Industry/TSTF Standard Technical Specification Change Traveler

Deletion of TS 5.6.4, Monthly Operating Report

Classification:	3) Imp	 ecifici	ntions								
NUREGs Affect	ed: 🖌		1431	1432	1433	V	1434	 	 		

Description:

Currently, a monthly operating report (MOR) of operating statistics and shutdown experience is required to be submitted no later than the 13th of each month of the following month by Standard Technical Specifications (STS) section 5.6.4, Monthly Operating Reports. This change proposes the elimination of this periodic reporting requirement. (note: the deletion of the bracketed requirement in TS 5.6.4 for reporting safety/relief valve challenges has been previously approved by TSTE-258, Revision 4).

Justification:

Back abund

TS have historically included a requirement for the submittal of a MOR. The impetus for the MOR originally came from the 1973-1974 oil embargor. Draft Regulatory Guide 1.16, Revision 4, "Reporting of Operating Information - Appendix A Technical Specifications," published for comment in August 1975, identified operating statistics and shutdown experience information then desired for inclusion in the MOR. NRC initially compiled this information on a monthly basis and published it in hard copy form as NUREG-0020, "Licensed Operating Reactors - Status Summary Report" (commonly referred to as the "Gray Book"). However, publication of NUREG-0020 was discontinued after the December 1995 report.

NRC later issued Generic Letter ((IL) 97-02 informing Licensees that the scope of the information provided by the MOR could be reduced, and provided a template for the information to be submitted, which basically consisted of a compilation of power operating experience and power generation statistics. GL 97-02 stipulated, in part, that the MOR be submitted to provide data for two of the eight performance indicators (PIs) used by NRC to independently analyze nuclear power safety performance trends, and to confirm operational phases of events. GL 97-02 also indicated that the MOR supplied availability and capacity factors were provided to NRC senior managers, other government agencies, and Congress.

The PIs which used MOR data were published yearly in the Office for Analysis and Evaluation of Operational Data (AEOD) Annual Report (NUBEO-1272). However, as discussed in NRC Regulatory Issue Summary (RIS) 99-04, NRC announced the dissolution of AEOD, and that the NRC would no longer publish the AEOD annual report.

Need For Change

As discussed in the Justification of Change below, the basis for the preparation and submittal of a MOR has been superseded and, therefore, the TS requirement should be eliminated. This will eliminate the need for 12 submittals per year per site with an associated reduction in administrative burden and paperwork. This proposed change is consistent with ongoing NRC/industry initiatives to reduce administrative burdens related to requirements of low or no safety significance.

Justification of Change.

TS have historically included a requirement for the submittal of a MOR. Draft Regulatory Guide 1.16, Revision 4, "Reporting of Operating Information - Appendix A Technical Specifications," published for comment in August 1975, identified operating statistics and shutdown experience information then desired for inclusion in the MOR. NRC initially compiled this information on a monthly basis and published it in hard copy form as NUREG-0020, "Licensed Operating Reactors - Status Summary Report" (commonly referred to as the "Gray Book"). However, publication of NUREG-0020 was discontinued after the December 1995 report.

11/16/2000

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Per GL 97-02, the data provided in the monthly operating report to support the NUREG-1272 PIs included the number of reactor critical hours for the equipment forced outage indicator, the forced outage hours and generator on-line hours for the forced outage rate indicator, the number of forced outages for the equipment forced outage indicator, and the outage type (whether forced or scheduled) for the forced outage rate, and equipment forced outage indicators. Additionally, a history of reactor shutdowns, automatic or manual, was to be provided. However, as discussed in NRC Regulatory Issue Summary (RIS) 99-04, dated November 23, 1999, NRC announced the dissolution of AEOD, and that the NRC would no longer publish the AEOD Annual Report. Likewise, the previously referenced PIs are no longer being used by NRC.

RIS 99-04 also provided a cross reference which showed that most information formerly published in the AEOD annual report could be obtained from other sources. The only information provided in the AOED annual report derived from the MOR which is not directly readily available from other sources is associated with unit operating factors, capacity factors, and like data related to power generation statistics. Power generation statistics data is primarily business related, and is routinely collected and maintained for business and fiscal reasons by Licensees. This data is readily available on request, and does not, in itself, warrant formal submittal as a public record related to reactor safety.

Early in year 2000, NRC revised the reactor oversight process (ROP) to make it more risk-informed, objective, predictable, understandable, and focused on areas of greatest safety significance. Key features of the new program are a risk-informed regulatory framework, risk-informed inspections, a significance determination process to evaluate inspection findings, performance indicators, a streamlined assessment process, and more clearly defined actions NRC will take for plants based on their performance. A primary element of the revised ROP is a new set of PIs in seven key cornerstone areas, which are maintained by the Licensees and provided to NRC quarterly. The ROP PIs have been determined to be appropriate for measuring acceptable performance and each PI is designed to determine acceptable levels of operation within substantial safety margins. These objective criteria are designed to reflect risk according to established safety margins, as indicated by a color coding system.

For the Initiating Events cornerstone, there are three PIs that are measured: 1) unplanned reactor shutdowns, automatic and manual; 2) unplanned events that result in significant changes in reactor power; and 3) loss of normal reactor cooling system following unplanned shutdowns. It is seen that these three PIs envelop the shutdown experience information currently being provided in the MOR. Therefore, the quarterly reporting of the Initiating Events cornerstone shutdown and power reduction PIs supersedes the need to also provide shutdown information in the MOR.

In summary,

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The new ROP PIs have superseded the need to also provide shutdown history in the MOR, and

The periodic NRC reports (Gray book and AEOD Annual Reports) which used MOR data are no longer being published, or the information is available elsewhere, and

The duplication and more frequent reporting of operating experience in the MOR is an administrative burden which can be eliminated with no impact on reactor safety

Hence, the basis for a TS required MOR no longer exists and TS 5.6.4 may be deleted. This change has a positive safety benefit by reducing administrative burden on Licensees' staff.

Determination of No Significant Hazards Considerations

A change is proposed to the Improved Standard Technical Specifications (STS), NUREGs 1430, 1431, 1432, 1433, and 1434, to eliminate TS 5.6.4, the TS reporting requirement for submittal of a monthly operating report.

In accordance with the criteria set forth in 10 CFR 50.92, the Industry has evaluated these proposed Improved Technical Specification changes and determined they do not represent a significant hazards consideration. The following is provided in support of this conclusion.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change eliminates the TS requirement to provide a monthly operating report. This change is an administrative reporting requirement and, as such, cannot affect initiators of analyzed events or mitigation of accidents or transients. Therefore, the proposed amend_{vinent} does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously analyzed?

The proposed change does not involve a physical alteration of the plant, add any new equipment, or require any existing equipment to be operated in a manner different from the present design. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in the margin of safety?

This change is an administrative change to reporting requirements of plant operating information and data, and will not reduce a margin of safety because it has no effect on any safety analyses assumptions. For these reasons, the proposed amendment does not involve a significant reduction in the margin of safety.

