

February 26, 1991

Docket No. 50-336

DISTRIBUTION

Mr. Edward J. Mroczka
Senior Vice President
Nuclear Engineering and Operations
Connecticut Yankee Atomic Power Company
Northeast Nuclear Energy Company
P. O. Box 270
Hartford, Connecticut 06141-0270

Docket file GHill (4)
NRC & L PDRs Wanda Jones
PDI-4 plant JCalvo
SVarga ACRS (10)
EGreenman GPA/PA
SNorris OC/LFMB
GVissing
OGC
DHagan

Dear Mr. Mroczka:

SUBJECT: ISSUANCE OF AMENDMENT (TAC NO. 77535)

The Commission has issued the enclosed Amendment No. 151 to Facility Operating License No. DPR-65 for Millstone Nuclear Power Station, Unit No. 2, in response to your application dated August 9, 1990, as supplemented by letter dated January 10, 1991.

The amendment changes the Millstone Unit 2 Technical Specifications (TS) based on the recommendations provided by the staff in Generic Letter (GL) 87-09 related to the applicability of limiting conditions for operation and the surveillance requirements of the TS 3.0 and 4.0.

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

Sincerely,

151

Guy S. Vissing, Senior Project Manager
Project Directorate I-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No.151 to DPR-65
- 2. Safety Evaluation

cc w/enclosures:
See next page

OFC	:PDI-4:LA	:PDI-4:PM	:PDI-4:D	:OGC	:
NAME	:SNorris	:GVissing/Bah	:JStoltz	:E.Chan	:
DATE	:2/4/91	:2/4/91	:2/5/91	:2/14/91	:

OFFICIAL RECORD COPY
Document Name: AMEND 77535

Defol
" "

Mr. Edward J. Mroczka
Northeast Nuclear Energy Company

cc:

Gerald Garfield, Esquire
Day, Berry and Howard
Counselors at Law
City Place
Hartford, Connecticut 06103-3499

W. D. Romberg, Vice President
Nuclear Operations
Northeast Utilities Service Company
Post Office Box 270
Hartford, Connecticut 06141-0270

Kevin McCarthy, Director
Radiation Control Unit
Department of Environmental Protection
State Office Building
Hartford, Connecticut 06106

Bradford S. Chase, Under Secretary
Energy Division
Office of Policy and Management
80 Washington Street
Hartford, Connecticut 06106

S. E. Scace, Nuclear Station Director
Millstone Nuclear Power Station
Northeast Nuclear Energy Company
Post Office Box 128
Waterford, Connecticut 06385

J. S. Keenan, Nuclear Unit Director
Millstone Unit No. 2
Northeast Nuclear Energy Company
Post Office Box 128
Waterford, Connecticut 06385

Millstone Nuclear Power Station
Unit No. 2

R. M. Kacich, Manager
Generation Facilities Licensing
Northeast Utilities Service Company
Post Office Box 270
Hartford, Connecticut 06141-0270

D. O. Nordquist
Director of Quality Services
Northeast Utilities Service Company
Post Office Box 270
Hartford, Connecticut 06141-0270

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

First Selectmen
Town of Waterford
Hall of Records
200 Boston Post Road
Waterford, Connecticut 06385

W. J. Raymond, Resident Inspector
Millstone Nuclear Power Station
c/o U. S. Nuclear Regulatory Commission
Post Office Box 811
Niantic, Connecticut 06357

Charles Brinkman, Manager
Washington Nuclear Operations
C-E Power Systems
Combustion Engineering, Inc.
12300 Twinbrook Pkwy
Suite 330
Rockville, Maryland 20852



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

NORTHEAST NUCLEAR ENERGY COMPANY
THE CONNECTICUT LIGHT AND POWER COMPANY
THE WESTERN MASSACHUSETTS ELECTRIC COMPANY
DOCKET NO. 50-336
MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 151
License No. DPR-65

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Northeast Nuclear Energy Company, et al. (the licensee), dated August 9, 1990, as supplemented by letter dated January 10, 1991 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-65 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 151, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance, to be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stolz, Director
Project Directorate I-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: February 26, 1991

ATTACHMENT TO LICENSE AMENDMENT NO. 151

FACILITY OPERATING LICENSE NO. DPR-65

DOCKET NO. 50-336

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

<u>Remove</u>	<u>Insert</u>
3/4 0-1	3/4 0-1
3/4 0-2	3/4 0-2
3/4 1-25	3/4 1-25
3/4 3-26	3/4 3-26
3/4 3-31	3/4 3-31
3/4 3-32	3/4 3-32
3/4 3-36	3/4 3-36
3/4 3-43	3/4 3-43
3/4 3-46	3/4 3-46
3/4 3-50	3/4 3-50
3/4 3-56	3/4 3-56
3/4 4-3	3/4 4-3
3/4 4-13	3/4 4-13
3/4 4-21a	3/4 4-21a
3/4 4-22	3/4 4-22
3/4 4-23	3/4 4-23
3/4 6-6	3/4 6-6
3/4 7-1	3/4 7-1
3/4 7-4	3/4 7-4
3/4 7-19	3/4 7-19
3/4 7-33	3/4 7-33
3/4 7-37	3/4 7-37
3/4 7-39	3/4 7-39
3/4 7-41	3/4 7-41
3/4 11-2	3/4 11-2
3/4 11-4	3/4 11-4
3/4 11-5	3/4 11-5
3/4 11-6	3/4 11-6
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 0-4
	B 3/4 0-5
	B 3/4 0-6
	B 3/4 0-7

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the OPERATIONAL MODES 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 a MODE in which the specification does not apply by placing it, as applicable, in:

1. At least HOT STANDBY 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 it is identified that a Limiting Condition for Operation is not met. Exceptions to these requirements are stated in the individual specifications.

3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made when the conditions for the Limiting Condition for Operation are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL MODE or specified condition may be made in accordance with ACTION requirements when conformance to them permits continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

3.0.5 When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered OPERABLE for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is OPERABLE; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are OPERABLE, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied within 2 hours, ACTION shall be initiated to place the unit in a MODE in which the applicable Limiting Condition for Operation does not apply by placing it, as applicable, in:

APPLICABILITY

LIMITING CONDITION FOR OPERATION (Continued)

1. At least HOT STANDBY 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.

This specification is not applicable in MODES 5 or 6.

