September 28, 1988

Docket No. 50-354

Mr. Steven E. Miltenberger Vice President and Chief Nuclear Officer Public Service Electric & Gas Company Post Office Box 236 Hancocks Bridge, New Jersey 08038

Dear Mr. Miltenberger

SUBJECT: (TAC NO. 68101) TECHNICAL SPECIFICATIONS 3.0 AND 4.0

Re: HOPE CREEK GENERATING STATION

The Commission has issued the enclosed Amendment No. 19 to Facility Operating License No. NPF-57 for the Hope Creek Generating Station. This amendment consists of changes to the Technical Specifications (TSs) in response to your application dated April 28, 1988.

This amendment would revise the Applicability of Limiting Conditions for Operation and the Applicability of Surveillance Requirements as specified by Technical Specifications 3.04, 4.03 and 4.04.

A copy of our safety evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register notice.

Sincerely,

/S/

George Rivenbark, Project Manager Project Directorate I-2 Division of Reactor Projects I/II Office of Nuclear Reactor Regulation





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

September 28, 1988

Docket No. 50-354

Mr. Steven E. Miltenberger
Vice President and Chief Nuclear
Officer
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Post Office Box 236
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George Rivenbark, Project Manager Project Directorate I-2 Division of Reactor Projects I/II Office of Nuclear Reactor Regulation

Enclosures: 1. Amendment No. 19 to License No. NPF-57 2. Safety Evaluation

cc w/enclosures: See next page Mr. Steven E. Miltenberger Public Service Electric & Gas Co.

cc:

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M. J. Wetterhahn, Esquire Conner & Wetterhahn Suite 1050 1747 Pennsylvania Avenue Washington, D.C. 20006

R. Fryling, Jr., Esquire Law Department - Tower 5E 80 Park Place Newark, New Jersey 07101

Resident Inspector U.S. Nuclear Regulatory Commission P.O. Box 241 Hancocks Bridge, New Jersey 08038

Mr. S. LaBruna General Manager - Hope Creek Operations Hope Creek Generating Station P.O. Box 118 Hancocks Bridge, New Jersey 08038

Mr. B. A. Preston, Manager Licensing and Regulation Nuclear Department P.O. Box 236 Hancocks Bridge, New Jersey 08038

Regional Administrator, Region I U.S. Nuclear Regulatory Commission 475 Allendale Road King of Prussia, Pennsylvania 19406

Mr. David M. Scott, Chief Bureau of Nuclear Engineering Division of Environmental Quality Department of Environmental Protection State of New Jersey CN 411 Trenton, New Jersey 08625 Hope Creek Generating Station



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

PUBLIC SERVICE ELECTRIC & GAS COMPANY

ATLANTIC CITY ELECTRIC COMPANY

DOCKET NO. 50-354

HOPE CREEK GENERATING STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 19 License No. NPF-57

- 1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment filed by the Public Service Electric & Gas Company (PSE&G) dated April 28, 1988 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
- Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. NPF-57 is hereby amended to read as follows:
 - (2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 19, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. PSE&G shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

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3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/S/

Walter R. Butler, Director Project Directorate I-2 Division of Reactor Projects I/II Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: September 28, 1988



3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

utter list

Walter R. Butler, Director Project Directorate I-2 Division of Reactor Projects I/II Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

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Date of Issuance: September 28, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 19

FACILITY OPERATING LICENSE NO. NPF-57

DOCKET NO. 50-354

Replace the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change. Overleaf pages provided to maintain document completeness.*

Remove	Inse	ert
3/4 0-1	3/4	0-1
3/4 0-2	3/4	0-2
3/4_0-3	3/4	0-3
3/4 1-15*	3/4	1-15*
3/4 1-16	3/4	1-16
3/4 3-35	3/4	3-35
3/4 3-36*	3/4	3-36*
3/4 3-57*	3/4	3-57*
3/4 3-58	3/4	3-58
3/4 3-67*	3/4	3-67*
3/4 3-68	3/4	3-68
3/4 3-71	3/4	3-71
3/4 3-72*	3/4	3-72*
3/4 3-85*	3/4	3-85*
3/4 3-86	3/4	3-86
3/4 3-89	3/4	3-89
3/4 3-89a	3/4	3-89a*
3/4_3-90	3/4	3-90 -
3/4 3-91	3/4	3-91
3/4 3-92*	3/4	3-92*
3/4 3-95*	3/4	3-95*
3/4 3-96	3/4	3-96
3/4 3-103	3/4	3-103
3/4 3-104	3/4	3-104*

Re

2	-	
2	-	

Remove	Insert
3/4 4-27	3/4 4-27
3/4 4-28*	3/4 4-28*
3/4_4-29	3/4 4-29
3/4 7-19	3/4 7-19
3/4 7-20*	3/4 7-20*
3/4 9-17*	3/4 9-17*
3/4 9-18	3/4 9-18
3/4 11-5	3/4 11-5
3/4 11-6	3/4 11-6
3/4 11-7	3/4 11-7
3/4 11-8	3/4 11-8*
3/4 11-11*	3/4 11-11*
3/4 11-12	3/4 11-12
3/4 11-13	3/4 11-13
3/4 11-14	3/4 11-14
3/4 11-15	3/4 11-15
3/4 11-16	3/4 11-16
3/4 11-17*	3/4 11-17*
3/4 11-18	3/4 11-18
3/4 11-19	3/4 11-19
3/4 11-20	3/4 11-20
3/4 12-1*	3/4 12-1*
3/4 12-2	3/4 12-2
3/4 12-13	3/4 12-13
3/4 12-14	3/4 12-14
B 3/4 0-1	B 3/4 0-1
B 3/4 0-2	B 3/4 0-2
B 3/4 0-3	B 3/4 0-3 B 3/4 0-4
-	B 3/4 0-5 B 3/4 0-6

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LIMITING CONDITION FOR OPERATION

3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding Specifications is required during the OPERATIONAL CONDITIONS or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.

3.0.2 Noncompliance with a Specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the Action requirements is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in an OPERATIONAL CONDITION in which the Specification does not apply by placing it, as applicable, in:

- 1. At least STARTUP within the next 6 hours,
- 2. At least HOT SHUTDOWN within the following 6 hours, and
- 3. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications.

This Specification is not applicable in OPERATIONAL CONDITIONS 4 or 5.

3.0.4 Entry into an OPERATIONAL CONDITION 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 or other specified condition may be made in accordance with the 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 or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual Specifications.

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified time interval with:

- a. A maximum allowable extension not to exceed 25% of the surveillance interval, but
- b. The combined time interval for any 3 consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval.

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified 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.

4.0.4 Entry into an OPERATIONAL CONDITION or other specified applicable condition 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 CONDITIONS as required to comply with ACTION requirements.

4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, & 3 components shall be applicable as follows:

- Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 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(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g) (6) (i).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and

APPLICABILITY

SURVEILLANCE REQUIREMENTS (Continued)

Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities

Weekly Monthly Quarterly or every 3 months Semiannually or every 6 months Every 9 months Yearly or annually Required frequencies for performing inservice inspection and testing activities

At least once per 7 days At least once per 31 days At least once per 92 days At least once per 184 days At least once per 276 days At least once per 366 days

- c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities.
- d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.
- e. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

REACTIVITY CONTROL SYSTEMS

CONTROL ROD DRIVE HOUSING SUPPORT

LIMITING CONDITION FOR OPERATION

3.1.3.8 The control rod drive housing support shall be in place.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

ACTION:

With the control rod drive housing support not in place, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.1.3.8 The control rod drive housing support shall be verified to be in place by a visual inspection prior to startup any time it has been disassembled or when maintenance has been performed in the control rod drive housing support area.

REACTIVITY CONTROL SYSTEMS

3/4.1.4 CONTROL ROD PROGRAM CONTROLS

ROD WORTH MINIMIZER

LIMITING CONDITION FOR OPERATION

3.1.4.1 The rod worth minimizer (RWM) shall be OPERABLE.

<u>APPLICABILITY</u>: OPERATIONAL CONDITIONS 1 and $2^{*\#}$, when THERMAL POWER is less than or equal to 20% of RATED THERMAL POWER, the minimum allowable low power setpoint.

ACTION:

a. With the RWM inoperable, verify control rod movement and compliance with the prescribed control rod pattern by a second licensed operator or other technically qualified member of the unit technical staff who is present at the reactor control console. Otherwise, control rod movement may be only by actuating the manual scram or placing the reactor mode switch in the Shutdown position.

SURVEILLANCE REQUIREMENTS

4.1.4.1 The RWM shall be demonstrated OPERABLE:

- a. In OPERATIONAL CONDITION 2 within 8 hours prior to withdrawal of control rods for the purpose of making the reactor critical, and in OPERATIONAL CONDITION 1 within 8 hours prior to RWM automatic initiation when reducing THERMAL POWER, by verifying proper indication of the selection error of at least one out-of-sequence control rod.
- b. In OPERATIONAL CONDITION 2 within 8 hours prior to withdrawal of control rods for the purpose of making the reactor critical, by verifying the rod block function by demonstrating inability to withdraw an out-of-sequence control rod.
- c. In OPERATIONAL CONDITION 1 within one hour after RWM automatic initiation when reducing THERMAL POWER, by verifying the rod block function by demonstrating inability to withdraw an out-of-sequence control rod.
- d. By verifying that the control rod patterns and sequence input to the RWM computer are correctly loaded following any loading of the program into the computer.

#See Special Test Exception 3.10.2.

Entry into OPERATIONAL CONDITION 2 and withdrawal of selected control rods is permitted for the purpose of determining the OPERABILITY of the RWM prior to withdrawal of control rods for the purpose of bringing the reactor to criticality.

