

May 15, 2001

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Mr. John K. Wood
Vice President - Nuclear, Perry
FirstEnergy Nuclear Operating Company
P.O. Box 97, A200
Perry, OH 44081

**SUBJECT: PERRY NUCLEAR POWER PLANT, UNIT 1 - ISSUANCE OF AMENDMENT
RE: INCORPORATION OF TECHNICAL SPECIFICATION TASK FORCE
PROCESS CHANGES (TAC NOS. MB0525 THROUGH MB0538)**

Dear Mr. Wood:

The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment No. 120 to Facility Operating License No. NPF-58 for the Perry Nuclear Power Plant (PNPP), Unit 1. This amendment revises the Technical Specifications (TSs) in response to your application dated November 9, 2000 (PY-CEI/NRR-2523L), as supplemented by letter dated April 23, 2001 (PY-CEI/NRR-2559L).

This amendment revises the TSs by approving thirteen of the simpler, generic administrative/editorial/consistency improvements agreed upon between the Nuclear Energy Institute (NEI) Technical Specification Task Force (TSTF) and the Nuclear Regulatory Commission (NRC), subsequent to the conversion of the PNPP TSs to the improved Standard Technical Specifications.

A copy of the Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

/ RA /

Douglas V. Pickett, Sr. Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-440

- Enclosures: 1. Amendment No. 120 to License No. NPF-58
- 2. Safety Evaluation

DOCUMENT NAME: G:\PDIII-2\PERRY\14 TSTF amd.wpd

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NAME	D Pickett	T Harris <i>JH</i>	R Dennig*	<i>W Beckner</i>	A Mendiola
DATE	<i>4/30/01</i>	<i>4/27/01</i>	3/7/01	<i>5/09/01</i>	<i>5/10/01</i>

*See RDennig to AMendiola memorandum dated 3/7/01 **OFFICIAL RECORD COPY**

LIRR-058



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 15, 2001

Mr. John K. Wood
Vice President - Nuclear, Perry
FirstEnergy Nuclear Operating Company
P.O. Box 97, A200
Perry, OH 44081

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Sincerely,

A handwritten signature in cursive script that reads "Douglas V. Pickett".

Douglas V. Pickett, Sr. Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-440

Enclosures: 1. Amendment No. 120 to
License No. NPF-58
2. Safety Evaluation

cc w/encls: See next page

J. Wood
FirstEnergy Nuclear Operating Company

Perry Nuclear Power Plant, Units 1 and 2

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

FIRSTENERGY NUCLEAR OPERATING COMPANY

DOCKET NO. 50-440

PERRY NUCLEAR POWER PLANT, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 120
License No. NPF-58

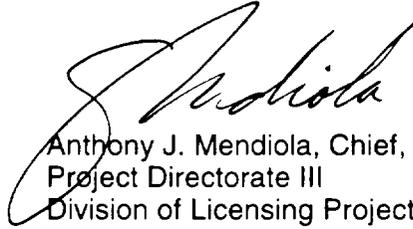
1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by the FirstEnergy Nuclear Operating Company (the licensee) dated November 9, 2000, as supplemented by letter dated April 23, 2001, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-58 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 120 are hereby incorporated into this license. The FirstEnergy Nuclear Operating Company shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented not later than 90 days after issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Anthony J. Mendiola, Chief, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: May 15, 2001

ATTACHMENT TO LICENSE AMENDMENT NO. 120

FACILITY OPERATING LICENSE NO. NPF-58

DOCKET NO. 50-440

Replace the following pages of the Appendix "A" Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

<u>Remove</u>	<u>Insert</u>
2.0-1	2.0-1
2.0-2	-----
3.0-2	3.0-2
3.1-7	3.1-7
3.1-8	3.1-8
3.8-25	3.8-25
3.8-32	3.8-32
3.8-33	3.8-33
5.0-2	5.0-2
5.0-3	5.0-3
5.0-4	5.0-4
5.0-9	5.0-9
5.0-10	5.0-10
5.0-13	5.0-13
5.0-15a	5.0-15a
5.0-16	5.0-16
5.0-17	5.0-17
5.0-19	5.0-19

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 With the reactor steam dome pressure < 785 psig or core flow < 10% rated core flow:

THERMAL POWER shall be \leq 23.8% RTP.

2.1.1.2 With the reactor steam dome pressure \geq 785 psig and core flow \geq 10% rated core flow:

MCPR shall be \geq 1.10 for two recirculation loop operation or \geq 1.11 for single recirculation loop operation.

2.1.1.3 Reactor vessel water level shall be greater than the top of active irradiated fuel.

2.1.2 Reactor Coolant System Pressure SL

Reactor steam dome pressure shall be \leq 1325 psig.

2.2 SL Violations

With any SL violation, the following actions shall be completed within 2 hours:

2.2.1 Restore compliance with all SLs; and

2.2.2 Insert all insertable control rods.

3.0 LCO APPLICABILITY

LCO 3.0.4
(continued) specified conditions in the Applicability that are required to comply with ACTIONS, or that are part of a shutdown of the unit.

Exceptions to this Specification are stated in the individual Specifications.

LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.10, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

(continued)

3.1 REACTIVITY CONTROL SYSTEMS

3.1.3 Control Rod OPERABILITY

LCO 3.1.3 Each control rod shall be OPERABLE.