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES 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 that specified time interval with:

- a. A maximum allowable extension not to exceed 25% of the surveillance time interval, and
- b. The combined time interval for any 3 consecutive surveillance intervals not to 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 MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements.

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

- a. Inservice inspection of ASME Code Class 1, 2 and 3 components and inservice testing 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).

REACTIVITY CONTROL SYSTEMS

POSITION INDICATOR CHANNELS (Continued)

LIMITING CONDITION FOR OPERATION (Continued)

- b) The CEA group(s) with the inoperable indicator is fully inserted, and subsequently maintained fully inserted, while maintaining the withdrawal sequence and THERMAL POWER level required by Specification 3.1.3.6 and when this CEA group reaches its fully inserted position, the "Full In" limit of the CEA with the inoperable position indicator is actuated and verifies this CEA to be fully inserted. Subsequent operation shall be within the limits of Specification 3.1.3.6.
4. If the failure of the position indicator channel(s) is during STARTUP, the CEA group(s) with the inoperable position indicator channel must be moved to the "Full Out" position and verified to be fully withdrawn via a "Full Out" indicator within 4 hours.
- c. With a maximum of one reed switch position indicator channel per group or one pulse counting position indicator channel per group inoperable and the CEA(s) with the inoperable position indicator channel at either its fully inserted position or fully withdrawn position, operation may continue provided:
 1. The position of this CEA is verified immediately and at least once per 12 hours thereafter by its "Full In" or "Full Out" limit (as applicable).
 2. The fully inserted CEA group(s) containing the inoperable position channel is subsequently maintained fully inserted, and
 3. Subsequent operation is within the limits of Specification 3.1.3.6.
- d. With one or more pulse counting position indicator channels inoperable, operation in MODES 1 and 2 may continue for up to 24 hours provided all of the reed switch position indicator channels are OPERABLE.

SURVEILLANCE REQUIREMENTS

4.1.3.3 Each position indicator channel shall be determined to be OPERABLE by verifying the pulse counting position indicator channels and the reed switch position indicator channels agree within 6 steps at least once per 12 hours except during time intervals when the Deviation circuit is inoperable, then compare the pulse counting position indicator and reed switch position indicator channels at least once per 4 hours.

INSTRUMENTATION

3.4.3.3 MONITORING INSTRUMENTATION

RADIATION MONITORING

LIMITING CONDITION FOR OPERATION

3.3.3.1 The radiation monitoring instrumentation channels shown in Table 3.3-6 shall be OPERABLE with their alarm/trip setpoints within the specified limits.

APPLICABILITY: As shown in Table 3.3-6.

ACTION:

- a. With a radiation monitoring channel alarm/trip setpoint exceeding the value shown in Table 3.3-6, adjust the setpoint to within the limit within 2 hours or declare the channel inoperable.
- b. With one or more radiation monitoring channels inoperable, take the ACTION shown in Table 3.3-6. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.1 Each radiation monitoring instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations during the modes and at the frequencies shown in Table 4.3-3.

INSTRUMENTATION

LIMITING CONDITION FOR OPERATION (Continued)

An OPERABLE quadrant symmetric incore detector segment group shall consist of a minimum of three OPERABLE rhodium incore detector segments in 90°F symmetric fuel assemblies.

APPLICABILITY: When the incore detection system is used for:

- a. Monitoring the AZIMUTHAL POWER TILT,
- b. Recalibration of the excore neutron flux detection system, or
- c. Monitoring the UNRODDED INTEGRATED RADIAL PEAKING FACTOR or the linear heat rate.

ACTION:

With the incore detection system inoperable, do not use the system for the above applicable monitoring or calibration functions. The provisions of specifications 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENT

- 4.3.3.2 The incore detection system shall be demonstrated OPERABLE:
- a. By performance of a CHANNEL CHECK within 24 hours prior to its use and at least once per 7 days thereafter when required for:
 1. Monitoring the AZIMUTHAL POWER TILT.
 2. Recalibration of the excore neutron flux detection system.
 3. Monitoring the UNRODDED INTEGRATED RADIAL PEAKING FACTOR or the linear heat rate.
 - b. At least once per 18 months by performance of a CHANNEL CALIBRATION operation which exempts the neutron detectors but includes all electronic components. The neutron detectors shall be calibrated prior to installation in the reactor core.

INSTRUMENTATION

SEISMIC INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.3 The seismic monitoring instrumentation channels shown in Table 3.3-7 shall be OPERABLE.

APPLICABILITY: ALL MODES.

ACTION:

- a. With the number of OPERABLE seismic monitoring channels less than required by Table 3.3-7, restore the inoperable channel(s) to OPERABLE status within 30 days. The provisions of Specification 3.0.3 are not applicable.
- b. With one or more seismic monitoring 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 system to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.3.3.3 Each of the above seismic monitoring instrumentation channels shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequencies shown in Table 4.3-4.

INSTRUMENTATION

METEOROLOGICAL INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.4 The meteorological monitoring instrumentation channels shown in Table 3.3-8 shall be OPERABLE.

APPLICABILITY: ALL MODES

- a. With the number of OPERABLE meteorological monitoring channels less than required by Table 3.3-8, suspend all release of gaseous radioactive material from the radwaste gas decay tanks until the inoperable channel(s) is restored to OPERABLE status. The provisions of Specification 3.0.3 are not applicable.
- b. With one or more required meteorological monitoring channels inoperable for more than 7 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.

SURVEILLANCE REQUIREMENTS

4.3.3.4 Each meteorological monitoring instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in TABLE 4.3-5.

INSTRUMENTATION

FIRE DETECTION INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.7 As a minimum, the fire detection instrumentation for each fire detection zone shown in Table 3.3-10 shall be OPERABLE.

APPLICABILITY: Whenever equipment in that fire detection zone is required to be OPERABLE.

ACTION:

With the number of OPERABLE fire detection instrument(s) less than the minimum number of OPERABLE requirements of Table 3.3-10:

- a. Within 1 hour establish a fire watch patrol to inspect the zone(s) with the inoperable instrument(s) at least once per hour unless the instrument(s) is located inside the containment, then inspect the containment at least once per 8 hours or monitor the containment air temperatures at least once per hour at the locations listed in Specification 4.6.1.5.
- b. Restore the inoperable instrument(s) to OPERABLE status within 14 days or, in lieu of any other report required by Specification 6.6.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the instrument(s) to OPERABLE status.
- c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.7.1 Each of the above required fire detection instruments which are accessible during plant operation shall be demonstrated OPERABLE at least once per 6 months by performance of a CHANNEL FUNCTIONAL TEST. Fire detectors which are not accessible during plant operation shall be demonstrated OPERABLE by the performance of a CHANNEL FUNCTIONAL TEST during each COLD SHUTDOWN exceeding 24 hours unless performed in the previous 6 months.

