Dominion Nuclear Connecticut, Inc.
Millstone Power Station
Rope Ferry Road
Waterford, CT 06385

Dominion

NOV 8 2001

Docket Nos. 50-245
50-336
50-423
B18415

RE: 10 CFR 50.90

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3
Technical Specification Change Request
Administrative and Editorial Changes to the Unit Nos. 1, 2 and 3
Technical Specifications

Pursuant to 10 CFR 50.90, Dominion Nuclear Connecticut, Inc. (DNC) proposes to amend Operating License Nos. DPR-21, DPR-65 and NPF-49 by incorporating administrative and editorial changes into the Millstone Unit No. 1 Permanently Defueled Technical Specifications (PDTS) and Unit Nos. 2 and 3 Technical Specifications (TS).

Part A of this change proposes to relocate redundant design features information (i.e., information already included in licensing basis (LB) documents), from Section 5.0, "Design Features," of the Unit Nos. 2 and 3 TS, to these other LB documents, consistent with the improved Standard Technical Specifications (STS)[1][2] for the respective unit design. The involved specifications are discussed herein.

Part B of this change proposes several modifications to the Unit Nos. 1, 2 and 3 TS:

- Revise Specification 5.6.2, "Technical Specifications (TS) Bases Control Program," in the Unit No. 1 PDTS, in accordance with TSTF-364[3] to incorporate the 10 CFR 50.59 rule change. Add a new specification, i.e., Specification 6.22 for Unit No. 2 and 6.17 for Unit No. 3, to incorporate a TS bases control program within the Unit Nos. 2 and 3 TS.
- Add a new Specification, i.e., 6.18, "Component Cyclic or Transient Limits," to the Unit No. 3 TS to define the program for tracking cyclic (or transient) limits. These limits are proposed to be relocated from Specification 5.7, "Component Cyclic or Transient Limit," in the Unit No. 3 TS, to the Unit No. 3 Final Safety Analysis Report (FSAR).

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(1) NUREG - 1432, Revision 2, "Standard Technical Specifications - Combustion Engineering Plants," April 2001.

(2) NUREG - 1431, Revision 2, "Standard Technical Specifications - Westinghouse Plants," April 2001.

(3) Technical Specification Task Force (TSTF)-364, "Revision to TS Bases Control Program to Incorporate Changes to 10 CFR 50.59," Approved June 16, 2000.

A001

Rec'd 12/19/01

Part C of this TS change proposes two changes to revise the Unit Nos. 1, 2 and 3 TS related to Radiological Environmental Monitoring Program (REMP) procedure processing to:

- Remove reference to an organization affiliated with Northeast Utilities (NU), the Production Operations Services Laboratory (POSL), which is no longer applicable following the change in ownership from NU to DNC. Replace the reference to the Radiological Assessment Branch with the "organization responsible for the REMP" for review/approval of changes to the REMP to avoid future TS changes due to a change in organizational titles.
- Correct an inconsistency within the Unit No. 1 PDTS which implies that REMP procedures are processed under the general procedure processing specification, i.e., Specification 5.5.1, in addition to the specific specifications for processing REMP procedure changes, i.e., Specifications 5.5.6 and 5.5.7.

Part D of this TS change proposes administrative changes to correct miscellaneous editorial issues and achieve consistency between the TS for each unit. A listing and discussion of each of the proposed changes is provided within this part. Where possible, these changes have been grouped into categories to simplify the discussion. The categories include: 1) changes to and corrections in titles, 2) correct references to the quality assurance program, and 3) change titles to utilize the term radiation protection rather than health physics.

Attachment 1 provides a discussion of the proposed changes and the Safety Summary. Attachment 2 provides the No Significant Hazards Consideration (SHC) discussion. Attachments 3, 4 and 5 provide a marked-up version of the appropriate pages of the current Unit No. 1 PDTS and the Unit Nos. 2 and 3 TS, respectively. Attachments 6, 7 and 8 provide the retyped pages for the Unit No. 1 PDTS and the Unit Nos. 2 and 3 TS.

Environmental Considerations

DNC has evaluated the proposed changes against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.22. DNC has determined that the proposed changes meet the criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and as such, has determined that no irreversible consequences exist in accordance with 10 CFR 50.92(b).

This determination is based on the fact that the changes are being proposed as an amendment to a license issued pursuant to 10 CFR 50 that changes a requirement with respect to use of a facility component located within the restricted area, as defined in 10 CFR 20, or that changes an inspection or surveillance requirement, and that the amendment request meets the following specific criteria.

(i) The proposed changes involve no significant hazards consideration.

As demonstrated in Attachment 2, the proposed changes do not involve a significant hazards consideration.

(ii) There is no significant change in the types or significant increase in the amounts of any effluent that may be released off site.

Part A of this change proposes to relocate selected Unit Nos. 2 and 3 Section 5, "Design Features" specifications, not required to be retained in the TS, to the respective unit's FSAR. Part B proposes to revise the "Technical Specifications (TS) Bases Control Program" specification, and add a "Component Cyclic or Transient Limit" program to the Unit No. 3 TS, consistent with the guidance of the improved STS. Part C proposes to revise specifications related to REMP procedure processing to reflect the change in ownership from Northeast Utilities to DNC, and to correct an inconsistency within the Unit No. 1 PDTS with regards to REMP procedure processing. Part D proposes miscellaneous administrative changes to correct editorial issues and achieve consistency between the TS for each unit. The changes discussed in Parts A through D will not change the types or the amounts of any effluent released off site.

The proposed changes are consistent with and do not change the design basis of the plant. The proposed changes will not result in an increase in power level, will not increase the production of radioactive waste and byproducts, and will not alter the flowpath or method of disposal of radioactive waste or byproducts. Therefore, the proposed changes will not increase the type and amounts of effluents that may be released off site.

(iii) There is no significant increase in individual or cumulative occupational radiation exposure.

The proposed changes will not result in changes in the configuration of the facility. There will be no change in the level of controls or methodology used for processing radioactive effluents or the handling of solid radioactive waste. There will be no change to the normal radiation levels within the plant. Therefore, there will be no increase in individual or cumulative occupational radiation exposure resulting from the proposed changes.

Conclusions

The proposed changes do not impact the public health and safety (see the Safety Assessment provided in Attachment 1) and do not involve a Significant Hazards Consideration pursuant to the provisions of 10 CFR 50.92 (see the SHC provided in Attachment 2).

Site Operations Review Committee and Nuclear Safety Assessment Board

The Site Operations Review Committee and Nuclear Safety Assessment Board have reviewed and concurred with the determinations.

Schedule

We request issuance of this amendment by November 7, 2002, with the amendment to be implemented within 60 days of issuance.

State Notification

In accordance with 10 CFR 50.91(b), a copy of this License Amendment Request is being provided to the State of Connecticut.

There are no regulatory commitments contained in this letter.

If you should have any questions regarding this submittal, please contact Mr. Ravi Joshi at (860) 440-2080.

Very truly yours,

DOMINION NUCLEAR CONNECTICUT, INC.

J. Alan Price, Vice President
Nuclear Technical Services - Millstone

Subscribed and sworn to before me
this 8th day of Oct November, 2001

Notary Public

Date Commission Expires: SANDRA J. ANTON
NOTARY PUBLIC
COMMISSION EXPIRES
MAY 31, 2005

cc: See next page

Attachments:
1) Discussion of the Proposed Changes and the Safety Summary
2) Significant Hazards Consideration
3) Marked-up Unit No. 1 Permanently Defueled Technical Specification Pages
4) Marked-up Unit No. 2 Technical Specification Pages
5) Marked-up Unit No. 3 Technical Specification Pages
6) Retyped Unit No. 1 Permanently Defueled Technical Specification Pages
7) Retyped Unit No. 2 Technical Specification Pages
8) Retyped Unit No. 3 Technical Specification Pages

cc: H. J. Miller, Region I Administrator
J. B. Hickman, NRC Project Manager, Millstone Unit No. 1
T. J. Jackson, NRC Inspector, Region I, Millstone Unit No. 1
J. T. Harrison, NRC Project Manager, Millstone Unit No. 2
NRC Senior Resident Inspector, Millstone Unit No. 2
V. Nerses, NRC Senior Project Manager, Millstone Unit No. 3
NRC Senior Resident Inspector, Millstone Unit No. 3

Director
Bureau of Air Management
Monitoring and Radiation Division
Department of Environmental Protection
79 Elm Street
Hartford, CT 06106-5127

Docket Nos. 50-245
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Attachment 1

Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3

Technical Specification Change Request
Administrative and Editorial Changes to the Unit Nos. 1, 2 and 3
Technical Specifications
Discussion of the Proposed Changes and the Safety Summary

**Technical Specification Change Request**
**Administrative and Editorial Changes To The Unit Nos. 1, 2 and 3**
**Technical Specifications**
**Discussion of the Proposed Changes and the Safety Summary**

## INTRODUCTION

Pursuant to 10 CFR 50.90, Dominion Nuclear Connecticut, Inc. (DNC) proposes to amend Operating License Nos. DPR-21, DPR-65 and NPF-49 by incorporating administrative and editorial changes into the Millstone Unit No. 1 Permanently Defueled Technical Specifications (PDTS) and Unit Nos. 2 and 3 Technical Specifications (TS).

Part A of this TS change proposes to relocate redundant design features information (i.e., information already included in other licensing basis (LB) documents, e.g., the Final Safety Analysis Report), from Section 5.0, "Design Features," of the Unit Nos. 2 and 3 TS, to other LB documents, consistent with the improved Standard Technical Specifications (STS)[1][2] for the respective unit design.

Part B of this change proposes several modifications to the Unit Nos. 1, 2 and 3 TS:

- Revise Specification 5.6.2, "Technical Specifications (TS) Bases Control Program," in the Unit No. 1 PDTS, in accordance with TSTF-364[3] to incorporate the 10 CFR 50.59 rule change. Add a new specification, i.e., Specification 6.22 for Unit No. 2 and 6.17 for Unit No. 3, to incorporate a TS bases control program within the Unit Nos. 2 and 3 TS.

- Add a new Specification, i.e., 6.18, "Component Cyclic or Transient Limits," to the Unit No. 3 TS to define the program for tracking cyclic (or transient) limits. These limits are currently listed in Specification 5.7, "Component Cyclic or Transient Limit," in the Unit No. 3 TS, but will be relocated to applicable sections of the Millstone Unit No. 3 Final Safety Analysis Report (FSAR).

Part C of this TS change proposes two changes to revise the Unit No. 1 PDTS and the Unit Nos. 2 and 3 TS related to Radiological Environmental Monitoring Program (REMP) procedure processing to:

- Remove the reference to an organization affiliated with Northeast Utilities (NU), the Production Operations Services Laboratory (POSL), which is no longer applicable following the change in ownership from NU to DNC. Replace the reference to the

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(1) NUREG - 1432, Revision 2, "Standard Technical Specifications - Combustion Engineering Plants," April 2001.

(2) NUREG - 1431, Revision 2, "Standard Technical Specifications - Westinghouse Plants," April 2001.

(3) Technical Specification Task Force (TSTF)-364, "Revision to TS Bases Control Program to Incorporate Changes to 10 CFR 50.59," Approved June 16, 2000.

Radiological Assessment Branch with the "organization responsible for the REMP" for review/approval of changes to the REMP to avoid future TS changes due to a change in organizational titles. This is consistent with the guidance of Generic Letter (GL) 88-06.[4]

- Correct an inconsistency within the Unit No. 1 PDTS which implies that REMP procedures are processed under the general procedure processing specification, i.e., Specification 5.5.1, in addition to the specific specifications for processing REMP procedure changes, i.e., Specifications 5.5.6 and 5.5.7.

Part D of this TS change proposes changes to correct miscellaneous editorial issues and achieve consistency between the TS for each unit. A listing and discussion of each of the proposed changes is provided within this part. Where possible these changes have been grouped into categories to simplify the discussion. The categories include: 1) changes to and/or corrections in titles, 2) correct references to the quality assurance program, and 3) change titles to utilize the term radiation protection rather than health physics.

## DISCUSSION OF THE PROPOSED CHANGES TO THE UNIT NO. 1 PDTS AND THE UNIT NOS. 2 AND 3 TECHNICAL SPECIFICATIONS

The information within the specifications discussed below is proposed to be either relocated from the respective units TS to the appropriate FSAR, or be revised to reflect the content and/or the format of information within the improved STS, or be revised to incorporate editorial corrections or reflect administrative changes within the TS.

Attachments 3, 4 and 5 provide the marked-up current version of the appropriate pages of the Unit No. 1 PDTS and the Unit Nos. 2 and 3 TS, respectively. Attachments 6, 7 and 8 provide the retyped pages for the Unit No. 1 PDTS and the Unit Nos. 2 and 3 TS.

### A. RELOCATION OF INFORMATION FROM THE UNIT NOS. 2 AND 3 TS TO OTHER LICENSING BASIS DOCUMENTS

Section 182a of the Atomic Energy Act requires applicants for nuclear power plant operating licenses to develop TS, which are included as a part of the operating license (OL). 10 CFR 50.36 sets forth the content of the TS. This regulation requires the TS to include items in five specific categories, among those, limiting conditions for operation (LCOs), design features and administrative controls. 10 CFR 50.36 does not specify the particular specifications to be included as part of a

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(4) U.S. Nuclear Regulatory Commission, Generic Letter 88-06, "Removal of Organization Charts From Technical Specification Administrative Control Requirements," dated March 22, 1988.

plant's OL. A May 9, 1988, letter[5] described results of an NRC staff review to determine which LCOs should be included in the TS. This ultimately resulted in four criteria being developed, as described in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors,"[6] later codified in 10 CFR 50.36(c)(2)(ii). With respect to which design features should be included in the TS, 10 CFR 50.36(c)(4) provides guidance as to which design features should be included. It states, "Design features to be included are those features of the facility such as materials of construction and geometric arrangements, which, if altered or modified, would have a significant effect on safety and are not covered in categories described in paragraphs (c) (1), (2) and (3) of this section."

DNC proposes to revise the specifications, listed below, in Section 5.0, "Design Features" of the Unit Nos. 2 and 3 TS to reflect the improved STS[1][2] for the respective unit. Prior to development of the improved STS, there was little guidance or standardization as to what design features should be included in the TS. Evaluation during improved STS development identified the features required to be retained in the TS and those that could be relocated to other LB documents, e.g., the FSAR. Design information, e.g., specifications and figures, not included within the improved STS for the respective unit design, does not meet the criteria of 10 CFR 50.36(c)(4) for inclusion as design features and may be relocated from the TS to other licensee-controlled documents. The items/information proposed for relocation are provided or described within the respective unit's FSAR, which will ensure that any future changes are evaluated under the 10 CFR 50.59 process.

| Specification | Title | Unit 2 | Unit 3 |
|---|---|---|---|
| 5.1 | Site | M | M |
| 5.1.1 | Exclusion Area | X | X |
| 5.1.2 | Low Population Zone | X | X |
| 5.1.3 | Site Boundary For Liquid And Gaseous Effluents | - | X |
| 5.1.3 | Flood Control | X | - |
| 5.2 | Containment | X | X |
| 5.2.1 | Configuration | X | X |
| 5.2.2 | Design Pressure And Temperature | X | X |
| 5.2.3 | Penetrations | X | - |

(5) Thomas E. Murley, Director, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission, letter to Walter S. Wilgus, Chairman, The B&W Owners Group, "NRC Staff Review of Nuclear Steam Supply System Vendor Owners Groups' Application of the Commission's Interim Policy Statement Criteria to Standard Technical Specifications," dated May 9, 1988.

(6) U.S. Nuclear Regulatory Commission, "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (Final Policy Statement), 58 FR 39132, dated July 22, 1993.

| Specification | Title | Unit 2 | Unit 3 |
|---|---|---|---|
| 5.4 | Reactor Coolant System | X | X |
| 5.4.1 | Design Pressure And Temperature | X | X |
| 5.4.2 | Volume | X | X |
| 5.5 | Emergency Core Cooling Systems | X | - |
| 5.7 | Seismic Classification | X | - |
| 5.8 (Unit 2)<br>5.5 (Unit 3) | Meteorological Tower Location | X | X |

Note: The Unit Nos. 2 and 3 specifications, indicated with an "X" above, involve design features information to be relocated to the respective FSAR. Specifications marked with an "M" are proposed to be modified.

1. Unit Nos. 2 and 3 - TS 5.1, "SITE"

Rename Unit Nos. 2 and 3 Specification 5.1, "Site," as "Site Location." Also, in the respective Index page change the title of Specification 5.1 from "Site" to "Site Location."

Specification 5.1, "Site Location," is being revised to provide a textual description of the Millstone site location for each of the two unit's consistent with the improved STS format. The textual description (see Insert) specifies for the respective unit: the description of the unit's location onsite, the minimum distance, on land, to the site boundary for the unit (minimum distance to Exclusion Area Boundary (EAB)), and also specifies that no part of the site closer to the unit's release point than the minimum distance, on land, to the EAB for that unit shall be sold or leased, except to DNC or its corporate affiliates.

a. Unit Nos. 2 and 3 - TS 5.1.1, "EXCLUSION AREA"

Delete Specification 5.1.1 and corresponding Figure 5.1-1, both named "Exclusion Area," and replace them with Specification 5.1, "Site Location." Unit No. 3 FSAR Section 2.1.1.3, "Boundaries for Establishing Effluent Release Limits," discusses the EAB for the site. Since each unit has several radioactive effluent release points, Unit No. 2 FSAR Table 2.3-1 provides the distances (for each sector) for Unit 2 and Unit No. 3 FSAR Table 2.3-34 provides the distances (for each sector) for Unit No. 3 for the distance from each release point to the EAB. Unit Nos. 2 and 3 FSAR Sections 2.3.4, "Short-Term (Accident) Diffusion Estimates," describes the application of the methodology. Unit No. 2 TS Figure 5.1-1 is equivalent to, and Unit No. 3 TS Figure 5.1-1 corresponds to, Unit No. 3 FSAR Figure 2.1-3. The Unit No. 2 FSAR, Section 2.1, "General Description," references the Unit No. 3 FSAR Figure 2.1-3 for the EAB over land and describes in words the EAB over water for the different release points.

The guidance of NUREG-1431 and 1432 recommends inclusion of a text-only description of the site location. The NRC Staff has previously found it acceptable[7] to remove figures describing the EAB provided that the text description contains adequate information pertaining to the site boundary and location. The description of the site location provided in Specification 5.1 contains equivalent information to that provided in TS Figure 5.1-1. In accordance with 10 CFR 100, the site description includes a minimum distance to the EAB to ensure that the area, for which the licensee has the authority to determine all activities including the exclusion or removal of personnel and property from the area, is clearly associated with the "place of use" referred to in Section 182.a of the Atomic Energy Act. The inclusion of this map in the Unit No. 3 FSAR, which is referenced by the other Millstone unit's, will ensure that any change to either the boundary or the zone will have to be evaluated under the 10 CFR 50.59 process.

b. Unit Nos. 2 and 3 - TS 5.1.2, "LOW POPULATION ZONE

Delete Specification 5.1.2 and corresponding Figure 5.1-2, both named "Low Population Zone" (LPZ) and replace them with Specification 5.1, "Site Location." Unit Nos. 2 and 3 TS Figures 5.1-2 contain information corresponding to a textual description of the LPZ included in Section 2.1.3.4, "Low Population Zone," of the Unit No. 3 FSAR which is referenced by Section 2.1, "General Description," of the Unit No. 2 FSAR.

Figure 5.1-2 depicts the LPZ as a circle centered on the respective reactor having a 3860 meter (approximately 2.4 statute mile) radius. Removal of Specification 5.1.2 and associated Figure 5.1-2 is acceptable as this information does not meet any of the inclusion criteria for information required to be contained in the TS pursuant to 10 CFR 50.36(c)(4). The NRC has previously found it acceptable to remove figures describing the LPZ from the TS.(7) This proposed change is consistent with the guidance provided in the appropriate improved STS NUREG, i.e., NUREG-1432 for Unit No. 2 and NUREG-1431 for Unit No. 3, which do not include an LPZ specification. A description of the LPZ is included in Section 2.1.3.4 of the Unit No. 3 FSAR which is referenced by Section 2.1 of the Unit No. 2 FSAR. The existence of this discussion within the Unit No. 3 FSAR (which is referenced by the Unit No. 2 FSAR) will ensure that any change to the LPZ will be evaluated under the 10 CFR 50.59 process.

