

January 14, 2000

U.S. Nuclear Regulatory Commission  
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Gentlemen:

ULNRC-04172  
TAC NO. M98803



**DOCKET NUMBER 50-483  
CALLAWAY PLANT  
UNION ELECTRIC COMPANY  
PROPOSED REVISION TO TECHNICAL SPECIFICATIONS  
TO CORRECT EDITORIAL ERRORS**

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- Reference: (1) ULNRC-4044, dated May 27, 1999  
(2) ULNRC-4043, dated May 28, 1999  
(3) NRC Letter from J. N. Donohew to  
G. L. Randolph dated May 28, 1999

This letter transmits an application for amendment to Facility Operating License No. NPF-30 for Callaway Plant. This request proposes to revise various Improved Technical Specifications to correct editorial errors made in the conversion application or in the complete certified copy (References 1 and 2). Reference 3 provided Amendment No. 133 and the associated Safety Evaluation for the conversion of the Callaway Plant Current Technical Specifications to the Improved Technical Specifications.

The Enclosure provides a description of the proposed license changes; a no significant hazards evaluation; and an environmental evaluation. Attachment 1 provides copies of the marked-up Improved Technical Specification pages. Attachment 2 provides clean copies of the proposed Improved Technical Specification pages.

The proposed changes have been evaluated using criteria in 10CFR50.92(c), and it has been determined that the changes involve no significant hazards considerations. The bases for these determinations are described in the Enclosure.

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An evaluation of the proposed changes based on 10CFR51.22(b) and 10CFR51.22(c)(9) has also been performed and it has been determined that the proposed changes do not significantly increase the types and amounts of effluents that may be released offsite nor significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, AmerenUE concludes that the proposed changes meet the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement.

AmerenUE requests approval of the proposed Technical Specifications by March 20, 2000 to support planned implementation of the improved Technical Specification on April 1, 2000. The proposed changes to the Callaway Plant Technical Specifications will be implemented with the implementation of License Amendment No. 133.

If you should have any questions on the above or attached, please contact Dave Shafer at (314) 554-3104 or Dwyla Walker at (314) 554-2126.

Very truly yours,

  
for Alan C. Passwater  
Manager, Corporate Nuclear Services

DJW/jdg

Enclosures: 1) Affidavit  
2) Description of Proposed License Change; Significant Hazards Evaluation; and Environmental Evaluation

Attachments: 1) Marked-up Improved Technical Specifications  
2) Proposed Improved Technical Specifications – Clean Copy



cc: M. H. Fletcher  
Professional Nuclear Consulting, Inc.  
19041 Raines Drive  
Derwood, MD 20855-2432

Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive  
Suite 400  
Arlington, TX 76011-8064

Senior Resident Inspector  
Callaway Resident Office  
U.S. Nuclear Regulatory Commission  
8201 NRC Road  
Steedman, MO 65077

Mr. Jack Donohew (2)  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
1 White Flint, North, Mail Stop OWEN 4D3  
11555 Rockville Pike  
Rockville, MD 20852-2738

Manager, Electric Department  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Ron Kucera  
Department of Natural Resources  
P.O. Box 176  
Jefferson City, MO 65102

Denny Buschbaum  
TU Electric  
P.O. Box 1002  
Glen Rose, TX 76043

Pat Nugent  
Pacific Gas & Electric  
Regulatory Services  
P.O. Box 56  
Avila Beach, CA 93424

**ENCLOSURE****DESCRIPTION OF PROPOSED CHANGES; SIGNIFICANT HAZARDS  
EVALUATION; AND ENVIRONMENTAL EVALUATION**

This license amendment request proposes to revise various Improved Technical Specifications to correct editorial errors made in the conversion application or in the complete certified copy of Improved Technical Specifications transmitted by letters ULNRC-4043 dated May 28, 1999 and ULNRC-4044 dated May 27, 1999. A specific list of the proposed changes is provided in this Enclosure. License Amendment No. 133 and the associated Safety Evaluation was issued on May 28, 1999 for the conversion of the Callaway Plant Current Technical Specifications to the Improved Technical Specifications.