APPLICABILITY: MODES 1 and 2.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each control rod.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One withdrawn control rod stuck.	-----NOTE----- A stuck rod may be bypassed in the Rod Action Control System (RACS) in accordance with SR 3.3.2.1.9 if required to allow continued operation. -----	
	A.1 Verify stuck control rod separation criteria are met.	Immediately
	<u>AND</u> A.2 Disarm the associated control rod drive (CRD). <u>AND</u>	2 hours (continued)

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	<p>A.3 Perform SR 3.1.3.2 and SR 3.1.3.3 for each withdrawn OPERABLE control rod.</p> <p><u>AND</u></p> <p>A.4 Perform SR 3.1.1.1.</p>	<p>24 hours from discovery of Condition A concurrent with THERMAL POWER greater than or equal to the low power setpoint (LPSP) of the Rod Pattern Control System (RPCS).</p> <p>72 hours</p>
B. Two or more withdrawn control rods stuck.	B.1 Be in MODE 3.	12 hours
C. One or more control rods inoperable for reasons other than Condition A or B.	<p>C.1 -----NOTE----- Inoperable control rods may be bypassed in RACS in accordance with SR 3.3.2.1.9, if required, to allow insertion of inoperable control rod and continued operation. -----</p> <p>Fully insert inoperable control rod.</p> <p><u>AND</u></p> <p>C.2 Disarm the associated CRD.</p>	<p>3 hours</p> <p>4 hours</p>

(continued)

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.8.4.1	Verify battery terminal voltage is ≥ 129 V on float charge.	7 days
SR 3.8.4.2	<p>Verify no visible corrosion at battery terminals and connectors.</p> <p><u>OR</u></p> <p>Verify battery connection resistance is</p> <p>≤ 5.0 E-5 ohm for inter-cell connections, ≤ 5.0 E-5 ohm for inter-rack connections, ≤ 5.0 E-5 ohm for inter-tier connections, ≤ 5.0 E-5 ohm for terminal connections; for Div 1 and Div 2</p> <p>and</p> <p>≤ 1.0 E-4 ohm for inter-cell connections, ≤ 1.0 E-4 ohm for inter-rack connections, ≤ 1.0 E-4 ohm for inter-tier connections, ≤ 1.0 E-4 ohm for terminal connections. for Div 3.</p>	92 days
SR 3.8.4.3	Verify battery cells, cell plates, and racks show no visual indication of physical damage or abnormal deterioration that could degrade battery performance.	24 months
SR 3.8.4.4	Remove visible corrosion, and verify battery cell to cell and terminal connections are coated with anti-corrosion material.	24 months

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.6 Battery Cell Parameters

LCO 3.8.6 Battery cell parameters for the Division 1, 2, and 3 batteries shall be within limits.

APPLICABILITY: When associated DC electrical power subsystems are required to be OPERABLE.

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each battery.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more batteries with one or more battery cell parameters not within Table 3.8.6-1 Category A or B limits.	A.1 Verify pilot cell's electrolyte level and float voltage meet Table 3.8.6-1 Category C limits.	1 hour
	<u>AND</u>	
	A.2 Verify battery cell parameters meet Table 3.8.6-1 Category C limits.	24 hours <u>AND</u> Once per 7 days thereafter
	<u>AND</u>	
	A.3 Restore battery cell parameters to Table 3.8.6-1 Category A and B limits.	31 days

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>B. Required Action and associated Completion Time of Condition A not met.</p> <p><u>OR</u></p> <p>One or more batteries with average electrolyte temperature of the representative cells < 72°F.</p> <p><u>OR</u></p> <p>One or more batteries with one or more battery cell parameters not within Table 3.8.6-1 Category C limits.</p>	<p>B.1 Declare associated battery inoperable.</p>	<p>Immediately</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.6.1 Verify battery cell parameters meet Table 3.8.6-1 Category A limits.</p>	<p>7 days</p>

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant specific titles of the personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the USAR;
- b. The plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;
- c. A specified corporate executive shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and
- d. The individuals who train the operating staff, carry out radiation protection duties, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

(continued)

5.2 Organization (continued)

5.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A non-licensed operator shall be on site when fuel is in the reactor vessel, and an additional non-licensed operator shall be on site while the unit is in MODE 1, 2, or 3.
- b. Deleted
- c. Shift crew composition may be one less than the minimum requirements of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.g for a period of time not to exceed two hours in order to accommodate unexpected absence of on-duty shift crew members, provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- d. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.
- e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed SROs, licensed ROs, radiation protection technicians, auxiliary operators, and key maintenance personnel). The procedures shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime.

Any deviation from the working hour guidelines shall be authorized in advance by the Plant Manager or his designees, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that the individual overtime shall be reviewed monthly by the Plant Manager or his designees to ensure that excessive hours have not been assigned. Routine deviation from the working hour guidelines is not authorized.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

- 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions as modified by Specification 5.2.2.f, except for the radiation protection manager, who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the licensed Reactor Operators and Senior Reactor Operators, who shall comply with the requirements of 10 CFR 55.
- 5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).
-

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;
- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the site boundary as follows:
 - 1. for noble gases: ≤ 500 mrem/yr to the whole body and ≤ 3000 mrem/yr to the skin, and
 - 2. for iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives > 8 days: ≤ 1500 mrem/yr to any organ;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from the unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the USAR, Section 3.9.1.1, cyclic and transient occurrences to ensure that the reactor vessel is maintained within the design limits.

