

Attachment 5:

- **5.0 – Vol. 19**

ATTACHMENT 5

REVISION H
ITS CHAPTER 5.0

SUMMARY OF CHANGES TO ITS CHAPTER 5.0

Summary of Changes to ITS Chapter 5.0

Source of Change	Summary of Changes	Affected Pages
CTS Amendment 254	Deleted CTS markup p 4 of 5 and p 5 of 5. Marked remaining CTS markup p 1 of 3, 2 of 3, and 3 of 3. No changes to DOCs, NUREG markup, JFDs or retyped ITS 5.1 needed since proposed CTS change JPTS-99-002 was approved as CTS Amendment 254 without revision of proposed changes.	<u>Specification 5.1</u> CTS mark-up p 1 of 3, 2 of 3, and 3 of 3 (CTS markup pg 4 of 5 and page 5 of 5 were deleted)
CTS Amendment 254	Deleted CTS markup p 7 of 8 and p 8 of 8. Added CTS markup p 5 (for TSTF-258 R4) and marked pages 1 of 7 through 7 of 7. No changes to DOCs, NUREG markup, JFDs or retyped ITS 5.1 needed since proposed CTS change JPTS-99-002 was approved as CTS Amendment 254 without revision of proposed changes.	<u>Specification 5.2</u> CTS mark-up p 1 of 7 through 7 of 7 (CTS markup p 5 added for TSTF-258 R4, and CTS markup p 1 of 8 and 8 of 8 deleted for CTS Amendment 254)
CTS Amendment 268	Replaced CTS markup p 3 with CTS Amendment 268 page. No other changes needed since CTS Amendment 268 did not affect text associated with ITS 5.2.	<u>Specification 5.2</u> CTS mark-up p 3 of 7
CTS Amendment 270	Replaced CTS markup p 4 of 7 and p 6 of 7 with CTS pages changed by CTS Amendment 270. Revised markup of CTS markup p 4 to delete L1 change/annotation. Deleted DOC L1 and NSHC L1 since CTS Amendment 270 made the same changes addressed by DOC L1 and NSHC L1.	<u>Specification 5.2</u> CTS mark-up p 4 of 7 and 6 of 7 DOC L1 (deleted) (DOCs p 5 of 5) NSHC L1 (deleted) (NSHCs p 1 of 1)
RAI 5.2-1 TSTF-258 R4 TSTF-86	In response to RAI 5.2-1: deleted TSTF-86 and incorporated TSTF-258 R4 (which superseded TSTF-86). TSTF-258 R4 deletes requirements that duplicate 10 CFR requirements, revise details concerning working hours and clarify requirements regarding STA function. Revised CTS markup p 3, 4, and 6. Added CTS markup p 5. Deleted a portion of DOC A2 to reflect position title change addressed in TSTF-258 R4, revised DOC LA2 to be consistent with changes to working hours details addressed in TSTF-258 R4, revised DOC LA4 to reflect change regarding STA (Engineering Expertise on Shift). Revised NUREG markup: deleted NUREG 5.2.2.b, revised 5.2.2.e (ITS 5.2.2.d), and revised NUREG 5.2.2.g (ITS 5.2.2.f). Revised JFDs: revised CLB1 to reflect use of "engineering expertise on shift" in place of term "STA," added TA2 for TSTF-258 R4, and deleted TP1 (for superseded TSTF-86). Retyped ITS: revised to reflect deletion of NUREG 5.2.2.b, revised ITS 5.2.2.d and 5.2.2.f to reflect TSTF-258 R4 changes.	<u>Specification 5.2</u> CTS mark-up p 3 of 7, 4 of 7, 5 of 7, and 6 of 7 DOC A2 (DOCs p 1 of 5) DOC LA2 (DOCs p 4 of 5) DOC LA4 (DOCs p 5 of 5) ITS mark-up p 5.0-3, 5.0-4, and Insert Page 5.0-4 Retyped ITS p 5.0-3 and 5.0-4
CTS Amendment 270	Replaced CTS markup page 1 with CTS Amendment 270 page. Deleted CTS markup change annotated A2 at CTS 6.3.1 since CTS Amendment 270 made the same change. Revised NUREG markup Insert 5.3-1 at change marked X2 (deleted change marked X2) to reflect change made by CTS Amendment 270. Deleted JFD X2 as CTS Amendment 270 made same change.	<u>Specification 5.3</u> CTS mark-up p 1 of DOC A2 (deleted) (DOCs p 1 of 2) ITS mark-up p Insert Page 5.0-5 JFD X2 (deleted) (JFDs p 1 of 1)

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TSTF-258 R4	Incorporated TSTF-258 R4. TSTF adds a paragraph for clarification when actual staffing levels exceed the minimum. Revised CTS markup by adding CTS markup page 2 which contains the clarification and added associated DOC A4. Revised NUREG markup page 5.0-5 to show addition of Insert 5.3-2 on new NUREG markup Insert Page 5.0-5 and added JFD TA1 for TSTF-258 R4 changes. Revised Retyped ITS 5.3 by adding new paragraph 5.3.2.	<p><u>Specification 5.3</u></p> <p>CTS mark-up p 1 of 2 and 2 of 2</p> <p>DOC A4 (DOCs p 1 of 2)</p> <p>ITS mark-up p 5.0-5 and Insert Page 5.0-5</p> <p>JFD TA1 (JFDs p 1 of 1)</p> <p>Retyped ITS p 5.0-5</p>
CTS Amendment 254	CTS Amendment 254 did not involve a topic addressed in ITS 5.4. Revised CTS markup by deletion of page 4 and replacing page 3 with CTS Amendment 254 page. Marked CTS markup pages 1, 2, and 3 to indicate only three CTS markup pages exist.	<p><u>Specification 5.4</u></p> <p>CTS mark-up p 1 of 3, 2 of 3, 3 of 3</p>
CTS Amendment 261	Revised CTS markup by deletion of CTS page 258e marked with "see JPTS-97-007" and marked "page 10 of 25" since CTS Amendment 261 approved changes proposed in JPTS-97-007 without revision. Replaced CTS markup page "9 of 25" with CTS Amendment 261 page and marked page as "page 8 of 22." Notes: 1) CTS RETS page 1 (CTS markup page 1) was changed by CTS Amendment 261, however; CTS Amendment 268 also changed CTS RETS page 1 and therefore the changes are discussed below under CTS Amendment 268. 2) other changes also resulted in changes to the number of CTS markup pages.	<p><u>Specification 5.5</u></p> <p>CTS mark-up p 8 of 22</p>
CTS Amendment 262	Revised CTS markup by replacing CTS page 30a (marked "page 14 of 25") with CTS Amendment 262 page 30a (marked "page 12 of 22"). CTS Amendment 262 did not change any CTS text associated with ITS Section 5.5. Therefore, no other changes were necessary	<p><u>Specification 5.5</u></p> <p>CTS mark-up page 12 of 22</p>
CTS Amendment 268	Replaced CTS markup page 1 (CTS RETS page 1) with CTS Amendment 268 page (Note: CTS RETS page 1 was also revised by CTS Amendment 261 as noted above.) The changes to CTS RETS page 1 (CTS markup page 1) contained in CTS Amendment 261 and 268 did not change CTS text associated with this ITS Section, therefore the only changes necessary were the replacement of CTS markup page 1.	<p><u>Specification 5.5</u></p> <p>CTS mark-up p 1 of 22</p>
CTS Amendment 269	Replaced CTS markup pages 16, 17, and 19 of 22 with CTS Amendment 269 pages. Revised CTS markup page 20 to show CTS Insert 238-2 as "Not used" since CTS Amendment 268 made the same change thereby allowing CTS Insert 238-2 to be deleted. Added A13 to discuss addition of phrases in CTS 4.7.B.1.c (CTS markup page 16) and CTS 4.11.A.1.c (CTS markup page 19) (concerning the potential effects of painting, fire, or chemical release on filter performance) to ITS 5.5.8.c. Note that these changes involving the potential effect of painting, fires, or chemical release were also made in response to RAI 5.5-2 discussed below. Revised DOC M2 by deletion of portions that discussed changes made by CTS Amendment 269 and are therefore not needed. Revised CTS markup page 16 at CTS 4.7.B.1.c.(1) and (2), and page 19 at 4.11.A.1.c.(1) and (2), and added DOC LA4 for relocation of charcoal adsorber sample testing scheduler details. Revised CTS markup page 16 at CTS 4.7.B.1.c and CTS markup page 19 at CTS 4.11.A.1.c by deletion of reference to DOC L2 (for changing the Frequency of certain charcoal testing to 24 months) and revised DOC L2 and NSHC L2 accordingly since CTS Amendment 269 made the same change. Revised NUREG markup page 5.0-12 at 5.5.8.c to reflect CTS Amendment 269 by annotation of changes with CLB7 and added JFD CLB7	<p><u>Specification 5.5</u></p> <p>CTS mark-up p 16 of 22, 17 of 22, 19 of 22, and 20 of 22</p> <p>DOCs A13, M2, LA4, and L2 (DOCs p 4 of 13, 5 of 13, and 6 of 13, 9 of 13, and 10 of 13)</p> <p>NSHC L2 (NSHCs p 2 of 10)</p> <p>ITS mark-up p 5.0-12</p> <p>JFD CLB7 (JFDs p 2 of 5)</p>

Summary of Changes to ITS Chapter 5.0

CTS Amendment 270	Deleted CTS RETS page 32 and 33 from the CTS markup, replaced CTS markup page 22 (CTS page 258f) with CTS Amendment 270 page, and revised CTS markup page 22 (CTS page 258f) to show additions that had been on deleted markup pages CTS RETS pages 32 and 33. Revised DOC A10 to limit discussion to CTS RETS 2.5, Maximum Activity in Outside Tanks, since portions of DOC A10 that addressed CTS RETS 3.7, Offgas Treatment System Explosive Gas Mixture Instrumentation, was addressed in CTS Amendment 270. Revised DOC L6 by deletion of reference to CTS RETS 3.7 since CTS RETS 3.7 was addressed in CTS Amendment 270. Revised NUREG markup page 5.0-14 left margin annotation at ITS 5.5.9.a to show that CTS 6.22 addresses same topic.	<u>Specification 5.5</u> CTS mark-up p 22 of 22 DOCs A10 and L6 (DOCs p 2 of 13, 3 of 13, and 12 of 13) ITS mark-up p 5.0-14
TSTF-52, R3 RAI 5.5-1	TSTF-52, R3 was incorporated into ITS 5.5 (in response to RAI 5.5-1). Revised CTS markup of Primary Containment Leakage Rate Testing Program to make consistent with TSTF on CTS page 258e and revised DOC A5 to note that the changes discussed are consistent with the TSTF. Revised NUREG 5.5.6 markup and Insert 5.5.6-1 to make consistent with TSTF by adding paragraph 5.5.6.e. to NUREG markup. Added JFD TA3 to JFDs for TSTF and added ITS 5.5.6.e.	<u>Specification 5.5</u> CTS mark-up p 8 of 22 DOC A15 (DOCs p 1 of 13) ITS mark-up p 5.0-10 and Insert page 5.0-10-2 JFD TA3 (JFDs p 3 of 5) Retyped ITS p 5.0-12
TSTF-76, R1	TSTF-76, R1 was incorporated into ITS 5.5. CTS markup of 6.17.C.2 was revised with regard to PORC review and approval of ODCM changes (as shown in CTS 6.0 markup). Revised NUREG markup of 5.5.1.c.1.(b)	<u>Specification 5.5</u> CTS mark-up p 4 of 22 ITS mark-up p 5.0-7 JFD TA11 (JFDs p 4 of 5)
TSTF-118, R0	TSTF-118, R0 was incorporated into ITS 5.5. NUREG markup was changed at 5.5.10 by changing annotation of changes that add SR 3.0.2 and 3.0.3 applicability from X5 to TA4. (No change to the markup was necessary except for annotation of the change) Replaced JFD X5 with JFD TA4.	<u>Specification 5.5</u> ITS mark-up p 5.0-15 JFDs TA4 and X5 (JFDs p 3 of 5 and p 5 of 5)
TSTF-258, R4	TSTF-258, R4 was incorporated into ITS 5.5. Revised NUREG 5.5.4.b.markup (Insert 5.5.4-1) and NUREG 5.5.4.g. markup (Insert 5.5.4-2) to reflect revised 10 CFR 20 and annotated changes with TA5. Revised NUREG 5.5.4.j by changing annotation of changes from X1 to TA5 to reflect revised 10 CFR 20. Added SR 3.0.2 and SR 3.0.3 applicability to NUREG 5.5.4 (Insert 5.5.4-4) for clarification and marked changes with TA5. Revised retyped ITS 5.5.4.b and 5.5.4.g, added SR 3.0.2 and 3.0.3 applicability.	<u>Specification 5.5</u> ITS mark-up p 5.0-9, Insert page 5.0-9, 5.0-10, Insert page 5.0-10-1 JFDs TA5 and X1 (deleted) (JFDs p 3 of 5 and p 5 of 5) Retyped ITS p 5.0-9 and 5.0-10
TSTF-273, R2 WOG-ED-23	TSTF-273, R2 (including editorial changes contained in WOG-ED-23) was incorporated into ITS 5.5. Revised NUREG 5.5.12 to reflect TSTF, added NUREG markup Insert 5.5.12-1, marked changes with TA6, and added JFD TA6. Revised retyped ITS 5.5.12 for same changes.	<u>Specification 5.5</u> ITS mark-up p 5.0-16, Insert page 5.0-16, and 5.0-17 JFD TA6 (JFDs p 4 of 5) Retyped ITS p 5.0-18 and 5.0-19
TSTF-279, R0	TSTF-279, R0 was incorporated into ITS 5.5. Since the current licensing basis and the TSTF are identical with respect to "applicable supports" referred to in the TSTF, the only change necessary was annotation of the NUREG markup to indicate TSTF applicability. added TA7 annotation to NUREG markup at 5.5.7, revised JFD CLB2 by noting the changes are consistent with the TSTF, and added JFD TA7.	<u>Specification 5.5</u> ITS mark-up p 5.0-11 JFDs CLB2 and TA7 (JFDs p 1 of 4 and p 4 of 5)

Summary of Changes to ITS Chapter 5.0

TSTF-299, R0	TSTF-299, R0 was incorporated into ITS 5.5. Revised DOC L5 to note that addition of ITS SR 3.0.2 and SR 3.0.3 applicability to ITS 5.5.2 is consistent with the TSTF. Revised NUREG 5.5.2 markup by adding annotation TA12 to changes marked X2 and revised JFD X2 to note that the changes are consistent with TSTF-299, R0.	<u>Specification 5.5</u> DOC L5 (DOCs p 12 of 13) ITS mark-up p 5.0-8 JFD TA12 and X2 (JFDs p 4 of 5)
TSTF-308, R1	TSTF-308, R1 was incorporated into ITS 5.5. Revised NUREG 5.5.4.e markup to be consistent with TSTF and added Insert 5.5.4-3. Added JFD TA10 for TSTF. Revised retyped ITS 5.5.4.e to be consistent with TSTF.	<u>Specification 5.5</u> ITS mark-up p 5.0-9 and Insert Page 5.0-9 JFD TA10 (JFDs p 4 of 5) Retyped ITS p 5.0-9
TSTF-362, R0	TSTF-362, R0 was incorporated into ITS 5.5. (Changes contained in TSTF-362 were previously incorporated and were designated PA9 and X6. Added reference to TSTF by annotating same changes with TA8.) Revised NUREG 5.5.8.a, 5.5.8.b, and 5.5.8.c markup. Revised JFDs PA9 and X2 to note that the changes are also consistent with the TSTF. Added JFD TA8 for the TSTF.	<u>Specification 5.5</u> ITS mark-up p 5.0-12 and Insert Page 5.0-12 JFDs PA9, TA8, and X6 (JFDs p 4 of 5, 4 of 5, and 5 of 5)
TSTF-364, R0	TSTF-364, R0 was incorporated into ITS 5.5. Revised NUREG 5.5.11 markup to reflect TSTF and annotated changes with TA9. Added JFD TA9 for TSTF. Revised retyped ITS 5.5.11 to reflect TSTF.	<u>Specification 5.5</u> ITS mark-up p 5.0-15 JFD TA9 (JFDs p 4 of 5) Retyped ITS p 5.0-17
RAI 5.5-2 (as modified)	Revised as discussed in RAI response. Revised CTS markup at CTS 4.7.B.1.b by deleting term "significant" and adding the same phrase used in CTS 4.7.B.1.c and CTS 4.11.A.2 regarding the potential adverse effects of painting, fire or chemical release. Revised CTS Inserts 238-1 and 238-3. Added DOC A13 to fully discuss retention of phrase concerning the adverse effects of painting, etc and revised DOC M2. Revised NUREG markup at Insert 5.5.8-1 and revised retyped ITS 5.5.8 to reflect changes to CTS markup.	<u>Specification 5.5</u> CTS mark-up p 16 of 22, 19 of 22, and 20 of 22 DOCs A13 and M2 (DOCs p 4 of 13 and p 5 of 13) ITS mark-up Insert page 5.5-11 Retyped ITS p 5.0-13
RAI 5.5-3 (as modified)	Revised to address reviewer comments. Revised CTS markup at 4.7.B.1.c and 4.11.A.2 by deletion of reference to HEPA filter. Revised CTS insert 238-1 and added CTS Insert 238-3 (to address HEPA and charcoal adsorber testing in separate inserts for clarification of changes). Revised DOC M2 to reflect changes in CTS inserts 238-1 and 238-3. Revised NUREG markup Insert 5.5.8-1 to reflect deletion of HEPA filters discussed in RAI and addition of discussion regarding testing following removal of a charcoal sample. Revised Retyped ITS to reflect changes to NUREG markup.	<u>Specification 5.5</u> CTS mark-up p 16 of 22, 19 of 22, and 20 of 22 DOC M2 (DOCs p 5 of 13 and 6 of 13) ITS mark-up Insert Page 5.0-11 Retyped ITS p 5.0-13
RAI 5.5-4 (as modified)	Revised to address reviewer comments. Revised NUREG markup at 5.5.8.a and 5.5.8.b by indicating the appropriate version of the ASME standard (N510-1980 as discussed in JFD CLB9). Annotated change as CLB9 and added JFD CLB9. Revised retyped ITS at 5.5.8.a and 5.5.8.b to reflect changes to NUREG markup.	<u>Specification 5.5</u> ITS mark-up p 5.0-12 JFD CLB9 (JFDs p 2 of 5) Retyped ITS p 5.0-14

