

Docket Number 50-346
License Number NPF-3
Serial Number 2559
Enclosure
Page 1

APPLICATION FOR AMENDMENT
TO
FACILITY OPERATING LICENSE NUMBER NPF-3
DAVIS-BESSE NUCLEAR POWER STATION
UNIT NUMBER 1

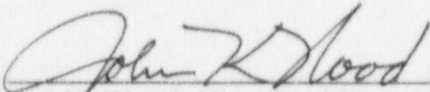
Attached are the requested changes to the Davis-Besse Nuclear Power Station, Unit Number 1 Facility Operating License Number NPF-3. Also included is the Safety Assessment and Significant Hazards Consideration.

The proposed changes (submitted under cover letter Serial Number 2559) concern:

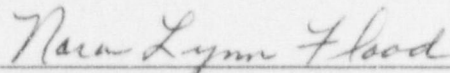
Appendix A, Technical Specifications (TS):

TS 6.5.1.6 - [Station Review Board] Responsibilities
TS 6.8.4.d - Radioactive Effluents Control Program
TS 6.10 - Records Retention
TS 6.11 - Radiation Protection Program
TS 6.12 - High Radiation Area
TS 6.15 - Offsite Dose Calculation Manual

I, John K. Wood, state that (1) I am Vice President - Nuclear of the Centerior Service Company, (2) I am duly authorized to execute and file this certification on behalf of the Toledo Edison Company and The Cleveland Electric Illuminating Company, and (3) the statements set forth herein are true and correct to the best of my knowledge, information and belief

By: 
J.K. Wood, Vice-President - Nuclear

Affirmed and subscribed before me 28th day of October, 1998.


Notary Public, State of Ohio

Nora Lynn Flood, My Commission expires September 4, 2002.

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The following information is provided to support issuance of the requested amendment to the Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1, Operating License NPF-3, Appendix A, Technical Specifications (TS). The amendment request involves changes to TS 6.5.1.6, "[Station Review Board] Responsibilities;" TS 6.8.4.d, "Radioactive Effluents Control Program;" TS 6.10, "Records Retention;" TS 6.11, "Radiation Protection Program;" TS 6.12, "High Radiation Area;" and TS 6.15, "Offsite Dose Calculation Manual."

- A. Time Required to Implement: These changes are to be implemented within 120 days after NRC issuance of the License Amendment.

- B. Reason for Change (License Amendment Request 97-0015): The proposed changes to TS 6.5.1.6, 6.8.4.d, 6.10, and 6.15 improve or update the content of TS Section 6.0, "Administrative Controls." The proposed change to TS 6.11 would relocate it to the DBNPS Updated Safety Analysis Report, thereby removing it from the TS consistent with the NRC's NUREG-1430, Revision 1, "Improved Standard Technical Specifications for Babcock and Wilcox Plants." The proposed changes to TS 6.12 include alternative methods for controlling access to high radiation areas and are proposed pursuant to 10 CFR 20.1601 (c). These changes are based upon the current revision to 10 CFR Part 20, "Standard for Protection Against Radiation," and the TS approved by the NRC for San Onofre Nuclear Generating Station Units 2 and 3 in Operating License Amendments 127 and 116.

- C. Safety Assessment and Significant Hazards Consideration. (See Attachment).

Docket Number 50-346
License Number NPF-3
Serial Number 2559
Attachment

SAFETY ASSESSMENT AND SIGNIFICANT HAZARDS CONSIDERATION
FOR
LICENSE AMENDMENT REQUEST 97-0015

(25 pages follow)

**SAFETY ASSESSMENT AND SIGNIFICANT HAZARDS CONSIDERATION
FOR
LICENSE AMENDMENT REQUEST NUMBER
97-0015**

TITLE:

Revise the Technical Specifications (TS) 6.5.1.6, "[Station Review Board] Responsibilities;" TS 6.8.4.d, "Radioactive Effluents Control Program;" TS 6.10, "Records Retention;" TS 6.11, "Radiation Protection Program;" TS 6.12, "High Radiation Area;" and TS 6.15, "Offsite Dose Calculation Manual"

DESCRIPTION:

The purpose of this License Amendment Request is to amend the Davis-Besse Nuclear Power Station (DBNPS) Operating License NPF-3, Appendix A, Technical Specifications (TS) by:

- 1) Revising the Station Review Board (SRB) responsibilities in TS 6.5.1.6 regarding the review of changes to plans and programs,
- 2) Revising various references in TS 6.8.4.d.2, TS 6.8.4.d.3, TS 6.8.4.d.7, TS 6.10.2.e, and TS 6.15.a.2 to updated or corrected references,
- 3) Removing TS 6.11, "Radiation Protection Program," and relocating it to the DBNPS Updated Safety Analysis Report (USAR),
- 4) Revising TS 6.12, "High Radiation Area," to reference the current revision to 10 CFR Part 20, Subpart G, "Control of Exposure from External Sources in Restricted Areas," and provide for NRC staff approval of alternative methods for controlling access to high radiation areas. In addition, alternative methods for monitoring personnel radiation dose rates are proposed.

These changes are being proposed in order to update and improve the content of the TS. The specific changes are discussed below.

TS 6.5.1.6:

The present TS 6.5.1.6 requires, in part:

The Station Review Board shall be responsible for:

- .
.
- i. Review of the Industrial Security Plan, the Security Training and Qualification Plan, the Security Contingency Plan and changes thereto.
- j. Review of the Davis-Besse Emergency Plan and changes thereto.
- .
.
- t. Review of the Fire Protection Program and changes thereto.

This License Amendment Request is proposing that these requirements be changed to the following (changes are highlighted by bold print):

The Station Review Board shall be responsible for:

- .
.
- i. Review of **changes to** the Industrial Security Plan, the Security Training and Qualification Plan, and the Security Contingency Plan.
- j. Review of **changes to** the Davis-Besse Emergency Plan.
- .
.
- t. Review of **changes to** the Fire Protection Program.

The present TS states that the SRB is responsible for reviewing the Industrial Security Plan, the Security Training and Qualification Plan, the Security Contingency Plan, the Emergency Plan, and the Fire Protection Program, and changes to these plans and program. The proposed TS states that the SRB is responsible for reviewing only the changes to the plans and the program. This TS revision is being proposed in order to clearly delineate the extent of the SRB's review of the aforementioned program and plans, and most efficiently use the SRB's review time.

TS 6.8.4.d:

The present TS 6.8.4.d concerns specific programs required to be established, implemented, and maintained at the DBNPS, and contains the following references which need to be updated or corrected:

- TS 6.8.4.d.2 and TS 6.8.4.d.7 references to "...10 CFR Part 20, Appendix B, Table II..." need to be editorially corrected to "...10 CFR Part 20, Appendix B, Table 2...".
- TS 6.8.4.d.3 reference to "...10 CFR 20.106..." needs to be updated to "...10 CFR 20.1302...". Under the revised Part 20, Section 20.1302 has replaced Section 20.106 regarding control of radioactivity concentration limits in effluents.

TS 6.10.2.e:

The present TS 6.2.10.e states:

The following records shall be retained for the duration of the Facility Operating License:

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. .
.

- e. Records of transient of operational cycles for those facility components identified in Table 5.7-1

The proposed TS states:

The following records shall be retained for the duration of the Facility Operating License:

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. .
.

- e. Records of transient **or** operational cycles for those facility components identified in the **USAR Table 5.1-8**.

License Amendment Number 204, dated December 8, 1995, (TAC Number M93814) approved the relocation of the content of Table 5.7-1 to USAR Table 5.1-8. The above proposed TS change will revise TS 6.2.10.e to reference this USAR table, and correct the "of" to "or".