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Revision History

levision 0	Revision	Status: Active	Next Action: NRC
Revision Proposed by: Bro	wns Ferry		
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Owners Group Review	Informati	on	
Date Originated by OG: 19	-Sep-00		
Owners Group Comments (No Comments)			
Owners Group Resolution:	Approved	Date: 30-Sep-00	
TSTF Review Informa	tion		
TSTF Received Date: 30-	Sep-00	Date Distributed	for Review 07-Nov-00
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ncorporation In	to the NUREGs	
File to BBS/LAN Dat	e: TSTF Informed Date:	TSTF Approved Date:
NUREG Rev Incorpo	rated:	
Affected Technic	al Specifications	
1.0	CORE OPERATING LIMITS REPORT (COLR)	
1.0	PRESSURE AND TEMPERATURE LIMITS REPORT (PT	LR)
5.6.4	Monthly Operating Reports Change Description: Deleted	
5.6.5	CORE OPERATING LIMITS REPORT (COLR)	
	Change Description: Renumbered to 5.6.4	
5.6.6	Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)	
	Change Description: Renumbered to 5.6.5	
5.6.7	EDG Failures Report Change Description: Renumbered to 5.6.6	
5.6.8	PAM Report	
	Change Description: Renumbered to 5.6.7	
5.6.9	Tendon Surveillance Report	NUREG(s)- 1430 1431 1432 Only
	Change Description: Renumbered to 5.6.8	
5.6.10	Steam Generator Tube Inspection Report	NUREG(s)- 1430 1431 1432 Only
	Change Description: Renumbered to 5.6.9	
Action 3.3.17.B	PAM Instrumentation	NUREG(s)- 1430 Only
Action 3.3.17.B Bases	PAM Instrumentation	NUREG(s)- 1430 Only
Action 3.3.17.G	PAM Instrumentation	NUREG(s)- 1430 Only

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Action 3.3.17.G E	Bases PAM Instrumentation	NUREG(s)- 1430 Only
Action 3.3.3.B	PAM Instrumentation	NUREG(s)- 1431 Only
Action 3.3.3.B Ba	ISES PAM Instrumentation	NUREG(s)- 1431 Only
Action 3.3.3.G	PAM Instrumentation	NUREG(s)- 1431 Only
Action 3.3.3.G Ba	ases PAM Instrumentation	NUREG(s)- 1431 Only
Action 3.3.11.B	PAM Instrumentation (Analog)	NUREG(s)- 1432 Only
Action 3.3.11.B	PAM Instrumentation (Digital)	NUREG(s)- 1432 Only
Action 3.3.11.B B	ases PAM Instrumentation (Analog)	NUREG(s)- 1432 Only
Action 3.3.11.B B	ases PAM Instrumentation (Digital)	NUREG(s)- 1432 Only
Action 3.3.11.G	PAM Instrumentation (Analog)	NUREG(s)- 1432 Only
Action 3.3.11.G	PAM Instrumentation (Digital)	NUREG(s)- 1432 Only
Action 3.3.11.G E	Bases PAM Instrumentation (Analog)	NUREG(s)- 1432 Only
Action 3.3.11.G E	Bases PAM Instrumentation (Digital)	NUREG(s)- 1432 Only
Action 3.3.3.1.B	PAM Instrumentation	NUREG(s)- 1433 1434 Only
Action 3.3.3.1.B	Bases PAM Instrumentation	NUREG(s)- 1433 1434 Only
Action 3.3.3.1.G	PAM Instrumentation	NUREG(s)- 1433 1434 Only
Action 3.3.3.1.G	Bases PAM Instrumentation	NUREG(s)- 1433 1434 Only

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Definitions 1.1

1.1 Definitions

CORE ALTERATION (continued)

CORE OPERATING LIMITS REPORT (COLR)

DOSE EQUIVALENT I-131

Ē — AVERAGE DISINTEGRATION ENERGY

EFFECTIVE FULL POWER DAY (EFPD)

EMERGENCY FEEDWATER INITIATION AND CONTROL (EFIC) RESPONSE TIME ALTERATIONS shall not preclude completion of movement of a component to a safe position.

The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific limits shall be determined for each reload cycle in accordance with Specification 5.6 Plant operation within these limits is addressed in individual Specifications.

DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in [Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites," or those listed in Table E-7 of Regulatory Guide 1.109, Rev. 1, NRC, 1977, or ICRP 30, Supplement to Part 1, page 192-212, Table titled, "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity"].

 \bar{E} shall be the average (weighted in proportion to the concentration of each radionuclide in the reactor coolant at the time of sampling) of the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives > [15] minutes, making up at least 95% of the total noniodine activity in the coolant.

EFPD shall be the ratio of the number of hours of production of a given THERMAL POWER to 24 hours, multiplied by the ratio of the given THERMAL POWER to the RTP. One EFPD is equivalent to the thermal energy produced by operating the reactor core at RTP for one full day.

The EFIC RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its EFIC actuation setpoint at the channel sensor until the emergency feedwater equipment is

(continued)

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1.1 Definitions (continued)

PHYSICS TES	
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PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation.

These tests are:

- a. Described in Chapter [14, Initial Test Program] of the FSAR;
- b. Authorized under the provisions of 10 CFR/50.59; or
- c. Otherwise approved by the Nuclear Regulatory Commission.

The PTLR is the unit specific document that provides the reactor vessel pressure and temperature limits, including heatup and cooldown rates, for the current reactor vessel fluence period. These pressure and temperature limits shall be determined for each fluence period in accordance with Specification 5.6 Plant operation within these operating limits is addressed in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits," and LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System."

QPT shall be defined by the following equation and is expressed as a percentage.

 $QPT = 100 \left(\frac{Power in any Core Quadrant}{Average Power of all Quadrants} - 1 \right)$

RTP shall be a total reactor core heat transfer rate to the reactor coolant of [2544] MWt.

The RPS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its RPS trip setpoint at the channel sensor until electrical power is interrupted at the control rod drive trip breakers. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.

PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

QUADRANT POWER TILT (OPT)

RATED THERMAL POWER (RTP)

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REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME

3.3 INSTRUMENTATION

3.3.17 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.17 The PAM instrumentation for each Function in Table 3.3.17-1 shall be OPERABLE.

-----NOTES-

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

1. LCO 3.0.4 is not applicable.

2. Separate Condition entry is allowed for each Function.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more Functions with one required channel inoperable.	A.1	Restore required channel to OPERABLE status.	30 days
Β.	Required Action and associated Completion Time of Condition A not met.	B.1	Initiate action in accordance with Specification 5.6.	Immediately
C.	NOTE Not applicable to hydrogen monitor channels.	C.1	Restore one channel to OPERABLE status.	7 days
	One or more Functions with two required channels inoperable.			

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. Two required hydrogen monitor channels inoperable.	D.1 Restore one required hydrogen monitor channel to OPERABLE status.	72 hours
E. Required Action and associated Completion Time of Condition C or D not met.	E.1 Enter the Condition referenced in Table 3.3.17-1 for the channel.	Immediately
F. As required by Required Action E.1 and referenced in Table 3.3.17-1.	F.1 Be in MODE 3. <u>AND</u>	6 hours
	F.2 Be in MODE 4.	12 hours
G. As required by Required Action E.1 and referenced in Table 3.3.17-1.	G.1 Initiate action in accordance with Specification 5.6.	Immediately

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5.6 Reporting Requirements (continued)

Monthly Operating Reports .6,4 Routine reports of operating statistics and shutdown experience[, including documentation of all challenges to the pressurizer power operated relief valves or pressurizer safety valves,] shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report. CORE OPERATING LIMITS REPORT (COLR) 5.6.5 Core operating limits shall be established prior to each a . 🦿 reload cycle, or prior to any remaining portion of a reload cycle. and shall be documented in the COLR for the following: The individual specifications that address core operating limits must be referenced here. b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents: Identify the Topical Report(s) by number, title, date, and NRC staff approval document, or identify the staff Safety Evaluation Report for a plant specific methodology by NRC letter and date. с. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling System (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met. **d**.' The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC. 5.6.6 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) a. RCS pressure and temperature limits for heat up, cooldown, low temperature operation, criticality, and hydrostatic

Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS 5.6.6 REPORT (PTLR) (continued) testing as well as heatup and cooldown rates shall be established and documented in the PTLR for the following: [The individual specifications that address RCS pressure and temperature limits must be referenced here.] b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents: [Identify the NRC staff approval document by date.] The PTLR shall be provided to the NRC upon issuance for each C. reactor vessel fluence period and for any revision or supplement thereto. Reviewer's Notes: The methodology for the calculation of the P-T limits for NRC approval should include the following provisions: The methodology shall describe how the neutron fluence is 1. calculated (reference new Regulatory Guide when issued). The Reactor Vessel Material Surveillance Program shall 2. comply with Appendix H to 10 CFR 50. The reactor vessel material irradiation surveillance specimen removal schedule shall be provided, along with how the specimen examinations shall be used to update the PTLR curves. Low Temperature Overpressure Protection (LTOP) System lift 3. setting limits for the Power Operated Relief Valves (PORVs), developed using NRC-approved methodologies may be included in the PTLR. The adjusted reference temperature (ART) for each reactor 4. beltline material shall be calculated, accounting for radiation embrittlement, in accordance with Regulatory Guide 1.99, Revision 2. The limiting ART shall be incorporated into the calculation 5. of the pressure and temperature limit curves in accordance with NUREG-0800 Standard Review Plan 5.3.2, Pressure-Temperature Limits.

