HOLTEC PALISADES, LLC

HOLTEC DECOMMISSIONING INTERNATIONAL, LLC

DOCKET NO. 50-155

BIG ROCK POINT PLANT

FACILITY OPERATING LICENSE

License No. DPR-06

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for a license amendment by Holtec Palisades, LLC (Holtec Palisades) and Holtec Decommissioning International, LLC (HDI), (the licensees), complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;

   B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance that: (i) the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the rules and regulations of the Commission;

   D. The licensees are technically and financially qualified to engage in the activities authorized by this operating license in accordance with the rules and regulations of the Commission;

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the rules and regulations of the Commission and all applicable requirements have been satisfied;

   F. The licensees have satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;

   G. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   H. The receipt, possession, and use of source, byproduct, and special nuclear material as authorized by this license will be in accordance with the Commission's regulations in 10 CFR Parts 30, 40, and 70, including 10 CFR Sections 30.33, 40.32, 70.23, and 70.31.

2. Facility Operating License No. DPR-06, is hereby issued to Holtec Palisades and HDI in its entirety to read as follows:

A. This license applies to the Big Rock Point Plant (the facility) owned by Holtec Palisades. The facility is located in Charlevoix County, Michigan, and is described in the licensee's application dated January 14, 1960, and the Final Hazards Summary Report, as supplemented, updated, and amended by subsequent filings by the licensee.

B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses Holtec Palisades and HDI:

B.(1) Pursuant to Section 104b of the Act and 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," to possess the facility at the designated location in Charlevoix County, Michigan, in accordance with the procedures and limitations set forth in this license;

B.(2) Pursuant to the Act and 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material," to possess at any one time up to: a) 2500 kilograms of contained uranium-235 in fuel rods, b) 10.32 grams of uranium-235 as contained in fission counters, c) 150 kilograms of plutonium contained in PuO_2-UO_2 fuel rods, and d) 5 curies of plutonium encapsulated as a plutonium-beryllium neutron source,

(a) Deleted
(b) Deleted
(c) Deleted
(d) Deleted
(e) Deleted
(f) Deleted
(g) Deleted

B.(3) Pursuant to the Act and 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material," to receive, possess, and use at any one time up to 7000 curies of antimony-beryllium in the form of neutron sources, 3.7 curies of cobalt-60 as sealed sources, 45 curies of cesium-137 as sealed sources, 10 microcuries of miscellaneous alpha-emitting material as sealed sources, and up to 500 millicuries per nuclide of any byproduct material between atomic numbers 1 and 83, inclusive, without restriction as to chemical and physical form;

B.(4) Pursuant to the Act and 10 CFR Part 40, "Domestic Licensing of Source Material," to possess at any one time up to 500 kilograms of depleted uranium dioxide contained in the facility's fuel assemblies;

B.(5) Pursuant to the Act and 10 CFR Parts 30 and 70, to possess. but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility

C. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

C.(1) Reactor Operation

The reactor is not licensed for power operation. Fuel shall not be placed in the reactor vessel.

C.(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 129, are hereby incorporated in the license. HDI shall maintain the facility in accordance with the Technical Specifications.

C.(3) Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the physical security, guard training and qualification, and safeguards contingency plans approved by the Commission and all amendments and revisions to such plans made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p), as modified by NRG-approved exemptions. The plan, which contains safeguards information protected under 10 CFR 73.21, is entitled: “Big Rock Point ISFSI Security Plan,” as submitted on July 31, 2001, and modified by letter dated March 6, 2002. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

C.(4) License Termination Plan

The License Termination Plan (LTP) dated April 1, 2003, as supplemented by LTP, Rev. 1, dated July 1, 2004, is approved by NRC License Amendment No. 126.

In addition to those criteria specified in 10 CFR 50.59, 10 CFR 50.82(a)(6), and 10 CFR 50.82(a)(7), changes to the approved LTP shall require NRC approval prior to being implemented if the change:

(a) Increases in radionuclide-specific derived concentration guideline levels of area factors (discussed in Chapter 6 of the LTP);

(b) Increases the probability of making a Type I decision error above the level stated in the LTP (discussed in Chapter 5 of the LTP);

(c) Increases the investigation level thresholds for a given survey unit classification (as given in Table 5-7 of the LTP);

(d) Changes the classification of a survey unit from a more restrictive classification to a less restrictive classification (e.g., Class 1 to Class 2). Definitions for the different classifications for surface soils are provided in Chapter 5 of the LTP;

(e) Reduces the overage requirements for scan measurements (Table 5-4 of the LTP); or

(f) Involves reliance upon statistical tests other than the Sign test (as discussed in Chapter 5 of the LTP) for data evaluation.