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(7) C. Nolan, U.S. Nuclear Regulatory Commission, to C. Randy Hutchinson, Arkansas Nuclear One, Unit No. 2, "Issuance of Amendment RE: Design Features And Administrative Controls," (TAC No. MA2403), dated May 19, 1999.

c. Unit No. 3 - TS 5.1.3, "SITE BOUNDARY FOR LIQUID AND GASEOUS EFFLUENTS" --- [Unit 3 only]

Delete Specification 5.1.3 and corresponding Figure 5.1-3, both named "Site Boundary for Liquid and Gaseous Effluents," and replace them with Specification 5.1, "Site Location." Unit No. 3 TS Figure 5.1-3 corresponds to Unit No. 3 FSAR Figure 2.1-3.

Unit No. 3 TS Figure 5.1-3 depicts the site boundary for liquid and gaseous effluents. Removal of Specification 5.1.3 and associated Figure 5.1-3 is acceptable as this information does not meet any of the inclusion criteria for information contained in TS pursuant to 10 CFR 50.36(c)(4). The NRC has previously found it acceptable to remove figures describing the EAB and LPZ from the TS and removing the figure describing the site boundary for liquid and gaseous effluents is similar in concept. This proposed change is consistent with the guidance provided in the improved STS NUREG-1431[(2)] which does not include a specification for the site boundary for liquid and gaseous effluents. A description of the site boundary for liquid and gaseous effluents is included in Section 2.1.1.3, "Boundaries for Establishing Effluent Release Limits," of the Unit No. 3 FSAR. The existence of this discussion and the associated figure within the Unit No. 3 FSAR will ensure that any change to the site boundary for liquid and gaseous effluents will be evaluated under the 10 CFR 50.59 process.

2. Unit No. 2 - TS 5.1.3, "FLOOD CONTROL" --- [Unit 2 only]

Delete Specification 5.1.3, "Flood Control." This specification indicates that the design and maintenance of flood control provisions is in accordance with the description contained in Section 2.5.4.2, "Tides and Flooding Due to Storms," of the Unit No. 2 FSAR. This statement does not provide a design feature required to be retained in the TS, rather it provides a reference to where flood control related design provisions are contained in the FSAR. Future changes to flood control design requirements will continue to be evaluated under the 10 CFR 50.59 process, since the flood control information remains within the Unit No. 2 FSAR.

This specification does not meet the criteria of 10 CFR 50.36(c)(4) for inclusion as a design feature within the TS. Removal of this specification is also consistent with the guidance provided in NUREG-1432, which does not include this specification.

3. Unit Nos. 2 and 3 - TS 5.2, "CONTAINMENT"

Delete Specification 5.2, "Containment," and Sub-specifications 5.2.1, "Configuration," and 5.2.2, "Design Pressure And Temperature," from the Unit

Nos. 2 and 3 TS. Delete Specification 5.2.3, "Penetration" from the Unit No. 2 TS. The design features, i.e., parameters or design information referred to within these specifications, are duplicated within the respective unit's FSAR.

a. Unit Nos. 2 and 3 - TS 5.2.1, "CONFIGURATION"

Delete Specification 5.2.1, "Configuration." It specifies the following containment design features: shape, materials of construction, nominal inside diameter, nominal inside height, minimum thickness of concrete walls, minimum thickness of concrete dome (or roof), minimum thickness of concrete floor pad, nominal thickness of steel liner and net free volume.

b. Unit Nos. 2 and 3 - TS 5.2.2, "DESIGN PRESSURE AND TEMPERATURE"

Delete Specification 5.2.2, "Design Pressure and Temperature." It specifies that the containment building structure is designed for a maximum internal pressure, a minimum internal pressure (Unit No. 3 only) and a maximum temperature value.

Table 1 of this attachment, "Configuration, and Design Pressure and Temperature," references FSAR sections containing the same containment design requirements. Specifications relating to Containment design parameters essential to be retained within the TS (i.e., as LCO's) are included within Section 3/4.6, "Containment Systems" of the respective Unit Nos. 2 or 3 TS.

The specifications and figures describing the Containment, Configuration and Design Pressure and Temperature, do not meet the criteria of 10 CFR 50.36(c)(4) for items to be included within the TS. Elimination of this information from the Design Features section has been previously approved by the NRC Staff on that basis.(7)

This proposed change is consistent with the guidance provided in the appropriate improved STS NUREG, i.e., NUREG-1432 for Unit No. 2 and NUREG-1431 for Unit No. 3 which does not include containment configuration specifications in the Design Features section of the improved STS. A description of the information contained in Specifications 5.2.1 and 5.2.2, which is proposed to be eliminated by this change, is presently in the respective unit's FSAR with the exception of the equilibrium containment liner temperature for Unit No. 2, for which a value exactly matching the TS was not provided. This information will be added to the FSAR in conjunction with the processing of this amendment. Modifications or alterations to these design features as described in the respective FSAR will be evaluated under the 10

CFR 50.59 process. Removing these specifications and figures is consistent with the improved STS guidance and format (see NUREG-1431 and 1432).

c. Unit No. 2 - TS 5.2.3, "PENETRATIONS" --- [Unit 2 only]

Delete Specification 5.2.3, which indicates that the design and maintenance of the reactor containment building penetrations is in accordance with the design provisions contained in Section 5.2.8, "Containment Isolation System," in the Unit No. 2 FSAR. This specification does not provide a design feature required to be retained in the TS, rather it provides a reference to where information on the design and maintenance of reactor containment building penetrations is contained in the FSAR. Future changes to this information will continue to be evaluated under the 10 CFR 50.59 process, since information on the design of the reactor containment building penetrations remains within the Unit No. 2 FSAR.

This specification does not meet the criteria of 10 CFR 50.36(c)(4) for inclusion as a design feature within the TS. Removal of this specification is also consistent with the guidance provided in NUREG-1432, which does not include this specification.

4. Unit Nos. 2 and 3 - TS 5.4, "REACTOR COOLANT SYSTEM"

Delete Specification 5.4 and sub-specifications 5.4.1, "Design Pressure And Temperature," and 5.4.2, "Volume," which provides design pressure, temperature and volume parameters for the reactor coolant system (RCS). The information in TS 5.4 is contained in the various sections of the FSAR.

These specifications within the Unit Nos. 2 and 3 TS can be deleted because other areas of the TS adequately control RCS parameters, such as pressure, temperature, and pressure boundary degradation, which could have a significant impact on safety. Specifications in Section 3/4.4, "Reactor Coolant System," provide effective operational limits to ensure RCS temperature, pressure and leakage is maintained below the respective design limit and monitor RCS degradation. Specifications 5.4.1 and 5.4.2 can be eliminated from the TS as this information does not satisfy any of the inclusion criteria specified in 10 CFR 50.36(c)(4). Elimination of Specification 5.4.1[7] and Specification 5.4.2[8] related information from the Design Features section has been previously approved by the NRC Staff on this basis. Any modifications to the RCS related design-basis information contained in the respective FSAR will be evaluated under the 10 CFR 50.59 process and

(8) G. Kalman, U.S. Nuclear Regulatory Commission, to C. Randy Hutchinson, Arkansas Nuclear One, Unit No. 2, "Issuance of Amendment 181 to Facility Operating License No. NPF-6 - Arkansas Nuclear One, Unit No. 2," (TAC No. M97534), dated April 16, 1997.

therefore, proposed changes will be controlled. The deletion of the RCS related design features information from TS and maintenance of the information in the respective FSAR is consistent with NUREG- 1431 or 1432.

5. Unit No. 2 - TS 5.5, "EMERGENCY CORE COOLING SYSTEMS" --- [Unit 2 only]

Delete Specification 5.5, which indicates that the design and maintenance of the emergency core cooling systems (ECCS) is in accordance with the design provisions contained in Section 6.3, "Safety Injection System," within the Unit No. 2 FSAR. This specification does not provide a design feature required to be retained in the TS, rather it provides a reference to where ECCS design provisions are contained in the FSAR. Future changes to ECCS design requirements will continue to be evaluated under the 10 CFR 50.59 process, since this information remains within the Unit No. 2 FSAR.

This specification does not meet the criteria of 10 CFR 50.36(c)(4) for inclusion as a design feature within the TS. Removal of this specification is also consistent with the guidance provided in NUREG-1432, which does not include this specification.

6. Unit No. 2 - TS 5.7, "SEISMIC CLASSIFICATION" --- [Unit 2 only]

Delete Specification 5.7, which indicates that the systems, structures and components (SSC) identified as Category I Items within Section 5.1.1, "Classes of Structures," within the Unit No. 2 FSAR shall be designed and maintained in accordance with the design provisions contained in Section 5.8, "Seismic Design," within the FSAR. This specification does not provide a design feature required to be retained in the TS, rather it provides a reference to where seismic Category I design provisions are contained in the FSAR. Future changes to seismic Category I design requirements will continue to be evaluated under the 10 CFR 50.59 process, since this information remains within the Unit No. 2 FSAR.

This specification does not meet the criteria of 10 CFR 50.36(c)(4) for inclusion as a design feature within the TS. Removal of this specification is also consistent with the guidance provided in NUREG-1432, which does not include this specification.

7. Unit No. 2 - TS 5.8, and Unit No. 3 - TS 5.5, "METEOROLOGICAL TOWER LOCATION"

Delete Unit No. 2 Specification 5.8 and Unit No. 3 Specification 5.5, "Meteorological Tower Location," from the respective TS. Also, the following figures which show the meteorological tower location, i.e., Figure 5.1-1, "Exclusion Area," for Unit No. 2 and Figure 5.1-3, "Site Boundary For Liquid And Gaseous Effluents," for Unit No. 3 are proposed to be removed. These

specifications do not provide a design feature required to be retained in the TS, rather they provide a reference to where the meteorological tower is located, that information will continue to be available in the FSAR. Future changes to meteorological tower design requirements will continue to be evaluated under the 10 CFR 50.59 process, since this information remains within the Unit Nos. 2 and 3 FSAR.

These specifications do not meet the criteria of 10 CFR 50.36(c)(4) for inclusion as a design feature within the TS. Elimination of this information from the Design Features section has been previously approved by the NRC Staff on that basis.(7) Removal of these specifications is also consistent with the guidance provided in NUREG-1431 and 1432, which do not include this specification.

## B. SPECIFICATIONS BEING REVISED OR ADDED TO REFLECT THE GUIDANCE OF THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS

The improved STS provide the benefit of cross industry and NRC experience and knowledge resulting in better, more refined, TS. Several specifications are being revised to reflect the improved STS guidance. DNC proposes to revise for Unit No. 1, and add for Unit Nos. 2 and 3, a TS Bases Control Program. Additionally, DNC proposes to add a Component Cyclic or Transient Limit Specification to the Unit No. 3 TS. These proposed changes are discussed below.

1. Unit No. 1 - PDTS 5.6.2, and Unit Nos. 2 and 3 New Specification, "TECHNICAL SPECIFICATION (TS) BASES CONTROL PROGRAM"

The Technical Specification (TS) Bases Control Program described in each of the improved STS NUREGs allowed licensees to make changes to the TS Bases without NRC approval provided the change did not involve a change to the updated FSAR or Bases, or involved an unreviewed safety question (USQ) as defined in 10 CFR 50.59. In 1999, the NRC revised 10 CFR 50.59[9] which controls the conduct of changes, tests and experiments performed by nuclear plant licensees. This revision to 10 CFR 50.59 eliminated the definition of USQ. This necessitates that the Unit No. 1 PDTS, which contain a "Technical Specifications (TS) Bases Control Program," specification, i.e., Specification 5.6.2 be revised to be consistent with this revision to 10 CFR 50.59.

Therefore, it is proposed to revise Unit No. 1 PDTS Specification 5.6.2 in accordance with the guidance of TSTF-364(3) to incorporate the necessary changes due to the 10 CFR 50.59 rule change. At present, changes to the Millstone Unit Nos. 2 and 3 Technical Specifications basis sections are

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(9) Code of Federal Regulations 10 CFR 50.59, Federal Register - Volume 64, Number 191, dated October 4, 1999.

controlled in accordance with plant procedures. A 10 CFR 50.59 review is performed to determine if the bases only change requires NRC approval. If a change does not require NRC approval, it is implemented and then submitted to the NRC for information. DNC proposes to also add a TS Bases Control Program within the Unit Nos. 2 and 3 TS, consistent with the improved STS. The TS based control specification would be Specification 6.22 for Unit No. 2 and 6.17 for Unit No. 3.

Revise Unit No. 1 PDTS Specification 5.6.2.b

Unit No. 1 PDTS Specification 5.6.2.b currently states: "Licensees may make changes to Bases without prior NRC approval provided the changes do not involve either of the following: 1. a change in the TS incorporated in the license; or 2. a change to the updated FSAR or Bases that involves an unreviewed safety question as defined in 10 CFR 50.59."

It is proposed to revise Unit No. 1 PDTS Specification 5.6.2.b to state: "Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:" Capitalize the first word in the phrase of Specification 5.6.2.b.1. Revise Specification 5.6.2.b.2 to state: "A change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59."

Add a "Technical Specifications (TS) Bases Control Program" to the Unit Nos. 2 and 3 TS

Add a new specification (i.e., Specification 6.22 for Unit No. 2 and 6.17 for Unit No. 3) entitled "Technical Specifications (TS) Bases Control Program" to the Unit Nos. 2 and 3 TS. This approach to TS Bases control is consistent with the improved STS as described in NUREG-1432 and 1431 (which includes TSTF-364).

2. Unit No. 3 - Add a "Component Cyclic or Transient Limit Specification"

The "Component Cyclic or Transient Limit Specification," defined in each of the improved STS NUREGs allows licensees to track cyclic and transient occurrences as described in the FSAR. Currently, these limits are listed in Specification 5.7, "Component Cyclic or Transient Limit," in the Unit No. 3 TS in addition to the FSAR. DNC proposes to add a new Specification, i.e., 6.18, "Component Cyclic or Transient Limits," to the Unit No. 3 TS to define the program for tracking cyclic (or transient) limits. The limits located in Specification 5.7 would be relocated to the Unit No. 3 FSAR and the specification deleted. The information contained within Specification 5.7 does not meet the criteria of 10 CFR 50.36(c)(4) for items to be included within the TS. Elimination of this information from the Design Features section has been previously approved by the NRC Staff on that basis.[7] This

approach to cyclic limit control is consistent with the improved STS as described in NUREG-1431.

## C. REMP SPECIFICATION MODIFICATIONS TO REFLECT CHANGE IN OWNERSHIP FROM NORTHEAST UTILITIES TO DNC AND TO CORRECT AN INCONSISTENCY WITHIN THE UNIT No. 1 PDTS FOR REMP PROCEDURE PROCESSING

Part C of this proposed TS change revises the Unit Nos. 1, 2 and 3 TS related to REMP procedure processing to reflect the modifications necessary due to the change in ownership from Northeast Utilities to DNC, and to correct an inconsistency within the Unit No. 1 PDTS with regards to REMP procedure processing.

1. Revise The Unit Nos. 1, 2 and 3 TS Describing REMP Program Procedure Processing To Reflect The Current Responsible Organization

The current Unit Nos. 1, 2 and 3 TS provide a separate review and approval process for REMP procedures. All procedures, procedure changes, and temporary changes to the REMP are required to be reviewed by an individual (other than the author) from either the Radiological Assessment Branch or the Production Operation Services Laboratory (POSL). These controls are described in the respective specifications, i.e., Specifications 5.5.6 and 5.5.7 for Unit No. 1, 6.8.5 for Unit No. 2, and 6.8.6 for Unit No. 3. With the sale of the Millstone units to DNC,[10] the Millstone Nuclear Power Station no longer has any connection with Northeast Utilities, and therefore does not utilize the services of the POSL. Therefore, it is proposed to remove the term "Production Operation Services Laboratory or POSL" where it appears within the specifications.

Also, the reference to the outdated term "Radiological Assessment Branch" is proposed to be replaced with a generic term. Instead of referring to a specific title, i.e., the "Radiological Assessment Branch" the specifications would be revised to refer to a functional title, the "organization responsible for the REMP." The current title of the "organization responsible for the REMP" would be specified in the DNC Quality Assurance Program (QAP) Topical Report. The DNC QAP Topical Report will provide the link between the functional title the "organization responsible for the REMP" specified within the TS and the current organization title.

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(10) Daniel S. Collins, U. S. Nuclear Regulatory Commission to R. G. Lizotte, Northeast Nuclear Energy Company, "Millstone Nuclear Power Station, Unit Nos. 1, 2, and 3 - Issuance of Conforming Amendments (TAC Nos. MA9876, MA9877, and MA9899)," dated March 31, 2001.

This change will reduce/eliminate future TS changes due to changes in the organization responsible for the REMP. Other position and organization titles within Section 6 of the TS for Unit Nos. 2 and 3 (Section 5 for Unit No. 1) have been previously specified in this manner. This change is consistent with the guidance of GL 88-06(4) concerning changes in organizational and position titles.

Therefore, in Specification 5.5.6 (Specifications 6.8.5, paragraph one, for Unit No. 2 and 6.8.5, paragraph one, for Unit No. 3), it is proposed to insert "(REMP)" after the phrase "Radiological Environmental Monitoring Program." Also, the phrase "Radiological Assessment Branch or the Production Operation Services Laboratory (POSL)" would be replaced by the phrase "organization responsible for the REMP." In Specification 5.5.7 (Specifications 6.8.5, paragraph two, for Unit No. 2 and 6.8.6, paragraph two, for Unit No. 3), the phrase "Radiological Assessment Branch or the POSL" would also be replaced by the phrase "organization responsible for the REMP."

2. Revise Unit No. 1 PDTS Specification 5.5.1 To Clarify That REMP Procedures Are Controlled And Processed Under Specifications 5.5.6 and 5.5.7

The Unit Nos. 1, 2 and 3 TS provide a separate review and approval process for REMP procedures, apart from that for general station procedures. Common REMP procedures have been developed for the site. In the Unit No. 1 PDTS, REMP procedures are reviewed, controlled and processed under Specifications 5.5.6 and 5.5.7. However, the wording of some items related to the REMP program listed under Specification 5.5.1 were modified during development of the PDTS (as compared to the Unit Nos. 2 and 3 TS). This resulted in the loss of a clarification that directs one to the administrative specifications associated with the REMP program (i.e., Specifications 5.5.6 and 5.5.7) for processing REMP procedure changes. Also, the reference to "Specification 5.5" in Specification 5.5.3 is not precise, and implies that all procedures, including the REMP procedures, are processed under Specification 5.5.3. This reference should be changed to "Specification 5.5.1" for consistency with Specification 5.5.4 and the corresponding specifications in the Unit Nos. 2 and 3 TS. The result is that the Unit No. 1 PDTS implies that REMP procedures are (or, may also be) reviewed, and approved under the general procedural specifications, i.e., 5.5.1 through 5.5.5, utilized for processing non-REMP related procedures.

An additional problem is that the wording of Specification 5.5.1.d was modified during PDTS development to be similar to the improved STS wording. This has changed this specification from being applicable to just the "quality controls for effluent monitoring," to include "quality assurance for radiological effluent and *environmental monitoring*." [emphasis added]

Without a corresponding clarification, as previously discussed, this specification now also implies that the REMP procedures are processed under the general procedural specifications, i.e., 5.5.1 through 5.5.5, rather than utilizing the alternate REMP related Specifications 5.5.6 and 5.5.7.

For these reasons it is proposed to return the wording of Specification 5.5.1.d to the same exact wording currently within the Unit Nos. 2 and 3 TS, correct the reference to "Specification 5.5" in Specification 5.5.3, and add an exception statement to Specification 5.5.1.g consistent with the Unit Nos. 2 and 3 TS. This will clarify that REMP procedures are reviewed, controlled and processed solely in accordance with Specifications 5.5.6 and 5.5.7.