Summary of Changes to ITS Chapter 5.0

RAI 5.5-7 (as modified)	Revised to address reviewer comments. Revised CTS markup at CTS RETS 2.5 to more clearly show conversion of the current 10 curies limit in unprotected tanks and the relationship of that limit to (old) 10 CFR 20. Revised DOC A10 to provide additional discussion of 10 CFR 20 and the 10 curie limit and to note that conversion of CTS RETS 2.5 to ITS 5.5.9.b presents the limits in terms of revised (new) 10 CFR 20 by use of the same terminology and values as presented in TSTF-258. R4 changes to ITS 5.5.4.b. Revised NUREG 5.5.9.c (ITS 5.5.9.b) markup to express radioactivity quantity limits for unprotected tanks in terms consistent with ITS 5.5.4.b effluent release limits (as modified by TSTF-258, R4) and annotated changes with X8. Added JFD X8. Revised retyped ITS 5.5.9.b to reflect change to NUREG markup.	<u>Specification 5.5</u> CTS mark-up p 21 of 22 DOC A10 (DOCs p 3 of 13) ITS mark-up p 5.0-14 JFD X8 (JFDs p 5 of 5) Retyped ITS p 5.0-16
New change	Revised NUREG markup at 5.5.10.c and in Insert 5.5.10-2 to address use of a larger membrane filter for diesel fuel particulate concentration testing than is specified in ASTM 5452-1996. (Changes are marked "editorial" in margin of affected pages.) Added JFD X7 to address the change. Revised ITS 5.5.10.c to reflect changes to NUREG markup.	<u>Specification 5.5</u> ITS mark-up p 5.0-15 and Insert page 5.0-15 JFD X7 (JFDs p 5 of 5) Retyped ITS p 5.0-17
Editorial	Corrected typographic error - changed "This document ash" to "This document shall" on CTS page 258c. Corrected markup error - replaced an additional CTS phrase "Action Statement" with ITS term "Condition(s)" on CTS page 258f. Changed format of DOC A5 to more clearly present two different changes discussed in the DOC and added "ITS" three places for clarity. Revised NUREG markup at 5.5.4.b by adding the phrase "from the site" in conjunction with replacing Insert 5.5.4-1 with the exact word from TSTF-258, R4 (the resulting wording is unchanged - part is now editorial and part is per the TSTF). Revised NUREG markup at 5.5.4.c (and ITS 5.5.4.c) by removing markup phrase "pursuant to" and restoring NUREG phrase "in accordance with" Changed annotation of NUREG 5.5.4.i markup from X1 to PA1 (since X1 was deleted as part of adopting TSTF-258, R4)	<u>Specification 5.5</u> CTS mark-up p 4 of 22 and 22 of 22 DOC A5 (DOCs p 1 of 13) ITS mark-up p 5.0-9 and 5.0-10 Retyped ITS p 5.0-9 and 5.0-10
New change	Revised NUREG 5.5.8.d markup to reflect current licensing basis that does not include the prefilters in the pressure drop testing and marked change CLB8. (Margin is marked with "editorial") Revised retyped ITS to reflect NUREG markup change.	<u>Specification 5.5</u> ITS mark-up p 5.0-13 JFD CLB8 (JFDs p 2 of 5) Retyped ITS p 5.0-15
CTS Amendment 254	Deleted CTS markup page 10 marked "see JPTS-99-002" and replaced CTS RETS page 66 with Amendment 254 page. No other changes necessary since changes proposed in JPTS-99-002 were approved as submitted.	<u>Specification 5.6</u> CTS mark-up p 6 of 9
CTS Amendment 266	Replaced CTS markup page 254c with Amendment 266 page and remarked. Changes due to Amendment 266 had no effect on ITS since the changes involved were deleted by adoption of TSTF-363, R0.	<u>Specification 5.6</u> CTS mark-up p 7 of 9
CTS Amendment 268	Replace CTS RETS page 67 with CTS Amendment 268 page and remarked page. Amendment 268 changes had no effect on ITS since revised CTS text concerns a topic that is to be relocated to ODCM.	<u>Specification 5.6</u> CTS mark-up p 6 of 9
TSTF-37, R2	Adopted TSTF. Revised NUREG 5.6.7 markup by addition of annotation TA1 to existing CLB2 annotation since the change in the TSTF are identical to those marked CLB2. Added JFD TA1.	<u>Specification 5.6</u> ITS mark-up p 5.0-22 JFD TA1 (JFDs p 1 of 2)

Summary of Changes to ITS Chapter 5.0

TSTF-152, R0	Adopted TSTF. Revised DOC A3 to note that changes discussed are consistent with TSTF. Revised NUREG 5.6.1 markup and markup Insert 5.6.1-1 to reflect changes in TSTF. Revised NUREG 5.6.3 markup per TSTF to make consistent with revised 10 CFR 50.36a and revised 10 CFR 20 and marked the changes with TA2 (in addition to existing X1). Added JFD TA2 for TSTF and revised JFD X1 to note that changes are consistent with TSTF. Revised retyped ITS 5.6.1 and ITS 5.6.3 to reflect NUREG markup changes.	<u>Specification 5.6</u> DOC A3 (DOCs p 1 of 5) ITS mark-up p 5.0-18. Insert Page 5.0-18. and 5.0-19 JFD TA2 (JFDs p 2 of 2) Retyped ITS p 5.0-20 and 5.0-21
TSTF-258, R4	Adopted TSTF. Revised NUREG 5.6.4 markup by deleting SRV reporting requirements as part of the monthly report and marked change with TA3 for TSTF. Added JFD TA3 for TSTF. Revised retyped ITS 5.6.4 to reflect NUREG markup changes.	<u>Specification 5.6</u> ITS mark-up p 5.0-19 and 5.0-20 JFD TA3 (JFDs p 2 of 2) Retyped ITS p 5.0-20
TSTF-348, R0	Adopted TSTF. Revised NUREG 5.6.2 by deletion of requirements regarding collocated TLDs per TSTF and marked change with TA4 (in addition to existing CLB1). Revised CLB1 to note changes discussed are consistent with TSTF and added JFD TA4 for TSTF.	<u>Specification 5.6</u> ITS mark-up p 5.0-19 JFDs CLB1 and TA4 (JFDs p 1 of 2 and 2 of 2)
TSTF-363, R0	Adopted TSTF. Revised CTS 6.9.A.4.b to reflect deletion of topical report date, revision, etc. details and marked change with A11. Added DOC A11 to discuss changes and noted changes are consistent with TSTF and 12/15/99 NRC letter. Revised NUREG markup at 5.6.5.b and Insert 5.6.5-2 consistent with TSTF and 12/15/99 NRC letter and marked changes TA5. Added JFD TA5 for TSTF. Revised retyped ITS to reflect NUREG markup changes.	<u>Specification 5.6</u> CTS mark-up p 7 of 9 DOC A11 (DOCs p 2 of 5) ITS mark-up p 5.0-20 and Insert Page 5.0-20 JFD TA5 (JFDs p 2 of 2) Retyped ITS p 5.0-22
RAI 5.6-1 (as modified)	Revised to reflect reviewer comments. Revised CTS page 254d markup to show deletion of COLR distribution details that duplicate 10 CFR 50.4 requirements and marked changes with A10. Added DOC A10	<u>Specification 5.6</u> CTS mark-up p 8 of 9 DOC A10 (DOCs p 2 of 5)
Editorial	Revised JFD CLB1 by changing "CTS 7.3.d" to CTS RETS 7.3.d" for clarification.	<u>Specification 5.6</u> JFD CLB1 (JFDs p 1 of 2)
CTS Amendment 270	Replace CTS page 256 with CTS Amendment 270 page and remarked page. No changes to DOCs, JFDs, etc. necessary since the revised CTS text is replaced as discussed in DOC L1.	<u>Specification 5.7</u> CTS mark-up p 2 of 2
TSTF-258, R4 RAI 5.7-1 (as modified)	Adopted TSTF as discussed in RAI response. Revised Insert 5.7 by adopting insert provided in TSTF and carried over changes marked PA1 and PA2 from previous Insert 5.7 without any change. Added JFD TA2 for TSTF-258, R4 and deleted JFD X1 (since the TSTF replaced the changes discussed in JFD X1). Deleted JFD TA1 (for TSTF-65, R1) since the changes in TSTF-65 that are applicable to ITS 5.7 are contained in the TSTF-258, R4 insert changes. (A new change was also made to the TSTF-258, R4 insert and is discussed below)	<u>Specification 5.7</u> ITS mark-up p Insert Page 5.0-24 (1 of 4 through 4 of 4) JFDs TA1, TA2, and X1 (JFDs p 1 of 1)
New change	Revise NUREG markup Insert 5.7 at 5.7.1.a and 5.7.2.a to make provision for continuous guarding of a high radiation area entrance or access point (in lieu of a barricade, locked door, etc.) to address potential events such as broken locks, discovery of a new high radiation area, etc., and added DOC PA3 to discuss the changes.	<u>Specification 5.7</u> ITS mark-up p Insert Page 5.0-24 (1 of 4 and 3 of 4) JFD PA3 (JFDs p 1 of 1)

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Editorial	Revised NUREG markup Insert 5.7: at 5.7.1 title and 5.7.2 title (corrected usage of uppercase letters). and at 5.7.1.c and 5.7.2.c deleted word "that" to be consistent with the ITS Writers Guide. Marked the editorial changes PA2.	<u>Specification 5.7</u> ITS mark-up p Insert Page 5.0-24 (1 of 4 and 2 of 4)
TSTF-76, R1	Adopted TSTF. Revised CTS markup to show relocation of requirements for PORC review and approval of ODCM changes, to the QA Manual and added DOC LA7 containing justification.	<u>Specification CTS 6.0</u> CTS mark-up p 17 of 22 DOC LA7 (DOCs p 4 of 4)

ITS CONVERSION PACKAGE

CHAPTER 5.0 - ADMINISTRATIVE CONTROLS

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.1

Responsibility

**MARKUP OF CURRENT TECHNICAL SPECIFICATIONS
(CTS)**

DISCUSSION OF CHANGES (DOCs) TO THE CTS

**NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC)
FOR LESS RESTRICTIVE CHANGES**

MARKUP OF NUREG-1433, REVISION 1, SPECIFICATION

**JUSTIFICATION FOR DIFFERENCES (JFDs) FROM
NUREG-1433, REVISION 1**

**RETYPE PROPOSED IMPROVED TECHNICAL
SPECIFICATIONS (ITS)**

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.1

Responsibility

MARKUP OF CURRENT TECHNICAL
SPECIFICATIONS (CTS)

[5.0] 6.0

ADMINISTRATIVE CONTROLS

A2

Administrative Controls are the means by which plant operations are subject to management control. Measures specified in this section provide for the assignment of responsibilities, plant organization, staffing qualifications and related requirements, review and audit mechanisms, procedural controls and reporting requirements. Each of these measures are necessary to ensure safe and efficient facility operation

[5.1] 6.1

RESPONSIBILITY

Plant manager

overall

A4

[5.1.1]

The Site Executive Officer is responsible for safe operation of the plant and shall delegate in writing the succession to this responsibility during his absence.

M2

← CTS INSERT add 5.1.1

← CTS INSERT add 5.1.2

6.2 ORGANIZATION

6.2.1 Facility Management and Technical Support

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

M3

1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Updated FSAR.
2. The Site Executive Officer shall be responsible for overall plant operation, and shall have control over those onsite activities that are necessary for safe operation and maintenance of the plant.
3. The Chief Nuclear Officer 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.
4. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 Plant Staff

The plant staff organization shall be as follows:

1. Each shift crew shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;

See ITS section 5.2

CTS Amend 254

M2

CTS INSERT add 5.1.1

The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment, and modification to systems or equipment that affect nuclear safety.

M3

CTS INSERT add 5.1.2

5.1.2

The shift supervisor (SS) shall be responsible for the control room command function. During any absence of the SS from the control room while the plant is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the SS from the control room while the plant is in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

HST Amend 254
CTS

A1

7.0 ADMINISTRATIVE CONTROLS

5.17

7.1 RESPONSIBILITY

plant A3

5.1.1.2-

and shall

in writing the succession to

The Resident Manager shall have ~~full~~ responsibility for ~~the safe and efficient~~ operation of the ~~plant~~ ~~which is conducted in such a manner as to provide continuous protection to the environment.~~ During periods when the Resident Manager is unavailable, one of the three General Managers will assume this responsibility. In the event all four are unavailable, the Resident Manager may delegate this responsibility to other qualified supervisory personnel.

M1

during Air Assistance

b. Implementation of the Radiological Effluent Technical Specifications is the responsibility of the General Manager - Operations, with the assistance of the plant staff organization.

See ITS: Section 5.2

7.2 PROCEDURES

Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 9 "Facility Administrative Policies and Procedures" of ANSI 18.7-1972 and Regulatory Guide 1.33, November 1972, Appendix A. In addition, procedures shall be established, implemented and maintained for the PCP, ODCM, and Quality Control Program for effluent and environmental monitoring using the guidance in Regulatory Guide 4.1, Revision 1.

See ITS: Section 5.4

7.3 REPORTING REQUIREMENTS

a. Planned Liquid and Gaseous Releases

The limits for radioactive materials contained in liquid and gaseous effluents are contained in Specifications 2.3, 3.3 and 3.4.

See ITS: Section 5.6

b. Environmental Samples Exceeding Limits of Table 6.1-2

When the limits of Table 6.1-2 are exceeded, refer to Specification 6.1.b for reporting requirements.

c. Semiannual Radioactive Effluent Release Report

Routine Radioactive Effluent Release Reports covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The period of the first report shall begin with the date of initial criticality.

1. The Radioactive Effluent Release Report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit using as guidance Regulatory Guide 1.21, Revision 1, June 1974, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants", with data summarized on a quarterly basis following the format of Appendix B thereof.

CTS Amend 254

Amendment No. 254

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.1

Responsibility

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
ITS: 5.1 - RESPONSIBILITY

ADMINISTRATIVE CHANGES

- A1 In the conversion of the James A. FitzPatrick Nuclear Power Plant (JAFNPP) Current Technical Specifications (CTS) to the proposed plant specific Improved Technical Specifications (ITS) certain wording preferences or conventions are adopted which do not result in technical changes. Editorial changes, reformatting, and revised numbering are adopted to make ITS consistent with the conventions in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4", Revision 1 (i.e., Improved Standard Technical Specifications (ISTS)).
- A2 The details of CTS 6.0, "Administrative Controls," which describe the content and use of the succeeding Specifications are being deleted. The Administrative Controls are adequately covered by the subsequent ITS Specifications which are retained. Since this change does not modify any technical requirements, it is administrative and has no adverse impact on safety.
- A3 CTS 6.1, Site Executive Officer and CTS RETS 7.1.a, Resident Manager, titles are revised in ITS 5.1, by replacing plant specific management titles with generic titles as generally provided in ANSI N18.1-1971. Personnel who fulfill these positions are still required to meet the qualification requirements detailed in ITS 5.3. In addition, compliance details relating to the plant specific management position titles fulfilling the duties of these generic positions will continue to be defined, established, documented and updated in accordance with ITS 5.2.1.a. This approach is consistent with Traveler TSTF-65, and the letter from C.I. Grimes to the four Owners Groups, dated November 10, 1994. Since this change does not eliminate any of the qualifications, responsibilities or requirements for these personnel or the positions, it is administrative and has no adverse impact on safety.
- A4 CTS 6.1, statement that the Site Executive Officer is responsible for safe operation of the plant, is revised. ITS 5.1 states that the plant manager (A3) shall be responsible for overall plant operation, and establishes the requirement to designate, in writing, a successor. The responsibility of the plant manager for the safe operation of the plant is retained in ITS 5.2, Onsite and Offsite Organizations (ITS 5.2.1.b). This change, does not reduce or eliminate any plant manager responsibilities, is a presentation preference consistent with NUREG-1433, Revision 1, and is considered administrative. This change has no impact on safety.

TECHNICAL CHANGES - MORE RESTRICTIVE

- M1 Not Used.

DISCUSSION OF CHANGES
ITS: 5.1 - RESPONSIBILITY

TECHNICAL CHANGES - MORE RESTRICTIVE

- M2 CTS 6.1, for Site Executive Officer responsibilities, is supplemented. ITS 5.1.1 adds the requirement that the plant manager (A3) or his designee approve each proposed test, experiment, and modification to systems or equipment that affect nuclear safety prior to implementation. Since no similar Specification exists, this change is more restrictive. This change adds a requirement for approval by the authority responsible for overall safe operation of the plant, and therefore has no adverse impact on safety.
- M3 ITS 5.1.2 has been added to require that the shift supervisor be responsible for the control room command function, and that in the absence of the shift supervisor from the control room, an individual with an active SRO license be designated to assume the control room command function when the plant is in MODE 1, 2, or 3. An individual with an active SRO license or RO license can be designated to assume the control room command function when the plant is in MODE 4 or 5. Since no similar specification exists, this change is more restrictive. This change identifies the shift crew position that is in command, and therefore has no adverse impact on safety.

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

None

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.1

Responsibility

NO SIGNIFICANT HAZARDS CONSIDERATION
(NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATION
ITS: 5.1 - RESPONSIBILITY

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.1

Responsibility

MARKUP OF NUREG-1433, REVISION 1
SPECIFICATION

5.0 ADMINISTRATIVE CONTROLS

CTS

5.1 Responsibility

[6.1]

5.1.1

The ~~Plant Superintendent~~ shall be responsible for overall operation and shall delegate in writing the succession to this responsibility during his absence.

manager

[Doc M1]

TAI

The ~~Plant Superintendent~~ or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.

PAZ

[Doc M2]

5.1.2

The ~~Shift Supervisor (SS)~~ shall be responsible for the control room command function. During any absence of the ~~SS~~ from the control room while the ~~URD~~ is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the ~~SS~~ from the control room while the ~~URD~~ is in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

X1

plant

PA1

BWR/4 STS
JAFNPP

Rev 1, 04/07/95
Amendment No.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.1

Responsibility

JUSTIFICATION FOR DIFFERENCES (JFDs)
FROM NUREG-1433, REVISION 1

JUSTIFICATION FOR DIFFERENCES FROM NUREG-1433, REVISION 1
ITS: 5.1 - RESPONSIBILITY

RETENTION OF EXISTING REQUIREMENT (CLB)

None

PLANT SPECIFIC WORDING PREFERENCE OR MINOR EDITORIAL IMPROVEMENT (PA)

- PA1 Wording preference: the term, "unit," is replaced with the term, "plant."
- PA2 Editorial changes have been made for enhanced clarity or to correct a grammatical/typographical error.

PLANT SPECIFIC DIFFERENCE IN DESIGN OR DESIGN BASIS (DB)

None

DIFFERENCE BASED ON APPROVED TRAVELER (TA)

- TA1 The changes presented in Technical Specification Task Force (TSTF) Technical Specification Change Traveler number 65, Revision 1, have been incorporated into the revised Improved Technical Specifications.

DIFFERENCE BASED ON PENDING TRAVELER (TP)

None

DIFFERENCE FOR OTHER REASONS THAN ABOVE (X)

- X1 ITS 5.1.2 bracketed information has been revised consistent with changes to CTS 6.1 regarding management titles (A3) and control room responsibilities (M3).

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.1

Responsibility

RETYPE PROPOSED IMPROVED TECHNICAL
SPECIFICATIONS (ITS)

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

- 5.1.1 The plant manager shall be responsible for overall plant operation and shall delegate in writing the succession to this responsibility during his absence.

The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment, and modification to systems or equipment that affect nuclear safety.

- 5.1.2 The shift supervisor (SS) shall be responsible for the control room command function. During any absence of the SS from the control room while the plant is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the SS from the control room while the plant is in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.
-
-

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.2

Organization

**MARKUP OF CURRENT TECHNICAL SPECIFICATIONS
(CTS)**

DISCUSSION OF CHANGES (DOCs) TO THE CTS

**NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC)
FOR LESS RESTRICTIVE CHANGES**

MARKUP OF NUREG-1433, REVISION 1, SPECIFICATION

**JUSTIFICATION FOR DIFFERENCES (JFDs) FROM
NUREG-1433, REVISION 1**

**RETYPE PROPOSED IMPROVED TECHNICAL
SPECIFICATIONS (ITS)**

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.2

Organization

MARKUP OF CURRENT TECHNICAL
SPECIFICATIONS (CTS)

A1

ITS

JAFNPP

see ITS Section 5.1

6.0 ADMINISTRATIVE CONTROLS

Administrative Controls are the means by which plant operations are subject to management control. Measures specified in this section provide for the assignment of responsibilities, plant organization, staffing qualifications and related requirements, review and audit mechanisms, procedural controls and reporting requirements. Each of these measures are necessary to ensure safe and efficient facility operation.