Prior to a request to release a survey area from the license, the licensees shall assure that the site is in compliance with the dose-based release criteria per the process described in Chapter 5 of the LTP.

The licensees shall submit an updated LTP in accordance with 10 CFR 50.71(e).

The licensees may make changes to the LTP without prior NRC approval using the 10 CFR 50.59 process.

C.(5) Deleted

C.(6) Deleted

C.(7) Deleted

D. The amendment becomes effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Keith I. McConnell, Deputy Director
Decommissioning and Uranium Recovery
Licensing Directorate
Division of Waste Management and
Environmental Protection

Date of Issuance: April 11, 2007

DEFINITIONS

1.1 ACTION

ACTION shall be that part of a specification which prescribes remedial measures required under designated conditions.

1.2 CHANNEL CALIBRATION

A CHANNEL CALIBRATION is the adjustment as necessary, of the channel output such that the channel responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and includes the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping, or total channel steps such that the entire channel is calibrated.

1.3 CHANNEL CHECK

A CHANNEL CHECK is the qualitative assessment of channel behavior during operation by observation. This assessment shall include, where possible comparison of the channel indication and/or status with other indications and/or status derived from independent instrumentation channels measuring the same parameter.

1.4 CHANNEL FUNCTIONAL TEST

A CHANNEL FUNCTIONAL TEST is the injection of a simulated signal into the channel as close to the sensor as practicable to verify performance, including alarm and trip functions.

1.5 IMMEDIATELY

When “IMMEDIATELY” is used as a completion time for a required ACTION, the ACTION should be pursued without delay and in a controlled manner.

1.6 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 effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring programs required by Sections 6.5.2.4 and 6.5.2.5 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.6.2 and 6.6.3.

DEFINITIONS

1.7 PROCESS CONTROL PROGRAM (PCP)

The PROCESS CONTROL PROGRAM contains the methods and determinations which ensure that the processing and packaging of wet solid radioactive 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.

1.8 REPORTABLE EVENT

A REPORTABLE EVENT is any of those conditions specified as reportable in Specification 6.8.

2.0 SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

There are no safety limits or limiting safety system settings applicable to the permanently defueled condition.

3 / 4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3 / 4.0 APPLICABILITY

LIMITING CONDITIONS FOR OPERATION

3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.

3.0.2 Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.

3.0.3 Unless otherwise specified, entry into an applicability condition shall not be made unless the conditions of the associated Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements.

SURVEILLANCE REQUIREMENTS

4.0.1 Unless specified otherwise, Surveillance Requirements shall be applicable during the specified applicable conditions for the associated Limiting Conditions for Operation.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

4.0.3 Unless specified otherwise, performance of a Surveillance Requirement within the specified time interval including the maximum allowable extension shall constitute compliance with associated ACTION statements.

4.0.4 Unless specified otherwise, entry into a specified applicable condition shall not be made unless the Surveillance Requirements associated with the Limiting Condition for Operation have been performed within the stated surveillance interval including the maximum allowable extension.

3 / 4.1 SEALED SOURCE CONTAMINATION

LIMITING CONDITIONS FOR OPERATION

3.1 Each sealed source containing more than 100 microcuries of beta and/or gamma emitting material, or more than 5 microcuries of alpha emitting material shall not have removable contamination which equals or exceeds 0.005 microcuries.

APPLICABILITY: At all times.

ACTION: 1. Each sealed source with removable contamination in excess of the above limits shall be IMMEDIATELY withdrawn from use and either decontaminated and repaired, or disposed of in accordance with NRC regulations.

a. A special report shall be submitted to the NRC as indicated by Specification 6.6.4.a.

SURVEILLANCE REQUIREMENTS

4.1 Except for: 1) sealed sources which are stored and not in use, and 2) start up sources and fission detectors previously subjected to core neutron flux, sealed sources containing radioactive materials in any form other than gas and with a half-life greater than 30 days (excluding $1H^3$) shall be tested for contamination and/or leakage at least once per six months by the licensee or other person specifically authorized by the NRC or an Agreement State to perform such services. The test method shall have a detection sensitivity of at least 0.005 microcuries per test sample. The test sample shall be taken from the sealed source or from the surfaces of the device in which the sealed source is permanently mounted or stored, on which one might expect contamination to accumulate. Records of leak test results shall be kept in units of microcuries and maintained for inspection by the NRC.

a. Sealed sources requiring testing by this section, but exempted on the basis of not being in use, shall have been tested within 6 months prior to being transferred or put into use.