TS 6.11:

The present TS 6.11 states the following:

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

USAR Section 12.3.1, "Health Physics - Program Objectives," describes the DBNPS Radiation Protection Program for ensuring compliance with 10 CFR Part 20. The administrative controls requirements of TS 6.11 will be added to USAR Section 12.3.1. This action will be completed no later than the implementation of the requested license amendment. Removal of TS 6.11 will simplify the TS and eliminate an administrative control which is not necessary in the TS since 10 CFR Part 20 Subpart B, "Radiation Protection Program," already contains these requirements which the DBNPS is required to meet. In addition, the proposed removal of TS 6.11 is consistent with NUREG-1430, Revision 1, "Improved Standard Technical Specifications for Babcock and Wilcox Plants," dated April 7, 1995, which does not contain this TS requirement. The TS Index on Page XVI will be revised to reflect the deletion of TS 6.11.

TS 6.12:

The present TS 6.12, "High Radiation Area," references 10 CFR Section 20.203(c)(2) requirements. However, these requirements have been replaced by those of 10 CFR Section 20.1601. The DBNPS is proposing this amendment to revise TS 6.12 to reflect 10 CFR Section 20.1601. Alternative methods are also being proposed pursuant to 10 CFR 20.1601(c) for controlling access to high radiation areas. Also, included in this License Amendment Request are proposed alternative methods for monitoring personnel exposure to radiation, including using state-of-the-art radiation protection monitoring methods such as closed circuit television and telemetry.

The differences between the present and proposed TS 6.12 requirements are:

- 1) In TS 6.12.1, the references have been changed from 10 CFR Section 20.203(c)(2) to 10 CFR Sections 20.1601(a), (b) and (c); and the dose rates changed from "less than or equal to 1000 mrem/hr" to "not exceeding 1.0 rem/hr at 30 centimeters." For these areas (designated a "High Radiation Area" at the DBNPS) the following differences are discussed:
 - a) Proposed TS 6.12.1.a specifically allows barricades for high radiation areas to be opened as necessary to permit entry or exit of personnel or equipment. Present TS 6.12.1 does not specify this allowance.
 - b) Although existing TS 6.12.1 required the use of a Radiation Work Permit (RWP), it does not specify that a RWP include radiation dose rates in the immediate work areas and other appropriate radiation protection equipment and measures, as proposed TS 6.12.1.b does specify.
 - c) Both existing and proposed TS 6.12.1 exempted health physics personnel from the requirement for a RWP, however, proposed TS 6.12.1.c also provides for the exemption of other personnel

continuously escorted by individuals qualified in radiation protection procedures (e.g., by health physics personnel).

- d) Proposed TS 6.12.1.d.3 allows for entering a high radiation area using a radiation monitoring device transmitting dose rate and cumulative dose to a remote receiver monitored by radiation protection personnel. No similar TS allowance presently exists.
 - e) Proposed TS 6.12.1.d.4 allows for use of a self-reading dosimeter by an individual who is also under the surveillance of radiation protection personnel by means of closed circuit television. No similar TS presently exists.
- 2) In TS 6.12.2, dose rates have been changed from "greater than 1000 mrem/hr" to "greater than 1.0 rem/hr at 30 centimeters, but less than 500 rads/hr at 1 meter." For these areas (designated as a "Locked High Radiation Area" at the DBNPS) the following differences are discussed:
- a) Proposed TS 6.12.2 also allows for the use of a locked gate or other locked barrier instead of a locked door for preventing unauthorized entry, while present TS 6.12.2 only allows the use of a locked door.
 - b) Although the existing TS requires the use of a RWP, it does not specify that a RWP include radiation dose rates in the immediate work areas and other appropriate radiation protection equipment and measures, as proposed TS 6.12.2.b does specify.
 - c) Proposed TS 6.12.2.d.2 allows for entering the area using a radiation monitoring device transmitting dose rate and cumulative dose to a remote receiver monitored by radiation protection personnel, as long as there is the means to communicate with and control every individual in the area. No similar TS allowance presently exists.
 - d) Proposed TS 6.12.2.d.3 allows entering the area with the use of a self-reading dosimeter while being under the surveillance of an individual qualified in radiation protection procedures that is equipped with a radiation monitoring device that continuously displays radiation dose rates in the area, or while being under surveillance by means of a closed circuit television by qualified radiation protection personnel equipped with the means to communicate and control every individual in the area. No similar TS allowance presently exists.
 - e) Proposed TS 6.12.2.f allows for the use of a conspicuous barricade and a clearly visible flashing light as a warning device for a high radiation