4.3.3.7.2 The circuitry associated with the supervision of the above fire detection instruments and circuits, per NFPA 72-D, shall be demonstrated OPERABLE at least once per 6 months.

4.3.3.7.3 The nonsupervised circuits, associated with detector alarms, between the instrument and the control room shall be demonstrated OPERABLE at least once per 31 days.

INSTALLATION

ACCIDENT MONITORING

LIMITING CONDITION FOR OPERATION

3.3.3.8 The accident monitoring instrumentation channels shown in Table 3.3-11 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. Actions per Table 3.3-11.

SURVEILLANCE REQUIREMENTS

4.3.3.8 Each accident monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-7.

INSTRUMENTATION

RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.9 The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.3-12 shall be OPERABLE with applicable alarm/trip setpoints set to ensure that the limits of Specification 3.11.1.1 are not exceeded. The setpoints shall be determined in accordance with methods and parameters as described in the ODCM.

APPLICABILITY: As shown in Table 3.3-12.

ACTION:

- a. With a radioactive liquid effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, without delay 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 the number of channels less than the minimum channels operable requirement, take the ACTION shown in Table 3.3-12. Exert best efforts to restore the inoperable monitor to OPERABLE status within 30 days and, if unsuccessful, explain in the next Semiannual Effluent Report why the inoperability was not corrected in a timely manner. Releases need not be terminated after 30 days provided the specified actions are continued.
- c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.9 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 operations at the frequencies shown in Table 4.3-12.

INSTRUMENTATION

RADIOACTIVE GASEOUS EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.10 The radioactive gaseous effluent monitoring instrumentation channels shown in Table 3.3-13 shall be OPERABLE with applicable alarm/trip setpoints set to ensure that the limits of Specification 3.11.2.1 are not exceeded. The setpoints shall be determined in accordance with methods and parameters as described in the ODCM.

APPLICABILITY: As shown in Table 3.3-13.

ACTION:

- a. With a radioactive gaseous effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, without delay 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 the number of channels less than the minimum channels (OPERABLE requirement, take the ACTION shown in Table 3.3-13. Exert best efforts to restore the inoperable monitor to OPERABLE status within 30 days and, if unsuccessful, explain in the next Semiannual Effluent Report why the inoperability was not corrected in a timely manner. Releases need not be terminated after 30 days provided the specified actions are continued.
- c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.10 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 operations at the frequencies shown in Table 4.3-13.

REACTOR COOLANT SYSTEM

RELIEF VALVES

LIMITING CONDITION FOR OPERATION

3.4.3 Two power operated relief valves (PORVs) and their associated block valves shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. With one or more PORV(s) inoperable, within 8 hours either restore the PORV(s) to OPERABLE status or close the associated block valve(s) and remove power from the block valve(s); otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With one or more block valve(s) inoperable, within 8 hours either restore the block valve(s) to OPERABLE status or close the block valve(s) and remove power from the block valve(s); otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.4.3.1 Each PORV shall be demonstrated OPERABLE:

- a. Once per 31 days by performance of a CHANNEL FUNCTIONAL TEST, excluding valve operation, and
- b. Once per 18 months by performance of a CHANNEL CALIBRATION.

4.4.3.2 Each block valve shall be demonstrated OPERABLE once per 92 days by operating the valve through one complete cycle of full travel. This demonstration is not required if a PORV block valve is closed and power removed to meet Specification 3.4.3 a or b.

REACTOR COOLANT SYSTEM

SPECIFIC ACTIVITY

LIMITING CONDITION FOR OPERATION

3.4.8 The specific activity of the primary coolant shall be limited to:

- a. $\leq 1.0 \mu\text{Ci/gram DOSE EQUIVALENT I-131}$, and
- b. $\leq 100/\bar{E} \mu\text{Ci/gram}$.

APPLICABILITY: MODES 1, 2, 3, 4, and 5.

ACTION:

MODES 1, 2, and 3*:

- a. With the specific activity of the primary coolant $> 1.0 \mu\text{Ci/gram DOSE EQUIVALENT I-131}$ but within the allowable limit (below and to the left of the line) shown on Figure 3.4-1, operation may continue for up to 48 hours. Entry into an OPERATIONAL MODE or other specified condition is permitted pursuant to Specification 3.0.4 when subject to this ACTION statement.
- b. With the specific activity of the primary coolant $> 1.0 \mu\text{Ci/gram DOSE EQUIVALENT I-131}$ for more than 48 hours during one continuous time interval or exceeding the limit line shown on Figure 3.4-1, be in HOT STANDBY with $T_{\text{avg}} < 515^\circ\text{F}$ within 4 hours.
- c. With the specific activity of the primary coolant $> 100/\bar{E} \mu\text{Ci/gram}$, be in HOT STANDBY with $T_{\text{avg}} < 515^\circ\text{F}$ within 4 hours.

MODES 1, 2, 3, 4 and 5:

- d. With the specific activity of the primary coolant $> 1.0 \mu\text{Ci/gram DOSE EQUIVALENT I-131}$ or $> 100/\bar{E} \mu\text{Ci/gram}$, perform the sampling and analysis requirements of item 4 a) of Table 4.4-2 until the specific activity of the primary coolant is restored to within its limits.

*With $T_{\text{avg}} \geq 515^\circ\text{F}$.

REACTOR COOLANT SYSTEM

OVERPRESSURE PROTECTION SYSTEMS

LIMITING CONDITION FOR OPERATION

3.4.9.3 At least one of the following overpressure protection systems shall be OPERABLE:

- a. Two power operated relief valves (PORVs) with a lift setting of ≤ 450 psig, or
- b. A reactor coolant system vent of ≥ 1.3 square inches.

APPLICABILITY: When the temperature of one or more of the RCS cold legs is $\leq 275^{\circ}\text{F}$, except when the reactor vessel head is removed.