6.1 RESPONSIBILITY

The Site Executive Officer is responsible for safe operation of the plant and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

[5.2.1] 6.2.1 Facility Management and Technical Support

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

[5.2.1.a]

1. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of department responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Updated FSAR.

Quality Assurance Program

Plant manager

A4
SAFE

INSERT 247-2

A2

[5.2.1.b]

2. The Site Executive Officer shall be responsible for overall plant operation, and shall have control over those onsite activities that are necessary for safe operation and maintenance of the plant.

shall have corporate responsibility for overall plant nuclear safety and

A3

[5.2.1.c]

3. The Chief Nuclear Officer 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.

A2

[5.2.1.d]

4. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

radiation protection

A2

[5.2.2] 6.2.2 Plant Staff

The plant staff organization shall be as follows:

1. Each shift crew shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;

CTS Amend 254

CTS INSERT 247-2

A2

. including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications.

CTS Amend 254

A1

Table 6.2-1
 ENERGY NUCLEAR OPERATIONS, INC.
 JAMES A. FITZPATRICK NUCLEAR POWER PLANT
 MINIMUM SHIFT MANNING REQUIREMENTS

	Refuel & Cold Shutdown (fuel in reactor)	Start-up, Shutdown or Run
LA4 - SRO	1 on site	2 (1 in C. R.)
[5.2.2.f] - STA	None	1 on site* A5
LA4 - RO	1 in C. R.	2 (1 in C. R.)**
[5.2.2.a] - Non-Licensed Operator	1 on site	2 on site
[5.2.2.c] - Individual Qualified in Radiation Protection Procedures	1 on site A2 radiation protection technician	1 on site A5

TSTF-258, R-4

Note: * The STA position may be combined with one of the SRO positions and fulfilled by any individual meeting the dual-role SRO/STA qualification in accordance with Section 5.3.2.

** During startup or planned shutdown; both in Control Room.

- (SRO) - Licensed Senior Operator
- (STA) - Shift Technical Advisor
- (RO) - Licensed Reactor Operator
- (C.R.) - Control Room

LA1

OTS Amend 268

A1

JAFNPP

AB

2. An SRO or an SRO with a license limited to fuel handling shall directly supervise all Core Alterations. This person shall have no other duties during this time;

3. DELETED Provided immediate action is taken to restore shift composition to minimum requirements

CTS Amend 270

TSTF-258, R4

[5.2.2.b]
[5.2.2.c]
[5.2.2.e]
[5.2.2.d]

In the event of illness or unexpected absence, up to two (2) hours is allowed to restore the shift crew to the minimum complement

A7

A2

The Operations Manager or Assistant Operations Manager, Shift Manager and Control Room Supervisor shall hold an SRO license and the Senior Nuclear Operator and the Nuclear Control Operator shall hold an RO license or an SRO license

licensed

Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions: (e.g., senior reactor operators, health physicists, auxiliary operators, and maintenance personnel who are working on safety-related systems, radiation protection technicians)

(SROs, licensed Reactor Operators (ROs))

A2
LA2

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8 to 12 hours a day, nominal 40-hour week, while the plant is operating.

However, in the event that unforeseen problems require substantial amounts of overtime to be used or during extended periods of shutdown for refueling, major maintenance or major modifications, on a temporary basis, the following guidelines shall be followed:

LA2

- a. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- b. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 168-hour period, all excluding shift turnover time.
- c. A break of at least eight hours should be allowed between work periods, shift turnover time can be included in the breaktime.
- d. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

INSERT 247a-1

Any deviation from the above guidelines shall be authorized by the Site Executive Officer or the General Manager - Operations, or 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 individual overtime shall be reviewed monthly by the Site Executive Officer or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

TSTF-258, R4

LA2

be
shall
approved

INSERT 247a-2

working hour
A2

Plant manager or plant manager's designee

CTS Amend 270

CTS INSERT 247a-1

LA2

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.

CTS INSERT 247a-2

LA2

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.

TSTF-258, R4

CTS Amend 254, 270

An individual shall provide advisory technical support to the SS in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual

JAFNPP

A1

A8

See ITS Section 5.3

TSTF-258, R4

6.3 PLANT STAFF QUALIFICATIONS

6.3.1 The minimum qualifications with regard to educational background and experience for plant staff positions shown in FSAR Figure 13.2-7 shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions; except for the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

6.3.2 ~~The Shift Technical Advisor (STA) shall meet or exceed the minimum requirements of either Option 1 (Combined SRO/STA Position) or Option 2 (Continued use of STA Position), as defined in the Commission Policy Statement on Engineering Expertise on Shift, published in the October 28, 1985 Federal Register (50 FR 43621). When invoking Option 1, the STA role may be filled by the Shift Manager or Control Room Supervisor. (1)~~

[5.2.2. f]

A9

6.3.3 Any deviations will be justified to the NRC prior to an individual's filling of one of these positions.

A10

NOTE:

(1) The 13 individuals who hold SRO licenses, and have completed the FitzPatrick Advanced Technical Training Program prior to the issuance of License Amendment 111, shall be considered qualified as dual-role SRO/STAs

LA3

6.4 RETRAINING AND REPLACEMENT TRAINING

A training program shall be maintained under the direction of the Training Manager to assure overall proficiency of the plant staff organization. It shall consist of both retraining and replacement training and shall meet or exceed the minimum requirements of Section 5.5 of ANSI N18.1-1971.

The retraining program shall not exceed periods two years in length with a curriculum designed to meet or exceed the requalification requirements of 10 CFR 55.59

6.5 REVIEW AND AUDIT

See CTS Chapter 6.6

Review requirements are completed by using designated technical reviewers/qualified safety reviewer and two separate review committees. The Plant Operating Review Committee (PORC) is an onsite review group; the Safety Review Committee (SRC) is an independent offsite review and audit group.

6.5.0 REVIEW AND APPROVAL OF PROGRAMS AND PROCEDURES

6.5.0.1 The procedure review and approval process shall be controlled and implemented by administrative procedure(s).

6.5.0.2 Each program and procedure required by Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed by a minimum of two designated technical reviewers who are knowledgeable in the affected functional area.

CTS Amend 270

AI

JAFNPP

7.0 ADMINISTRATIVE CONTROLS

See ITS Section 5.1

7.1 RESPONSIBILITY

a. The Site Executive Officer shall have direct responsibility for assuring the operation of the James A. FitzPatrick Plant is conducted in such a manner as to provide continuing protection to the environment and shall delegate in writing the succession to this responsibility during his absence.

b. Implementation of the Radiological Effluent Technical Specifications is the responsibility of the General Manager - Operations, with the assistance of the plant staff organization.

LA5

7.2 PROCEDURES

See ITS Section 5.4

Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5 "Facility Administrative Policies and Procedures" of ANSI 18.7-1972 and Regulatory Guide 1.33, November 1972, Appendix A. In addition, procedures shall be established, implemented and maintained for the PCP, ODCM, and Quality Control Program for effluent and environmental monitoring using the guidance in Regulatory Guide 4.1, Revision 1.

7.3 REPORTING REQUIREMENTS

See ITS Section 5.6

a. Planned Liquid and Gaseous Releases

The limits for radioactive materials contained in liquid and gaseous effluents are contained in Specifications 2.3, 3.3 and 3.4.

b. Environmental Samples Exceeding Limits of Table 6.1-2

When the limits of Table 6.1-2 are exceeded, refer to Specification 6.1.b for reporting requirements.

c. Semiannual Radioactive Effluent Release Report

Routine Radioactive Effluent Release Reports covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The period of the first report shall begin with the date of initial criticality.

1. The Radioactive Effluent Release Report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit using as guidance Regulatory Guide 1.21, Revision 1, June 1974, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants", with data summarized on a quarterly basis following the format of Appendix B thereof.

OTS Amend 254

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.2

Organization

DISCUSSION OF CHANGES (DOCs) TO THE
CTS

DISCUSSION OF CHANGES
ITS: 5.2 - ORGANIZATION

ADMINISTRATIVE CHANGES

- A1 In the conversion of the James A. FitzPatrick Nuclear Power Plant (JAFNPP) Current Technical Specifications (CTS) to the proposed plant specific Improved Technical Specifications (ITS) certain wording preferences or conventions are adopted which do not result in technical changes. Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the conventions in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4", Revision 1 (i.e., Improved Standard Technical Specifications (ISTS)).
- A2 CTS 6.2 is revised by replacing plant specific management titles with generic titles as generally provided in ANSI N18.1-1971 and specifying the location of documentation is provided in the UFSAR/Quality Assurance Program. Personnel who fulfill these positions are still required to meet the qualification requirements detailed in ITS 5.3. In addition, compliance details relating to the plant specific management position titles fulfilling the duties of these generic positions will continue to be defined, established, documented and updated in accordance with ITS 5.2.1.a. This approach is consistent with Traveler TSTF-65, Revision 1, and the letter from C.I. Grimes (NRC) to the four Owners' Groups, dated November 10, 1994. Since this change does not eliminate any of the qualifications, responsibilities or requirements for these personnel or the positions, it is administrative and has no adverse impact on safety. The specific replacements are:
- 6.2.1.2 plant manager for Site Executive Officer
 - 6.3.2 shift supervisor (SS) for Shift Manager
 - 6.2.1.3 chief nuclear officer for Chief Nuclear Officer
 - 6.2.1.4 radiation protection for Health Physics
 - Table 6.2-1 radiation protection technician for an individual qualified in radiation protection procedures
 - 6.2.2.5 operations manager for Operations Manager
- A3 The responsibilities of the chief nuclear officer in CTS 6.2.1.3 are revised (ITS 5.2.1.c) to clarify that this individual "shall have corporate responsibility for overall plant nuclear safety." Since this change only provides clarification, it is administrative and has no adverse impact on safety.

T57F-258, R4

DISCUSSION OF CHANGES
ITS: 5.2 - ORGANIZATION

ADMINISTRATIVE CHANGES

- A4 CTS 6.2.1.2, statement that the Site Executive Officer is responsible for overall plant operation, is revised. ITS 5.2.1.b states that the plant manager (A3) shall be responsible for overall safe operation of the plant. The responsibility of the plant manager for the safe operation of the plant, as identified in CTS 6.1 (see ITS 5.1 Discussion Of Changes) is retained in ITS 5.2 Onsite and Offsite Organizations (ITS 5.2.1.b). This change, does not reduce or eliminate any plant manager responsibilities, is a presentation preference consistent with NUREG-1433, Revision 1, and is considered administrative. This change has no impact on safety.
- A5 CTS Table 6.2-1, notation that the STA be on site, and which permits the STA position to be combined with one of the SRO positions, provided the individual meets the dual role SRO/STA qualification requirements in accordance with CTS 6.3.2 are deleted. These issues are adequately addressed in the "Commission Policy Statement on Engineering Expertise on Shift," published in the October 28, 1985 Federal Register (50 FR 43621), and need not be retained in the ITS. This change, does not modify any technical requirements, is consistent with NUREG 1433, Revision 1, is considered administrative, and has no adverse impact on safety.
- A6 CTS 6.2.2.2 requires an SRO or an SRO with a license limited to fuel handling to directly supervise all CORE ALTERATIONS. This requirement is adequately addressed in 10 CFR 50.54(m)(2)(iv), and need not be repeated in the ITS. Since this change does not modify any technical requirements, it is administrative and has no adverse impact on safety.
- A7 CTS 6.2.2.5 requires that the Shift Manager and Control Room Supervisor hold an SRO license; and that the Senior Nuclear Operator and the Nuclear Control Operator hold an SRO or an RO license. Operator licensing requirements for these positions are adequately addressed in 10 CFR 50.54(1) and 10 CFR 55.2, and need not be repeated in the ITS. Since this change does not modify any technical requirements, it is administrative and has no adverse impact on safety.
- A8 CTS 6.3.2 is revised (ITS 5.5.2.f) to clarify that the STA provide advisory technical support to the shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the plant. This clarification is consistent with the guidance provided in NUREG-0737, the Commission Policy Statement on Engineering Expertise on Shift, and NRC Information Notice 93-81, to provide engineering and accident assessment expertise on shift. Since this change does not modify any technical requirements, it is administrative and has no adverse impact on safety.

DISCUSSION OF CHANGES
ITS: 5.2 - ORGANIZATION

ADMINISTRATIVE CHANGES

- A9 CTS 6.3.2 requires that the STA meet the requirements of either Option 1 (combined SRO/STA position) or Option 2 (continued use of STA position); and that, when invoking Option 1, the STA role may be filled by the Shift Manager or the Control Room Supervisor. These details are adequately addressed in the "Commission Policy Statement on Engineering Expertise on Shift," and need not be repeated in the ITS. Since this change does not modify any technical requirements, it is administrative and has no adverse impact on safety.
- A10 CTS 6.3.3 requires that any qualification deviations (CTS 6.3.1 and 6.3.2) will be justified to the NRC prior to an individual's filling of one of the identified positions. This requirement is adequately addressed in the federal regulations (e.g., 10 CFR 50.54, 10 CFR 50.120) and need not be repeated in the ITS. Since this change does not modify any technical requirements, it is administrative and has no adverse impact on safety.

TECHNICAL CHANGES - MORE RESTRICTIVE

- M1 CTS 6.2.2.4 allows up to 2 hours to restore the shift crew to the minimum complement in the event of illness or unexpected absence. ITS 5.2.2.c and 5.2.2.d require the same actions provided, however, that immediate action is taken to restore the shift crew composition to within the minimum requirements. This change, by imposing additional requirements in order to maintain the same flexibility, is therefore more restrictive and has no adverse impact on safety.

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

- LA1 Details of CTS Table 6.2-1 Note "***" requires that both licensed ROs on shift be in the control room during plant startup or planned shutdown. These details are not retained in the ITS and are relocated to the UFSAR.

The details associated with the involved Specification are not required to be in the ITS to provide adequate protection of the public health and safety because minimum shift staffing requirements are addressed in 10 CFR 50.54(m), and this requirement is a plant specific enhancement. This approach provides an effective level of regulatory control and

DISCUSSION OF CHANGES
ITS: 5.2 - ORGANIZATION

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

LA1 (continued)

provides for a more appropriate change control process. The level of safety of facility operation is unaffected by the change because there is no change in the overall operational requirements. Furthermore, NRC and licensee resources associated with processing license amendments to these requirements will be reduced. Therefore, relocation of these details is acceptable. Changes to the UFSAR will be controlled by the provisions of 10 CFR 50.59.

LA2 CTS 6.2.2.6 requires limits on the working hours of the plant staff, and administrative controls on the use of overtime. These details are not retained in the ITS and are relocated to plant procedures.

The details associated with the involved Specification are not required to be in the ITS to provide adequate protection of the public health and safety because overtime limitations are adequately addressed by licensee commitments to NUREG-0737, and by miscellaneous IE Circulars and Generic Letters. In addition, specific controls for working hours of plant staff are described in plant procedures that require a deliberate decision making process to minimize the potential for impaired personnel performance and established procedure control processes provide sufficient control for changes to the procedures. This approach provides an effective level of control and provides an appropriate change control process. The level of safety of facility operation is unaffected by the change because there is no change in the overall operational requirements. Furthermore, NRC and licensee resources associated with processing license amendments to these requirements will be reduced. Therefore, relocation of these details is acceptable. This change is consistent with generic change traveler TSTF-258, R4.

RAI 5.2-1, TSTF-258, R4

LA3 Details of CTS 6.3.2 Note (1), which state that the 13 individuals who hold SRO licenses and have completed the FitzPatrick Advanced Technical Training Program prior to issuance of License Amendment 111 shall be considered qualified as dual-role SRO/STAs, are not retained in the ITS and are relocated to the UFSAR.

The details associated with the involved Specification are not required to be in the ITS to provide adequate protection of the public health and safety because qualification acceptance for the 13 individuals is included in the License Amendment No. 111 documentation. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. The level of safety of facility operation is unaffected by the change because there is no change in the overall operational requirements. Furthermore, NRC and

DISCUSSION OF CHANGES
ITS: 5.2 - ORGANIZATION

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

LA3 (continued)

licensee resources associated with processing license amendments to these requirements will be reduced. Therefore, relocation of these details is acceptable. Changes to the UFSAR will be controlled by the provisions of 10 CFR 50.59.

LA4 Details of the minimum shift crew requirements located in CTS Table 6.2-1 (for the SRO and RO) are proposed to be relocated to the UFSAR. The minimum shift crew requirements for licensed operators and senior operators are contained in 10 CFR 50.54(k), (l), and (m) and do not need to be repeated in the ITS. In addition, proposed Specification 5.2.2 contains requirements for the control room command function, proposed Specification 5.2.2.b contains minimum requirements for licensed Reactor Operators and Senior Operators to be present in the Control Room, and proposed Specification 5.2.2.f contains requirements with regard to "Engineering Expertise on Shift." The relocation of details of the minimum shift crew requirements to the UFSAR is acceptable considering the controls provided by regulations, the remaining requirements in the ITS, and the UFSAR change control process (10CFR50.59). This change is also consistent with TSTF-258, R4.

LA5 Details in CTS RETS 7.1b that specify the responsibility, of the General Manager-Operations, to the implementation of the Radiological Effluent Technical Specifications (RETS) are being relocated to the Quality Assurance Program description consistent with the requirements of ITS 5.2.1a. The conversion to ITS has caused applicable RETS requirements, and the associated responsibilities, to be incorporated within ITS or relocated to plant programs or manuals established consistent with ITS format. Therefore, the relocated requirements are not required to be in the ITS to provide adequate protection of the public health and safety. Changes to the Quality Assurance Program description will be controlled in accordance with the requirements of 10 CFR 50.54(a) to help ensure that proper reviews affecting safe operation of the plant are performed.

RAE 5.2-1, TSTF-258, R4

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L1 Not used.

TECHNICAL CHANGES - RELOCATIONS

None

CTS Amend 270

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.2

Organization

NO SIGNIFICANT HAZARDS CONSIDERATION
(NSHC) FOR LESS RESTRICTIVE CHANGES

NO SIGNIFICANT HAZARDS CONSIDERATION
ITS: 5.2 - ORGANIZATION

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L1 CHANGE

Not used.

CTS Amend 270

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.2

Organization

MARKUP OF NUREG-1433, REVISION 1
SPECIFICATION

5.0 ADMINISTRATIVE CONTROLS

LTS

5.2 Organization

[6.2.1]

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.



[6.2.1.1]

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 shall be documented in the (FSAR);



[6.2.1.2]

Insert 5.2.1-1

b. The Plant Superintendent 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;

inspector

Chief nuclear officer

[6.2.1.3]

c. The (a specified corporate executive position) 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

TAI

[6.2.1.4]



d. The individuals who train the operating staff, carry out health physics, 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.

[6.2.2]

5.2.2



plant

PAI

The unit staff organization shall include the following:

[6.2-1]

a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator

DBI

At least one non-licensed operator shall be on site when the plant is in MODE 4 or 5. At least two non-licensed operators shall be on site when the plant is in MODE 1, 2, or 3.

(continued)

BWR/4 STS
JAFNPP

Rev 1, 04/07/95
Amendment

TYP ALL PAGES

ITS INSERT 5.2.1-1

TAI

, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications.

