional conditions specified below:
- 1) GPU Nuclear shall not reactivate the facility without prior approval of the Commission.
  - 2) The Technical Specifications contained in Appendix A as revised through Amendment No. 14 are hereby incorporated in the license. SNEC and GPU Nuclear shall possess the facility in accordance with the Technical Specifications.
3. This license is effective as of the date of issuance and shall expire at midnight on February 11, 2000. It will continue in effect until the Commission notifies the licensee of its termination.