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1CAN030201

March 13, 2002

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

SUBJECT: Arkansas Nuclear One, Unit 1
Docket No. 50-313
License Amendment Request
Proposed Changes to Support Implementation of ANO-1 Improved
Technical Specifications (ITS)

REFERENCES: Letter Dated October 29, 2001 (1CNA100102), ITS Amendment 215

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests the following amendment for Arkansas Nuclear One, Unit 1 (ANO-1). Since the NRC approval of the ANO-1 conversion to ITS in October 2001, a detailed review has been performed of the Amendment 215 ITS package. A few errors were found during the review and corrections are proposed via this submittal. It is considered unusual given the size of Amendment 215 that less than 30 errors, largely administrative in nature, were identified. The few proposed changes that are not administrative, are otherwise limited in scope and should require little, if any, technical review by the NRC Staff. These changes include 1) requiring three non-licensed operators in Modes 1, 2, 3, and 4 instead of the two currently approved in the ITS, 2) permitting the Radiological Controls Program limitations to be governed by 10 CFR 20 (prior to revision), Appendix B, Table II, Columns 1 and 2 (gaseous and liquid effluents, respectively) as had previously been approved for ANO by the NRC, and 3) reinstating Required Action A.1 in LCO 3.8.8 Inverters – Shutdown, which was inadvertently omitted. In order to allow both the NRC and ANO to begin with a matching copy of ITS upon implementation, a bases change is also proposed for the Control Room Emergency Ventilation System that acts to clarify automatic isolation requirements when in the emergency recirculation mode of operation.

Mark-ups of the current ANO-1 Technical Specification pages are not included in this submittal since the proposed changes, once approved, will be implemented in conjunction with the ANO-1 ITS implementation schedule. Therefore, the proposed changes will not be considered active until ITS is implemented and the CTS (current technical specifications) are deleted.

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The proposed changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that these changes involve no significant hazards considerations. The bases for these determinations are included in the attached submittal.

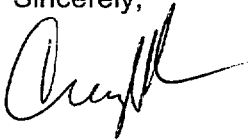
The proposed changes do not include any new commitments.

Entergy requests approval of the proposed amendment by June 1, 2002. This approval date is necessary because one or more of the enclosed proposed changes are required to be implemented in conjunction with the ANO-1 conversion to ITS, currently scheduled to occur on July 8, 2002. Once approved, the amendment shall be implemented in conjunction with the ANO-1 conversion to ITS. Although this request is neither exigent nor emergency, your prompt review is requested.

If you have any questions or require additional information, please contact David Bice at 479-858-5338.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 13, 2002.

Sincerely,

A handwritten signature in black ink, appearing to read 'CGA/dbb', is written over the 'Sincerely,' text.

CGA/dbb

Attachments:

1. Analysis of Proposed Technical Specification Change
2. Proposed Technical Specification Changes (mark-up)
3. Proposed Technical Specification Bases Pages (mark-up)

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Attachment 1

1CAN030201

Analysis of Proposed Technical Specification Change

1.0 DESCRIPTION

This letter is a request to amend Operating License DPR-51 for Arkansas Nuclear One, Unit 1 (ANO-1).

The proposed changes will revise the Operating License to correct several administrative errors and make limited-scope revisions to three specifications. In addition, one non-administrative bases change is included within this submittal. The proposed changes were identified following a detailed review of Amendment 215, which approved the ANO-1 conversion to Improved Technical Specifications (ITS). The proposed changes are intended to be approved by the NRC in time to implement them in conjunction with the implementation of the ANO-1 ITS, currently scheduled to occur on July 8, 2002.

2.0 PROPOSED CHANGE

The following is a listing of the non-administrative and bases changes proposed in this submittal:

- Required Action A.1 is included in Limiting Condition for Operation (LCO) 3.8.8 Inverters – Shutdown, as is consistent with all revisions of NUREG 1430. This action was inadvertently omitted during the ANO-1 conversion process. The Bases for A.1 is revised accordingly.
- ITS 5.2.2.a is revised back to the current license requirements to require 3 non-licensed operators instead of the two currently shown. This change is intended to maintain consistency with ANO – Unit 2 (ANO-2).
- ITS 5.5.4.b is revised back to the current license requirement for ANO-1 to abide by the limitations set forth in 10 CFR 20, Appendix B, Table II, Column 2 instead of the revised 10 CFR 20 requirements of ten times the concentration values in Appendix B, Table 2, Column 2, to 10 CFR 20.1001 – 20.2402.
- ITS 5.5.4.g is revised back to the current license requirement for ANO-1 to abide by the limitations set forth in 10 CFR 20, Appendix B, Table II, Column 1 instead of the revised 10 CFR 20 requirements listed in ITS 5.5.4.g.1 and 5.5.4.g.2.
- The Bases for LCO 3.7.9 Control Room Ventilation is revised to provide clarification of automatic isolation requirements when in the emergency recirculation mode of operation.

The following changes are administrative in nature. As such, no further discussion of these changes is included in this submittal. Most of the following changes are intended to ensure consistency with the ITS writers guide.

- The footer borderline missing at the bottom of pages 1.1-5, 1.1-6, 1.2-3, 1.3-13, and 1.4-8 is added. No revision mark is shown for this change.

- The borderline at the end of Surveillance Requirement (SR) 3.0.3 on page 3.0-3 is raised from the bottom of the page to the end of the section. No revision mark is shown for this change.
- A required dividing line is inserted between SR 3.7.7.2 and SR 3.7.7.3 on page 3.7.7-2. No revision mark is shown for this change.
- An unnecessary period (.) is deleted in the Required Action A.1.4 "AND" logical connector of LCO 3.8.5 on page 3.8.5-1. No revision mark is shown for this change.
- A double borderline is inserted at the beginning of the SR section on page 3.8.5-2 in lieu of the existing single borderline. No revision mark is shown for this change.
- A single border line is placed at the bottom of the Required Actions section of LCO 3.8.9 on page 3.8.9-1 and a single border line, in lieu of the existing double line, is added to the top of the Required Actions section of LCO 3.8.9 on page 3.8.9-2. No revision mark is shown for this change.
- A double borderline is placed below the Required Actions section of LCO 3.9.4 on page 3.9.4-1. No revision mark is shown for this change.
- "ANO-1 plant manager" is changed to "Plant Manager Operations" in ITS 5.1.1 and 5.2.1 on pages 5.0-1 and 5.0-2. This is the result of a recent title change at ANO.
- During conversion to ITS, the current operating license requirements for post accident sampling were relocated from the operating license to the administrative section of the ITS (5.5.3). Since the relocation, the ANO-1 operating license was renewed for an additional 20 years of operation. The renewal process modified the wording of the post accident sampling section (referred to as Iodine Monitoring in the renewed license). Therefore, ITS 5.5.3 on page 5.0-7 is revised to the new wording of the renewed ANO-1 operating license.
- The last paragraph of ITS 5.5.14.b on page 5.0-23 contains the phrase "do not", adding confusion to the meaning of the statement. "Not" is deleted from this phrase for clarification purposes, and is consistent with NUREG 1430, Revision 2, Specification 5.5.14.d.
- "Shift supervisor" is changed to "Shift Manager" in ITS 5.7.2.a.1 on page 5.0-31, the result of a position title change at ANO.
- The heading "SLS" atop Bases page B 2.1.1-1 is revised to "SLs" since the acronym is intended to be the plural of "safety limits."
- The beginning phrase "Each train of" is deleted from the last sentence at the bottom of Bases page B.3.6.5-1 to prevent confusion. Both reactor building spray trains are required to meet 100% of reactor building design cooling requirements, as is consistent with the ANO-1 Safety Analysis Report (SAR) and the remainder of the 3.6.5 Bases.

