# Attachment 1

Haddam Neck Plant Proposed Revision to Technical Specifications Administrative Controls--High Radiation Area

# 6.11 RADIATION PROTECTION PROGRAM

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.

6.12 SUPERSEDED BY 10 CFR 20.103(c) and (f) ON DECEMBER 28, 1977

## 6.13 HIGH RADIATION AREA

- 6.13.1 Pursuant to paragraph 20.203(c)(5) of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph 20.203(c), each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Health Physics Technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:
  - a. A radiation monitoring device which continuously indicates the radiation dose rate in the area; or
  - b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or
  - An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Health Physics Supervisor in the RWP.
- 6.13.2 In addition to the requirements of Specification 6.13.1, areas accessible to personnel with radiation levels greater than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as

closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mR/h that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

## Attachment 2

Millstone Nuclear Power Station, Unit No. 1 Proposed Revision to Technical Specifications Administrative Controls--High Radiation Area

#### 6.12 HIGH RADIATION AREA

- Pursuant to paragraph 20.203(c)(5) of 10 CFR Part 20, in lieu of the 6.12.1 "control device" or "alarm signal" required by paragraph 20.203(c), each high radiation area, as defined in 10 CFR Part 2C, in which the intensity of radiation is equal to or less than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Health Physics Technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:
  - a. A radiation monitoring device which continuously indicates the radiation dose rate in the area; or
  - b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or
  - c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Health Physics Supervisor in the RWP.
- 6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or Health Physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed-circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

## ADMINISTRATIVE CONTROLS

For individual high radiation areas accessible to personnel with radiation levels greater than 1000 mR/h that are located within large areas where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

### 6.13 SYSTEMS INTEGRITY

The licensee shall implement a program to reduce leakage from systems outside containment that would, or could, contain highly radioactive fluids during a serious transient, or accident, to as low as practical levels. This program shall include the following:

- Provisions establishing preventive maintenance and periodic visual inspection requirements, and
- 2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

#### 6.14 IODINE MONITORING

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,

2. Procedures for monitoring, and

3. Provisions for maintenance of sampling and analysis equipment.

# 6.15 RADIOLOGICAL EFFLUENT MONITORING AND OFFSITE DOSE CALCULATION MANUAL (REMODEM)

Section I, Radiological Effluent Monitoring Manual, shall outline the sampling and analysis programs to determine the concentration of radioactive materials released offsite at well as dose commitments to individuals in those exposure pathways and for those radionuclides released as a result of station operation. It shall also specify operating guidelines for radioactive waste treatment systems and report content.

Changes in Section I shall be submitted to the Commission for approval prior to implementation.

Section II, the Offsite Dose Calculation Manual (ODCM), shall describe the methodology and parameters to be used in the calculation of offsite doses due to radioactive gaseous and liquid effluents and in the calculation of gaseous and liquid effluent monitoring instrumentation alarm/trip setpoints consistent with the applicable LCO's contained in these technical specifications.

Changes to Section II need not be submitted to the Commission for approval prior to implementation, but shall be included in the next Semi-Annual Radio-active Effluent Release Report.

## 6.16 RADIOACTIVE WASTE TREATMENT

Procedures for liquid and gaseous radioactive effluent discharges from the Unit shall be prepared, approved, maintained, and adhered to for all operations involving offsite releases of radioactive effluents. These procedures shall specify the use of approprate\* waste treatment utilizing the guidance provided in the REMODOM.

<sup>\*</sup>The solid radioactive waste treatment system shall be operated in accordance with the Process Control Program to process wet radioactive wastes to meet shipping and burial ground requirements.

# Attachment 3

Millstone Nuclear Power Station, Unit No. 2 Proposed Revision to Technical Specifications Administrative Controls--High Radiation Area

## ADMINISTRATIVE CONTROLS

- g. Records of training and qualification for current members of the plant staff.
- h. Records of inservice inspections performed pursuant to these Technical Specifications.
- Records of quality assurance activities required by the QA Manual.
- Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR Part 50.59.
- k. Records of meetings of the PORC, the NRC, the SORC and the SNRB.
- 1. Records of Environmental Qualification which are covered under the provisions of paragraph 6.13.

# 6.11 RADIATION PROTECTION PROGRAM

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.

## 6.12 HIGH RADIATION AREA

- 6.12.1 Pursuant to paragraph 20.203(c)(5) of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph 20.203(c), each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Health Physics Technician) or personnel continuously escorted by such individuals may be exempted from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for antry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:
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  - b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or

### ADMINISTRATIVE CONTROLS

c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Health Physics Supervisor in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or Health Physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed-circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

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