ACTION:

- a. With one PORV inoperable, either restore the inoperable PORV to OPERABLE status within 7 days or depressurize and vent the RCS through a ≥ 1.3 square inch vent(s) within the next 8 hours; maintain the RCS in a vented condition until both PORVs have been restored to OPERABLE status.
- b. With both PORVs inoperable, depressurize and vent the RCS through a ≥ 1.3 square inch vent(s) within 8 hours; maintain the RCS in a vented condition until both PORVs have been restored to OPERABLE status.
- c. In the event either the PORVs or the RCS vent(s) are used to mitigate a RCS pressure transient, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 within 30 days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or vent(s) on the transient and any corrective action necessary to prevent recurrence.

REACTOR COOLANT SYSTEM

STRUCTURAL INTEGRITY

LIMITING CONDITION FOR OPERATION

3.4.10 The structural integrity of ASME Code Class 1, 2, and 3 components shall be maintained in accordance with Specification 4.4.10.

APPLICABILITY: ALL MODES

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) 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 to within its limit or isolate the affected component from service.

SURVEILLANCE REQUIREMENTS

4.4.10 In addition to the inspection requirements for ASME Code Classes 1, 2, and 3 components delineated in Specification 4.0.5, each Reactor Coolant Pump flywheel shall be inspected per the recommendations of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, August 1975.

REACTOR COOLANT SYSTEM

REACTOR COOLANT SYSTEM VENTS

LIMITING CONDITION FOR OPERATION

- 3.4.11 At least one reactor coolant system vent path consisting of at least two valves in series capable of being powered from emergency buses shall be OPERABLE and closed at each of the following locations:
- a. Reactor Vessel head
 - b. Pressurizer stream space

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With the Pressurizer vent path inoperable, STARTUP and/or POWER OPERATION may continue provided that i) the inoperable vent path is maintained closed with power removed from the valve actuator of all the valves in the inoperable vent path and ii) one power operated relief valve (PORV) and its associated block valve is OPERABLE; otherwise, restore either the inoperable vent path or one PORV and its associated block valve to OPERABLE status within 30 days, or 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 path to OPERABLE status.
- b. With the Reactor Vessel Head vent path inoperable, STARTUP and/or POWER OPERATION may continue provided that the inoperable vent path is maintained closed with power removed from the valve actuator of all the valves in the inoperable vent path; restore the Reactor Vessel Head vent path to OPERABLE status within 30 days or 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 path to OPERABLE status.

SURVEILLANCE REQUIREMENTS

- 4.4.11 Each reactor coolant system vent path shall be demonstrated OPERABLE at least once per 18 months by:
1. Verifying all manual isolation valves in each vent path are locked in the open position.
 2. Cycling each valve in the vent path through at least once complete cycle of full travel from the control room during COLD SHUTDOWN or REFUELING.
 3. Verifying flow through the reactor coolant vent system vent paths during venting during COLD SHUTDOWN or REFUELING.

CONTAINMENT SYSTEMS

CONTAINMENT AIR LOCKS

LIMITING CONDITION FOR OPERATION

3.6.1.3 The containment air lock shall be OPERABLE with:

- a. Both doors closed except when the air lock is being used for normal transit entry and exit through the containment, then at least one air lock door shall be closed, and
- b. An overall air lock leakage rate of $\leq 0.05 L_a$ at P_a (54 psig).

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With one containment air lock door inoperable:
 1. Maintain at least the OPERABLE air lock door closed and either restore the inoperable air lock door to OPERABLE status within 24 hours or lock the OPERABLE air lock door closed.
 2. Operation may then continue until performance of the next required overall air lock leakage test provided that the OPERABLE air lock door is verified to be locked closed at least once per 31 days.
 3. Otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
 4. Entry into an OPERATIONAL MODE or other specified condition under the provisions of Specification 3.0.4 shall not be made if the inner air lock door is inoperable.
- b. With the containment air lock inoperable, except as the result of an inoperable air lock door, maintain at least one air lock door closed; restore the inoperable air lock to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.6.1.3 Each containment air lock shall be demonstrated OPERABLE:

- a. After each opening, except when the air lock is being used for multiple entries, then at least once per 72 hours, by verifying no detectable seal leakage by pressure decay when the volume between the door seals is pressurized to greater than or equal to 25 psig for at least 15 minutes.

3/4.7 PLANT SYSTEMS

3.4.7.1 TURBINE CYCLE

SAFETY VALVES

LIMITING CONDITION FOR OPERATION

3.7.1.1 All main steam line code safety valves shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. With both reactor coolant loops and associated steam generators in operation and with one or more main steam line code safety valves inoperable, operation in MODES 1, 2, and 3 may proceed provided, that within 4 hours, either the inoperable valve is restored to OPERABLE status or the Power Level-High trip setpoint is reduced per Table 3.7-1; otherwise, be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

SURVEILLANCE REQUIREMENTS

4.7.1.1 Each main steam line code safety valve shall be demonstrated OPERABLE, with lift settings and orifice sizes as shown in Table 4.7-1, in accordance with Specification 4.0.5.

PLANT SYSTEMS

AUXILIARY FEEDWATER PUMPS

LIMITING CONDITIONS FOR OPERATION

3.7.1.2 At least three steam generator auxiliary feedwater pumps shall be OPERABLE with:

- a. Two feedwater pumps capable of being powered from separate OPERABLE emergency busses, and
- b. One feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. With one auxiliary feedwater pump inoperable, restore the required auxiliary feedwater pumps to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. With two auxiliary feedwater pumps inoperable be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.
- c. With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status as soon as possible. Entry into an OPERATIONAL MODE or other specified condition under the provisions of Specification 3.0.4 shall not be made with three auxiliary feedwater pumps inoperable.

SURVEILLANCE REQUIREMENTS

4.7.1.2 Each auxiliary feedwater pump shall be demonstrated OPERABLE:

- a. At least once per 31 days by:
 1. Starting each pump from the control room,
 2. Verifying that:
 - a) Each motor driven pump develops a discharge pressure of ≥ 1070 psig on recirculation flow, and
 - b) The steam turbine driven pump develops a discharge pressure of ≥ 1080 psig on recirculation flow when the secondary steam supply pressure is greater than 800 psig. The provisions of Specification 4.0.4 are not applicable for entry into Mode 3.

PLANT SYSTEMS

3/4.7.7 SEALED SOURCE CONTAMINATION

LIMITING CONDITION FOR OPERATION

3.7.7.1 Each sealed source containing radioactive material either in excess of those quantities of byproduct material listed in 10 CFR 30.71 or 0.1 microcuries, including alpha emitters, shall be free of ≥ 0.005 microcuries of removable contamination.