Therefore, it is proposed to modify Specification 5.5.1.d by deleting the phrase "Quality assurance for radiological effluent and environmental monitoring;" and replacing it with the phrase "Quality Controls for effluent monitoring, using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974;" which was the former wording. Also, it is proposed to revise Specification 5.5.1.g by adding the phrase "except for Section I.E., Radiological Environmental Monitoring of the REMODCM," which is addressed under Specifications 5.5.6 and 5.5.7." Additionally, it is proposed to replace in Specification 5.5.3 the words "Specification 5.5" with "Specification 5.5.1" for consistency with the Unit Nos. 2 and 3 TS.

## D. MISCELLANEOUS ADMINISTRATIVE AND EDITORIAL CHANGES TO THE UNIT NOS. 1, 2 AND 3 TECHNICAL SPECIFICATIONS

This section proposes administrative changes to correct miscellaneous editorial issues and achieve consistency between the TS for each unit. A listing and discussion of each of the proposed changes is provided. Where possible the changes have been grouped into categories to simplify discussion. The categories include: 1) changes to and corrections in titles, 2) correct references to the quality assurance program, and 3) change titles to utilize the term radiation protection rather than health physics.

1. Changes To And Corrections In Titles

| | | Affected Unit TS | | |
|---|---|---|---|---|
| | Description of the Change | Unit 1PDTS | Unit 2 TS | Unit 3 TS |
| a. | Change "Designated Officer" to "designated officer" and "Designated Senior Officer" to "designated senior officer." | 5.1.1, 5.2.1.c, 5.5.2, 5.5.3, 5.5.4, 5.5.5.c | ---- | ---- |
| b. | Change "Designated Manager" to "designated manager." | 5.1.1, 5.2.1.b, 5.5.2, 5.5.3, 5.5.4, 5.5.5.c | ---- | ---- |

| | Description of the Change | Affected Unit TS: Unit 1PDTS | Unit 2 TS | Unit 3 TS |
|---|---|---|---|---|
| c. | Change "Manager" or "Directors" to "managers" or "directors" - functional rather than specific titles. | ---- | 6.8.2.b | 6.8.2.b |
| d. | Change "SS" to "SM" and "Shift Supervisor" to "Shift Manager." (See mark-up.) | ---- | 6.12.2 | Table 6.2-1 and para. after Table, 6.2.4.1, 6.12.2 |
| e. | Change "Operations Manager" and "Assistant Operations Manager" to "operations manager" and "assistant operations manager" for consistency with industry practice for improved TS. | 5.3.1.1 | 6.3.1.a | 6.3.1.a |

This proposed editorial change corrects an inconsistency in capitalization that confuses functional and specific titles. Also, a specific title "Shift Supervisor" has been changed to reflect the current specific title of "Shift Manager." Correction of these inconsistencies allows for common nomenclature between units. Other position and organization titles within Section 6 of the TS for Unit Nos. 2 and 3 (Section 5 for Unit No. 1) have been previously specified in this manner. The current titles are specified in the DNC QAP Topical Report, which provides the link between the functional and specific titles. This change is consistent with the guidance of GL 88-06(4) concerning changes in organizational and position titles.

2. Correct References to the Quality Assurance Program

| | Description of the Change | Affected Unit TS: Unit 1 PDTS | Unit 2 TS | Unit 3 TS |
|---|---|---|---|---|
| a. | Change title of the "Quality Assurance Topical Report" to the "Quality Assurance Program Topical Report" to be consistent with the current title. | 5.1.3, 5.2.1.a | 6.1.3, 6.2.1.a | 6.1.3, 6.2.1.a |

This proposed editorial change corrects an inconsistency in the title for the DNC Quality Assurance Program Topical Report across the unit TS. Correction of this inconsistency allows for common nomenclature between units.

3. Change Title References from Referring to "Health Physics" to "Radiation Protection"

| | Description of the Change | Affected Unit TS: Unit 1 PDTS | Unit 2 TS | Unit 3 TS |
|---|---|---|---|---|
| a. | Change phrase "A Health Physics Technician" to "radiation protection technician." | ---- | 6.2.2.d, Table 6.2-1 Note (2), 6.12.1 | 6.2.2.d, Footnote * to Spec. 6.2.2.d, 6.12.1 |
| b. | Change "health physics" or "Health Physics" to "radiation protection" to be consistent with current industry practice. | 5.8.1, 5.8.2 | 6.2.1.d, 6.12.2 | 6.2.1.d, 6.12.2. |
| c. | Change "Health Physics Manager" to "radiation protection manager." | 5.3.1.2 | 6.3.1.c, 6.12.1.c | 6.3.1.b, 6.12.1.c |
| d. | Add date of Regulatory Guide 1.8, "May 1977" after the words "Revision 1." | 5.3.1.2 | 6.3.1.c | ---- |

This proposed editorial change revises the TS to reflect current industry practice for referring to the radiation protection function. Also, a specific title "Health Physics Manager" has been changed to reflect a functional title of "radiation protection manager." Additionally, the specific title "Health Physics Technician" has been changed to reflect a functional description of "an individual qualified in radiation protection procedures" consistent with the guidance of the improved STS. Correction of these inconsistencies also allows for common nomenclature between units. Other position and organization titles within Section 6 of the TS for Unit Nos. 2 and 3 (Section 5 for Unit No. 1) have been previously specified in a similar manner. The current titles are specified in the DNC QAP Topical Report, which provides the link between the functional and specific titles. This change is consistent with the guidance of GL 88-06 concerning changes in organizational and position titles. As a separate change, the date is added to the reference to RG 1.8 in the Unit Nos. 1 and 2 TS, regarding the qualifications of the radiation protection manager for consistency between units.

4. Remove Outdated Reference to PORC

Editorial change to correct outdated references in the Unit No. 1 PDTS, Specifications 5.5.2, 5.5.4 and 5.5.5.c, which refer to the Plant Operations Review Committee, or PORC. The PORC was combined into the Site Operation Review Committee (SORC) via a 10 CFR 50.54(a) change to the QAP. Change references to refer solely to the SORC.

5. Correct an Incorrect Reference to a Surveillance Requirement 4.4.5.1.5.b within the Unit No. 2 TS

Correct an incorrect reference to SR 4.4.5.1.5.b, within Specification 6.9.1.5.b in the Unit No. 2 TS. Specification 6.9.1.5.b states, "Reports required on an annual basis include: The complete results of steam generator tube inservice inspections performed during the report period (reference Specification 4.4.5.5.b)." However, the applicable surveillance requirement (SR) is actually SR 4.4.5.1.5.b. Unit No. 2 Specification 3.4.5, "Steam Generators," states, "The complete results of the steam generator tube inservice inspection shall be provided in the Annual Operating Report for the period in which this inspection was completed."

Revise the reference in Specification 6.9.1.5.b to refer to Surveillance Requirement 4.4.5.1.5.b rather than 4.4.5.5.b.

6. Generalize Reference to the Meteorological Information Provider In the Event of a Hurricane Within the Unit No. 2 TS

Unit No. 2 Specification 3.7.5.1, "Flood Level," specifies that at least one operable service water pump motor shall be protected against flooding based on certain conditions. SR 4.7.5.1.2 states, "The above specified meteorological conditions shall be determined at least once per 2 hours when a hurricane eye is within 150 miles of the facility. The meteorological conditions shall be determined from forecasts obtained from the Connecticut Valley, Electrical Exchange (CONVEX) and from site meteorological instrumentation."

It is proposed to replace the specific reference to the "Connecticut Valley, Electrical Exchange (CONVEX)" with the term "weather service forecasts" so that commercial weather service providers could also be utilized. The independent system operator (ISO) organization may not provide this service in the future, and means of obtaining reliable forecast information are available that were not envisioned when this specification was developed.

7. Unit No. 2 - TS 5.9, "SHORELINE PROTECTION"

Unit No. 2 Specification 5.9, "Shoreline Protection," was previously removed as part of License Amendment 189. However, several administrative corrections need to be made to properly reflect the removal of this specification. Revise Index page XV to delete the title "SHORELINE PROTECTION" and replace the title with the word "DELETED." On page 5-6 after the entry for Specification 5.8 add the words "5.9 DELETED."

## SAFETY SUMMARY

## A. RELOCATION OF INFORMATION FROM THE UNIT NOS. 2 AND 3 TS TO OTHER LICENSING BASIS DOCUMENTS

The specifications which contain information being relocated from the Design Features section (Part A of this TS change) to other licensing basis documents fall into three categories: specifications which refer to figures, specifications which list redundant design parameters, and specifications within the Unit No. 2 TS indicating that the design and maintenance of a system, structure, or component (SSC) is in accordance with a particular FSAR Section.

Specifications Which Refer To Figures

The specifications and figures describing the EAB, LPZ and the Site Boundary For Liquid And Gaseous Effluents (i.e., Unit Nos. 2 and 3 Specifications 5.1.1 and 5.1.2, and Unit No. 3 Specification 5.1.3) and the Meteorological Tower Location (i.e., Unit No. 2 Specification 5.8 and Unit No. 3 Specification 5.5) do not meet the criteria of 10 CFR 50.36(c)(4) for items to be included within the TS. Deleting these redundant specifications and corresponding figures from the respective unit TS has no impact on safety. The inclusion of this information within the Unit No. 3 FSAR, which is referenced by Unit No. 2 FSAR, will ensure that any change to either the boundaries or the zone will be evaluated under the 10 CFR 50.59 process. Removing these specifications and figures is consistent with the improved STS guidance and format (see NUREG-1431 and 1432) for the respective unit design.

Specifications Which List Redundant Design Parameters

Specification 5.2.1, "Configuration," specifies various containment design features. Specification 5.2.2 specifies that the containment building structure is designed for a maximum internal pressure, a minimum internal pressure (Unit No. 3 only) and a maximum temperature value. Specifications 5.4.1 and 5.4.2 provide the design pressure, temperature and volume parameters for the RCS. These specifications within the Unit Nos. 2 and 3 TS can be deleted because they provide redundant design information to that already located within the respective updated FSAR.

Modifications or alterations to these design features as described in the respective FSAR are controlled under the 10 CFR 50.59 change process.

Other specifications within the Unit Nos. 2 and 3 TS provide limiting conditions to monitor operational Containment and RCS parameters, such as pressure, temperature, and pressure boundary degradation. Monitoring of these operational parameters provides margin to the specific value(s) of design parameters contained in the respective FSAR and their redundant restatement currently in the TS. The specifications and figures describing the RCS and the Containment design parameters do not meet the criteria of 10 CFR 50.36(c)(4) for items to be included within the TS. Finally, removing these specifications and figures is consistent with the improved STS guidance and format (see NUREG-1431 and 1432). Therefore, these specifications and associated parameters can be deleted from the TS.

Specifications Within The Unit No. 2 TS That State That The Design And Maintenance Of A Type Of Component Or System Is In Accordance With The Design Provisions Contained In A Particular FSAR Section

Several specifications refer to sections within the Unit No. 2 FSAR and indicate that the design and maintenance of a type of component or system(s) is in accordance with the design provisions contained in that section. No new information is provided within these specifications. These specifications are:

- Unit No. 2 Specification 5.1.3, "Flood Control," refers to Section 2.5.4.2, "Tides and Flooding Due to Storms," and the associated flood control provisions in the Unit No. 2 FSAR.
- Unit No. 2 Specification 5.2.3, "Penetrations," refers to Section 5.2.8, "Containment Isolation System," in the Unit No. 2 FSAR.
- Unit No. 2 Specification 5.5, "Emergency Core Cooling Systems," refers to Section 6.3, "Safety Injection System," in the Unit No. 2 FSAR.
- Unit No. 2 Specification 5.7, "Seismic Classification," refers to Section 5.1.1, "Classes of Structures," and the associated SSC's identified as Category I Items in the Unit No. 2 FSAR.

The specifications describing the above design provisions do not meet the criteria of 10 CFR 50.36(c)(4) for items to be included within the TS. These specifications merely provide a reference to the appropriate Unit No. 2 FSAR section, where detailed information is found. Deleting these cross-referencing specifications and from the respective unit TS has no impact on safety. The inclusion of this information within the Unit No. 2 FSAR will ensure that any change to the referenced design information will be evaluated under the 10 CFR 50.59 process. Removing these specifications is consistent with the improved STS guidance and format (see NUREG-1432) for the Unit No. 2 design.

## B. SPECIFICATIONS BEING REVISED OR ADDED TO REFLECT THE GUIDANCE OF THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS

Revising Unit No. 1 PDTS, Specification 5.6.2, "Technical Specifications (TS) Bases Control Program," to be in conformance with the 10 CFR 50.59 rule change will have no impact on safety and will in actuality enhance safety by achieving greater consistency. Adding a TS bases control specification to the Unit Nos. 2 and 3 TS will allow changes to be made to the TS Bases with less effort, resulting in more frequent changes. Utilizing the TS Bases to describe specific circumstances should enhance safety.

Adding Specification 6.18, "Component Cyclic or Transient Limits," to the Unit No. 3 TS, will have no impact on safety, it merely implements via the TS a control program. Data to determine compliance with these limits has been and will continue to be captured by procedure.

## C. REMP SPECIFICATION MODIFICATIONS TO REFLECT CHANGE IN OWNERSHIP FROM NORTHEAST UTILITIES TO DNC AND TO CORRECT AN INCONSISTENCY WITHIN THE UNIT NO. 1 PDTS FOR REMP PROCEDURE PROCESSING

Removing an outdated reference to a Northeast Utilities organization, the Production Operations Services Laboratory, which is no longer applicable following the change in ownership from NU to DNC, results in no change in safety. Generalize the reference to the "Radiological Assessment Branch" by replacing the term with "organization responsible for the REMP" has no impact on safety and is consistent with the guidance of GL 88-06. This change will allow a better use of resources by making it no longer necessary to make TS changes due to a change in this organizational title.

Correcting an inconsistency within the Unit No. 1 PDTS will avoid confusion and clarify how changes to REMP procedures are processed. Clarifying this confusing set of administrative specifications has no impact on safety but will enhance understanding.

## D. MISCELLANEOUS ADMINISTRATIVE AND EDITORIAL CHANGES TO THE UNIT NOS. 1, 2 AND 3 TECHNICAL SPECIFICATIONS

Correction of these inconsistencies allows for common nomenclature in the TS between units. None of these title changes, or changes in terminology have an impact on safety, they are just being made for consistency or to avoid additional editorial changes in the future. These editorial changes involve the following:

- modifications to, or correction of inconsistencies in titles; e.g., removing the capitalization from certain titles to clearly indicate they are functional rather than specific,

- changes to a specific title,
- correcting inaccurate references to the title of the DNC Quality Assurance Program Topical Report,
- changing nomenclature from "health physics" to "radiation protection," where utilized as a general reference or specific title, to be consistent with current industry practice,
- removing outdated references to the PORC (which no longer exists),
- correcting an incorrect reference to a surveillance requirement number,

Summary

As described in Part A, the existing Design Features information is currently set forth in the various sections of the Unit Nos. 2 or 3 FSAR. The specifications which contain information being relocated from the Design Features section to other licensing basis documents fall into three categories: specifications which refer to figures, specifications which list redundant design parameters, and specifications within the Unit No. 2 TS indicating that the design and maintenance of a SSC is in accordance with a particular FSAR Section.

Specific requirements for the performance of the associated systems, structures and components are specified in the TS LCOs, in accordance with the criteria in the Final Policy Statement. The additional detailed information currently in the Design Features section for the various LCOs is not relied on to satisfy the LCOs, or relied on to avert an immediate threat to public health and safety. The information contained in the Design Features section of the respective TSs is described in the FSAR, so that any changes to these design features would have to be evaluated under 10 CFR 50.59 before they could be made. The deletion of the design features from the TS and maintenance of the information in the FSAR is consistent with the respective improved STS, i.e., NUREG-1431 or 1432.

Since the features with a potential to impact safety are sufficiently addressed by LCOs, and since design features, if altered in accordance with 10 CFR 50.59, would not result in a significant impact on safety, the criteria of 10 CFR 50.36(c)(4) requiring the inclusion of the above design features within the TSs is not met. Therefore, the deletion of the design information from the respective TSs and the relocation and maintenance of this information in the FSAR is acceptable.

Part B of this change adds programs to the respective TS for the control of the TS bases and, for Unit No. 3, control of component cyclic or transient limits. These programs formalize the control of these processes.

Part C of this change revised the REMP related specification to reflect the change in ownership from Northeast Utilities to DNC and to correct an inconsistency within the Unit No. 1 PDTS with respect to REMP procedure processing. Removing an outdated reference to a Northeast Utilities organization clarifies the TS. Correcting a change that

has the potential to confuse personnel with respect to REMP procedure processing is positive and enhances usability and indirectly safety.

Part D of this change corrected miscellaneous editorial issues in the TS to attempt to achieve consistency between the TS for each unit. Correction of editorial issues can not by it's nature involve an impact on safety.

The proposed changes have no impact on plant operation, do not alter any plant configuration, or system, structure, component functions, or their operation. The changes do not impact the acceptance criteria for any design basis accident described in the respective Unit Nos. 2 or 3 updated Final Safety Analysis Report or the Unit No. 1 Defueled Safety Analysis Report. Since the changes are solely administrative or editorial, they cannot affect the likelihood, the consequences, or introduce a new or different kind of accident. Therefore, DNC considers these proposed changes to each TS to be safe and acceptable.

Table 1

TS 5.2.1 and 5.2.2, Configuration and Design Pressure and Temperature

| | Design Feature | Unit No. 2 | | Unit No. 3 | |
|---|---|---|---|---|---|
| | | TS Value | FSAR Section | TS Value | FSAR Section |
| a. | Nominal inside diameter | 130 feet | 5.2, Containment, 5.2.1, General Description | 140 feet | 3.8.1.1.2, "Cylindrical Wall" |
| b. | Nominal inside height | 175 feet | 5.2, Containment, 5.2.1, General Description | 201 feet, 3 inches | 3.8.1.1.3, "Dome" |
| c. | Minimum thickness of concrete walls | 3.75 feet | 5.2, Containment, 5.2.1, General Description | 4 feet, 6 inches | 3.8.1.1.2, "Cylindrical Wall" |
| d. | Minimum thickness of concrete dome (or roof) | 3.25 feet | 5.2, Containment, 5.2.1, General Description | 2 feet, 6 inches | 3.8.1.1.3, "Dome" |
| e. | Minimum thickness of concrete floor pad | 8.5 feet | 5.2, Containment, 5.2.1, General Description | 10 feet | 3.8.1.1.1, "Base Foundation" |
| f. | Nominal thickness of steel liner | 1/4 inch | 5.2, Containment, 5.2.1, General Description | Liner thickness:<br>1/4 in. (floor)<br>3/8 in. (wall)<br>1/2 in. (dome) | Sections involving liner:<br>3.8.1.1.1, "Base Foundation"<br>3.8.1.1.4.A, "Steel Liner"<br>3.8.1.1.3, "Dome" |
| g. | Net free volume | 1.9 x $E^6$ cubic feet | 5.2, Containment, 5.2.1, General Description | 2.26 x $E^6$ cubic feet | Table 15.6-9, Assumptions Used For the Radiological Consequences of a LOCA Analysis |

The FSAR sections referred to in the above table are representative FSAR sections. Other FSAR sections, figures and tables may also contain the value of the parameter.

Table 2

TS 5.2.1 and 5.2.2, Configuration and Design Pressure and Temperature

| | Design Feature | Unit No. 2 | | Unit No. 3 | |
|---|---|---|---|---|---|
| | | TS Value | FSAR Section | TS Value | FSAR Section |
| a. | Minimum internal pressure | ---- | 5.2, Containment, 5.2.1, General Description | 8 psia | 3.8.1.1.2, "Cylindrical Wall" |
| b. | Maximum internal pressure | 54 psig | 5.2, Containment, 5.2.1, General Description | 59.7 psia | 3.8.1.1.3, "Dome" |
| c. | Temperature | 289°F | 5.2, Containment, 5.2.1, General Description | 280°F | 3.8.1.1.2, "Cylindrical Wall" |

The FSAR sections referred to in the above table are representative FSAR sections. Other FSAR sections, figures and tables may also contain the value of the parameter.