(continued)

5.5 Programs and Manuals (continued)

5.5.6 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

- a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as follows:

<u>ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing activities</u>	<u>Required frequencies for performing inservice testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

- b. The provisions of SR 3.0.2 are applicable to the above required frequencies for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS.

5.5.7 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in Regulatory Guide 1.52, Revision 2.

(continued)

5.5 Programs and Manuals

5.5.8 Explosive Gas and Storage Tank Radioactivity Monitoring Program
(continued)

- b. A surveillance program to ensure that the quantity of radioactivity contained in any temporary outdoor tanks not including liners for shipping radwaste is ≤ 10 curies, excluding tritium and dissolved or entrained noble gases.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

5.5.9 Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
1. an API gravity or an absolute specific gravity within limits,
 2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
 3. a clear and bright appearance with proper color;
- b. Within 31 days following addition of the new fuel oil to storage tanks, verify that the properties of the new fuel oil, other than those addressed in a., above, are within limits for ASTM 2D fuel oil; and
- c. Total particulate concentration of the fuel oil in the storage tanks is ≤ 10 mg/l when tested every 31 days in accordance with ASTM D-2276.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program testing frequencies.

(continued)

5.5 Programs and Manuals

5.5.12 Primary Containment Leakage Rate Testing Program (continued)

- BN-TOP-1 methodology may be used for Type A tests.
- The corrections to NEI 94-01 which are identified on the Errata Sheet attached to the NEI letter, "Appendix J Workshop Questions and Answers," dated March 19, 1996 are considered an integral part of NEI 94-01.
- The containment isolation check valves in the Feedwater penetrations are tested per the Inservice Testing Program (Technical Specification 5.5.6).

The peak calculated primary containment internal pressure for the design basis loss of coolant accident is 6.40 psig. For conservatism P_a is defined as 7.80 psig.

The maximum allowable primary containment leakage rate, L_a , shall be 0.20% of primary containment air weight per day at the peak containment pressure (P_a).

Leakage rate acceptance criteria are:

- a. Primary containment leakage rate acceptance criterion is $\leq 1.0 L_a$. However, during the first unit startup following testing performed in accordance with this Program, the leakage rate acceptance criteria are $< 0.6 L_a$ for the Type B and Type C tests, and $\leq 0.75 L_a$ for the Type A tests:
- b. Air lock testing acceptance criteria are:
 - 1) Overall air lock leakage rate is ≤ 2.5 scfh when tested at $\geq P_a$.
 - 2) For each door, leakage rate is ≤ 2.5 scfh when the gap between the door seals is pressurized to $\geq P_a$.

The provisions of SR 3.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

Nothing in these Technical Specifications shall be construed to modify the testing frequencies required by 10 CFR 50, Appendix J.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions, (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescent dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totalling < 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose equivalent received from external sources should be assigned to specific major work functions.

The Occupational Radiation Exposure Report covering the activities of the unit for the previous year shall be submitted by April 30 of each year.

5.6.2 Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous year shall be submitted by May 1 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (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

(continued)

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. 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

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted by May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the 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, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

5.6.5 Core Operating Limits Report (COLR)

- a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:
 1. LCO 3.2.1, Average Planar Linear Heat Generation Rate (APLHGR),
 2. LCO 3.2.2, Minimum Critical Power Ratio (MCPR),
 3. LCO 3.2.3, Linear Heat Generation Rate (LHGR),

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.7 High Radiation Area

5.7.1 Pursuant to 10 CFR 20, paragraph 20.1601(c), in lieu of the requirements of 10 CFR 20.1601(a), each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is > 100 mrem/hr but < 1000 mrem/hr, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., radiation protection technicians) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel are aware of them.
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the radiation protection supervisor in the RWP.

5.7.2 In addition to the requirements of Specification 5.7.1, areas accessible to personnel with radiation levels such that a major portion of the body could receive in 1 hour a dose ≥ 1000 mrem shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the shift supervisor on duty or the radiation protection supervisor. Doors shall remain locked except during periods of access by personnel under an approved RWP.

(continued)



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 120 TO FACILITY OPERATING LICENSE NO. NPF-58
FIRSTENERGY NUCLEAR OPERATING COMPANY
PERRY NUCLEAR POWER PLANT, UNIT 1
DOCKET NO. 50-440

1.0 INTRODUCTION

By letter dated November 9, 2000, as supplemented by letter dated April 23, 2001, FirstEnergy Nuclear Operating Company submitted a license amendment request for the Perry Nuclear Power Plant, Unit 1 (PNPP). This request includes fourteen of the simpler, generic administrative/editorial/consistency improvements agreed upon between the Nuclear Energy Institute (NEI) Technical Specification Task Force (TSTF) and the Nuclear Regulatory Commission (NRC), subsequent to the conversion of the PNPP Technical Specifications to the improved Standard Technical Specifications. The proposed changes are as follows:

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| TSTF 5 | Delete Notification, Reporting, And Restart Requirements If A Safety Limit Is Violated |
| TSTF 32 | Slow/Stuck Control Rod Separation Criteria |
| TSTF 38 | Revise Visual Surveillance Of Batteries To Specify Inspection Is For Performance Degradation |
| TSTF 52 | Implement 10 CFR Part 50, Appendix J, Option B |
| TSTF 65 | Use Of Generic Titles For Utility Positions |
| TSTF 104 | Relocate to the Bases the Discussion of Exceptions to Limiting Condition for Operation (LCO) 3.0.4 |
| TSTF 106 | Change to Diesel Fuel Oil Testing Program |
| TSTF 118 | Administrative Controls Program Exceptions |
| TSTF 152 | Revise Reporting Requirements to be Consistent with 10 CFR Part 20 |
| TSTF 153 | Clarify Exception Notes to be Consistent with the Requirement Being Excepted |
| TSTF 166 | Correct Inconsistency Between LCO 3.0.6 and the Safety Function Determination Program (SFDP) Regarding Performance of an Evaluation |

- | | |
|----------|--|
| TSTF 258 | Changes to Section 5.0, Administrative Controls |
| TSTF 278 | Battery Cell Parameters (LCO 3.8.6) Includes More Than Table 3.8.6-1 Limits |
| TSTF 279 | Remove the words "Including Applicable Supports" From the description of the Inservice Testing Program |

On December 13, 2000, the NRC published in the *Federal Register* notice of consideration of issuance of the requested amendment and a proposed no significant hazards consideration determination, 65 FR 77920. The supplemental letter, which withdrew TSTF-153, did not provide any new information, was within the scope of the original *Federal Register* notice, and did not change the initial no significant hazards consideration determination.

2.0 BACKGROUND

The improved standard technical specifications (iSTS) were adopted at PNPP in 1996, as an industry lead plant. Since that time, the industry and the NRC staff have worked to improve the new standard specifications (NUREGs 1430 through 1434) and many generic changes have been developed. This process saves licensee and industry resources by addressing generic issues once, rather than on each plant docket, and by pre-identifying the information necessary to process the change. This improves the adoption process for generically acceptable changes.

Generic changes to the iSTS NUREGs are proposed by the NEI TSTF to the NRC. The TSTF includes representatives from the four U.S. commercial nuclear power plant Owners Groups and NEI. Generic changes are prepared and reviewed using a process that the TSTF and NRC developed to correct and improve the iSTS NUREGs. These proposed changes are assigned a number for tracking purposes, and are referred to as TSTFs (e.g., TSTF-2, TSTF-5, etc). After NRC approval, these TSTFs are available for adoption by plants.

Conformance with a TSTF is not the primary reason why a change is acceptable. Each change is reviewed against applicable regulations and guidance to ensure it meets requirements for the specific plant in question. Conformance with the TSTF simplifies this review, and adoption of the TSTF helps standardize TS across the industry.

3.0 EVALUATION

TSTF-5, Revision 1

Delete Notification, Reporting, And Restart Requirements If A Safety Limit Is Violated

TSTF-5 retains the shutdown requirements if a Safety Limit (SL) is violated but deletes notification, reporting, and restart requirements from the technical specifications (TS). The justification given in the NRC-approved TSTF-5 is that the change deletes requirements in the iSTS that are duplicative, contained in other regulations, or explicitly addressed in 10 CFR 50.36 on TS, and need not be duplicated in TS themselves.

In its application, the licensee provided the following to show that the notification, reporting, and restart requirements proposed to be deleted from the TS duplicate other regulations:

- SL 2.2.1 requires the NRC Operations Center to be notified. This is addressed by 10 CFR 50.36(c)(1)(i)(A) ("The licensee shall notify the Commission as required by §50.72..."), and by 10 CFR 50.72 "Immediate Notification Requirements for Operating Nuclear Power Reactors".
- SL 2.2.3 requires "Within 24 hours, notify the plant manager and the corporate executive responsible for overall plant nuclear safety." Deleting this 24-hour reporting time frame is acceptable since it is only reasonable to expect utility management to be promptly informed of a SL violation considering their plant has been required to shut down, and restart of the plant must be authorized by the NRC. Therefore, post-change, this item's intent would still be met. Further, this report to utility management does not meet 10 CFR 50.36 criteria for retention in the TS.
- SL 2.2.4 requires a 30-day Licensee Event Report (LER) to be submitted to the NRC, plant manager, and the corporate executive responsible for overall plant nuclear safety. Submittal of the report to the NRC is addressed by 10 CFR 50.36(c)(1)(i)(A) ("The licensee shall ... submit a LER to the Commission as required by §50.73."), and by 10 CFR 50.73 "Licensee Event Report System". "Submittal" to the plant manager and the corporate executive responsible for overall plant nuclear safety occurs as part of the LER review process since they are part of the approval chain for the LER.
- SL 2.2.5 requires that "Operation of the unit shall not be resumed until authorized by the NRC." This is addressed by 10 CFR 50.36(c)(1)(i)(A) ("Operation must not be resumed until authorized by the Commission.")