area that is within a larger area where no enclosure exists for the purpose of locking and where no enclosure can be reasonably constructed around the high radiation area. No similar TS allowance presently exists.

These changes being proposed to TS 6.12.1 and TS 6.12.2 are TS improvements similar to changes previously approved by the NRC staff for the San Onofre Nuclear Generating Station (SONGS) Units 2 and 3, Operating License Numbers NPF-10 and NPF-15 (Amendments Numbers 127 and 116, dated February 9, 1996; TAC Numbers M86191 and M86192).

TS 6.15.a.2:

The reference to "...10 CFR 20.106..." needs to be updated to "...10 CFR 20.1302...". Under the revised Part 20, Section 20.1302 has replaced Section 20.106 regarding control of radioactivity concentration limits in effluents.

SYSTEMS, COMPONENTS, AND ACTIVITIES AFFECTED:

This proposed License Amendment is administrative in nature and does not affect any plant systems or components. The activities affected by the proposed changes are described below.

TS 6.5.1.6 is affected by the proposed revision that states the SRB is required to review only the changes to and not the entire Industrial Security Plan, the Security Training and Qualification Plan, the Security Contingency Plan, the Emergency Plan, and the Fire Protection Program. As a result, the review responsibilities of the SRB controlled by these TS can be affected.

TS 6.8.4.d and TS 6.15.a.2 are affected by the proposed revisions which provide the updated references to 10 CFR 20.1302 rather than 20.106 for the radioactive effluents controls. TS 6.8.4.d is also corrected editorially by replacing the reference to "Table II" with "Table 2".

TS 6.10.2.e is affected by the proposed revision which provides the correct reference to the USAR table of facility components requiring transient or operational cycle records.

This proposed License Amendment affects the "Administrative Controls" content in Technical Specification 6.11, "Radiation Protection Program," and TS 6.12, "High Radiation Area," regarding the manner in which access to high radiation areas is controlled and personnel exposure to radiation is monitored. As a result, the radiation protection activities controlled by these TS can be affected.

FUNCTIONS OF THE AFFECTED SYSTEMS, COMPONENTS, AND ACTIVITIES:

The overall function of the Operating License, Appendix A, TS, is to impose those conditions or limitations upon reactor operation necessary to preserve the validity of the results of USAR design bases accidents. The overall function of TS 6.0, "Administrative Controls," as stated in 10 CFR 50.36(c)(5) is to provide provisions relating to the organization and management, procedures, record keeping, review and audit, and reporting necessary to assure plant operation in a safe manner.

The function of the present TS 6.5.1.6 is to delineate the responsibilities of the SRB, including the reviews for which the SRB is responsible for performing in order to provide onsite management oversight.

The function of present TS 6.8.4.d is to describe the required elements of the radioactive effluent controls program.

The function of present TS 6.10.2.e is to delineate the plant records required to be maintained for the duration of the Operating License, including the transient or operational cycles experienced by selected components.

The function of the present TS 6.11, "Radiation Protection Program," is to provide requirements for complying with 10 CFR 20, "Standards for Protection Against Radiation." The overall radiation protection program is described in DBNPS USAR Section 12.3, "Health Physics."