5.2 Organization

5.2.2

Unit Staff (continued)

Plant PA-1 DB-1

shall be assigned for each control room from which a reactor is operating in MODES 1, 2, or 3.

Two unit sites with both units shutdown or defueled require a total of three non-licensed operators for the two units.

b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

TA2
b

TA2

Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.g for a period of time not to exceed 2 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.

[6.2.2.4]

TA2
c

[T6.2-1]
[6.2.2.4]

A ~~Health Physics~~ 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.

TA1

Administrative procedures shall be developed and implemented to limit the working hours of personnel ~~unit staff~~ who perform safety related functions (e.g., licensed ~~SROs~~, licensed ~~ROs~~, ~~health physicists~~, auxiliary operators, and key maintenance personnel).

TA2

TA1

radiation protection technicians

Senior Reactor Operators (SROs) Reactor Operators (ROs)

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work an [8 or 12] hour day, nominal 40 hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

- 1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;

(continued)

5.2 Organization

5.2.2

Unit Staff (continued)

Plant

PA1

- 2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;
- 3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;
- 4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

INSERT
5.2.2-1

TA2

INSERT
5.2.2-2

Any deviation from the ^{working hour} ~~above~~ guidelines shall be authorized in advance by the ^{manager} ~~Plant Superintendent~~ or ^{the Plant manager} ~~his~~ designee, 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.

TA2

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the [Plant Superintendent] or his designee to ensure that excessive hours have not been assigned. Routine deviation from the ~~above~~ guidelines is not authorized.

TA2

The amount of overtime worked by unit staff members performing safety related functions shall be limited and controlled in accordance with the NRC Policy Statement on working hours (Generic Letter 82-12).

TA2

[6.2.2.5]

e) a)

The ~~Operations Manager or Assistant Operations Manager~~ shall hold an SRO license.

TA1

[6.3.2]

[T 6.2-1]

f) b)

The ~~Shift Technical Advisor (STA)~~ shall provide advisory technical support to the Shift Supervisor (SS) in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the ~~plant~~. ^{Plant} ~~In~~ addition, the ~~STA~~ shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift, published in the October 28, 1985 Federal Register (50 FR 43621).

X1

Plant

PA1

PA2

This individual

TA2

When the plant is in mode 1, 2, or 3, an individual

BWR/4 STS

5.0-4

Rev 1, 04/07/95

CLB1

REVISION H

INSERT 5.2.2-1

TA2

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.

INSERT 5.2.2-2

TA2

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.

TS7E 258, P4

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.2

Organization

JUSTIFICATION FOR DIFFERENCES (JFDs)
FROM NUREG-1433, REVISION 1

JUSTIFICATION FOR DIFFERENCES FROM NUREG-1433, REVISION 1
ITS: 5.2 - ORGANIZATION

RETENTION OF EXISTING REQUIREMENT (CLB)

CLB1 ITS 5.2.2.f (ISTS 5.2.2.g) Statement of applicability added to reflect that the individual providing the "Engineering Expertise on Shift" is only required when the plant is in MODE 1, 2, or 3, consistent with current licensing basis.

TSTF-258, R4
P

PLANT SPECIFIC WORDING PREFERENCE OR MINOR EDITORIAL IMPROVEMENT (PA)

PA1 Wording preference: the term, "unit," is replaced with the term, "plant."

PA2 Reference to Federal Register and publication date added for clarity.

PLANT SPECIFIC DIFFERENCE IN DESIGN OR DESIGN BASIS (DB)

DB1 ITS 5.2.2.a has been revised to reflect JAFNPP design which is only a single unit/control room plant site.

DIFFERENCE BASED ON APPROVED TRAVELER (TA)

TA1 The changes presented in Technical Specification Task Force (TSTF) Technical Specification Change Traveler number 65, Revision 1, have been incorporated into the revised Improved Technical Specifications.

TA2 The changes presented in Technical Specification Task Force (TSTF) Technical Specification Change Traveler number 258, Revision 4, have been incorporated into the revised Improved Technical Specifications.

RAI 5.2-1
P

DIFFERENCE BASED ON PENDING TRAVELER (TP)

TP1 Not Used.

DIFFERENCE FOR OTHER REASONS THAN ABOVE (X)

X1 ITS 5.2 has been revised and descriptions provided to reflect CTS 6.2 and 6.3 changes to plant specific management titles (A2). These changes are consistent with the letter from C. I. Grimes (NRC) to the four Owners' Groups, dated November 10, 1994 and TSTF-65, R1.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.2

Organization

RETYPE PROPOSED IMPROVED TECHNICAL
SPECIFICATIONS (ITS)

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for plant 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 those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the UFSAR/Quality Assurance Program;
- 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. The chief nuclear officer 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, 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 Plant Staff

The plant staff organization shall include the following:

- a. At least one non-licensed operator shall be on site when the plant is in MODE 4 or 5. At least two non-licensed operators shall be on site when the plant is in MODE 1, 2, or 3.
- b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 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.
- c. 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.
- d. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), radiation protection technicians, auxiliary operators, and key maintenance personnel.

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.

Any deviation from the working hour guidelines shall be authorized in advance by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.

- e. The operations manager or assistant operations manager shall hold an SRO license.

5.2 Organization (continued)

- f. When the plant is in MODE 1, 2, or 3, an individual shall provide advisory technical support to the shift supervisor (SS) in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the plant. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift, published in the October 28, 1985 Federal Register (50 FR 43621).
-
-

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.3

Plant Staff Qualifications

**MARKUP OF CURRENT TECHNICAL SPECIFICATIONS
(CTS)**

DISCUSSION OF CHANGES (DOCs) TO THE CTS

**NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC)
FOR LESS RESTRICTIVE CHANGES**

MARKUP OF NUREG-1433, REVISION 1, SPECIFICATION

**JUSTIFICATION FOR DIFFERENCES (JFDs) FROM
NUREG-1433, REVISION 1**

**RETYPE PROPOSED IMPROVED TECHNICAL
SPECIFICATIONS (ITS)**

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.3

Plant Staff Qualifications

MARKUP OF CURRENT TECHNICAL SPECIFICATIONS (CTS)

A1

JAFNPP

[5.3]

[5.3.1] 6.3 PLANT STAFF QUALIFICATIONS

A3

CTS Amend 270

6.3.1 The minimum qualifications with regard to educational background and experience for plant staff positions (shown in FSAR Figure 13.2-7) shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions; except for the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

CTS INSERT 248-1

A4

6.3.2 The Shift Technical Advisor (STA) shall meet or exceed the minimum requirements of either Option 1 (Combined SRO/STA Position) or Option 2 (Continued use of STA Position), as defined in the Commission Policy Statement on Engineering Expertise on Shift, published in the October 28, 1985 Federal Register (50 FR 43621). When invoking Option 1, the STA role may be filled by the Shift Manager or Control Room Supervisor. (1)

TSTF-258, R4

6.3.3 Any deviations will be justified to the NRC prior to an individual's filling of one of these positions.

NOTE:

(1) The 13 individuals who hold SRO licenses, and have completed the FitzPatrick Advanced Technical Training Program prior to the issuance of License Amendment 111, shall be considered qualified as dual-role SRO/STAs.

See ITS Section 5.2

6.4 RETRAINING AND REPLACEMENT TRAINING

A training program shall be maintained under the direction of the Training Manager to assure overall proficiency of the plant staff organization. It shall consist of both retraining and replacement training and shall meet or exceed the minimum requirements of Section 5.5 of ANSI N18.1-1971.

The retraining program shall not exceed periods two years in length with a curriculum designed to meet or exceed the requalification requirements of 10 CFR 55.59

6.5 REVIEW AND AUDIT

Review requirements are completed by using designated technical reviewers/qualified safety reviewer and two separate review committees. The Plant Operating Review Committee (PORC) is an onsite review group; the Safety Review Committee (SRC) is an independent offsite review and audit group.

6.5.0 REVIEW AND APPROVAL OF PROGRAMS AND PROCEDURES

6.5.0.1 The procedure review and approval process shall be controlled and implemented by administrative procedure(s).

6.5.0.2 Each program and procedure required by Specification 6.8 and other procedures that affect nuclear safety, and changes thereto, shall be reviewed by a minimum of two designated technical reviewers who are knowledgeable in the affected functional area.

See ITS Section 6.0

CTS Amend 270

CTS INSERT 248-1

A4

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).

TS 5.3.1, R4

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.3

Plant Staff Qualifications

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
ITS: 5.3 - PLANT STAFF QUALIFICATIONS

ADMINISTRATIVE CHANGES

- A1 In the conversion of the James A. FitzPatrick Nuclear Power Plant (JAFNPP) Current Technical Specifications (CTS) to the proposed plant specific Improved Technical Specifications (ITS) certain wording preferences or conventions are adopted which do not result in technical changes. Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the conventions in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4", Revision 1 (i.e., Improved Standard Technical Specifications (ISTS)).
- A2 Not used.
- A3 CTS 6.3.1 reference, to staff positions shown in FSAR Figure 13.2-7 (Plant Staff Organization), are deleted. ITS 5.3.1 retains the requirement for staff qualifications of ANSI N18.1-1971 but does not require the identification of the location of the plant organization chart. This change, removes unnecessary detail, does not reduce or eliminate any plant staff qualifications, retains requirements consistent with NUREG-1433, Revision 1, and is considered administrative. This change has no impact on safety.
- A4 CTS 6.3 plant staff qualifications, is supplemented to provide clarification that the minimum staffing requirements stipulated in 10 CFR 50.54(m) for personnel actively performing the functions of licensed Senior Reactor Operators (SROs) and Reactor Operators (ROs), can be exceeded without requiring a license amendment provided the SRO or RO functions and duties are divided and rotated in a manner which provided each SRO or RO with meaningful and significant opportunity to maintain proficiency. Since this change does not eliminate any qualifications, responsibilities or requirements for SROs or ROs it is administrative and has no adverse impact on safety. The change is also consistent with TSTF-258, Revision 4.

CTS Amend 270

TSTF-258, R4

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

None

DISCUSSION OF CHANGES
ITS: 5.3 - PLANT STAFF QUALIFICATIONS

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

None

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.3

Plant Staff Qualifications

**NO SIGNIFICANT HAZARDS CONSIDERATION
(NSHC) FOR LESS RESTRICTIVE CHANGES**

NO SIGNIFICANT HAZARDS CONSIDERATION
ITS: 5.3 - PLANT STAFF QUALIFICATIONS

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.3

Plant Staff Qualifications

**MARKUP OF NUREG-1433, REVISION 1
SPECIFICATION**

5.0 ADMINISTRATIVE CONTROLS

Plant PAI

X13

5.3 Unit Staff Qualifications

Reviewer's Note: Minimum qualifications for members of the unit staff shall be specified by use of an overall qualification statement referencing an ANSI Standard acceptable to the NRC staff or by specifying individual position qualifications. Generally, the first method is preferable; however, the second method is adaptable to those unit staffs requiring special qualification statements because of unique organizational structures.

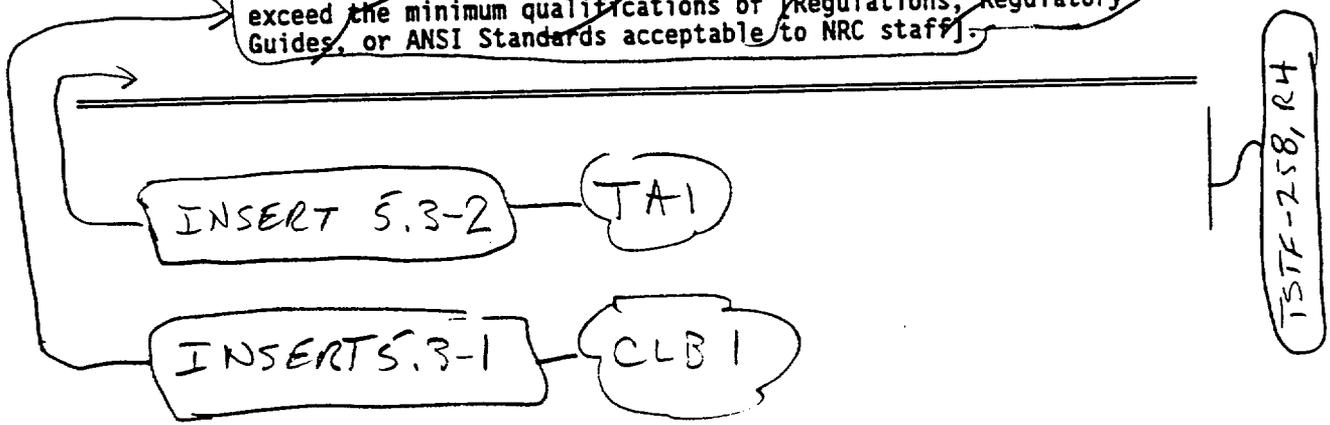
Plant

PAI

5.3.1

Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 2, 1987, or more recent revisions, or ANSI Standard acceptable to the NRC staff]. The staff not covered by [Regulatory Guide 1.8] shall meet or exceed the minimum qualifications of [Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff].

[6.3.1]



BWR/STS
JAFNPP

Rev 1/04/07/95
Amendment
TYP All Pages

Insert 5.3-1

CLB 1

ANSI N18.1-1971 for comparable positions except for the radiation protection manager, who shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1, September 1975.

CTS Amend 27D

INSERT 5.3-2

TA 1

5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and licensed Reactor Operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.2, perform the functions described in 10 CFR 50.54(m).

TS7F-258, RH

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.3

Plant Staff Qualifications

JUSTIFICATION FOR DIFFERENCES (JFDs) FROM NUREG-1433, REVISION 1

JUSTIFICATION FOR DIFFERENCES FROM NUREG-1433, REVISION 1
ITS: 5.3 - PLANT STAFF QUALIFICATIONS

RETENTION OF EXISTING REQUIREMENT (CLB)

CLB1 ITS 5.3.1 bracketed items have been revised to reflect the specific current licensing requirements at JAFNPP, for plant staff qualifications utilizing ANSI N18.1-1971 and Regulatory Guide 1.8, Revision 1, September 1975.

PLANT SPECIFIC WORDING PREFERENCE OR MINOR EDITORIAL IMPROVEMENT (PA)

PA1 Wording preference: the term, "unit," is replaced with the term, "plant."

PLANT SPECIFIC DIFFERENCE IN DESIGN OR DESIGN BASIS (DB)

None

DIFFERENCE BASED ON APPROVED TRAVELER (TA)

TA1 The changes presented in TSTF Technical Specification Change Traveler number 258, Revision 4, have been incorporated into the revised Improved Technical Specifications.

TSTF-258, R4
P

DIFFERENCE BASED ON PENDING TRAVELER (TP)

None

DIFFERENCE FOR OTHER REASONS THAN ABOVE (X)

X1 The bracketed "Reviewer's Note" has been deleted. This information is for the NRC reviewer to understand exactly what is needed to meet this requirement. This is not meant to be retained in the final version of the plant specific information.

X2 Not used.

CTS
Amend 270
T

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.3

Plant Staff Qualifications

RETYPE PROPOSED IMPROVED TECHNICAL
SPECIFICATIONS (ITS)

5.0 ADMINISTRATIVE CONTROLS

5.3 Plant Staff Qualifications

- 5.3.1 Each member of the plant staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions except for the radiation protection manager, who shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1, September 1975.
- 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).
-

TS 5.3.1 - 258, R4

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.4

Procedures

**MARKUP OF CURRENT TECHNICAL SPECIFICATIONS
(CTS)**

DISCUSSION OF CHANGES (DOCs) TO THE CTS

**NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC)
FOR LESS RESTRICTIVE CHANGES**

MARKUP OF NUREG-1433, REVISION 1, SPECIFICATION

**JUSTIFICATION FOR DIFFERENCES (JFDs) FROM
NUREG-1433, REVISION 1**

**RETYPE PROPOSED IMPROVED TECHNICAL
SPECIFICATIONS (ITS)**

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.4

Procedures

MARKUP OF CURRENT TECHNICAL
SPECIFICATIONS (CTS)

Section 5.4
AI

JAFNPP

See CTS Chapter 6.0

6.6 REPORTABLE EVENT ACTION

The following actions shall be taken for Reportable Events:

- (A) The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and
- (B) Each Reportable Event shall be reviewed by the PORC, and the results of this review shall be submitted to the Chief Nuclear Officer, the Director Regulatory Affairs and Special Projects, and the Chairman of the SRC.

see ITS: Chapter 2.0

6.7 SAFETY LIMIT VIOLATION

- (A) If a safety limit is exceeded, the reactor shall be shut down and reactor operation shall only be resumed in accordance with the provisions of 10 CFR 50.36, (c)(1)(i).
- (B) An immediate report of each safety limit violation shall be made to the NRC by the Site Executive Officer. The Chief Nuclear Officer, the Director Regulatory Affairs and Special Projects, and the Chairman of the SRC will be notified within 24 hours.
- (C) The PORC shall prepare a complete investigative report of each safety limit violation and include appropriate analysis and evaluation of: (1) applicable circumstances preceding the occurrence, (2) effects of the occurrence upon facility component systems or structures and (3) corrective action required to prevent recurrence. The Site Executive Officer shall forward this report to the Chief Nuclear Officer, the Director Regulatory Affairs and Special Projects, the Chairman of the SRC, and the NRC.

[5.4]

5.4 PROCEDURES

[5.4.1]

- (A) Written procedures and administrative policies shall be established, implemented, and maintained:
 1. meet or exceed the requirements and recommendations of Section 5 of ANSI 18.7-1972 "Facility Administrative Policies and Procedures." LA1
 - (a) 2. recommended in Appendix A of Regulatory Guide 1.33, November 1972.
 - (a) 3. implement the Fire Protection Program. The applicable procedures LA2
 4. include programs specified in Appendix B of the Radiological Effluent Technical Specifications, Section 7.2. LA1
- (B) Each procedure of Specification 6.8.(A), and changes thereto, shall be approved prior to implementation by the appropriate responsible member of management as specified in Specification 6.5.0. LA1

b. The EOPs required to implement the requirements of NUREG 0737 and NUREG 0737 Supp. 1, as stated in GL 82-33;

e. All programs specified in Specification 5.5.

MI
HST Amend 254
CTS Amend 254

Amendment No. 50, 60, 65, 70, 93, 110, 220, 222, 228, 240

(A)

JAFNPP

- (C) Temporary changes to the procedures required by Specification 6.8.(A) may be made provided:
1. the intent of the original procedure is not altered.
 2. the change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's license.
 3. the change is documented, reviewed and approved by the appropriate member of plant management as required by Specification 6.5.0 within 14 days of implementation.

(LAI)

6.9 REPORTING REQUIREMENTS

(A) ROUTINE REPORTS

The following reports shall be submitted in accordance with 10 CFR 50 unless otherwise noted.

1. STARTUP REPORT

a. A summary report of plant startup and power escalation testing shall be submitted following (1) amendment to the license involving a planned increase in power level, (2) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (3) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant. The Startup Report for the initial fuel cycle shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report. Startup Reports for subsequent fuel cycles shall address startup tests that are necessary to demonstrate the acceptability of changes and modifications.

See ITS Section 5.6

ITS Amend 254

A1

JAFNPP

ITS

7.0 ADMINISTRATIVE CONTROLS

See ITS Section 5.1

7.1 RESPONSIBILITY

a. The Site Executive Officer shall have direct responsibility for assuring the operation of the James A. FitzPatrick Plant is conducted in such a manner as to provide continuing protection to the environment and shall delegate in writing the succession to this responsibility during his absence.

b. Implementation of the Radiological Effluent Technical Specifications is the responsibility of the General Manager - Operations, with the assistance of the plant staff organization.

