

A T T A C H M E N T A

Revise the Technical Specifications as follows:

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TABLE 3.3-6
RADIATION MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>SETPOINT#</u>	<u>MEASUREMENT RANGE</u>	<u>ACTION</u>
1. AREA MONITORS					
a. Fuel Storage Pool Area (RM-207)	1	*	≤ 15 mR/hr	$10^{-1} - 10^4$ mR/hr	19
b. Containment					
i. Purge & Exhaust Isolation (RMVS 104 A & B)	1	6	$\leq 1.6 \times 10^3$ cpm	$10 - 10^6$ cpm	22
ii. Area (RM-RM-219A & B)	2	1, 2, 3 & 4	≤ 1600 R/hr	$1 - 10^7$ R/hr	36
2. PROCESS MONITORS					
a. Containment					
i. Gaseous Activity RCS leakage Detection (RM 215B)	1	1, 2, 3 & 4	N/A	$10 - 10^6$ cpm	20
ii. Particulate Activity RCS leakage Detection (RM 215A)	1	1, 2, 3 & 4	N/A	$10 - 10^6$ cpm	20
b. Fuel Storage Building Gross Activity (RMVS - 103A & B)	1	**	$\leq 4.0 \times 10^4$ cpm	$10 - 10^6$ cpm	21

* With fuel in the storage pool or building

** With Irradiated fuel in the storage pool

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TABLE 3.3-6 (Cont'd)
RADIATION MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABLE MODES</u>	<u>SETPOINT#</u>	<u>MEASUREMENT RANGE</u>	<u>ACTION</u>
PROCESS MONITORS (Cont'd)					
c. Noble Gas Effluent Monitors					
i. Supplementary Leak Collection and Release System (RM-VS-110 Ch. 7 & Ch. 9) ***	1	1, 2, 3, & 4	$\leq 6.6 \times 10^1$ cpm	$10^{-2} - 10^5$ uCi/cc*	36
ii. Auxiliary Building Ventilation System (RM-VS-109 CH. 7 & Ch. 9) ***	1	1, 2, 3 & 4	$\leq 5.5 \times 10^1$ cpm	$10^{-2} - 10^5$ uCi/cc*	36
iii. Process Vent System (RM-GW-109 Ch. 7 & Ch. 9) ***	1	1, 2, 3 & 4	$\leq 3.1 \times 10^4$	$10^{-2} - 10^5$ uCi/cc**	36
iv. Atmospheric Steam Dump Valve and Code Safety Relief Valve Discharge (RM-MS-100 A, B, C)	1/SG	1, 2, 3 & 4	$\leq 5.0 \times 10^1$ cpm	$10^{-1} - 10^3$ uCi/cc	36
v. Auxiliary Feedwater Pump Turbine Exhaust (RM-MS-101)	1	1, 2, 3 & 4	$\leq 5.0 \times 10^1$ cpm	$10^{-1} - 10^3$ uCi/cc	36

* Nominal range for Ch. 7 and Ch. 9. Alarm set on Ch. 7

** Nominal range for Ch. 7 and Ch. 9. Alarm set on Ch. 9

*** Other SPING-4 channels not applicable to this specification

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TABLE 3.3-8

METEOROLOGICAL MONITORING INSTRUMENTATION

<u>INSTRUMENT</u>	<u>INSTRUMENT MINIMUM ACCURACY</u>	<u>MINIMUM OPERABLE</u>
1. WIND SPEED		
a. Nominal Elev. 500'	± 0.5 mph*	Any
b. Nominal Elev. 150'	± 0.5 mph*	3 of 6
c. Nominal Elev. 35'	± 0.5 mph*	
2. WIND DIRECTION		
a. Nominal Elev. 500'	$\pm 5^\circ$	Any
b. Nominal Elev. 150'	$\pm 5^\circ$	3 of 6
c. Nominal Elev. 35'	$\pm 5^\circ$	
3. AIR TEMPERATURE ΔT		
a. ΔT Elev. 500' - 35'	$\pm 0.1^\circ\text{C}$	Any
b. ΔT Elev. 150' - 35'	$\pm 0.1^\circ\text{C}$	2 of 4

* Starting speed of anemometer shall be < 1 mph.