**PROPOSED IMPROVED TECHNICAL SPECIFICATIONS  
MARKED-UP COPIES**

See Attachment 1

**PROPOSED IMPROVED TECHNICAL SPECIFICATIONS  
CLEAN COPIES**

See Attachment 2

**DESCRIPTION OF PROPOSED CHANGES**

License Amendment No. 133 and the associated Safety Evaluation was issued on May 28, 1999 for the conversion of the Callaway Plant Current Technical Specifications (CTS) to the Improved Technical Specifications (ITS). During activities associated with the implementation of License Amendment No. 133, a number of editorial corrections were identified. The following list contains changes from what was provided in the conversion application and associated supplements:

1. **Table of Contents, page 2. Section 3.3.7** - The abbreviation "(CREFS)" should be "(CREVS)". The Table of Contents was not originally provided in the ITS submittal in ULNRC-3578 dated May 15, 1997. The Table of Contents was provided in the certified copy of ITS transmitted in ULNRC-4044 dated May 27, 1999. The abbreviation provided in the Table of Contents was "(CREFS)", when the correct abbreviation should be "(CREVS)".
2. **Page 3.7-5. ACTIONS, CONDITION D** states: "Required Action and associated Completion Time of Condition C or D not met". The reference to Condition D should be deleted as not appropriate, because the reference

occurs within Condition D. In response to NRC Request for Additional Information (RAI) Q 3.7.2-1 (ULNRC-03905 dated 10/21/98), changes associated with Traveler TSTF-281 were withdrawn. Condition D of the traveler was withdrawn and the words "or D" in the remaining Condition D of the specification should have been deleted. As currently issued by License Amendment No. 133, 3.7.2 ACTION, CONDITION D, should state: "Required Action and Associated Completion Time of Condition C not met".

During activities associated with the implementation of License Amendment No. 133, additional editorial corrections were identified that were attributed to errors associated with the submittal of the certified copy of the ITS. The below list contains corrections based on errors in the certified copy of the ITS transmitted by the letters identified in References 1 and 2.

1. **Page 1.1-1.** Under 1.1 Definitions, the Term, ACTIONS, the word "equired" should be corrected to "Required". This word is misspelled in the certified copy due to a typographical error.
2. **Page 1.3-10.** Under 1.3 Completion Times, EXAMPLES, the COMPLETION TIME for EXAMPLE 1.3-6, the placement of "8 hours" should be raised to the same line as REQUIRED ACTION A.2. The placement provided in the certified copy was incorrect due to typographical error.
3. **Page 3.7-10.** Under 3.7.4 REQUIRED ACTION for CONDITION D, the NOTE should be a full column width note. The NOTE, as provided in the certified copy, is incorrect due to typographical error.
4. **Page 3.7-31.** Under LCO 3.7.13, the NOTE has an incorrect capitalization of the word "boundary". The incorrect capitalization provided in the certified copy was due to typographical error.
5. **Pages 3.7-36.** Under 3.7.6 ACTION, CONDITION A, the NOTE provided should be a full column width note. The placement provided in the certified copy is incorrect due to typographical error.
6. **Page 5.0-29.** Under 5.6 Reporting Requirements, 5.6.5 CORE OPERATING LIMITS REPORT (COLR), item a.7, section "3.1:5" should be corrected to "3.1.5". The correction is required due to typographical error in the certified copy.

In summary, the proposed changes involve corrections to the ITS that are associated with the original conversion application and supplements or the certified copy of ITS. As such, the changes are considered as administrative changes and do not modify, add, delete, or relocate any technical requirements of the Improved Technical Specifications.

**SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION**

In accordance with 10CFR50.92, AmerenUE has reviewed the proposed changes and has concluded that they do not involve a Significant Hazards Consideration (SHC). The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised. The proposed changes do not involve a SHC because they would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes involve corrections to the ITS that are associated with the original conversion application and supplements or the certified copy of ITS. The changes are considered as administrative changes and do not modify, add, delete, or relocate any technical requirements of the Technical Specifications. As such, the administrative changes do not effect initiators of analyzed events or assumed mitigation of accident or transient events.

Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any previously evaluated.

The proposed changes do not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The proposed changes will not impose any new or eliminate any old requirements.

Thus, the changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in the margin of safety.

The proposed changes will not reduce a margin of safety because they have no effect on any safety analyses assumptions. The changes are administrative in nature.

Therefore, the changes do not involve a significant reduction in the margin of safety.

Based on the above discussions, it has been determined that the requested technical specification revisions do not involve a significant increase in the probability of consequences of an accident or other adverse conditions over previous evaluations; or create the possibility of a new or different kind of accident or condition over previous evaluations; or involve a significant reduction in a margin of safety. Therefore, the requested license amendment does not involve a significant hazards consideration.