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Attachment 2

Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3

Technical Specification Change Request
Administrative and Editorial Changes to the Unit Nos. 1, 2 and 3
Technical Specifications
Significant Hazards Consideration

**Technical Specification Change Request**
**Administrative And Editorial Changes To The Unit Nos. 1, 2 and 3**
**Technical Specifications**
**Significant Hazards Consideration**

Description of the Proposed Change

Dominion Nuclear Connecticut, Inc. (DNC) proposes to amend Operating License Nos. DPR-21, DPR-65 and NPF-49 by incorporating administrative and editorial changes into the Millstone Unit No. 1 Permanently Defueled Technical Specifications (PDTS) and into the Millstone Unit Nos. 2 and 3 Technical Specifications (TS).

This change proposes to relocate redundant design features information (i.e., information already included in other licensing basis (LB) documents, e.g., the Final Safety Analysis Report), from Section 5.0, "Design Features," of the Unit Nos. 2 and 3 TS, to other LB documents, consistent with the improved Standard Technical Specifications (STS)[1][2] for the respective unit design. Several other administrative changes are also proposed to the Unit Nos. 1, 2 and 3 TS:

- Revise Specification 5.6.2, "Technical Specifications (TS) Bases Control Program," in the Unit No. 1 PDTS, in accordance with TSTF-364[3] to incorporate the 10 CFR 50.59 rule change. Add a new specification, i.e., Specification 6.22 for Unit No. 2 and 6.17 for Unit No. 3, to incorporate a TS bases control program within the Unit Nos. 2 and 3 TS.

- Add a new Specification, i.e., 6.18, "Component Cyclic or Transient Limits," to the Unit No. 3 TS to define the program for tracking cyclic (or transient) limits. These limits are proposed to be relocated from where they are listed in Specification 5.7, "Component Cyclic or Transient Limit," in the Unit No. 3 TS, to the Final Safety Analysis Report (FSAR).

Also, two changes are proposed to revise the Unit Nos. 1, 2 and 3 TS related to Radiological Environmental Monitoring Program (REMP) procedure processing to:

- Remove reference to an organization affiliated with Northeast Utilities (NU), the Production Operations Services Laboratory (POSL), which is no longer applicable following the change in ownership from NU to DNC. Replace the reference to the Radiological Assessment Branch (a Millstone DNC organization) with the "organization responsible for the REMP" for review/approval of changes to the

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(1) NUREG - 1432, Revision 2, "Standard Technical Specifications - Combustion Engineering Plants," April 2001.

(2) NUREG - 1431, Revision 2, "Standard Technical Specifications - Westinghouse Plants," April 2001.

(3) Technical Specification Task Force (TSTF)-364, "Revision to TS Bases Control Program to Incorporate Changes to 10 CFR 50.59," Approved June 16, 2000.

REMP to avoid future TS changes due to a change in organizational titles. This is consistent with the guidance of Generic Letter 88-06.[4]

- Correct an inconsistency within the Unit No. 1 PDTS which implies that REMP procedures are processed under the general procedure processing specification, i.e., Specification 5.5.1, in addition to the specific specifications for processing REMP procedure changes, i.e., Specifications 5.5.6 and 5.5.7.

Additionally, changes are proposed to correct miscellaneous editorial issues and achieve consistency between the TS for each unit. These changes include: 1) changes to and corrections in titles, 2) correct references to the quality assurance program, and 3) change titles to utilize the term radiation protection rather than health physics.

Significant Hazards Consideration

In accordance with 10 CFR 50.92, DNC has reviewed the proposed changes and concluded that the changes do not involve a Significant Hazards Consideration (SHC). The basis for this conclusion is that the three criteria of 10 CFR 50.92(c) are not compromised. The proposed changes do not involve an SHC because the changes would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed changes related to Section 5, "Design Features," of the Unit Nos. 2 or 3 TS either relocates or deletes certain details from the Technical Specifications and relocates them to the respective unit's updated FSAR or other plant controlled documents. The FSAR and other plant controlled documents will be maintained in accordance with 10 CFR 50.59. The proposed changes to Section 6, "Administrative Controls," adds new administrative specifications consistent with the guidance of the improved STS, corrects inconsistencies, or represents changes in nomenclature, and will correct editorial issues and achieve consistency within the individual TS and between individual TS. The changes are purely administrative or editorial and do not alter any regulatory requirements or have an impact on the acceptance criteria for any design basis accident described in the respective Unit Nos. 2 or 3 FSAR or the Unit No. 1 Defueled Safety Analysis Report (DSAR).

   These changes have no impact on plant equipment operation. Since the changes are solely an administrative or editorial change to the TS, they cannot affect the likelihood or consequences of accidents. Therefore, these changes

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(4) U. S. Nuclear Regulatory Commission, Generic Letter 88-06, "Removal of Organization Charts From Technical Specification Administrative Control Requirements," dated March 22, 1988.

will not increase the probability or consequences of an accident previously evaluated.

2. Create the possibility of a new or different kind of accident from any accident previously evaluated.

   The proposed changes have no impact on plant operation. Since the proposed changes are solely an administrative or editorial change to the TS, they do not affect plant operation in any way. The proposed changes do not involve a physical alteration of the plant or change the plant configuration (no new or different type of equipment will be installed). The proposed changes do not require any new or unusual operator actions. The changes do not alter the way any structure, system, or component functions and do not alter the manner in which the plant is operated. The changes do not introduce any new failure modes. Therefore, the proposed changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Involve a significant reduction in a margin of safety.

   Since the proposed changes are solely administrative or editorial changes to the TS, they do not affect plant operation in any way. The proposed changes to the respective unit's technical specifications will standardize terminology, remove extraneous information and make minor format changes that will not result in any technical changes to current requirements.

   The proposed changes do not impact any acceptance criteria for the design basis accidents described in the respective Unit Nos. 2 or 3 FSAR or the Unit No. 1 DSAR and do not impact the consequences of accidents previously evaluated. Therefore, the proposed changes will not result in a reduction in a margin of safety.

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Attachment 3

Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3

Technical Specification Change Request
Administrative and Editorial Changes to the Unit Nos. 1, 2 and 3
Technical Specifications
Marked-up Unit No. 1 Permanently Defueled Technical Specifications Pages

Technical Specification Change Request
Administrative Changes To The Unit Nos. 1, 2 and 3 TS

Marked-up Unit No. 1 Permanently Defueled Technical Specification Pages

Changes to the following Technical Specification pages have been proposed.

| Technical Specification Section Numbers | Title(s) of Section(s) | Affected Pg. and Amendment No. |
|---|---|---|
| 5.1.1 | RESPONSIBILITY | Page 5.0-1 Am. No. 106 |
| 5.1.3 | RESPONSIBILITY | Page 5.0-1 Am. No. 106 |
| 5.2.1.a | ONSITE AND OFFSITE ORGANIZATIONS | Page 5.0-2 Am. No. 106 |
| 5.2.1.b | ONSITE AND OFFSITE ORGANIZATIONS | Page 5.0-2 Am. No. 106 |
| 5.2.1.c | ONSITE AND OFFSITE ORGANIZATIONS | Page 5.0-2 Am. No. 106 |
| 5.3.1.1 | FACILITY STAFF QUALIFICATIONS | Page 5.0-5 Am. No. 106 |
| 5.3.1.2 | FACILITY STAFF QUALIFICATIONS | Page 5.0-5 Am. No. 106 |
| 5.5.1.d | PROCEDURES | Page 5.0-7 Am. No. 109 |
| 5.5.1.g | PROCEDURES | Page 5.0-7 Am. No. 109 |
| 5.5.2 | PROCEDURES | Page 5.0-7 Am. No. 109 |
| 5.5.3 | PROCEDURES | Page 5.0-7 Am. No. 109 |
| 5.5.4 | PROCEDURES | Page 5.0-8 Am. No. 106 |
| 5.5.5.c | PROCEDURES | Page 5.0-8 Am. No. 106 |
| 5.5.6 | PROCEDURES | Page 5.0-8 Am. No. 106 |

Technical Specification Change Request
Administrative Changes To The Unit Nos. 1, 2 and 3 TS

Marked-up Unit No. 1 Permanently Defueled Technical Specification Pages

| Technical Specification Section Numbers | Title(s) of Section(s) | Affected Pg. and Amendment No. |
|---|---|---|
| 5.5.7 | PROCEDURES | Page 5.0-8<br>Am. No. 106 |
| 5.6.2.b | TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM | Page 5.0-11<br>Am. No. 106 |
| 5.8.1 | HIGH RADIATION AREA | Page 5.0-18<br>Am. No. 106 |
| 5.8.2 | HIGH RADIATION AREA | Page 5.0-19<br>Am. No. 106 |

# 5.0 ADMINISTRATIVE CONTROLS

## 5.1 Responsibility

5.1.1 The Designated Officer shall be responsible for overall operation of the Millstone Station Site and shall delegate, in writing, the succession to this responsibility. The Designated Manager shall be responsible for overall Unit safe operation and shall delegate in writing the succession of this responsibility.

5.1.2 The Shift Manager shall be responsible for the control room command function.

5.1.3 Unless otherwise defined, the technical specification titles for members of the staff are generic titles. Unit-specific titles for the functions and responsibilities associated with these generic titles are identified in the Quality Assurance Topical Report.

Program

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite And Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safe storage of irradiated fuel.

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

b. The Designated Manager shall be Program responsible for overall unit safe operation and shall have control over those onsite activities and resources necessary for maintenance and storage of irradiated fuel in a safe condition.

c. The Designated Officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to ensure the safe storage of irradiated fuel.

d. The individuals who train the CERTIFIED FUEL HANDLERS and those who carry out radiation protection functions or perform quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ability to perform their assigned functions.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.3 Facility Staff Qualifications

5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for:

5.3.1.1 The Operations Manager or Assistant Operations Manager shall be a CERTIFIED FUEL HANDLER.

5.3.1.2 The Health Physics Manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1, May 1977.

radiation protection

## 5.0 ADMINISTRATIVE CONTROLS

### 5.5 Procedures

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

a. The procedures applicable to the safe storage of irradiated fuel recommended in Appendix "A" of Regulatory Guide 1.33, February 1978;

b. Fire Protection Program implementation; Regulatory Guide 1.21, Rev. 1, June 1974;

c. Cold Weather Operations;

d. Quality Controls for effluent monitoring, using the guidance in assurance for radiological effluent and environmental monitoring;

e. Liquid and gaseous radioactive effluent discharges from the unit for all operations involving offsite releases of radioactive effluents. These procedures shall specify the use of appropriate waste treatment utilizing the guidance provided in the REMODCM;

f. Fuel handling operations;

g. All programs specified in Specification 5.6, except for Section I.E, Radiological Environmental Monitoring of REMODCM, which is performed in accordance with Specifications 5.5.6 and 5.5.7.

5.5.2 The Designated Manager, Designated Officer, or Designated Senior Officer may designate specific procedures and programs, or classes of procedures and programs to be reviewed in accordance with the Station Qualified Reviewer Program in lieu of review by the PORC or SORC. The review per the PORC, SORC$_X$ or Station Qualified Reviewer Program shall be in accordance with the Quality Assurance Program Topical Report.

5.5.3 Procedures listed in Specification 5.5.1 and changes thereto, shall be approved by the Designated Manager, or Designated Officer or by cognizant managers or directors who are designated as the Approval Authority by the Designated Manager, or Designated Officer as specified in administrative procedures. The Approval Authority for each procedure and program or class of procedure and program shall be specified in administrative procedures.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.5 Procedures (continued)

5.5.4 Each procedure of Specification 5.5.1, and changes thereto, shall be reviewed by the PORC or SORC and shall be approved by the Designated Manager or Designated Officer, or be reviewed and approved in accordance with the Station Qualified Reviewer Program prior to implementation. Each procedure of Specification 5.5.1 shall be reviewed periodically as set forth in administrative procedures.

5.5.5 Temporary changes to procedures of Specification 5.5.1 above may be made provided:

a. the intent of the original procedure is not altered;

b. the change is approved by two members of the plant management staff, at least one of whom is a CERTIFIED FUEL HANDLER;

c. the change is documented, reviewed by the PORC or SORC or the Station Qualified Reviewer Program, as applicable, and approved by the Designated Manager, Designated Officer, or the Station Qualified Reviewer Program Department Manager within 14 days of implementation.

5.5.6 All procedures and (REMP) procedure changes required for the Radiological Environmental Monitoring Program of Specification 5.6.1 shall be reviewed by an individual (other than the author) from the Radiological Assessment Branch or the Production Operation Services Laboratory (POSL) and approved by appropriate supervision.

5.5.7 Temporary changes may be made for the Radiological Environmental Monitoring Program provided the intent of the original procedure is not altered and the change is documented and reviewed by an individual (other than the author) from the Radiological Assessment Branch or the POSL within 14 days of implementation.

organization responsible for the REMP

5.0 ADMINISTRATIVE CONTROLS

5.6 Programs and Manuals

5.6.2 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications

a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

b. Licensees may make changes to Bases without prior NRC approval provided the changes do not involve either of the following:

1. A change in the TS incorporated in the license; or

2. A change to the updated FSAR or Bases that involves an unreviewed safety question as defined in 10CFR50.59.

c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.

d. Proposed changes that meet the criteria of Specification 5.6.2b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10CFR50.71(e).

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.8 High Radiation Area

5.8 High Radiation Area

5.8.1 Pursuant to 10CFR Part 20.1601(c), in lieu of the requirements of 10CFR Part 20.1601(a), each high radiation area as defined in 10 CFR Part 20 shall be barricaded and conspicuously posted as a high radiation area, and entrance thereto shall be controlled by requiring issuance of a radiation work permit or equivalent. Individuals trained and qualified in radiation protection procedures (e.g., a health physics technician) or personnel continuously escorted by such individuals may be exempted from this RWP requirement while performing their assigned duties in high radiation areas where radiation doses could be received that are equal to or less than 1 rem in 1 hour (measured at 30 centimeters from any source of radiation) provided they are otherwise following plant radiation protection procedures, or a general radiation protection RWP, for entry into such high radiation areas.

radiation protection

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

a. A radiation monitoring device that continuously indicates the radiation dose rate in the area,

b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rates in the area have been determined and personnel have been made knowledgeable of them,

c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device. This individual is responsible for providing positive radiation protection control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation protection procedures or the applicable RWP.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.8 High Radiation Area

5.8 High Radiation Area (continued)

radiation protection

5.8.2 In addition to the requirements of Specification 5.8.1, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked or continuously guarded doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the appropriate supervisor on duty or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the RWP, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

5.8.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.

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Attachment 4

Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3

Technical Specification Change Request
Administrative and Editorial Changes to the Unit Nos.1, 2 and 3
Technical Specifications
Marked-up Unit No. 2 Technical Specifications Pages

Technical Specification Change Request
Administrative Changes To The Unit Nos. 1, 2 and 3 TS

Marked-up Unit No. 2 Technical Specification Pages

Changes to the following Technical Specification pages have been proposed.

| Technical Specification Section Numbers | Title(s) of Section(s) | Affected Pg. and Amendment No. |
|---|---|---|
| Index - 5.1 | SITE | Page XV, Am. No. 109 |
| Index - 5.2 | CONTAINMENT | Page XV, Am. No. 109 |
| Index - 5.4 | REACTOR COOLANT SYSTEM | Page XV, Am. No. 109 |
| Index - 5.5 | EMERGENCY CORE COOLING SYSTEMS | Page XV, Am. No. 109 |
| Index - 5.7 | SEISMIC CLASSIFICATION | Page XV, Am. No. 109 |
| Index - 5.8 | METEOROLOGICAL TOWER LOCATION | Page XV, Am. No. 109 |
| Index - 5.9 | SHORELINE PROTECTION | Page XV, Am. No. 109 |
| Index - 6.22 | TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM | Page XVII (Reverse of Page XVII), Am. No. 250 |
| 3.7.5.1 | FLOOD LEVEL (SR 4.7.5.1.2) | Page 3/4 7-14, (August 1, 1975) |
| 5.1 | SITE | Page 5-1, Am. No. 216 |
| 5.1.1 | EXCLUSION AREA | Page 5-1, Am. No. 216 |
| 5.1.2 | LOW POPULATION ZONE | Page 5-1, Am. No. 216 |
| 5.1.3 | FLOOD CONTROL | Page 5-1, Am. No. 216 |

Technical Specification Change Request
Administrative Changes To The Unit Nos. 1, 2 and 3 TS

Marked-up Unit No. 2 Technical Specification Pages

| Technical Specification Section Numbers | Title(s) of Section(s) | Affected Pg. and Amendment No. |
|---|---|---|
| 5.2 | CONTAINMENT | Page 5-1, Am. No. 216 |
| 5.2.1 | CONFIGURATION | Page 5-1, Am. No. 216 |
| Figure 5.1-1 | EXCLUSION AREA | Page 5-2, Am. No. 256 |
| Figure 5.1-2 | LOW POPULATION ZONE | Page 5-3 (August 1, 1975) |
| 5.2.2 | DESIGN PRESSURE AND TEMPERATURE | Page 5-4, Am. No. 216 |
| 5.2.3 | PENETRATIONS | Page 5-4, Am. No. 216 |
| 5.4 | REACTOR COOLANT SYSTEM | Page 5-4, Am. No. 216 |
| 5.4.1 | DESIGN PRESSURE AND TEMPERATURE | Page 5-4, Am. No. 216 |
| 5.4.2 | VOLUME | Page 5-5, Am. No. 215 |
| 5.5 | EMERGENCY CORE COOLING SYSTEMS | Page 5-5, Am. No. 215 |
| 5.7 | SEISMIC CLASSIFICATION | Page 5-6, Am. No. 216 |
| 5.8 | METEOROLOGICAL TOWER LOCATION | Page 5-6, Am. No. 216 |
| 5.9 | "DELETED" | Page 5-6, Am. No. 216 |
| 6.1.3 | RESPONSIBILITY | Page 6-1, Am. No. 235 |
| 6.2.1.a | OFFSITE AND ONSITE ORGANIZATIONS | Page 6-1, Am. No. 235 |

Technical Specification Change Request
Administrative Changes To The Unit Nos. 1, 2 and 3 TS

Marked-up Unit No. 2 Technical Specification Pages

| Technical Specification Section Numbers | Title(s) of Section(s) | Affected Pg. and Amendment No. |
|---|---|---|
| 6.2.1.d | OFFSITE AND ONSITE ORGANIZATIONS | Page 6-1, Am. No. 235 |
| 6.2.2.d | FACILITY STAFF | Page 6-2, Am. No. 191 |
| 6.3.1.a | FACILITY STAFF QUALIFICATIONS | Page 6-2, Am. No. 191 |
| 6.3.1.c | FACILITY STAFF QUALIFICATIONS | Page 6-3, Am. No. 178 |
| Table 6.2-1, Item (2) | MINIMUM SHIFT-CREW COMPOSITION | Page 6-4, Am. No. 178 |
| 6.8.2.b | PROCEDURES | Page 6-15, Am. No. 250 |
| 6.8.5 | PROCEDURES | Page 6-16, Am. No. 163 |
| 6.9.1.5.b | ANNUAL REPORTS | Page 6-17, Am. No. 163 |
| 6.12.1, 6.12.1.c | HIGH RADIATION AREA | Page 6-22, Am. No. 239 |
| 6.12.2 | HIGH RADIATION AREA | Page 6-23, Am. No. 163 |
| 6.22 | TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM (New Spec.) | Page 6-28, Am. No. 250 |

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No Changes For Information Only

PLANT SYSTEMS

3/4.7.5 FLOOD LEVEL

LIMITING CONDITION FOR OPERATION

3.7.5.1 At least one OPERABLE service water pump motor shall be protected against flooding to a minimum elevation of 28 feet Mean Sea Level USGS datum if either:

a. The water level, including wave crest height, is exceeding plant grade level (14.0 feet Mean Sea Level USGS datum), or

b. Three or more of the following conditions are occurring simultaneously:

1. The center of a storm, as determined by radar, reconnaissance or forecasted track projection, is presently located within the critical area as defined on Figure 3.7-1.

2. The projected track of a storm approaching the facility as determined by radar, reconnaissance or forecasted track projection, lies between 130° and 350°.