BWOG STS

Rev 1, 04/07/95

Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) (continued) The minimum temperature requirements of Appendix G to 10 CFR 6. Part 50 shall be incorporated into the pressure and temperature limit curves. Licensees who have removed two or more capsules should 7. compare for each surveillance material the measured increase in reference temperature (RT_{NDT}) to the predicted increase in RT_{NDT}; where the predicted increase in RT_{NDT} is based on the mean shift in RT_{NDT} plus the two standard deviation value $(2\sigma_{A})$ specified in Regulatory Guide 1.99, Revision 2. If the measured value exceeds the predicted value (increase in RT_{NDT} + $2\sigma_{\rm o}$), the licensee should provide a supplement to the PTLR to demonstrate how the results affect the approved methodology. EDG Failures Report If an individual emergency diesel generator (EDG) experiences four or more valid failures in the last 25 demands, these failures and any nonvalid failures experienced by that EDG in that time period shall be reported within 30 days. Reports on EDG failures shall include the information recommended in Regulatory Guide 1.9, Revision 3, Regulatory Position C.5, or existing Regulatory Guide 1.108 reporting requirement. PAM Report 5.6.4

When a report is required by Condition B or G of LCO 3.3.[17], "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6 Reporting Requirements (continued)

5.6.9

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5.6.H



Any abnormal degradation of the containment structure detected during the tests required by the Pre-stressed Concrete Containment Tendon Surveillance Program shall be reported to the NRC within 30 days. The report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective action taken.

Steam Generator Tube Inspector Report

Reviewer's Note: Reports required by the Licensee's current licensing basis regarding steam generator tube surveillance requirements shall be included here. An appropriate administrative controls format should be used.

Reviewer's Note: These reports may be required covering inspection, test, and maintenance activities. These reports are determined on an individual basis for each unit and their preparation and submittal are designated in the Technical Specifications.

PAM Instrumentation B 3.3.17

ACTIONS (continued)

Function listed in Table 3.3.17-1. The Completion Time(s) of the inoperable channels of a Function will be tracked separately for each Function starting from the time the Condition was entered for that Function.

<u>A.1</u>

When one or more Functions have one required channel inoperable, the inoperable channel must be restored to OPERABLE status within 30 days. The 30 day Completion Time is based on operating experience. This takes into account the remaining OPERABLE channel (or, in the case of a Function that has only one required channel, other non-Regulatory Guide 1.97 instrument channels to monitor the Function), the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

<u>B.1</u>

Required Action B.1 specifies initiation of action described in Specification 5.6.8, that requires a written report to be submitted to the NRC. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative actions. This action is appropriate in lieu of a shutdown requirement since alternative actions are identified before loss of functional capability and given the likelihood of unit conditions that would require information provided by this instrumentation. The Completion Time of "Immediately" for Required Action B.1 ensures the requirements of Specification 5.6.8 are initiated.

<u>C.1</u>

When one or more Functions have two required channels inoperable (i.e., two channels inoperable in the same Function), one channel in the Function should be restored to OPERABLE status within 7 days. This Condition does not apply to the hydrogen monitor channels. The Completion Time of 7 days is based on the relatively low probability

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BASES

ACTIONS

F.1 (continued)

achieve this status, the unit must be brought to at least MODE 3 within 6 hours and MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

<u>G.1</u>

At this unit, alternative means of monitoring Containment Area Radiation have been developed and tested. These alternative means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allowed time.

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If these alternative means are used, the Required Action is not to shut the unit down, but rather to follow the directions of Specification 5.6.8, in the Administrative Controls section of the Technical Specifications. The report provided to the NRC should discuss the alternative means used, describe the degree to which the alternative means are equivalent to the installed PAM channels, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal PAM channels.

In the case of reactor vessel level, Reference 4 determined that the appropriate Required Action was not to shut the unit down, but rather to follow the directions of Specification 5.6.6



At this unit, the alternative monitoring provisions consist of the following:

SURVEILLANCE REQUIREMENTS As noted at the beginning of the SRs, the SRs apply to each PAM instrumentation Function in Table 3.3.17-1.

1.1 Definitions (continued)

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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.
CHANNEL OPERATIONAL TEST (COT)	A COT shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify the OPERABILITY of required alarm, interlock, display, and trip functions. The COT shall include adjustments, as necessary, of the required alarm, interlock, and trip setpoints so that the setpoints are within the required range and accuracy.
CORE ALTERATION	CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.
CORE OPERATING LIMITS REPORT (COLR)	The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific parameter limits shall be determined for each reload cycle in accordance with Specification 5.6. Plant operation within these limits is addressed in individual Specifications.
DOSE EQUIVALENT I-131	DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in [Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites," or those listed in Table E-7 of Regulatory Guide 1.109, Rev. 1, NRC, 1977, or ICRP 30, Supplement to Part 1, page

1.1 Definitions	
PHYSICS TESTS (continued)	a. Described in Chapter [14, Initia] Test Program] of the FSAR;
	 Authorized under the provisions of 10 CFR 50.59; or
	c. Otherwise approved by the Nuclear Regulatory Commission.
PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)	The PTLR is the unit specific document that provides the reactor vessel pressure and temperature limits, including heatup and cooldown rates, for the current reactor vessel fluence period. These pressure and temperature limits shall be determined for each fluence period in accordance with Specification 5.6.6. Plant operation within these operating limits is addressed in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits," and LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System."
QUADRANT POWER TILT RATIO (QPTR)	QPTR shall be the ratio of the maximum upper excore detector calibrated output to the average of the upper excore detector calibrated outputs, or the ratio of the maximum lower excore detector calibrated output to the average of the lower excore detector calibrated outputs, whichever is greater.
RATED THERMAL POWER (RTP)	RTP shall be a total reactor core heat transfer rate to the reactor coolant of [2893] MWt.
REACTOR TRIP SYSTEM (RTS) RESPONSE TIME	The RTS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its RTS trip setpoint at the channel sensor until loss of stationary gripper coil voltage. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.
SHUTDOWN MARGIN (SDM)	SDM shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming:

(continued)

3.3 INSTRUMENTATION

3.3.3 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3 The PAM instrumentation for each Function in Table 3.3.3-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

NOTES--

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1. LCO 3.0.4 is not applicable.

2. Separate Condition entry is allowed for each Function.

	CONDITION	REQUIRED ACTION	COMPLETION TIME
Α.	One or more Functions with one required channel inoperable.	A.1 Restore required channel to OPERABLE status.	30 days
в.	Required Action and associated Completion Time of Condition A not met.	B.1 Initiate action in accordance with Specification 5.6.8.	Immediately
с.	NOTE Not applicable to hydrogen monitor channels.	C.1 Restore one channel to OPERABLE status.	7 days
	One or more Functions with two required channels inoperable.		

