FOR INCLUSION ON TECHNICAL SPECIFICATION WEB PAGE

THE FOLLOWING EXAMPLE OF AN APPLICATION WAS PREPARED BY THE NRC STAFF TO FACILITATE THE USE OF THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS (CLIIP). THE MODEL PROVIDES THE EXPECTED LEVEL OF DETAIL AND CONTENT FOR AN APPLICATION TO ELIMINATE PASS REQUIREMENTS USING CLIIP. LICENSEES REMAIN RESPONSIBLE FOR ENSURING THAT THEIR ACTUAL APPLICATION FULFILLS THEIR ADMINISTRATIVE REQUIREMENTS AS WELL AS NRC REGULATIONS.

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, D. C. 20555

SUBJECT: PLANT NAME
DOCKET NO. 50-
APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT TO ELIMINATE REQUIREMENTS FOR POST ACCIDENT SYSTEMS USING THE CONSOLIDATED LINE ITEM IMPROVEMENT PROCESS

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, [LICENSEE] is submitting a request for an amendment to the technical specifications (TS) for [PLANT NAME, UNIT NOS.].

The proposed amendment would delete Technical Specification (TS) 5.5.3, "Post Accident Sampling System (PASS)," and thereby eliminate the requirements to have and maintain the PASS at [PLANT]. The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366, "Elimination of Requirements for a Post Accident Sampling System (PASS)." The availability of this technical specification improvement was announced in the *Federal Register* on [DATE OF NOTICE OF AVAILABILITY] as part of the consolidated line item improvement process (CLIIP). [*AMENDMENT MAY ALSO INCLUDE: As discussed in the notice of availability for this TS improvement, this request also revises TS 5.5.2, "Primary Coolant Sources Outside Containment," to reflect the elimination of PASS*.]

Attachment 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Attachment 2 provides the existing TS pages marked-up to show the proposed change. Attachment 3 provides revised clean technical specification pages. Attachment 4 provides a summary of the regulatory commitments made in this submittal. *[IF APPLICABLE: Attachment 5 provides the existing TS Bases pages marked-up to show the proposed change (for information only).]*

[LICENSEE] requests approval of the proposed License Amendment by [DATE], with the amendment being implemented [BY DATE OR WITHIN X DAYS].

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated [STATE] Official.

I declare under penalty of perjury under the laws of the United States of America that I am authorized by [LICENSEE] to make this request and that the foregoing is true and correct. [Note that request may be notarized in lieu of using this oath or affirmation statement].

If you should have any questions regarding this submittal, please contact [ ].

Sincerely,

Name, Title

Attachments: 1. Description and Assessment
2. Proposed Technical Specification Changes
3. Revised Technical Specification Pages
4. Regulatory Commitments
5. Proposed Technical Specification Bases Changes (if applicable)

cc: NRR Project Manager
Regional Office
Resident Inspector
State Contact

ATTACHMENT 1
Description and Assessment

1.0 DESCRIPTION

The proposed License amendment deletes the program requirements of TS (5.5.3), "Post Accident Sampling System (PASS)." [*The proposed license amendment also revises TS 5.5.2, "Primary Coolant Sources Outside Containment," to reflect the elimination of the PASS.*]

The changes are consistent with NRC approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-366. The availability of this technical specification improvement was announced in the *Federal Register* on [DATE] as part of the consolidated line item improvement process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of Published Safety Evaluation

[LICENSEE] has reviewed the safety evaluation published on [DATE] as part of the CLIIP. This verification included a review of the NRC staff's evaluation as well as the supporting information provided to support TSTF-366 (i.e., WCAP-14986-A, Rev.2, "Post Accident Sampling System Requirements: A Technical Basis," submitted October 26, 1998, as supplemented by letters dated April 28, 1999, April 10 and May 22, 2000 OR CE NPSD-1157, Revision 1, "Technical Justification for the Elimination of the Post-Accident Sampling System From the Plant Design and Licensing Bases for CEOG Utilities," dated May 5, 1999, as supplemented by letter dated April 14, 2000.) [LICENSEE] has concluded that the justifications presented in the TSTF proposal and the safety evaluation prepared by the NRC staff are applicable to [PLANT, UNIT NOS.] and justify this amendment for the incorporation of the changes to the [PLANT] Technical Specifications.

2.2 Optional Changes and Variations

[LICENSEE] is not proposing any variations or deviations from the technical specification changes described in TSTF-366 or the NRC staff's model safety evaluation published on [DATE].