3. The central pressure of the storm is or is forecasted to be $\leq$ 28.0 in. Hg; or the measured 15 minute average wind speed at nominal elevation 389 on the meteorological tower exceeds 60 mph.

4. The 15 minute average wind direction at nominal elevation 389 on the meteorological tower is within the sector from 150° clockwise to 300°.

APPLICABILITY: ALL MODES

ACTION:

With the water level exceeding either plant grade or with three or more of the above specified meteorological conditions being exceeded simultaneously, immediate initiate action to protect at least one service water pump motor against flooding to a minimum elevation of 28 feet; complete this protective action within 2 hours.

SURVEILLANCE REQUIREMENTS

4.7.5.1.1 The water level shall be determined to be below plant grade at least once per hour when the eye of a hurricane is within 150 miles of the facility.

4.7.5.1.2 The above specified meteorological conditions shall be determined at least once per 2 hours when a hurricane eye is within 150 miles of the facility. The meteorological conditions shall be determined from forecasts obtained from the Connecticut Valley Electrical Exchange (CONVEX) and from the site meterological instrumentation.

weather service forecasts and/or

## 5.0 DESIGN FEATURES

### 5.1 SITE ← Insert "A"

EXCLUSION AREA

5.1.1 The exclusion area is shown on Figure 5.1-1.

LOW POPULATION ZONE

5.1.2 The low population zone is shown on Figure 5.1-2.

FLOOD CONTROL

5.1.3 The flood control provisions shall be designed and maintained in accordance with the design provisions contained in Section 2.5.4.2 of the FSAR.

### 5.2 CONTAINMENT ← DELETED

CONFIGURATION

5.2.1 The reactor containment building is a steel lined, reinforced concrete building of cylindrical shape, with a dome roof and having the following design features:

a. Nominal inside diameter = 130 feet.

b. Nominal inside height = 175 feet.

c. Minimum thickness of concrete walls = 3.75 feet.

d. Minimum thickness of concrete dome = 3.25 feet.

e. Minimum thickness of concrete floor pad = 8.5 feet.

f. Nominal thickness of steel liner = 0.25 inches.

g. Net free volume = $1.9 \times 10^6$ cubic feet.

INSERT 'A' - Page 5-1

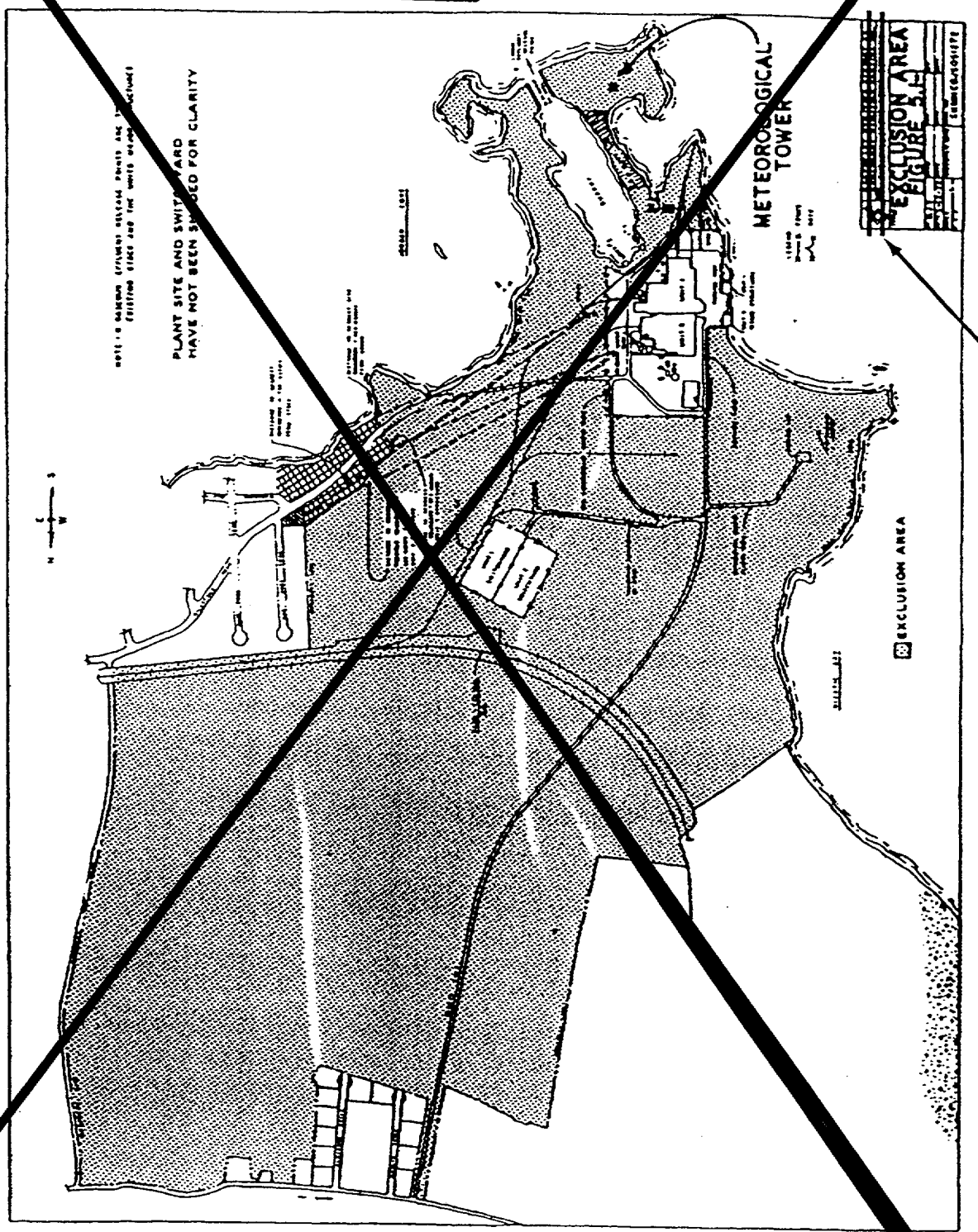
## 5.1 SITE LOCATION

The Unit 2 Containment Building is located on the site at Millstone Point in Waterford, Connecticut. The nearest site boundary on land is 2034 feet northeast of the containment building wall (1627 feet northeast of the elevated stack), which is the minimum distance to the boundary of the exclusion area as described in 10 CFR 100.3(a). No part of the site that is closer than these distances shall be sold or leased except to Dominion Nuclear Connecticut, Inc. or its corporate affiliates for use in conjunction with normal utility operations.

March 31, 2001

~~August 1, 1975~~

Delete

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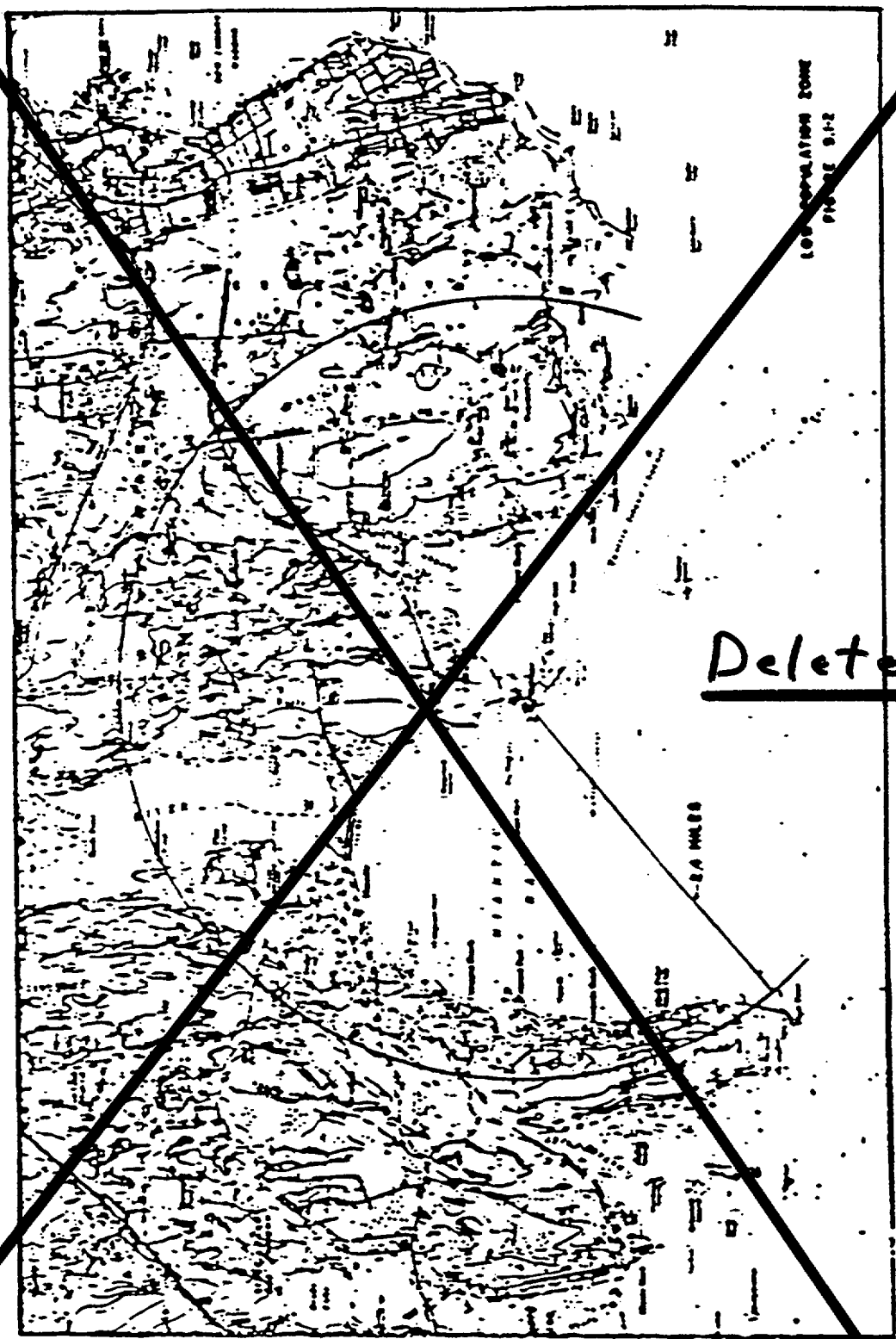
CONNECTICUT, INC.



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DESIGN PRESSURE AND TEMPERATURE

5.2.2 The reactor containment building is designed and shall be maintained for a maximum internal pressure of 54 psig and an equilibrium liner temperature of 289°F.

PENETRATIONS

5.2.3 Penetrations through the reactor containment building are designed and shall be maintained in accordance with the design provisions contained in Section 5.2.8 of the FSAR with allowance for normal degradation pursuant to the applicable Surveillance Requirements.

5.3 REACTOR CORE

FUEL ASSEMBLIES

5.3.1 The reactor core shall contain 217 fuel assemblies with each fuel assembly containing 176 rods. Reload fuel shall be similar in physical design to the initial core loading and shall have a maximum enrichment of 4.5 weight percent of U-235.

CONTROL ELEMENT ASSEMBLIES

5.3.2 The reactor core shall contain 73 full length and no part length control element assemblies. The control element assemblies shall be designed and maintained in accordance with the design provisions contained in Section 3.0 of the FSAR with allowance for normal degradation pursuant to the applicable Surveillance Requirements.

5.4 REACTOR COOLANT SYSTEM ← DELETED

DESIGN PRESSURE AND TEMPERATURE

5.4.1 The reactor coolant system is designed and shall be maintained:

a. In accordance with the code requirements specified in Section 4.2.2 of the FSAR with allowance for normal degradation pursuant of the applicable Surveillance Requirements,

b. For a pressure of 2500 psia, and

c. For a temperature of 650°F except for the pressurizer which is 700°F.

VOLUME

5.4.2 The total water and steam volume of the reactor coolant system is a nominal 10,981 $ft^3$.

5.5 EMERGENCY CORE COOLING SYSTEMS ← DELETED

5.5.1 The emergency core cooling systems are designed and shall be maintained in accordance with the design provisions contained in Section 6.3 of the FSAR with allowance for normal degradation pursuant to the applicable Surveillance Requirements.

5.6 FUEL STORAGE

CRITICALITY

5.6.1 a) The new fuel (dry) storage racks are designed and shall be maintained with sufficient center to center distance between assemblies to ensure a $k_{eff} \leq .95$. The maximum nominal fuel enrichment to be stored in these racks is 4.50 weight percent of U-235.

b) Region A of the spent fuel storage pool is designed and shall be maintained with a nominal 9.8 inch center to center distance between storage locations to ensure a $K_{eff} \leq .95$ with the storage pool filled with unborated water. Fuel assemblies stored in this region must comply with Figure 3.9-4 to ensure that the design burnup has been sustained.

c) Region B of the spent fuel storage pool is designed and shall be maintained with a nominal 9.8 inch center-to-center distance between storage locations to ensure $K_{eff} \leq .95$ with a storage pool filled with unborated water. Fuel assemblies stored in this region may have a maximum nominal enrichment of 4.5 weight percent U-235. Fuel assemblies stored in this region are placed in a 3 out of 4 STORAGE PATTERN for reactivity control.

d) Region C of the spent fuel storage pool is designed and shall be maintained with a 9.0 inch center to center distance between storage locations to ensure a $K_{eff} \leq .95$ with the storage pool filled with unborated water. Fuel assemblies stored in this region must comply with Figures 3.9-1a or 3.9-1b to ensure that the design burn-up has been sustained. Additionally, fuel assemblies utilizing Figure 3.9-1b require that borated stainless steel poison pins are installed in the fuel assembly's center guide tube and in two diagonally opposite guide tubes. The poison pins are solid 0.87 inch O.D. borated stainless steel, with a boron content of 2 weight percent boron.

e) Region C of the spent fuel storage pool is designed to permit storage of consolidated fuel and ensure a $K_{eff} \leq 0.95$. The contents of consolidated fuel storage boxes to be stored in this region must comply with Figure 3.9-3.

No Changes Included for Information 03/01/94



DRAINAGE

5.6.2 The spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool below elevation 22'6".

CAPACITY

5.6.3 The spent fuel storage pool is designed and shall be maintained with a storage capacity limited to no more than 224 storage locations in Region A, 160 storage locations in Region B and 962 storage locations in Region C for a total of 1346 storage locations.*

*This translates into 1306 storage locations to receive spent fuel and 40 storage locations to remain blocked.

5.7 SEISMIC CLASSIFICATION ← DELETED

5.7.1 Those structures, systems and components identified as Category I Items in Section 5.1.1 of the FSAR shall be designed and maintained to the design provisions contained in Section 5.8 of the FSAR with allowance for normal degradation pursuant to the applicable Surveillance Requirements.

5.8 METEOROLOGICAL TOWER LOCATION ← DELETED

5.8.1 The meteorological tower location shall be as shown on Figure 5.1-1.

5.9 DELETED

## 6.1 RESPONSIBILITY

6.1.1 The designated officer shall be responsible for overall operation of the Millstone Station Site and shall delegate in writing the succession to this responsibility. The designated manager shall be responsible for overall Unit safe operation and shall delegate in writing the succession to this responsibility.

6.1.2 The Shift Manager shall be responsible for the control room command function.

6.1.3 Unless otherwise defined, the technical specification titles for members of the staff are generic titles. Unit specific titles for the functions and responsibilities associated with these generic titles are identified in the Quality Assurance Topical Report.

## 6.2 ORGANIZATION

### 6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

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

a. Lines of authority, responsibility, and communication shall be established and defined for the higher management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Quality Assurance Topical Report.

b. The designated manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. The designated officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operation, maintaining, and providing technical support to the plant to ensure nuclear safety.

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

### 6.2.2 FACILITY STAFF

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

6.2.2 FACILITY STAFF (Continued)

b. At least one licensed Operator shall be in the control room when fuel is in the reactor.

c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.

No Changes Included for Information

FACILITY STAFF (CONTINUED)

d. A radiation protection technician An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. (Table 6.2-1) ||

e. ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions. These procedures should follow the general guidance of the NRC Policy Statement on working hours (Generic Letter No. 82-12). | 191 11/2/95

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for:

a. If the Operations Manager does not hold a senior reactor operator license for Millstone Unit No. 2, then the Operations Manager shall have held a senior reactor operator license at a Pressurized Water Reactor and an individual serving in the capacity of the Assistant Operations Manager shall hold a senior reactor operator license for Millstone Unit No. 2. || | 190 11/2/95

b. The Shift Technical Advisor (STA) who shall meet the requirements of Specification 6.3.1.b.1 or 6.3.1.b.2.

1. Dual-role individual: Must hold a senior reactor operator's license at Millstone Unit No. 2, meet the STA training criteria of NUREG-0737, Item I.A.1.1, and meet one of the following educational alternatives:

a. Bachelor's degree in engineering from an accredited institution;

b. Professional Engineer's license obtained by the successful completion of the PE examination;

c. Bachelor's degree in engineering technology from an accredited institution, including course work in the physical, mathematical, or engineering sciences;

d. Bachelor's degree in a physical science from an accredited institution, including course work in the physical, mathematical, or engineering sciences;

e. Successful completion of the Memphis State University (MSU) STA program. (Note: This alternative is only acceptable for individuals who have completed the program prior to December 31, 1986); or

f. Successful completion of the Thames Valley State Technical College associate's degree in Nuclear Engineering Technology program, provided that the individual was enrolled in the program by October 1, 1987.

2. Dedicated STA: Must meet the STA training criteria of NUREG-0737, Item I.A.1.1, and have received specific training in plant design, and response and analysis of the plant for transients and accidents.

c. The Health Physics Manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1, May 1977.

radiation protection

November 3, 1995

TABLE 6.2-1[3]

MINIMUM SHIFT-CREW COMPOSITION[2]

| LICENSE CATEGORY | APPLICABLE MODES 1, 2, 3 & 4 | 5 & 6 |
|---|---|---|
| Senior Reactor Operator | 2 | 1[1] |
| Reactor Operator | 2 | 1 |
| Non-Licensed Operator | 2 | 1 |
| Shift Technical Advisor | 1[4] | None Required |

(1) Does not include the licensed Senior Reactor or Senior Reactor Operator Limited to Fuel Handling individual supervision CORE ALTERATIONS after the initial fuel loading.

(2) The above shift crew composition and the qualified radiation protection health physics technician of Section 6.2.2 may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided expeditious actions are taken to fill the required position.

(3) Requirements for minimum number of licensed operators on shift during operation in modes other than cold shutdown or refueling are contained in 10CFR50.54(m).

(4) The Shift Technical Advisor position can be filled by either of the two Senior Reactor Operators (a dual-role individual), if he meets the requirements of Specification 6.3.1.b.1.

6.4 TRAINING

A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.59 shall be maintained.

6.5 Deleted.

No Changes Included for Information

f. Fire Protection Program implementation.

g. Quality Control for effluent monitoring using the guidance in Regulatory Guide 1.21 Rev. 1, June 1974.

h. Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMODCM) implementation, except for Section I.E., Radiological Environmental Monitoring.

6.8.2 a. The designated manager or designated officer or designated senior officer may designate specific procedures and programs, or classes of procedures and programs to be reviewed in accordance with the Quality Assurance Program Topical Report.

b. Procedures and programs listed in Specification 6.8.1, and changes thereto, shall be approved by the designated manager or designated officer or by cognizant Managers or Directors who are designated as the Approval Authority by the designated manager or designated officer, as specified in administrative procedures. The Approval Authority for each procedure and program or class of procedure and program shall be specified in administrative procedures.

c. Each procedure of Specification 6.8.1, and changes thereto, shall be reviewed and approved in accordance with the Quality Assurance Program Topical Report, prior to implementation. Each procedure of Specification 6.8.1 shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.

c. The change is documented, reviewed and approved in accordance with the Quality Assurance Program Topical Report within 14 days of implementation.

6.8.4 Written procedures shall be established, implemented and maintained covering Section I.E, Radiological Environmental Monitoring, of the REMODCM.