See ITS Section 5.2

[5.4] 7.2 PROCEDURES

[5.4.1] Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5 "Facility Administrative Policies and Procedures" of ANSI 18.7-1972 and Regulatory Guide 1.33, November 1972, Appendix A. In addition, procedures shall be established, implemented and maintained for the PCP, ODCM, and Quality Control Program for effluent and environmental monitoring using the guidance in Regulatory Guide 4.1.

LA1

A3

LA1

[5.4.1.c]

[5.4.1.e]

Revision 1

7.3 REPORTING REQUIREMENTS

a. Planned Liquid and Gaseous Releases

See ITS Section 5.6

The limits for radioactive materials contained in liquid and gaseous effluents are contained in Specifications 2.3, 3.3 and 3.4.

b. Environmental Samples Exceeding Limits of Table 6.1-2

When the limits of Table 6.1-2 are exceeded, refer to Specification 6.1.b for reporting requirements.

c. Semiannual Radioactive Effluent Release Report

Routine Radioactive Effluent Release Reports covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The period of the first report shall begin with the date of initial criticality.

1. The Radioactive Effluent Release Report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit using as guidance Regulatory Guide 1.21, Revision 1, June 1974, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants", with data summarized on a quarterly basis following the format of Appendix B thereof.

ITS Amend 254

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.4

Procedures

DISCUSSION OF CHANGES (DOCs) TO THE CTS

DISCUSSION OF CHANGES
ITS: 5.4 - PROCEDURES

ADMINISTRATIVE CHANGES

- A1 In the conversion of the James A. FitzPatrick Nuclear Power Plant (JAFNPP) Current Technical Specifications (CTS) to the proposed plant specific Improved Technical Specifications (ITS) certain wording preferences or conventions are adopted which do not result in technical changes. Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the conventions in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4", Revision 1 (i.e., Improved Standard Technical Specifications (ISTS)).
- A2 CTS 6.8.A.4 requires that written procedures be implemented for programs specified in Appendix B, Radiological Effluent Technical Specifications (RETS), Section 7.2. This specification is not retained in the ITS because the specific programs specified in RETS 7.2 are retained in ITS 5.4.1.c and 5.4.1.e. Since this change does not modify any technical requirements, it is administrative and has no adverse impact on safety.
- A3 CTS RETS 7.2 requires procedures be implemented for the Process Control Program (PCP). The PCP implements the requirements of 10 CFR 20, 10 CFR 61, and 10 CFR 71. Since these types of procedures are also required by CTS 6.8.A.2, which references Regulatory Guide 1.33, and are retained by ITS 5.4.1.a, it is not necessary to specifically identify them again in the ITS. Since this change does not modify any technical requirements, it is administrative and has no adverse impact on safety.

TECHNICAL CHANGES - MORE RESTRICTIVE

- M1 CTS 6.8(A) is revised to add two classifications of procedures which, although currently exist, are not required by the current Technical Specifications.
- ITS 5.4.1.b requires establishing, implementing and maintaining emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33. ITS 5.4.1.b assures that existing procedures and commitments made in response to guidance provided in Generic Letter 82-33, not currently included in Technical Specifications, are maintained and that the guidance and commitments are appropriately considered for changes to these procedures.

Also, ITS 5.4.1.e requires establishing, implementing and maintaining

DISCUSSION OF CHANGES
ITS: 5.4 - PROCEDURES

TECHNICAL CHANGES - MORE RESTRICTIVE

M1 (continued)

procedures for all programs (twelve) specified in Specification 5.5. Although, requirements and procedures for these applications currently exist, these are additional restrictions in that they will be controlled through Technical Specifications. This change has no adverse impact on safety.

TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

LA1 Details in CTS 6.8(A)1, CTS 6.8(B), CTS 6.8(C), and CTS RETS 7.2 which establish specific requirements for development, review and approval, and changes of procedures are being relocated to the Quality Assurance Program description. The requirements for the establishment, maintenance, and implementation of procedures related to activities affecting quality are contained in 10 CFR 50 Appendix B, Criterion II and Criterion IV, 10 CFR 50.73, 10 CFR 50.59, ANSI N18.7-1972, and other applicable regulations and standards. In accordance with these requirements, the Quality Assurance Program description will include adequate detail with respect to the administrative control of procedures affecting quality and nuclear safety. Additionally, NRC Administrative Letter 95-06 specifies that details regarding review and approval of procedures may be adequately addressed in the Quality Assurance Plan. Therefore, the relocated requirements are not required to be in the ITS to provide adequate protection of the public health and safety. Changes to the Quality Assurance Program description will be controlled in accordance with the requirements of 10 CFR 50.54(a) to help ensure that proper reviews affecting safe operation of the plant are performed.

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

None

TECHNICAL CHANGES - RELOCATIONS

None

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.4

Procedures

**NO SIGNIFICANT HAZARDS CONSIDERATION
(NSHC) FOR LESS RESTRICTIVE CHANGES**

NO SIGNIFICANT HAZARDS CONSIDERATION
ITS: 5.4 - PROCEDURES

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

There are no plant specific less restrictive changes for this Specification.

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.4

Procedures

**MARKUP OF NUREG-1433, REVISION 1
SPECIFICATION**

5.0 ADMINISTRATIVE CONTROLS

CTS

5.4 Procedures

[6.8.A]

5.4.1

Written procedures shall be established, implemented, and maintained covering the following activities:

CLB1

November 1972

[6.8.A.2]

a. The applicable procedures recommended in Regulatory Guide 1.33, ~~Revision 2~~, Appendix A, ~~February 1978~~;

[Doc M1]

b. The emergency operating procedures required to implement the requirements of NUREG-0737 and ~~to~~ NUREG-0737, Supplement 1, as stated in ~~Generic Letter 82-33~~;

X1

[RETS 7.2]

c. Quality assurance for effluent and environmental monitoring;

Program radioactive radiological

PA1

[6.8.A.3]

d. Fire Protection Program implementation; and

[RETS 7.2]
[M1]

e. All programs specified in Specification 5.5.

BWR/4/STS

IAFNPP

Rev 1/04/07/95

Amendment

TYP
all
pages

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.4

Procedures

JUSTIFICATION FOR DIFFERENCES (JFDs) FROM NUREG-1433, REVISION 1

JUSTIFICATION FOR DIFFERENCES FROM NUREG-1433, REVISION 1
ITS: 5.4 - PROCEDURES

RETENTION OF EXISTING REQUIREMENT (CLB)

CLB1 ITS 5.4.1.a has been revised to reflect the specific JAFNPP requirements of, Regulatory Guide 1.33, Appendix A, November 1972 consistent with CTS 6.8.A.2, and UFSAR Appendix 17.2B.

PLANT SPECIFIC WORDING PREFERENCE OR MINOR EDITORIAL IMPROVEMENT (PA)

PA1 Editorial changes have been made for enhanced clarity or to correct a grammatical/typographical error.

PLANT SPECIFIC DIFFERENCE IN DESIGN OR DESIGN BASIS (DB)

None

DIFFERENCE BASED ON APPROVED TRAVELER (TA)

None

DIFFERENCE BASED ON PENDING TRAVELER (TP)

None

DIFFERENCE FOR OTHER REASONS THAN ABOVE (X)

X1 ITS 5.4.1.b brackets have been removed and the information revised to reflect the addition of requirements consistent with NUREG-0737 and NUREG-0737, Supplement 1 and Generic Letter 82-33 (M1).

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.4

Procedures

**RETYPE PROPOSED IMPROVED TECHNICAL
SPECIFICATIONS (ITS)**

5.0 ADMINISTRATIVE CONTROLS

5.4 Procedures

- 5.4.1 Written procedures shall be established, implemented, and maintained covering the following activities:
- a. The applicable procedures recommended in Regulatory Guide 1.33, Appendix A, November 1972;
 - b. The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;
 - c. Quality assurance program for radioactive effluent and radiological environmental monitoring;
 - d. Fire Protection Program implementation; and
 - e. All programs specified in Specification 5.5.
-

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.5

Programs and Manuals

**MARKUP OF CURRENT TECHNICAL SPECIFICATIONS
(CTS)**

DISCUSSION OF CHANGES (DOCs) TO THE CTS

**NO SIGNIFICANT HAZARDS CONSIDERATION (NSHC)
FOR LESS RESTRICTIVE CHANGES**

MARKUP OF NUREG-1433, REVISION 1, SPECIFICATION

**JUSTIFICATION FOR DIFFERENCES (JFDs) FROM
NUREG-1433, REVISION 1**

**RETYPE PROPOSED IMPROVED TECHNICAL
SPECIFICATIONS (ITS)**

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.5

Programs and Manuals

**MARKUP OF CURRENT TECHNICAL
SPECIFICATIONS (CTS)**

AI

RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATION

1.0 DEFINITIONS

See ITS Chapter 1.0

A. Dose Equivalent I-131

The Dose Equivalent I-131 is the concentration of I-131 (microcuries/gram) which 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 International Commission on Radiological Protection Publication 30 (ICRP-30), "Limits for Intake by Workers" or in NRC Regulatory Guide 1.109, Revision 1, October 1977.

B. Instrument Channel Calibration

See Appendix A Technical Specifications.

C. Instrument Channel Functional Test

See Appendix A Technical Specifications.

D. Instrument Check

See Appendix A Technical Specifications.

E. Logic System Function Test

See Appendix A Technical Specifications.

F. Members(s) of the Public

Member(s) of the Public includes all persons who are not occupationally associated with the facilities on the Entergy Nuclear FitzPatrick, LLC (ENF)/(NMPC) Niagara Mohawk Power Corporation site. This category does not include employees of the companies, its contractors or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational, or other purposes not associated with the plants.

G. Offgas Treatment System

The Offgas Treatment System is the system designed and installed to: reduce radioactive gaseous effluents by collecting primary coolant system offgases from the main condenser; and, providing for delay of the offgas for the purpose of reducing the total radioactivity prior to release to the environment.

[5.5.1.a]

④ Offsite Dose Calculation Manual (ODCM)

The ODCM describes the methodology and parameters to be used in the calculation of offsite doses due to radioactive gaseous and liquid effluents and in the calculation of gaseous and liquid effluents monitoring instrumentation alarm/trip set points and in the conduct of the environmental monitoring program.

I. Operable

See Appendix A Technical Specifications.

radiological

Amendment No. 93, 261, 268

1
[RETS]

See ITS Chapter 1.0

828
CTS Amend 268

(A1)

see CTS Chapter 6.0

6.16 PROCESS CONTROL PROGRAM (PCP)

- A. The PCP shall be a manual containing operational information concerning the solidification of radioactive wastes from liquid systems.
- B. The PCP shall be maintained at the plant consistent with these Technical Specifications and with approved plant procedures.
- C. Revisions of the PCP:
 - 1. shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the revisions were made effective. This submittal shall contain:
 - a. sufficiently detailed information to support the rationale for the revisions without benefit of additional information;
 - b. a determination that the revision did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and
 - c. documentation that the revision has been reviewed and found acceptable by the PORC.
 - 2. shall become effective upon issue following review and acceptance by the PORC.

[5.5.1]

6.57 OFFSITE DOSE CALCULATION MANUAL (ODCM)

[5.5.1.a]

- A. The ODCM shall describe the methodology and parameters to be used in the calculation of offsite doses due to radioactive gaseous and liquid effluents and in the calculation of gaseous and effluents monitoring instrumentation alarm/trip setpoints ~~consistent with the applicable LCDs contained in these Technical Specifications.~~
- B. ~~The ODCM shall be maintained at the plant and shall reflect accepted methodologies and calculational procedures.~~

A2

Amendment No. 93

258b

INSERT 258b-1

MG

ADD 5.5.1.b

CTS Amend 268

MG

- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release, reports required by Specification 5.6.2 and Specification 5.6.3.

CTS Amend 268

A1

Licensee initiated

in the form of a complete legible copy of the entire ODCM as part of or concurrent with

[5.5.1.c]

C. Revisions of the ODCM:

M6

[5.5.1.c.3]

1. shall be submitted to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the revisions were made effective. This document shall

[5.5.1.c.1.(a)]

INSERT 25Bc-1

a. sufficiently detailed information to support the rationale for the revisions without benefit of additional information (information submitted shall consist of revised pages of the ODCM, with each page numbered and provided with an approval and date box, together with appropriate evaluations justifying the revisions); analyses OR

M6

Editorial

[5.5.1.c.1.(b)]

INSERT 25Bc-2

b. a determination that the revisions will not reduce the accuracy or reliability of dose calculation or setpoint determinations; and records of reviews performed shall be retained.

M6

effluent

[5.5.1.c.1]

c. documentation that the revisions have been reviewed and accepted by the PORC after approval of the plant manager.

M1

[5.5.1.c.2]

2. shall become effective upon issue following review and acceptance by the PORC.

SEE CTS Chapter 6.0

TSTF-76, R1

6.18 MAJOR MODIFICATIONS TO RADIOACTIVE LIQUID, GASEOUS AND SOLID WASTE TREATMENT SYSTEMS*

A. Major modifications to radioactive waste systems (liquid, gaseous and solid):

1. shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the modifications is completed and made operational. The discussion of each modification shall contain:

- a. a summary of the evaluation that led to the determination that the modification could made in accordance with 10 CFR 50.59;
- b. sufficient information to support the reason for the modification without benefit of additional or supplemental information; and
- c. a description of the equipment, components and processes involved and the interfaces with other plant systems.

* Entergy Nuclear Operations, Inc. may elect to submit the information called for in this Specification as part of the annual 10 CFR 50.59 Safety Evaluation Report.

CTS Amend 268

CTS INSERT 258c-1

MG

Section 5.5

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

CTS INSERT 258c-2

MG

maintain the levels of radioactive effluent control required pursuant to 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact

page 5 of 22

REVISION H

CTS Amend 268

A1

FOL
DPR-59

(3) Fire Protection

The licensee shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the facility and as approved in the SER dated November 20, 1972; the SER Supplement No. 1 dated February 1, 1973; the SER Supplement No. 2 dated October 4, 1974; the SER dated August 1, 1979; the SER Supplement dated October 3, 1980; the SER Supplement dated February 13, 1981; the NRC Letter dated February 24, 1981; Technical Specification Amendments 34 (dated January 31, 1978), 80 (dated May 22, 1984), 134 (dated July 19, 1989), 135 (dated September 5, 1989), 142 (dated October 23, 1989), 164 (dated August 10, 1990), 176 (dated January 16, 1992), 177 (dated February 10, 1992), 186 (dated February 19, 1993), 190 (dated June 29, 1993), 191 (dated July 7, 1993), 206 (dated February 28, 1994) and 214 (dated June 27, 1994); and NRC Exemptions and associated safety evaluations dated April 26, 1983, July 1, 1983, January 11, 1985, April 30, 1986, September 15, 1986 and September 10, 1992 subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

Primary
Coolant
Sources
Outside
Containment

AMENDMENT 218

(5.5.2)

(4) Systems Integrity

This program provides controls to minimize

~~the licensee shall implement a program to reduce~~ leakage from the systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

M7
INSERT
3a-1

1. ~~provisions establishing~~ ^{Preventive} maintenance and periodic visual inspection requirements, and
2. ^{Incorporated} Leak test requirements for the systems at a frequency not to exceed ~~operating~~ ^{24 month} cycle intervals.

9L5
Add
SR 3.0.2 and
SR 2.0.3
applicability

(5) Iodine Monitoring

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in areas vital to the mitigation of or recovery from an accident. This program shall include the following:

1. Training of personnel.
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

AMENDMENT 57

LAI

CTS Amend 268

CTS INSERT 3a-1

M7

Section 5.5

The systems include the Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Reactor Water Cleanup, process sampling, and Standby Gas Treatment.

CTS Amend 26B

Page 7 of 22

REVISION H

A1

JAFNPP

This program provides control that

[5.5.3] 5.19 POSTACCIDENT SAMPLING PROGRAM

A program shall be established, implemented, and maintained which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- A) Training of personnel,
- B) Procedures for sampling and analysis,
- C) Provisions for maintenance of sampling and analysis

[5.5.6] 5.20 PRIMARY CONTAINMENT LEAKAGE RATE TESTING PROGRAM

This program

A program shall be established to implement the leakage rate testing of the Primary Containment as required by 10 CFR 50.54 (c) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program", dated September 1995, as modified by the exception that Type C testing of valves not isolable from the containment free air space may be accomplished by pressurization in the reverse direction provided that testing in this manner provides equivalent or more conservative results than testing in the accident direction. If potential atmospheric leakage paths (e.g., valve stem packing) are not subjected to test pressure, the portions of the valve not exposed to test pressure shall be subjected to leakage rate measurement during regularly scheduled Type A testing. A list of these valves, the leakage rate measurement method, and the acceptance criteria, shall be contained in the Program.

- a) The peak Primary Containment internal pressure for the design basis loss of coolant accident (P_s), is 45 psig.
- b) The maximum allowable Primary Containment leakage rate (L_p), at P_s , shall be 1.5% of primary containment air weight per day.
- c) The leakage rate acceptance criteria are:
 1. Primary containment leakage rate acceptance criteria is $\leq 1.0 L_p$. During unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_p$ for the Type B and Type C tests and $\leq 0.75 L_p$ for the Type A tests;
 2. Airlock testing acceptance criteria are:
 - a. Overall airlock leakage rate is $\leq 0.05 L_p$ when tested at $\geq P_s$.
 - b. For each door seal, leakage rate is ≤ 120 scfd when tested at $\geq P_s$.
 3. MSIV leakage rate acceptance criteria is ≤ 11.5 scfm for each MSIV when tested at ≥ 25 psig.

D. The provisions of Specification 4.0.B do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

d) The provisions of Specification 4.0.C are applicable to the Primary Containment Leakage Rate Testing Program.

A5

Amendment No. 430, 234, 261

258e

SR 3.0.3

add ITS 5.5.4 Radioactive Effluent Controls Program

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

A6

TSTF-52, R3/ RAI 5.5-1

21

Component Cycle or Transient Limit

see CTS: Chapter 6.0

(M) The following records shall be retained for the duration of the Facility Operating License:

1. Records of any drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
2. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
3. Records of facility radiation and contamination surveys.
4. Records of radiation exposure for all individuals entering radiation control areas.
5. Records of gaseous and liquid radioactive material released to the environs.

[5.5.5]

This program provides controls to track

6. Records of transient or operational cycles for those facility components identified in Table 4.10

INSERT 255-1

7. Records of training and qualification for current members of the plant staff.
8. Records of in-service inspections performed pursuant to these Technical Specifications.
9. Records of Quality Assurance activities required by the Quality Assurance Manual.
10. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
11. Records of meetings of the PORC and the SRC.
12. Records for Environmental Qualification which are covered under the provisions of paragraph 6.15.
13. Records of the service life of all hydraulic and mechanical snubbers, whose failure could adversely affect any safety-related system, including the date at which the service life commences and associated installation and maintenance records as of the effective date of this amendment.

see CTS: Chapter 6.0

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared and adhered to for all plant operations. These procedures shall be formulated to maintain radiation exposures received during operation and maintenance as far below the limits specified in 10 CFR 20 as practicable. The procedures shall include planning, preparation, and training for operation and maintenance activities. They shall also include exposure allocation, radiation and contamination control techniques, and final debriefing.

Amendment No. 28, 29, 92
Order dated October 24, 1980

see ITS: Section 5.7

CTS Amend 261

AI

UFSAR Section 4.2 to ensure that components are maintained within the design limits.