5.0 DESIGN FEATURES

5.1 SITE

5.1.1 LOCATION AND BOUNDARIES

The plant site is located in Charlevoix County, Michigan, about 4 miles northeast of Charlevoix, Michigan, and about 11 miles west of Petoskey, Michigan.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY AND AUTHORITY

6.1.1 SENIOR NUCLEAR OFFICER

The Senior Nuclear Officer shall be the HDI President and shall be responsible for the overall operation, maintenance and decommissioning of the Big Rock Point nuclear power plant.

6.1.2 SITE GENERAL MANAGER

The site general manager shall be responsible for overall facility operation, maintenance and decommissioning and for periods of absence shall delegate in writing the succession to this responsibility. Unless otherwise specified, the site general manager's delegate has authority to perform all actions and grant approvals assigned by these specifications to the site general manager. The site general manager may delegate specific tasks to other individuals who may perform those tasks whether the site general manager is absent or present at the site.

6.2 ORGANIZATION

6.2.1 REPORTING RELATIONSHIPS

Onsite organization and corporate reporting relationship shall be established as described in the Quality Program Description for Big Rock Point.

6.2.2 FACILITY ORGANIZATION

The site general manager or his designate shall verify that required security staffing and Dry Fuel Storage Technical Specification surveillance(s) have been met.

6.0 ADMINISTRATIVE CONTROLS

6.3 STAFF QUALIFICATIONS

Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 for comparable positions with exceptions specified in the Quality Assurance Program Manual (QAPM).

6.4 REVIEW AND AUDIT

Requirements for onsite and offsite reviews and audits are described in the Quality Program Description for Big Rock Point.

6.0 ADMINISTRATIVE CONTROLS

6.5 PROCEDURES AND PROGRAMS

6.5.1 PROCEDURES

6.5.1.1 Scope

Written procedures shall be established, implemented and maintained for quality related activities defined in the Big Rock Point Decommissioning Quality List and shall meet or exceed the requirements described by the Quality Program Description.

Written procedures shall also be established, implemented, and maintained covering the following activities:

a. ISFSI Security Plan;
b Emergency Plan;
c. Fire Protection Plan;
d. Quality Program Description; and
e. Radiation Protection Program.

6.5.1.2 Review and Approval

Requirements for review and approval of procedures (and revisions thereto) required by this section are described in the Quality Program Description.

6.5.1.3 Temporary Changes

Requirements for making temporary changes to procedures which fall within the scope of this section are described in the Quality Program Description.

6.5.2 PROGRAMS

The following programs shall be established, implemented and maintained in accordance with written procedures meeting the requirements contained in Specification 6.5.1.

6.5.2.1 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.

6.0 ADMINISTRATIVE CONTROLS

6.5.2.1.1 High Radiation Area

6.5.2.1.1.1 Dose Rates less than or equal to 1000 Millirem per Hour

In lieu of the "control device" or "alarm signal" required by Paragraph 20.1601(a) of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than or equal to 1000 mrem/hr at 30 cm (12 inches) 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 the use of a Radiation Work Permit (RWP). Radiation protection qualified personnel or personnel continuously escorted by radiation protection qualified personnel may be exempt from working under an RWP during the performance of their assigned radiation protection duties in high radiation areas with exposure rates of less than or equal to 1000 mrem/hr, provided they are otherwise following facility 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 may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them, or

c. A radiation protection qualified individual (e.g., Radiation Protection Technician) with a radiation dose rate monitoring device, responsible or providing positive control over the activities within the area.

6.5.2.1.1.2 Dose Rates greater than 1000 Millirem per Hour

In addition to the requirements of 6.5.2.1.1.1, areas accessible to personnel with radiation levels greater than 1000 mrem/hr at 30 cm (12 inches) but less than 500 rad/hr at 1 meter 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 administrative controls specified in the facility administrative procedures. 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 a stay time specification, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation

6.0 ADMINISTRATIVE CONTROLS

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 greater than 1000 mrem/hr that are located within large areas where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

6.5.2.2 Process Control Program (PCP)

6.5.2.2.1 Changes to the PCP

Changes to the PCP shall become effective after approval by the Site General Manager.

6.5.2.2.2 Reports

Changes to the PCP shall be submitted to the Commission in the Radioactive Effluent Release Report for the period in which the changes were made effective. This submittal shall contain sufficiently detailed information to support the rationale for each change and a determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes.

