



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 66 TO FACILITY OPERATING LICENSE NO. NPF-86

NORTH ATLANTIC ENERGY SERVICE CORPORATION

SEABROOK STATION, UNIT NO. 1

DOCKET NO. 50-443

1.0 INTRODUCTION

By letter dated March 5, 1998, the North Atlantic Energy Service Corporation (the licensee) submitted a request for changes to the Seabrook Station Technical Specifications (TSs). The proposed amendment would revise the TSs by relocating the procedural details of the Radiological Effluent Technical Specifications (RETS) to the Offsite Dose Calculation Manual (ODCM). The TSs would also be revised to relocate procedural details associated with solid radioactive wastes to the Process Control Program (PCP). In addition, the Administrative Controls section of the TSs would be revised to incorporate programmatic controls for radioactive effluents and environmental monitoring. Guidance on these proposed changes was provided to all power reactor licensees and applicants by Generic Letter (GL) 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program."

2.0 BACKGROUND

Section 182a of the Atomic Energy Act of 1954, as amended (the Act), requires TSs to be made part of any license issued to operate production or utilization facilities. Section 50.36 of Title 10 of the Code of Federal Regulations (10 CFR), "Technical Specifications," implements Section 182a of the Act and delineates requirements for determining the contents of TSs. Section 50.36 requires that the TSs include items in specific categories, including (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation (LCOs); (3) surveillance requirements; (4) design features; and (5) administrative controls. However, § 50.36 does not specify the particular requirements to be included in a plant's TSs.

The following four criteria are defined by 10 CFR 50.36 to determine whether particular items are required to be included in the TSs:

- (1) installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary;

- (2) a process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier;
- (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of, or presents a challenge to, the integrity of a fission product barrier;
- (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

As discussed in GL 89-01, the NRC staff examined the contents of the RETS in relation to the then existing Commission's "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788). The staff determined that programmatic controls could be implemented in the Administrative Controls section of the TSs to satisfy regulatory requirements for the RETS. Additionally, the staff determined that the procedural details of the current TSs on radioactive effluents and radiological environmental monitoring could be relocated to the ODCM. Likewise, the procedural details of the current TSs on solid radioactive wastes could be relocated to the PCP. These actions simplify the RETS, meet regulatory requirements for radioactive effluents and radiological environmental monitoring, and are provided as a line-item improvement, consistent with the goals of the Policy Statement.

As discussed in the licensee's submittal dated March 5, 1998, the proposed changes were prepared consistent with the guidance contained in GL 89-01. The proposed items to be relocated are candidates for no longer meriting inclusion in the TSs since they don't meet the four objective criteria specified in 10 CFR 50.36. Future changes to the relocated RETS, in either the ODCM or PCP, would be governed by the programmatic and administrative controls specified in the Administrative Controls section of the TSs.

### 3.0 EVALUATION

As discussed in Enclosure 1 to GL 89-01, the following items are to be included in a license amendment request to implement the RETS changes:

- (1) The model specifications in Enclosure 3 to GL 89-01 should be incorporated into the TSs to satisfy the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50. The TS definitions of the ODCM and PCP should be updated to reflect these changes.
- (2) The procedural details covered in the licensee's current RETS, consisting of LCOs, their applicability, remedial actions, surveillance requirements, and the Bases section of the TSs for these requirements, are to be relocated to the ODCM or PCP as appropriate and in a manner that ensures that these details are incorporated in plant operating procedures.

- (3) The licensee should confirm in the amendment request that changes for relocating the procedural details of the current RETS to either the ODCM or PCP have been prepared in accordance with the proposed changes to the Administrative Controls sections of the TSs so that they may be implemented immediately upon issuance of the proposed amendment. A complete and legible copy of the revised ODCM should be forwarded with the amendment request for NRC's use as a reference.