TABLE 3.3.3-1 (Continued)

EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION

ACTION

ACTION 30 -With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement: With one channel inoperable, place the inoperable channel а. in the tripped condition within one hour or declare the associated system inoperable. Ь. With more than one channel inoperable, declare the associated system inoperable. ACTION 31 -With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, declare the associated ECCS inoperable. ACTION 32 -With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, place the inoperable channel in the tripped condition within one hour. ACTION 33 -With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, restore the inoperable channel to OPERABLE status within 8 hours or declare the associated ECCS inoperable. ACTION 34 -With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement: For one channel inoperable, place the inoperable channel а. in the tripped condition within 1 hour or declare the HPCI | system inoperable. b. With more than one channel inoperable, declare the HPCI system inoperable. ACTION 35 -With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, place at least one inoperable channel in the tripped condition within one hour or declare the HPCI system inoperable. ACTION 36 -With the number of OPERABLE channels one less than the Total Number of Channels, place the inoperable channel in the tripped condition within 1 hour; operation may then continue until performance of the next required CHANNEL FUNCTIONAL TEST. ACITON 37 -With the number of OPERABLE channels less than required by the Minimum OPERABLE channels per Trip Function requirement, open the minimum flow bypass valve within one hour. Restore the inoperable channel to OPERABLE status within 7 days or declare

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the associated ECCS inoperable.

TABLE 3.3.3-2

EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION SETPOINTS ALLOWABLE TRIP FUNCTION **TRIP SETPOINT** VALUE CORE SPRAY SYSTEM 1. Reactor Vessel Water Level - Low Low Low. Level 1 >-129 inches* **a**. >-136 inches Drywell Pressure - High < 1.68 psig b. < 1.88 psig Reactor Vessel Pressure - Low **C**. 461 Dsia < 481 psig and > 441 psig d. Core Spray Pump Discharge Flow - Low (Bypass) > 775 gpm > 650 gpm Core Spray Pump Start Time Delay - Normal Power e. 10 seconds > 9 seconds and **<** 11 seconds Core Spray Pump Start Time Delay - Emergency Power 6 seconds f. > 5 seconds and $\overline{\langle}$ 7 seconds Manual Initiation g. NA ÑA 2. LOW PRESSURE COOLANT INJECTION MODE OF RHR SYSTEM Reactor Vessel Water Level - Low Low Low, Level 1 a. >-129 inches* >-136 inches Drywell Pressure - High **b**. ₹ 1.68 psig < 1.88 psig Reactor Vessel Pressure - Low (Permissive) C. 450 psig < 460 psig and > 440 psia LPCI Pump Discharge Flow - Low (Bypass) **d**. > 1250 gpm > 1100 gpm LPCI Pump Start Time Delay - Normal Power e. 5 seconds > 4 seconds and $\overline{<}$ 6 seconds Manual Initiation f. NA ŇA 3. HIGH PRESSURE COOLANT INJECTION SYSTEM Reactor Vessel Water Level - (Low Low, Level 2) 8. >-38 inches* >-45 inches Drywell Pressure - High < 1.68 psig b. < 1.88 psia Condensate Storage Tank Level - Low C. $\overline{>}$ 22,558 gallons > 19,174 gallons Suppression Pool Water Level - High **d**. < 78.5 inches < 80.3 inches e. Reactor Vessel Water Level - High, Level 8 < 54 inches</pre> ₹ 61 inches HPCI Pump Discharge Flow - Low (Bypass) > 550 gpm f. **>** 500 gpm Manual Initiation ÑA a. ÑA

HOPE CREEK

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TABLE 3.3.6-1

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	CONTROL	ROD BLOCK INSTRUMENT	ATION	
TRI	P FUNCTION	MINIMUM OPERABLE CHANNELS PER TRIP FUNCTION	APPLICABLE OPERATIONAL CONDITIONS	ACTION
1	ROD BLOCK MONITOR(a)			
••	a. Upscale	2	1*	60
	b. Inoperative	2	Ĩ*	60
	c. Downscale	2	1*	60
2	ADRM			
- •	a. Flow Biased Neutron Flux -			
	Upscale	4	1	61
	b. Inoperative	4	1, 2, 5	61
	c. Downscale	4	1	61
	d. Neutron Flux - Upscale, Startup	4	2, 5	61
3.	SOURCE RANGE MONITORS			
	a. Detector not full in ^(b)	3	2	61
		2	5	61
	(c)	3	2	61
	D. Upscale ¹	2	5	61
		3	2	61
	c. Inoperative	2	5	61
	(d)	3	2	61
	a. vownscale	2	5	61
4.	INTERMEDIATE RANGE MONITORS			
	a. Detector not full in	6	2, 5	61
	b. Upscale	6	2, 5	61
	c. Inoperatiye	6	2, 5	61
	d. Downscale ^(e)	6	2, 5	61
5.	SCRAM DISCHARGE VOLUME			
•••	a. Water Level-High (Float Switch)	2	1, 2, 5**	62
£	DEACTOD COOLANT SYSTEM DECTORINATION			
D .	A HOCCE A	2	1	62
	a. upscare h Inonerative	2	ī	62
	c Comparator	2	ī	62
		-	_	
7.	REACTOR MODE SWITCH SHUTDOWN POSITI	ON 2	3, 4	63

TABLE 3.3.6-1 (Continued)

CONTROL ROD BLOCK INSTRUMENTATION

ACTION

- ACTION 60 Declare the RBM inoperable and take the ACTION required by Specification 3.1.4.3.
- ACTION 61 With the number of OPERABLE Channels:
 - a. One less than required by the Minimum OPERABLE Channels per Trip Function requirement, restore the inoperable channel to OPERABLE status within 7 days or place the inoperable channel in the tripped condition within the next hour.
 - b. Two or more less than required by the Minimum OPERABLE Channels per Trip Function requirement, place at least one inoperable channel in the tripped condition within one hour.
- ACTION 62 With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, place the inoperable channel in the tripped condition within one hour.
- ACTION 63 With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip Function requirement, initiate a rod block.

NOTES

- * With THERMAL POWER > 30% of RATED THERMAL POWER.
- ** With more than one control rod withdrawn. Not applicable to control rods removed per Specification 3.9.10.1 or 3.9.10.2.
- a. The RBM shall be automatically bypassed when a peripheral control rod is selected.
- b. This function shall be automatically bypassed if detector count rate is
 > 100 cps or the IRM channels are on range 3 or higher.
- c. This function shall be automatically bypassed when the associated IRM channels are on range 8 or higher.
- d. This function shall be automatically bypassed when the IRM channels are on range 3 or higher.
- e. This function shall be automatically bypassed when the IRM channels are on range 1.

TABLE 4.3.7.1-1 (Continued)

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RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

TABLE NOTATION

#With fuel in the new fuel storage vault.
##With fuel in the spent fuel storage pool.
 *When irradiated fuel is being handled in the secondary containment.
 **When the offgas treatment system is operating.

SEISMIC MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.7.2 The seismic monitoring instrumentation shown in Table 3.3.7.2-1 shall be OPERABLE.

APPLICABILITY: At all times.

ACTION:

- a. With one or more of the above required seismic monitoring instruments inoperable for more than 30 days, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the instrument(s) to OPERABLE status.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.7.2.1 Each of the above required seismic monitoring instruments shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL FUNC-TIONAL TEST and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.7.2-1.

4.3.7.2.2 Each of the above required seismic monitoring instruments actuated during a seismic event greater than or equal to 0.01g shall be restored to OPERABLE status within 24 hours and a CHANNEL CALIBRATION performed within 5 days following the seismic event. Data shall be retrieved from actuated instruments and analyzed to determine the magnitude of the vibratory ground motion. A Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 10 days describing the magnitude, frequency spectrum and resultant effect upon unit features important to safety.

METEOROLOGICAL MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.7.3 The meteorological monitoring instrumentation channels shown in Table 3.3.7.3-1 shall be OPERABLE.

APPLICABILITY: At all times.

ACTION:

- a. With one or more of the required meteorological monitoring instrumentation channels inoperable for more than 7 days, in lieu of any other report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the instrumentation to OPERABLE status.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.7.3 Each of the above required meteorological monitoring instrumentation channels shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3.7.3-1.

TABLE 3.3.7.3-1

1

METEOROLOGICAL MONITORING INSTRUMENTATION

INSTRUMENT	MINIMUM INSTRUMEN OPERABL	TS E
a. Wind Speed		
1. Elev. 33 ft	t. 1	
2. Elev. 150 f	ft. 1	
b. Wind Direction		
1. Elev. 30 ft	t. 1	
2. Elev. 150 1	ft. 1	
c. Air Temperature	Difference	
1. Elev. 150-3	33 ft. 1	