CTS Amend 261

ITS

[5.5.5]

Amendment No. 22

261

TABLE G.10-1

COMPONENT CYCLIC OR TRANSIENT LIMITS

<u>COMPONENT</u>	<u>TRANSIENT CONDITION</u>	<u>OCCURRENCES</u>
Reactor Pressure Vessel	Normal Startup (100°F/hr)	120
	50% Power Operation	14,600
	Rod Worth Tests	400
	Loss of Feedwater Heaters	
	Turbine Trip at 25% Power	10
	Feedwater Heater Bypass	70
	Loss of Feedwater Pumps	10
	Turbine Generator Trip	40
	Reactor Overpressure	1
	Safety Valve Blowdown	2
	All Other Scrams	147
	Improper Start of Cold Recirc. Loop	5
	Sudden Start of Cold Recirc. Loop	5
	Normal Shutdown	
100°F/hr Cooldown (548-375°F)		
Shutdown Flooding (375-330°F)		
100°F/hr Cooldown (330-100°F)	118	

LA2

REVISION H

Page 11 of 22

CTS Amend 261

Section 5.5

(A1)

Section 5.5
A1

See ITS Chapter 3.0

3.0 Continued

4.0 Continued

D. Entry into an OPERATIONAL CONDITION (mode) or other specified condition shall not be made when the conditions for the Limiting Condition for Operation are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL CONDITION (mode) or specified condition may be made in accordance with ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through OPERATIONAL CONDITIONS (modes) required to comply with ACTION requirements or that are part of a shutdown of the plant. Exceptions to these requirements are stated in the individual specifications.

that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance requirements do not have to be performed on inoperable equipment.

D. Entry into an OPERATIONAL CONDITION (mode) shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the applicable surveillance interval or as otherwise specified. This provision shall not prevent passage through or to Operational Modes as required to comply with ACTION requirements or that are part of a shutdown of the plant.

E. When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied, the unit shall be placed in COLD SHUTDOWN within the following 24 hours. This specification is not applicable when in Cold Shutdown or Refuel Mode.

E. Surveillance Requirements for inservice testing of components shall be applicable as follows:

5.5.7

1. Inservice testing of pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(f), except where specific written relief has been granted by the NRC pursuant to 10 CFR 50, Section 50.55a(f)(6)(ii). The inservice testing and inspection program is based on an NRC approved edition of, and addenda to, Section XI of the ASME Boiler and Pressure Vessel Code which is in effect 12 months prior to the beginning of the inspection interval.

See ITS 3.8.1

F. Equipment removed from service or declared inoperable to comply with required 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.B.

See ITS Chapter 3.0

Amendment No. 83, 184, 198, 227, 241, 262

This program provides controls for inservice testing of certain ASME Code class 1, 2, and 3 pumps and valves. The program shall include the following:

A7

A8

ITS Amend 262

A1

4.0 Continued

Testing Frequencies

are as follows:

[5.5.7.a]

2. ~~Surveillance intervals~~ specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice testing activities required by the Code and applicable Addenda shall be applicable as defined in Technical Specification 1.0.T

A9

above required

[5.5.7.b]

3. The provisions of ~~Specification 4.0.D~~ are applicable to the frequencies ~~specified in Technical Specification 1.0.T~~ for performing inservice testing activities.

SR3.0.2

[5.5.7.c]

4. Performance of the above inservice testing activities shall be in addition to other specified Surveillance Requirements.

A7

[5.5.7.d]

5. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

The provisions of SR 3.0.3 are applicable to inservice testing activities.

24

CTS Amend 262

(A1)

1.0 (cont'd)

see ITS: 3.6.1.3

opened to perform necessary operational activities.

see ITS: 3.6.1.2

2. At least one door in each airlock is closed and sealed.

see ITS: 3.6.1.3

3. All automatic containment isolation valves are operable or de-activated in the isolated position.

see ITS: 3.6.4.1

All blind flanges and manways are closed. See ITS: 3.6.1.1

- N. **Rated Power** - Rated power refers to operation at a reactor power of 2,536 MWt. This is also termed 100 percent power and is the maximum power level authorized by the operating license. Rated steam flow, rated coolant flow, rated nuclear system pressure, refer to the values of these parameters when the reactor is at rated power (Reference 1).
- O. **Reactor Power Operation** - Reactor power operation is any operation with the Mode Switch in the Startup/Hot Standby or Run position with the reactor critical and above 1 percent rated thermal power.
- P. **Reactor Vessel Pressure** - Unless otherwise indicated, reactor vessel pressures listed in the Technical Specifications are those measured by the reactor vessel steam space sensor.
- Q. **Refueling Outage** - Refueling outage is the period of time between the shutdown of the unit prior to refueling and the startup of the Plant subsequent to that refueling.
- R. **Safety Limits** - The safety limits are limits within which the reasonable maintenance of the fuel cladding integrity and the reactor coolant system integrity are assured. Violation of such a limit is cause for unit shutdown and review by the Nuclear Regulatory Commission before resumption of unit operation. Operation beyond such a limit may not in itself result in serious consequences but it indicates an operational

see ITS Chapter 1.0

deficiency subject to regulatory review.
S. **Secondary Containment Integrity** - Secondary containment integrity means that the reactor building is intact and the following conditions are met:

see ITS! Chapter 1.0

- 1. At least one door in each access opening is closed.
- 2. The Standby Gas Treatment System is operable.
- 3. All automatic ventilation system isolation valves are operable or secured in the isolated position.

see ITS: 3.6.4.3

T. **Surveillance Frequency Notations / Intervals** See ITS: 3.6.4.2

The surveillance frequency notations / intervals used in these specifications are defined as follows:

[5.5.7.4]

Notations	Intervals	Frequency
D	Daily	At least once per 24 hours
W	Weekly	At least once per 7 days
M	Monthly	At least once per 31 days
Q	Quarterly or every 3 months	At least once per 92 days
SA	Semiannually or every 6 months	At least once per 184 days
A	Annually or Yearly	At least once per 366 days
18M	18 Months	At least once per 18 months (650 days)
R	Operating Cycle	At least once per 24 months (8731 days)
S/U		Prior to each reactor startup
NA		Not applicable

A9

Biennially or every 2 years

Every 9 months At least once per 276 days

ITS Amend 262

(A1)

JAFNPP

3.7 (cont'd)

4.7 (cont'd)

ITS

[5.5.8]

B. Standby Gas Treatment System

- 1. Except as specified in 3.7.B.2 below both circuits of the Standby Gas Treatment System shall be operable at all times when secondary containment integrity is required.

see ITS!
3.6.4.3

[5.5.8.d]

[5.5.8.e]

B. Standby Gas Treatment System

- 1. Standby Gas Treatment System surveillance shall be performed as indicated below:

a. Once per 24 months, it shall be demonstrated that:

- (1) Pressure drop across the combined high-efficiency and charcoal filters is less than 5.7 in. of water at 500 acfm, and

540 = E = 6600

(L3)

- (2) Each 39kW heater shall dissipate greater than 29kW of electric power as calculated by the following expression:

$$P = \sqrt{3}EI$$

where:

- P = Dissipated Electrical Power;
- E = Measured line-to-line voltage in volts (RMS);
- I = Average measured phase current in amperes (RMS).

(M2)

when tested in accordance with ASME N510 - 1975

OTS
Amend 262

M2

Section 5.5

following painting, fire, or chemical release that could adversely affect the ability of the filter system to perform the intended function

JAFNPP L1

4.7 (cont'd)

A1

RAI 5.5-2

RAI 5.5-3

RAI 5.5-2

CTS Amend 269

when tested in accordance with Sections C.5.a and C.5.c of Regulatory Guide 1.52, Revision 2, at a flow rate of 5400 to 6600 scfm

M2

[5.5.8] b.

At least once during each scheduled secondary containment leak rate test, whenever a filter is changed, whenever work is performed that could affect the filter system efficiency, and at intervals not to exceed six months between retueling/outages it shall be demonstrated that:

of 24

[5.5.8.a]

(1) The removal efficiency of the particulate filters is not less than 99 percent based on a DOP test per ANSI N101-1972 para. 4.1.

[5.5.8.b]

(2) The removal efficiency of each of the charcoal filters is not less than 99 percent based on a Freon test

[5.5.8.c] c.

At least once per 24 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire, or chemical release, that could adversely affect the ability of the charcoal to perform its intended function in any ventilation zone communicating with the system, verify:

that could affect the filter system efficiency

A13

LA4

(1) Within 31 days after removal that a laboratory test of a sample of the charcoal adsorber, when obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows methyl iodide penetration to be less than or equal to 5 percent when tested in accordance with ASTM D3803-1989 at a temperature of 30 degrees C (86 degrees F), and a relative humidity of at least 70 percent.

after

(2) Within 31 days of completing 20 hours of charcoal adsorber operation, that a laboratory test of a sample of the charcoal adsorber, when obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows

A1

JAFNPP

3.7 (cont'd)

A12

4.7 (cont'd)

add SR 3.0.2 and SR 3.0.3 applicability

See ITS 3.6.4.3

the methyl iodide penetration to be less than or equal to 5 percent when tested in accordance with ASTM D3803-1989 at a temperature of 30 degrees C [86 degrees F], and a relative humidity of at least 70 percent.

- d. Once per 24 months, automatic initiation of each branch of the Standby Gas Treatment System shall be demonstrated.
- e. Once per 24 months, manual operability of the bypass valve for filter cooling shall be demonstrated.
- f. Standby Gas Treatment System Instrumentation Calibration:

differential pressure switches	Once per 24 Months
--------------------------------	--------------------

- 2. From and after the date that one circuit of the Standby Gas Treatment System is made or found to be inoperable for any reason, the following would apply:
 - a. If in Start-up/Hot Standby, Run or Hot Shutdown mode, reactor operation or irradiated fuel handling is permissible only during the succeeding 7 days unless such circuit is sooner made operable, provided that during such 7 days all active components of the other Standby Gas Treatment Circuit shall be operable.

- 2. When one circuit of the Standby Gas Treatment System becomes inoperable, the operable circuit shall be verified to be operable immediately and daily thereafter.

CTS Amend 269

CTS Amend 269

(A1)

JAFNPP

3.11 LIMITING CONDITIONS FOR OPERATION

3.11 ADDITIONAL SAFETY RELATED PLANT CAPABILITIES

Applicability:

Applies to the operating status of the main control and relay rooms, and battery room ventilation and cooling. Applies to emergency service water system and intake deicing heaters.

Objective:

To assure the availability of the main control and relay room, and battery room ventilation systems, to assure the availability of the emergency service water system and intake deicing heaters, under the conditions for which the capability is an essential response to plant abnormalities.

A. Main Control Room Ventilation

1. The reactor shall not have a coolant temperature greater than 212 °F and fuel may not be handled unless both of the control room emergency ventilation air supply fans and fresh air filter trains are available for normal operation except that one emergency

see ITS! 3.7.3

4.11 SURVEILLANCE REQUIREMENTS

4.11 ADDITIONAL SAFETY RELATED PLANT CAPABILITIES

Applicability:

Applies to the surveillance requirements for the main control and relay room, battery room ventilation systems, emergency service water and intake deicing heaters.

Objective:

To verify the operability or availability under conditions for which these capabilities are an essential response to plant abnormalities.

A. Main Control Room Ventilation

1. Each of the control room emergency ventilation air supply fans and dampers shall be tested for operability every 3 months.

The fresh air filter trains shall be tested once every 6 months as follows:

- a. Pressure drop test across each filter and the filter system.

is less than 5.8 inches of water at a flowrate of 900 to 1100 scfm

[S.5.B.d]

see ITS! 3.7.3

L2

L7

M2

(A12)

Add SR 3.0.2 and SR 3.0.3 appl. capability

CTS Amend 269

when tested in accordance with Section C.5.a and C.5.c of Regulatory Guide 1.52, Rev 2, at a flowrate of 900 to 1100 scfm

M2
JAFNPP

Section 5.5

A1

3.11 (cont'd) See ITS 3.7.3

m2

ventilation air supply fan and/or filter may be out of service for 14 days.

when tested in accordance with Section C.5.a and C.5.d of Regulatory Guide 1.52, Rev 2, at a flowrate of 900 to 1100 scfm

[5.5.8.b]

c.

Di-~~octyl~~phthalate (DOP) test for particulate filter efficiency greater than 99% for particulate greater than 0.3 mic/on size.

CTS Insert 238-3

Freon 112 test for charcoal filter bypass as a measure of filter efficiency of at least 99.5% ~~for halogen removal.~~

2. The main control room air radiation monitor shall be operable whenever the control room emergency ventilation air supply fans and filter trains are required to be operable by 3.11.A.1 or filtration of the control room ventilation intake air must be initiated.

[5.5.8.c] 2.

At least once per 24 months or (1) after any structural maintenance on the ~~HEPA filter~~ charcoal adsorber housings, or (2) following painting, fire, or chemical release, that could adversely affect the ability of the charcoal to perform its intended function, in any ventilation zone communicating with the system, verify:

See ITS 3.3.7.1

that could affect the filter system efficiency

(1) Within 31 days after removal, that a laboratory test of a sample of the charcoal adsorber, when obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows the methyl iodide penetration to be less than or equal to 5 percent when tested in accordance with ASTM D3803-1989 at a temperature of 30 degrees C (86 degrees F), and a relative humidity of at least 95 percent.

(2) Within 31 days of completing ^{after} 720 hours of charcoal adsorber operation, that a laboratory test of a sample of the charcoal adsorber, when obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1978, shows the methyl iodide penetration to be less than or equal to 5 percent when tested in accordance with ASTM D3803-1989 at a temperature of 30 degrees C (86 degrees F), and a relative humidity of at least 95 percent.

RAI 5.5-3

RAI 5.5-2

CTS Amend 269

CTS INSERT 238-1

M2

After each complete or partial replacement of the HEPA filter; after any structural maintenance on the HEPA housing that could affect the filter system efficiency and following painting, fire, or chemical release that could adversely affect the ability of the filter system to perform the intended function in any ventilation zone communicating with the system

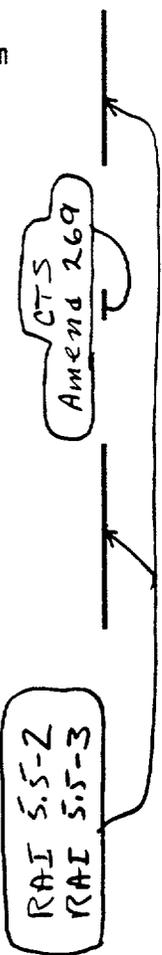
CTS INSERT 238-2

Not used.

CTS INSERT 238-3

M2

After each complete or partial replacement of the charcoal adsorber filter; after removal of a charcoal adsorber sample; after any structural maintenance on the charcoal adsorber housing that could affect the filter system efficiency and following painting, fire, or chemical release that could adversely affect the ability of the filter system to perform the intended function in any ventilation zone communicating with the system



(A1)

Amend 270

LIMITING CONDITIONS FOR OPERATION

SURVEILLANCE REQUIREMENTS

2.5 MAXIMUM ACTIVITY IN OUTSIDE TANKS

Applicability

[5.5.9.6] Applies to tanks located outdoors that do not have catch basins that drain back to the building.

Objective

To ensure that in the event of an uncontrolled release of the tank's contents, the resulting concentrations would be less than the limits of 10 CFR 20, Appendix B, Table II, Column 2, at the nearest surface water supply in an unrestricted area.

A10

Specifications

[5.5.9.6] a. The quantity of liquid radioactive material contained in a condensate storage tank or any outside temporary tank shall be limited to 10 curies, excluding Tritium and dissolved or entrained noble gases.

b. With the quantity of liquid radioactive material in a tank above this limit, reduce the tank's radioactive contents to within the limit within 48 hours; and

c. Describe the events leading to this condition in the next Semiannual Effluent Release Report.

2.5 MAXIMUM ACTIVITY IN OUTSIDE TANKS

Applicability

Applies to outdoor tanks that do not have catch basins that drain back to the building.

Objective

To ensure that the radioactivity contained in outdoor tanks is kept within applicable limits.

[5.5.9.6]

Specifications

a. The quantity of radioactive material contained in a condensate storage tank or any outside temporary tank shall be determined by analyzing a liquid sample of the tank's contents weekly when radioactive liquid is being added to the tank.

LA3

L6

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

RAI 5.5-7

JAFNPP

[5.5.13] B-21 CONFIGURATION RISK MANAGEMENT PROGRAM (CRMP)

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for which a risk-informed allowed outage time has been granted. The program is to include the following:

- a. Provisions for the control and implementation of a Level 1 at-power internal events PRA-informed methodology. The assessment is to be capable of evaluating the applicable plant configuration.
- b. Provisions for performing an assessment prior to entering the plant configuration described by the Limiting Conditions for Operation (LCO) Action Statement for preplanned activities. AI1
- c. Provisions for performing an assessment after entering the plant configuration described by the LCO Action Statement for unplanned entry into the LCO Action Statement. Condition(s)
- d. Provisions for assessing the need for additional actions after the discovery of additional equipment-out-of-service conditions while in the plant configuration described by the LCO Action Statement.
- e. Provisions for considering other applicable risk-significant contributors such as Level 2 issues and external events, qualitatively or quantitatively. and Storage Tank Radioactivity

edit

[5.5.9] E-22 OFFGAS TREATMENT SYSTEM EXPLOSIVE GAS MONITORING PROGRAM

The program provides controls for potentially explosive gas mixtures contained in the Main Condenser Offgas Treatment System.

The program shall include the limits for concentration of hydrogen and oxygen in the Main Condenser Offgas Treatment System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion). SR 3.0.2 and SR 3.0.3

[5.5.9.a]

The provisions of Specification 3.0.B and 4.0.C are applicable to the program surveillance frequencies.

M3 Explosive Gas and Storage Tank Radioactivity Monitoring

M4 and quantity of radioactivity contained in unprotected outside liquid storage tanks

M5 add 5.5.10 Diesel Fuel Oil Testing Program

add 5.5.11 Technical Specification (TS) Bases Control Program

add 5.5.12, Safety Function Determination Program (SFDP)

Amendment No. 269, 270

CTS Amend 270

CTS Amend 270

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.5

Programs and Manuals

**DISCUSSION OF CHANGES (DOCs) TO THE
CTS**

DISCUSSION OF CHANGES
ITS: 5.5 - PROGRAMS AND MANUALS

ADMINISTRATIVE CHANGES

- A1 In the conversion of the James A. FitzPatrick Nuclear Power Plant (JAFNPP), Current Technical Specifications (CTS) to the proposed plant specific Improved Technical Specifications (ITS) certain wording preferences or conventions are adopted which do not result in technical changes. Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the conventions in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4", Revision 1 (i.e., Improved Standard Technical Specifications (ISTS)).
- A2 CTS 6.17 contains the programmatic requirements for the Offsite Dose Calculation Manual (ODCM). These requirements are revised in format and content to reflect the NUREG-1433, Revision 1 format in ITS 5.5.1. Since these changes do not modify any technical requirements, they are administrative and have no adverse impact on safety.
- A3 Not Used.
- A4 Not Used.
- A5 Two changes to CTS 6.20 have been made.