TABLE 3.3-13, (Cont'd)

TABLE NOTATION

ACTION 27 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, the contents of the tank may be released to the environment provided that prior to initiating the release:

1. At least two independent samples of the tank contents are analyzed, and at least two technically qualified members of the facility staff independently verify the release rate calculations and discharge valve lineup.

or

2. Initiate continuous monitoring with a comparable alternate monitoring channel. Surveillance Requirements applicable to the inoperable channel shall apply to the comparable alternate monitoring channel when used to satisfy this technical specification requirement.

Otherwise, suspend release of radioactive effluents via this pathway.

ACTION 28 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided the flow rate is estimated at least once per 4 hours.

ACTION 29 - With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, effluent releases via this pathway may continue provided:

1. Grab samples are taken at least once per 8 hours and these samples are analyzed for gross activity within 24 hours.

or

2. Initiate continuous monitoring with a comparable alternate monitoring channel. Surveillance Requirements applicable to the inoperable channel shall apply to the comparable alternate monitoring channel when used to satisfy this technical specification requirement.

ACTION 30 - With the number of channels OPERABLE less than required by Minimum Channels OPERABLE requirement, immediately suspend PURGING of Reactor Containment via this pathway if both RM-VS-104A and B are not operable with the purge/exhaust system in service.

ATTACHMENT B

Proposed Technical Specification Change No. 124 No Significant Hazard Considerations

Description of amendment request: Change Request No. 124 would revise applicable radiation monitoring instrumentation setpoints in Table 3.3-6, revise the meteorological monitoring instrumentation in Table 3.3-8 to include both the Primary and Redundant instruments, and revise Action statements 27 and 29 in Table 3.3-13 to allow an alternative to grab sampling by providing for initiation of continuous monitoring by alternate monitoring equipment.

Table 3.3-6, Radiation Monitoring Instrumentation, pages 3/4 3-34 and 3/4 3-34a

The setpoints for the Radiation Monitoring Instruments were established in 1982 to correspond to an effluent release concentration at which the emergency plan Emergency Action Levels (EAL) at the site boundary would be reached, using a worst-case X/Q and the FSAR design routine effluent release nuclide mix for that pathway. The emergency plan General Emergency EALs were revised downward in 1985 to the current values of 125 mR/hr or 1 rem whole body, and 600 mR/hr or 5 rem child thyroid. This reduced each value by a factor of about 5. In addition, work was performed which resulted in changes to the gaseous effluent monitor response efficiencies. Based on the above, a change to the alarm setpoints was warranted. In developing the revised setpoints, the following additional considerations were also addressed as applicable to the particular monitor:

1. The X/Q was revised from the original $1.58\text{E-}3 \text{ sec/m}^3$ to $8.91\text{E-}4 \text{ sec/m}^3$, this later value was developed during the reanalysis of the DBA LOCA.
2. Arrange alarm setpoints on a consistent basis from general emergency, one hour release, to a site boundary dose of 1 rem whole body, 5 rem thyroid. (The existing values have varied bases -- some site emergency, some general emergency). For all cases now the alarm interpretation is "A radioactivity release is occurring that has the potential of creating a need for offsite protective actions. If verification (eg.: dose projections) does not show within 15 minutes that this is not the case, declare a general emergency, and recommend protective actions".
3. Change the source term to reflect the most restrictive emergency source term for the applicable release point. This was determined by calculating alarm setpoints for all combinations of monitors and emergency source terms, discounting those incongruent combinations, and then selecting the lowest alarm setpoint from the remaining combinations.