(REMP)

6.8.5 All procedures and procedure changes required for the Radiological Environmental Monitoring Program of 6.8.4 above shall be reviewed by an individual (other than the author) from the Radiological Assessment Branch or the Production Operation Services Laboratory (POSL) and approved by appropriate supervision.

organization responsible for the REMP

Temporary changes may be made provided the intent of the original procedure is not altered and the change is documented and reviewed by an individual (other than the author) from the Radiological Assessment Branch or the POSL, within 14 days of implementation.

organization responsible for the REMP

6.9 REPORTING REQUIREMENTS

Routine Reports

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, one copy to the Regional Administrator, Region I, and one copy to the NRC Resident Inspector, unless otherwise noted.

Startup Report

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ANNUAL REPORTS[1]

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Reports required on an annual basis shall include:

a. A tabulation, on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions,[2] e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

b. The complete results of steam generator tube inservice inspections performed during the report period (reference Specification ~~4.4.5.5.b~~ 4.4.5.1.5.b). 1

c. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

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1 A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

2 This tabulation supplements the requirements of 20.407 of 10 CFR Part 20.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 Pursuant to paragraph 20.203(c)(5) of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph 20.203(c), each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Health Physics Technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

radiation protection

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area; or

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or

c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Health Physics Manager in the RWP.

radiation protection

6.12 HIGH RADIATION AREA (CONT.)

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Supervisor on duty and/or Health Physics supervision. Doors shall remain locked except during period of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed-circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For individual high radiation areas accessible to personnel with radiation levels greater than 1000 mR/h that are located within large areas where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

6.13 SYSTEMS INTEGRITY

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

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and

2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

6.14 IODINE MONITORING

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

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

c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the REMODCM;

d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;

e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the REMODCM at least every 31 days;

f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;

g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the site boundary to a dose rate which, if the release were to occur for a full year, would cause a dose of 500 mrem. This conforms to the dose associated with the 1993 version of 10 CFR 20, Appendix B, Table II, Column I;

h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;

i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and

j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

6.21 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provided (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the REMODCM, (2) conform to that guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

a. Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the REMODCM.

b. A Land Use Census to ensure that changes in the use of areas at and beyo. the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and

c. Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

INSERT 'B' - Page 6-28

6.22 TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM

This program provides a means for processing changes to the Bases of these Technical Specifications.

a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:

   1. A change in the TS incorporated in the license or

   2. A change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.

d. Proposed changes that meet the criteria of Specification 6.22.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

Docket Nos. 50-245
50-336
50-423
B18415

Attachment 5

Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3

Technical Specification Change Request
Administrative and Editorial Changes to the Unit Nos. 1, 2 and 3
Technical Specifications
Marked-up Unit No. 3 Technical Specifications Pages

Technical Specification Change Request
Administrative Changes To The Unit Nos. 1, 2 and 3 TS

Marked-up Unit No. 3 Technical Specification Pages

Changes to the following Technical Specification pages have been proposed.

| Technical Specification Section Numbers | Title(s) of Section(s) | Affected Pg. And Amendment No. |
|---|---|---|
| Index - 5.1 | SITE | Page xvii |
| Index - 5.1.1 | EXCLUSION AREA | Page xvii |
| Index - 5.1.2 | LOW POPULATION ZONE | Page xvii |
| Index - 5.1.3 | SITE BOUNDARY FOR LIQUID AND GASEOUS EFFLUENTS | Page xvii |
| Index - 5.1, Figure 5.1-1 | EXCLUSION AREA | Page xvii |
| Index - 5.1, Figure 5.1-2 | LOW POPULATION ZONE | Page xvii |
| Index - 5.1, Figure 5.1-3 | SITE BOUNDARY FOR LIQUID AND GASEOUS EFFLUENTS | Page xvii |
| Index - 5.2 | CONTAINMENT | Page xvii |
| Index - 5.2.1 | CONFIGURATION | Page xvii |
| Index - 5.2.2 | DESIGN PRESSURE AND TEMPERATURE | Page xvii |
| Index - 5.4 | REACTOR COOLANT SYSTEM | Page xvii |
| Index - 5.4.1 | DESIGN PRESSURE AND TEMPERATURE | Page xvii |
| Index - 5.4.2 | VOLUME | Page xvii |
| Index - 5.5 | METEOROLOGICAL TOWER LOCATION | Page xvii |
| Index - 5.7 | COMPONENT CYCLIC OR TRANSIENT LIMIT | Page xvii |

Technical Specification Change Request
Administrative Changes To The Unit Nos. 1, 2 and 3 TS

Marked-up Unit No. 3 Technical Specification Pages

| Technical Specification Section Numbers | Title(s) of Section(s) | Affected Pg. And Amendment No. |
|---|---|---|
| Index - 6.17 | TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM | Page xix, Am. No. 188 |
| Index - 6.18 | COMPONENT CYCLIC OR TRANSIENT LIMIT | Page xix, Am. No. 188 |
| 5.1 | SITE | Page 5-1 |
| 5.1.1 | EXCLUSION AREA | Page 5-1 |
| 5.1.2 | LOW POPULATION ZONE | Page 5-1 |
| 5.1.3 | SITE BOUNDARY FOR LIQUID AND GASEOUS EFFLUENTS | Page 5-1 |
| 5.2 | CONTAINMENT | Page 5-1 |
| 5.2.1 | CONFIGURATION | Page 5-1 |
| 5.2.2 | DESIGN PRESSURE AND TEMPERATURE | Page 5-1 |
| Figure 5.1-1 | EXCLUSION AREA | Page 5-2, (Jan. 31, 1986) |
| Figure 5.1-2 | LOW POPULATION ZONE | Page 5-3, (Jan. 31, 1986) |
| Figure 5.1-3 | SITE BOUNDARY FOR LIQUID AND GASEOUS EFFLUENTS | Page 5-4, (Jan. 31, 1986) |
| 5.4 | REACTOR COOLANT SYSTEM | Page 5-5, Am. No. 81 |
| 5.4.1 | DESIGN PRESSURE AND TEMPERATURE | Page 5-5, Am. No. 81 |
| 5.4.2 | VOLUME | Page 5-5, Am. No. 81 |

Technical Specification Change Request
Administrative Changes To The Unit Nos. 1, 2 and 3 TS

Marked-up Unit No. 3 Technical Specification Pages

| Technical Specification Section Numbers | Title(s) of Section(s) | Affected Pg. And Amendment No. |
|---|---|---|
| 5.5 | METEOROLOGICAL TOWER LOCATION | Page 5-5, Am. No. 81 |
| 5.5.1 | METEOROLOGICAL TOWER LOCATION | Page 5-5, Am. No. 81 |
| 5.7 | COMPONENT CYCLIC OR TRANSIENT LIMIT | Page 5-6a, Am. No. 189 |
| 5.7.1 | COMPONENT CYCLIC OR TRANSIENT LIMIT | Page 5-6a, Am. No. 189 |
| Table 5.7-1 | COMPONENT CYCLIC OR TRANSIENT LIMITS | Page 5-7, (Jan. 31, 1986) |
| 6.1.3 | RESPONSIBILITY | Page 6-1, Am. No. 171 |
| 6.2.1.a | OFFSITE AND ONSITE ORGANIZATIONS | Page 6-1, Am. No. 171 |
| 6.2.1.d | OFFSITE AND ONSITE ORGANIZATIONS | Page 6-1, Am. No. 171 |
| 6.2.2.d | FACILITY STAFF (also Footnote) | Page 6-2, Am. No. 84 |
| Table 6.2-1 | MINIMUM SHIFT CREW COMPOSITION | Page 6-3, Am. No. 69 |
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| 6.3.1.a | FACILITY STAFF QUALIFICATIONS | Page 6-5, Am. No. 173 |
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| 6.8.6 | PROCEDURES AND PROGRAMS | Page 6-17a, Am. No. 186 |

Technical Specification Change Request
Administrative Changes To The Unit Nos. 1, 2 and 3 TS

Marked-up Unit No. 3 Technical Specification Pages

| Technical Specification Section Numbers | Title(s) of Section(s) | Affected Pg. And Amendment No. |
|---|---|---|
| 6.12.1, 6.12.1.c, 6.12.2 | HIGH RADIATION AREA | Page 6-23, Am. No. 69 |
| 6.17 | TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM (New Spec.) | Page 6-26, Am. No. 188 |
| 6.18 | COMPONENT CYCLIC OR TRANSIENT LIMITS (New Spec.) | Page 6-26, Am. No. 188 |

DESIGN FEATURES


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## 5.0 DESIGN FEATURES

### 5.1 SITE ⟸ Insert A

EXCLUSION AREA

5.1.1 The Exclusion Area shall be as shown in Figure 5.1-1.

LOW POPULATION ZONE

5.1.2 The Low Population Zone shall be as shown in Figure 5.1-2.

SITE BOUNDARY FOR LIQUID AND GASEOUS EFFLUENTS

5.1.3 The site boundary for liquid and gaseous effluents shall be as shown in Figure 5.1-3.

### 5.2 CONTAINMENT ← DELETED

CONFIGURATION

5.2.1 The containment building is a steel-lined, reinforced concrete building of cylindrical shape, with a dome roof and having the following design features:

a. Nominal inside diameter = 140 feet.

b. Nominal inside height = 201 feet, 3 inches.

c. Minimum thickness of concrete walls = 4 feet, 6 inches.

d. Minimum thickness of concrete roof = 2 feet, 6 inches.

e. Minimum thickness of concrete floor pad = 10 feet.

f. Nominal thickness of steel liner = 1/4 inch (floor), 3/8 inch (wall), and 1/2 inch (dome).

g. Net free volume = $2.26 \times 10^6$ cubic feet.

DESIGN PRESSURE AND TEMPERATURE

5.2.2 The containment building is designed and shall be maintained for a minimum internal pressure of 8 psia, a maximum internal pressure of 59.7 psia, and a temperature of 280°F.

INSERT 'A' - Page 5-1

## 5.1 SITE LOCATION

The Unit 3 Containment Building is located on the site at Millstone Point in Waterford, Connecticut. The nearest site boundary on land is 1719 feet northeast of the containment building wall (1627 feet northeast of the elevated stack), which is the minimum distance to the boundary of the exclusion area as described in 10 CFR 100.3(a). No part of the site that is closer than these distances shall be sold or leased except to Dominion Nuclear Connecticut, Inc. or its corporate affiliates for use in conjunction with normal utility operations.

JAN 31 1986

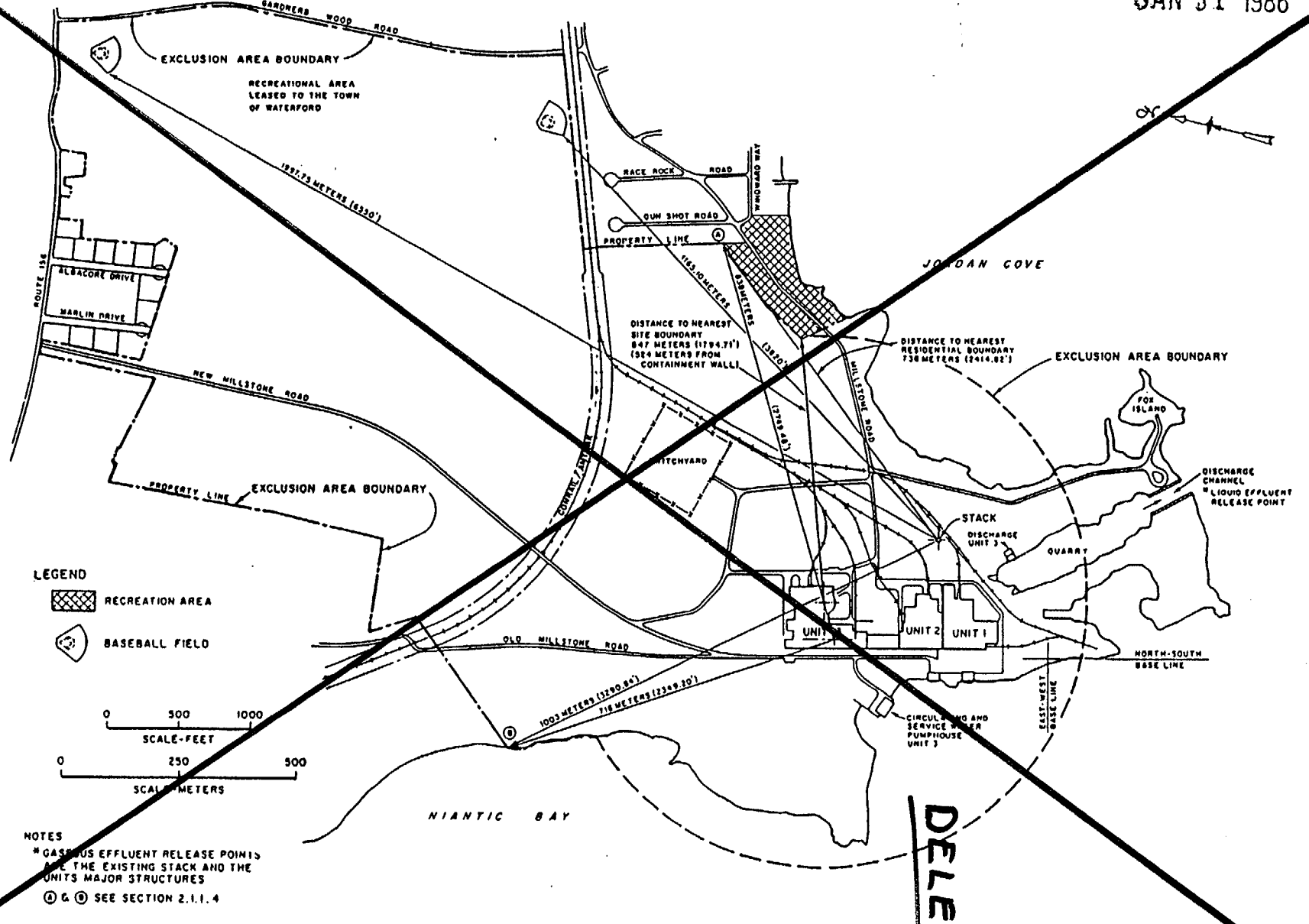


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FIGURE 5.1-1 EXCLUSION AREA

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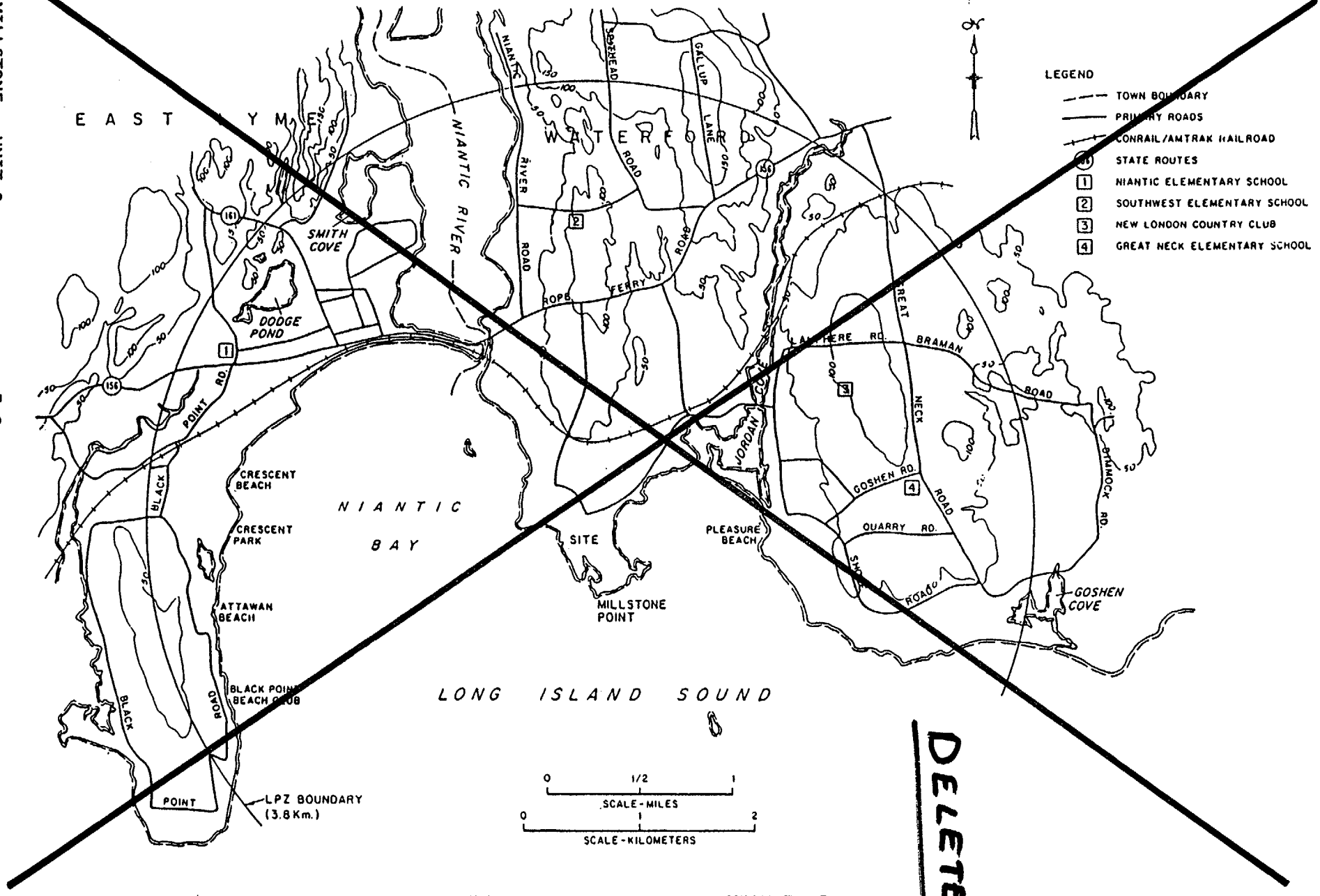


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FIGURE 5.1-2 LOW POPULATION ZONE

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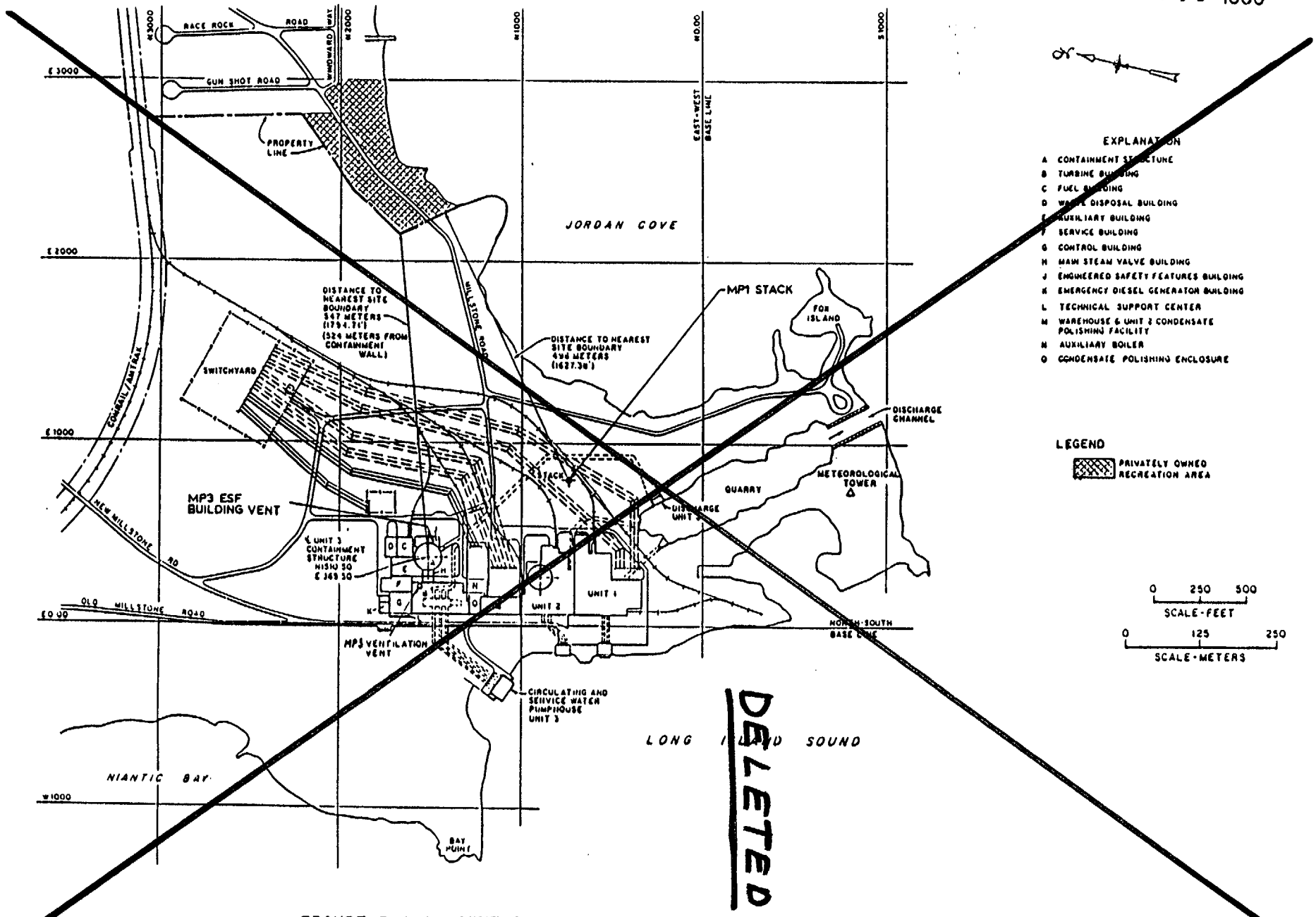


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FIGURE 5.1-3 SITE BOUNDARY FOR LIQUID AND GASEOUS EFFLUENTS

## 5.3 REACTOR CORE

### FUEL ASSEMBLIES

5.3.1 The core shall contain 193 fuel assemblies. Each fuel assembly shall consist of 264 zircaloy-4 or ZIRLO clad fuel rods with an initial composition of natural uranium dioxide or a maximum nominal enrichment of 5.0 weight percent U-235 as fuel material. Limited substitutions of zircaloy-4, ZIRLO or stainless steel filler rods for fuel rods, in accordance with NRC-approved applications of fuel rod configurations, may be used. Fuel assembly configurations shall be limited to those fuel designs that have been analyzed with applicable NRC staff-approved codes and methods, and shown by test or cycle-specific reload analyses to comply with all fuel safety design bases. Each fuel rod shall have a nominal active fuel length of 144 inches. A limited number of lead test assemblies that have not completed representative testing may be placed in nonlimiting core regions.