TABLE 3.3.7.5-1

ACCIDENT MONITORING INSTRUMENTATION

	<u>KOMEN I</u>	OF CHANNELS	<u>OPERABLE</u>	DPERATIONAL CONDITIONS	ACTION
1.	Reactor Vessel Pressure	2	1	1,2,3	80
2.	Reactor Vessel Water Level	2	1	1.2.3	80
3.	Suppression Chamber Water Level	2	1	1.2.3	80
4.	Suppression Chamber Water Temperature*	2	2	1.2.3	$\frac{1}{80}(a)$
5.	Suppression Chamber Pressure	2	1	1.2.3	80
6.	Drywell Pressure	2	1	1,2,3	80
7.	Drywell Air Temperature	2	1	1.2.3	80
8.	Primary Containment Hydrogen/Oxygen Concentration				
	Analyzer and Monitor	2	1	1,2,3	80
9.	Safety/Relief Valve Position Indicators ^(C)	2/valve**	1/valve**	1,2,3	80
10.	Drywell Atmosphere Post-Accident Radiation Monitor	2	1	1,2,3	81
11.	North Plant Vent Radiation Monitor#	1	1	1.2.3	81
12.	South Plant Vent Radiation Monitor#	1	1	1.2.3	81
13.	FRVS Vent Radiation Monitor#	1	1	1.2.3	81
14.	Primary Coptainment Isolation Valve Position				
	Indication	2/valve	1/valve	1,2,3	82
	 1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 	 Reactor Vessel Pressure Reactor Vessel Water Level Suppression Chamber Water Level Suppression Chamber Water Temperature* Suppression Chamber Pressure Drywell Pressure Drywell Air Temperature Primary Containment Hydrogen/Oxygen Concentration Analyzer and Monitor Safety/Relief Valve Position Indicators^(C) Drywell Atmosphere Post-Accident Radiation Monitor North Plant Vent Radiation Monitor# South Plant Vent Radiation Monitor# FRVS Vent Radiation Monitor# Primary Containment Isolation Valve Position Indication 	1. Reactor Vessel Pressure 2 2. Reactor Vessel Water Level 2 3. Suppression Chamber Water Level 2 4. Suppression Chamber Water Temperature* 2 5. Suppression Chamber Pressure 2 6. Drywell Pressure 2 7. Drywell Air Temperature 2 8. Primary Containment Hydrogen/Oxygen Concentration Analyzer and Monitor 2 9. Safety/Relief Valve Position Indicators ^(C) 2/valve** 10. Drywell Atmosphere Post-Accident Radiation Monitor 2 11. North Plant Vent Radiation Monitor# 1 12. South Plant Vent Radiation Monitor# 1 13. FRVS Vent Radiation Monitor# 1 14. Primary Containment Isolation Valve Position Indication 2/valve	1. Reactor Vessel Pressure 2 1 2. Reactor Vessel Water Level 2 1 3. Suppression Chamber Water Level 2 1 4. Suppression Chamber Water Temperature* 2 2 5. Suppression Chamber Pressure 2 1 6. Drywell Pressure 2 1 7. Drywell Air Temperature 2 1 8. Primary Containment Hydrogen/Oxygen Concentration Analyzer and Monitor 2 1 9. Safety/Relief Valve Position Indicators ^(C) 2/valve** 1/valve** 10. Drywell Atmosphere Post-Accident Radiation Monitor 2 1 11. North Plant Vent Radiation Monitor# 1 1 12. South Plant Vent Radiation Monitor# 1 1 13. FRVS Vent Radiation Monitor# 1 1 14. Primary Containment Isolation Valve Position Indication 2/valve 1/valve	1.Reactor Vessel Pressure211,2,32.Reactor Vessel Water Level211,2,33.Suppression Chamber Water Level211,2,34.Suppression Chamber Water Temperature*221,2,35.Suppression Chamber Pressure211,2,36.Drywell Pressure211,2,37.Drywell Air Temperature211,2,38.Primary Containment Hydrogen/Oxygen Concentration Analyzer and Monitor211,2,39.Safety/Relief Valve Position Indicators(C) Drywell Atmosphere Post-Accident Radiation Monitor211,2,310.Drywell Atmosphere Post-Accident Radiation Monitor211,2,311.North Plant Vent Radiation Monitor#111,2,312.South Plant Vent Radiation Monitor#111,2,313.FRVS Vent Radiation Monitor#111,2,314.Primary Containment Isolation Valve Position Indication2/valve1/valve1,2,3

#High range noble gas monitors.

*Average bulk pool temperature.

**Acoustic monitoring and tail pipe temperature.

(a)Suppression chamber water temperature instrumentation must satisfy the availability requirements specified in Specification 3.6.2.1.

(b)One channel consists of the open limit switch, and the other channel consists of the closed limit switch.

(C)The acoustic monitor for FO13H SRV may be inoperable until September 21, 1987 or until the first forced outage of sufficient duration to effect repair prior to that date without applying the shutdown requirement of ACTION 80(a).

Effective

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Table 3.3.7.5-1 (Continued)

ACCIDENT MONITORING INSTRUMENTATION ACTION STATEMENTS

ACTION 80 -

- a. With the number of OPERABLE accident monitoring instrumentation channels less than the Required Number of Channels shown in Table 3.3.7.5-1, restore the inoperable channel(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. With the number of OPERABLE accident monitoring instrumentation channels less than the Minimum Channels OPERABLE requirements of Table 3.3.7.5-1, restore the inoperable channel(s) to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- ACTION 81 With the number of OPERABLE accident monitoring instrumentation channels less than required by the Minimum Channels OPERABLE requirement, either restore the inoperable channel(s) to OPERABLE status within 72 hours, or:
 - a. Initiate the preplanned alternate method of monitoring the appropriate parameter(s), and
 - b. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

ACTION 82 -

- a. With the number of OPERABLE accident monitoring instrumentation channels less than the Required Number of Channels shown in Table 3.3.7.5-1, verify the valve(s) position by use of alternate indication methods; restore the inoperable channel(s) to OPERABLE status within 30 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.
- b. With the number of OPERABLE accident monitoring instrumentation channels less than the Minimum Channels OPERABLE requirements of Table 3.3.7.5-1, verify the valve(s) position by use of alternate indication methods; restore the inoperable channel(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

TRAVERSING IN-CORE PROBE SYSTEM

LIMITING CONDITION FOR OPERATION

- 3.3.7.7. The traversing in-core probe system shall be OPERABLE with:
 - a. Five movable detectors, drives and readout equipment to map the core, and
 - b. Indexing equipment to allow all five detectors to be calibrated in a common location.

APPLICABILITY: When the traversing in-core probe is used for:

- a. Recalibration of the LPRM detectors, and
- b.* Monitoring the APLHGR, LHGR, MCPR, or MFLPD.

ACTION:

With the traversing in-core probe system inoperable, suspend use of the system for the above applicable monitoring or calibration functions. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.7.7 The traversing in-core probe system shall be demonstrated OPERABLE by normalizing each of the above required detector outputs within 72 hours prior to use for the LPRM calibration function.

^{*}Only the detector(s) in the required measurement location(s) are required to be OPERABLE.

LIMITING CONDITION FOR OPERATION

3.3.7.8

The material originally contained in Section 3/4.3.7.8 was deleted with the issuance of the Full Power License. However, to maintain numerical continuity between the succeeding sections and existing station procedural references to those Technical Specifications Sections, 3/4.3.7.8 has been intentionally left blank.

LOOSE-PART DETECTION SYSTEM

LIMITING CONDITION FOR OPERATION

3.3.7.9 The loose-part detection system shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1 and 2.

ACTION:

- a. With one or more loose-part detection system channels inoperable for more than 30 days, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 10 days outlining the cause of the malfunction and the plans for restoring the channel(s) to OPERABLE status.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.7.9 Each channel of the loose-part detection system shall be demonstrated OPERABLE by performance of a:

- a. CHANNEL CHECK at least once per 24 hours,
- b. CHANNEL FUNCTIONAL TEST at least once per 31 days, and
- c. CHANNEL CALIBRATION at least once per 18 months.

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.7.10 The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3.7.10-1 shall be OPERABLE with their Alarm/Trip Setpoints set to ensure that the limits of Specification 3.11.1.1 are not exceeded. The Alarm/Trip Setpoints of these channels shall be determined and adjusted in accordance with the methodology and parameters in the OFFSITE DOSE CALCULATION MANUAL (ODCM).

APPLICABILITY: At all times.

ACTION:

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- a. With a radioactive liquid effluent monitoring instrumentation channel Alarm/Trip Setpoint less conservative than required by the above specification, immediately suspend the release of radioactive liquid effluents monitored by the affected channel, or declare the channel inoperable, or change the setpoint so it is acceptably conservative.
- b. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3.7.10-1. Exert best efforts to return the instruments to OPERABLE status within 30 days and, if unsuccessful, explain in the next Semiannual Radioactive Effluent Release Report pursuant to Specification 6.9.1.7 why this inoperability was not corrected in a timely manner.
- c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.7.10 Each radioactive liquid effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION, and CHANNEL FUNCTIONAL TEST at the frequencies shown in Table 4.3.7.10-1.

TABLE 3.3.7.10-1

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

	INSTRUMENT	MINIMUM CHANNELS OPERABLE	ACTION
1.	RADIOACTIVITY MONITORS PROVIDING ALARM AND AUTOMATIC TERMINATION OF RELEASE		
	a. Liquid Radwaste Discharge Line to the Cooling Tower Blowdown Line	1	110
2.	RADIOACTIVITY MONITORS PROVIDING ALARM BUT NOT PROVIDING AUTOMATIC TERMINATION OF RELEASE		•
	a. Cooling Tower Blowdown Effluent	1	111
3.	FLOW RATE MEASUREMENT DEVICES		
	a. Liquid Radwaste Discharge Line to Cooling Tower Blowdown Line	• 1	112
	b. Cooling Tower Blowdown Weir	1	112

HOPE CREEK

TABLE 4.3.7.10-1 (Continued)

TABLE NOTATIONS

- (1) The CHANNEL FUNCTIONAL TEST shall also demonstrate that automatic isolation of this pathway and control room alarm annunciation occur if any of the following conditions exists:
 - a. Instrument indicates measured levels above the Alarm/Trip Setpoint. or
 - b. Circuit failure, or

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- c. Instrument indicates a downscale failure.
- (2) The CHANNEL FUNCTIONAL TEST shall also demonstrate that control room alarm annunciation occurs if any of the following conditions exists:
 - a. Instrument indicates measured levels above the Alarm Setpoint, or
 - b. Circuit failure, or
 - c. Instrument indicates a downscale failure.
- (3) The initial CHANNEL CALIBRATION shall be performed using one or more of the reference standards certified by the National Bureau of Standards (NBS) or using standards that have been obtained from suppliers that participate in measurement assurance activities with NBS. These standards shall permit calibrating the system over its intended range of energy and measurement range. For subsequent CHANNEL CALIBRATION, sources that have been related to the initial calibration or are NBS traceable shall be used.
- (4) CHANNEL CHECK shall consist of verifying indication of flow during periods of release. CHANNEL CHECK shall be made at least once per 24 hours on days on which continuous, periodic, or batch releases are made.

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RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.7.11 The radioactive gaseous effluent monitoring instrumentation channels shown in Table 3.3.7.11-1 shall be OPERABLE with their Alarm/Trip Setpoints set to ensure that the limits of Specifications 3.11.2.1 and 3.11.2.6 are not exceeded. The Alarm/Trip Setpoints of these channels meeting Specification 3.11.2.1 shall be determined and adjusted in accordance with the methodology and parameters in the ODCM.

APPLICABILITY: As shown in Table 3.3.7.11-1.

ACTION:

- a. With a radioactive gaseous effluent monitoring instrumentation channel Alarm/Trip Setpoint less conservative than required by the above specification, immediately suspend the release of radioactive gaseous effluents monitored by the affected channel, or declare the channel inoperable, or change the setpoint so it is acceptably conservative.
- b. With less than the minimum number of radioactive gaseous effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3.7.11-1. Exert best efforts to return the instruments to OPERABLE status within 30 days and, if unsuccessful, explain in the next Semiannual Radioactive Effluent Release Report pursuant to Specification 6.9.1.7 why this inoperability was not corrected in a timely manner.
- c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.7.11 Each radioactive gaseous effluent monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, SOURCE CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST at the frequencies shown in Table 4.3.7.11-1.