The staff has reviewed the licensee's amendment request to ensure that the three items discussed above were properly addressed. The staff's evaluation for each of these items is included in sections 3.1, 3.2, and 3.3 of this safety evaluation, respectively. Other proposed TS changes not directly related to these three items are evaluated in section 3.4. In addition, in order to address issues discussed in the licensee's submittal related to compliance with 10 CFR Part 20, a review of the applicable 10 CFR Part 20 requirements is provided in section 3.5.

### 3.1 Incorporation of Programmatic Controls in the Administrative Controls Section of the TSs

Enclosure 3 to GL 89-01 provides model TS revisions to supplement or replace existing specifications. These model TSs provide programmatic controls for RETS and its associated reporting requirements. Also included in Enclosure 3 are model definitions for the ODCM and PCP to reflect the programmatic controls and reporting requirements changes.

The licensee has proposed to revise the following Seabrook TSs to implement the guidance provided in Enclosure 3 to GL 89-01:

<u>SPECIFICATION</u>	<u>TITLE</u>
1.20	DEFINITIONS: OFFSITE DOSE CALCULATION MANUAL
1.25	DEFINITIONS: PROCESS CONTROL PROGRAM
6.7.6.g	PROCEDURES AND PROGRAMS: RADIOACTIVE EFFLUENT CONTROLS PROGRAM
6.7.6.h	PROCEDURES AND PROGRAMS: RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM
6.8.1.3	REPORTING REQUIREMENTS: ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT
6.8.1.4	REPORTING REQUIREMENTS: ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT
6.9.3	RECORD RETENTION
6.12	PROCESS CONTROL PROGRAM (PCP)
6.13	OFFSITE DOSE CALCULATION MANUAL (ODCM)

The proposed revisions to the above referenced TSs are consistent with the guidance provided in GL 89-01 except for the following items:

- (1) Enclosure 3 to GL 89-01 indicates that the Radioactive Effluent Release Report is submitted on a semi-annual basis. The licensee's proposed changes to TSs 1.20, 6.8.1.4, and 6.13 indicate that this report is submitted annually. The change in submittal frequency from semi-annually to annually was previously approved for Seabrook in a safety evaluation dated August 16, 1993, for Amendment No. 22. That change was approved consistent with a revision to 10 CFR 50.36a which became effective on October 1, 1992. Therefore, the staff finds that this deviation from the guidance in GL 89-01 is acceptable.
- (2) The model TSs in Enclosure 3 to GL 89-01 related to the Radioactive Effluent Controls Program states that the program shall include the following as one of the program elements:

Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2,

The licensee has proposed to add the word "instantaneous" prior to the word "concentrations" for this item (reference proposed new TS 6.7.6.g.2). This deviation from the guidance in GL 89-01 is acceptable based on the evaluation in section 3.5 of this safety evaluation.

- (3) The model TSs in Enclosure 3 to GL 89-01 related to the Radioactive Effluent Controls Program states that the program shall include the following as one of the program elements:

Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR Part 20, Appendix B, Table II, Column 1,

The licensee has proposed the following wording for this item (reference proposed new TS 6.7.6.g.7):

Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY shall be limited to the following:

- a) For noble gases: Less than or equal to 500 mrem/yr to the whole body and less than or equal to 3000 mrem/yr to the skin, and
- b) For Iodine-131, for Iodine-133, for tritium, and for all radionuclides in particulate form with half-lives greater than 8 days; less than or equal to 1500 mrem/yr to any organ,

The licensee's proposed wording for TS 6.7.6.g.7 is consistent with the wording in existing TS 3.11.2.1 (which will be relocated to the ODCM). The existing Bases for TS 3.11.2.1 (which will also be relocated to the ODCM) states that the annual dose limits are the doses associated with the concentrations of 10 CFR Part 20, Appendix B, Table II, Column 1. Therefore, the staff finds that this deviation from the guidance in GL 89-01 is acceptable since it meets the intent of the GL and is consistent with the existing TSs.