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CONDITION			REQUIRED ACTION	COMPLETION TIME
D.	Two hydrogen monitor channels inoperable.	D.1	Restore one hydrogen monitor channel to OPERABLE status.	72 hours
Ε.	Required Action and associated Completion Time of Condition C or D not met.	E.1	Enter the Condition referenced in Table 3.3.3-1 for the channel.	Immediately
F.	As required by Required Action E.1 and referenced in Table 3.3.3-1.	F.1 <u>AND</u>	Be in MODE 3.	6 hours 12 hours
		F.2	Be in MODE 4.	
G.	As required by Required Action E.1 and referenced in Table 3.3.3-1.	G.1	Initiate action in accordance with Specification 5.6.	Immediately

5.6 Reporting Requirements (continued)



5.6.	<u>Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS</u> <u>REPORT (PTLR)</u> (continued)
Ś	testing as well as heatup and cooldown rates shall be established and documented in the PTLR for the following: [The individual specifications that address RCS pressure and temperature limits must be referenced here.]
	b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and spp+oved by the NRC, specifically those described in the following documents: [Identify the NRC staff approval document by date.]
	c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.
	Reviewers' Notes: The methodology for the calculation of the P-T limits for NRC approval should include the following provisions:
	1. The methodology shall describe how the neutron fluence is calculated (reference new Regulatory Guide when issued).
	2. The Reactor Vessel Material Surveillance Program shall comply with Appendix H to 10 CFR 50. The reactor vessel material irradiation surveillance specimen removal schedule shall be provided, along with how the specimen examinations shall be used to update the PTLR curves.
	3. Low Temperature Overpressure Protection (LTOP) System lift setting limits for the Power Operated Relief Valves (PORVs), developed using NRC-approved methodologies may be included in the PTLR.
	4. The adjusted reference temperature (ART) for each reactor beltline material shall be calculated, accounting for radiation embrittlement, in accordance with Regulatory Guide 1.99, Revision 2.
	5. The limiting ART shall be incorporated into the calculation of the pressure and temperature limit curves in accordance with NUREG-0800 Standard Review Plan 5.3.2, Pressure- Temperature Limits.

(continued)

Reporting Requirements 5.6

5.6 Reporting Requirements



RT_{NDT}; where the predicted increase in RT_{NDT} is based on the mean shift in RT_{NDT} plus the two standard deviation value $(2\sigma_{\lambda})$ specified in Regulatory Guide 1.99, Revision 2. If the measured value exceeds the predicted value (increase RT_{NDT} + $2\sigma_{\lambda}$), the licensee should provide a supplement to the PTLR to demonstrate how the results affect the approved methodology.

EDG Failure Report

If an individual emergency diesel generator (EDG) experiences four or more valid failures in the last 25 demands, these failures and any nonvalid failures experienced by that EDG in that time period shall be reported within 30 days. Reports on EDG failures shall include the information recommended in Regulatory Guide 1.9, Revision 3, Regulatory Position C.5, or existing Regulatory Guide 1.108 reporting requirement.

PAM Report

When a report is required by Condition B or G of LCO 3.3.[3], "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

(continued)

5.6.

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5.6 Reporting Requirements (continued)



BASES

ACTIONS (continued)

Condition A applies when one or more Functions have one required channel that is inoperable. Required Action A.1 requires restoring the inoperable channel to OPERABLE status within 30 days. The 30 day Completion Time is based on operating experience and takes into account the remaining OPERABLE channel (or in the case of a Function that has only one required channel, other non-Regulatory Guide 1.97 instrument channels to monitor the Function), the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

<u>B.1</u>

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A.1

Condition B applies when the Required Action and associated Completion Time for Condition A are not met. This Required Action specifies initiation of actions in Specification 5.6.8, which requires a written report to be submitted to the NRC immediately. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative actions. This action is appropriate in lieu of a shutdown requirement since alternative actions are identified before loss of functional capability, and given the likelihood of unit conditions that would require information provided by this instrumentation.

<u>C.1</u>

Condition C applies when one or more Functions have two inoperable required channels (i.e., two channels inoperable in the same Function). Required Action C.1 requires restoring one channel in the Function(s) to OPERABLE status within 7 days. The Completion Time of 7 days is based on the relatively low probability of an event requiring PAM instrument operation and the availability of alternate means to obtain the required information. Continuous operation with two required channels inoperable in a Function is not acceptable because the alternate indications may not fully meet all performance qualification requirements applied to the PAM instrumentation. Therefore, requiring restoration

BASES

ACTIONS <u>F.1 and F.2</u> (continued)

from full power conditions in an orderly manner and without challenging unit systems.

<u>G.1</u>

At this unit, alternate means of monitoring Reactor Vessel Water Level and Containment Area Radiation have been developed and tested. These alternate means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allotted time. If these alternate means are used, the Required Action is not to shut down the unit but rather to follow the directions of <u>Specification 5.6</u> (3), in the Administrative Controls section of the TS. The report provided to the NRC should discuss the alternate means are equivalent to the installed PAM channels, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal PAM channels.

SURVEILLANCE REQUIREMENTS

A Note has been added to the SR Table to clarify that SR 3.3.3.1 and SR 3.3.3.3 apply to each PAM instrumentation Function in Table 3.3.3-1.

SR 3.3.3.1

Performance of the CHANNEL CHECK once every 31 days ensures that a gross instrumentation failure has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION. The high radiation instrumentation

1.1 Definitions (continued)

CORE ALTERATION shall be the movement or CORE ALTERATION manipulation of any fuel, sources, or reactivity control components [excluding control element assemblies (CEAs) withdrawn into the upper guide structure], within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position. CORE OPERATING LIMITS The COLR is the unit specific document that provides cycle specific parameter limits for the REPORT (COLR) current reload cycle. These cycle specific parameter limits shall be determined for each reload cycle in accordance with Specification 5.6, 5) Plant operation within these limits is (4^{-}) addressed in individual Specifications. DOSE EQUIVALENT I-131 DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose conversion factors used for this calculation shall be those listed in [Table III of TID-14844, AEC, 1962, "Calculation of Distance Factors for Power and Test Reactor Sites," or those listed in Table E-7 of Regulatory Guide 1.109, Rev. 1, NRC, 1977, or ICRP 30, Supplement to Part 1, page 192-212, Table titled, "Committed Dose Equivalent in Target Organs or Tissues per Intake of Unit Activity"]. **Ē**—AVERAGE E shall be the average (weighted in proportion DISINTEGRATION ENERGY to the concentration of each radionuclide in the reactor coolant at the time of sampling) of the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives > [15] minutes, making up at least 95% of the total noniodine activity in the coolant. ENGINEERED SAFETY The ESF RESPONSE TIME shall be that time interval FEATURE (ESF) RESPONSE from when the monitored parameter exceeds its ESF TIME actuation setpoint at the channel sensor until the

(continued)

ESF equipment is capable of performing its safety

1.1 Definitions (continued)

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MODE	A MODE shall correspond to any one inclusive combination of core reactivity condition, power level, average reactor coolant temperature, and reactor vessel head closure bolt tensioning specified in Table 1.1-1 with fuel in the reactor vessel.			
OPERABLE—OPERABILITY	A system, subsystem, train, component, or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified safety function(s) and when all necessary attendant instrumentation, controls, normal or emergency electrical power, cooling and seal water, lubrication, and other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its specified safety function(s) are also capable of performing their related support function(s).			
PHYSICS TESTS	PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation. These tests are:			
	a. Described in Chapter [14, Initial Test Program] of the FSAR;			
	 Authorized under the provisions of 10 CFR 50.59; or 			
	c. Otherwise approved by the Nuclear Regulatory Commission.			
PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)	The PTLR is the unit specific document that provides the reactor vessel pressure and temperature limits, including heatup and cooldown rates, for the current reactor vessel fluence period. These pressure and temperature limits shall be determined for each fluence period in accordance with Specification 5.5(5). Plant operation within these operating limits is addressed in LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits." and LCO 3.4.12. "Low			

Temperature (P/T) Limits," and LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP) System."