(1) Requirements for installing and maintaining PASS were included in a confirmatory order for [PLANT] issued on [DATE]. This amendment request includes superseding the requirements imposed by that confirmatory order.

(2) As described in the model safety evaluation published on [DATE], the elimination of the TS and other regulatory requirements for PASS result in additional changes to the TS. These changes are [DESCRIBE ADDITIONAL CHANGES]. The changes are necessary due to the removal of the TS section on PASS. The changes do not revise technical requirements beyond that addressed by the NRC staff in the model safety evaluation published on [DATE]. [Note that these changes could involve the deletion or modification of license conditions in addition to other TS.]

(3) The [PLANT] TS include an administrative requirement for a program to minimize the leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident. PASS is specifically listed in TS [5.5.2] as falling under the scope of this requirement. As described in the staff's model safety evaluation published on [DATE], [LICENSEE] is proposing to [DISCUSS OPTION FROM MODEL SE].

(4) The elimination of PASS results in changes to the discussion in the Bases section for TS [3.3.3, "Post Accident Monitoring Instrumentation"]. The current Bases mention the capabilities of PASS as part of the justification for allowing both hydrogen monitor channels to be out of service for a period of up to 72 hours. Possible wording for the revised Bases discussion for TS [3.3.3] is provided in Attachment 3. [LICENSEE] will formally address the change to the Bases in accordance with [the Bases Control Program or administrative procedure for revising Bases] and will provide the actual revised Bases pages in a future submittal.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Determination

[LICENSEE] has reviewed the proposed no significant hazards consideration determination published ON [DATE] as part of the CLIIP. [LICENSEE] has concluded that the proposed determination presented in the notice is applicable to [PLANT] and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in *Federal Register* on [DATE] for this technical specification improvement, plant-specific verifications were performed as follows:

1. [LICENSEE] has developed contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in *emergency plan implementing procedures* and implemented with the implementation of the License amendment. Establishment of contingency plans is considered a regulatory commitment.

2. The capability for classifying fuel damage events at the Alert level threshold has been established for [PLANT] at radioactivity levels of 300 mCi/cc dose equivalent iodine. This capability will be described in *emergency plan implementing procedures* and implemented with the implementation of the License amendment. The capability for classifying fuel damage events is considered a regulatory commitment.

3. [LICENSEE] has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described in our *emergency plan implementing procedures*. The capability to monitor radioactive iodines is considered a regulatory commitment.

4.0 ENVIRONMENTAL EVALUATION

[LICENSEE] has reviewed the environmental evaluation included in the model safety evaluation published on [DATE] as part of the CLIIP. [LICENSEE] has concluded that the staff's findings presented in that evaluation are applicable to [PLANT] and the evaluation is hereby incorporated by reference for this application.

ATTACHMENT 2

PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP)

ATTACHMENT 3

PROPOSED TECHNICAL SPECIFICATION PAGES

ATTACHMENT 4

LIST OF REGULATORY COMMITMENTS

The following table identifies those actions committed to by [LICENSE] in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments. Please direct questions regarding these commitments to [ ].

REGULATORY COMMITMENTS	Due Date/Event
[LICENSEE] has developed contingency plans for obtaining and analyzing highly radioactive samples of reactor coolant, containment sump, and containment atmosphere. The contingency plans will be contained in [emergency plan implementing procedures] and [implemented with the implementation of the License amendment]. Establishment of contingency plans is considered a regulatory commitment.	[Complete, implemented with amendment OR within X days of implementation of amendment]

REGULATORY COMMITMENTS	Due Date/Event
The capability for classifying fuel damage events at the Alert level threshold has been established for [PLANT] at radioactivity levels of 300 mCi/cc dose equivalent iodine. This capability will be described in emergency plan implementing procedures and implemented with the implementation of the License amendment. The capability for classifying fuel damage events is considered a regulatory commitment.	[Complete, implemented with amendment OR within X days of implementation of amendment]
[LICENSE] has established the capability to monitor radioactive iodines that have been released to offsite environs. This capability is described in our emergency plan implementing procedures. The capability to monitor radioactive iodines is considered a regulatory commitment.	[Complete, implemented with amendment OR within X days of implementation of amendment]

ATTACHMENT 5

POSSIBLE CHANGES TO TS BASES PAGES

Distribution:

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OFC	NRR/DLPM/PM	NRR/DLPM/LA	NRR/DLPM	OGC	NRR/RTSB
NAME	W Reckley	T Clark	S Black	CMarco	W Beckner
DATE	9 /15/00	9 /29 /00	10/ 04/00	10/24/00	9/19/00 10/ 25/00

OFFICIAL AGENCY RECORD