- (4) The model TSs in Enclosure 3 to GL 89-01 related to the changes to the ODCM state in part that:

Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

The licensee has proposed the following wording for the associated sentence (reference proposed changes to TS 6.13):

Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and each affected page shall indicate the revision number the change was implemented.

The staff finds that this deviation from the guidance in GL 89-01 is acceptable since the proposed change to TS 6.13 provides adequate change control of the ODCM.

### 3.2 Incorporation of Procedural Details of Current RETS into the ODCM or PCP

Enclosure 2 to GL 89-01 provides a listing of existing TSs included under the heading of RETS in the Standard Technical Specifications and includes a description of how each specification should be dispositioned (e.g., relocate procedural details of current RETS to the ODCM or PCP, retain existing requirement in the TSs).

The licensee has proposed to delete the following Seabrook TSs including the associated LCO's, their applicability, action statements, surveillance requirements, and Bases. The procedural details contained in these TSs would be relocated to the ODCM or PCP as appropriate, in accordance with the guidance in Enclosure 2 to GL 89-01:

<u>SPECIFICATION</u>	<u>TITLE</u>
1.35	SOLIDIFICATION
3/4.3.3.9	RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION
3/4.3.3.10	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

3/4.11.1.1	LIQUID EFFLUENTS: CONCENTRATION
3/4.11.1.2	LIQUID EFFLUENTS: DOSE
3/4.11.1.3	LIQUID EFFLUENTS: LIQUID RADWASTE TREATMENT SYSTEM
3/4.11.2.1	GASEOUS EFFLUENTS: DOSE RATE
3/4.11.2.2	GASEOUS EFFLUENTS: DOSE - NOBLE GASES
3/4.11.2.3	GASEOUS EFFLUENTS: DOSE - IODINE-131, IODINE-133, TRITIUM, AND RADIOACTIVE MATERIAL IN PARTICULATE FORM
3/4.11.2.4	GASEOUS EFFLUENTS: GASEOUS RADWASTE TREATMENT SYSTEM
3/4.11.3	SOLID RADIOACTIVE WASTES
3/4.11.4	RADIOACTIVE EFFLUENTS: TOTAL DOSE
3/4/12.1	RADIOLOGICAL ENVIRONMENTAL MONITORING: MONITORING PROGRAM
3/4/12.2	RADIOLOGICAL ENVIRONMENTAL MONITORING: LAND USE CENSUS
3/4/12.3	RADIOLOGICAL ENVIRONMENTAL MONITORING: INTERLABORATORY COMPARISON PROGRAM

The proposed deletion and relocation of the above referenced TSs is consistent with the guidance provided in GL 89-01 except for the following item:

- (1) The licensee's application states that TS 6.14, "Major Changes to Liquid, Gaseous, and Solid Radwaste Treatment Systems," is to be retained in the Seabrook TSs. Enclosure 2 to GL 89-01 states that this TS should be relocated to the ODCM or PCP as appropriate. The staff finds that this deviation from the guidance in the GL is acceptable since this section merely describes reporting requirements and is not otherwise inconsistent with the intent of the GL.

Note, Enclosure 2 to GL 89-01 states that TS 3/4.11.2.8, "Purging and Venting," should also be deleted from the TSs and relocated to the ODCM. However, this TS is not applicable to the current Seabrook TSs.

Enclosure 2 to GL 89-01 also lists two TSs which should be revised in accordance with Enclosure 3, while the existing procedural details are relocated to the ODCM or PCP as appropriate. The licensee has proposed to revise the following TSs (as evaluated in the preceding section 3.1) and to relocate the existing procedural details to the ODCM:

<u>SPECIFICATION</u>	<u>TITLE</u>
6.8.1.3	REPORTING REQUIREMENTS: ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT
6.8.1.4	REPORTING REQUIREMENTS: ANNUAL RADIOLOGICAL EFFLUENT RELEASE REPORT

The proposed relocation of the existing procedural details to the ODCM for these two TSs is consistent with the guidance provided in GL 89-01.

