

Attachment 1

Proposed Technical Specification Changes

Memorandum

FOR THE RECORD

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TABLE 4.3-8 (Continued)

TABLE NOTATIONS

- (1) The ANALOG CHANNEL OPERATIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exist:
 - a. Instrument indicates measured levels above the Alarm/Trip Setpoint,
or
 - b. Circuit failure (Alarm only), or
 - c. Instrument indicates a downscale failure (Alarm only).
- (2) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used.
- (3) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic, or batch releases are made.

* For EMF-52, the alarm annunciation is in the Monitor Tank Building Control Room and on the MTB Control Panel Remote Annunciator panel.

TABLE 4.3-9 (Continued)

TABLE NOTATIONS

- * At all times except when the isolation valve is closed and locked.
 - ** During WASTE GAS HOLDUP SYSTEM operation.
 - *** At all times.
- (1) The ANALOG CHANNEL OPERATIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exists:
 - a. Instrument indicates measured levels above the Alarm/Trip Setpoint, or
 - b. Circuit failure (Alarm only), or
 - c. Instrument indicates a downscale failure (Alarm only).
 - (2) The ANALOG CHANNEL OPERATIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:
 - a. Instrument indicates measured levels above the Alarm Setpoint, or
 - b. Circuit failure, or
 - c. Instrument indicates a downscale failure.
 - (3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration shall be used.
 - (4) The CHANNEL CALIBRATION shall include the use of standard gas samples in accordance with the manufacturer's recommendations. In addition, a standard gas sample of nominal four volume percent hydrogen, balance nitrogen, shall be used in the calibration to check linearity of the hydrogen analyzer.
 - (5) The CHANNEL CALIBRATION shall include the use of standard gas samples in accordance with the manufacturer's recommendations. In addition, a standard gas sample of nominal four percent oxygen, balance nitrogen, shall be used in the calibration to check linearity of the oxygen analyzer.

* For EMF-58, the alarm annunciation is in the Monitor Tank Building Control Room and on the MTB Control Panel Remote Annunciator panel.

TABLE 4.11-1

RADIOACTIVE LIQUID WASTE SAMPLING AND ANALYSIS PROGRAM

LIQUID RELEASE TYPE	SAMPLING FREQUENCY	MINIMUM ANALYSIS FREQUENCY	TYPE OF ACTIVITY ANALYSIS	LOWER LIMIT OF DETECTION (LLD) ⁽¹⁾ ($\mu\text{Ci}/\text{ml}$)
1. Batch Waste Release Tanks ⁽²⁾ Any tank which discharges liquid wastes by either liquid effluent monitor, EMF-49 or EMF-54 <u>7</u>	P Each Batch	P Each Batch	Principal Gamma Emitters ⁽³⁾	5×10^{-7}
			I-131	1×10^{-6}
	P One Batch/M	M	Dissolved and Entrained Gases (Gamma Emitters)	1×10^{-5}
			P Each Batch	M Composite ⁽⁴⁾
	Gross Alpha	1×10^{-7}		
	P Each Batch	Q Composite ⁽⁴⁾	Sr-89, Sr-90	5×10^{-8}
Fe-55			1×10^{-6}	
2. Continuous Releases ⁽⁵⁾ Conventional Waste Water Treatment Line	Continuous ⁽⁶⁾	W Composite ⁽⁶⁾	Principal Gamma Emitters ⁽³⁾	5×10^{-7}
			I-131	1×10^{-6}
	M Grab Sample	M	Dissolved and Entrained Gases (Gamma Emitters)	1×10^{-5}
			Continuous ⁽⁶⁾	M Composite ⁽⁶⁾
	Gross Alpha	1×10^{-7}		
	Continuous ⁽⁶⁾	Q Composite ⁽⁶⁾	Sr-89, Sr-90	5×10^{-8}
			Fe-55	1×10^{-6}

Attachment 2

Discussion and No Significant Hazards Analysis

Amended

DISCUSSION AND NO SIGNIFICANT HAZARDS ANALYSIS

By letter dated March 23, 1988, a Technical Specification amendment was requested which would place controls on the equipment associated with the Monitor Tank Building which is being constructed on the Catawba site. The proposed amendment was reviewed and subsequently issued on April 26, 1988.

This amendment request would add a footnote to Table 4.3-8, Table Notation 1 and Table 4.3-9, Table Notation 2. This amendment would also change a reference on Table 4.11-1. Currently radiation monitor EMF-58 is referenced under Liquid Release Type, item 1. This monitor (EMF-58) is the gaseous release monitor. The liquid release monitor which should be referenced on Table 4.11-1 is EMF-57.

The footnotes to be added to Tables 4.3-8 and 4.3-9 would clarify that the alarm annunciators for EMF-57 and EMF-58 alarm in the Monitor Tank Building (MTB) Control Room and also on the remote MTB control panel which is located in the Auxiliary Building. This is in accordance with the design of this system as described in the March 23, 1988 submittal.

10 CFR 50.92 states that a proposed amendment involves no significant hazards considerations if operation in accordance with the proposed amendment 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.

The proposed amendment does not involve an increase in the probability or consequences of any previously evaluated accident. The previously evaluated accidents are not affected since these changes are to add clarification and to correct a reference to a monitor. As such, these changes are administrative and have no impact on the design or operation of the station.

The proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated. Since the changes requested are administrative in nature, no new modes of operation are introduced. The design and operation of the facility will not be affected by this amendment.

The proposed amendment does not involve a significant reduction in a margin of safety. Since these changes are administrative in nature, the margin of safety will not be affected.

For the above reasons, Duke Power concludes that this proposed amendment does not involve any Significant Hazards Considerations.