6.5.2.3 Offsite Dose Calculation Manual (ODCM)

6.5.2.3.1 Changes to the ODCM

Changes to the ODCM shall become effective after approval by the Site General Manager.

6.5.2.3.2 Reports

Changes to the ODCM shall be submitted to the Commission in the Radioactive Effluent Release Report for the period in which the changes were made effective. This submittal shall contain sufficiently detailed information to support the rationale for each change and a determination that the change did not reduce the accuracy or reliability of dose calculations or setpoint determinations.

6.0 ADMINISTRATIVE CONTROLS

6.5.2.4 Radioactive Effluent Controls Program

A program, conforming with 10 CFR 50.36a, for the control of radioactive effluents and for maintaining doses from radioactive effluents to members of the public as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by facility procedures, and (3) shall include remedial actions to be taken whenever program limits are exceeded. The program shall include the following elements:

a. Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;

b. Limitations conforming to 10 times the concentration values specified in Appendix B, Table 2, Column 2, to 10 CFR 20.1001 - 20.2402 for the radioactive material release in liquid effluents to unrestricted areas.

c. Monitoring, sampling and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;

d. Limitations conforming to Appendix I to 10 CFR Part 50 on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from the facility to unrestricted areas;

e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;

f. Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50.

g. The dose rate due to radioactive materials released in gaseous effluents from the site to areas at or beyond the site boundary shall be limited to the following:

   (a) For noble gases: Less than or equal to 500 mrems/yr to the total body and less than or equal to 3000 mrems/yr to the skin, and

6.0 ADMINISTRATIVE CONTROLS

(b) For tritium and for all radionuclides in particulate form with half lives greater than 8 days: Less than or equal to 1500 mrems/yr to any organ.

h. Limitations conforming to Appendix I to 10 CFR Part 50 on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the facility to areas beyond the site boundary; and

i. Limitations conforming to 40 CFR Part 190 on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources.

j. The dose to a member of the public from tritium and all radionuclides in particulate form with half lives greater than 8 days in gaseous effluents released to areas at or beyond the site boundary shall be limited to the following:

(a) During any calendar quarter: Less than or equal to 7.5 mrems to any organ, and

(b) During any calendar year: Less than or equal to 15 mrems to any organ.

6.5.2.5 Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the facility. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

a. Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM;

b. A Land Use Census to ensure that changes in the use of areas at and beyond the site boundary are identified and that modifications to the monitoring program are made if required by the results of this census, or alternatively, that critical receptors are assumed to exist at the site boundary or offsite location of highest dose consequence; and

6.0 ADMINISTRATIVE CONTROLS

c. Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

6.6 REPORTING REQUIREMENTS

The reports identified in this section shall be submitted in accordance with 10 CFR 50.4.

6.6.1 ANNUAL OCCUPATIONAL RADIATION EXPOSURE REPORT

An annual report of radiation exposures received during the previous calendar year shall be submitted prior to March 1 of each year. This report shall tabulate the numbers of facility, utility and other personnel (including contractors) receiving exposures greater than 100 millirem during the year, along with their associated dose according to work and job functions, for example, operations and surveillance, routine maintenance, special maintenance (identify), and waste processing. The dose assignments to various duty functions may be estimated based on pocket dosimeter, TLD or film badge measurements. Small exposures totaling less than 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total whole body dose received from external sources should be assigned to specific major work functions.

6.6.2 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

An annual radiological environmental operating report covering operation of the facility during the previous calendar year shall be submitted prior to May 1 of each year. The report shall include summaries, interpretations, and statistical evaluation of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the ODCM and Sections IV.B.2, IV.B.3 and IV.C of Appendix I to 10 CFR 50.

6.0 ADMINISTRATIVE CONTROLS

6.6.3 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

An annual radioactive effluent release report covering operation of the facility during the previous calendar year shall be submitted prior to May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the facility. The material provided shall be consistent with the objectives outlined in the ODCM and the PROCESS CONTROL PROGRAM, and shall comply with the requirements of 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

6.6.4 SPECIAL REPORTS

The following special report shall be submitted to the NRC as indicated.

a. If the sealed source contamination limits of Specification 3.1 are exceeded, a special report shall be submitted to the NRC within 30 days of identification of the existence of the excessive contamination. The report shall describe the equipment involved, the test results and corrective actions taken.

6.7 RECORDS

Record retention requirements are described in the Quality Program Description for Big Rock Point.

6.8 REPORTABLE EVENTS

A reportable event is any event or condition that must be reported to the NRC in accordance with 10 CFR 50.72, 10 CFR 50.73, 10 CFR 50.9(b), or 10 CFR 72.75.