The staff finds that the TSTF is applicable to PNPP and that the proposed changes are consistent with TSTF-5. Since the proposed changes will not materially alter any licensee obligations, and are consistent with the TSTF generic model, the staff concludes that the proposed changes to SLs 2.2.1 through 2.2.5 of the TS to incorporate TSTF-5 are acceptable. The licensee also provided the changes to the Bases for SLs 2.2.1, 2.2.3, 2.2.4, and 2.2.5, and these changes are the same as those given in TSTF-5.

TSTF-32

Slow/Stuck Control Rod Separation Criteria

TSTF-32 adds a required action to LCO 3.1.3, "Control Rod Operability," to confirm that a control rod found to be stuck is properly separated from "slow" control rods.

The scram reactivity analysis assumes, among other things, that there are two "slow" control rods adjacent to one another, a third rod is stuck in the withdrawn position, and a fourth rod fails to scram during the transient/accident analysis (the single failure). However, the analysis does not assume that the original stuck control rod is adjacent to the two "slow" rods or to another "slow" rod. If this occurs, the local scram reactivity rate assumed in the analysis might not be met. Therefore, LCO 3.1.3, Required Action A.1 has been added to confirm that when a control rod is found to be stuck, it is properly separated from "slow" rods.

During the conversion to the iSTS, an additional requirement was included in PNPP LCO 3.1.4, "Control Rod Scram Times," to ensure that when slow control rods are identified, the appropriate separation is verified between the known "slow" rods and any "withdrawn stuck" control rod. This additional requirement was above and beyond the requirements in the iSTS

NUREG. However, in LCO 3.1.3, which is where the operator is directed anytime a control rod is identified as stuck (rather than slow), a similar separation verification is not included. Therefore, a new Required Action A.1 is being added to LCO 3.1.3 to confirm that when a control rod is found to be "stuck," it is properly separated from control rods known to be "slow."

The proposed changes to LCO 3.1.3 do not change any technical requirements for the plant. Rather, the proposed changes to LCO 3.1.3 make it consistent with LCO 3.1.4. Since the proposed changes reinforce requirements of the safety analysis, and are consistent with the generic TSTF, the staff concludes that the proposed changes to LCO 3.1.3 of the TSs to incorporate TSTF-32 are acceptable.

The licensee also provided the changes to the Bases for LCO 3.1.3 and these changes are consistent with those given in TSTF-32 and in NUREG-1434 dated April 1995, except that the new words for the Bases in the TSTF list three examples where the separation criteria are not met and the licensee's proposed wording lists only one. The licensee's example envelopes the three examples given in the TSTF and is more conservative than that given in the TSTF.

TSTF-38

Revise Visual Surveillance Of Batteries To Specify Inspection Is For Performance Degradation

TSTF-38 clarifies the requirements in surveillance requirement (SR) 3.8.4.3 regarding the battery visual inspection to be consistent with the intent and the present wording of the Bases for the SR. The battery visual inspection is only for items which could potentially degrade battery performance.

As stated in the Bases to SR 3.8.4.3 in NUREG-1434, the purpose of the battery visual inspection is to provide an indication of physical damage or abnormal deterioration that could potentially degrade battery performance. As a result, it is interpreted that physical damage or abnormal deterioration has to be of a type that could degrade battery performance before the SR would fail to be met. The presence of physical damage or deterioration does not necessarily represent a failure of the SR, provided an evaluation determines that the physical damage or deterioration does not affect the operability of the battery (i.e., its ability to perform its design function). Therefore, for consistency with the Bases for SR 3.8.4.3, the statement in the SR would include the phrase "that could degrade battery performance" for clarity. The Bases for the SR would also be revised to clarify the measures to be taken in the event physical damage or deterioration are discovered.

The staff finds that the TSTF is applicable to PNPP and that the proposed changes to the TS are consistent with the TSTF. Since the change is technically acceptable and conforms with the generic TSTF, the staff concludes that the proposed change to incorporate TSTF-38 is acceptable. The licensee also provided the changes to the Bases for SR 3.8.4.3 and these changes are the same as those given in TSTF-38.

TSTF-52 Revision 3

Implement 10 CFR Part 50, Appendix J, Option B

TSTF-52 Revision 3 modifies various aspects of the iSTS to reflect the requirements of Option B to 10 CFR Part 50, Appendix J. Since PNPP has previously implemented Option B to Appendix J (see Amendment No. 86 dated September 9, 1997), most of TSTF-52 has already been implemented.

One item from TSTF-52 that has not been included in the PNPP TS regards the provisions of Section 3.0 of the TS. The staff has taken the position that Section 3.0 of the TS do not apply generically to Section 5 (i.e., the Administrative Controls). However, confusion has been created because some TS within Section 5 state that the provisions of Section 3.0 do not apply (implying that it does apply generically) whereas other TS within Section 5 states that the provisions of Section 3.0 do apply.

PNPP TS 5.5.12, "Primary Containment Leakage Rate Testing Program," contains the following statement: "The provisions of SR 3.0.2 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program." (SR 3.0.2 relates to performing surveillances within 25 percent of the surveillance frequency.)

In its application, the licensee has proposed replacing the above sentence in TS 5.5.12 regarding SR 3.0.2 with the following statement from TSTF-52: "Nothing in these Technical Specifications shall be construed to modify the testing frequencies required by 10 CFR Appendix J." The staff finds the proposed change acceptable because it is consistent with the previously approved TSTF-52 and it provides clarification that TS in and of themselves cannot extend a test interval established in the regulations. The licensee has also proposed modifying the Bases for SR 3.0.2 to reflect this replacement. Since both sentences accomplish the same objective, the change is considered an administrative change which is acceptable.