### CONTROL ROD ASSEMBLIES

5.3.2 The core shall contain 61 full-length control rod assemblies. The full-length control rod assemblies shall contain a nominal 142 inches of absorber material. The nominal values of absorber material shall be 95.3% hafnium and 4.5% natural zirconium or 80% silver, 15% indium, and 5% cadmium. All control rods shall be clad with stainless steel.

## 5.4 REACTOR COOLANT SYSTEM ← DELETED

### DESIGN PRESSURE AND TEMPERATURE

5.4.1 The Reactor Coolant System is designed and shall be maintained:

a. In accordance with the Code requirements specified in Section 5.2 of the FSAR, with allowance for normal degradation pursuant to the applicable Surveillance Requirements,

b. For a pressure of 2500 psia, and

c. For a temperature of 650°F, except for the pressurizer which is 680°F.

### VOLUME

5.4.2 The total water and steam volume of the Reactor Coolant System is 12,240 cubic feet at a nominal $T_{avg}$ of 587°F.

## 5.5 METEOROLOGICAL TOWER LOCATION ← DELETED

5.5.1 The meteorological tower shall be located as shown on Figure 5.1-3.

November 28, 2000
No Changes
For Information
Only

## 5.6 FUEL STORAGE

### CRITICALITY

5.6.1.1 The spent fuel storage racks are made up of 3 Regions which are designed and shall be maintained to ensure a $K_{eff}$ less than or equal to 0.95 when flooded with unborated water. The storage rack Regions are:

a. Region 1, a nominal 10.0 inch (North/South) and a nominal 10.455 inch (East/West) center to center distance, credits a fixed neutron absorber (BORAL) within the rack, and can store fuel in 2 storage configurations:

(1) With credit for fuel burnup as shown in Figure 3.9-1, fuel may be stored in a "4-OUT-OF-4" storage configuration.

(2) With credit for every 4th location blocked and empty of fuel, fuel up to 5 weight percent nominal enrichment, regardless of fuel burnup, may be stored in a "3-OUT-OF-4" storage configuration. Fuel storage in this configuration is subject to the interface restrictions specified in Figure 3.9-2.

b. Region 2, a nominal 9.017 inch center to center distance, credits a fixed neutron absorber (BORAL) within the rack, and with credit for fuel burnup as shown in Figure 3.9-3, fuel may be stored in all available Region 2 storage locations.

c. Region 3, a nominal 10.35 inch center to center distance, with credit for fuel burnup and fuel decay time as shown in Figure 3.9-4, fuel may be stored in all available Region 3 storage locations. The Boraflex contained inside these storage racks is not credited.

### DRAINAGE

5.6.2 The spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool below elevation 45 feet.

CAPACITY

5.6.3 The spent fuel storage pool contains 350 Region 1 storage locations, 673 Region 2 storage locations and 756 Region 3 storage locations, for a total of 1779 total available fuel storage locations. An additional Region 2 rack with 81 storage locations may be placed in the spent fuel pool, if needed. With this additional rack installed, the Region 2 storage capacity is 754 storage locations, for a total of 1860 total available fuel storage locations.

5.7 COMPONENT CYCLIC OR TRANSIENT LIMIT ← DELETED

5.7.1 The components identified in Table 5.7-1 are designed and shall be maintained within the cyclic or transient limits of Table 5.7-1.

TABLE 5.7-1

COMPONENT CYCLIC OR TRANSIENT LIMITS

| COMPONENT | CYCLIC OR TRANSIENT LIMIT | DESIGN CYCLE OR TRANSIENT |
|---|---|---|
| Reactor Coolant System | 200 heatup cycles at ≤ 100°F/h and 200 cooldown cycles at ≤ 100°F/h. | Heatup cycle - $T_{avg}$ from ≤ 200°F to ≥ 550°F. Cooldown cycle - $T_{avg}$ from ≥ 550°F to ≤ 200°F. |
| | 200 pressurizer cooldown cycles at ≤ 200°F/h. | Pressurizer cooldown cycle temperatures from ≥ 650°F to ≤ 200°F. |
| | 80 loss of load cycles, without immediate Turbine or reactor trip. | > 15% of RATED THERMAL POWER to 0% of RATED THERMAL POWER. |
| | 40 cycles of loss-of-offsite A.C. electrical power. | Loss-of-offsite A.C. electrical ESF Electrical System. |
| | 80 cycles of loss of flow in one reactor coolant loop. | Loss of only one reactor coolant pump. |
| | 400 Reactor trip cycles. | 100% to 0% of RATED THERMAL POWER. |
| | 10 auxiliary spray actuation cycles. | Spray water temperature differential > 320°F. |
| | 200 leak tests. | Pressurized to ≥ 2500 psia. |
| | 10 hydrostatic pressure tests. | Pressurized to ≥ 3125 psia. |
| Secondary Coolant System | 1 steam line break. | Break in a > 6-inch steam line. |
| | 10 hydrostatic pressure tests. | Pressurized to ≥ 1350 psig. |

DELETE

## 6.1 RESPONSIBILITY

6.1.1 The designated officer shall be responsible for overall operation of the Millstone Station Site and shall delegate in writing the succession to this responsibility. The designated manager shall be responsible for overall Unit safe operation and shall delegate in writing the succession to this responsibility.

6.1.2 The Shift Manager shall be responsible for the control room command function.

6.1.3 Unless otherwise defined, the technical specification titles for members of the staff are generic titles. Unit specific titles for the functions and responsibilities associated with these generic titles are identified in the Quality Assurance Topical Report.

## 6.2 ORGANIZATION

### 6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

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

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

b. The designated manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. The designated officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

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

### 6.2.2 FACILITY STAFF

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

FACILITY STAFF (Continued)

b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room;

c. At least two licensed Operators shall be present in the control room during reactor startup, scheduled reactor shutdown and during recovery from reactor trips.

d. A Health Physics Technician* shall be on site when fuel is in the reactor; radiation protection

e. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or licensed Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;

f. Deleted

g. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions. These procedures should follow the general guidance of the NRC Policy Statement on working hours (Generic Letter No. 82-12).

radiation protection

*The Health Physics Technician composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

August 28, 1992

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION

| POSITION | NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION | |
|---|---|---|
| | MODE 1, 2, 3, or 4 | MODE 5 or 6 |
| SS SM | 1 | 1 |
| SRO | 1 | None |
| RO | 2 | 1 |
| PEO | 2 | 1 |
| STA | 1* | None |

Manager

SM SS - Shift Supervisor with a Senior Operator license on Unit 3

SRO - Individual with a Senior Operator license on Unit 3

RO - Individual with an Operator license on Unit 3

PEO - Plant Equipment Operator (Non-licensed)

STA - Shift Technical Advisor

The shift crew composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewmember being late or absent.

Manager

During any absence of the Shift Supervisor from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Shift Supervisor from the control room while the unit is in MODE 5 or 6, an individual with a valid Senior Operator license or Operator license shall be designated to assume the control room command function.

*The STA position may be filled by an on-shift Senior Reactor Operator only if that Senior Reactor Operator meets the Shift Technical Advisor qualifications of the Commission Policy Statement on Engineering Expertise on Shift.

6.2.3 Deleted.

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

Manager

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for:

a. If the Operations Manager does not hold a senior reactor operator license for Millstone Unit No. 3, then the Operations Manager shall have held a senior reactor operator license at a pressurized water reactor, and the Assistant Operations Manager shall hold a senior reactor operator license for Millstone Unit No. 3.

b. The Health Physics Manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1, May 1977.

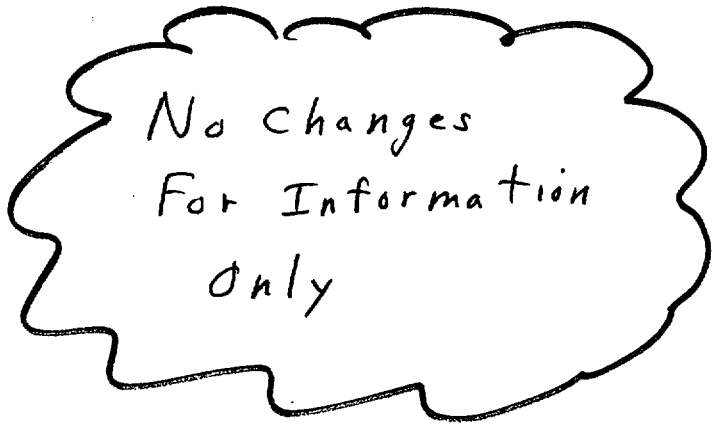
radiation protection

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.59 shall be maintained.

6.4.2 Deleted.

6.5 Deleted.

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No Changes For Information Only, August 13, 1999

6.6 Deleted.

6.7 Deleted.

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

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

b. The applicable procedures required to implement the requirements of NUREG-0737 and supplements thereto;

c. Refueling operations;

d. Surveillance activities of safety related equipment;

e. Not used.

f. Not used.

g. Fire Protection Program implementation;

h. Quality controls for effluent monitoring, using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974; and

i. Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMODCM) implementation except for Section I.E, Radiological Environmental Monitoring.

6.8.2 a. The designated manager or designated officer or designated senior officer may designate specific procedures and programs, or classes of procedures and programs to be reviewed in accordance with the Quality Assurance Program Topical Report.

b. Procedures and programs listed in Specification 6.8.1, and changes thereto, shall be approved by the designated manager or designated officer or by cognizant Managers or Directors who are designated as the Approval Authority by designated manager or designated officer as specified in administrative procedures. The Approval Authority for each procedure and program or class of procedure and program shall be specified in administrative procedures.

c. Each procedure of Specification 6.8.1, and changes thereto, shall be reviewed and approved in accordance with the Quality Assurance Program Topical Report, prior to implementation. Each procedure of Specification 6.8.1 shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of Specification 6.8.1 may be made provided:

a. The intent of the original procedure is not altered;

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operator license on the unit affected; and

c. The change is documented, reviewed and approved in accordance with the Quality Assurance Program Topical Report within 14 days of implementation.

PROCEDURES AND PROGRAMS (Continued)

organization responsible for the REMP

6.8.5 Written procedures shall be established, implemented and maintained covering Section I.E, Radiological Environmental Monitoring, of the REMODCM. (REMP)

6.8.6 All procedures and procedure changes required for the Radiological Environmental Monitoring Program of Specification 6.8.5 above shall be reviewed by an individual (other than the author) from the Radiological Assessment Branch or the Production Operation Services Laboratory (POSL) and approved by appropriate supervision.

Temporary changes may be made provided the intent of the original procedure is not altered and the change is documented and reviewed by an individual (other than the author) from the Radiological Assessment Branch or the POSL within 14 days of implementation.

6.9 REPORTING REQUIREMENTS

organization responsible for the REMP

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, one copy to the Regional Administrator, Region I, and one copy to the NRC Resident Inspector, unless otherwise noted.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following: (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit.

The Startup Report shall address each of the tests identified in the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.12 HIGH RADIATION AREA

6.12.1 Pursuant to paragraph 20.203(c)(5) of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph 20.203(c),each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., Health Physics Technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area; or

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or

c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Health Physics Manager in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the shift supervisor on duty and/or health physics supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mR/h that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

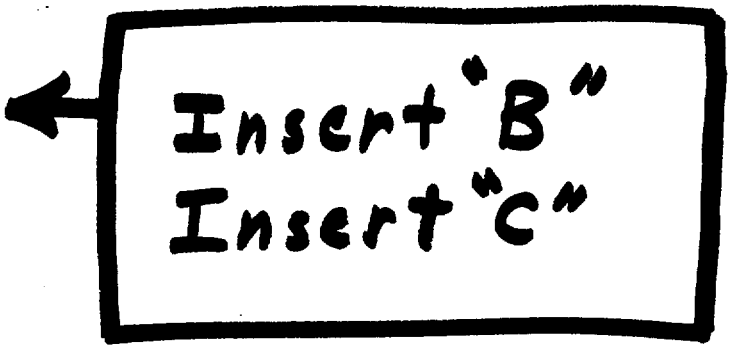
6.16 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provided (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the REMODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

a. Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the REMODCM.

b. A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and

c. Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.



INSERT 'B' - Page 6-26

6.17 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:

1. A change in the TS incorporated in the license or

2. A change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.

d. Proposed changes that meet the criteria of Specification 6.17.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

INSERT 'C' - Page 6-26

## 6.18 COMPONENT CYCLIC OR TRANSIENT LIMIT

This program provides controls to track the FSAR, Section 3.9N, cyclic and transient occurrences to ensure that components are maintained within the design limits.

Docket Nos. 50-245
50-336
50-423
B18415

Attachment 6

Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3

Technical Specification Change Request
Administrative and Editorial Changes to the Unit Nos. 1, 2 and 3
Technical Specifications
Retyped Unit No. 1 Permanently Defueled Technical Specifications Pages

# 5.0 ADMINISTRATIVE CONTROLS

## 5.1 Responsibility

5.1.1 The designated officer shall be responsible for overall operation of the Millstone Station Site and shall delegate, in writing, the succession to this responsibility. The designated manager shall be responsible for overall Unit safe operation and shall delegate in writing the succession of this responsibility.

5.1.2 The Shift Manager shall be responsible for the control room command function.

5.1.3 Unless otherwise defined, the technical specification titles for members of the staff are generic titles. Unit-specific titles for the functions and responsibilities associated with these generic titles are identified in the Quality Assurance Program Topical Report.

# 5.0 ADMINISTRATIVE CONTROLS

## 5.2 Organization

### 5.2.1 Onsite And Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safe storage of irradiated fuel.

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

b. The designated manager shall be responsible for overall unit safe operation and shall have control over those onsite activities and resources necessary for maintenance and storage of irradiated fuel in a safe condition.

c. The designated officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to ensure the safe storage of irradiated fuel.

d. The individuals who train the CERTIFIED FUEL HANDLERS and those who carry out radiation protection functions or perform quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their ability to perform their assigned functions.

(continued)

5.0 ADMINISTRATIVE CONTROLS

## 5.3 Facility Staff Qualifications

5.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for:

5.3.1.1 The operations manager or assistant operations manager shall be a CERTIFIED FUEL HANDLER.

5.3.1.2 The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1, May 1977.

5.0 ADMINISTRATIVE CONTROLS

5.5 Procedures

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

a. The procedures applicable to the safe storage of irradiated fuel recommended in Appendix "A" of Regulatory Guide 1.33, February 1978;

b. Fire Protection Program implementation;

c. Cold Weather Operations;

d. Quality Controls for effluent monitoring, using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974;

e. Liquid and gaseous radioactive effluent discharges from the unit for all operations involving offsite releases of radioactive effluents. These procedures shall specify the use of appropriate waste treatment utilizing the guidance provided in the REMODCM;

f. Fuel handling operations;

g. All programs specified in Specification 5.6, except for Section I.E, Radiological Environmental Monitoring of REMODCM, which is performed in accordance with Specifications 5.5.6 and 5.5.7.

5.5.2 The designated manager, designated officer, or designated senior officer may designate specific procedures and programs, or classes of procedures and programs to be reviewed in accordance with the Station Qualified Reviewer Program in lieu of review by the SORC. The review per the SORC or Station Qualified Reviewer Program shall be in accordance with the Quality Assurance Program Topical Report.

5.5.3 Procedures listed in Specification 5.5.1, and changes thereto, shall be approved by the designated manager, or designated officer or by cognizant managers or directors who are designated as the Approval Authority by the designated manager, or designated officer as specified in administrative procedures. The Approval Authority for each procedure and program or class of procedure and program shall be specified in administrative procedures.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.5 Procedures (continued)

5.5.4 Each procedure of Specification 5.5.1, and changes thereto, shall be reviewed by the SORC and shall be approved by the designated manager or designated officer, or be reviewed and approved in accordance with the Station Qualified Reviewer Program prior to implementation. Each procedure of Specification 5.5.1 shall be reviewed periodically as set forth in administrative procedures.

5.5.5 Temporary changes to procedures of Specification 5.5.1 above may be made provided:

a. the intent of the original procedure is not altered;

b. the change is approved by two members of the plant management staff, at least one of whom is a CERTIFIED FUEL HANDLER;

c. the change is documented, reviewed by the SORC or the Station Qualified Reviewer Program, as applicable, and approved by the designated manager, designated officer, or the Station Qualified Reviewer Program department manager within 14 days of implementation.

5.5.6 All procedures and procedure changes required for the Radiological Environmental Monitoring Program (REMP) of Specification 5.6.1 shall be reviewed by an individual (other than the author) from the organization responsible for the REMP and approved by appropriate supervision.

5.5.7 Temporary changes may be made for the Radiological Environmental Monitoring Program provided the intent of the original procedure is not altered and the change is documented and reviewed by an individual (other than the author) from the organization responsible for the REMP within 14 days of implementation.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.6 Programs and Manuals

5.6.2 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications

a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:

1. A change in the TS incorporated in the license; or

2. A change to the updated FSAR or Bases that requires NRC approval pursuant to 10CFR50.59.

c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.

d. Proposed changes that meet the criteria of Specification 5.6.2b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10CFR50.71(e).

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.8 High Radiation Area

5.8 High Radiation Area

5.8.1 Pursuant to 10CFR Part 20.1601(c), in lieu of the requirements of 10CFR Part 20.1601(a), each high radiation area as defined in 10 CFR Part 20 shall be barricaded and conspicuously posted as a high radiation area, and entrance thereto shall be controlled by requiring issuance of a radiation work permit or equivalent. Individuals trained and qualified in radiation protection procedures (e.g., a radiation protection technician) or personnel continuously escorted by such individuals may be exempted from this RWP requirement while performing their assigned duties in high radiation areas where radiation doses could be received that are equal to or less than 1 rem in 1 hour (measured at 30 centimeters from any source of radiation) provided they are otherwise following plant radiation protection procedures, or a general radiation protection RWP, for entry into such high radiation areas.