PAM Instrumentation (Analog) 3.3.11

3.3 INSTRUMENTATION

3.3.11 Post Accident Monitoring (PAM) Instrumentation (Analog)

LCO 3.3.11 The PAM instrumentation for each Function in Table 3.3.11-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

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ACTIONS

1. LCO 3.0.4 is not applicable.

2. Separate Condition entry is allowed for each Function.

	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more Functions with one required channel inoperable.	A.1	Restore required channel to OPERABLE status.	30 days
Β.	Required Action and associated Completion Time of Condition A not met.	B.1	Initiate action in accordance with Specification 5.6.8	Immediately
C.	NOTE Not applicable to hydrogen monitor channels. One or more Functions with two required channels inoperable.	C.1	Restore one channel to OPERABLE status.	7 days

TSTF-369 PAM Instrumentation (Analog) 3.3.11

	CONDITION	REQUIRED ACTION	COMPLETION TIME
D.	Two hydrogen monitor channels inoperable.	D.1 Restore one hydrogen monitor channel to OPERABLE status.	72 hours
Ε.	Required Action and associated Completion Time of Condition C or D not met.	E.1 Enter the Condition referenced in Table 3.3.11-1 for the channel.	Immediately
F.	As required by Required Action E.1 and referenced in Table 3.3.11-1.	F.1 Be in MODE 3. AND F.2 Be in MODE 4.	6 hours 12 hours
G.	As required by Required Action E.1 and referenced in Table 3.3.11-1.	G.1 Initiate action in accordance with Specification 5.6.8.	Immediately

TSTE-369 PAM Instrumentation (Digital) 3.3.11

3.3 INSTRUMENTATION

3.3.11 Post Accident Monitoring (PAM) Instrumentation (Digital)

LCO 3.3.11 The PAM instrumentation for each Function in Table 3.3.11-1 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTIONS

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1. LCO 3.0.4 not applicable.

2. Separate Condition entry is allowed for each Function.

CONDITION		REQUIRED ACTION		COMPLETION TIME
Α.	One or more Functions with one required channel inoperable.	A.1	Restore required channel to OPERABLE status.	30 days
Β.	Required Action and associated Completion Time of Condition A not met.	B.1	Initiate action in accordance with Specification 5.6.8. 7	Immediately
с.	NOTE Not applicable to hydrogen monitor channels.	C.1	Restore one channel to OPERABLE status.	7 days
	One or more Functions with two required channels inoperable.			

TSTE-369

PAM Instrumentation (Digital) 3.3.11

	CONDITION		REQUIRED ACTION	COMPLETION TIME	
D.	Two hydrogen monitor channels inoperable.	D.1	Restore one hydrogen monitor channel to OPERABLE status.	72 hours	
E .	Required Action and associated Completion Time of Condition C or D not met.	E.1	Enter the Condition referenced in Table 3.3.11-1 for the channel.	Immediately	
F.	As required by Required Action E.1 and referenced in Table 3.3.11-1.	F.1 <u>AND</u> F.2	Be in MODE 3. Be in MODE 4.	6 hours 12 hours	
G.	As required by Required Action E.1 and referenced in Table 3.3.11-1.	G.1	Initiate action in accordance with Specification 5.6.5. 7	Immediately	

5.6.2 Annual Radiological Environmental Operating Report (continued)

(ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period purjuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements [in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979]. [The report shall identify the TLD results that represent collocated dosimeters in relation to the NRC TLD program and the exposure period associated with each result.] In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the 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

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted 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 50, Appendix I, Section IV.B.1.

5.6.4 <u>Monthly Operating Reports</u>

Routine reports of operating statistics and shutdown experience[, including documentation of all challenges to the pressurizer



5.6.	<u>Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS</u> <u>REPORT (PTLR)</u> (continued)
E	testing as well as heatup and cooldown rates shall be established and documented in the PTLR for the following: [The individual specifications that address RCS pressure and temperature limits must be referenced here.]
	b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents: [Identify the NRC staff approval document by date.]
	c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.
	Reviewers' Notes: The methodology for the calculation of the P-T limits for NRC approval should include the following provisions:
	1. The methodology shall describe how the return fluence is calculated (reference new Regulatory Guide when issued).
	2. The Reactor Vessel Material Surveillance Program shall comply with Appendix H to CFR 50. The reactor vessel material irradiation surveillance specimen removal schedule shall be provided, along with how the specimen examinations shall be used to update the PTLR curves.
	3. Low Temperature Overpressure Protection (LTOP) System lift setting limits for the Power Operated Relief Valves (PORVs), developed using NRC-approved methodologies may be included in the PTLR.
	4. The adjusted reference temperature (ART) for each reactor beltline material shall be calculated, accounting for radiation embrittlement, in accordance with Regulatory Guide 1.99, Revision 2.
	5. The limiting ART shall be incorporated into the calculation of the pressure and temperature limit curves in accordance with NUREG-0800 Standard Review Plan 5.3.2, Pressure- Temperature Limits.
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5.6.

<u>Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS</u> <u>REPORT (PTLR)</u> (continued)

6. The minimum temperature requirements of Appendix G to 10 CFR Part 50 shall be incorporated into the pressure and temperature limit curves.

Licensees who have removed two or more capsules should compare for each surveillance material the measured increase in reference temperature (RT_{NDT}) to the predicted increase in RT_{NDT} ; where the predicted increase in RT_{NDT} is based on the mean shift in RT_{NDT} plus the two standard deviation value $(2\sigma_{A})$ specified in Regulatory Guide 1.99, Revision 2. If measured value exceeds the predicted value (increase in RT_{NDT} + $2\sigma_{A}$), the licensee should provide a supplement to the PTLR to demonstrate how the results affect the approved methodology.

5.6.K

EDG Failures Report

If an individual emergency diesel generator (EDG) experiences four or more valid failures in the last 25 demands, these failures and any non valid failures experienced by that EDG in that time period shall be reported within 30 days. Reports on EDG failures shall include the information recommended in Regulatory Guide 1.9, Revision 3, Regulatory Position C.5, or existing Regulatory Guide 1.108 reporting requirement.

PAM Report

When a report is required by Condition B or G of LCO 3.3.[11], "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6.9) B

Tendon Surveillance Report

Any abnormal degradation of the containment structure detected during the tests required by the Pre-Stressed Concrete Containment Tendon Surveillance Program shall be reported to the NRC within


BASES

ACTIONS

A.1 (continued)

passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

<u>B.1</u>

This Required Action specifies initiation of actions in accordance with Specification 5.6.8, which requires a written report to be submitted to the Nuclear Regulatory Commission. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative Required Actions. This Required Action is appropriate in lieu of a shutdown requirement, given the likelihood of plant conditions that would require information provided by this instrumentation. Also, alternative Required Actions are identified before a loss of functional capability condition occurs.

<u>C.1</u>

When one or more Functions have two required channels inoperable (i.e., two channels inoperable in the same Function), one channel in the Function should be restored to OPERABLE status within 7 days. The Completion Time of 7 days is based on the relatively low probability of an event requiring PAM instrumentation operation and the availability of alternate means to obtain the required information. Continuous operation with two required channels inoperable in a Function is not acceptable because the alternate indications may not fully meet all performance qualification requirements applied to the PAM instrumentation. Therefore, requiring restoration of one inoperable channel of the Function limits the risk that the PAM Function will be in a degraded condition should an accident occur.

<u>D.1</u>

When two required hydrogen monitor channels are inoperable, Required Action D.1 requires one channel to be restored to

TSTF-369 PAM Instrumentation (Analog) B 3.3.11

BASES

ACTIONS

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shut down the plant, but rather to follow the directions of Specification 5.6 The report provided to the NRC should discuss the alternate means used, describe the degree to which the alternate means are equivalent to the installed PAM channels, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal PAM channels.

SURVEILLANCE REQUIREMENTS

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A Note at the beginning of the Surveillance Requirements specifies that the following SRs apply to each PAM instrumentation Function in Table 3.3.11-1.