- The phrase "reactor building train" is revised in the last sentence of the first paragraph of Bases A.1 on Bases page B 3.6.5-4 to read "reactor building cooling and spray trains" for clarification purposes.
- The phrase "BWST by the" is deleted from the fourth paragraph on Bases page B 3.6.6-2. This phrase appears to be inadvertently placed and has no meaning in this paragraph.
- "SR .8.1.9" is revised to "SR 3.8.1.9" in the first paragraph of SR 3.8.2.1 Bases on Bases page B 3.8.2-6. In addition, the phrase "on Modes 1, 2, 3, and 4" is revised to read "in Modes 1, 2, 3, and 4."
- "Modes 1 and2" is revised to "Modes 1 and 2" in last paragraph on Bases page B 3.8.8-1. In addition, the second to the last sentence in this paragraph is revised to state "minimal in" in lieu of "in minimal."
- "LCO 3.3.16" is revised to "LCO 3.4.3" to provide correct reference in the second line of LCO 3.8.10 Bases on Bases page B 3.8.10-1.
- An unnecessary line space in the middle of the paragraph in SR 3.9.2.2 Bases at the bottom of Bases page B 3.9.2-3 is deleted. No revision mark is shown for this change.
- The "B" letter designation for "Bases" is missing from the header of Bases pages B 3.9.2-1 through -4 and has been reinserted.
- The third sentence of the last paragraph of Bases B.2 on Bases page B 3.9.5-3 contains ANO – Unit 2 (ANO-2) terminology for systems and names. Since this sentence was intended as only a limited example of several alternatives available when no decay heat removal loop is available, it is deleted.
- The LCO section of Bases 3.7.10 on Bases page B 3.7.10-2 is incorrectly references LCO 3.8.6 for Distribution Systems – Operating. This is revised to reference LCO 3.8.9.

In summary, the majority of the proposed changes are administrative in nature. Those changes not considered purely administrative are limited in scope and do not result in a significant change to the Technical Specifications (TS).

3.0 BACKGROUND

The proposed changes noted herein are a result of a detailed post-review performed by ANO personnel of the approved ITS for ANO-1. As stated previously, only five of the proposed changes are considered non-administrative and warrant further discussion and justification within this submittal. It should be noted that the ANO-1 conversion to ITS was based on Revision 1 to NUREG 1430 and included incorporation of several Technical Specification Task Force (TSTF) initiatives previously approved by the NRC.

Non-Administrative Change: LCO 3.8.8, Inverters - Shutdown

During the ITS conversion process, Entergy had requested that LCO 3.8.8 wording deviate from that found in NUREG 1430, Rev. 1 by incorporating TSTF 204, Rev. 3 (reference Discussion of Differences (DOD) 56 of Section 3.8 portion of final ITS package). The proposed LCO wording would require just one inverter to be operable in Modes 5 and 6 in place of the NUREG wording that required any number of inverters to be operable, based on the equipment operability requirements of LCO 3.8.10. NUREG 1430 LCO 3.8.8 Required Action A.1 was also omitted as part of incorporating the TSTF. This action allowed declaring affected equipment inoperable in lieu of suspending fuel movement activities when required inverters were lost.

The NRC did not approve the proposed LCO wording change. Entergy subsequently proposed revising the LCO wording back to that of the NUREG without the changes of the TSTF incorporated. Inadvertently, Required Action A.1 was not re-inserted at that time. Therefore, Entergy requests this Required Action be re-inserted into ITS 3.8.8 to establish consistency with NUREG 1430, Rev 1. Applicable portions of the NUREG 1430 Bases for Required Action A.1 are also re-inserted to the appropriate Bases section.

Non-Administrative Change: ITS 5.2.2.a, Unit Staff

The ANO-1 current technical specifications (CTS) require three non-licensed operators to be on site in Modes 1, 2, 3, and 4. During the conversion to ITS, the requirement for one of the three non-licensed operators was relocated to the SAR. This change proved to be inconsistent with the ANO-2 TSs. After further internal discussion, Entergy has determined that retaining the requirement of three non-licensed operators in the TSs is not an unnecessary hardship or burden and will maintain consistency with the ANO-2 TSs. Therefore, Entergy proposes that ITS 5.2.2.a be revised to require three non-licensed operators to be on site in Modes 1, 2, 3, and 4.

Non-Administrative Change: ITS 5.5.4.b and 5.5.4.g, Radiological Effluents Controls Program

During the ANO-1 conversion process to ITS, Entergy proposed revising the TS-required limits for radioactive gaseous and liquid releases to be consistent with the recent revisions to 10 CFR 20. Shortly after approval of such, Entergy discovered that the existing software available at ANO would not support conversion to the revised 10 CFR 20 requirements. Fabrication, purchase, and installation of new software is expected to reach as much as \$300,000. Therefore, Entergy is requesting that the limitation requirements of the CTS (10 CFR 20 requirements prior to revision) be inserted in lieu of the revised 10 CFR 20 requirements of the ITS.

Non-Administrative Change: ITS Bases 3.7.9, Control Room Emergency Ventilation

Although not related to the ANO-1 conversion to ITS, in order to ensure that both ANO and the NRC begin with a matching copy of the ITS upon implementation, a change to the bases for the CREVS is requested. The ANO-1 CTS and the approved ITS require automatic actuation of at least one CREVS train on a high radiation signal. Because of this, when all radiation

monitors are inoperable, it appears that the CREVS train would also be inoperable, requiring entry into the Required Actions of ITS 3.7.9. However, if the control room is placed in the emergency recirculation mode (dampers isolated and emergency ventilation in service), the system's safety function is being met and an additional requirement for automatic actuation is unnecessary. Therefore, Entergy proposes a change to the bases that describes that the automatic actuation of the CREVS on high radiation is not required when operating the system in the emergency recirculation mode.

4.0 TECHNICAL ANALYSIS

The following justifications are provided in support of the non-administrative changes included in this submittal.

Non-Administrative Change: LCO 3.8.8, Inverters - Shutdown

The inadvertent omission of Required Action A.1 in ITS 3.8.8, although considered a non-administrative change, has no technical connotation. This action permits declaring affected features inoperable upon loss of a required inverter(s) in lieu of suspending fuel movement. Suspension of fuel movement may be required upon entering the Required Actions of other affected specifications. The re-admission of Required Action A.1, as described in the Section 3.0 above, is consistent with NUREG 1430, Revisions 1 and 2. Applicable portions of the NUREG 1430 Bases for Required Action A.1 are also re-admitted to the appropriate Bases section.

Non-Administrative Change: ITS 5.2.2.a, Unit Staff

Entergy's proposal to revise ITS 5.2.2.a to require three non-licensed operators to be on site in Modes 1, 2, 3, and 4 is non-technical in nature. Details of the history of this requirement are described in Section 3.0 above. Although this change is more restrictive with respect to the ITS, it remains consistent with the CTS. Therefore, no further justification is necessary. Maintaining the requirement for three non-licensed operators in the TSs maintains consistency with the ANO-2 TSs.

Non-Administrative Change: ITS 5.5.4.b and 5.5.4.g, Radiological Effluents Controls Program

Updating needed software to support the new values and limitations of the revised 10 CFR 20 would result in costs approaching or exceeding \$300,000. Currently, compliance with either the revised 10 CFR 20 requirements or the requirements of the pre-revised version have been found acceptable throughout the industry and to the NRC. Since complying with the revised values of 10 CFR 20 will result in a significant financial burden, Entergy proposes ITS 5.5.4.b and 5.5.4.g be changed back to the CTS requirements of pre-revision 10 CFR 20 requirements. The specific wording change may be reviewed in Section 2.0 of this submittal or in the markup ITS pages attached. Because this change does not reduce the current requirements for ANO-1, no adverse impact to the health and safety of the public results from the changes.