CTS 6.20.D is not retained in ITS 5.5.6. ITS Section 3.0/4.0 Bases specifies that these requirements are applicable only to Limiting Conditions for Operation (LCO) and Surveillance Requirements (SR) for ITS Sections 3.1 through 3.10, unless otherwise stated. Therefore, these requirements do not apply to Administrative Controls unless otherwise stated. Therefore, it is not necessary, would be inconsistent with the stated applicability, and may be confusing, to state that CTS 4.0.B (ITS SR 3.0.2) is not applicable in the Administrative Controls Sections. This change is administrative and has no adverse impact on safety.

CTS 6.20 has also been modified by adding a reference to the prohibition of the modification of the testing Frequencies required by 10 CFR 50, Appendix J. This change is administrative, is consistent with TSTF Technical Specification Change Traveler number 52, Revision 3, and has no impact on safety.

- A6 The CTS is revised to add ITS 5.5.4, "Radioactive Effluent Controls Program." ITS 5.5.4 establishes programmatic controls to ensure compliance with applicable regulatory requirements. The program captures the existing requirements for control of radioactive effluents contained in the CTS Radiological Environmental Technical Specifications (RETS), which are proposed to be removed and relocated, consistent with Generic Letter 89-01, to the ODCM. The discussion of change for the

Editorial

RAI 5.5-1
TSTF-52, R3

DISCUSSION OF CHANGES
ITS: 5.5 - PROGRAMS AND MANUALS

ADMINISTRATIVE CHANGES

A6 (continued)

removal of RETS from the CTS is provided in the individual RETS Specifications. Since this change does not modify any technical requirements, it is administrative and has no adverse impact on safety.

A7 CTS 4.0.E.1 and 4.0.E.4 require that inservice testing (IST) of pumps and valves be performed in accordance with Section XI of the ASME Code and applicable Addenda as required by 10 CFR 50.55a, except where relief has been requested. It further requires that the program be based on an NRC approved edition of the Code, and that performance of IST activities is in addition to other specified SRs. These requirements are adequately addressed in 10 CFR 50.54, 10 CFR 50.55a, and the ASME Code, and need not be repeated in the ITS. Since this change does not modify any technical requirements, it is administrative and has no adverse impact on safety.

A8 The CTS 4.0.E is revised to adopt the programmatic description of ITS Specification 5.5.7, "Inservice Testing Program." This program captures the existing requirements for inservice testing of certain ASME Code Class 1, 2, and 3 pumps and valves as required for plants licensed prior to January 1, 1971, which are contained throughout the CTS in various SRs. These individual Surveillances are appropriately addressed to reflect this change. Since this change does not modify any technical requirements, it is administrative and has no adverse impact on safety.

A9 CTS 4.0.E.2 which specifies, inservice testing activities required by the Code and applicable Addenda shall be applicable as defined in Technical Specification 1.0.T, has been deleted. CTS 1.0.T which was used for both inservice testing (IST) and TS Surveillance intervals/notations has been deleted (see Discussion of Changes for ITS Chapter 1.0) since ITS Surveillances provide specific Frequencies (e.g., 7 days, 24 months). ITS 5.5.7.a maintains only those Surveillance Frequencies consistent with the terminology and Frequency used in the ASME Boiler and Pressure Vessel Code and applicable to the IST Program. This change is a presentation preference consistent with NUREG-1433, Revision 1, does not modify any technical requirements, and is therefore administrative only.

A10 CTS RETS 2.5, Maximum Activity in Outside Tanks, requirement has been placed in ITS 5.5.9, Explosive Gas and Storage Tank Radioactivity Monitoring Program, consistent with NUREG-1433, Revision 1. As such, CTS 6.22 (ITS 5.5.9.b) has been supplemented with a general program statement that addresses storage tank radioactivity monitoring to ensure appropriate controls of these requirements are maintained. The change

CTS Amend 270

DISCUSSION OF CHANGES
ITS: 5.5 - PROGRAMS AND MANUALS

ADMINISTRATIVE CHANGES

A10 (continued)

is considered a presentation preference only and therefore is an administrative change.

In addition, CTS RETS 2.5 contains descriptive programmatic "Objective" statements concerning the maximum quantity of radioactivity allowed in outdoor storage tanks that do not have catch basins. This objective is stated in terms of limiting the quantity of radioactivity to ensure that in the event of uncontrolled release of the contents of tanks, that certain specified limits of 10 CFR 20 would not be exceeded. CTS RETS 2.5 also contains "Specifications" which address the maximum quantity of radioactive material allowed (10 curies, excluding Tritium and dissolved or entrained noble gases) and specifies surveillance to verify that the applicable tanks' contents are within the 10 curie limit as a means of achieving the specified objective 10 CFR 20 limits.

Instead of specifying the curie limit for radioactivity in CTS RETS 2.5, the proposed ITS 5.5.9.b limits the allowed quantity of radioactivity contained in outdoor liquid storage tanks by addressing the maximum effluent concentration (excluding Tritium and dissolved or entrained noble gases) at the nearest potable water and surface water supplies beyond the site boundary in the event of uncontrolled release of the contents of the tanks. In ITS 5.5.9.b these effluent concentration limits are expressed as 10 times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001-20.2402. This change is consistent with changes made to ITS 5.5.4.b (that are based on TSTF-258, Revision 4), is considered a presentation preference only, and therefore, is an administrative change that does not have an adverse impact on safety.

- A11 CTS 6.21 contains programmatic requirements for the Configuration Risk Management Program (CRMP). The terminology has been revised to reflect the NUREG-1433, Revision 1, terminology. Since these changes do not modify any technical requirements, they are administrative and have no adverse impact on safety.
- A12 A statement of applicability has been added to CTS 4.7.B and CTS 4.11.A. ITS 5.5.8 includes a statement of applicability of ITS SR 3.0.2 and SR 3.0.3 to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in Administrative Controls chapters of the Technical Specifications. Since this change is a clarification needed to maintain provisions that would be allowed in the LCO sections of the Technical Specifications, it is considered administrative.

RAJ 5.5-7

DISCUSSION OF CHANGES
ITS: 5.5 - PROGRAMS AND MANUALS

ADMINISTRATIVE CHANGES (continued)

- A13 CTS 4.7.B.1.c and CTS 4.11.A.2 requirements to verify charcoal adsorber filter efficiency after painting, fire, or chemical release that could adversely affect the ability of the filter system to perform the intended function are being retained in ITS 5.5.8. Evaluation of the potential effect of activities such as painting, welding, or the use of chemical solvents on the efficiency of charcoal adsorber filters is addressed in plant procedures which provide conservative guidance with respect to replacement or testing of the charcoal adsorbers to ensure filter performance meets or exceeds the requirements of CST 4.7.B.1.c and CTS 4.11.A.2 as well as ITS 5.5.8. Retaining the requirements to verify charcoal adsorber efficiency after painting, fire, or chemical release that could adversely affect the ability of the filter system to perform the intended function is also consistent with the industry standards and practices discussed in the September 11, 1997 letter from J. N. Donahew (NRC) to J. G. Dewese (Entergy Operations Inc.). Retaining the requirements will have no adverse impact on safety.

RAE 5.5-2, CTS Amend
269

TECHNICAL CHANGES - MORE RESTRICTIVE

- M1 CTS 6.17.C.2 requirement, that the ODCM shall become effective upon issue following review and acceptance by the PORC, is being supplemented. The PORC review functions have been relocated to licensee controlled documents. The PORC review of ODCM control procedures will be relocated with the other review functions to licensee controlled documents. ITS 5.5.1.c.2 includes also the requirement for approval of the plant manager. This change, adds a requirement for approval by the authority responsible for the overall operation of the plant, imposes additional program controls, is consistent with NUREG-1433, Revision 1, and is considered more restrictive. This change is also consistent with TSTF Technical Specification Change Traveler number 76, Revision 1. This change has no adverse impact on safety.
- M2 CTS 4.7.B.1, Standby Gas Treatment (SGT) System, and 4.11.A.1, Main Control Room Ventilation (MCREV) System, requirements for periodic particulate and charcoal filter testing are being revised or supplemented as follows:
- CTS 4.7.B.1.a.2 requirement, to demonstrate each heater dissipates greater than 29 kW, is supplemented. ITS 5.5.8.e adds the requirement that testing be in accordance with ANSI N510-1975, which includes a new requirement that each phase current be within 5% of one another.
- CTS 4.7.B.1.b conditional requirements, for establishing when a filter requires efficiency testing, is being supplemented. ITS 5.5.8 includes

DISCUSSION OF CHANGES
ITS: 5.5 - PROGRAMS AND MANUALS

TECHNICAL CHANGES - MORE RESTRICTIVE

M2 (continued)

the new condition following painting, fire, or chemical release that could adversely affect the ability of the filter system to perform the intended function in any ventilation zone communicating with the system.

CTS 4.7.B.1.b.1 requirement, to demonstrate particulate filter efficiency based on DOP test per ANSI N101.1-1972 para. 41, is revised. ITS 5.5.8.a requirements specify, when tested in accordance with Sections C.5.a and C.5.c of Regulatory Guide 1.52, Rev 2, and at a flow rate of 5400 to 6600 scfm.

CTS 4.7.B.1.b.2 requirement, to demonstrate charcoal filter removal efficiency based on a freon test, is revised. ITS 5.5.8.b requirements specify, when tested in accordance with Sections C.5.a and C.5.d of Regulatory Guide 1.52, Rev 2, and at a flow rate of 5400 to 6600 scfm.

CTS 4.11.A.1.a requirement, to pressure drop test each filter and the filter system, is revised. ITS 5.5.8.d testing includes the requirement for the pressure drop across the filter system to be less than 5.8 inches of water at a system flowrate of 900 to 1100 scfm.

CTS 4.11.A.1.b requirement, for establishing when a HEPA filter requires efficiency testing, are supplemented. ITS 5.5.8.a includes the new conditions; after each complete or partial replacement of the HEPA filter, after any structural maintenance on the HEPA filter housing that could affect the filter system efficiency, and following painting, fire, or chemical release that could adversely affect the ability of the filter system to perform the intended function in any ventilation zone communicating with the system.

CTS 4.11.A.1.b requirement, to demonstrate the Di-octylphtalate (DOP) test for particulate filter efficiency for particulate greater than 0.3 micron, is revised. ITS 5.5.8.a requirements specify, when tested in accordance with Sections C.5.a and C.5.c of Regulatory Guide 1.52, Rev 2, and at a flow rate of 900 to 1100 scfm.

CTS 4.11.A.1.c requirements, for establishing when a charcoal adsorber filter requires efficiency testing, are supplemented. ITS 5.5.8.b includes the new conditions; after each complete or partial replacement of the charcoal adsorber filter; after removal of a charcoal adsorber sample; after any structural maintenance on the charcoal adsorber housing that could affect the filter system efficiency, and following

RAI 5.5-2

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RAE 5.5-2

RAE 5.5-2, 5.5-3

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M2 (continued)

painting, fire, or chemical release that could adversely affect the ability of the filter system to perform the intended function in any ventilation zone communicating with the system.

RAI 5.5-2
RAI 5.5-3

CTS 4.11.A.1.c requirement, to demonstrate charcoal filter halogen removal efficiency based on a freon test, is revised. ITS 5.5.8.b requirements specify, when tested in accordance with Sections C.5.a and C.5.d of Regulatory Guide 1.52, Rev 2, and at a flow rate of 900 to 1100 scfm.

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These changes impose additional HEPA and charcoal testing requirements, are consistent with NUREG-1433, Revision 1, and are considered more restrictive. In addition, consistent with the September 11, 1997 NRC letter to Entergy referred to in RAI 5.5-2, the changes which require testing due to painting, fire, or chemical release that could adversely affect the ability of the filter systems to perform the intended function, require plant procedures that address these activities. These plant procedures will restrict these activities by providing conservative administrative controls on welding, painting, the use of chemical solvents, and similar activities that potentially affect the performance of the HEPA and charcoal adsorber filter systems. These changes serve to enhance filter OPERABILITY and have no adverse impact on safety.

RAI 5.5-2

M3 The CTS is revised to adopt ITS 5.5.10, "Diesel Fuel Oil Testing Program," which establishes testing and sampling requirements, and acceptance criteria, in accordance with ASTM Standards, for both stored fuel oil and new fuel oil. ITS 5.5.10 establishes additional requirements relative to new fuel oil testing and to determine that particulate concentration for diesel fuel oil is ≤ 10 mg/l every 31 days. These new requirements are, consistent with the requirements of NUREG-1433, Revision 1, intended to ensure the quality of diesel fuel is maintained. The changes presented in TSTF Technical Specification Change Traveler number 106, Revision 1, and number 118, Revision 0, have been incorporated into the revised Improved Technical Specifications. These changes impose additional requirements on plant operations, and therefore are considered more restrictive. This change has no adverse impact on safety.

TSTF-118, R0

M4 The CTS is revised to adopt ITS 5.5.11, "Technical Specifications (TS) Bases Control Program," consistent with NUREG-1433, Revision 1. This

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TECHNICAL CHANGES - MORE RESTRICTIVE

M4 (continued)

Program provides a controlled mechanism for processing changes to the Bases of the Technical Specifications. Since no similar Specification exists, this change is more restrictive. This change implements a program which ensures that the Bases are maintained consistent with the UFSAR, and therefore has no adverse impact on safety.

M5 The CTS is revised to adopt ITS 5.5.12, "Safety Function Determination Program (SFDP)," consistent with NUREG-1433, Revision 1. This program ensures that any loss of safety function is detected and that appropriate actions are taken. Since no similar Specification exists, this change is more restrictive. This program identifies where a loss of safety function exists, and therefore has no adverse impact on safety.

M6 Additional ODCM requirements have been added to CTS 6.17. ITS 5.5.1 specifies that the ODCM will contain radioactive effluent controls and radiological environmental monitoring activities and descriptions of information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release reports. In addition expanded requirements of the ODCM identify monitoring activities and report requirements, and establish content and format for documenting licensee-initiated changes. The addition of extra requirements for information contained in and control over the ODCM makes this change more restrictive and provides assurance that appropriate controls will be applied to the CTS requirements relocated to the ODCM. This change has no adverse impact on safety.

M7 Facility Operating License 2.C.4, Systems Integrity, is revised to specifically list the systems addressed by this program. ITS 5.5.2, Primary Coolant Sources Outside Containment, specifies that the systems included are Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Reactor Water Cleanup, process sampling and Standby Gas treatment. This change imposes more rigid requirements on plant operation in that the list will be controlled through Technical Specifications, and therefore is considered to be more restrictive. This change has no adverse impact on safety.

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TECHNICAL CHANGES - LESS RESTRICTIVE (GENERIC)

LA1 The details contained in Facility Operating License No. DPR-59, paragraph 2.C(5), "Iodine Monitoring Program," are proposed to be relocated to the UFSAR. This program is required by the JAFNPP commitment to NUREG-0737, Item III.D.3-3. This program contains controls to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program is designed to minimize radiation exposure to plant personnel post-accident and has no effect on nuclear safety or the health and safety of the public. Therefore, the relocated program is not required to be in the ITS to provide adequate protection of the public health and safety. Changes to the UFSAR are controlled by the provisions of 10 CFR 50.59.

LA2 The details of CTS Table 6.10-1, the list of component cyclic or transient limits, by transient condition and number of design occurrences are proposed to be relocated to the UFSAR. ITS 5.5.5 retains the programmatic requirements to track these transient occurrences to ensure that components are maintained within design limits and provides reference to the UFSAR location of the Table. As a result, the requirements proposed to be relocated are not required to be included in the Technical Specifications to ensure the components are maintained within design limits. Therefore, the relocated requirements are not required to be in the ITS to provide adequate protection of the public health and safety. Changes to the UFSAR are controlled by the provisions of 10 CFR 50.59.

LA3 The details of CTS RETS 2.5 and 3.7 that provide limiting conditions for operation and surveillance requirements for explosive gas and storage tank radioactivity in radwaste systems are not retained in ITS and are relocated to the Technical Requirements Manual.

The requirements of ITS 5.5.9, consistent with NUREG-1433, Revision 1, are adequate to ensure the quantity of radioactive material in outside liquid storage tanks is maintained within limits, and explosive mixtures in the Main Condenser Offgas Treatment System are maintained within limits. ITS 5.5.9 provides regulatory control over the limitations and Surveillances proposed to be relocated. As a result the requirements proposed to be relocated are not required to be included in the Technical Specifications to ensure the quantity of radioactive material in outside liquid storage tanks is maintained within limits and explosive mixture in the Main Condenser Offgas Treatment System are maintained within limits. Therefore, the relocated requirements are not required to be in the ITS to provide adequate protection of the public health and safety. The TRM will be incorporated by reference into the

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LA3 (continued)

JAFNPP UFSAR at ITS implementation. Therefore, changes to the relocated requirements will be controlled by the provisions of 10 CFR 50.59.

LA4 The schedular details ("Within 31 days...") for implementing CTS 4.7.B.1.c.(1), 4.7.B.1.c.(2), 4.11.A.2.(1), and 4.11.A.2.(2) are proposed to be relocated to the Technical Requirements Manual (TRM). Proposed ITS SR 3.6.4.3.2 (SGT System filter testing in accordance with the Ventilation Filter Test Program (VFTP)), proposed ITS SR 3.7.3.2 (CREVAS System filter testing in accordance with the VFTP), and the requirements of proposed ITS 5.5.8 provide adequate regulatory controls over the schedular requirements proposed to be relocated to the TRM. As a result, the requirements proposed to be relocated are not required to be included in the Technical Specifications to ensure required ventilation filter testing is performed in a timely manner. Therefore, the details are not required to be in ITS to provide adequate protection of the public health and safety. The TRM will be incorporated by reference into the JAFNPP UFSAR at ITS implementation. Therefore, changes to the relocated requirements will be controlled by the provisions of 10 CFR 50.59.

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TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L1 The CTS 4.7.B.1.b requirement that certain SGT System filter tests be performed at a Frequency of "at least once during each scheduled secondary containment leak rate test," is not retained in ITS 5.5.8. Filter testing at a reactor building pressure of ≤ -0.25 inch water gauge, CTS 4.7.C.1.C is not necessary to ensure that the filters are appropriately tested. The deletion of the reactor building pressure requirement will not impact the validity of the test results provided the flow rate requirements in ITS 5.5.8.a and 5.5.8.b are satisfied. The flow rate requirements are adequate to ensure the testing will validate analysis assumptions relative to Standby Gas Treatment System filter efficiencies. In addition, if the in-place testing is performed during a MODE or specified condition when secondary containment is required to be Operable, then ITS SR 3.6.4.1.1 will require the reactor building pressure to be ≤ -0.25 inch water gauge. This is a relaxation of requirements, which is less restrictive. This change is acceptable, however, because the requirement still exists to perform these tests at a 24 month Frequency, and secondary containment capability testing (ability of the SGT System to maintain a vacuum in containment) is also performed at a 24 month Frequency. This change is consistent with NUREG-1433, Revision 1.

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC) (continued)

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L2 CTS 4.11.A.1 requires that the CREVAS filter bank pressure drop tests, HEPA filter in-place DOP tests, and the charcoal adsorber in-place bypass leakage tests be performed "once every 6 months."

CTS 4.7.B.1.b requires that the SGT System HEPA filter in-place DOP tests and the charcoal adsorber in-place bypass leakage tests be performed at intervals "not to exceed six months."

ITS 5.5.8 requires that these SGT System and CREVAS filter tests be performed at a Frequency of 24 months. A review of the previous performance history indicates that these Surveillances would pass at the 24 month Frequency. This is a relaxation of requirements, which is less restrictive.