## **ENVIRONMENTAL EVALUATION**

AmerenUE has reviewed the proposed license amendment against the criteria of 10CFR51.22 for environmental considerations. The proposed amendment does not involve: (1) A significant hazards consideration, as discussed above; (2) A significant change in the types or significant increase in the amounts of any effluents that may be released offsite; (3) A significant increase in individual or cumulative occupational radiation exposure. None of the proposed changes involves a change to the facility or operating procedures that would cause an increase in the amounts of effluents or create new types of effluents. The proposed changes are administrative in nature and do require any changes to Trip Setpoints. These changes have no relation to occupational radiation exposure, either individual or cumulative.

Based on the foregoing, AmerenUE concludes that the proposed changes meet the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement. Pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

## **CONCLUSION**

As discussed above, the proposed changes to the Improved Technical Specifications do not involve a significant hazard consideration pursuant to 10CFR50.92. Additionally, AmerenUE has determined that this license amendment meets the criteria delineated in 10CFR51.22(c)(9) for a categorical exclusion from the requirements for an environmental impact statement. The proposed changes will not endanger the health and safety of the general public.

**ULNRC- 04172**

**ATTACHMENT 1**

**MARKED-UP PROPOSED IMPROVED TECHNICAL SPECIFICATIONS**

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**T/S 3.7.4, page 3.7-10**

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## 1.0 USE AND APPLICATION

## 1.1 Definitions

## NOTE

The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases.

<u>Term</u>	<u>Definition</u>
ACTIONS	ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times.
ACTUATION LOGIC TEST	An ACTUATION LOGIC TEST shall be the application of various simulated or actual input combinations in conjunction with each possible interlock logic state required for OPERABILITY of a logic circuit and the verification of the required logic output. The ACTUATION LOGIC TEST, as a minimum, shall include a continuity check of output devices.
AXIAL FLUX DIFFERENCE (AFD)	AFD shall be the difference in normalized flux signals between the top and bottom halves of an excore neutron detector.
CHANNEL CALIBRATION	A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an in-place qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps.
CHANNEL CHECK	A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter.

(continued)

1.3 Completion Times

EXAMPLES

EXAMPLE 1.3-5 (continued)

If the Completion Time associated with a valve in Condition A expires, Condition B is entered for that valve. If the Completion Times associated with subsequent valves in Condition A expire, Condition B is entered separately for each valve and separate Completion Times start and are tracked for each valve. If a valve that caused entry into Condition B is restored to OPERABLE status, Condition B is exited for that valve.

Since the Note in this example allows multiple Condition entry and tracking of separate Completion Times, Completion Time extensions do not apply.

EXAMPLE 1.3-6

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One channel inoperable.	A.1 Perform SR 3.x.x.x. <u>OR</u> A.2 Reduce THERMAL POWER to $\leq 50\%$ RTP.	Once per 8 hours  8 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours

(continued)

3.7 PLANT SYSTEMS

3.7.2 Main Steam Isolation Valves (MSIVs)

LCO 3.7.2 Four MSIVs shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One MSIV inoperable in MODE 1.	A.1 Restore MSIV to OPERABLE status.	8 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 2.	6 hours
C. <u>NOTE</u> Separate Condition entry is allowed for each MSIV.  One or more MSIVs inoperable in MODE 2 or 3.	C.1 Close MSIV. <u>AND</u> C.2 Verify MSIV is closed.	8 hours  Once per 7 days
D. Required Action and associated Completion Time of Condition C <u>not met</u>	D.1 Be in MODE 3. <u>AND</u> D.2 Be in MODE 4.	6 hours  12 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. With one or more of the required ASD(s) inoperable because of excessive seat leakage.</p>	<p>-----NOTE-----                      LCO 3.0.4 is not applicable.</p>	<p><i>Full column with note</i></p>
	<p>D.1 Initiate action to close the Associated manual isolation valve(s).</p>	<p>Immediately</p>
	<p><u>AND</u>                      D.2 Restore ASD(s) to OPERABLE status.</p>	<p>30 days</p>
<p>E. Required Action and associated Completion Time not met.</p>	<p>E.1 Be in MODE 3.</p>	<p>6 hours</p>
	<p><u>AND</u>                      E.2 Be in MODE 4.</p>	<p>12 hours</p>

3.7 PLANT SYSTEMS

3.7.13 Emergency Exhaust System (EES)

LCO 3.7.13 Two EES trains shall be OPERABLE.

NOTE

The auxiliary or fuel building boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, 3, and 4,  
During movement of irradiated fuel assemblies in the fuel building.