Non-Administrative Change: ITS Bases 3.7.9, Control Room Emergency Ventilation

The ANO-1 CTS and the approved ITS require automatic actuation of at least one CREVS train on a high radiation signal. Because of this, when all radiation monitors are inoperable, it appears that the CREVS train would also be inoperable, requiring entry into the Required Actions of ITS 3.7.9. However, if the control room is placed in the emergency recirculation mode (dampers isolated and emergency ventilation in service), the system's safety function is being met and an additional requirement for automatic actuation is unnecessary. Therefore, Entergy proposes a change to the bases that describes that the automatic actuation of the CREVS on high radiation is not required when operating the system in the emergency recirculation mode. Because the safety function of the system is being actively met in this mode of operation, this clarification in the bases has no adverse impact on the operation of the unit or the health and safety of the public.

5.0 REGULATORY ANALYSIS

5.1 Applicable Regulatory Requirements/Criteria

The proposed non-administrative changes have been evaluated to determine whether applicable regulations and requirements continue to be met.

The re-admission of Required Action A.1 that permits declaring affected features inoperable upon a loss of a required inverter(s) in lieu of suspending fuel movement is consistent with NUREG 1430, Revisions 1 and 2 and does not conflict with any other regulation.

Increasing the number of required non-licensed operators on-site in Modes 1, 2, 3, and 4 from two to three operators is conservative with respect to personnel staffing requirements of 10 CFR 50.54. This proposed change does not conflict with any existing regulation.

Maintaining the CTS requirements relating to the 10 CFR 20 limitations set forth for radioactive gaseous and liquid releases in lieu of the ITS requirements that apply the revised values and limitations of 10 CFR 20 is permissible. Compliance with either the old or revised requirements of 10 CFR 20 maintains the health and safety of the public and is, therefore, acceptable.

The proposed change to the CREVS Bases clarifies that automatic control room isolation requirements are not necessary when operating in the fail-safe mode (emergency recirculation mode of operation). Control room habitability systems and associated requirements are discussed in numerous documents including 10 CFR 50, Appendix A, General Design Criteria (GDC) 19, Regulatory Guides 1.78 and 1.95, Information Notices 86-76 and 88-61, NUREG-0737 Item III D.3.4, NUREG-0700, IEEE-279, etc. The proposed change to the CREVS Bases, does not, however, conflict with the requirements of these various documents.

Entergy has determined that the proposed changes do not require any exemptions or relief from regulatory requirements, other than the TS, and do not affect conformance with any GDC differently than described in the SAR.

5.2 No Significant Hazards Consideration

Entergy Operations, Inc. (Entergy) proposes changes to the Arkansas Nuclear One – Unit 1 (ANO-1) Improved Technical Specifications (ITS) currently scheduled to be implemented on July 8, 2002. The majority of the proposed changes are administrative in nature. However, changes regarding radiological effluent releases, the required actions relevant to the loss of a required inverter in Modes 5 and 6, the number of non-licensed operators required on-site in Modes 1, 2, 3, and 4, and the clarification associated with the Bases for automatic isolation of the Control Room Emergency Ventilation System (CREVS) are considered non-administrative and, therefore, are evaluated under the following criteria.

Entergy Operations, Inc. has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Do the proposed changes involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The non-administrative proposed changes describe required actions to be taken upon loss of required electrical equipment, the number of non-licensed operators required on-site in Modes 1, 2, 3, and 4, the limitations on radiological effluent releases, and a clarification of automatic isolation capabilities when the control room is operating in the emergency recirculation mode. The proposed changes are not considered accident initiators nor do they result in a change to the physical characteristics of plant equipment. The proposed changes act to provide reasonable response to lost equipment, defense in depth, limitations on radiological release, and placing equipment in a fail-safe condition and do not adversely affect the accident analysis.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed changes create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The non-administrative proposed changes describe required actions to be taken upon loss of required electrical equipment, the number of non-licensed operators required on-site in Modes 1, 2, 3, and 4, the limitations on radiological effluent releases, and a clarification of automatic isolation capabilities when the control room is operating in the emergency recirculation mode. None of the proposed changes can initiate any type of accident in and by themselves. The proposed changes act only to provide reasonable response to lost equipment, defense in depth, limitations on radiological release, and placing equipment in a fail-safe condition.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

3. Do the proposed changes involve a significant reduction in a margin of safety?

Response: No.

The aforementioned non-administrative proposed changes do not significantly impact the margin of safety. The proposed required action to be performed upon loss of a required inverter in Modes 5 and 6 provides a possible alternative to suspending fuel movement by taking conservative action to identify and declare inoperable, all equipment affected by the loss of the required inverter. These actions may in turn, require suspension of refueling activities, but in any event act to ensure the unit is maintained in a safe shutdown condition.

The increase in the number of required non-licensed operators on-site in Modes 1, 2, 3, and 4 is conservative and acts to improve the margin to safety by expanding the station's defense in depth.

Complying with the radiological effluent release limitations as set forth in 10 CFR 20 (prior to revision) provides acceptable assurance that the health and safety of the public will be maintained. ANO-1 current complies with this version of 10 CFR 20.

Finally, the proposed Bases change for the CREVS clarifies that automatic isolation signals and devices are not required when the control room is already isolated and operating in the emergency recirc mode of operation. When in this configuration, the control room habitability system meets the safety function for which it was designed. Thus, this clarification does not affect the margin to safety.

Therefore, the proposed changes do not involve a significant reduction in the margin of safety.

Based on the above, Entergy concludes that the proposed amendments present no significant hazards considerations under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.3 Environmental Considerations

The proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

Attachment 2

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Proposed Technical Specification and Bases Changes (mark-up)

1.1 Definition (continued)

SHUTDOWN MARGIN (SDM)	<p>SDM shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming:</p> <ul style="list-style-type: none">a. All full length CONTROL RODS (safety and regulating) are fully inserted except for the single CONTROL ROD of highest reactivity worth, which is assumed to be fully withdrawn. With any CONTROL ROD not capable of being fully inserted, the reactivity worth of these CONTROL RODS must be accounted for in the determination of SDM;b. In MODES 1 and 2, the fuel and moderator temperatures are changed to the nominal zero power design level; andc. There is no change in APSR position.
STAGGERED TEST BASIS	<p>A STAGGERED TEST BASIS shall consist of the testing of one of the systems, subsystems, channels, or other designated components during the interval specified by the Surveillance Frequency, so that all systems, subsystems, channels, or other designated components are tested during n Surveillance Frequency intervals, where n is the total number of systems, subsystems, channels, or other designated components in the associated function.</p>
THERMAL POWER	<p>THERMAL POWER shall be the total reactor core heat transfer rate to the reactor coolant.</p>

Table 1.1-1

MODES

MODE	TITLE	REACTIVITY CONDITION (k_{eff})	% RATED THERMAL POWER ^(a)	AVERAGE REACTOR COOLANT TEMPERATURE (°F)
1	Power Operation	≥ 0.99	> 5	NA
2	Startup	≥ 0.99	≤ 5	NA
3	Hot Standby	< 0.99	NA	≥ 280
4	Hot Shutdown ^(b)	< 0.99	NA	$280 > T_{\text{avg}} > 200$
5	Cold Shutdown ^(b)	< 0.99	NA	≤ 200
6	Refueling ^(c)	NA	NA	NA

(a) Excluding decay heat.

(b) All reactor vessel head closure bolts fully tensioned.

(c) One or more reactor vessel head closure bolts less than fully tensioned.

1.2 Logical Connectors

EXAMPLES (continued)

EXAMPLE 1.2-2

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. LCO not met.	A.1 Trip . . . <u>OR</u> A.2.1 Verify . . . <u>AND</u> A.2.2.1 Reduce . . . <u>OR</u> A.2.2.2 Perform . . . <u>OR</u> A.3 Align . . .	