APPLICABILITY: AT ALL TIMES.

ACTION:

- a. Each sealed source with removable contamination in excess of the above limit shall be immediately withdrawn from use and:
 1. Either decontaminated and repaired, or
 2. Disposed of in accordance with Commission Regulations.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.7.1.1 Test Requirements - 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.

4.7.7.1.2 Test Frequencies - Each category of sealed sources shall be tested at the frequencies described below.

- a. Sources in use (excluding startup sources previously subjected to core flux) - At least once per six months for all sealed sources containing radioactive material:

PLANT SYSTEMS

3/4.7.9 FIRE SUPPRESSION SYSTEMS

FIRE SUPPRESSION WATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.9.1 The fire suppression water system shall be OPERABLE with:

- a. Three high pressure pumps, each with a capacity of at least 1800 gpm, with their discharge aligned to the fire suppression header,
- b. Two water supplies, each with a minimum contained volume of 200,000 gallons, and
- c. An OPERABLE flow path capable of taking suction from the fire water tanks and transferring the water through distribution piping with OPERABLE sectionalizing control or isolation valves to the yard hydrant curb valves and the first valve ahead of the water flow alarm device on each sprinkler, hose standpipe or spray system riser required to be OPERABLE per Specifications 3.7.9.2 and 3.7.9.3.

APPLICABILITY: At all times.

ACTION:

- a. With one pump and/or one water supply inoperable, restore the inoperable equipment to OPERABLE status within 7 days or, in lieu of any other report required by Specification 6.6.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the plans and procedures to be used to provide for the loss of redundancy in this system. The provisions of Specification 3.0.3 are not applicable.
- b. With two pumps inoperable, establish a continuous fire watch of the turbine building with backup fire suppression equipment within 1 hour; restore the inoperable equipment to OPERABLE status within 14 days or, 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 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the equipment to OPERABLE status. The provisions of Specification 3.0.3 are not applicable.

PLANT SYSTEMS

SPRAY AND/OR SPRINKLER SYSTEMS

LIMITING CONDITION FOR OPERATION

3.7.9.2 The following spray and/or sprinkler systems shall be OPERABLE:

- a. Diesel Generator Rooms
- b. Diesel Generator Day Tank Rooms
- c. Cable Vault (Aux. Building)
 - 1. Sprinkler
 - 2. Deluge
- d. Cable Vault (Turbine Building)
- e. Hydrogen Seal Oil Unit
- f. Turbine Building Northeast Corner
- g. Turbine Building 31'6"/14'6" - North
- h. Turbine Building 31'6"/14'6" - South
- i. Lube Oil Room
- j. Aux. Building (-45'6") General Area
- k. Aux. Building (14'6") Truck Access
- l. Turbine Bearing
- m. Steam Generator Feed Pumps

APPLICABILITY: Whenever equipment in the spray/sprinkler protected areas is required to be OPERABLE.

ACTION:

- a. With one or more of the above required spray and/or systems inoperable, establish a continuous fire watch with backup fire suppression equipment for the unprotected area(s) within 1 hour; restore the system to OPERABLE status within 14 days or, in lieu of any other report required by Specification 6.6.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENT

4.7.9.2 Each of the above required spray and/or sprinkler systems shall be demonstrated OPERABLE:

PLANT SYSTEMS

FIRE HOSE STATIONS

LIMITING CONDITION FOR OPERATION

3.7.9.3 The fire hose stations shown in Table 3.7-2 shall be OPERABLE.

APPLICABILITY: Whenever equipment in the areas protected by the fire hose stations is required to be OPERABLE.*

ACTION:

- a. With one or more of the fire hose stations shown in Table 3.7-2 inoperable, route an additional equivalent capacity fire hose to the unprotected area(s) from an OPERABLE hose station within 1 hour or establish a continuous fire watch with backup fire suppression equipment for the unprotected area(s). If the inoperable hose station(s) is not the primary means of fire suppression, then route the additional fire hose(s) or establish a continuous fire watch with fire suppression equipment within 24 hours.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.9.3 Each of the fire hose stations shown in Table 3.7-2 shall be demonstrated OPERABLE:

- a. At least once per 31 days by visual inspection of the station to assure all required equipment is at the station. The exception to the above will be the containment hose stations. The equipment will be located outside containment except when the unit is in cold shutdown.
- b. At least once per 18 months by:
 1. Removing the hose for inspection and re-racking, and
 2. Replacement of all degraded gaskets in couplings.
- c. At least once per 3 years by:
 1. Partially opening each hose station valve to verify valve OPERABILITY and no flow blockage.
 2. Conducting a hose hydrostatic test at a pressure at least 50 psig greater than the maximum pressure available at that hose station.

*Containment hose stations shall be operable in MODE 5 when required to support maintenance activities and MODE 6.

PLANT SYSTEMS

3/4.7.10 PENETRATION FIRE BARRIERS

LIMITING CONDITION FOR OPERATION

3.7.10 All fire rated assemblies (walls, floor/ceilings, cable tray enclosures, and other fire barriers) separating safety-related fire areas or separating portions of redundant systems important to safe shutdown within a fire area and all sealing devices in fire rated assembly penetrations (fire doors, fire windows, fire dampers, cable, piping, and ventilation duct penetration seals) shall be OPERABLE.

APPLICABILITY: At all times unless otherwise determined that the separation of safety-related fire areas or separating portions of redundant systems important to safe shutdown within a fire area is not required based on the MODE of operation.

ACTION:

- a. With one or more of the above required fire rated assemblies and/or penetration sealing devices inoperable, within 1 hour:
 1. Determine that the fire areas/zones on both sides of the affected fire rated assembly and/or penetration sealing device are monitored by either an OPERABLE fire detection or automatic suppression system at the fire barrier and establish a fire watch patrol that inspects both areas at least once per hour, or
 2. Establish a continuous fire watch on at least one side of the affected fire rated assembly and/or penetration seal, or
 3. Temporarily repair the inoperable fire rated assembly and/or sealing device and classify it as temporary.

All temporary or inoperable fire rated assemblies and/or sealing devices shall be permanently repaired within 30 days, or implement ACTION 1 or 2 above.

- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.10 The above required fire rated assemblies and penetration sealing devices shall be verified to be OPERABLE by a visual inspection:

- a. At least once per 18 months for fire doors and fire dampers.
- b. At least once per 18 months for fire barrier penetration seals, on at least 10% of the total number of penetration seals. If any of the penetration seals in the inspection sample are found to be inoperable, then an additional 10% sample of the total number of penetration seals shall be visually inspected. Sampling and inspection shall continue until all of the seals in a sample are found OPERABLE or 100% of the seals are inspected.
- c. Prior to returning a fire rated assembly and/or penetration sealing device to OPERABLE status following repairs or maintenance.

RADIOACTIVE EFFLUENTS

DOSE, LIQUIDS

LIMITING CONDITION FOR OPERATION

3.11.1.2 The dose or dose commitment to any REAL MEMBER OF THE PUBLIC from radioactive materials in liquid effluents from Unit 2 released from the site (see Figure 5.1-1) shall be limited:

- a. During any calendar quarter to ≤ 1.5 mrem to the total body and to ≤ 5 mrem to any organ, and
- b. During any calendar year to ≤ 3 mrem to the total body and to ≤ 10 mrem 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 which identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to reduce the releases of radioactive materials in liquid effluents during the remainder of the current calendar quarter and during the remainder of the calendar year so that the cumulative dose or dose commitment to any REAL MEMBER OF THE PUBLIC from such releases during the calendar year is within 3 mrem to the total body and 10 mrem to any organ.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1.2.1 Dose Calculations. Cumulative dose contributions from liquid effluents shall be determined in accordance with Section II of the REMODCM.

4.11.1.2.2 Relative accuracy of conservatism of the calculations shall be confirmed by performance of the Radiological Environmental Monitoring Program as detailed in the REMODCM.

RADIOACTIVE EFFLUENTS

DOSE, NOBLE GASES

SURVEILLANCE REQUIREMENTS

3.11.2.2 The air dose offsite (see Figure 5.1-1) due to noble gases released from Unit 2 in gaseous effluents shall be limited to the following:

- a. During any calendar quarter, to ≤ 5 mrad for gamma radiation and ≤ 10 mrad for beta radiation;
- b. During any calendar year, to ≤ 10 mrad for gamma radiation and ≤ 20 mrad 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 which identifies the cause(s) for exceeding the limit(s) and defines the corrective actions to be taken to reduce the releases of radioactive noble gases in gaseous effluents during the remainder of the current calendar quarter and during the remainder of the current calendar year so that the cumulative dose during the calendar year is within 10 mrad for gamma radiation and 20 mrad for beta radiation.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.2.1 Dose Calculations. Cumulative dose contributions for the current calendar quarter and current calendar year shall be determined in accordance with Section II of the REMODCM once every 31 days.

4.11.2.2.2 Relative accuracy or conservatism of the calculations shall be confirmed by performance of the Radiological Environmental Monitoring Program as detailed in Section I of the REMODCM.

RADIOACTIVE EFFLUENTS

DOSE, RADIOIODINES, RADIOACTIVE MATERIAL IN PARTICULATE FORM, AND RADIONUCLIDES OTHER THAN NOBLE GASES

LIMITING CONDITION FOR OPERATION

3.11.2.3 The dose to any REAL MEMBER OF THE PUBLIC from iodine-131, iodine-133, tritium and radioactive materials in particulate form with half lives greater than 8 days in gaseous effluents from Unit 2 released offsite (see Figure 5.1-1) shall be limited to the following:

- a. During any calendar quarter to ≤ 7.5 mrem to any organ;
- b. During any calendar year to ≤ 15 mrem to any organ.

APPLICABILITY: At all times.

ACTION:

- a. With the calculated dose from the release of radioiodines, radioactive materials in particulate form, or radionuclides other than 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 which identifies the cause(s) for exceeding the limit and defines the corrective actions to be taken to reduce the releases during the remainder of the current calendar quarter and during the remainder of the calendar year so that the cumulative dose or dose commitment to any REAL MEMBER OF THE PUBLIC from such releases during the calendar year is within 15 mrem to any organ.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.2.3.1 Dose Calculations. Cumulative dose contributions for the current calendar quarter and current calendar year shall be determined in accordance with Section II of the REMODCM once every 31 days.

4.11.2.3.2 Relative accuracy or conservatism of the calculations shall be confirmed by performance of the Radiological Environmental Monitoring Program as detailed in Section I of the REMODCM.

RADIOACTIVE EFFLUENTS

3/4 11.3 TOTAL DOSE

LIMITING CONDITION FOR OPERATION

3.11.3 The dose of dose commitment to a REAL MEMBER OF THE PUBLIC from the Millstone Site is limited to ≤ 25 mrem to the total body or any organ (except the thyroid, which is limited to ≤ 75 mrem) over a period of 12 consecutive months.

APPLICABILITY: At all times.

ACTION:

- a. With the calculated dose from the release of radioactive materials in liquid or gaseous effluents exceeding twice the limits of Specifications 3.11.1.2, 3.11.2.2, or 3.11.2.3, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 and limit the subsequent releases such that the dose or dose commitment to any REAL MEMBER OF THE PUBLIC from the Millstone Site is limited to ≤ 25 mrem to the total body or any organ (except thyroid, which is limited to ≤ 75 mrem) over 12 consecutive months. This Special Report shall include an analysis which demonstrates that radiation exposures to any REAL MEMBER OF THE PUBLIC from the Millstone Site (including all effluent pathways and direct radiation) are less than the 40 CFR Part 190 Standard. If the estimated doses exceed the above limits, the special report shall include a request for a variance in accordance with the provisions of 40 CFR 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

4.11.3 Dose Calculations. Cumulative dose contributions from liquid and gaseous effluents and direct radiation from the Millstone Site shall be determined in Specifications 4.11.1.2.1, 4.11.2.2.1 and 4.11.2.3.1 and in accordance with Section II of the REMODCM once per 31 days.

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.0 APPLICABILITY

BASES

Specification 3.0.1 through 3.0.4 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, 10CFR50.36(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."

Specification 3.0.1 establishes the Applicability statement within each individual specification as the requirement for when (i.e., in which OPERATIONAL MODES 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.

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 a MODE or condition in which the specification no longer applies. 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.

The specific 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

3/4.0 APPLICABILITY

BASES (Con't)

limits of 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 a MODE in which a new specification becomes applicable. In this case, the 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.

Specification 3.0.2 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. The purpose of this specification is to delineate the time limits for placing the unit in a 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. 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 MODES 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 it is identified that a Limiting Condition for Operation is not met. 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.