3/4.3.8 TURBINE OVERSPEED PROTECTION SYSTEM

LIMITING CONDITION FOR OPERATION

3.3.8 At least one turbine overspeed protection system shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1 and 2.

ACTION:

- a. With one turbine control valve, or one main stop valve per high pressure turbine steam lead inoperable and/or with one combined intermediate valve per low pressure turbine steam lead inoperable, restore the inoperable valve(s) to OPERABLE status within 72 hours or close at least one valve in the affected steam lead(s) or isolate the turbine from the steam supply within the next 6 mours.
- b. With the above required turbine overspeed protection system otherwise inoperable, within 6 hours isolate the turbine from the steam supply.

SURVEILLANCE REQUIREMENTS

4.3.8.1 The provisions of Specification 4.0.4 are not applicable.

4.3.8.2 The above required turbine overspeed protection system shall be demonstrated OPERABLE:

- a. At least once per 7 days by:
 - 1. Cycling each of the following valves through at least one complete cycle from the running position:
 - a) For the overspeed protection control system;
 - 1) Six low pressure combined intermediate valves
 - For the electrical overspeed trip system and the mechanical overspeed trip system;
 - 1) Four high pressure main stop valves, and
 - 2) Six low pressure combined intermediate valves.

SURVEILLANCE REQUIREMENTS (Continued)

- b. At least once per 31 days by:
 - 1. Cycling each of the following valves through at least one complete cycle from the running position:
 - a) For the overspeed protection control system;
 - 1) Four high pressure turbine control valves
 - b) For the electrical overspeed trip system and the mechanical overspeed trip system;
 - 1) Four high pressure turbine control valves.
- c. At least once per 18 months by performance of a CHANNEL CALIBRATION of the turbine overspeed protection instrumentation.
- d. At least once per 40 months by disassembling at least one of each of the above valves and performing a visual and surface inspection of all valve seats, disks and stems and verifying no unacceptable flaws or excessive corrosion. If unacceptable flaws or excessive corrosion are found, all other valves of that type shall be inspected.

REACTOR COOLANT SYSTEM

3/4.4.8 STRUCTURAL INTEGRITY

LIMITING CONDITION FOR OPERATION

3.4.8 The structural integrity of ASME Code Class 1, 2 and 3 components shall be maintained in accordance with Specification 4.4.8.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, 4 and 5.

ACTION:

- a. With the structural integrity of any ASME Code Class 1 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) prior to increasing the Reactor Coolant System temperature more than 50°F above the minimum temperature required by NDT considerations.
- b. With the structural integrity of any ASME Code Class 2 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) prior to increasing the Reactor Coolant System temperature above 200°F.
- c. With the structural integrity of any ASME Code Class 3 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) from service.

SURVEILLANCE REQUIREMENTS

4.4.8 No requirements other than Specification 4.0.5.

REACTOR COOLANT SYSTEM

3/4.4.9 RESIDUAL HEAT REMOVAL

HOT SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.4.9.1 Two[#] shutdown cooling mode loops of the residual heat removal (RHR) system shall be OPERABLE and, unless at least one recirculation pump is in

operation, at least one shutdown cooling mode loop shall be in operation*, $\pi\pi$, with each loop consisting of:

- a. One OPERABLE RHR pump, and
- b. One OPERABLE RHR heat exchanger.

<u>APPLICABILITY</u>: OPERATIONAL CONDITION 3, with reactor vessel pressure less than the RHR cut-in permissive setpoint.

ACTION:

- a. With less than the above required RHR shutdown cooling mode loops OPERABLE, immediately initiate corrective action to return the required loops to OPERABLE status as soon as possible. Within one hour and at least once per 24 hours thereafter, demonstrate the operability of at least one alternate method capable of decay heat removal for each inoperable RHR shutdown cooling mode loop. Be in at least COLD SHUTDOWN within 24 hours.**
- b. With no RHR shutdown cooling mode loop or recirculation pump in operation, immediately initiate corrective action to return at least one loop to operation as soon as possible. Within one hour establish reactor coolant circulation by an alternate method and monitor reactor coolant temperature and pressure at least once per hour.
- c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.4.9.1 At least one shutdown cooling mode loop of the residual heat removal system, one recirculation pump, or alternate method shall be determined to be in operation and circulating reactor coolant at least once per 12 hours.

[#]One RHR shutdown cooling mode loop may be inoperable for up to 2 hours for surveilLance testing provided the other loop is OPERABLE and in operation or at least one recirculation pump is in operation.

^{*}The shutdown cooling pump may be removed from operation for up to 2 hours per 8 hour period provided the other loop is OPERABLE.

^{##}The RHR shutdown cooling mode loop may be removed from operation during hydrostatic testing.

^{**}Whenever two or more RHR subsystems are inoperable, if unable to attain COLD SHUTDOWN as required by this ACTION, maintain reactor coolant temperature as low as practical by use of alternate heat removal methods.

REACTOR COOLANT SYSTEM

COLD SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.4.9.2 Two[#] shutdown cooling mode loops of the residual heat removal (RHR) system shall be OPERABLE and, unless at least one recirculation pump is in operation, at least one shutdown cooling mode loop shall be in operation*,^{##} with each loop consisting of:

- a. One OPERABLE RHR pump, and
- b. One OPERABLE RHR heat exchanger.

<u>APPLICABILITY</u>: OPERATIONAL CONDITION 4 and heat losses to ambient** are not sufficient to maintain OPERATIONAL CONDITION 4.

ACTION:

- a. With less than the above required RHR shutdown cooling mode loops OPERABLE, within one hour and at least once per 24 hours thereafter, demonstrate the operability of at least one alternate method capable of decay heat removal for each inoperable RHR shutdown cooling mode loop.
- b. With no RHR shutdown cooling mode loop or recirculation pump in operation, within one hour establish reactor coolant circulation by an alternate method and monitor reactor coolant temperature and pressure at least once per hour.

SURVEILLANCE REQUIREMENTS

4.4.9.2 At least one shutdown cooling mode loop of the residual heat removal system, recirculation pump or alternate method shall be determined to be in operation and circulating reactor coolant at least once per 12 hours.

[#]One RHR shutdown cooling mode loop may be inoperable for up to 2 hours for surveillance testing provided the other loop is OPERABLE and in operation or at least one recirculation pump is in operation.

- *The shutdown cooling pump may be removed from operation for up to 2 hours per 8 hour period provided the other loop is OPERABLE.
- ##The shutdown cooling mode loop may be removed from operation during hydrostatic testing.
- **Ambient losses must be such that no increase in reactor vessel water temperature will occur (even though COLD SHUTDOWN conditions are being maintained).

PLANT SYSTEMS

3/4.7.6 SEALED SOURCE CONTAMINATION

LIMITING CONDITION FOR OPERATION

3.7.6 Each sealed source containing radioactive material either in excess of 100 microcuries of beta and/or gamma emitting material or 5 microcuries of alpha emitting material shall be free of greater than or equal to 0.005 microcuries of removable contamination.

APPLICABILITY: At all times.

ACTION:

- a. With a sealed source having removable contamination in excess of the above limit, withdraw the sealed source from use and either:
 - 1. Decontaminate and repair the sealed source, or
 - 2. Dispose of the sealed source in accordance with Commission Regulations.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.6.1 <u>Test Requirements</u> - Each sealed source shall be tested for leakage and/or contamination by:

- a. The licensee, or
- b. Other persons specifically authorized by the Commission or an Agreement State.

The test method shall have a detection sensitivity of at least 0.005 microcuries per test sample.

4.7.6.2 <u>Test Frequencies</u> - Each category of sealed sources, excluding startup sources and fission detectors previously subjected to core flux, shall be tested at the frequency described below.

- a. <u>Sources in use</u> At least once per six months for all sealed sources containing radioactive material:
 - 1. With a half-life greater than 30 days, excluding Hydrogen 3, and
 - 2. In any form other than gas.

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PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. <u>Stored sources not in use</u> Each sealed source and fission detector shall be tested prior to use or transfer to another licensee unless tested within the previous six months. Sealed sources and fission detectors transferred without a certificate indicating the last test date shall be tested prior to being placed into use.
- c. <u>Startup sources and fission detectors</u> Each sealed startup source and fission detector shall be tested within 31 days prior to being subjected to core flux or installed in the core and following repair or maintenance to the source.

4.7.6.3 <u>Reports</u> - A report shall be prepared and submitted to the Commission on an annual basis if sealed source or fission detector leakage tests reveal the presence of greater than or equal to 0.005 microcuries of removable contamination.

REFUELING OPERATIONS

3/4.9.11 RESIDUAL HEAT REMOVAL AND COOLANT CIRCULATION

HIGH WATER LEVEL

3

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LIMITING CONDITION FOR OPERATION

3.9.11.1 At least one shutdown cooling mode loop of the residual heat removal (RHR) system shall be OPERABLE and in operation* with:

- a. One OPERABLE RHR pump, and
- b. One OPERABLE RHR heat exchanger.

<u>APPLICABILITY</u>: OPERATIONAL CONDITION 5, when irradiated fuel is in the reactor vessel and the water level is greater than or equal to 22 feet 2 inches above the top of the reactor pressure vessel flange and heat losses to ambient^{**} are not sufficient to maintain OPERATIONAL CONDITION 5.

ACTION:

- a. With no RHR shutdown cooling mode loop OPERABLE, within one hour and at least once per 24 hours thereafter, demonstrate the operability of at least one alternate method capable of decay heat removal. Otherwise, suspend all operations involving an increase in the reactor decay heat load and establish SECONDARY CONTAINMENT INTEGRITY within 4 hours.
- b. With no RHR shutdown cooling mode loop in operation, within one hour establish reactor coolant circulation by an alternate method and monitor reactor coolant temperature at least once per hour.