This example represents a more complicated use of logical connectors. Required Actions A.1, A.2, and A.3 are alternative choices, only one of which must be performed as indicated by the use of the logical connector OR and the left justified placement. Any one of these three Actions may be chosen. If A.2 is chosen, then both A.2.1 and A.2.2 must be performed as indicated by the logical connector AND. Required Action A.2.2 is met by performing A.2.2.1 or A.2.2.2. The indented position of the logical connector OR indicates that A.2.2.1 and A.2.2.2 are alternative choices, only one of which must be performed.

1.3 Completion Times

IMMEDIATE COMPLETION TIME	When "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.
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1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-6

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>-----NOTE-----</p> <p>Not required to be met in MODE 3.</p> <p>-----</p> <p>Verify parameter is within limits.</p>	24 hours

Example 1.4-6 specifies that the requirements of this Surveillance do not have to be met while the unit is in MODE 3 (the assumed Applicability of the associated LCO is MODES 1,2, and 3). The interval measurement for the Frequency of this Surveillance continues at all times, as described in Example 1.4-1. However, the Note constitutes an "otherwise stated" exception to the Applicability of this Surveillance. Therefore, if the Surveillance were not performed within the 24 hour interval (plus the extension allowed by SR 3.0.2), and the unit was in MODE 3, there would be no failure of the SR nor failure to meet the LCO. Therefore, no violation of SR 3.0.4 occurs when changing MODES to enter MODE 3, even with the 24 hour Frequency exceeded, provided the MODE change does not result in entry into MODE 2. Prior to entering MODE 2 (assuming again that the 24 hour Frequency were not met), SR 3.0.4 would require satisfying the SR.

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.7.1	<p>-----NOTE----- Isolation of SWS flow to individual components does not render the SWS inoperable. -----</p> <p>Verify each SWS manual, power operated, and automatic valve in the flow path servicing safety related equipment, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	31 days
SR 3.7.7.2	Verify each SWS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal.	18 months
SR 3.7.7.3	Verify each required SWS pump starts automatically on an actual or simulated signal.	18 months

3.8 ELECTRICAL POWER SYSTEMS

3.8.5 DC Sources - Shutdown

LCO 3.8.5 The DC electrical power subsystem shall be OPERABLE to support the DC electrical power distribution subsystem(s) required by LCO 3.8.10, "Distribution Systems – Shutdown."

APPLICABILITY: MODES 5 and 6,
During movement of irradiated fuel assemblies.

ACTIONS

-----NOTE-----
LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required DC electrical power subsystems inoperable.	A.1.1 Suspend CORE ALTERATIONS. <u>AND</u>	Immediately
	A.1.2 Suspend movement of irradiated fuel assemblies. <u>AND</u>	Immediately
	A.1.3 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration. <u>AND</u>	Immediately
	A.1.4 Initiate action to restore required DC electrical power subsystems to OPERABLE status. <u>AND</u>	Immediately

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. (continued)	A.1.5 Enter applicable Conditions and Required Actions of LCO 3.4.11, "Low Temperature Overpressure Protection (LTOP) System," for LTOP features made inoperable by Condition A.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.8.5.1</p> <p>-----NOTE----- The following SRs are not required to be performed: SR 3.8.4.2 and SR 3.8.4.3. -----</p> <p>For DC sources required to be OPERABLE, the following SRs are applicable:</p> <p>SR 3.8.4.1, SR 3.8.4.2, and SR 3.8.4.3.</p>	In accordance with applicable SRs

3.8 ELECTRICAL POWER SYSTEMS

3.8.8 Inverters - Shutdown

LCO 3.8.8 Inverters shall be OPERABLE to support the onsite Class 1E AC vital bus electrical power distribution subsystem(s) required by LCO 3.8.10, "Distribution Systems – Shutdown."

APPLICABILITY: MODES 5 and 6,
During movement of irradiated fuel assemblies.

ACTIONS

-----NOTE-----
LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required inverters inoperable.	A.1 <u>Declare affected required feature(s) inoperable.</u>	<u>Immediately</u>
	<u>OR</u>	
	A.2.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	A.2.2 Suspend movement of irradiated fuel assemblies.	Immediately
	<u>AND</u>	
	A.2.3 Suspend operations involving positive reactivity additions that could result in loss of required SDM or boron concentration.	Immediately
	<u>AND</u>	
	A.2.4 Initiate action to restore required inverters to OPERABLE status.	Immediately
	<u>AND</u>	

3.8 ELECTRICAL POWER SYSTEMS

3.8.9 Distribution Systems - Operating

LCO 3.8.9 Two AC, DC, and 120 VAC electrical power distribution subsystems shall be OPERABLE.

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

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more AC electrical power distribution subsystem(s) inoperable.	A.1 Restore AC electrical power distribution subsystem(s) to OPERABLE status.	8 hours <u>AND</u> 16 hours from discovery of failure to meet LCO
B. One or more 120 VAC electrical power distribution subsystem(s) (RS1, RS2, RS3, RS4) inoperable.	B.1 Restore 120 VAC electrical power distribution subsystem(s) to OPERABLE status.	8 hours <u>AND</u> 16 hours from discovery of failure to meet LCO
C. 120 VAC electrical power distribution subsystem C540 inoperable.	C.1 Enter applicable Conditions and Required Actions of LCO 3.3.11, "Emergency Feedwater Initiation and Control (EFIC) System Instrumentation," LCO 3.3.15, "Post Accident Monitoring (PAM) Instrumentation," and LCO 3.4.14, "RCS Pressure Isolation Valve (PIV) Leakage."	Immediately

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
D. One or more DC electrical power distribution subsystem(s) inoperable.	D.1 Restore DC electrical power distribution subsystem(s) to OPERABLE status.	8 hours <u>AND</u> 16 hours from discovery of failure to meet LCO
E. Required Action and associated Completion Time not met.	E.1 Be in MODE 3. <u>AND</u> E.2 Be in MODE 5.	12 hours 36 hours
F. Two or more electrical power distribution subsystems inoperable that result in a loss of function.	F.1 Enter LCO 3.0.3.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.8.9.1 Verify correct breaker alignments to required AC, DC, and 120 VAC bus electrical power distribution subsystems.	7 days

3.9 REFUELING OPERATIONS

3.9.4 Decay Heat Removal (DHR) and Coolant Circulation - High Water Level

LCO 3.9.4 One DHR loop shall be OPERABLE and in operation.

-----NOTE-----
The required DHR loop may be removed from operation for ≤ 1 hour per 8 hour period, provided no operations are permitted that would cause introduction into the Reactor Coolant System, coolant with boron concentration less than that required to meet the minimum required boron concentration of LCO 3.9.1.

APPLICABILITY: MODE 6 with the water level ≥ 23 ft above the top of the irradiated fuel seated in the reactor pressure vessel.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. DHR loop requirements not met.	A.1 Suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of LCO 3.9.1.	Immediately
	<u>AND</u>	
	A.2 Suspend loading irradiated fuel assemblies in the core.	Immediately
	<u>AND</u>	
	A.3 Initiate action to satisfy DHR loop requirements.	Immediately
	<u>AND</u>	
	A.4 Close all reactor building penetrations providing direct access from the reactor building atmosphere to outside atmosphere.	4 hours

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

- 5.1.1 The ~~ANO-1 Plant Manager~~ Operations shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.
- 5.1.2 An individual with an active Senior Reactor Operator (SRO) license shall be designated as responsible for the control room command function while the unit is in MODE 1, 2, 3, or 4. With the unit not in MODES 1, 2, 3, or 4, an individual with an active SRO or Reactor Operator license shall be designated as responsible for the control room command function.
-

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

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

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the unit specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the Safety Analysis Report (SAR);
- b. The ~~ANO-1 Plant~~ Plant Manager Operations shall be responsible for overall safe operation of the unit and shall have control over those onsite activities necessary for safe operation and maintenance of the unit;
- c. A specified corporate executive shall have corporate responsibility for overall unit nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the unit to ensure nuclear safety. The specified corporate executive shall be identified in the SAR; and
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

- a. A non-licensed operator shall be on site when fuel is in the reactor and ~~an~~ two additional non-licensed operator shall be on site when the reactor is in MODES 1, 2, 3, or 4.
- b. The minimum shift crew composition for licensed operators shall meet the minimum staffing requirements of 10 CFR 50.54(m)(2)(i) for one unit, one control room.