The most significant setpoint change was for the containment high range monitor. The setpoint basis for this monitor was increased by a factor of about 50 (a factor of $1.58\text{E-}3/8.91\text{E-}4 = 1.77$ for the X/Q change, and a factor of $5000 \text{ mrem}/170 \text{ mrem} = 29.41$ for the child thyroid dose reduction from Site Area Emergency EAL to General Emergency EAL). The setpoints for the remaining effluent monitors differ from the previous setpoints due to the combination of EAL, source term, and efficiency changes.

ATTACHMENT B (Continued)

Table 3.3-8, Meteorological Monitoring Instrumentation, page 3/4 3-42

This table was revised to add the redundant instruments to allow more flexibility when satisfying the minimum instrumentation operability requirements. The minimum operability requirements for air temperature delta - T were doubled from 1 of 2 to 2 of 4 to include the Redundant instruments. The minimum operability requirements for wind speed and wind direction were changed from 2 of 3 to 3 of 6 to allow loss of Primary or Redundant instruments or combinations of instruments at the various elevations. However, the operability requirement for a minimum of 3 of the 6 available instruments will ensure that information at more than one elevation will be available for assessing doses during emergency situations.

Table 3.3-13, Action Statements 27 and 29, page 3/4 3-63

These Action statements have been revised to provide an alternative to grab sampling. In lieu of grab sampling continuous monitoring would be provided by the use of alternate monitoring equipment with comparable capabilities. In addition, while the alternate monitoring equipment is being used to satisfy the technical specification requirements, applicable surveillance requirements would be applied to the alternate equipment to ensure continued operability.

Basis for no significant hazard determination: Based on the criteria for determining whether a significant hazards consideration exists as set forth in 10CFR50.92(c), plant operation in accordance with the proposed amendment would not:

- (1) Involve a significant increase in the probability of occurrence or the consequences of an accident previously evaluated because: The changes to the radiation monitor alarm setpoints have been incorporated to provide consistency with the revised Emergency Action Levels (EAL) and thus improve emergency response actions. These instruments provide alarms only and do not perform control functions. The addition of the Redundant meteorological monitoring instruments provides an additional set of instruments to allow more flexibility when satisfying the minimum instrument operability requirements. The minimum number of instruments required to be operable has been increased to include the additional instruments and the surveillance requirements remain unchanged. The revised action statements of Table 3.3-13 incorporate an option to allow monitoring with comparable alternate monitoring instruments. Surveillance requirements that would have been applied to the primary technical specification channel are then applied to the alternate monitoring instruments. This will ensure that operability of the alternate monitoring instruments is comparable to that required for the technical specification instruments. Therefore, there is no reduction in the quality of the instruments monitoring these effluent pathways. These changes do not increase the probability of occurrence or the consequences of accident previously evaluated and do not affect the UFSAR accident analysis of Section 14.

ATTACHMENT B (Continued)

- (2) Create the possibility of a new or different kind of accident from any accident previously evaluated because: The instruments addressed by the proposed changes do not perform control functions. The alarm setpoint changes provide consistency with the associated Emergency Action Levels to provide improved emergency response actions. The revised action statements provide an option to the use of grab samples when an effluent monitor is inoperable. These changes do not affect the UFSAR system descriptions of Section 11.
- (3) Involve a significant reduction in the margin of safety because: The applicable radiation and meteorological monitoring instruments will continue to perform the intended functions, will be maintained in accordance with design requirements and will not affect the Bases for any technical specification.

Conclusion

The proposed changes do not involve any physical change to plant safety related systems, components or structures, will not increase the likelihood of a malfunction of safety related equipment, increase the consequences of an accident previously analyzed, nor create the possibility of a malfunction different than previously evaluated. The function and operation of the monitors remains unchanged. Therefore, based on the above, the changes have been determined to be administrative in nature and it is proposed to characterize the change as involving no significant hazards consideration.