NOTE

The SIS mode of operation is required only in MODES 1, 2, 3 and 4. The FBVIS mode of operation is required only during movement of irradiated fuel assemblies in the fuel building.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One EES train inoperable in MODE 1, 2, 3, or 4.	A.1 Restore EES train to OPERABLE status.	7 days
B. Two EES trains inoperable due to inoperable auxiliary building boundary in MODE 1, 2, 3 or 4.	B.1 Restore auxiliary building boundary to OPERABLE status.	24 hours

(continued)

3.7 PLANT SYSTEMS

3.7.16 Fuel Storage Pool Boron Concentration

LCO 3.7.16 The fuel storage pool boron concentration shall be  $\geq$  2165 ppm.

APPLICABILITY: When fuel assemblies are stored in the fuel storage pool and a fuel storage pool verification has not been performed since the last movement of fuel assemblies in the fuel storage pool.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>A. Fuel storage pool boron concentration not within limit.</p>	<p style="text-align: center;">-----NOTE----- LCO 3.0.3 is not applicable. -----</p>	<p style="text-align: center;"><i>Full column width note</i></p>
	<p>A.1 Suspend movement of fuel assemblies in the fuel storage pool.</p>	<p>Immediately</p>
	<p style="text-align: center;"><u>AND</u></p> <p>A.2.1 Initiate action to restore fuel storage pool boron concentration to within limit.</p>	<p>Immediately</p>
	<p style="text-align: center;"><u>OR</u></p> <p>A.2.2 Verify by administrative means that a non-Region 1 fuel storage pool verification has been performed since the last movement of fuel assemblies in the fuel storage pool.</p>	<p>Immediately</p>

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year, in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

1. Moderator Temperature Coefficient limits in Specification 3.1.3,
2. Shutdown Bank Insertion Limit for Specification 3.1.5,
3. Control Bank Insertion Limits for Specification 3.1.6,
4. Axial Flux Difference Limits for Specification 3.2.3,
5. Heat Flux Hot Channel Factor,  $F_Q(Z)$ ,  $F_Q^{RTP}$ ,  $K(Z)$ ,  $W(Z)$  and  $F_Q$  Penalty Factors for Specification 3.2.1,
6. Nuclear Enthalpy Rise Hot Channel Factor  $F_{\Delta H}$ ,  $F_{\Delta H}^{RTP}$ , and Power Factor Multiplier,  $PF_{\Delta H}$ , limits for Specification 3.2.2.
7. Shutdown Margin Limits for Specifications 3.1.1, 3.1.4, 3.1.5, and 3.1.6.

(continued)

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**ATTACHMENT 2**

**PROPOSED IMPROVED TECHNICAL SPECIFICATIONS – CLEAN COPY**

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1.0 USE AND APPLICATION

1.1 Definitions

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NOTE

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The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases.

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<u>Term</u>	<u>Definition</u>
ACTIONS	ACTIONS shall be that part of a Specification that prescribes Required Actions to be taken under designated Conditions within specified Completion Times.
ACTUATION LOGIC TEST	An ACTUATION LOGIC TEST shall be the application of various simulated or actual input combinations in conjunction with each possible interlock logic state required for OPERABILITY of a logic circuit and the verification of the required logic output. The ACTUATION LOGIC TEST, as a minimum, shall include a continuity check of output devices.
AXIAL FLUX DIFFERENCE (AFD)	AFD shall be the difference in normalized flux signals between the top and bottom halves of an excore neutron detector.
CHANNEL CALIBRATION	A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY. Calibration of instrument channels with resistance temperature detector (RTD) or thermocouple sensors may consist of an in-place qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel. The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps.
CHANNEL CHECK	A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter.

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(continued)

1.3 Completion Times

EXAMPLES

EXAMPLE 1.3-5 (continued)

If the Completion Time associated with a valve in Condition A expires, Condition B is entered for that valve. If the Completion Times associated with subsequent valves in Condition A expire, Condition B is entered separately for each valve and separate Completion Times start and are tracked for each valve. If a valve that caused entry into Condition B is restored to OPERABLE status, Condition B is exited for that valve.

Since the Note in this example allows multiple Condition entry and tracking of separate Completion Times, Completion Time extensions do not apply.