The function of the present TS 6.12, "High Radiation Area," is to provide requirements for the control of areas in accordance with 10 CFR Part 20 which are accessible to individuals in which radiation levels are 1000 mrem/hr or less. Controls for high radiation areas in which the intensity of radiation is greater than 1000 mrem/hr are also provided by TS 6.12. The designation of radiation zones and access requirements is described in DBNPS USAR Section 12.1.1.13, "Radiation Zoning and Access Control."

The function of present TS 6.15.a.2 is to provide controls on documenting changes to the offsite dose calculation manual.

EFFECTS ON SAFETY:

TS 6.5.1.6:

The proposed TS changes to TS 6.5.1.6 would require the SRB to review only the changes to the Industrial Security Plan, the Security Training and Qualification Plan, the Security Contingency Plan, the Emergency Plan and the Fire Protection Program instead of reviewing both the plans/program, and the changes thereto. TS 6.5.2.8, "Audits,"

require that the Industrial Security Plan, Emergency Plan, and Fire Protection Program be audited at least once per twelve months. In addition, TS 6.5.2.8 also requires that the performance, training and qualifications of the entire plant staff (including Security) be audited at least once per twelve months. 10 CFR 50.54(p)(3) requires that the security contingency plan be reviewed and audited by individuals independent of both the security program management and staff at least every twelve months. Accordingly, since these plans and program are well-established at the DBNPS and receive audits at least once per twelve months, revising TS 6.5.1.6 to require review only of the change will allow the SRB to focus on the proposed changes and will not have an adverse impact on nuclear safety.

TS 6.8.4.d and 6.15:

The proposed change to TS 6.8.4.d regarding changing "Table II" to "Table 2" is solely editorial. The content of this table has not changed with the referenced 10 CFR Part 20 changes.

The proposed change from referenced "10 CFR 20.106" to "10 CFR 20.1302" in TS 6.8.4.d and TS 6.15 is consistent with the latest 10 CFR Part 20 changes. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas are now provided in 10 CFR 20.1302. The requirements for monitoring, sampling, and analysis of radioactive liquid and gaseous effluents are now also provided in 10 CFR 20.1302. These changes in references administratively update the TS requirements to current regulatory requirements and, accordingly, have no adverse effect on nuclear safety.

TS 6.10.2.e:

The proposed changes from referenced "Table 5.7-1" to "USAR Table 5.1-8" and from "of" to "or" are corrections. License Amendment Number 204, dated December 8, 1995, to the DBNPS Operating License approved the relocation of the content of TS Table 5.7-1 to USAR Table 5.1-8. Therefore, there is no adverse effect on nuclear safety from these changes.

TS 6.11:

10 CFR 50.36 establishes the regulatory requirements for licensees to include TS as part of applications for operating licenses. In addition, the Nuclear Regulatory Commission's "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," dated July 22, 1993 provides guidance regarding the required content of TS. The fundamental purpose of the TS, as described in the NRC's Final Policy Statement, is to impose those conditions or limitations upon reactor operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. This is accomplished by identifying those features that are of

controlling importance to nuclear safety and establishing on them certain TS conditions of operation which cannot be changed without prior NRC approval.

The NRC's Final Policy Statement recognized, as had previous statements related to the NRC Staff's TS Improvement Program, that implementation of the policy would result in the relocation of some existing TS requirements to licensee-controlled documents such as the USAR. Those items relocated to the USAR would, in turn, be controlled in accordance with the requirements of 10 CFR Section 50.59. 10 CFR 50.59 provides criteria to determine when facility or operating changes planned by a licensee require prior NRC approval in the form of a license amendment in order to address any unreviewed safety questions or TS changes.

The proposed removal of the content of TS 6.11 is consistent with the NRC's NUREG-1430, Revision 1, "Improved Standard Technical Specifications for Babcock and Wilcox Plants." Furthermore, NRC regulations 10 CFR Sections 20.1101(b) and (c) require plants to have program procedures to implement Part 20, and to perform a periodic review of the program's content and its implementation. These are specific regulatory controls that exist already outside of the TS and require compliance similar to TS 6.11.