APPLICABILITY

BASES

The time limits of Specification 3.0.3 allow 37 hours for the plant to be in the COLD SHUTDOWN MODE when a shutdown is required during the POWER MODE of operation. If the plant is in a lower MODE of operation when a shutdown is required, the time limit for reaching the next lower MODE of operation applies. However, if a lower MODE of operation is reached in less time than allowed, the total allowance time to reach COLD SHUTDOWN, or other applicable MODE, is not reduced. For example, if HOT STANDBY 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 MODE 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 a MODE 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 MODE 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 MODE of operation.

The shutdown requirements of Specification 3.0.3 do not apply in MODES 5 and 6, because the ACTION requirements of individual specifications define the remedial measures to be taken.

Specification 3.0.4 establishes limitations on MODE changes when a Limiting Condition for Operation is not met. It precludes placing the facility in a higher MODE 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 MODES were permitted. The purpose of this specification is to ensure that facility operation is not initiated or that higher MODES 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 MODE change. Therefore, in this case, entry into an OPERATIONAL MODE or other specified condition may be made in accordance with the provision 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.

APPLICABILITY

BASES (Con't)

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 MODE of operation.

Specification 3.0.5 delineates what additional conditions must be satisfied to permit operation to continue, consistent with the ACTION statements for power sources, when a normal or emergency power source is not OPERABLE. It specifically prohibits operation when one division is inoperable because its normal or emergency power source is inoperable and a system, subsystem, train, component or device in another division is inoperable for another reason.

The provisions of this specification permit the ACTION statements associated with individual systems, subsystems, trains, components, or devices to be consistent with the ACTION statements of the associated electrical power source. It allows operation to be governed by the time limits of the ACTION statement associated with the Limiting Condition for Operation for the normal or emergency power source, not the individual ACTION statements for each system, subsystem, train, component or device that is determined to be inoperable solely because of the inoperability of its normal or emergency power source.

For example, Specification 3.8.1.1 requires in part that two emergency diesel generators be OPERABLE. The ACTION statement provides for a 72-hour out-of-service time when one emergency diesel generator is not OPERABLE. If the definition of OPERABLE were applied without consideration of Specification 3.0.5, all systems, subsystems, trains, components and devices supplied by the inoperable emergency power source would also be inoperable. This would dictate invoking the applicable ACTION statement for each of the applicable Limiting Conditions for Operation. However, the provisions of Specification 3.0.5 permit the time limits for continued operation to be consistent with the ACTION statement for the inoperable emergency diesel generator instead, provided the other specified conditions are satisfied. In this case, this would mean that the corresponding normal power source must be OPERABLE, and all redundant systems, subsystems, trains, components, and devices must be OPERABLE, or otherwise satisfy Specification 3.0.5 (i.e., be capable of performing their design function and have at least one normal or one emergency power source OPERABLE). If they are not satisfied, action is required in accordance with this specification.

As a further example, Specification 3.8.1.1 requires in part that two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system be OPERABLE. The ACTION statement provides a 24-hour out-of-service time when both required offsite circuits are not OPERABLE. If the definition of OPERABLE were applied without consideration of Specification 3.0.5, all systems, subsystems, trains, components and devices supplied by the inoperable normal power sources, both of the offsite circuits, would also be inoperable. This would dictate invoking the applicable ACTION statements for each of the applicable LCOs. However, the provisions of Specification 3.0.5 permit the time limits for continued operation to

BASES (Con't)

be consistent with the ACTION statement for the inoperable normal power sources instead, provided the other specified conditions are satisfied. In case, this would mean that for one division the emergency power source must be OPERABLE (as must be the components supplied by the emergency power source) and all redundant systems, subsystems, trains, components and devices in the other division must be OPERABLE, or likewise satisfy Specification 3.0.5 (i.e., be capable of performing their design functions and have an emergency power source OPERABLE). In other words, both emergency power sources must be OPERABLE and all redundant systems, subsystems, trains, components and devices in both divisions must also be OPERABLE. If these conditions are not satisfied, action is required in accordance with this specification.

In MODES 5 and 6 Specification 3.0.5 is not applicable, and thus the individual ACTION statements for each applicable Limiting Condition for Operation in these MODES must be adhered to.

Specification 4.0.1 through 4.0.5 establish the general requirements applicable to Surveillance Requirements. These requirements are based on the Surveillance Requirements stated in the Code of Federal Regulations, 10CFR50.36(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."

Specification 4.0.1 establishes the requirement that surveillances must be performed during the OPERATIONAL MODES or other conditions for which the requirements of the Limiting Conditions for Operation apply unless otherwise stated in an individual Surveillance Requirements. 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 a MODE or other specified condition for which the associated Limiting Conditions for Operation are applicable. Surveillance Requirements do not have to be performed when the facility is in an OPERATIONAL MODE 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.

Specification 4.0.2 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

3/4.0 APPLICABILITY

BASES (Con't)

surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Specification 4.0.3 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 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 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.

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 is required to comply with ACTION requirements or before other remedial measures would be required that may preclude 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. 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.

3/4.0 APPLICABILITY

BASES (Con't)

Specification 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL MODE or other 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 a MODE or condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL MODES 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 ensure 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 MODE of operation.

Specification 4.0.5 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 MODE or other specified condition takes precedence over the ASME Boiler and Pressure Vessel Code provision which 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, that is not capable of performing its specified function, is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision which 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

RELATED TO AMENDMENT NO. 151

TO FACILITY OPERATING LICENSE NO. DPR-65

NORTHEAST NUCLEAR ENERGY COMPANY, ET AL.

MILLSTONE NUCLEAR POWER STATION, UNIT NO. 2

DOCKET NO. 50-336

INTRODUCTION

By application for license amendment dated August 9, 1990, as supplemented by letter dated January 10, 1991, Northeast Nuclear Energy Company, et al. (the licensee), requested changes to Millstone Unit 2 Technical Specifications (TS). The January 10, 1991 submittal provided additional information regarding TS 3.0 and did not change our initial no significant hazards consideration determination.

The proposed amendment would change the Millstone Unit 2 Technical Specifications based on the recommendations provided by the staff in Generic Letter (GL) 87-09 related to the applicability of limiting conditions for operations (LCO) and the surveillance requirements of the TS 3.0 and 4.0. Specifically, the licensee has requested the following revisions to TS 3.0.3, 3.0.4, 4.0.3 and 4.0.4:

Specification 3.0.3 would be revised to more clearly define when the ACTION requirements are applicable.