TSTF-65

Use Of Generic Titles For Utility Positions

The PNPP TS already reflect generic titles in most instances. In finalizing the wording of this TSTF, one item was incorporated that is not fully reflected in the PNPP TS. This item is the use of the term "radiation protection" in lieu of "health physics."

At PNPP, the term "radiation protection" has been adopted in lieu of "health physics." Therefore, references to health physics should be revised to be consistent with plant terminology. Changing this title has no effect on plant safety, and it has no impact on the effectiveness of administrative controls over the health physics/radiation protection function. While the NRC recently (Amendment 111) approved a similar change for PNPP, several locations of the term "health physics" were not addressed. These locations include TS 5.2.1, "Onsite and Offsite Organizations," TS 5.2.2, "Unit Staff," and TS 5.7.1, "High Radiation Area."

The proposal only changes the generic term used to refer to health physics/radiation protection personnel, it provides consistency throughout the technical specifications, and it does not change the function performed by these personnel. Therefore, the proposed change is considered administrative in nature and is acceptable to the staff.

TSTF-104, Revision 0

Relocate to the Bases the Discussion of Exceptions to LCO 3.0.4

TSTF-104 removes discussion provided in LCO 3.0.4 with respect to use of exceptions, and provides the necessary discussion in the Bases.

The justification given in the NRC-approved TSTF is that the change provides consistency with LCO 3.0.3 by moving the discussion of exceptions to the LCO to the Bases. In addition, this change reduces potential confusion by revising the discussion to eliminate the repeated use of the phrase "Modes or other specified conditions in the Applicability" to increase clarity. The discussion being moved is not crucial to understanding how LCO 3.0.4 works and is appropriate Bases material.

The staff finds that the TSTF is applicable to PNPP and that the proposed changes are consistent with the TSTF. On this basis, the staff concludes that the proposed change to LCO 3.0.4 to incorporate TSTF-104 is acceptable.

The licensee also provided the change to the Bases for LCO 3.0.4 and the change is the same as that given in TSTF-104.

TSTF-106

Change to Diesel Fuel Oil Testing Program

TSTF-106 clarifies that the TS requirement for the Diesel Oil Testing Program is only applicable to new fuel, must be done within 31 days following addition of new fuel oil to the storage tanks, and is only required to be done one time. The current TS can be, and has been, misinterpreted.

TS 5.5.9.b is proposed to be revised as follows:

"Within 31 days following addition of the new fuel oil to storage tanks, verify that the properties of the new fuel oil, other than those addressed in a., above, are within limits for ASTM 2D fuel oil; and"

The requested changes are administrative, and are consistent with the changes in the approved TSTF-106. The staff concludes that this proposal is acceptable.

TSTF-118, Revision 0

Administrative Controls Program Exceptions

TSTF-118 adds a sentence to TS 5.5.9, "Diesel Fuel Oil Testing Program," that states: "The provisions of SR 3.0.2 and 3.0.3 are applicable to the Diesel Fuel Oil Testing Program testing frequencies."

SR 3.0.2 permits the surveillance to be performed within 25 percent of the surveillance interval. SR 3.0.3 permits a surveillance to be performed within 24 hours if it is discovered that the surveillance was not performed within the required frequency.

As discussed in the justification for TSTF-52, adding the statement that SR 3.0.2 and 3.0.3 are applicable to the program test frequencies will provide consistency. TS 5.5.8, "Explosive Gas and Storage Tank Radioactivity Monitoring Program," specifically states that SR 3.0.2 and 3.0.3 are applicable to the program surveillance frequencies. Therefore, the lack of applicability of these SRs to the diesel fuel oil testing program introduces confusion. Further, the applicability of SRs 3.0.2 and 3.0.3 to the program surveillance is consistent with the current licensing basis for plants.

The staff finds that the TSTF is applicable to PNPP and that the proposed changes are consistent with the TSTF. On this basis, the staff concludes that the proposed change to incorporate TSTF-118 is acceptable.

TSTF-152, Revision 0

Revise Reporting Requirements to be Consistent with 10 CFR Part 20

TSTF-152 revises TS 5.6.1, "Occupational Radiation Exposure Report," to be consistent with the changes to 10 CFR Part 20. An NRC letter, dated July 28, 1995, provided guidance regarding TS changes resulting from the rule change.

The staff finds that the TSTF is applicable to PNPP and that the proposed changes are consistent with the TSTF. The proposed changes to TS 5.6.1 are editorial in nature. On this basis, the staff concludes that the proposed changes to incorporate TSTF-152 are acceptable.

TSTF-153, Revision 0

Clarify Exception Notes to be Consistent with the Requirement Being Excepted

Several LCOs have Notes that contain exceptions to the LCOs and have wording that is inconsistent with the wording of the LCO. TSTF-153 was intended to provide consistent wording with the requirement being excepted.

Although the staff previously approved TSTF-153, the staff has requested that the TSTF improve the wording that clarifies the exceptions being taken to the LCOs. Pending development of the final wording for this item, the staff informed the licensee that approval of TSTF-153 would be deferred. Therefore, by letter dated April 23, 2001, the licensee withdrew its request for adopting TSTF-153.