SURVEILLANCE REQUIREMENTS

4.9.11.1 At least one shutdown cooling mode loop of the residual heat removal system or alternate method shall be verified to be in operation and circulating reactor coolant at least once per 12 hours.

The shutdown cooling pump may be removed from operation for up to 2 hours per 8-hour period.

^{**}Ambient losses must be such that no increase in reactor vessel water temperature will occur (even though REFUELING conditions are being maintained).

REFUELING OPERATIONS

LOW WATER LEVEL

LIMITING CONDITION FOR OPERATION

3.9.11.2 Two shutdown cooling mode loops of the residual heat removal (RHR) system shall be OPERABLE and at least one loop shall be in operation,* with each loop consisting of:

- a. One OPERABLE RHR pump, and
- b. One OPERABLE RHR heat exchanger.

<u>APPLICABILITY</u>: OPERATIONAL CONDITION 5, when irradiated fuel is in the reactor vessel and the water level is less than 22 feet 2 inches above the top of the reactor pressure vessel flange and heat losses to ambient** are not sufficient to maintain OPERATIONAL CONDITION 5.

ACTION:

- a. With less than the above required shutdown cooling mode loops of the RHR system OPERABLE, within one hour and at least once per 24 hours there-after, demonstrate the OPERABILITY of at least one alternate method capable of decay heat removal for each inoperable RHR shutdown cooling mode loop.
- b. With no RHR shutdown cooling mode loop in operation, within one hour establish reactor coolant circulation by an alternate method and monitor reactor coolant temperature at least once per hour.

SURVEILLANCE REQUIREMENTS

4.9.11.2 At least one shutdown cooling mode loop of the residual heat removal system or alternate method shall be verified to be in operation and circulating reactor coolant at least once per 12 hours.

^{*}The shutdown cooling pump may be removed from operation for up to 2 hours per 8-hour period.

^{**}Ambient losses must be such that no increase in reactor vessel water temperature will occur (even though REFUELING conditions are being maintained).

DOSE

LIMITING CONDITION FOR OPERATION

3.11.1.2 The dose or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released, from each reactor unit, to UNRESTRICTED AREAS (see Figure 5.1.1-1) shall be limited:

- a. During any calendar quarter to less than or equal to 1.5 mrems to the total body and to less than or equal to 5 mrems to any organ, and
- b. During any calendar year to less than or equal to 3 mrems to the total body and to less than or equal to 10 mrems to any organ.

APPLICABILITY: At all times.

ACTION:

- a. With the calculated dose from the release of radioactive materials in liquid effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.2 Cumulative dose contributions from liquid effluents for the current calendar quarter and the current calendar year shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.

LIQUID WASTE TREATMENT

LIMITING CONDITION FOR OPERATION

3.11.1.3 The liquid radwaste treatment system shall be OPERABLE and appropriate portions of the system shall be used to reduce the radioactive materials in liquid wastes prior to their discharge when the projected doses due to the liquid effluent, from each reactor unit, to UNRESTRICTED AREAS (see Figure 5.1.1-1) would exceed 0.06 mrem to the total body or 0.2 mrem to any organ in any 31-day period.

APPLICABILITY: At all times.

ACTION:

- a. With radioactive liquid waste being discharged and in excess of the above limits and any portion of the liquid radwaste treatment system not in operation, prepare and submit to the Commission within 30 days pursuant to Specification 6.9.2 a Special Report that includes the following information:
 - 1. Explanation of why liquid radwaste was being discharged without treatment, identification of any inoperable equipment or subsystems, and the reason for the inoperability,
 - Action(s) taken to restore the inoperable equipment to OPERABLE status, and
 - 3. Summary description of action(s) taken to prevent a recurrence.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.3.1 Doses due to liquid releases from each reactor unit to UNRESTRICTED AREAS shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM.

4.11.1.3.2 The installed liquid radwaste treatment system shall be demonstrated OPERABLE by meeting Specifications 3.11.1.1 and 3.11.1.2.

LIQUID HOLDUP TANKS

LIMITING CONDITION FOR OPERATION

3.11.1.4 The quantity of radioactive material contained in any outside temporary tank shall be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases.

APPLICABILITY: At all times.

ACTION:

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- a. With the quantity of radioactive material in any of the above tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tank, within 48 hours reduce the tank contents to within the limit, and describe the events leading to this condition in the next Semiannual Radioactive Effluent Release Report, pursuant to Specification 6.9.1.7.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.4 The quantity of radioactive material contained in each of the above tanks shall be determined to be within the above limit by analyzing a representative sample of the tank's contents at least once per 7 days when radio-active materials are being added to the tank.

3/4.11.2 GASEOUS EFFLUENTS

DOSE RATE

LIMITING CONDITION FOR OPERATION

3.11.2.1 The dose rate due to radioactive materials released in gaseous effluents from the site to areas at and beyond the SITE BOUNDARY (see Figure 5.1.1-1) shall be limited to the following:

- a. For noble gases: Less than or equal to 500 mrems/yr to the total body and less than or equal to 3000 mrems/yr to the skin, and
- b. For iodine-131, iodine-133, tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to 1500 mrems/yr to any organ.

APPLICABILITY: At all times.

ACTION:

With the dose rate(s) exceeding the above limits, immediately restore the release rate to within the above limit(s).

SURVEILLANCE REQUIREMENTS

4.11.2.1.1 The dose rate due to noble gases in gaseous effluents shall be determined to be within the above limits in accordance with the methodology and parameters in the ODCM.

4.11.2.1.2 The dose rate due to iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents shall be determined to be within the above limits in accordance with the methodology and parameters in the ODCM by obtaining representative samples and performing analyses in accordance with the sampling and analysis program specified in Table 4.11.2.1.2-1.

TABLE 4.11.2.1.2-1 (Continued)

TABLE NOTATIONS

- (b)The principal gamma emitters for which the LLD specification applies exclusively are the following radionuclides: Kr-87, Kr-88, Xe-133, Xe-133m, Xe-135, and Xe-138 in noble gas releases and Mn-54, Fe-59, Co-58, Co-60, Zn-65, Mo-99, I-131, Cs-134, Cs-137, Ce-141 and Ce-144 in iodine and particulate releases. This list does not mean that only these nuclides are to be considered. Other gamma peaks that are identifiable, together with those of the above nuclides, shall also be analyzed and reported in the Semiannual Radioactive Effluent Release Report pursuant to Specification 6.9.1.7.
- (c)Sampling and analysis shall also be performed following shutdown, startup, or a THERMAL POWER change exceeding 15% of RATED THERMAL POWER within a 1-hour period. This requirement does not apply if (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has not increased more than a factor of 3; and (2) the noble gas monitor shows that effluent activity has not increased more than a factor of 3.
- (d)Tritium grab samples shall be taken at least once per 7 days from the ventilation exhaust from the spent fuel pool area, whenever spent fuel is in the spent fuel pool.
- (e)The ratio of the sample flow rate to the sampled stream flow rate shall be known for the time period covered by each dose or dose rate calculation made in accordance with Specifications 3.11.2.1, 3.11.2.2, and 3.11.2.3.
- (f)Samples shall be changed at least once per 7 days and analyses shall be completed within 48 hours after changing, or after removal from sampler. Sampling shall also be performed at least once per 24 hours for at least 7 days following each shutdown, startup or THERMAL POWER change exceeding 15% of RATED THERMAL POWER in 1 hour and analyses shall be completed within 48 hours of changing. When samples collected for 24 hours are analyzed, the corresponding LLDs may be increased by a factor of 10. This requirement does not apply if (1) analysis shows that the DOSE EQUIVALENT I-131 concentration in the primary coolant has not increased more than a factor of 3; and (2) the noble gas monitor shows that effluent activity has not increased more than a factor of 3.

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DOSE - NOBLE GASES

LIMITING CONDITION FOR OPERATION

3.11.2.2 The air dose due to noble gases released in gaseous effluents, from each reactor unit, to areas at and beyond the SITE BOUNDARY (see Figure 5.1.1-1) shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 5 mrads for gamma radiation and less than or equal to 10 mrads for beta radiation and.
- b. During any calendar year: Less than or equal to 10 mrads for gamma radiation and less than or equal to 20 mrads for beta radiation.

APPLICABILITY: At all times.

ACTION

- a. With the calculated air dose from radioactive noble gases in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.2 Cumulative dose contributions for the current calendar quarter and current calendar year for noble gases shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.

DOSE - IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM

LIMITING CONDITION FOR OPERATION

3.11.2.3 The dose to a MEMBER OF THE PUBLIC from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released, from each reactor unit, to areas at and beyond the SITE BOUNDARY (see Figure 5.1.1-1) shall be limited to the following:

- a. During any calendar quarter: Less than or equal to 7.5 mrems to any organ and,
- b. During any calendar year: Less than or equal to 15 mrems to any organ.

APPLICABILITY: At all times.

ACTION:

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- a. With the calculated dose from the release of iodine-131, iodine-133, tritium, and radionuclides in particulate form with half lives greater than 8 days, in gaseous effluents exceeding any of the above limits, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit and defines the corrective actions that have been taken to reduce the releases and the proposed corrective actions to be taken to assure that subsequent releases will be in compliance with the above limits.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.3 Cumulative dose contributions for the current calendar quarter and current calendar year for iodine-131, iodine-133, tritium, and radionuclides in particulate form with half-lives greater than 8 days shall be determined in accordance with the methodology and parameters in the ODCM at least once per 31 days.

GASEOUS RADWASTE TREATMENT

LIMITING CONDITION FOR OPERATION

3.11.2.4 The GASEOUS RADWASTE TREATMENT SYSTEM shall be in operation.

<u>APPLICABILITY</u>: Whenever the main condenser steam jet air ejector system is in operation.

ACTION:

- a. With gaseous radwaste from the main condenser air ejector system being discharged without treatment for more than 7 days, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that includes the following information:
 - 1. Identification of the inoperable equipment or subsystems and the reason for the inoperability,
 - 2. Action(s) taken to restore the inoperable equipment to OPERABLE status, and
 - 3. Summary description of action(s) taken to prevent a recurrence.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.4 The readings of the relevant instruments shall be checked every 12 hours when the main condenser air ejector is in use to ensure that the gaseous radwaste treatment system is functioning.