The procedural details that have been relocated are not required by the Commission's regulations to be included in the TSs (i.e., they don't satisfy the four criteria discussed in the Background section). Future changes to these procedural details, in either the ODCM or PCP, will be governed by the programmatic controls included in the Administrative Controls section of the TSs.

The licensee's submittal dated March 5, 1998, states that one other change being made to the ODCM is the deletion of the requirement for prior NRC review and approval of all proposed changes to the ODCM, Part A. Part A consists of the Radiological Effluent Control and Environmental Monitoring Programs and will include the relocated RETS procedural details. As discussed in GL 89-01, the NRC staff does not intend to repeat technical reviews of the relocated procedural details because their consistency with the applicable regulatory requirements is a matter of record from past NRC reviews of RETS. Consistent with the intent of the GL, the licensee may make future changes to the ODCM, Part A without prior NRC approval in accordance with 10 CFR 50.59.

The licensee has proposed to retain the following Seabrook TSs, in accordance with the guidance in Enclosure 2 to GL 89-01:

<u>SPECIFICATION</u>	<u>TITLE</u>
3/4.11.1.4	LIQUID HOLDUP TANKS
3/4.11.2.5	EXPLOSIVE GAS MIXTURE SYSTEM
5.1.3	DESIGN FEATURES: SITE - MAPS DEFINING UNRESTRICTED AREAS AND SITE BOUNDARY FOR RADIOACTIVE GASEOUS AND LIQUID EFFLUENTS

Note, Enclosure 2 to GL 89-01 states that the TS section 3/4.11.2 requirements for "Gas Storage Tanks" and "Main Condenser (BWR)" should also be retained. However, these two TSs are not applicable to the current Seabrook TSs. Therefore, the proposed retention of the above referenced TSs is consistent with the guidance provided in GL 89-01.

Enclosure 2 to GL 89-01 also states that the existing requirements for explosive gas monitoring instrumentation, which are associated with the TSs for "Radioactive Gaseous Effluent

Monitoring Instrumentation," should be retained and revised in accordance with the model TSs provided in Enclosure 4 to the GL. The licensee has proposed to revise the following Seabrook TSs to implement the guidance provided in Enclosure 4 to GL 89-01:

<u>SPECIFICATION</u>	<u>TITLE</u>
3/4.3.3.10	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION
Table 3.3-13	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION
Table 4.3-6	RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

The proposed revision of the above referenced TSs is consistent with the guidance provided in GL 89-01.

### 3.3 Licensee Confirmation that Guidance in GL 89-01 has been followed

The licensee confirmed in their submittal dated March 5, 1998, that the changes for relocating the procedural details of the current RETS to either the ODCM or PCP were prepared in accordance with the proposed changes to the Administrative Controls section of the TSs as specified in GL 89-01. The changes to the ODCM and PCP will be implemented when this amendment is implemented.

### 3.4 Other Proposed TS Changes

In addition to the proposed TS changes which are discussed above, the licensee has proposed to revise the following TSs:

<u>SPECIFICATION</u>	<u>TITLE</u>
1.42	DEFINITIONS: VENTILATION EXHAUST TREATMENT SYSTEM
Table 3.3-6	RADIATION MONITORING INSTRUMENTATION FOR PLANT OPERATIONS

The licensee has proposed to relocate TS 1.42 to the ODCM since this term is only used in TS 3.11.2.4 which is being relocated to the ODCM. The staff finds that this change is acceptable.

The licensee has proposed to revise TS Table 3.3-6 to change an existing note which references TS 3.11.2.1. Since TS 3.11.2.1 is being relocated to the ODCM, the revised note would reference the appropriate ODCM section. The staff finds that this change is acceptable.