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at least once per 18 months. The provisions of SR 3.0.2 are applicable.

5.5.3 Post-Accident Sampling/Iodine Monitoring

This program provides controls that ensure the capability to ~~obtain and analyze reactor coolant, radioactive~~ accurately determine the airborne iodine concentration, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;
- b. Procedures for ~~sampling and analysis~~ monitoring; and
- c. Provisions for maintenance of sampling and analysis equipment.

5.5.4 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ~~ten times the concentration values in~~ 10 CFR 20, Appendix B, Table 2II, Column 2, ~~to 10 CFR 20.1001-20.2402;~~

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

- 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 ODCM;
- 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 dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM 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 ~~from the site to areas at or beyond the site boundary shall be in accordance with the following: conforming to the dose associated with 10 CFR 20, Appendix B, Table II, Column 1;~~
 - ~~1. For noble gases: a dose rate \leq 500 mrem/yr to the whole body and a dose rate \leq 3000 mrem/yr to the skin, and~~
 - ~~2. For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days: a dose rate \leq 1500 mrem/yr to any organ;~~
- 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 beyond the site boundary due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

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

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

1. an API gravity or an absolute specific gravity within limits,
 2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
 3. water and sediment within limits;
- b. Within 31 days following addition of new fuel oil to storage tanks, verify that the properties of the new fuel oil, other than those addressed in a. above, are within limits for ASTM 2D fuel oil;
 - c. Total particulate concentration of the fuel oil is ≤ 10 mg/l when tested every 31 days based on ASTM D-2276, Method A-2 or A-3; and
 - d. The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program surveillance Frequencies.

5.5.14 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 SAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

Proposed changes that do not meet these criteria 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).

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

5.0 ADMINISTRATIVE CONTROLS

5.7 High Radiation Area

4. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
 - (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
 - (ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.
- e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

5.7.2

High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation

- a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and, in addition:
 1. All such door and gate keys shall be maintained under the administrative control of the shift supervisor~~supervisor~~manager, radiation protection manager, or his or her designee.
 2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.
- b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

Attachment 3

1CAN030201

Changes to Technical Specification Bases Pages

B 2.0 SAFETY LIMITS (SLs)

B 2.1.1 Reactor Core SLs

BASES

BACKGROUND

GDC 10 (Ref. 1) requires that reactor core SLs ensure specified acceptable fuel design limits are not exceeded during steady state operation, normal operational transients, and abnormalities. This is accomplished by having a departure from nucleate boiling (DNB) design basis, which corresponds to a 95% probability at a 95% confidence level (95/95 DNB criterion) that DNB will not occur and by requiring that the fuel centerline temperature stays below the melting temperature.

Although DNB is not an observable parameter during reactor operation, the observable parameters of neutron power, reactor coolant flow, temperature and pressure can be related to DNB through the use of a critical heat flux (CHF) correlation. The BAW-2 (Ref. 2) and BWC (Ref. 3) correlations have been developed to predict DNB and the location of DNB for axially uniform and non-uniform heat flux distributions. The BAW-2 correlation applies to Mark-B fuel and the BWC correlation applies to Mark-BZ fuel. The local DNB ratio (DNBR), defined as the ratio of the heat flux that would cause DNB at a particular core location to the actual heat flux, is indicative of the margin to DNB. The minimum value of the DNBR, during steady state operation, normal operational transients and anticipated transients is limited to 1.30 (BAW-2) and 1.18 (BWC).

The 95 percent confidence level that DNB will not occur is preserved by ensuring that the DNBR remains greater than the DNBR design limit based on the applicable CHF correlation for the core design. In the development of the applicable DNBR design limit, uncertainties in the core state variables, power peaking factors, manufacturing-related parameters, and the CHF correlation may be statistically combined to determine a statistical DNBR design limit. This statistical design limit protects the respective CHF design limit. Additional retained thermal margin may also be applied to the statistical DNBR design limit to yield a higher thermal design limit for use in establishing DNB-based core safety and operating limits. In all cases, application of statistical DNB design methods preserves a 95 percent probability at a 95 percent confidence level that DNB will not occur (Ref. 4).

The restrictions of this SL prevent overheating of the fuel and cladding and possible cladding perforation that would result in the release of fission products to the reactor coolant. Overheating of the fuel is prevented by maintaining the steady state peak linear heat rate (LHR) below the level at which fuel centerline melting occurs. The maximum fuel centerline temperatures are given by the relationships defined in SL 2.1.1.1 for the respective fuel designs and are dependent on whether the TACO2 (Ref. 5) or TACO3 (Ref. 6) analysis was utilized. Overheating of the fuel cladding is prevented by restricting fuel operation to within the nucleate boiling regime, where the heat transfer coefficient is large and the cladding surface temperature is slightly above the coolant saturation temperature.

B 3.6 REACTOR BUILDING SYSTEMS

B 3.6.5 Reactor Building Spray and Cooling Systems

BASES

BACKGROUND

The Reactor Building Spray and Reactor Building Cooling systems provide reactor building atmosphere cooling to limit post accident pressure and temperature in the reactor building to less than the design values. In the event of a Design Basis Accident (DBA), reduction of reactor building pressure reduces the release of fission products from the reactor building to the environment. The Reactor Building Spray and Reactor Building Cooling systems are designed to meet the requirements as discussed in the Safety Analysis Report (SAR), specifically, GDC 38, "Containment Heat Removal," GDC 39, "Inspection of Containment Heat Removal System," GDC 40, "Testing of Containment Heat Removal System," GDC 41, "Containment Atmosphere Cleanup," GDC 42, "Inspection of Containment Atmosphere Cleanup," and GDC 43, "Testing of Containment Atmosphere Cleanup Systems" (Ref. 1).

The Reactor Building Cooling System and Reactor Building Spray System are Engineered Safeguards (ES) systems. They are designed to ensure that the heat removal capability required during the post accident period can be attained. The Reactor Building Spray System and Reactor Building Cooling System provide redundant reactor building heat removal operation. The Reactor Building Spray System and Reactor Building Cooling System provide redundant methods to limit and maintain post accident conditions to less than the reactor building design values.

Reactor Building Spray System

The Reactor Building Spray System consists of two separate trains of equal capacity, each capable of meeting the design basis. Each train includes a reactor building spray pump, spray headers, nozzles, valves, and piping. Each train is powered from a separate ES bus. The borated water storage tank (BWST) supplies borated water to the Reactor Building Spray System during the injection phase of operation. In the recirculation mode of operation, Reactor Building Spray System pump suction is manually transferred to the reactor building sump.

The Reactor Building Spray System provides a spray of borated water into the upper regions of the reactor building to reduce the reactor building pressure and temperature during a DBA. During MODE 1 or 2, the Reactor Building Spray System supports the Spray Additive System function of iodine removal by providing the distribution mechanism. In MODES 3 and 4, sodium hydroxide is not mixed with the spray flow. In the recirculation mode of operation, heat is removed from the reactor building sump water by the decay heat removal coolers. ~~Each train of the~~ Reactor Building Spray System provides adequate spray coverage to meet the system design requirements for reactor building heat removal.