SR 3.3.11.1

<u>G.1</u> (continued)

Performance of the CHANNEL CHECK once every 31 days ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between the two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. A CHANNEL CHECK will detect gross channel failure; thus, it is key to verifying the instrumentation continues to operate properly between each CHANNEL CALIBRATION.

Agreement criteria are determined by the plant staff based on a combination of the channel instrument uncertainties, including indication and readability. If a channel is outside the criteria, it may be an indication that the sensor or the signal processing equipment has drifted outside its limit. If the channels are within the criteria, it is an indication that the channels are OPERABLE. If the channels are normally off scale during times when surveillance is required, the CHANNEL CHECK will only verify that they are off scale in the same direction. Off scale low current loop channels are verified to be reading at the bottom of the range and not failed downscale.

BASES

ACTIONS <u>A.1</u> (continued)

assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

<u>B.1</u>

This Required Action specifies initiation of actions in accordance with Specification 5.6.23 which requires a written report to be submitted to the Nuclear Regulatory Commission. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative Required Actions. This Required Action is appropriate in lieu of a shutdown requirement, given the likelihood of plant conditions that would require information provided by this instrumentation. Also, alternative Required Actions are identified before a loss of functional capability condition occurs.

C.1

When one or more Functions have two required channels inoperable (i.e., two channels inoperable in the same Function), one channel in the Function should be restored to OPERABLE status within 7 days. The Completion Time of 7 days is based on the relatively low probability of an event requiring PAM instrumentation operation and the availability of alternate means to obtain the required information. Continuous operation with two required channels inoperable in a Function is not acceptable because the alternate indications may not fully meet all performance qualification requirements applied to the PAM instrumentation. Therefore, requiring restoration of one inoperable channel of the Function limits the risk that the PAM Function will be in a degraded condition should an accident occur.

<u>D.1</u>

When two required hydrogen monitor channels are inoperable, Required Action D.1 requires one channel to be restored to OPERABLE status. This Required Action restores the monitoring

ACTIONS

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<u>D.1</u> (continued)

capability of the hydrogen monitor. The 72 hour Completion Time is based on the relatively low probability of an event requiring hydrogen monitoring and the availability of alternative means to obtain the required information. Continuous operation with two required channels inoperable is not acceptable because alternate indications are not available.

<u>E.1</u>

This Required Action directs entry into the appropriate Condition referenced in Table 3.3.11-1. The applicable Condition referenced in the Table is Function dependent. Each time Required Action C.1 or D.1 is not met, and the associated Completion Time has expired, Condition E is entered for that channel and provides for transfer to the appropriate subsequent Condition.

F.1 and F.2

If the Required Action and associated Completion Time of Condition C are not met and Table 3.3.11-1 directs entry into Condition F, the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems.

<u>G.1</u>

At this plant, alternate means of monitoring Reactor Vessel Water Level and Containment Area Radiation have been developed and tested. These alternate means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allotted time. If these alternate means are used, the Required Action is not to shut down the plant, but rather to follow the directions of Specification 5.6. The report provided to the NRC should

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1.1 Definitions

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CHANNEL CHECK (continued)	status derived from independent instrument channels measuring the same parameter.
CHANNEL FUNCTIONAL TEST	A CHANNEL FUNCTIONAL TEST shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY, including required alarm, interlock, display, and trip functions, and channel failure trips. The CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total channel steps so that the entire channel is tested.
CORE ALTERATION	CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel. The following exceptions are not considered to be CORE ALTERATIONS:
	a. Movement of source range monitors, local power range monitors, intermediate range monitors, traversing incore probes, or special movable detectors (including undervessel replacement); and
	b. Control rod movement, provided there are no fuel assemblies in the associated core cell.
	Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.
CORE OPERATING LIMITS REPORT (COLR)	The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific limits shall be determined for each reload cycle in accordance with Specification 5.6.9. Plant operation within these limits is addressed in individual Specifications.
DOSE EQUIVALENT I-131	DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The thyroid dose
	(continued)

Rev 1, 04/07/95

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1.1 Definitions

PHYSICS TESTS	These tests are:				
(continued)	a. Described in Chapter [14, Initial Test Program] of the FSAR;				
	 b. Authorized under the provisions of 10 CFR 50.59; or 				
	c. Otherwise approved by the Nuclear Regulatory				
PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)	The PTLR is the unit specific document that provides the reactor vessel pressure and temperature limits, including heatup and cooldown rates, for the current reactor vessel fluence period. These pressure and temperature limits shall be determined for each fluence period in accordance with Specification 5.6.0. Plant operation within these operating limits is addressed in LCO 3.4.10, "RCS Pressure and Temperature (P/T) Limits."				
RATED THERMAL POWER (RTP)	RTP shall be a total reactor core heat transfer rate to the reactor coolant of [2436] MWt.				
REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME	The RPS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its RPS trip setpoint at the channel sensor until de-energization of the scram pilot valve solenoids. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.				
SHUTDOWN MARGIN (SDM)	SDM shall be the amount of reactivity by which the reactor is subcritical or would be subcritical assuming that:				
	a. The reactor is xenon free;				
	b. The moderator temperature is 68°F; and				
	c. All control rods are fully inserted except for the single control rod of highest reactivity worth, which is assumed to be fully withdrawn.				
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3.3 INSTRUMENTATION

3.3.3.1 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3.1 The PAM instrumentation for each Function in Table 3.3.3.1-1 shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

2. Separate Condition entry is allowed for each Function.

-	CONDITION		REQUIRED ACTION	COMPLETION TIME
Α.	One or more Functions with one required channel inoperable.	A.1	Restore required channel to OPERABLE status.	30 days
Β.	Required Action and associated Completion Time of Condition A not met.	B.1	Initiate action in accordance with Specification 5.6.8	Immediately
с.	NOTE Not applicable to [hydrogen monitor] channels.	C.1	Restore one required channel to OPERABLE status.	7 days
	One or more Functions with two required channels inoperable.			

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CONDITION			REQUIRED ACTION	COMPLETION TIME
D.	Two [required hydrogen monitor] channels inoperable.	D.1	Restore one [required hydrogen monitor] channel to OPERABLE status.	72 hours
Ε.	Required Action and associated Completion Time of Condition C or D not met.	E.1	Enter the Condition referenced in Table 3.3.3.1-1 for the channel.	Immediately
F.	As required by Required Action E.1 and referenced in Table 3.3.3.1-1.	F.1	Be in MODE 3.	12 hours
G.	As required by Required Action E.1 and referenced in Table 3.3.3.1-1.	G.1	Initiate action in accordance with Specification 5.6.8.	Immediately

5.6.2 Annual Radiological Environmental Operating Report (continued)

(ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements [in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979]. [The report shall identify the TLD results that represent collocated dosimeters in relation to the NRC TLD program and the exposure period associated with each result.] In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the 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

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted 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 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience[, including documentation of all challenges to the safety/relief

5.6.4 Monthly Operating Reports (continued) valves.] shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report. 5.6.50 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: The individual specifications that address core operating limits must be referenced here. The analytical methods used to determine the core operating **b**. limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents: Identify the Topical Report(s) by number, title, date, and NRC staff approval document, or identify the staff Safety Evaluation Report for a plant specific methodology by NRC letter and date. The core operating limits shall be determined such that all **C**. applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met. The COLR, including any midcycle revisions or supplements, d. shall be provided upon issuance for each reload cycle to the NRC. 5.6.6 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) RCS pressure and temperature limits for heatup, cooldown, a. low temperature operation, critically, and hydrostatic testing as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:

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Rev 1, 04/07/95

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5.6 Reporting Requirements

5.6.05	Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) (continued)
	[The individual specifications that address RCS pressure and temperature limits must be referenced here.]
	b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents. [Identify the NRC staff approval document by date.]
	c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.
	Reviewers' Notes: The methodology for the calculation of the P-T limits for NRC approval should include the following provisions:
	1. The methodology shall describe how the neutron fluence is calculated (reference new Regulatory Guide when issued).
	2. The Reactor Vessel Material Surveillance Program shall comply with Appendix H to 10 CFR 50. The reactor vessel material irradiation surveillance specimen removal schedule shall be provided, along with how the specimen examinations shall be used to update the PTLR curves.
	3. Low Temperature Overpressure Protection (LTOP) System lift setting limits for the Power Operated Relief Valves (PORVs), developed using NRC-approved methodologies may be included in the PTLR.
	4. The adjusted reference temperature (ART) for each reactor beltline material shall be calculated, accounting for radiation embrittlement, in accordance with Regulatory Guide 1.99, Revision 2.
	5. The limiting ART shall be incorporated into the calculation of the pressure and temperature limit curves in accordance with NUREG-0800 Standard Review Plant 5.3.2, Pressure- Temperature Limits.
	 The minimum temperature requirements of Appendix G to 10 CFR Part 50 shall be incorporated into the pressure and temperature limit curves.
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BWR/4 STS

Rev 1, 04/07/95

5.6.6

<u>Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS</u> REPORT (PTLR) (continued)

7. Licensees who have removed two or more capsules should compare for each surveillance material the measured increase in reference temperature (RT_{NDT}) to the predicted increase in RT_{NDT} ; where the predicted increase in RT_{NDT} is based on the mean shift in RT_{NDT} plus the two standard deviation value $(2\sigma_{A})$ specified in Regulatory Guide 1.99, Revision 2. If the measured value exceeds the predicted value (increase in $RT_{NDT} + 2\sigma_{A}$), the licensee should provide a supplement to the PTLR to demonstrate how the results affect the approved methodology.

EDG Failures Report

If an individual emergency diesel generator (EDG) experiences four or more valid failures in the last 25 demands, these failures and any nonvalid failures experienced by that EDG in that time period shall be reported within 30 days. Reports on EDG failures shall include the information recommended in Regulatory Guide 1.9, Revision 3, Regulatory Position C.5, or existing Regulatory Guide 1.108 reporting requirement.

5.6.8 D PAM Report

When a report is required by Condition B or G of LCO 3.3.[3.1], "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

Reviewer's Note: These reports may be required covering inspection, test, and maintenance activities. These reports are determined on an individual basis for each unit and their preparation and submittal are designated in the Technical Specifications.

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PAM Instrumentation B 3.3.3.1

BASES

ACTIONS (continued) Note 2 has been provided to modify the ACTIONS related to PAM instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable PAM instrumentation channels provide appropriate compensatory measures for separate Functions. As such, a Note has been provided that allows separate Condition entry for each inoperable PAM Function.

<u>A.1</u>

When one or more Functions have one required channel that is inoperable, the required inoperable channel must be restored to OPERABLE status within 30 days. The 30 day Completion Time is based on operating experience and takes into account the remaining OPERABLE channels (or, in the case of a Function that has only one required channel, other non-Regulatory Guide 1.97 instrument channels to monitor the Function), the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

<u>B.1</u>

If a channel has not been restored to OPERABLE status in 30 days, this Required Action specifies initiation of action in accordance with Specification 5.6.8, which requires a written report to be submitted to the NRC. This report discusses the results of the root cause evaluation of the inoperability and identifies proposed restorative actions. This action is appropriate in lieu of a shutdown requirement, since alternative actions are identified before loss of functional capability, and given the likelihood of plant conditions that would require information provided by this instrumentation.

(continued)

BASES

ACTIONS (continued)

For the majority of Functions in Table 3.3.3.1-1, if any Required Action and associated Completion Time of Condition C or D are not met, the plant must be brought to a MODE in which the LCO not apply. To achieve this status, the plant must be brought to at least MODE 3 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems:

<u>G.1</u>

F.1

Since alternate means of monitoring primary containment area radiation have been developed and tested, the Required Action is not to shut down the plant, but rather to follow the directions of Specification 5.6.8. These alternate means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allotted time. The report provided to the NRC should discuss the alternate means used, describe the degree to which the alternate means are equivalent to the installed PAM channels, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal PAM channels.

SURVEILLANCE The following SRs apply to each PAM instrumentation Function REQUIREMENTS in Table 3.3.3.1-1.

<u>SR 3.3.3.1.1</u>

Performance of the CHANNEL CHECK once every 31 days ensures that a gross failure of instrumentation has not occurred. A CHANNEL CHECK is normally a comparison of the parameter indicated on one channel against a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between instrument channels could be an indication of excessive instrument drift in one of the channels or something even more serious. A CHANNEL CHECK will detect

1.1 Definitions

CHANNEL CHECK (continued)	status derived from independent instrument channels measuring the same parameter.
CHANNEL FUNCTIONAL TEST	A CHANNEL FUNCTIONAL TEST shall be the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY, including required alarm, interlock, display, and trip functions, and channel failure trips. The CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, overlapping, or total channel steps so that the entire channel is tested.
CORE ALTERATION	CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel. The following exceptions are not considered to be CORE ALTERATIONS:
	a. Movement of source range monitors, local power range monitors, intermediate range monitors, traversing incore probes, or special movable detectors (including undervessel replacement);
	b. Control rod movement, provided there are no fuel assemblies in the associated core cell.
	Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.
CORE OPERATING LIMITS REPORT (COLR)	The COLR is the unit specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific limits shall be determined for each reload cycle in accordance with Specification 5.6.5. Plant operation within these limits is addressed in individual Specifications.
DOSE EQUIVALENT I-131	DOSE EQUIVALENT I-131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134,

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and I-135 actually present. The thyroid dose

Rev 1, 04/07/95

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1.1 Definitions (continued)

PHYSICS TESTS	PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation. These tests are:
	a. Described in Chapter [14, Initial Test Program] of the FSAR;
	 Authorized under the provisions of 10 CFR 50.59; or
	c. Otherwise approved by the Nuclear Regulatory Commission.
PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)	The PTLR is the unit specific document that provides the reactor vessel pressure and temperature limits, including heatup and cooldown rates, for the current reactor vessel fluence period. These pressure and temperature limits shall be determined for each fluence period in accordance with Specification 5.6.6. Plant operation within these operating limits is addressed in LCO 3.4.11, "RCS Pressure and Temperature (P/T) Limits."
RATED THERMAL POWER (RTP)	RTP shall be a total reactor core heat transfer rate to the reactor coolant of [3833] MWt.
REACTOR PROTECTION SYSTEM (RPS) RESPONSE TIME	The RPS RESPONSE TIME shall be that time interval from when the monitored parameter exceeds its RPS trip setpoint at the channel sensor until de-energization of the scram pilot valve solenoids. The response time may be measured by means of any series of sequential, overlapping, or total steps so that the entire response time is measured.
SHUTDOWN MARGIN (SDM)	SDM shall be the amount of reactivity by which the reactor is subcritical or would be subcritical assuming that:
	a. The reactor is xenon free;
	b. The moderator temperature is 68°F; and
	사람이 있는 것은 이가 이 모든 것을 확실할 수 있는 것이 가지 않는 것이 가지 않는 것이다. 이가 있는 것이다. 같은 것은 것은 것이 같은 것은 것은 것은 것을 많은 것이 같은 것이 같은 것이 같은 것이 같이 있는 것이다.

3.3 INSTRUMENTATION

3.3.3.1 Post Accident Monitoring (PAM) Instrumentation

LCO 3.3.3.1 The PAM instrumentation for each Function in Table 3.3.3.1-1 shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

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1. LCO 3.0.4 is not applicable.

2. Separate Condition entry is allowed for each Function.

CONDITION		REQUIRED ACTION		COMPLETION TIME
Α.	One or more Functions with one required channel inoperable.	A.1	Restore required channel to OPERABLE status.	30 days
Β.	Required Action and associated Completion Time of Condition A not met.	B.1	Initiate action in accordance with Specification 5.6.8.	Immediately
C.	NOTE Not applicable to [hydrogen monitor] channels.	C.1	Restore one required channel to OPERABLE status.	7 days
	One or more Functions with two required channels inoperable.			