VENTILATION EXHAUST TREATMENT SYSTEM

LIMITING CONDITION FOR OPERATION

3.11.2.5 The VENTILATION EXHAUST TREATMENT SYSTEM for the Reactor Building and the Service and Radwaste Building shall be OPERABLE and appropriate portions of this system shall be used to reduce release of radioactivity when the projected doses in 31 days due to gaseous effluent releases from each unit to areas at and beyond the SITE BOUNDARY (see Figure 5.1.1-1) would exceed:

a. 0.2 mrad to air from gamma radiation, or

b. 0.4 mrad to air from beta radiation, or

c. 0.3 mrem to any organ of a MEMBER OF THE PUBLIC

APPLICABILITY: At all times.

ACTION:

- a. With radioactive ventilation exhaust being discharged without treatment and in excess of the above limits, prepare and submit to the Commission within 30 days pursuant to Specification 6.9.2 a Special Report that includes the following information:
 - 1. Identification of any inoperable equipment or subsystems, and the reason for the inoperability,
 - 2. Action(s) taken to restore the inoperable equipment to OPERABLE status, and
 - 3. Summary description of action(s) taken to prevent a recurrence.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.5.1 Doses due to gaseous releases from each unit to areas at and beyond the SITE BOUNDARY shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM, when the VENTILATION EXHAUST TREATMENT SYSTEM is not being fully utilized.

4.11.2.5.2 The installed VENTILATION EXHAUST TREATMENT SYSTEM shall be considered OPERABLE by meeting Specifications 3.11.2.1 and 3.11.2.2 and 3.11.2.3.

EXPLOSIVE GAS MIXTURE

LIMITING CONDITION FOR OPERATION

3.11.2.6 The concentration of hydrogen in the main condenser offgas treatment system shall be limited to less than or equal to 4% by volume.

APPLICABILITY: At all times.

ACTION:

- a. With the concentration of hydrogen in the main condenser offgas treatment system exceeding the limit, restore the concentration to within the limit within 48 hours.
- b. With continuous monitors inoperable, operation of the main condenser offgas treatment system may continue for up to 30 days provided grab samples are collected at least once per 4 hours and analyzed within the following 4 hours.
- c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.6 The concentration of hydrogen in the main condenser offgas treatment system shall be determined to be within the above limits by continuously monitoring the waste gases in the main condenser offgas treatment system whenever the main condenser evacuation system is in operation with the hydrogen monitors required OPERABLE by Table 3.3.7.11-1 of Specification 3.3.7.11.

MAIN CONDENSER

LIMITING CONDITION FOR OPERATION

3.11.2.7 The radioactivity rate of noble gases measured at the recombiner after-condenser discharge shall be limited to less than or equal to 330 millicuries/sec after 30 minute decay.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2* and 3*.

ACTION:

With the radioactivity rate of noble gases at the recombiner after-condenser discharge exceeding 330 millicuries/sec after 30 minute decay, restore the radioactivity rate to within its limit within 72 hours or be in at least HOT STANDBY within the next 12 hours.

SURVEILLANCE REQUIREMENTS

4.11.2.7.1 The radioactivity rate of noble gases at the recombiner aftercondenser discharge shall be continuously monitored in accordance with Specification 3.3.7.1.

4.11.2.7.2 The radioactivity rate of noble gases from the recombiner aftercondenser discharge shall be determined to be within the limits of Specification 3.11.2.7 at the following frequencies by performing an isotopic analysis of a representative sample of gases taken near the discharge of the main condenser air ejector:

- a. At least once per 31 days.
- b. Within 4 hours following an increase, as indicated by the Offgas Radioactivity Monitor, of greater than 50%, after factoring out increases due to changes in THERMAL POWER level, in the nominal steady-state fission gas release from the primary coolant.
- c. The provisions of Specification 4.0.4 are not applicable.

^{*}When the main condenser air ejector is in operation.

VENTING OR PURGING

LIMITING CONDITION FOR OPERATION

3.11.2.8 VENTING or PURGING of the Mark I containment drywell shall be through either the reactor building ventilation system or the filtration, recirculation and ventilation system.

<u>APPLICABILITY</u>: Whenever the containment is vented or purged.

ACTION:

- a. With the requirements of the above specification not satisfied, suspend all VENTING and PURGING of the drywell.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.8 The containment shall be determined to be aligned for VENTING or PURGING through either the reactor building ventilation system or the filtration, recirculation and ventilation system within 4 hours prior to start of and at least once per 12 hours during VENTING or PURGING of the drywell.

3/4.11.3 SOLID RADIOACTIVE WASTE TREATMENT

LIMITING CONDITION FOR OPERATION

3.11.3 Radioactive wastes shall be SOLIDIFIED or dewatered in accordance with the PROCESS CONTROL PROGRAM to meet shipping and transportation requirements during transit, and disposal site requirements when received at the disposal site.

APPLICABILITY: At all times.

ACTION:

- a. With SOLIDIFICATION or dewatering not meeting disposal site and shipping and transportation requirements, suspend shipment of the inadequately processed wastes and correct the PROCESS CONTROL PROGRAM, the procedures and/or the solid waste system as necessary to prevent recurrence.
- b. With SOLIDIFICATION or dewatering not performed in accordance with the PROCESS CONTROL PROGRAM, (1) demonstrate by test or analysis that the improperly processed waste in each container meets the requirements for transportation to the disposal site and for receipt at the disposal site and (2) take appropriate administrative action to prevent recurrence.
- c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.3.1 The PROCESS CONTROL PROGRAM shall be followed to verify that the properties of the packaged waste meet the minimum stability requirements of 10 CFR Part 61 and other requirements for transportation to the disposal site and receipt at the disposal site.

4.11.3.2 The PROCESS CONTROL PROGRAM shall include sufficient quality control and assurance methods to assure the solidified waste product from any process (either in-house or contracted vendor) meets the requirements for transportation and receipt at the disposal site.

3/4.11.4 TOTAL DOSE

LIMITING CONDITION FOR OPERATION

3.11.4 The annual (calendar year) dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources shall be limited to less than or equal to 25 mrems to the total body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrems.

APPLICABILITY: At all times.

ACTION:

With the calculated doses from the release of radioactive materials а. in liquid or gaseous effluents exceeding twice the limits of Specification 3.11.1.2a., 3.11.1.2b., 3.11.2.2a., 3.11.2.2b., 3.11.2.3a., or 3.11.2.3b., calculations should be made including direct radiation contributions from the units including outside storage tanks, etc. to determine whether the above limits of Specification 3.11.4 have been exceeded. If such is the case, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the above limits and includes the schedule for achieving conformance with the above This Special Report, as defined in 10 CFR 20.405c, shall limits. include an analysis that estimates the radiation exposure (dose) to a MEMBER OF THE PUBLIC from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentrations of radioactive material involved, and the cause of the exposure levels or concentrations. If the estimated dose(s) exceeds the above limits, and if the release condition resulting in violation of 40 CFR Part 190 has not already been corrected, the Special Report shall include a request for a variance in accordance with the provisions of 40 CFR Part 190. Submittal of the report is considered a timely request, and a variance is granted until staff action on the request is complete.

b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.4.1 Cumulative dose contributions from liquid and gaseous effluents shall be determined in accordance with Specifications 4.11.1.2, 4.11.2.2, and 4.11.2.3, and in accordance with the methodology and parameters in the ODCM.

4.11.4.2 Cumulative dose contributions from direct radiation from the units including outside storage tanks, etc. shall be determined in accordance with the methodology and parameters in the ODCM. This requirement is applicable only under conditions set forth in Specification 3.11.4, ACTION a.

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3/4.12 RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.1 MONITORING PROGRAM

LIMITING CONDITION FOR OPERATION

3.12.1 The radiological environmental monitoring program shall be conducted as specified in Table 3.12.1-1.

APPLICABILITY: At all times.

ACTION:

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- a. With the radiological environmental monitoring program not being conducted as specified in Table 3.12.1-1, prepare and submit to the Commission, in the Annual Radiological Environmental Operating Report required by Specification 6.9.1.7, a description of the reasons for not conducting the program as required and the plans for preventing a recurrence.
- b. With the level of radioactivity as the result of plant effluents in an environmental sampling medium at a specified location exceeding the reporting levels of Table 3.12.1-2 when averaged over any calendar quarter, prepare and submit to the Commission within 30 days, pursuant to Specification 6.9.2, a Special Report that identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to reduce radioactive effluents so that the potential annual dose* to A MEMBER OF THE PUBLIC is less than the calendar year limits of Specifications 3.11.1.2, 3.11.2.2, and 3.11.2.3. When more than one of the radionuclides in Table 3.12.1-2 are detected in the sampling medium, this report shall be submitted if:

 $\frac{\text{concentration (1)}}{\text{reporting level (1)}} + \frac{\text{concentration (2)}}{\text{reporting level (2)}} + \dots > 1.0$

When radionuclides other than those in Table 3.12-2 are detected and are the result of plant effluents, this report shall be submitted if the potential annual dose* to A MEMBER OF THE PUBLIC from all radionuclides is equal to or greater than the calendar year limits of Specifications 3.11.1.2, 3.11.2.2, and 3.11.2.3. This report is not required if the measured level of radioactivity was not the result of plant effluents; however, in such an event, the condition shall be reported and described in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.6.

c. With milk or fresh leafy vegetable samples unavailable from one or more of the sample locations required by Table 3.12.1-1, identify specific locations for obtaining replacement samples and add them to the radiological environmental monitoring program within 30 days.

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^{*}The methodology used to estimate the potential annual dose to a MEMBER OF THE PUBLIC shall be indicated in this report.

RADIOLOGICAL ENVIRONMENTAL MONITORING

LIMITING CONDITION FOR OPERATION (Continued)

ACTION: (Continued)

The specific locations from which samples were unavailable may then be deleted from the monitoring program. Pursuant to Specification 6.9.1.8, identify the cause of the unavailability of samples and identify the new location(s) for obtaining replacement samples in the next Semiannual Radioactive Effluent Release Report pursuant to Specification 6.9.1.8 and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).

d. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.1 The radiological environmental monitoring samples shall be collected pursuant to Table 3.12.1-1 from the specific locations given in the table and figure(s) in the ODCM, and shall be analyzed pursuant to the requirements of Table 3.12.1-1 and the detection capabilities required by Table 4.12.1-1.

RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.2 LAND USE CENSUS

LIMITING CONDITION FOR OPERATION

3.12.2 A land use census shall be conducted and shall identify within a distance of 8 km (5 miles) the location in each of the 16 meteorological sectors of the nearest milk animal, the nearest residence and the nearest garden* of greater than 50 m² (500 ft²) producing broad leaf vegetation.

APPLICABILITY: At all times.

ACTION:

- a. With a land use census identifying a location(s) that yields a calculated dose or dose commitment greater than the values currently being calculated in Specification 4.11.2.3, identify the new location(s) in the next Semiannual Radioactive Effluent Release Report, pursuant to Specification 6.9.1.7.
- b. With a land use census identifying a location(s) that yields a calculated dose or dose commitment (via the same exposure pathway) 20% greater than at a location from which samples are currently being obtained in accordance with Specification 3.12.1, add the new location(s) to the radiological environmental monitoring program within 30 days. The sampling location(s), excluding the control station location, having the lowest calculated dose or dose commitment(s), via the same exposure pathway, may be deleted from this monitoring program after October 31 of the year in which this land use census was conducted. Pursuant to Specification 6.9.1.8, identify the new location(s) in the next Semiannual Radioactive Effluent Release Report and also include in the report a revised figure(s) and table for the ODCM reflecting the new location(s).
- c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.2 The land use census shall be conducted during the growing season at least once per 12 months using that information that will provide the best results, such as by a door-to-door survey, visual survey, aerial survey, or by consulting local agriculture authorities. The results of the land use census shall be included in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.6.

^{*}Broad leaf vegetation sampling of at least three different kinds of vegetation may be performed at the SITE BOUNDARY in each of two different direction sectors with the highest predicted D/Qs in lieu of the garden census. Specifications for broad leaf vegetation sampling in Table 3.12.1-1, Part 4.c., shall be followed, including analysis of control samples.

RADIOLOGICAL ENVIRONMENTAL MONITORING

3/4.12.3 INTERLABORATORY COMPARISON PROGRAM

LIMITING CONDITION FOR OPERATION

3.12.3 Analyses shall be performed on radioactive materials supplied as part of an Interlaboratory Comparison Program that has been approved by the Commission.

APPLICABILITY: At all times.

ACTION:

- a. With analyses not being performed as required above, report the corrective actions taken to prevent a recurrence to the Commission in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.6.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.12.3 The Interlaboratory Comparison Program shall be described in the ODCM. A summary of the results obtained as part of the above required Interlaboratory Comparison Program shall be included in the Annual Radiological Environmental Operating Report pursuant to Specification 6.9.1.6.

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> <u>Specifications 3.0.1 through 3.0.4</u> establish the general requirements applicable to Limiting Conditions for Operation. These requirements are based on the requirements for Limiting Conditions for Operation stated in the Code of Federal Regulations, 10 CFR 50.36(c)(2):

"Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specification until the condition can be met."

<u>Specification 3.0.1</u> establishes the Applicability statement within each individual specification as the requirement for when (i.e., in which OPERATIONAL CONDITIONS or other specified conditions) conformance to the Limiting Conditions for Operation is required for safe operation of the facility. The ACTION requirements establish those remedial measures that must be taken within specified time limits when the requirements of a Limiting Condition for Operation are not met. It is not intended that the shutdown ACTION requirements be used as an operational convenience which permits (routine) voluntary removal of a system(s) or component(s) from service in lieu of other alternatives that would not result in redundant systems or components being inoperable.

There are two basic types of ACTION requirements. The first specifies the remedial measures that permit continued operation of the facility which is not further restricted by the time limits of the ACTION requirements. In this case, conformance to the ACTION requirements provides an acceptable level of safety for unlimited continued operation as long as the ACTION requirements continue to be met. The second type of ACTION requirement specifies a time limit in which conformance to the conditions of the Limiting Condition for Operation must be met. This time limit is the allowable outage time to restore an inoperable system or component to OPERABLE status or for restoring parameters within specified limits. If these actions are not completed within the allowable outage time limits, a shutdown is required to place the facility in an OPERATIONAL CONDITION or other specified condition in which the specification no longer applies.

The specified time limits of the ACTION requirements are applicable from the point in time it is identified that a Limiting Condition for Operation is not met. The time limits of the ACTION requirements are also applicable when a system or component is removed from service for surveillance testing or investigation of operational problems. Individual specifications may include a specified time limit for the completion of a Surveillance Requirement when equipment is removed from service. In this case, the allowable outage time limits of the ACTION requirements are applicable when this limit expires if the surveillance has not been completed. When a shutdown is required to comply with ACTION requirements, the plant may have entered an OPERATIONAL CONDITION in which a new specification becomes applicable. In this case, the

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time limits of the ACTION requirements would apply from the point in time that the new specification becomes applicable if the requirements of the Limiting Condition for Operation are not met.

<u>Specification 3.0.2</u> establishes that noncompliance with a specification exists when the requirements of the Limiting Condition for Operation are not met and the associated ACTION requirements have not been implemented within the specified time interval. The purpose of this specification is to clarify that (1) implementation of the ACTION requirements within the specified time interval constitutes compliance with a specification and (2) completion of the remedial measures of the ACTION requirements is not required when compliance with a Limiting Condition of Operation is restored within the time interval specified in the associated ACTION requirements.

Specification 3.0.3 establishes the shutdown ACTION requirements that must be implemented when a Limiting Condition for Operation is not met and the condition is not specifically addressed by the associated ACTION requirements. purpose of this specification is to delineate the time limits for placing the unit in a safe shutdown CONDITION when plant operation cannot be maintained within the limits for safe operation defined by the Limiting Conditions for Operation and its ACTION requirements. It is not intended to be used as an operational convenience which permits (routine) voluntary removal of redundant systems or components from service in lieu of other alternatives that would not result in redundant systems or components being inoperable. One hour is allowed to prepare for an orderly shutdown before initiating a change in plant operation. This time permits the operator to coordinate the reduction in electrical generation with the load dispatcher to ensure the stability and availability of the electrical grid. The time limits specified to reach lower CONDITIONS of operation permit the shutdown to proceed in a controlled and orderly manner that is well within the specified maximum cooldown rate and within the cooldown capabilities of the facility assuming only the minimum required equipment is OPERABLE. This reduces thermal stresses on components of the primary coolant system and the potential for a plant upset that could challenge safety systems under conditions for which this specification applies.

If remedial measures permitting limited continued operation of the facility under the provisions of the ACTION requirements are completed, the shutdown may be terminated. The time limits of the ACTION requirements are applicable from the point in time there was a failure to meet a Limiting Condition for Operation. Therefore, the shutdown may be terminated if the ACTION requirements have been met or the time limits of the ACTION requirements have not expired, thus providing an allowance for the completion of the required actions.

The time limits of Specification 3.0.3 allow 37 hours for the plant to be in COLD SHUTDOWN when a shutdown is required during POWER operation. If the plant is in a lower CONDITION of operation when a shutdown is required, the time limit for reaching the next lower CONDITION of operation applies. However, if

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a lower CONDITION of operation is reached in less time than allowed, the total allowable time to reach COLD SHUTDOWN, or other OPERATIONAL CONDITION, is not reduced. For example, if STARTUP is reached in 2 hours, the time allowed to reach HOT SHUTDOWN is the next 11 hours because the total time to reach HOT SHUTDOWN is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to POWER operation, a penalty is not incurred by having to reach a lower CONDITION of operation in less than the total time allowed.

The same principle applies with regard to the allowable outage time limits of the ACTION requirements, if compliance with the ACTION requirements for one specification results in entry into an OPERATIONAL CONDITION or condition of operation for another specification in which the requirements of the Limiting Condition for Operation are not met. If the new specification becomes applicable in less time than specified, the difference may be added to the allowable outage time limits of the second specification. However, the allowable outage time limits of ACTION requirements for a higher CONDITION of operation may not be used to extend the allowable outage time that is applicable when a Limiting Condition for Operation is not met in a lower CONDITION of operation.

The shutdown requirements of Specification 3.0.3 do not apply in CONDITIONS 4 and 5, because the ACTION requirements of individual specifications define the remedial measures to be taken.

<u>Specification 3.0.4</u> establishes limitations on a change in OPERATIONAL CONDI-TIONS when a Limiting Condition for Operation is not met. It precludes placing the facility in a higher CONDITION of operation when the requirements for a Limiting Condition for Operation are not met and continued noncompliance to these conditions would result in a shutdown to comply with the ACTION requirements if a change in CONDITIONS were permitted. The purpose of this specification is to ensure that facility operation is not initiated or that higher CONDITIONS of operation are not entered when corrective action is being taken to obtain compliance with a specification by restoring equipment to OPERABLE status or parameters to specified limits. Compliance with ACTION requirements that permit continued operation of the facility for an unlimited period of time provides an acceptable level of safety for continued operation without regard to the status of the plant before or after a change in OPERATIONAL CONDITIONS. Therefore, in this case, entry into an OPERATIONAL CONDITION or other specified condition may be made in accordance with the provisions of the ACTION requirements. The provisions of this specification should not, however, be interpreted as endorsing the failure to exercise good practice in restoring systems or components to OPERABLE status before plant startup.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 3.0.4 do not apply because they would delay placing the facility in a lower CONDITION of operation.

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<u>Specifications 4.0.1 through 4.0.5</u> establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations, 10 CFR 50.36(c)(3):

"Surveillance requirements are requirements relating to test, calibration, or inspection to ensure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions of operation will be met."

<u>Specification 4.0.1</u> establishes the requirement that surveillances must be performed during the OPERATIONAL CONDITIONS or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirement. The purpose of this specification is to ensure that surveillances are performed to verify the operational status of systems and components and that parameters are within specified limits to ensure safe operation of the facility when the plant is in an OPERATIONAL CONDITION or other specified condition for which the individual Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL CONDITION for which the requirements of the associated Limiting Condition for Operation do not apply unless otherwise specified. The Surveillance Requirements associated with a Special Test Exception are only applicable when the Special Test Exception is used as an allowable exception to the requirements of a specification.