TSTF-166, Revision 0

Correct Inconsistency Between LCO 3.0.6 and the SFDP Regarding Performance of an Evaluation

TSTF-166 revises LCO 3.0.6 to explicitly require an evaluation per the SFDP by deleting the phrase, "additional evaluations and limitations may be required" and replacing it with, "an evaluation shall be performed."

The TSTF identifies an inconsistency between LCO 3.0.6, the SFDP, and the LCO 3.0.6 Bases. As currently written, LCO 3.0.6 does not explicitly require an evaluation in accordance with the SFDP, rather, it states that additional evaluations may be required. Both the SFDP and the LCO 3.0.6 Bases state that upon entry into LCO 3.0.6, an evaluation shall be made to

determine if a loss of safety function exists. In addition, because LCO 3.0.6 states that the evaluation be done in accordance with the SFDP and the SFDP states that other appropriate actions may be taken, there is no need for the statement "additional evaluations and limitations may be required" in LCO 3.0.6.

The staff finds that the TSTF is applicable to PNPP and that the proposed changes are consistent with the TSTF. On this basis, the staff concludes that the proposed change to incorporate TSTF-166 is acceptable.

TSTF-258, Revision 4

Changes to Section 5.0, Administrative Controls

The requested changes for PNPP are only a portion of the changes in TSTF-258. The portions being requested are the administrative/editorial/consistency changes that are not already addressed in the PNPP TSs. TSTF changes related to Administrative Control section 5.7 "High Radiation Area," are not being requested since the changes could be considered technical in nature.

The requested changes are:

1. Delete Section 5.2.2.b, which is redundant to 10 CFR 50.54 requirements.
2. Add a new Section 5.3.2, to clarify compliance with 10 CFR 55.4 requirements.
3. Revise Section 5.5.4 to be consistent with the intent of 10 CFR Part 20:
 - a. Revise 5.5.4.g and j to clarify where dose rate limits apply at, with respect to the site boundary;
 - b. Revise 5.5.4.g to change the phrase "total body" to "whole body" for noble gas dose rate; and
 - c. Add a new paragraph below 5.5.4.j, to note that SR 3.0.2 and 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.
4. Remove unnecessary reporting requirement on lifts of safety/relief valves from Section 5.6.4

Justifications for each of the subitems listed above:

1. The requirements of 10 CFR 50.54(m)(2)(iii) and 50.54(k) adequately provide for shift manning. 50.54(m)(2)(iii) requires "When a nuclear power unit is in an operational mode other than cold shutdown or refueling, as defined by the unit's TSs, each licensee shall have a person holding a senior operator license for the nuclear power unit in the control room at all times. In addition to this senior operator, for each fueled nuclear power unit, a licensed operator or senior operator shall be present at the controls at all times." Further, 50.54(k) requires "An operator or senior operator licensed pursuant to Part 55 of this chapter shall be present at the controls at all times during the operation of the facility." The requirements in Section 5.2.2.b will be met through compliance with

these regulations, and therefore, the current requirements in 5.2.2.b are deleted from the TS.

2. Section 5.3.2 is added to ensure that there is no misunderstanding when complying with 10 CFR 55.4 requirements. The Definitions in 10 CFR 55.4 state "*Actively performing the functions of an operator or senior operator* means that an individual has a position on the shift crew that requires the individual to be licensed **as defined in the facility's technical specifications...**" (bolding is added; italics are from 10 CFR 55.4). For clarification, a sentence is added stating "For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m)."
- 3.a The changes to 5.5.4.g and j are editorial changes clarifying whether dose rates/doses from the site are measured "at or beyond" the site boundary (5.5.4.g), or just "beyond" the site boundary (5.5.4.j). The changes to 5.5.4.g are consistent with the definition of Unrestricted Area (which is the term used in 10 CFR Part 50 Appendix I). The changes to 5.5.4.j are consistent with the definition of general environment in 40 CFR 190. These wording changes are clarifications, and do not change any existing requirements or methods for measurement of dose rate/dose.
- 3.b. The PNPP TS currently use the term "total body" in item 5.5.4.g, in reference to the noble gas dose rate. The limit is based on the dosimetry of the International Commission on Radiation Protection, Committee 2: Doses from Radiation Exposures (ICRP 2) and the correct term is "whole body" as shown in NUREG - 1302 "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Boiling Water Reactors," Specification 3.11.2.1, page 46 (Note: the TSTF references NUREG-1301, which is not applicable to PNPP since NUREG -1301 is for pressurized water reactors). This wording change is a clarification, and does not change any existing requirements or methods for measurement of dose rate.
- 3.c. The NRC and the TSTF extensively debated whether the Section 3.0 provisions (such as SR 3.0.2) generically apply to the Section 5 Administrative Controls. The NRC position was that Section 3.0 does apply to Chapter 5. In a meeting on December 15, 1998, and in a letter dated June 28, 1999, from W. Beckner (NRC) to J. Davis (NEI), the staff stated "It is the staff position that SR 3.0.2 does apply to the frequencies that are explicitly stated in Section 5.0... or encompassed within a special program (i.e., "Radioactive Effluent Controls Program)...". However, the final decision was that Section 3.0 would apply selectively to Chapter 5. Based on this final agreement, Administrative Control 5.5.4 is revised to add the following sentence: "The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency." This change is an administrative clarification only, since it provides consistency with the requirements for other programs in Section 5.0, and it maintains the original intent of the NRC by applying SR 3.0.2 and SR 3.0.3 to this program.
4. The original reporting of safety/relief valve challenges is based on guidance in NUREG-0694, "TMI-Related Requirements for New Operating Licenses." The guidance of NUREG-0694 states: "All challenges to the ...safety valves should be documented in the annual report." As part of the PNPP conversion to the iSTS, this