### 3.5 Review of Applicable 10 CFR Part 20 Requirements

GL 89-01 was issued on January 31, 1989, and referenced the requirements of 10 CFR 20.106 for control of releases of radioactive effluents. This is consistent with the current Bases for Seabrook TS 3/4.11.1, "Liquid Effluents" and TS 3/4.11.2, "Gaseous Effluents," which also reference 10 CFR 20.106.

Subsequent to the issuance of the GL, 10 CFR Part 20, "Standards for Protection Against Radiation," was revised. The revised Part 20 became effective for all NRC licensees on January 1, 1994. The "old" Part 20 (i.e., prior to the revision) consisted of Sections 20.1 through 20.601 while the revised Part 20 consists of Sections 20.1001 through 20.2402. Section 20.1008, "Implementation," of the revised Part 20 states that any existing license condition or TS that is more restrictive than a requirement in the revised Part 20 remains in force until there is a TS change, license amendment, or license renewal.

In a letter dated April 28, 1993, the Nuclear Management and Resources Council (NUMARC), requested the NRC to review NUMARC's characterization of the general intent and applicability of the implementation of the revised Part 20 with regard to Part 50 licensee's RETS. Specifically, the NUMARC letter provided their position which included the following general principles:

- (1) The general intent of the revised Part 20 implementation requirements with regard to TSs is to assure that applicable requirements in the revised Part 20 are met and, where more restrictive, that the existing TSs remain in force.
- (2) The general intent of the revised Part 20 is that radiation doses to members of the public not exceed 100 mrems per year, which is more restrictive than the 500 mrems per year limit in the "old" Part 20, and that fuel cycle licensees also comply with 40 CFR 190. The revised Part 20 does not include a requirement on limiting radioactive concentrations in effluents, which is less restrictive than the "old" Part 20.
- (3) The general intent of the RETS issued in Part 50 licenses is to assure that annual radiation doses to any member of the public due to effluents will not exceed 25 mrems to the whole body, 75 mrems to the thyroid, and 25 mrems to any other organ, as required by 40 CFR 190; and that radiological effluents when averaged over 1 hour, will not exceed the maximum permissible concentrations in the "old" Part 20, Appendix B, Table II, for liquid effluents and the dose rate associated with that table for gaseous effluents.
- (4) The Part 50 licensee RETS, as referenced to the "old" Part 20, are generally more restrictive than the comparable requirements in the revised Part 20.

The NUMARC letter concluded that RETS that reference the "old" Part 20 are generally more restrictive than the comparable requirements of the revised Part 20, and therefore in accordance with 10 CFR 20.1008, the existing RETS could remain in force after the licensee implements the revised Part 20 or until there is a change to the applicable TSs through a license amendment. The letter stated that the existing RETS that reference the "old" Part 20

would maintain the level of required protection of public health and safety and would be consistent with the requirements of the revised Part 20.

The licensee's submittal dated March 5, 1998, states that Seabrook intends to continue to operate within the requirements of the "old" 10 CFR Part 20 and its Appendices for release of radioactive effluents. The submittal states that the method currently in use for controlling releases to within the "old" 10 CFR 20.106, Appendix B maximum permissible concentration limits based on "instantaneous" concentration values is still suitable for demonstrating conformance to the requirements of the revised 10 CFR Part 20, Appendix B effluent concentration limits.

The submittal references a letter dated June 30, 1993, from Thomas E. Murley, then Director of the Office of Nuclear Reactor Regulation, to Thomas E. Tipton of NUMARC, which provided the NRC's response to the NUMARC letter dated April 28, 1993. The NRC's response states in part that:

After careful review of your position and other relevant factors, we have determined that it is acceptable to the staff for licensees to retain their existing level of effluent control as implementing the ALARA requirement after January 1, 1994, without submitting individual requests for amending their technical specifications to comply with new 10 CFR 20.1101(b). Therefore, the instantaneous release rate limits, which are specified by reference to the values in Appendix B, will continue to be the values in Appendix B prior to the revision, until the technical specifications are changed.