<u>Specification 4.0.2</u> establishes the conditions under which the specified time interval for Surveillance Requirements may be extended. Item a. permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. Item b. limits the use of the provisions of item a. to ensure that it is not used repeatedly to extend the surveillance interval beyond that specified. The limits of Specification 4.0.2 are based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. These provisions are sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

<u>Specification 4.0.3</u> establishes the failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, as a condition that constitutes a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Under the provisions of this specification, systems and components are assumed to be OPERABLE when Surveillance Requirements have been satisfactorily performed within the specified time interval. However, nothing in this provision is to

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be construed as implying that systems or components are OPERABLE when they are found or known to be inoperable although still meeting the Surveillance Requirements. This specification also clarifies that the ACTION requirements are applicable when Surveillance Requirements have not been completed within the allowed surveillance interval and that the time limits of the ACTION requirements apply from the point in time it is identified that a surveillance has not been performed and not at the time that the allowed surveillance interval was exceeded. Completion of the Surveillance Requirement within the allowable outage time limits of the ACTION requirements restores compliance with the requirements of Specification 4.0.3. However, this does not negate the fact that the failure to have performed the surveillance within the allowed surveillance interval, defined by the provisions of Specification 4.0.2, was a violation of the OPERABILITY requirements of a Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specifications.

If the allowable outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3., a 24-hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown would be required to comply with ACTION requirements or before other remedial measures would be required that may preclude the completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of CONDITION changes imposed by ACTION requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24-hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

<u>Specification 4.0.4</u> establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL CONDITION or other

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condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into an OPERATIONAL CONDITION or other specified condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL CONDITIONS or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to assume that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower CONDITIONS of operation.

<u>Specification 4.0.5</u> establishes the requirement that inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. These requirements apply except when relief has been provided in writing by the Commission.

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. The requirements of Specification 4.0.4 to perform surveillance activities before entry into an OPERATIONAL CONDITION or other specified condition takes precedence over the ASME Boiler and Pressure Vessel Code provision that allows pumps and valves to be tested up to one week after return to normal operation. The Technical Specification definition of OPERABLE does not allow a grace period before a component, which is not capable of performing its specified function, is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision that allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 19 TO FACILITY OPERATING LICENSE NO. NPF-57

PUBLIC SERVICE ELECTRIC & GAS COMPANY

ATLANTIC CITY ELECTRIC COMPANY

HOPE CREEK GENERATING STATION

DOCKET NO. 50-354

1.0 INTRODUCTION

By letter dated April 28, 1988, Public Service Electric & Gas Company (licensee) requested an amendment to Facility Operating License No. NPF-57 for the Hope Creek Generating Station. The proposed amendments would change the Hope Creek Generating Station (HCGS) Technical Specifications based on the recommendations provided by the staff in Generic Letter 87-09 related to applicability of limiting conditions for operation (LCO) and surveillance requirements of Technical Specification Sections 3.0 and 4.0.

Specifically, the licensee has requested the following revisions to Technical Specifications.

- Specification 3.0.4 revised to define when its provisions apply (i.e. when the affected action statements permit continued operation for an unlimited period of time) instead of defining when the provisions of Specification 3.0.4 do not apply. Action statements stating that the provisions of Section 3.0.4 do not apply are deleted throughout the Technical Specifications.
- Specification 4.0.3 revised to incorporate a 24-hour delay in implementing action requirements due to a missed surveillance when the action requirements provide a restoration time that is less than 24 hours.
- Specification 4.0.4 revised to clarify that "This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements."

2.0 EVALUATION

The proposed changes to the HCGS Technical Specifications 3.0.4, 4.0.3, and 4.0.4 are consistent with the related staff positions outlined in the Generic Letter 87-09 dated June 4, 1987. The changes proposed by the licensee are compared with staff positions in the following paragraphs.

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Technical Specification 3.0.4

In the Generic Letter 87-09 the staff took the following position related to Specification 3.0.4 changes which will prevent inconsistent application of Specification 3.0.4:

"Specification 3.0.4 unduly restricts facility operation when conformance to the Action Requirements provides an acceptable level of safety for continued operation. For an LCO that has Action Requirements permitting continued operation for an unlimited period of time, entry into an operational mode or other specified condition of operation should be permitted in accordance with those Action Requirements. This is consistent with NRC's regulatory requirements for an LCO. The restriction on a change in operational modes or other specified conditions should apply only where the Action Requirements establish a specified time interval in which the LCO must be met or a shutdown of the facility would be required. However, nothing in this staff position should be interpreted as endorsing or encouraging a plant startup with inoperable equipment. The staff believes that good practice should dictate that the plant startup should normally be initiated only when all required equipment is operable and that startup with inoperable equipment must be the exception rather than the rule."

This staff position allows the licensee to change Specification 3.0.4 to define the conditions under which its requirements apply. Generic Letter 87-09 proposed the following replacement wording for Specification 3.0.4:

"Entry into an OPERATIONAL MODE or other specified condition shall not be made when the conditions for the Limiting Conditions 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 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."

The licensee's proposed change to Specification 3.0.4 conforms to the above staff proposal and is therefore acceptable. With the change to Specification 3.0.4, the Action Statement notes stating when the provisions of Section 3.0.4 do not apply are no longer appropriate, and their deletion is acceptable.

Technical Specification 4.0.3

In the Generic Letter 87-09, the staff took the following position related to Specification 4.0.3:

"It is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed. The opposite is an fact the case; the vast majority of surveillances demonstrate that systems or components in fact are operable. When a surveillance is missed, it is primarily a question of operability that has not been verified by the performance of the required surveillance. Because the allowable outage time limits of some Action Requirements do not provide an appropriate time limit for performing a missed surveillance before shutdown requirements may apply, the Technical Specifications should include a time limit that would allow a delay of the required actions to permit the performance of the missed surveillance.

This time limit should be based on considerations of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, as well as the safety significance of the delay in completion of the surveillance. After reviewing possible limits, the staff has concluded that, based on these considerations, 24-hours would be an acceptable time limit for completing a missed surveillance when the allowable outage times of the Action Requirements are less than this time limit or when shutdown Action Requirements apply. The 24-hour time limit would balance the risks associated with an allowance for completing the surveillance within this period against the risks associated with the alternative is a shutdown to comply with Action Requirements before the surveillance can be completed.

Although a missed surveillance would generally be completed in less time than this 24-hour limit allows, special circumstances may require additional time to ensure that the surveillance can be conducted in a safe manner. The time limits of Action Requirements for surveillances should start when it is identified that Surveillance Requirements have not been performed, except when the 24-hour delay is allowed in the implementation of the Action Requirements. Where the 24-hour time limit is allowed, the time limits of the Action Requirements are applicable either at the end of the 24-hour limit if the surveillance has not been completed or at the time the surveillance is performed if the system or component is found to be inoperable.

Several issues need to be clarified regarding the additional 24-hour time limit. First, this limit does not waive compliance with Specification 4.0.3. Under Specification 4.0.3, the failure to perform a Surveillance Requirement will continue to constitute noncompliance with the Operability Requirements of an LCO and to bring into play the applicable Action Requirements.

Second, Specifications 3.0.2 and 4.0.3 should not be misinterpreted. Specification 3.0.2 notes that a TS is being complied with when the Action Requirements are met within the specified time intervals. Although Specification 4.0.2 provides an allowance for extending the surveillance interval and allows for the completion of the surveillance within this time interval without violation of this Specification, under Specification 4.0.3 nonperformance of a Surveillance Requirement, within the allowed surveillance interval defined by Specification 4.0.2, constitutes a violation of the Operability Requirements of an LCO, as defined by Specification 4.0.3, and is subject to enforcement action. ...

Third, even though an additional 24-hour time limit may apply for missed surveillances, another consideration is the possibility that plant conditions may preclude the performance of the specified requirements. The provision of a 24-hour delay in the application of the Action Requirements for the completion of a missed surveillance would provide time to obtain a temporary waiver of a Surveillance Requirement that could not otherwise be completed because of current plant conditions. If a surveillance can be performed only when the plant is shutdown, there are only two options available to licensees when a missed surveillance is discovered during power operation and continued operation is not allowed under the Action Requirements. The first is to shutdown the plant and perform the required surveillance. The other option is to seek relief from the Surveillance Requirement."

This staff position allows Specification 4.0.3 to be revised to clarify when a missed surveillance constitutes a violation of the Operability Requirements of an LCO and to clarify the applicability of the Action Requirements and the time during which the limits apply. Generic Letter 87-09 proposed the following wording for Specification 4.0.3:

"Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified 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."

Specification 4.0.3 previously included the statement that exceptions to it are stated in individual specifications. This statement is deleted because Specification 4.0.3 is always applicable, i.e., the implied exceptions for individual specifications do not exist.

The licensee has proposed a revised Specification 4.0.3 which is identical to the above staff proposal. The proposed revision to Specification 4.0.3 is therefore acceptable.

Technical Specification 4.0.4

In the Generic Letter 87-09, the staff took the following position relative to Specification 4.0.4:

"The potential for a plant upset and challenge to safety systems is heightened if surveillances are performed during a shutdown to comply with Action Requirements. It is not the intent of Specification 4.0.4 to prevent passage through or to operational modes to comply with Action Requirements and it should not apply when mode changes are imposed by Action Requirements. Accordingly, Specification 4.0.4 should be modified to note that its provisions shall not prevent passage through or to operational modes as required to comply with Action Requirements. A similar provision is included in Specification 3.0.4."

Generic Letter 87-09 proposed the following wording to clarify Specification 4.0.4 for mode changes as a consequence of Action Requirements:

"This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION Requirements."

The licensee has proposed a change to Specification 4.0.4 which is identical to the above staff proposal. The proposed change is therefore acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

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

4.0 CONCLUSION

The Commission made a proposed determination that the amendment involves no significant hazards consideration which was published in the Federal Register (53 FR 22406) on June 15, 1988 and consulted with the State of New Jersey. No public comments were received and the State of New Jersey did not have any comments.

The staff has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security nor to the health and safety of the public.

Principal Contributor: G. Rivenbark

Dated: September 28, 1988