LCO (continued)

The Reactor Building Spray System includes spray pumps, spray headers, nozzles, valves, piping, instruments, and controls to ensure an OPERABLE flow path capable of taking suction from the BWST upon an Engineered Safeguards Actuation System signal and manually transferring suction to the reactor building sump.

The Reactor Building Cooling System includes cooling coils, dampers, axial flow fans, single speed fan motors, instruments, and controls to ensure an OPERABLE flow path.

APPLICABILITY

In MODES 1, 2, 3, and 4, the reactor building OPERABILITY for the limiting Design Basis Accidents is based on full power operation. Although reduced power in the lower MODES would not require the same level of accident mitigation performance, there are no accident analyses for reduced performance in the lower MODES. Since an event could cause a release of radioactive material in the reactor building as well as a temperature and pressure rise, the Reactor Building Spray System and the Reactor Building Cooling System are required to be OPERABLE in MODES 1, 2, 3, and 4.

In MODES 5 and 6, the probability and consequences of these events are reduced due to the pressure and temperature limitations of these MODES. Thus, the Reactor Building Spray System and the Reactor Building Cooling System are not required to be OPERABLE in MODES 5 and 6.

ACTIONS

A.1

With one reactor building spray train inoperable in MODE 1 or 2, the inoperable reactor building spray train must be restored to OPERABLE status within 72 hours. In this Condition, the remaining OPERABLE spray and cooling trains are adequate to support the iodine removal and perform the reactor building cooling functions. The 72 hour Completion Time takes into account the redundant heat and iodine removal capability afforded by the OPERABLE reactor building cooling and spray trains, reasonable time for repairs, and the low probability of a DBA occurring during this period.

The 10 day portion of the Completion Time for Required Action A.1 is based on the low probability of coincident entry into two Conditions in this LCO coupled with the low probability of an accident occurring during this time. Refer to Section 1.3, Completion Times for a more detailed discussion of the purpose of the "from discovery of failure to meet the LCO" portion of the Completion Time

APPLICABLE SAFETY ANALYSES

The reactor building Spray Additive System provides for the effective removal of airborne iodine within the reactor building following a DBA.

Following the assumed release of radioactive materials into the reactor building, the reactor building is assumed to leak at its design value following the accident. The analysis assumes that most of the reactor building volume is covered by the spray.

The delay time assumed for the Spray Additive System is the same as for the Reactor Building Spray System and is discussed in the Bases for LCO 3.6.5, "Reactor Building Spray and Cooling Systems."

The LOCA analyses assume that one train of the Reactor Building Spray System/Spray Additive System is inoperable and that sufficient NaOH volume is added to the remaining BWST by the Reactor Building Spray System flow path.

In the evaluation of the worst-case LOCA, the safety analysis assumed that an alkaline reactor building spray effectively reduced the airborne iodine.

Each Reactor Building Spray System suction line is equipped with its own gravity feed from the NaOH tank. Therefore, in the event of a single failure within the Spray Additive System (i.e., NaOH isolation valve failure), NaOH will still be mixed with the borated water, establishing the alkalinity to provide effective iodine removal.

The Spray Additive System satisfies Criterion 3 of 10 CFR 50.36 (Ref. 2).

LCO

The Spray Additive System is necessary to reduce the release of radioactive material to the environment in the event of a DBA. To be considered OPERABLE, the volume and concentration of the NaOH solution must be sufficient to provide NaOH into the spray flow until the Reactor Building Spray System suction path is switched from the BWST to the reactor building sump and to raise the long term sump solution pH to a level conducive to iodine removal. The long term sump solution pH is in the alkaline range. This pH maximizes the effectiveness of the iodine retention mechanism without introducing conditions that may induce caustic stress corrosion cracking of mechanical system components. In addition, it is essential that valves in the Spray Additive System flow paths are properly positioned and that automatic valves are capable of activating to their correct positions.

LCO

Two CREVS trains are required to be OPERABLE to ensure that at least one is available if a single failure disables the other train. Total system failure could result in exceeding a dose of 5 rem to the control room operators in the event of a large radioactive release.

For a CREVS train to be considered OPERABLE, the CREVS train must include the associated:

- a. OPERABLE fan capable of being powered from both a normal and an OPERABLE emergency power source. (Note: Because this is a shared system, and may be powered from a Unit 2 source and distribution system for which there are no specific ANO-1 requirements, OPERABILITY includes requirements for both normal and emergency power sources and the associated distribution systems. If the CREVS train power sources or distribution system become inoperable, LCO 3.8.1, "AC Sources-Operating," is applicable for ANO-1 power sources, LCO 3.8.6, "Distribution Systems-Operating," is applicable for ANO-1 distribution systems, and LCO 3.0.6 allows the appropriate ACTIONS for these Specifications to be applied. However, if a required Unit 2 power source or distribution system becomes inoperable, the ACTIONS of ANO-1 LCO 3.7.9 must be applied for inoperable CREVS train(s).);
- b. OPERABLE HEPA filter and charcoal adsorber; and
- c. OPERABLE ductwork and dampers sufficient to maintain air circulation and provide adequate makeup air flow.

In addition, the control room envelope, including the integrity of the walls, floors, ceilings, ductwork, and access doors, must be maintained within the assumptions of the design analysis.

The LCO is modified by two Notes. Note 1 allows the control room boundary to be opened intermittently under administrative controls. For entry and exit through doors the administrative control of the opening is performed by the person(s) entering or exiting the area. For other openings, these controls consist of stationing a dedicated individual at the opening who is in continuous communication with the control room. This individual will have a method to rapidly close the opening when a need for control room isolation is indicated. Note 2 requires that one CREVS train be capable of automatic actuation. The other train may be started manually, on failure of the first train. If the control room is isolated and operating in the emergency recirculation mode, automatic actuation of the CREVS train is no longer required.

LCO

Two independent and redundant trains of the CREACS are required to be OPERABLE to ensure that at least one is available, assuming a single failure disables the other train. Total system failure could result in the control room temperature exceeding limits in the event of an accident.

For a CREACS train to be considered OPERABLE, the individual components that are necessary to maintain control room temperature must be OPERABLE. (Note: Because this is a shared system and is normally powered from a Unit 2 source and distribution system for which there are no specific ANO-1 requirements, OPERABILITY includes requirements for both normal and emergency power sources and the associated distribution systems. If the CREACS train power sources or distribution system become inoperable, LCO 3.8.1, "AC Sources-Operating," is applicable for ANO-1 power sources, LCO 3.8.96, "Distribution Systems-Operating," is applicable for ANO-1 distribution systems, and LCO 3.0.6 allows the appropriate ACTIONS for these Specifications to be applied. However, if a required Unit 2 power source or distribution system becomes inoperable, the ACTIONS of ANO-1 LCO 3.7.10 must be applied for inoperable CREACS train(s).) These components include the cooling coils, condensing units, and associated temperature control instrumentation. In addition, the CREACS must be capable of maintaining air circulation.

APPLICABILITY

In MODES 1, 2, 3, and 4, and during movement of irradiated fuel assemblies, the CREACS must be OPERABLE to ensure that the control room temperature will not exceed habitability and equipment OPERABILITY requirements following isolation of the control room.

ACTIONS

A.1

With one CREACS train inoperable, action must be taken to restore OPERABLE status within 30 days. In this Condition, the remaining OPERABLE CREACS train is adequate to maintain the control room temperature within limits. However, the overall reliability is reduced because a failure in the OPERABLE CREACS train could result in a loss of CREACS function. The 30 day Completion Time is based on the low probability of an event occurring requiring control room isolation, the consideration that the remaining train can provide the required capabilities, and alternate nonsafety related cooling means that are available.