The proposed relocation of the content of TS 6.11 to the USAR (along with the revision of Page XVI of the TS Index) is administrative in nature and does not affect assumptions contained in the plant safety analysis, the physical design, and/or operation of the plant, nor does it affect TS that preserve safety analysis assumptions. The change will have no adverse effect on nuclear safety because the radiation protection program will continue to be described in the USAR Chapter 12 and is required by 10 CFR Part 20.

TS 6.12:

This License Amendment Request proposes that TS 6.12, "High Radiation Area," be revised, consistent with the current revision to 10 CFR Part 20, "Standards for Protection Against Radiation" as published in the Federal Register, dated August 15, 1994. The DBNPS is proposing adopting TS similar to those approved by the NRC for San Onofre Nuclear Generation Station Units 2 and 3 in the referenced License Amendments 127 and 116, respectively.

The proposed changes to TS 6.12.1 and TS 6.12.2 regarding dose rates and the control of entry into high radiation areas, are pursuant to the requirements of 10 CFR 20.1601. The proposed change specifically allowing the opening of high radiation area barriers to permit entry or exit clarifies this restriction. The proposed change requiring that additional details be on a RWP, regarding dose rates and a description of radiation protection equipment and measures, provides for increased personnel awareness. The exemption from requiring a RWP for personnel escorted by health physics personnel is acceptable due to the offsetting requirement that such personnel be "continuously" escorted by health physics personnel who are already exempted. In addition, proposed

changes to TS 6.12.1 and TS 6.12.2 provide for the use of state-of-the-art radiation protection monitoring methods such as closed circuit television and telemetry to reduce personnel entry into high radiation areas. Proposed TS 6.12.2 allows the use of locked barriers other than a locked door (e.g., a locked gate or a locked floor plug) for high radiation areas in order to provide flexibility in controlling the areas without an increase in exposure. The proposed change to TS 6.12.2 regarding the use of an alternative method for controlling access to a high radiation area located within a large area, through the means of a conspicuous barrier and flashing warning light, provides flexibility in controlling access to such areas. These proposed changes provide alternate methods for control of access to high radiation areas, and alternate methods for controlling exposures from external radiation sources in such areas. As discussed above, similar TS changes have been reviewed and found acceptable by the NRC Staff for the San Onofre Nuclear Generating Station. Accordingly, there will be no adverse impact on nuclear safety due to the implementation of these changes.

SIGNIFICANT HAZARDS CONSIDERATION:

The Nuclear Regulatory Commission has provided standards in 10 CFR Section 50.92(c) for determining whether a significant hazard exists due to a proposed amendment to an Operating License for a facility. A proposed amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed changes would: (1) Not involve a significant increase in the probability or consequences of an accident previously evaluated; (2) Not create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) Not involve a significant reduction in a margin of safety. The Davis-Besse Nuclear Power Station has reviewed the proposed changes and determined that a significant hazards consideration does not exist because operation of the Davis-Besse Nuclear Power Station, Unit Number 1, in accordance with these changes would:

- 1a. Not involve a significant increase in the probability of an accident previously evaluated because no accident initiators, conditions or assumptions are affected by the proposed changes to Technical Specification (TS) 6.5.1.6, "[Station Review Board] Responsibilities;" TS 6.8.4.d, "Radioactive Effluents Control Program;" TS 6.10, "Record Retention;" TS 6.11, "Radiation Protection Program;" TS 6.12, "High Radiation Area;" and TS 6.15, "Offsite Dose Calculation Manual (ODCM)."

These changes proposed to TS 6.5.1.6, TS 6.8.4.d, TS 6.10, and TS 6.15 are administrative changes that improve or update the content of TS Section 6.0, "Administrative Controls."

The change proposed to TS 6.11 would relocate its content to the DBNPS Updated Safety Analysis Report, thereby removing it from the TS consistent with

the NRC's NUREG-1430, Revision 1, "Improved Standard Technical Specifications for Babcock and Wilcox Plants."