EXAMPLE 1.3-6

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One channel inoperable.	A.1 Perform SR 3.x.x.x.	Once per 8 hours
	<u>OR</u> A.2 Reduce THERMAL POWER to $\leq 50\%$ RTP.	8 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours

(continued)

3.7 PLANT SYSTEMS

3.7.2 Main Steam Isolation Valves (MSIVs)

LCO 3.7.2 Four MSIVs shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3

**ACTIONS**

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One MSIV inoperable in MODE 1.	A.1 Restore MSIV to OPERABLE status.	8 hours
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 2.	6 hours
C. ----- NOTE ----- Separate Condition entry is allowed for each MSIV. -----  One or more MSIVs inoperable in MODE 2 or 3.	C.1 Close MSIV.  <u>AND</u>  C.2 Verify MSIV is closed.	8 hours   Once per 7 days
D. Required Action and associated Completion Time of Condition C not met.	D.1 Be in MODE 3.  <u>AND</u>  D.2 Be in MODE 4.	6 hours   12 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>D. With one or more of the required ASD(s) inoperable because of excessive seat leakage.</p>	<p>----- NOTE ----- LCO 3.0.4 is not applicable. -----</p>	<p>Immediately</p>
	<p>D.1 Initiate action to close the Associated manual isolation valve(s).</p>	
	<p><u>AND</u></p> <p>D.2 Restore ASD(s) to OPERABLE status.</p>	
<p>E. Required Action and associated Completion Time not met.</p>	<p>E.1 Be in MODE 3.</p>	<p>6 hours</p>
	<p><u>AND</u></p>	
	<p>E.2 Be in MODE 4.</p>	<p>12 hours</p>

3.7 PLANT SYSTEMS

3.7.13 Emergency Exhaust System (EES)

LCO 3.7.13 Two EES trains shall be OPERABLE.

----- NOTE -----  
The auxiliary or fuel building boundary may be opened intermittently under administrative control.  
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APPLICABILITY: MODES 1, 2, 3, and 4,  
During movement of irradiated fuel assemblies in the fuel building.

----- NOTE -----  
The SIS mode of operation is required only in MODES 1, 2, 3 and 4. The FBVIS mode of operation is required only during movement of irradiated fuel assemblies in the fuel building.  
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**ACTIONS**

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One EES train inoperable in MODE 1, 2, 3, or 4.	A.1 Restore EES train to OPERABLE status.	7 days
B. Two EES trains inoperable due to inoperable auxiliary building boundary in MODE 1, 2, 3 or 4.	B.1 Restore auxiliary building boundary to OPERABLE status.	24 hours

(continued)

3.7 PLANT SYSTEMS

3.7.16 Fuel Storage Pool Boron Concentration

LCO 3.7.16 The fuel storage pool boron concentration shall be  $\geq 2165$  ppm.

APPLICABILITY: When fuel assemblies are stored in the fuel storage pool and a fuel storage pool verification has not been performed since the last movement of fuel assemblies in the fuel storage pool.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME	
<p>A. Fuel storage pool boron concentration not within limit.</p>	<p>----- NOTE ----- LCO 3.0.3 is not applicable. -----</p>		
	<p>A.1 Suspend movement of fuel assemblies in the fuel storage pool.</p>		<p>Immediately</p>
	<p><u>AND</u></p> <p>A.2.1 Initiate action to restore fuel storage pool boron concentration to within limit.</p>		<p>Immediately</p>
	<p><u>OR</u></p> <p>A.2.2 Verify by administrative means that a non-Region 1 fuel storage pool verification has been performed since the last movement of fuel assemblies in the fuel storage pool.</p>		<p>Immediately</p>

5.6 Reporting Requirements

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5.6.2 Annual Radiological Environmental Operating Report (continued)

reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year, in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
1. Moderator Temperature Coefficient limits in Specification 3.1.3,
  2. Shutdown Bank Insertion Limit for Specification 3.1.5,
  3. Control Bank Insertion Limits for Specification 3.1.6,
  4. Axial Flux Difference Limits for Specification 3.2.3,
  5. Heat Flux Hot Channel Factor,  $F_Q(Z)$ ,  $F_Q^{RTP}$ ,  $K(Z)$ ,  $W(Z)$  and  $F_Q$  Penalty Factors for Specification 3.2.1,
  6. Nuclear Enthalpy Rise Hot Channel Factor  $F_{\Delta H}$ ,  $F_{\Delta H}^{RTP}$ , and Power Factor Multiplier,  $PF_{\Delta H}$ , limits for Specification 3.2.2.
  7. Shutdown Margin Limits for Specifications 3.1.1, 3.1.4, 3.1.5, and 3.1.6.

(continued)