Specification 3.0.4 would be 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.

Specification 4.0.3 would be 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 would be revised to clarify that "This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with Action Requirements."

In addition to the above, a substantial number of Limiting Conditions for Operation would be changed, consistent with the proposed changes to TS 3.0.4.

Discussion

On June 4, 1987, the NRC issued Generic Letter 87-09, "Section 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements." GL 87-09 addresses recommended improvements in the wording of TS 3.0.4, 4.0.3 and 4.0.4.

EVALUATION

GL 87-09 recognizes, in part, that Specification 3.0.4 unduly restricts facility operation when conformance to the Action Requirements provides an acceptable level of safety for continued operation in any mode. For a 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. The restriction on 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 or where entry into that operational mode would result in entry into an Action Statement with such time constraints. However, nothing in the staff position stated in GL 87-09 should be interpreted as endorsing or encouraging plant startup with inoperable equipment. The GL 87-09 itself states that startup with inoperable equipment should be the exception rather than the rule.

With respect to Specification 3.0.3, the licensee has proposed to define the time when ACTION requirements are taken as measured from the time "it is identified that a Limiting Condition for Operation is not met." This more clearly defines the time "of failure to meet the Limiting Conditions for Operation." Thus, we have determined the proposed change to be acceptable.

Consistent with the guidance of GL 87-09, the licensee has proposed the following wording for TS 3.0.4:

3.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made when the conditions for the Limiting Condition for Operation are not met and the associated ACTION requires a shutdown if they are not met within a specified time interval. Entry into an OPERATIONAL MODE or specified condition may be made in accordance with ACTION requirements when conformance to them permit continued operation of the facility for an unlimited period of time. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual specifications.

With regard to TS 4.0.3, in GL 87-09 the staff stated that it is overly conservative to assume that systems or components are inoperable when a surveillance requirement has not been performed, because the vast majority of surveillances demonstrate that systems or components in fact are operable. 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 apply, the TS 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 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 potential for a plant upset and challenge to safety systems when the alternative is a shutdown to comply with Action Requirements before the surveillance can be completed.

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.

Based on the guidance in GL 87-09, the following change to Specification 4.0.3 was proposed:

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. Compliance with 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.

TS 4.0.4 prohibits entry into an OPERATIONAL CONDITION or other specified condition until all required surveillances have been performed. This could cause an interpretation problem when OPERATIONAL CONDITION changes are required in order to comply with ACTION statements. Specifically, two possible conflicts between TSs 4.0.3 and 4.0.4 could exist. The first conflict arises because TS 4.0.4 prohibits entry into an operational mode or other specified condition when surveillance requirements have not been

performed within the specified surveillance interval. The licensee's proposed modification to resolve this conflict involves the revision to TS 4.0.3 to permit a delay of up to 24 hours in the application of the Action Requirements, as explained above, and a clarification of TS 4.0.4 to allow passage through or to operational modes as required to comply with Action Requirements. The second potential conflict between TSs 4.0.3 and 4.0.4 arises because an exception to the requirements of 4.0.4 is allowed when surveillance requirements can only be completed after entry into a mode or condition. However, after entry into this mode or condition the requirements of TS 4.0.3 may not be met because the surveillance requirements may not have been performed within the allowable surveillance interval.

The licensee proposes to resolve these conflicts by providing the following clarifying statement to TS 4.0.4:

This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements.

The NRC staff has provided in GL 87-09 a clarification that: (a) it is not the intent of TS 4.0.3 that the Action Requirements preclude the performance of surveillances allowed under any exception to TS 4.0.4; and (b) that the delay of up to 24 hours in TS 4.0.3 for the applicability of Action Requirements provides an appropriate time limit for the completion of surveillance requirements that become applicable as a consequence of any exception to TS 4.0.4.

The licensee has proposed a number of change to the Limiting Conditions for Operation (LCO, Section 3) TS, consistent with the proposed change to TS 3.0.4. In the existing LCOs, conditions are noted where operational mode changes are permitted even though a shutdown is required in a specified time interval. These conditions are maintained through proposed change to the TS and no new conditions are proposed.

In issuing GL 87-09, the NRC staff was aware of the potential for abuse of the proposed revision to TS 3.0.4 in that a licensee may change operational modes while relying on an excessive number of TS "Action Statements." By letter dated November 8, 1990, the NRC staff requested that the licensee (1) for each proposed Technical Specification exception to be granted under Generic Letter 87-09, the licensee affirm that remedial measures prescribed for the affected ACTION STATEMENTS are consistent with the Updated Safety Analysis Report and its supporting safety analyses, and (2) identify those administrative controls (e.g., maintenance program provisions, plant operating procedures, management directives, onsite safety review, etc.) that have been established to limit the use of the Specification 3.0.4 exceptions granted.

By letter dated January 10, 1991, the licensee stated that, "...NNECO hereby certifies that for each Technical Specification to which the proposed changes to Specification 3.0.4 will be applied, the ACTION statement for that Technical Specification provides an adequate level of protection for a change

in operational mode or specified condition." In addition, with regard to changing operational modes, the licensee stated that:

"NNECO recognizes the potential aggregate effect of allowing a Mode change with multiple LCO ACTION statements. While the compensatory measures required to cope with any individual equipment not fully operational may be acceptable, the challenge to operators with many required compensatory actions may not be acceptable. One element of NNECO management control has always included careful consideration of overall plant condition prior to authorizing a change in operational mode or a specified condition. NNECO management will continue to carefully consider the equipment not available, both on an individual basis, as well as in aggregate and will authorize a change in operational mode or a specified condition only when it is prudent to do so. This will limit the reliance on Specification 3.0.4 for plant startups to those situations that are both prudent and safe for plant operation.

In addition, the plant operators will be made aware of and will be instructed in exercising the proper controls for limiting the use of such exceptions."

We consider the licensee's January 10, 1991 response to our November 8, 1990 letter to be acceptable.

ENVIRONMENTAL CONSIDERATION

The amendment changes 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 surveillance requirements. We have 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 staff has previously published a proposed finding that the amendment involves no significant hazards consideration and there has been no public comment on such finding. Accordingly, the 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 the amendment.

CONCLUSION

We have 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 (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: G. Vissing

Dated: February 26, 1991