The changes proposed to TS 6.12 are based upon the current revision to 10 CFR Part 20, "Standards for Protection Against Radiation," as published in the Federal Register, dated August 15, 1994, and TS approved by the NRC for the San Onofre Nuclear Generating Station Units 2 and 3 in Operating License Amendments 127 and 116, respectively. The changes to TS 6.12 also provide for the use of alternative methods for controlling access to high radiation areas and state-of-the-art radiation protection monitoring methods, such as closed circuit television and telemetry.

Under the proposed changes, the TS would continue to satisfy the applicable requirements of 10 CFR 50.36(c)(5).

- 1b. Not involve a significant increase in the consequences of an accident previously evaluated because no accident conditions or assumptions are affected by the proposed changes. As described above, these changes are administrative changes or are proposed pursuant to the current revision to 10 CFR Part 20, "Standards for Protection Against Radiation." The proposed changes do not alter the source term, containment isolation, or allowable releases. The proposed changes, therefore, will not increase the radiological consequences of a previously evaluated accident.
2. Not create the possibility of a new or different kind of accident from any accident previously evaluated because no new accident initiators or assumptions are introduced by the proposed changes. As described above, these changes are administrative changes or are proposed pursuant to the current revision to 10 CFR Part 20, "Standards for Protection Against Radiation."
3. Not involve a significant reduction in a margin of safety because the proposed changes are administrative changes or are proposed pursuant to the current 10 CFR Part 20 requirements. These proposed changes do not reduce or adversely affect the capabilities of any plant structures, systems or components.

CONCLUSION:

On the basis above, the Davis-Besse Nuclear Power Station has determined that the License Amendment Request does not involve a significant hazards consideration. Furthermore, as this License Amendment Request concerns proposed changes to the Technical Specifications that must be reviewed by the Nuclear Regulatory Commission, this License Amendment Request does not constitute an unreviewed safety question.

ATTACHMENT:

Attached are the proposed marked-up changes to the Operating License.

REFERENCES:

1. Technical Specification (TS) 6.5.1.6, "[Station Review Board] Responsibilities;" TS 6.8.4.d, "Radioactive Effluents Control Program;" TS 6.10, "Records Retention;" 6.11, "Radiation Protection Program;" and TS 6.12, "High Radiation Area;" and TS 6.15, "Offsite Dose Calculation Manual (ODCM)."
2. NRC "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," (58 FR 39132, dated July 22, 1993).
3. NRC's Staff Safety Evaluation for Amendment Numbers 127 and 116 (NRC TAC Numbers M86191 and M86192) to the Operating License (Numbers NPF-10 and NPF-15) for the San Onofre Nuclear Generation Station Units 2 and 3, dated February 9, 1996.
4. 10 CFR 20, "Standards for Protection Against Radiation," Subpart G - "Control of Exposure from External Sources in Restricted Areas," Sections 20.1601, "Control of Access to High Radiation Areas."
5. 10 CFR 20, "Standards for Protection Against Radiation," Subpart B - "Radiation Protection Programs," Section 20.1101, "Radiation Protection Programs."
6. 10 CFR 20, "Standards for Protection Against Radiation," Subpart D - "Radiation Dose Limits for Individual Members of the Public," Section 20.1302, "Compliance with Dose Limits for Individual Members of the Public."
7. 10 CFR 50.36, "Technical Specifications."
8. 10 CFR 50.59, "Changes, Tests, and Experiments."
9. Chapter 12, "Radiation Protection" of the DBNPS Updated Safety Analysis Report (USAR), through Revision 20.
10. DBNPS Operating License NPF-3, Appendix A, Technical Specifications, through Amendment 226.
11. NUREG - 1430, Revision 1, "Improved Standard Technical Specifications for Babcock and Wilcox Plants," dated April 7, 1995.