ACTIONS (continued)

A.2.1, A.2.2, A.2.3, A.2.4, B.1, B.2, B.3, and B.4 (continued)

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required AC electrical power sources should be completed as quickly as possible in order to minimize the time during which the unit safety systems may be without sufficient power.

Pursuant to LCO 3.0.6, the Distribution System's ACTIONS are not entered even if all AC sources to it are inoperable, resulting in de-energization. Therefore, the Required Actions of Condition A are modified by a Note to indicate that when Condition A is entered with no AC power to any required ES bus, the ACTIONS for LCO 3.8.10 must be immediately entered. This Note allows Condition A to provide requirements for the loss of the offsite circuit, whether or not a train is de-energized. LCO 3.8.10 provides the appropriate restrictions for the situation involving a de-energized train.

SURVEILLANCE REQUIREMENTS

SR 3.8.2.1

SR 3.8.2.1 requires the SRs from LCO 3.8.1 that are necessary for ensuring the OPERABILITY of the AC sources in other than MODES 1, 2, 3, and 4. SR 3.8.1.4 is not required to be met since crediting manual start of the required DG provides sufficiently opportunity to ensure that the fuel oil transfer system is operating properly. SR 3.8.1.7 is not required to be met since only one offsite circuit is required to be OPERABLE. SR 3.8.1.8 and SR 3.8.1.9 are not required to be met because they provide for testing of engineered safeguards actuation signals which are not required to be OPERABLE except in MODES 1, 2, 3, and 4. Automatic actuation and loading of the DGs is not assumed in MODES 5 and 6.

This SR is modified by two Notes. The reason for Note 1 is to preclude requiring the OPERABLE DG from being paralleled with the offsite power network or otherwise rendered inoperable during performance of SRs, and to preclude deenergizing a required 4160 V ES bus or disconnecting a required offsite circuit during performance of this SR. With limited AC sources available, a single event could compromise both the required circuit and the DG. It is the intent that this SR must be capable of being met, but actual performance is not required during periods when the DG and offsite circuit are required to be OPERABLE. When Note 1 is considered, SR 3.8.2.1 requires the following:

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.8 Inverters - Shutdown

BASES

BACKGROUND

A description of the inverters is provided in the Bases for LCO 3.8.7, "Inverters - Operating."

APPLICABLE SAFETY ANALYSES

The DC to AC inverters are designed to provide the required capacity, capability, and reliability to ensure the availability of necessary power to safety significant instrumentation and controls.

The OPERABILITY of the inverters is consistent with the requirements for the supported systems' OPERABILITY.

The OPERABILITY of the required inverters to each required 120 VAC vital bus during MODES 5 and 6 ensures that:

- a. The unit can be maintained in MODE 5 or 6 for extended periods;
- b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status; and
- c. Adequate power is available to mitigate a postulated fuel handling accident.

In general, when the unit is shutdown, the Technical Specifications requirements ensure that the unit has the capability to mitigate the consequences of postulated accidents. However, assuming a single failure and concurrent loss of all offsite or all onsite power is not required. The rationale for this is based on the fact that many Design Basis Accidents (DBAs) that are analyzed in MODES 1 and 2 have no specific analyses in MODES 3, 4, 5 and 6. Worst case bounding events are deemed not credible in MODES 5 and 6 because the energy contained within the reactor pressure boundary, reactor coolant temperature and pressure, and the corresponding stresses result in the probabilities of occurrence being significantly reduced or eliminated, and ~~in~~ minimal in consequences. These deviations from DBA analysis assumptions and design requirements during shutdown conditions are allowed by the LCO for required systems.

ACTIONS

LCO 3.0.3 is not applicable while in MODE 5 or 6. However, since irradiated fuel assembly movement can occur in MODE 1, 2, 3, or 4, the ACTIONS have been modified by a Note stating that LCO 3.0.3 is not applicable. If moving irradiated fuel assemblies while in MODE 5 or 6, LCO would not specify an action. If moving irradiated fuel assemblies while in MODE 1, 2, 3, or 4, the fuel movement is independent of reactor operations. Entering LCO 3.0.3, while in MODE 1, 2, 3, or 4 would require the unit to be shutdown unnecessarily.

A.1, A.12.1, A.12.2, A.12.3, A.12.4, and A.12.5

If two trains are required by LCO 3.8.10, "Distribution Systems -Shutdown," the remaining OPERABLE inverters may be capable of supporting sufficient required features to allow continuation of CORE ALTERATIONS, fuel movement [involving handling recently irradiated fuel], and operations with a potential for positive reactivity additions that could result in loss of required SDM (MODE 5) or boron concentration (MODE 6). With the required inverter inoperable, there may be insufficient capability to mitigate the consequences of a fuel handling accident. Therefore, conservative actions must be taken (i.e., to suspend CORE ALTERATIONS, movement of irradiated fuel assemblies, and operations involving positive reactivity additions that could result in loss of required SDM (MODE 5) or boron concentration (MODE 6)).—Suspending positive reactivity additions that could result in failure to meet the minimum SDM or boron concentration limit is required to assure continued safe operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than that which would be required in the RCS for minimum SDM or refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical operation. Introduction of temperature changes including temperature increases when operating with a positive MTC must also be evaluated to ensure they do not result in a loss of required SDM.

Suspension of these activities shall not preclude completion of actions to establish a safe conservative condition. These actions minimize the probability of the occurrence of a fuel handling accident. It is further required to immediately initiate action to restore the required inverter and to continue this action until restoration is accomplished in order to provide the necessary inverter power to the unit safety systems.

Notwithstanding performance of the above conservative Required Actions, a required low temperature overpressure protection (LTOP) system feature may be inoperable. In this case, Required Actions A.12.1 through A.12.4 do not adequately address the concerns relating to LTOP. Pursuant to LCO 3.0.6, the LTOP ACTIONS would not be entered. Therefore, Required Action A.12.5 is provided to direct entry into the appropriate LTOP Conditions and Required Actions, which results in taking the appropriate LTOP actions.

The Completion Time of immediately is consistent with the required times for actions requiring prompt attention. The restoration of the required inverter should be completed as quickly as possible in order to minimize the time the unit safety systems may be without power or powered from the alternate AC source.

B 3.8 ELECTRICAL POWER SYSTEMS

B 3.8.10 Distribution Systems - Shutdown

BASES

BACKGROUND

A description of the AC, DC and 120 VAC vital bus electrical power distribution systems is provided in the Bases for LCO 3.8.9, "Distribution Systems - Operating."

APPLICABLE SAFETY ANALYSES

The AC, DC, and 120 VAC vital bus electrical power distribution systems are designed to provide sufficient capacity, capability, and reliability to ensure the availability of necessary power to ES systems.

The OPERABILITY of the minimum AC, DC, and 120 VAC vital bus electrical power distribution subsystems during MODES 5 and 6, and during movement of irradiated fuel assemblies ensures that:

- a. The unit can be maintained in MODE 5 or 6 for extended periods;
- b. Sufficient instrumentation and control capability is available for monitoring and maintaining the unit status; and
- c. Adequate power is provided to mitigate a postulated fuel handling accident.

In MODES 5 and 6, the AC and DC electrical power distribution systems satisfy Criterion 4 of 10 CFR 50.36 (Ref. 1). During handling of irradiated fuel, the AC and DC electrical power distribution systems satisfy Criterion 3 of 10 CFR 50.36.