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	CONDITION		REQUIRED ACTION	COMPLETION TIME
D.	Two [required hydrogen monitor] channels inoperable.	D.1	Restore one [required hydrogen monitor] channel to OPERABLE status.	72 hours
Ε.	Required Action and associated Completion Time of Condition C or D not met.	E.1	Enter the Condition referenced in Table 3.3.3.1-1 for the channel.	Immediately
F .	As required by Required Action E.1 and referenced in Table 3.3.3.1-1.	F.1	Be in MODE 3.	12 hours
G.	As required by Required Action E.1 and referenced in Table 3.3.3.1-1.	G.1	Initiate action in accordance with Specification 5.6.(9). 7	Immediately

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5.6.2 <u>Annual Radiological Environmental Operating Report</u> (continued)

(ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements [in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979]. [The report shall identify the TLD results that represent collocated dosimeters in relation to the NRC TLD program and the exposure period associated with each result.] In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactiv

Radioactive Effluent Release Report

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit shall be submitted 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 50, Appendix I, Section IV.B.1.

5.6.4

Monthly Operating Reports

Routine reports of operating statistics and shutdown experience[, including documentation of all challenges to the safety/relief

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5.6.4 Monthly Operating Reports (continued) valves,] shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report. 5.6.3)4 CORE OPERATING LIMITS REPORT (COLR) Core operating limits shall be established prior to each a. reload cycle, or prior to my remaining portion of a reload cycle, and shall be documented in the COLR for the following: The individual specifications that address core operating limits must be referenced here. The analytical methods used to determine the core operating b. limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents: Identify the Topical Report(s) by number, title, date, and NRC staff approval document, or identify the staff Safety Evaluation Report for a plant specific methodology by NRC letter and date. The core operating limits shall be determined such that all с. applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met. The COLR, including any midcycle revisions or supplements, d. shall be provided upon issuance for each reload cycle to the NRC. 5.6.6 5 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) RCS pressure and temperature limits for heatup, cooldown, a. low temperature operation, criticality, and hydrostatic testing as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:

5.6.05 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) (continued) [The individual specifications that address RCS pressure and temperature limits must be referenced here.] b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents: [Identify the NRC staff approval document by date.] The PTLR shall be provided to the NRC upon issuance for each **c**. reactor vessel fluence period and for any revision or supplement thereto. Reviewer's Notes: The methodology for the calculation of the P-T limits for NRC approval should include the following provisions: 1. The methodology shall describe how the neutron fluence is calculated (reference new Regulatory Guide when issued). 2. The Reactor Vessel Material Surveillance Program shall comply with Appendix H to 10 CFR 50. The reactor vessel material irradiation surveillance specimen removal schedule shall be provided, along with how the specimen examinations shall be used to update the PTLR curves. 3. Low Temperature Overpressure Protection (LTOP) System lift setting limits for the Power Operated Relief Valves (PORVs), developed using NRC-approved methodologies may be included in the PTLR. 4. The adjusted reference temperature (ART) for each reactor beltline material shall be calculated, accounting for radiation embrittlement, in accordance with Regulatory Guide 1.99, Revision 2. 5. The limiting ART shall be incorporated into the calculation of the pressure and temperature limit curves in accordance with NUREG-0800 Standard Review Plan 5.3.2, Pressure-Temperature Limits.

5.6.05 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) (continued) 6. The minimum temperature requirements of Appendix G to 10 CFR Part 50 shall be incorporated into the pressure and temperature limit curves. 7. Licensees who have removed two or more capsules should compare for each surveillance material the measured increase in reference temperature (RT_{wnT}) to the predicted increase in RT_{NDT} ; where the predicted increase in RT_{NDT} is based on the mean shift in RT_{NDT} plus the two standard deviation value $(2\sigma_{A})$ specified in Regulatory Guide 1.99, Revision 2. If the measured value exceeds the predicted value (increase in RT_{NDT} + $2\sigma_{\rm A}$), the licensee should provide a supplement to the PTLR to demonstrate how the results affect the approved methodology. 5.6.00

EDG Failure Reports

If an individual emergency diesel generator (EDG) experiences four or more valid failures in the last 25 demands, these failures and any nonvalid failures experienced by that EDG in that time period shall be reported within 30 days. Reports on EDG failures shall include the information recommended in Regulatory Guide 1.9, Revision 3, Regulatory Position C.5, or existing Regulatory Guide 1.108 reporting requirement.

5.6.8

PAM Report

When a Special Report is required by Condition B or G of LCO 3.3.[3.1], "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

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Tendon Surveillance Report

Any abnormal degradation of the containment structure detected during the tests required by the Pre-Stressed Concrete

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5.6.9	<u>Tendon Surveillance Report</u> (continued)
	Containment Tendon Surveillance Program shall be reported to the NRC within 30 days. The report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective action taken.
	Reviewer's Note: These reports may be required covering inspection, test, and maintenance activities. These reports are determined on an individual basis for each unit and their preparation and submittal are designated in the Technical Specifications.

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BASES (continued)

ACTIONS

Note 1 has been added to the ACTIONS to exclude the MODE change restriction of LCO 3.0.4. This exception allows entry into the applicable MODE while relying on the Actions even though the Actions may eventually require plant shutdown. This exception is acceptable due to the passive function of the instruments, the operator's ability to diagnose an accident using alternate instruments and methods, and the low probability of an event requiring these instruments.

A Note has also been provided to modify the ACTIONS related to PAM instrumentation channels. Section 1.3, Completion Times, specifies that once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition. Section 1.3 also specifies that Required Actions of the Condition continue to apply for each additional failure, with Completion Times based on initial entry into the Condition. However, the Required Actions for inoperable PAM instrumentation channels provide appropriate compensatory measures for separate inoperable functions. As such, a Note has been provided that allows separate Condition entry for each inoperable PAM Function.

<u>A.1</u>

When one or more Functions have one required channel that is inoperable, the required inoperable channel must be restored to OPERABLE status within 30 days. The 30 day Completion Time is based on operating experience and takes into account the remaining OPERABLE channel (or in the case of a Function that has only one required channel, other non-Regulatory Guide 1.97 instrument channels to monitor the Function), the passive nature of the instrument (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring PAM instrumentation during this interval.

<u>B.1</u>

If a channel has not been restored to OPERABLE status in 30 days, this Required Action specifies initiation of actions in accordance with Specification 5.6.8, which

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BASES

ACTIONS (continued)

This Required Action directs entry into the appropriate Condition referenced in Table 3.3.3.1-1. The applicable Condition referenced in the Table is Function dependent. Each time an inoperable channel has not met any Required Action of Condition C or D, as applicable, and the associated Completion Time has expired, Condition E is entered for that channel and provides for transfer to the appropriate subsequent Condition.

<u>F.1</u>

E.1

For the majority of Functions in Table 3.3.3.1-1, if any Required Action and associated Completion Time of Condition C or D is not met, the plant must be placed in a MODE in which the LCO does not apply. This is done by placing the plant in at least MODE 3 within 12 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required plant condition from full power conditions in an orderly manner and without challenging plant systems.

<u>G.1</u>

Since alternate means of monitoring primary containment area radiation have been developed and tested, the Required Action is not to shut down the plant but rather to follow the directions of Specification 5.6.8. These alternate means may be temporarily installed if the normal PAM channel cannot be restored to OPERABLE status within the allotted time. The report provided to the NRC should discuss the alternate means used, describe the degree to which the alternate means are equivalent to the installed PAM channels, justify the areas in which they are not equivalent, and provide a schedule for restoring the normal PAM channels.

SURVEILLANCE REQUIREMENTS The following SRs apply to each PAM instrumentation Function in Table 3.3.3.1-1.