Periodic testing of Engineered Safeguards filter systems and components is performed during operation to verify efficiency of components as a means of ensuring reliability. Filter bank pressure drop tests are performed to detect gross plugging of the filter media. In-place dioctylphthalate (DOP) tests for HEPA filters verify removal efficiency for particulates. In-place refrigerant bypass leakage tests verify that bypass flow around the adsorption media is minimized.

Engineered Safeguards filtration systems are normally in a standby condition, therefore gross degradation of the filter media is minimized. In-place DOP and refrigerant bypass leakage tests are also performed after each complete or partial replacement of the HEPA filter train or charcoal adsorber filter. These tests, and the charcoal adsorber laboratory efficiency tests, are also performed after any structural maintenance on the filter housings that could affect filter system efficiency, and following painting, fire, or chemical release that could adversely affect the ability of the filter system to perform the intended function in any ventilation zone communicating with the system. The charcoal adsorber laboratory efficiency test is also performed after 720 hours of filter operation. The filter system pressure drop tests are performed to detect gross plugging of the filter media. The system is normally in a standby condition, therefore gross plugging or fouling is minimized. Individual filter differential pressures are monitored during system operation. In the event of abnormal differential pressures, the cause would be investigated and the deficiency corrected.

Based on the discussion above, the redundant design of these filter trains which ensure system availability in the event of failure of one filter train, and monitoring of individual filter bank performance

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L2 (continued)

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during operation, these surveillance intervals can be safely extended to 24 months.

- L3 CTS 4.7.B.1.a.1 requires that the SGT pressure drop test be performed at a flowrate of 6,000 scfm. ITS 5.5.8.d requires that this test be performed at a flowrate of 5400 to 6600 scfm. This is a relaxation of requirements, which is less restrictive. This change is acceptable, however, because the objective of the test is to verify that there is no gross plugging of the filter media, and meeting the differential pressure acceptance criteria of < 5.7 inches wg, at a flowrate of 5400 to 6600 scfm verifies that objective. This change is consistent with NUREG-1433, Revision 1.
- L4 CTS 4.0.E specifies existing requirements for OPERABILITY testing of safety-related pumps and valves. ITS 5.5.7 specifies equivalent requirements and also provides an allowance for the application of SR 3.0.3 (CTS 4.0.C), to clarify that the allowances for Surveillance Frequency extensions do apply, since this SR is not normally applied to Frequencies identified in Administrative Controls chapters of the Technical Specifications. NRC Generic Letter 89-04 states that, if these pumps are within the Required Action range or the valves exceed the limiting full stroke time value, the associated component must be declared inoperable and the applicable Technical Specification Action(s) entered. This change, which applies SR 3.0.3 to the existing requirements, allows 24 hours to perform the required testing (or inspection) of equipment if it was not performed within the specified Frequency. The basis for this time delay includes consideration of plant conditions, the safety significance of the delay in completing the required Surveillances, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.
- L5 A statement of applicability has been added to Facility Operating License No. DPR-59, paragraph 2.C(4), which requires periodic testing and or inspections. ITS 5.5.2 includes a statement of applicability of ITS SR 3.0.2 (CTS 4.0.B) and SR 3.0.3 (CTS 4.0.C), to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in Administrative Controls chapters of the Technical Specifications. This change applies SR 3.0.2, which allows a maximum allowable extension not to exceed 25 percent of the specified Surveillance interval and SR 3.0.3, which allows 24 hours to perform the required testing (or inspection) of equipment if it was not performed within the specified Frequency, to the TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L5 (continued)

existing requirements. The use of the Surveillance interval extension

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allows for flexibility of scheduling and consideration of plant conditions. The use of the 24 hour delay period allows adequate time to complete the missed Surveillance. The basis for this time delay includes consideration of plant conditions, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillances, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. This change is considered acceptable since it applies Surveillance Requirement extensions consistent with similar system testing performed in ITS Sections 3.1 through 3.10 (e.g., SGT System, ITS LCO 3.6.4.3). In addition, this change is acceptable since the 25% extension does not significantly degrade the reliability that results from performing the Surveillance at the specified Frequency, and the 24 hour extension permits the completion of a Surveillance before complying with the required Actions or other remedial measure that might preclude completion of the Surveillance. The application of SR 3.0.2 is also consistent with TSTF-299, R0.

- L6 A statement of applicability has been added to CTS RETS 2.5. ITS 5.5.9 includes a statement of applicability of ITS SR 3.0.2 and SR 3.0.3, to clarify that the allowances for Surveillance Frequency extensions do apply, since these SRs are not normally applied to Frequencies identified in Administrative Controls chapters of the Technical Specifications. This change applies SR 3.0.2, which allows a maximum allowable extension not to exceed 25 percent of the specified Surveillance interval and SR 3.0.3, which allows 24 hours to perform the required testing (or inspection) of equipment if it was not performed within the specified Frequency, to the existing requirements. The use of the Surveillance interval extension allows for flexibility of scheduling and consideration of plant conditions. The use of the 24 hour delay period allows adequate time to complete the missed Surveillance. The basis for this time delay includes consideration of plant conditions, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillances, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. This change is considered acceptable since it applies Surveillance Requirement extensions consistent with similar system testing performed in ITS Sections 3.1 through 3.10 (e.g., SGT System, ITS LCO 3.6.4.3). In addition, this change is acceptable since the 25% extension does not significantly degrade the reliability

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L6 (continued)

that results from performing the Surveillance at the specified Frequency, and the 24 hour extension permits the completion of a

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Surveillance before complying with the required Actions or other remedial measure that might preclude completion of the Surveillance.

- L7 CTS 4.11.A.1.a requirement to perform a pressure drop test across each filter in the Main Control Room Ventilation system is being deleted. This is a relaxation of requirements. This change is acceptable since the objective of the test is to verify that there is no gross plugging of the filter media and ITS 5.5.8.d still requires an overall pressure drop of less than 5.8 inches of water at a flowrate of 900 to 1100 scfm (M2). In addition, failure to meet this requirement would identify the need to investigate the cause and initiate testing of the individual filter component pressure drops. This change, deletion of the individual filter pressure drop test, reduces operational requirements, is consistent with the requirements of NUREG-1433, Revision 1, and is considered less restrictive.

TECHNICAL CHANGES - RELOCATIONS

None

JAFNPP

IMPROVED STANDARD TECHNICAL SPECIFICATIONS (ISTS) CONVERSION

ITS: 5.5

Programs and Manuals

**NO SIGNIFICANT HAZARDS CONSIDERATION
(NSHC) FOR LESS RESTRICTIVE CHANGES**

NO SIGNIFICANT HAZARDS CONSIDERATION
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TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L1 CHANGE

New York Power Authority has evaluated the proposed Technical Specification change and has concluded that it does not involve a significant hazards consideration. Our conclusion is in accordance with the criteria set forth in 10 CFR 50.92. The bases for the conclusion that the proposed change does not involve a significant hazards consideration are discussed below.

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

The proposed change does not involve any physical alteration of plant systems, structures, or components, changes in parameters governing normal plant operation, or methods of operation. The proposed change eliminates the requirement to perform Standby Gas Treatment (SGT) System filter testing during each secondary containment leak rate test. The requirement still exists to perform these tests at a Frequency of 24 months. Since the secondary containment capability test is also performed at a Frequency of 24 months, there is no change to the technical requirements. Therefore, the proposed change does not involve an increase in the probability or consequence of an accident previously evaluated.

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

The proposed change does not involve any physical alteration of plant systems, structures, or components, changes in parameters governing normal plant operation, or methods of operation. The proposed change does not introduce any new modes of operation. This change does not alter any technical requirements. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated is not created.

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

The proposed change does not involve any physical alteration of plant systems, structures or components, changes in parameters governing normal plant operation, or methods of operation. The proposed change does not introduce any new modes of operation. There are no margins of safety related to any safety analyses that are dependent upon the proposed change. Therefore, this change does not involve a reduction in a margin of safety.

NO SIGNIFICANT HAZARDS CONSIDERATION
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TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L2 CHANGE

New York Power Authority has evaluated the proposed Technical Specification change and has concluded that it does not involve a significant hazards consideration. Our conclusion is in accordance with the criteria set forth in 10 CFR 50.92. The bases for the conclusion that the proposed change does not involve a significant hazards consideration are discussed below.

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

The proposed change does not involve any physical alteration of plant systems, structures, or components, changes in parameters governing normal plant operation, or methods of operation. The proposed change extends the surveillance Frequencies for several ESF filter tests from six months out to 24 months. The surveillance Frequency of 24 months is adequate to demonstrate the system to be operable. A review of the previous performance history indicates that these Surveillances would pass at the 24 month Frequency. Therefore, the proposed change does not involve an increase in the probability or consequence of an accident previously evaluated.

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

The proposed change does not involve any physical alteration of plant systems, structures, or components, changes in parameters governing normal plant operation, or methods of operation. The proposed change does not introduce any new modes of operation. The surveillance Frequency of 24 months is adequate to demonstrate the system to be operable. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated is not created.

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

The proposed change does not involve any physical alteration of plant systems, structures or components, changes in parameters governing normal plant operation, or methods of operation. The proposed change does not introduce any new modes of operation. There are no margins of safety related to any safety analyses that are dependent upon the proposed change. Therefore, this change does not involve a reduction in a margin of safety.

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TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L3 CHANGE

New York Power Authority has evaluated the proposed Technical Specification change and has concluded that it does not involve a significant hazards consideration. Our conclusion is in accordance with the criteria set forth in 10 CFR 50.92. The bases for the conclusion that the proposed change does not involve a significant hazards consideration are discussed below.

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

The proposed change does not involve any physical alteration of plant systems, structures, or components, changes in parameters governing normal plant operation, or methods of operation. The proposed change permits a $\pm 10\%$ tolerance on air flow during a filter bank pressure drop test. The pressure drop acceptance criteria is not altered, nor are the filter bank OPERABILITY requirements. Therefore, the proposed change does not involve an increase in the probability or consequence of an accident previously evaluated.

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

The proposed change does not involve any physical alteration of plant systems, structures, or components, changes in parameters governing normal plant operation, or methods of operation. The proposed change does not introduce any new modes of operation. OPERABILITY requirements for the filter banks are unchanged. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated is not created.

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

The proposed change does not involve any physical alteration of plant systems, structures or components, changes in parameters governing normal plant operation, or methods of operation. The proposed change does not introduce any new modes of operation. There are no margins of safety related to any safety analyses that are dependent upon the proposed change. Therefore, this change does not involve a reduction in a margin of safety.

NO SIGNIFICANT HAZARDS CONSIDERATION
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TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L4 CHANGE

New York Power Authority has evaluated the proposed Technical Specification change and has concluded that it does not involve a significant hazards consideration. Our conclusion is in accordance with the criteria set forth in 10 CFR 50.92. The bases for the conclusion that the proposed change does not involve a significant hazards consideration are discussed below.

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

This change proposes to apply the requirements of SR 3.0.3 (allowing 24 hours to perform the test if missed) to the Inservice Test Program test intervals. The proposed change does not affect the probability of an accident. The Frequency of inservice test performance is not assumed to be an initiator of any event. This change will not allow continuous operation such that a single failure will preclude the associated function from being performed. It is overly conservative to assume that systems or components are inoperable when a Surveillance Requirement is not performed. The opposite is, in fact, the case. The vast majority of the Surveillance Requirements performed demonstrate systems or components are OPERABLE. When a Surveillance Requirement is not performed within a specified interval, it is primarily a question of OPERABILITY that has not been verified by performance of the Surveillance Requirement. Therefore, the consequences of an accident previously evaluated are not increased since the most likely outcome of performing a Surveillance is demonstrating that the system or component is OPERABLE. This proposed change will not alter assumptions relative to the mitigation of an accident or transient event. This change will not have any impact on plant safety. Therefore, this change will 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 evaluated?

The proposed change does not involve any physical alteration of plant systems, structures, or components or changes in parameters governing normal plant operation. The changes in methods governing normal plant operation are consistent with the current safety analysis assumptions. Therefore, this change will not create the possibility of a new or different type of accident from any accident previously evaluated.

NO SIGNIFICANT HAZARDS CONSIDERATION
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TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L4 CHANGE

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

The proposed change does not involve any physical alteration of plant systems, structures, or components or changes in parameters governing normal plant operation. This change proposes to apply the requirements of SR 3.0.3 (allowing 24 hours to perform the test if missed) to the Inservice Test Program test intervals. The margin of safety is not reduced because of this change. This is based on the recognition that the most probable result of any particular Surveillance being performed is demonstrating the system or component is OPERABLE. In addition, this change provides the benefit of avoiding plant transients by allowing for performance of the missed Surveillance in an orderly manner. This proposed change has no effect on the assumptions of the design basis accident. The safety analysis assumptions will still be maintained, thus no question of safety exists. Therefore, this change does not involve a significant reduction in a margin of safety.

NO SIGNIFICANT HAZARDS CONSIDERATION
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TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L5 CHANGE

New York Power Authority has evaluated the proposed Technical Specification change and has concluded that it does not involve a significant hazards consideration. Our conclusion is in accordance with the criteria set forth in 10 CFR 50.92. The bases for the conclusion that the proposed change does not involve a significant hazards consideration are discussed below.

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

This change proposes to apply the requirements of SR 3.0.2 (allowing an extension of 1.25 times the Surveillance interval) and SR 3.0.3 (allowing 24 hours to perform the test if missed) to the Primary Coolant Sources Outside Containment Program test intervals. The proposed change does not affect the probability of an accident. The Frequency of the test performance is not assumed to be an initiator of any event. This change will not allow continuous operation such that a single failure will preclude the associated function from being performed. It is overly conservative to assume that systems or components are inoperable when a Surveillance Requirement is not performed. The opposite is, in fact, the case. The vast majority of the Surveillance Requirements performed demonstrate systems or components are OPERABLE. When a Surveillance Requirement is not performed within a specified interval, it is primarily a question of OPERABILITY that has not been verified by performance of the Surveillance Requirement. Therefore, the consequences of an accident previously evaluated are not increased since the most likely outcome of performing a Surveillance is demonstrating that the system or component is OPERABLE. This proposed change will not alter assumptions relative to the mitigation of an accident or transient event. This change will not have any impact on plant safety. Therefore, this change will 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 evaluated?

This change will not physically alter the plant (no new or different type of equipment will be installed). The changes in methods governing normal plant operation are consistent with the current safety analysis assumptions. Therefore, this change will not create the possibility of a new or different type of accident from any accident previously evaluated.

NO SIGNIFICANT HAZARDS CONSIDERATION
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TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L5 CHANGE

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

This change proposes to apply the requirements of SR 3.0.2 (allowing an extension of 1.25 times the Surveillance Interval) and SR 3.0.3 (allowing 24 hours to perform the test if missed) to the Primary Coolant Sources Outside Containment Program test intervals. The margin of safety is not reduced because of this change. This is based on the recognition that the most probable result of any particular Surveillance being performed is demonstrating the system or component is OPERABLE. In addition, this change provides the benefit of avoiding plant transients by allowing Surveillance scheduling to take into consideration plant conditions, provide for adequate planning, and allow for performance of the Surveillance in an orderly manner. This proposed change has no effect on the assumptions of the design basis accident. The safety analysis assumptions will still be maintained, thus no question of safety exists. Therefore, this change does not involve a significant reduction in a margin of safety.

NO SIGNIFICANT HAZARDS CONSIDERATION
ITS: 5.5 - PROGRAMS AND MANUALS

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L6 CHANGE

New York Power Authority has evaluated the proposed Technical Specification change and has concluded that it does not involve a significant hazards consideration. Our conclusion is in accordance with the criteria set forth in 10 CFR 50.92. The bases for the conclusion that the proposed change does not involve a significant hazards consideration are discussed below.

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

This change proposes to apply the requirements of SR 3.0.2 (allowing an extension of 1.25 times the Surveillance interval) and SR 3.0.3 (allowing 24 hours to perform the test if missed) to the Explosive Gas and Storage Tank Radioactivity Monitoring Program and test intervals. The proposed change does not affect the probability of an accident. The Frequency of the test performance is not assumed to be an initiator of any event. This change will not allow continuous operation such that a single failure will preclude the associated function from being performed. It is overly conservative to assume that systems or components are inoperable when a Surveillance Requirement is not performed. The opposite is, in fact, the case. The vast majority of the Surveillance Requirements performed demonstrate systems or components are OPERABLE. When a Surveillance Requirement is not performed within a specified interval, it is primarily a question of OPERABILITY that has not been verified by performance of the Surveillance Requirement. Therefore, the consequences of an accident previously evaluated are not increased since the most likely outcome of performing a Surveillance is demonstrating that the system or component is OPERABLE. This proposed change will not alter assumptions relative to the mitigation of an accident or transient event. This change will not have any impact on plant safety. Therefore, this change will 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 evaluated?

This change will not physically alter the plant (no new or different type of equipment will be installed). The changes in methods governing normal plant operation are consistent with the current safety analysis assumptions. Therefore, this change will not create the possibility of a new or different type of accident from any accident previously evaluated.

NO SIGNIFICANT HAZARDS CONSIDERATION
ITS: 5.5 - PROGRAMS AND MANUALS

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L6 CHANGE (continued)

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

This change proposes to apply the requirements of SR 3.0.2 (allowing an extension of 1.25 times the Surveillance Interval) and SR 3.0.3 (allowing 24 hours to perform the test if missed) to the Explosive Gas and Storage Tank Radioactivity Monitoring Program test intervals. The margin of safety is not reduced because of this change. This is based on the recognition that the most probable result of any particular Surveillance being performed is demonstrating the system or component is OPERABLE. In addition, this change provides the benefit of avoiding plant transients by allowing Surveillance scheduling to take into consideration plant conditions, provide for adequate planning, and allow for performance of the Surveillance in an orderly manner. This proposed change has no effect on the assumptions of the design basis accident. The safety analysis assumptions will still be maintained, thus no question of safety exists. Therefore, this change does not involve a significant reduction in a margin of safety.

NO SIGNIFICANT HAZARDS CONSIDERATION
ITS: 5.5 - PROGRAMS AND MANUALS

TECHNICAL CHANGES - LESS RESTRICTIVE (SPECIFIC)

L7 CHANGE

New York Power Authority has evaluated the proposed Technical Specification change and has concluded that it does not involve a significant hazards consideration. Our conclusion is in accordance with the criteria set forth in 10 CFR 50.92. The bases for the conclusion that the proposed change does not involve a significant hazards consideration are discussed below.

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

The proposed change does not involve any physical alteration of plant systems, structures, or components, changes in parameters governing normal plant operation, or methods of operation. The control room emergency ventilation air supply system is not assumed to be the initiator of any analyzed event. Therefore, this change will not increase the probability of an accident previously evaluated. The proposed change deletes the requirement to perform a pressure drop test across each filter in the Main Control Room Ventilation system. Since the overall pressure drop test is retained, the pressure drop acceptance criteria is not altered, and the filter bank OPERABILITY requirements remain, the proposed change does not involve an increase in the 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 evaluated?

The proposed change does not involve any physical alteration of plant systems, structures, or components, changes in parameters governing normal plant operation, or methods of operation. The proposed change does not introduce any new modes of operation. Since the overall pressure drop test is retained, the pressure drop acceptance criteria is not altered, and the filter bank OPERABILITY requirements remain, the possibility of a new or different kind of accident from any accident previously evaluated is not created.

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

The proposed change does not involve any physical alteration of plant systems, structures or components, changes in parameters governing normal plant operation, or methods of operation. The proposed change does not introduce any new modes of operation. There are no margins of safety related to any safety analyses that are dependent upon the proposed change. Therefore, this change does not involve a reduction in a margin of safety.