LCO

Various combinations of subsystems, equipment, and components are required OPERABLE by LCO 3.3.9, "Source Range Neutron Flux," LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits," LCO 3.4.7, "RCS Loops - MODE 5, Loops Filled," LCO 3.4.8, "RCS Loops - MODE 5, Loops Not Filled," LCO 3.4.11, "Low Temperature Overpressure (LTOP) Protection System," LCO 3.7.9, "Control Room Emergency Ventilation System (CREVS)," LCO 3.7.10, "Control Room Emergency Air Conditioning System (CREACS)," LCO 3.7.12, "Fuel Handling Area Ventilation System (FHAVS)," LCO 3.9.2, "Nuclear Instrumentation" (for one monitor only), LCO 3.9.4, "Decay Heat Removal (DHR) and Coolant Circulation," and LCO 3.9.5,

B 3.9 REFUELING OPERATIONS

B 3.9.2 Nuclear Instrumentation

BASES

BACKGROUND

The source range neutron flux monitors are used during refueling operations to monitor the core reactivity condition. The installed source range neutron flux monitors are part of the Nuclear Instrumentation (NI) System. These detectors are located external to the reactor vessel and detect neutrons leaking from the core. The use of temporary detectors is permitted, provided the LCO requirements are met.

The installed source range neutron flux monitor channels include fission chamber detectors. The detectors monitor the neutron flux in counts per second. The instrument range covers six decades of neutron flux. The instrumentation also provides continuous visual indication in the control room to alert operators to a significant change in neutron flux. The NI system is designed in accordance with the criteria presented in Reference 1.

APPLICABLE SAFETY ANALYSES

An OPERABLE source range neutron flux monitor is required to provide indication to alert the operator to unexpected changes in core reactivity, such as may be caused by a boron dilution accident or an improperly loaded fuel assembly (Ref. 1).

The safety analysis of the uncontrolled boron dilution accident is described in Reference 2. The analysis of the uncontrolled boron dilution accident shows that the reactor remains subcritical. The source range neutron flux monitors are not credited for boron dilution event mitigation in the safety analysis.

The source range neutron flux monitors satisfy Criterion 4 of 10 CFR 50.36 (Ref. 3).

LCO

This LCO requires one source range neutron flux monitor OPERABLE to ensure that monitoring capability is available to detect changes in core reactivity. One additional source range neutron flux monitor shall be OPERABLE during CORE ALTERATIONS. This additional requirement ensures redundant monitoring capability when positive reactivity changes are being made to the core.

The use of temporary detectors is permitted for purposes of complying with this LCO. If used, the temporary detectors should be functionally equivalent to the installed source range monitors and satisfy applicable Surveillance Requirements.

APPLICABILITY

In MODE 6, the source range neutron flux monitor must be OPERABLE to determine changes in core reactivity. There is no other direct means available to check core reactivity levels. In MODES 2, 3, 4, and 5, source range detectors and circuitry are also required to be OPERABLE by LCO 3.3.9, "Source Range Neutron Flux."

In MODE 1, the neutron flux level is above the indicated range of the monitors. Thus, they are no longer relied upon for reactivity or power level monitoring. Hence, there are no requirements on source range neutron flux monitors in MODE 1.

ACTIONS

A.1 and A.2

With only one required source range neutron flux monitor OPERABLE during CORE ALTERATIONS, redundancy has been lost. Since these instruments are the only direct means of monitoring core reactivity conditions, CORE ALTERATIONS and introduction of coolant into the RCS with boron concentration less than required to meet the minimum boron concentration of LCO 3.9.1 must be suspended immediately. Performance of Required Action A.1 shall not preclude completion of movement of a component to a safe position. Suspending positive reactivity additions that could result in failure to meet the minimum boron concentration limit is required to assure continued safe operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than what would be required in the RCS for minimum refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical operation.

B.1

With no required source range neutron flux monitor OPERABLE, action to restore a monitor to OPERABLE status shall be initiated immediately. Once initiated, action shall be continued until a source range neutron flux monitor is restored to OPERABLE status or until the Applicability is exited.

B.2

With no required source range neutron flux monitor OPERABLE, there is no direct means of detecting changes in core reactivity. However, since CORE ALTERATIONS and positive reactivity additions are not to be made in accordance with Required Actions A.1 and A.2, the core reactivity condition is stabilized until the source range neutron flux monitors are restored to an OPERABLE status. This stabilized condition is verified by performing SR 3.9.1.1 to ensure that the required boron concentration exists.

ACTIONS (continued)

B.2 (continued)

The Completion Time of once per 12 hours is sufficient to obtain and analyze a reactor coolant sample for boron concentration. The 12 hour Frequency is reasonable, considering the low probability of a change in core reactivity during this time period.

SURVEILLANCE REQUIREMENTS

SR 3.9.2.1

SR 3.9.2.1 is the performance of a CHANNEL CHECK, which is normally a comparison of the parameter indicated on one channel to a similar parameter on other channels. It is based on the assumption that instrument channels monitoring the same parameter should read approximately the same value. Significant deviations between two instrument channels could be an indication of excessive instrument drift in one of the channels or of something even more serious. Changes in fuel loading and core geometry can also result in significant differences between source range channels, but each channel should be consistent with its local conditions. When in MODE 6 with only one channel OPERABLE, a CHANNEL CHECK is still required. However, in this condition, a redundant source range instrument may not be available for comparison. The CHANNEL CHECK provides verification that the OPERABLE source range channel is energized and indicating a value consistent with current unit status.

The Frequency of 12 hours is consistent with the CHANNEL CHECK Frequency specified for the same instruments in LCO 3.3.9.

SR 3.9.2.2

SR 3.9.2.2 is the performance of a CHANNEL CALIBRATION every 18 months. This SR is modified by a Note stating that neutron detectors are excluded from the CHANNEL CALIBRATION. The CHANNEL CALIBRATION for the source range nuclear instrument is a complete check and re-adjustment of the channel, from the pre-amplifier input to the indicator. The 18 month Frequency is based on industry experience which has shown these components usually pass the Surveillance when performed at the 18 month Frequency.

REFERENCES

1. SAR, Section 1.4, GDC 13, GDC 26, GDC 28, and GDC 29.
 2. SAR, Section 14.1.2.4.
 3. 10 CFR 50.36.
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ACTIONS

A.1 and A.2

With fewer than the required loops OPERABLE, action shall be immediately initiated and continued until the DHR loop is restored to OPERABLE status or until ≥ 23 feet of water level is established above the fuel seated in the reactor vessel. When the water level is established at ≥ 23 feet above the fuel seated in the reactor vessel, the Applicability will change to that of LCO 3.9.4, and only one DHR loop is required to be OPERABLE and in operation. An immediate Completion Time is necessary due to the increased risk of operating without a large available heat sink.

B.1

If no DHR loop is in operation or no DHR loop is OPERABLE, there will be no forced circulation to provide mixing to establish uniform boron concentrations. Suspending positive reactivity additions that could result in failure to meet the minimum boron concentration limit is required to assure continued safe operation. Introduction of coolant inventory must be from sources that have a boron concentration greater than what would be required in the RCS for minimum refueling boron concentration. This may result in an overall reduction in RCS boron concentration, but provides acceptable margin to maintaining subcritical operation.

B.2

If no DHR loop is in operation or no DHR loop is OPERABLE, actions shall be initiated immediately and continued without interruption to restore one DHR loop to OPERABLE status and operation. Since the unit is in Conditions A and B concurrently, the restoration of two OPERABLE DHR loops and one operating DHR loop should be accomplished expeditiously.

If no DHR loop is OPERABLE or in operation, alternate actions shall have been initiated immediately under Condition A to establish ≥ 23 ft of water above the top of fuel assemblies seated in the reactor vessel. Furthermore, when the LCO cannot be fulfilled, alternate decay heat removal methods, as specified in the unit's Abnormal and Emergency Operating Procedures, should be implemented. ~~This includes decay heat removal using the charging or safety injection pumps through the Chemical and Volume Control System with consideration for the boron concentration.~~ The method used to remove decay heat should be the most prudent as well as the safest choice, based upon unit conditions. The choice could be different if the reactor vessel head is in place rather than removed.