requirement was changed from being part of the annual report to the monthly operating report (Section 5.6.4). Subsequently, NRC Generic Letter (GL) 97-02 "Revised Contents of the Monthly Operating Report" requests the submittal of less information in the monthly operating report. The GL, which identifies what needs to be reported to support the NRC Performance Indicator Program, does not identify the need to report challenges to the safety/relief valves. Also, TSTF-258, which proposed to delete the report of all challenges to the main steam safety/relief valve, was approved by NRC letter dated June 29, 1999. Based on this information, the staff finds it acceptable to delete the administrative requirement to provide a report of all challenges to safety/relief valves.

The proposed changes are consistent with TSTF-258, with the following exceptions:

- When paragraphs are deleted, the subsequent paragraphs are not re-numbered. Re-numbering leads to unnecessary procedure changes.
- Changes to Section 5.2.2.e on unit staff working hours are not necessary since Section 5.2.2.e working hour rules were revised for PNPP by Amendment 98. Therefore, these changes (including inserts A and G), are not incorporated.
- Changes to Section 5.2.2.g on shift technical advisor (STA) qualifications are not necessary since the intent of the TSTF changes are met by an existing sentence in PNPP Section 5.2.2.g which states "The STA position may be filled by an on-shift SS or SRO provided the individual meets the Commission Policy Statement on Engineering Expertise On Shift."
- The 10 CFR Part 20 dose limits in TSTF-258 Inserts C and D are already incorporated in PNPP Section 5.5.4 "Radioactive Effluent Controls Program." Therefore, these two inserts are not incorporated.
- Insert F for Section 5.7, "High Radiation Area," is not incorporated because the changes could be considered to be technical in nature, and would not be within the scope of this administrative license amendment request.

The staff's review finds that the amendment request is for administrative changes only. The portions of incorporated TSTF-258 also have a number of exceptions due to justifiable plant-specific reasons. The proposed changes are consistent with TSTF-258 and, therefore, the staff finds them acceptable.

TSTF-278, Revision 0

Battery Cell Parameters (LCO 3.8.6) Includes More Than Table 3.8.6-1 Limits

TS 3.8.6, "Battery Cell Parameters," includes parameters in both Table 3.8.6-1 and in SR 3.8.6.3. LCO 3.8.6, which states that "Battery cell parameters for the Division 1, 2, and 3 batteries shall be within the limits of Table 3.8.6.1," does not address the parameter included in SR 3.8.6.3. Therefore, TSTF-278 revises LCO 3.8.6 to require that the battery cell parameters be "within limits" rather than "within the limits of Table 3.8.6-1."

LCO 3.8.6 requires cell parameters for the DC batteries to be within the limits specified in Table 3.8.6-1 which lists the battery cell parameter requirements on the electrolyte level, float voltage,

and specific gravity. This requirement in the LCO is not inclusive of the average electrolyte temperature limit contained in SR 3.8.6.3. Therefore, the LCO does not address all the requirements on the battery cells. TSTF-278 revises LCO 3.8.6 to require that battery cell parameters be "within limits" as opposed to only referencing Table 3.8.6-1. In addition, the TSTF includes editorial changes to make references in the Required Actions consistent with Table 3.8.6-1.

The staff finds that the TSTF is applicable to PNPP and that the proposed changes are consistent with the TSTF. On this basis, the staff concludes that the proposed change to incorporate TSTF-278 is acceptable.

TSTF-279

Remove the words "including applicable supports" from the description of the Inservice Testing Program

TSTF-279 deletes the reference to "including applicable supports" from the description of the Inservice Testing (IST) Program in TS 5.5.6.

The IST Program provides controls for testing Code Class 1, 2 and 3 components. The Inservice Examination (ISE) Program addresses items such as piping welds and pipe supports. The discussion of the IST Program in Section 5.5.6 of the iSTS was revised by the NRC to include the words "including applicable supports" in February 1992, due to issues related to the relocation of the snubber LCO from the iSTS NUREGs. However, this was inappropriate since supports are addressed under the ISE Program, not the IST Program. Thus, the reference to the applicable supports in the IST Program description in Section 5.5.6 is deleted.

The staff finds that the TSTF is applicable to PNPP and that the proposed changes are consistent with the TSTF. On this basis, the staff concludes that the proposed change to TS 5.5.6 in the administrative section of the TS to incorporate TSTF-279 is acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Ohio State official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

This amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes a surveillance requirement. The staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluent that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that this amendment involves no significant hazards consideration and there has been no public comment on such finding (65 FR 77920). Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

6.0 CONCLUSION

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

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Date: May 15, 2001