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

a. A radiation monitoring device that continuously indicates the radiation dose rate in the area,

b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rates in the area have been determined and personnel have been made knowledgeable of them,

c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device. This individual is responsible for providing positive radiation protection control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation protection procedures or the applicable RWP.

(continued)

5.0 ADMINISTRATIVE CONTROLS

5.8 High Radiation Area

5.8 High Radiation Area (continued)

5.8.2 In addition to the requirements of Specification 5.8.1, areas that are accessible to personnel and that have radiation levels greater than 1.0 rem (but less than 500 rads at 1 meter) in 1 hour at 30 cm from the radiation source, or from any surface penetrated by the radiation, shall be provided with locked or continuously guarded doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the appropriate supervisor on duty or radiation protection supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP that specifies the dose rates in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification on the RWP, direct or remote continuous surveillance (such as closed circuit TV cameras) may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

5.8.3 Individual high radiation areas that are accessible to personnel, that could result in radiation doses greater than 1.0 rem in 1 hour, and that are within large areas where no enclosure exists to enable locking and where no enclosure can be reasonably constructed around the individual area shall be barricaded and conspicuously posted. A flashing light shall be activated whenever the dose rate in such an area exceeds or is expected to exceed 1.0 rem in 1 hour at 30 cm from the radiation source or from any surface penetrated by the radiation.

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Attachment 7

Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3

Technical Specification Change Request
Administrative and Editorial Changes to the Unit Nos. 1, 2 and 3
Technical Specifications
Retyped Unit No. 2 Technical Specifications Pages

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SURVEILLANCE REQUIREMENTS

4.7.5.1.1 The water level shall be determined to be below plant grade at least once per hour when the eye of a hurricane is within 150 miles of the facility.

4.7.5.1.2 The above specified meteorological conditions shall be determined at least once per 2 hours when a hurricane eye is within 150 miles of the facility. The meteorological conditions shall be determined from weather service forecasts and/or from the site meteorological instrumentation.

## 5.0 DESIGN FEATURES

### 5.1 SITE LOCATION

The Unit 2 Containment Building is located on the site at Millstone Point in Waterford, Connecticut. The nearest site boundary on land is 2034 feet northeast of the containment building wall (1627 feet northeast of the elevated stack), which is the minimum distance to the boundary of the exclusion area as described in 10 CFR 100.3(a). No part of the site that is closer than these distances shall be sold or leased except to Dominion Nuclear Connecticut, Inc. or its corporate affiliates for use in conjunction with normal utility operations.

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## 5.3 REACTOR CORE

### FUEL ASSEMBLIES

5.3.1 The reactor core shall contain 217 fuel assemblies with each fuel assembly containing 176 rods. Reload fuel shall be similar in physical design to the initial core loading and shall have a maximum enrichment of 4.5 weight percent of U-235.

### CONTROL ELEMENT ASSEMBLIES

5.3.2 The reactor core shall contain 73 full length and no part length control element assemblies. The control element assemblies shall be designed and maintained in accordance with the design provisions contained in Section 3.0 of the FSAR with allowance for normal degradation pursuant to the applicable Surveillance Requirements.

## 5.4 DELETED

## 5.5 DELETED

## 5.6 FUEL STORAGE

### CRITICALITY

5.6.1 a) The new fuel (dry) storage racks are designed and shall be maintained with sufficient center to center distance between assemblies to ensure a $k_{eff} \leq .95$. The maximum nominal fuel enrichment to be stored in these racks is 4.50 weight percent of U-235.

b) Region A of the spent fuel storage pool is designed and shall be maintained with a nominal 9.8 inch center to center distance between storage locations to ensure a $K_{eff} \leq .95$ with the storage pool filled with unborated water. Fuel assemblies stored in this region must comply with Figure 3.9-4 to ensure that the design burnup has been sustained.

c) Region B of the spent fuel storage pool is designed and shall be maintained with a nominal 9.8 inch center-to-center distance between storage locations to ensure $K_{eff} \leq .95$ with a storage pool filled with unborated water. Fuel assemblies stored in this region may have a maximum nominal enrichment of 4.5 weight percent U-235. Fuel assemblies stored in this region are placed in a 3 out of 4 STORAGE PATTERN for reactivity control.

d) Region C of the spent fuel storage pool is designed and shall be maintained with a 9.0 inch center to center distance between storage locations to ensure a $K_{eff} \leq .95$ with the storage pool filled with unborated water. Fuel assemblies stored in this region must comply with Figures 3.9-1a or 3.9-1b to ensure that the design burn-up has been sustained. Additionally, fuel assemblies utilizing Figure 3.9-1b require that borated stainless steel poison pins are installed in the fuel assembly's center guide tube and in two diagonally opposite guide tubes. The poison pins are solid 0.87 inch O.D. borated stainless steel, with a boron content of 2 weight percent boron.

e) Region C of the spent fuel storage pool is designed to permit storage of consolidated fuel and ensure a $K_{eff} \leq 0.95$. The contents of consolidated fuel storage boxes to be stored in this region must comply with Figure 3.9-3.

5.7 DELETED

5.8 DELETED

5.9 DELETED

## 6.1 RESPONSIBILITY

6.1.1 The designated officer shall be responsible for overall operation of the Millstone Station Site and shall delegate in writing the succession to this responsibility. The designated manager shall be responsible for overall Unit safe operation and shall delegate in writing the succession to this responsibility.

6.1.2 The Shift Manager shall be responsible for the control room command function.

6.1.3 Unless otherwise defined, the technical specification titles for members of the staff are generic titles. Unit specific titles for the functions and responsibilities associated with these generic titles are identified in the Quality Assurance Program Topical Report.

## 6.2 ORGANIZATION

### 6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

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

a. Lines of authority, responsibility, and communication shall be established and defined for the higher management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Quality Assurance Program Topical Report.

b. The designated manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. The designated officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operation, maintaining, and providing technical support to the plant to ensure nuclear safety.

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

### 6.2.2 FACILITY STAFF

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

FACILITY STAFF (CONTINUED)

d. A radiation protection technician shall be on site when fuel is in the reactor. (Table 6.2-1)

e. ALL CORE ALTERATIONS after the initial fuel loading shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.

f. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions. These procedures should follow the general guidance of the NRC Policy Statement on working hours (Generic Letter No. 82-12).

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for:

a. If the operations manager does not hold a senior reactor operator license for Millstone Unit No. 2, then the operations manager shall have held a senior reactor operator license at a Pressurized Water Reactor and an individual serving in the capacity of the assistant operations manager shall hold a senior reactor operator license for Millstone Unit No. 2.

b. The Shift Technical Advisor (STA) who shall meet the requirements of Specification 6.3.1.b.1 or 6.3.1.b.2.

1. Dual-role individual: Must hold a senior reactor operator's license at Millstone Unit No. 2, meet the STA training criteria of NUREG-0737, Item I.A.1.1, and meet one of the following educational alternatives:

a. Bachelor's degree in engineering from an accredited institution;

b. Professional Engineer's license obtained by the successful completion of the PE examination;

c. Bachelor's degree in engineering technology from an accredited institution, including course work in the physical, mathematical, or engineering sciences;

d. Bachelor's degree in a physical science from an accredited institution, including course work in the physical, mathematical, or engineering sciences;

e. Successful completion of the Memphis State University (MSU) STA program. (Note: This alternative is only acceptable for individuals who have completed the program prior to December 31, 1986); or

f. Successful completion of the Thames Valley State Technical College associate's degree in Nuclear Engineering Technology program, provided that the individual was enrolled in the program by October 1, 1987.

2. Dedicated STA: Must meet the STA training criteria of NUREG-0737, Item I.A.1.1, and have received specific training in plant design, and response and analysis of the plant for transients and accidents.

c. The radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1, May 1977.

TABLE 6.2-1[3]

MINIMUM SHIFT-CREW COMPOSITION[2]

| LICENSE CATEGORY | APPLICABLE MODES 1, 2, 3 & 4 | 5 & 6 |
|---|---|---|
| Senior Reactor Operator | 2 | 1[1] |
| Reactor Operator | 2 | 1 |
| Non-Licensed Operator | 2 | 1 |
| Shift Technical Advisor | 1[4] | None Required |

(1) Does not include the licensed Senior Reactor or Senior Reactor Operator Limited to Fuel Handling individual supervision CORE ALTERATIONS after the initial fuel loading.

(2) The above shift crew composition and the qualified radiation protection technician of Section 6.2.2 may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided expeditious actions are taken to fill the required position.

(3) Requirements for minimum number of licensed operators on shift during operation in modes other than cold shutdown or refueling are contained in 10CFR50.54(m).

(4) The Shift Technical Advisor position can be filled by either of the two Senior Reactor Operators (a dual-role individual), if he meets the requirements of Specification 6.3.1.b.1.

f. Fire Protection Program implementation.

g. Quality Control for effluent monitoring using the guidance in Regulatory Guide 1.21 Rev. 1, June 1974.

h. Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMODCM) implementation, except for Section I.E., Radiological Environmental Monitoring.

6.8.2 a. The designated manager or designated officer or designated senior officer may designate specific procedures and programs, or classes of procedures and programs to be reviewed in accordance with the Quality Assurance Program Topical Report.

b. Procedures and programs listed in Specification 6.8.1, and changes thereto, shall be approved by the designated manager or designated officer or by cognizant managers or directors who are designated as the Approval Authority by the designated manager or designated officer, as specified in administrative procedures. The Approval Authority for each procedure and program or class of procedure and program shall be specified in administrative procedures.

c. Each procedure of Specification 6.8.1, and changes thereto, shall be reviewed and approved in accordance with the Quality Assurance Program Topical Report, prior to implementation. Each procedure of Specification 6.8.1 shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.

c. The change is documented, reviewed and approved in accordance with the Quality Assurance Program Topical Report within 14 days of implementation.

6.8.4 Written procedures shall be established, implemented and maintained covering Section I.E, Radiological Environmental Monitoring, of the REMODCM.

6.8.5 All procedures and procedure changes required for the Radiological Environmental Monitoring Program (REMP) of 6.8.4 above shall be reviewed by an individual (other than the author) from the organization responsible for the REMP and approved by appropriate supervision.

Temporary changes may be made provided the intent of the original procedure is not altered and the change is documented and reviewed by an individual (other than the author) from the organization responsible for the REMP within 14 days of implementation.

## 6.9 REPORTING REQUIREMENTS

### Routine Reports

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, one copy to the Regional Administrator, Region I, and one copy to the NRC Resident Inspector, unless otherwise noted.

### Startup Report

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

ANNUAL REPORTS[1]

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5 Reports required on an annual basis shall include:

a. A tabulation, on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man-rem exposure according to work and job functions,[2] e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

b. The complete results of steam generator tube inservice inspections performed during the report period (reference Specification 4.4.5.1.5.b).

c. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

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1 A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

2 This tabulation supplements the requirements of 20.407 of 10 CFR Part 20.

## 6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

## 6.12 HIGH RADIATION AREA

6.12.1 Pursuant to paragraph 20.203(c)(5) of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph 20.203(c), each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., radiation protection technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area; or

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or

c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the radiation protection manager in the RWP.

6.12 HIGH RADIATION AREA (CONT.)

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Manager on duty and/or radiation protection supervision. Doors shall remain locked except during period of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed-circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For individual high radiation areas accessible to personnel with radiation levels greater than 1000 mR/h that are located within large areas where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

6.13 SYSTEMS INTEGRITY

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

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and

2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

6.14 IODINE MONITORING

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

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

b. A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and

c. Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

6.22 TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM

This program provides a means for processing changes to the Bases of these Technical Specifications.

a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:

1. A change in the TS incorporated in the license or

2. A change in the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.

d. Proposed changes that meet the criteria of Specification 6.22.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

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Attachment 8

Millstone Nuclear Power Station, Unit Nos. 1, 2 and 3

Technical Specification Change Request
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## 5.1 SITE LOCATION

The Unit 3 Containment Building is located on the site at Millstone Point in Waterford, Connecticut. The nearest site boundary on land is 1719 feet northeast of the containment building wall (1627 feet northeast of the elevated stack), which is the minimum distance to the boundary of the exclusion area as described in 10 CFR 100.3(a). No part of the site that is closer than these distances shall be sold or leased except to Dominion Nuclear Connecticut, Inc. or its corporate affiliates for use in conjunction with normal utility operations.

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## 5.3 REACTOR CORE

### FUEL ASSEMBLIES

5.3.1 The core shall contain 193 fuel assemblies. Each fuel assembly shall consist of 264 zircaloy-4 or ZIRLO clad fuel rods with an initial composition of natural uranium dioxide or a maximum nominal enrichment of 5.0 weight percent U-235 as fuel material. Limited substitutions of zircaloy-4, ZIRLO or stainless steel filler rods for fuel rods, in accordance with NRC-approved applications of fuel rod configurations, may be used. Fuel assembly configurations shall be limited to those fuel designs that have been analyzed with applicable NRC staff-approved codes and methods, and shown by test or cycle-specific reload analyses to comply with all fuel safety design bases. Each fuel rod shall have a nominal active fuel length of 144 inches. A limited number of lead test assemblies that have not completed representative testing may be placed in nonlimiting core regions.

### CONTROL ROD ASSEMBLIES

5.3.2 The core shall contain 61 full-length control rod assemblies. The full-length control rod assemblies shall contain a nominal 142 inches of absorber material. The nominal values of absorber material shall be 95.3% hafnium and 4.5% natural zirconium or 80% silver, 15% indium, and 5% cadmium. All control rods shall be clad with stainless steel.

## 5.4 DELETED

## 5.5 DELETED

CAPACITY

5.6.3 The spent fuel storage pool contains 350 Region 1 storage locations, 673 Region 2 storage locations and 756 Region 3 storage locations, for a total of 1779 total available fuel storage locations. An additional Region 2 rack with 81 storage locations may be placed in the spent fuel pool, if needed. With this additional rack installed, the Region 2 storage capacity is 754 storage locations, for a total of 1860 total available fuel storage locations.

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## 6.1 RESPONSIBILITY

6.1.1 The designated officer shall be responsible for overall operation of the Millstone Station Site and shall delegate in writing the succession to this responsibility. The designated manager shall be responsible for overall Unit safe operation and shall delegate in writing the succession to this responsibility.

6.1.2 The Shift Manager shall be responsible for the control room command function.

6.1.3 Unless otherwise defined, the technical specification titles for members of the staff are generic titles. Unit specific titles for the functions and responsibilities associated with these generic titles are identified in the Quality Assurance Program Topical Report.

## 6.2 ORGANIZATION

### 6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

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

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

b. The designated manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. The designated officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

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

### 6.2.2 FACILITY STAFF

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

FACILITY STAFF (Continued)

b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room;

c. At least two licensed Operators shall be present in the control room during reactor startup, scheduled reactor shutdown and during recovery from reactor trips.

d. A radiation protection technician* shall be on site when fuel is in the reactor;

e. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or licensed Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;

f. Deleted

g. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions. These procedures should follow the general guidance of the NRC Policy Statement on working hours (Generic Letter No. 82-12).

*The radiation protection technician composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

## TABLE 6.2-1

## MINIMUM SHIFT CREW COMPOSITION

| POSITION | NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION | |
|---|---|---|
| | MODE 1, 2, 3, or 4 | MODE 5 or 6 |
| SM | 1 | 1 |
| SRO | 1 | None |
| RO | 2 | 1 |
| PEO | 2 | 1 |
| STA | 1* | None |

SM - Shift Manager with a Senior Operator license on Unit 3
SRO - Individual with a Senior Operator license on Unit 3
RO - Individual with an Operator license on Unit 3
PEO - Plant Equipment Operator (Non-licensed)
STA - Shift Technical Advisor

The shift crew composition may be one less than the minimum requirements of Table 6.2-1 for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewmember being late or absent.

During any absence of the Shift Manager from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with a valid Senior Operator license shall be designated to assume the control room command function. During any absence of the Shift Manager from the control room while the unit is in MODE 5 or 6, an individual with a valid Senior Operator license or Operator license shall be designated to assume the control room command function.

*The STA position may be filled by an on-shift Senior Reactor Operator only if that Senior Reactor Operator meets the Shift Technical Advisor qualifications of the Commission Policy Statement on Engineering Expertise on Shift.

6.2.3 Deleted.

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4.1 The Shift Technical Advisor shall provide advisory technical support to the Shift Manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

## 6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for:

a. If the operations manager does not hold a senior reactor operator license for Millstone Unit No. 3, then the operations manager shall have held a senior reactor operator license at a pressurized water reactor, and the assistant operations manager shall hold a senior reactor operator license for Millstone Unit No. 3.

b. The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, Revision 1, May 1977.

## 6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff that meets or exceeds the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.59 shall be maintained.

6.4.2 Deleted.

6.5 Deleted.

f. Not used.

g. Fire Protection Program implementation;

h. Quality controls for effluent monitoring, using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974; and

i. Radiological Effluent Monitoring and Offsite Dose Calculation Manual (REMODCM) implementation except for Section I.E, Radiological Environmental Monitoring.

6.8.2 a. The designated manager or designated officer or designated senior officer may designate specific procedures and programs, or classes of procedures and programs to be reviewed in accordance with the Quality Assurance Program Topical Report.

b. Procedures and programs listed in Specification 6.8.1, and changes thereto, shall be approved by the designated manager or designated officer or by cognizant managers or directors who are designated as the Approval Authority by designated manager or designated officer as specified in administrative procedures. The Approval Authority for each procedure and program or class of procedure and program shall be specified in administrative procedures.

c. Each procedure of Specification 6.8.1, and changes thereto, shall be reviewed and approved in accordance with the Quality Assurance Program Topical Report, prior to implementation. Each procedure of Specification 6.8.1 shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of Specification 6.8.1 may be made provided:

a. The intent of the original procedure is not altered;

b. The change is approved by two members of the plant management staff, at least one of whom holds a Senior Operator license on the unit affected; and

c. The change is documented, reviewed and approved in accordance with the Quality Assurance Program Topical Report within 14 days of implementation.

PROCEDURES AND PROGRAMS (Continued)

6.8.5 Written procedures shall be established, implemented and maintained covering Section I.E, Radiological Environmental Monitoring, of the REMODCM.

6.8.6 All procedures and procedure changes required for the Radiological Environmental Monitoring Program (REMP) of Specification 6.8.5 above shall be reviewed by an individual (other than the author) from the organization responsible for the REMP and approved by appropriate supervision.

Temporary changes may be made provided the intent of the original procedure is not altered and the change is documented and reviewed by an individual (other than the author) from the organization responsible for the REMP within 14 days of implementation.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, one copy to the Regional Administrator, Region I, and one copy to the NRC Resident Inspector, unless otherwise noted.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following: (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit.

The Startup Report shall address each of the tests identified in the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

## 6.12 HIGH RADIATION AREA

6.12.1 Pursuant to paragraph 20.203(c)(5) of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph 20.203(c),each high radiation area, as defined in 10 CFR Part 20, in which the intensity of radiation is equal to or less than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., radiation protection technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates equal to or less than 1000 mR/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area; or

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them; or

c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the radiation protection manager in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to personnel with radiation levels greater than 1000 mR/h at 45 cm (18 in.) from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under the administrative control of the Shift Manager on duty and/or radiation protection supervision. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For individual high radiation areas accessible to personnel with radiation levels of greater than 1000 mR/h that are located within large areas, such as PWR containment, where no enclosure exists for purposes of locking, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

6.16 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provided (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the REMODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

a. Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the REMODCM.

b. A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and

c. Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

6.17 TECHNICAL SPECIFICATIONS (TS) BASES CONTROL PROGRAM

This program provides a means for processing changes to the Bases of these Technical Specifications.

a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:

1. A change in the TS incorporated in the license or

2. A change to updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.

d. Proposed changes that meet the criteria of Specification 6.17.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

6.18 COMPONENT CYCLIC OR TRANSIENT LIMIT

This program provides controls to track the FSAR, Section 3.9N, cyclic and transient occurrences to ensure that components are maintained within the design limits.