Based on the above, the staff finds it acceptable for the existing Seabrook RETS, which reference the requirements of 10 CFR 20.106 for control of releases of radioactive effluents, to be relocated to the ODCM without revision to the revised Part 20 requirements.

### 3.6 Summary

Based on the above evaluation, the staff finds that the proposed TS amendment is consistent, except as discussed above, with the guidance provided in GL 89-01. All deviations from the guidance in GL 89-01 were found to be acceptable. Since the control of radioactive effluents and radiological environmental monitoring continue to be limited in accordance with operating procedures that must satisfy the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50, the staff concludes that these changes are administrative in nature and that there is no adverse impact on plant safety as a consequence. Accordingly, the NRC staff finds that the proposed changes are acceptable.

### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New Hampshire and Massachusetts State officials were notified of the proposed issuance of the amendment. The State officials had no comments.

## 5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration (63 FR 19972). Public comments from the Seacoast Anti-Pollution League were received. The staff's response to the comments is contained in section 7.0 of this safety evaluation. The comments do not affect the staff's proposed no significant hazards consideration determination. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

## 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

## 7.0 COMMENTS FROM THE SEACOAST ANTI-POLLUTION LEAGUE

Pursuant to the notice of opportunity to submit written comments concerning the application for approval published in the Federal Register on April 22, 1998 (63 FR 19972), the Seacoast Anti-Pollution League (SAPL) filed comments. In their letter dated May 22, 1998, SAPL specifically opposed the licensee's request to relocate Seabrook's Radiological Effluent Technical Specifications (RETS) to the Offsite Dose Calculation Manual (ODCM). SAPL stated that the relocation of the RETS to the ODCM "...constitutes an "end-run" around 10CFR50.91, and the ability that regulation gives the public to intervene in decisions concerning the release of radioactive effluents, both solid and liquid, from the Seabrook Station plant." In this letter, SAPL also commented on other proposed amendments and concluded that "...we feel these requested license changes create new risks for the public and should be rejected as simply not feasible at a plant that is, per its management's own admission, experiencing some internal control problems."

In response to SAPL's comments on this specific amendment request, the licensee's proposed changes were submitted in accordance with Generic Letter (GL) 89-01, "Implementation of Programmatic Controls for Radiological Effluent Technical Specifications in the Administrative Controls Section of the Technical Specifications and the Relocation of Procedural Details of RETS to the Offsite Dose Calculation Manual or to the Process Control Program." This GL states that "The staff has determined that programmatic controls can be implemented in the Administrative Controls section for the Technical Specifications (TS) to satisfy existing regulatory requirements of RETS. At the same time, the procedural details of the current TS on

radioactive effluents and radiological environmental monitoring can be relocated to the Offsite Dose Calculation Manual (ODCM). Likewise, the procedural details of the current TS on solid radioactive wastes can be relocated to the process Control Program (PCP). These actions simplify the RETS, meet the regulatory requirements for radioactive effluents and radiological environmental monitoring, and are provided as a line-item improvement of the TS, consistent with the goals of the [Commission's "Interim] Policy Statement [on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788)]."

In other words, programmatic information was added to Seabrook's TSs in order to maintain regulatory control over the RETS, and the procedural details, which were no longer required to be in the TSs per 10 CFR Part 36, were removed. The regulatory requirements of RETS were maintained along with the public's opportunity to intervene pursuant to 10 CFR 50.91.

It should also be realized that the standards for protection against the release of radioactive effluents are established by 10 CFR Part 20, "Standards for Protection Against Radiation" which includes Subpart D, "Radiation Dose Limits for Individual Members of the Public." The standards and limits established by 10 CFR Part 20 are not affected by the proposed changes to the Technical Specifications or to the ODCM.

Therefore, based on these considerations, the staff finds that SAPL's concerns regarding reduced intervention opportunity and the potential for new risks to the public, as stated earlier, are not valid.

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