

DEC 15 1983

Docket Nos. 50-315
and 50-316

Mr. John Dolan, Vice President
Indiana and Michigan Electric Company
c/o American Electric Power Service Corporation
1 Riverside Plaza
Columbus, Ohio 43216

Dear Mr. Dolan:

It has come to our attention that a number of typographical and processing errors were made in the Licensing Amendments No. 71/53, 72, 76/57, and 77/58 for the Donald C. Cook Nuclear Plant, Unit Nos. 1 and 2. Please correct the Technical Specification pages by substituting the attached pages. These pages are as follows:

<u>Unit 1</u>		<u>Unit 2</u>	
3/4	3-12	3/4	3-11
3/4	3-14	3/4	3-13
3/4	3-26a	3/4	3-25a
3/4	7-28	3/4	7-21
3/4	7-29	B3/4	7-5
3/4	7-30	B3/4	7-6
B3/4	7-6		6-1
	6-1		6-15
	6-12		
	6-15		

Please excuse any inconvenience this may have caused.

Sincerely,

/s/David L. Wigginton

David L. Wigginton, Project Manager
Operating Reactors Branch No. 1
Division of Licensing

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PDR ADDCK 05000315
P PDR

Enclosures:
As stated

cc w/enclosures:
See attached list

OFFICE	ORB #	ORB #1	ORB #1				
SURNAME	DWigginton/jm	C Parrish	S Varga				
DATE	12/8/83	12/9/83	12/18/83				

Indiana and Michigan Electric Company

Donald C. Cook Nuclear
Plant, Units 1 and 2

cc: Mr. M. P. Alexich
Vice President
Nuclear Engineering
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Columbus, Ohio 43215

The Honorable Tom Corcoran
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Washington, DC 20515

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U.S. Environmental Protection Agency
Region V Office
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Maurice S. Reizen, M.D.
Director
Department of Public Health
Post Office Box 30035
Lansing, Michigan 48109

TABLE 4.3-1

REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>MODES IN WHICH SURVEILLANCE-REQUIRED</u>
1. Manual Reactor Trip	N.A.	N.A.	S/U(1)	N.A.
2. Power Range, Neutron Flux	S	D(2), M(3) and Q(6)	M	1, 2
3. Power Range, Neutron Flux, High Positive Rate	N.A.	R(6)	M	1, 2
4. Power Range, Neutron Flux, High Negative Rate	N.A.	R(6)	M	1, 2
5. Intermediate Range, Neutron Flux	S	R(6)	S/U(1)	1, 2 and *
6. Source Range, Neutron Flux	S	R(6)	M and S/U(1)	2(7), 3(7), 4 and 5
7. Overtemperature ΔT	S	R	M	1, 2
8. Overpower ΔT	S	R	M	1, 2
9. Pressurizer Pressure--Low	S	R	M	1, 2
10. Pressurizer Pressure--High	S	R	M	1, 2
11. Pressurizer Water Level--High	S	R	M	1, 2
12. Loss of Flow - Single Loop	S	R	M	1

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TABLE 4.3-1 (Continued)

NOTATION

- * - With the reactor trip system breakers closed and the control rod drive system capable of rod withdrawal.
- (1) - If not performed in previous 7 days.
- (2) - Heat balance only, above 15% of RATED THERMAL POWER.
- (3) - Compare incore to excore axial imbalance above 15% of RATED THERMAL POWER. Recalibrate if absolute difference \geq 3 percent.
- (4) - Manual ESF functional input check every 18 months.
- (5) - Each train tested every other month.
- (6) - Neutron detectors may be excluded from CHANNEL CALIBRATION.
- (7) - Below P-6 (BLOCK OF SOURCE RANGE REACTOR TRIP) setpoint.

TABLE 3.3-4 (Continued)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION TRIP SETPOINTS

<u>FUNCTIONAL UNIT</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUES</u>
6. MOTOR DRIVEN AUXILIARY FEEDWATER PUMPS		
a. Steam Generator Water Level -- Low-Low	\geq 17% of narrow range instrument span each steam generator	\geq 16% of narrow range instrument span each steam generator
b. 4 kv Bus Loss of Voltage	3196 volts with a 2-second delay	3196, +18, -36 volts with a $2 \pm .2$ second delay
c. Safety Injection	Not Applicable	Not Applicable
d. Loss of Main Feedwater Pumps	Not Applicable	Not Applicable
7. TURBINE DRIVEN AUXILIARY FEEDWATER PUMPS		
a. Steam Generator Water Level -- Low-Low	\geq 17% of narrow range instrument span each steam generator	\geq 16% or narrow range instrument span each steam generator
b. Reactor Coolant Pump Bus Undervoltage	\geq 2750 Volts--each bus	\geq 2725 Volts--each bus
8. LOSS OF POWER		
a. 4 kv Bus Loss of Voltage	3196 volts with a 2-second delay	3196, +18, -36 volts with a $2 \pm .2$ second delay
b. 4 kv Bus Degraded Voltage	3596 volts with a 2.0 min. time delay	3596, +36, -18 volts with a 2.0 minute \pm 6 second time delay

D. C. COOK - UNIT 1

3/4 3-26a

Amendment No. 76

PLANT SYSTEMS

3/4.7.8 SNUBBERS

LIMITING CONDITION FOR OPERATION

3.7.8 All snubbers listed in Table 3.7-4 shall be OPERABLE

APPLICABILITY: MODES 1, 2, 3 and 4. (MODES 5 and 6 for snubbers located on systems required OPERABLE in those MODES).

ACTION:

With one or more snubbers inoperable, within 72 hours replace or restore the inoperable snubber(s) to OPERABLE status and perform an engineering evaluation per Specification 4.7.8.C on the supported component or declare the supported system inoperable and follow the appropriate ACTION statement for that system.

SURVEILLANCE REQUIREMENTS

4.7.8 Each snubber shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

a. Visual Inspections

The first inservice visual inspection of snubbers shall be performed after four months but within 10 months of commencing POWER OPERATION and shall include all snubbers listed in Table 3.7-4. If less than two (2) snubbers are found inoperable during the first inservice visual inspection, the second inservice visual inspection shall be performed 12 months \pm 25% from the date of the first inspection. Otherwise, subsequent visual inspections shall be performed in accordance with the following schedule:

<u>No. Inoperable Snubbers per Inspection Period</u>	<u>Subsequent Visual Inspection Period*#</u>
0	18 months \pm 25%
1	12 months \pm 25%
2	6 months \pm 25%
3,4	124 days \pm 25%
5,6,7	62 days \pm 25%
8 or more	31 days \pm 25%

The snubbers may be categorized into two groups: Those accessible and those inaccessible during reactor operation. Each group may be inspected independently in accordance with the above schedule.

*The inspection interval shall not be lengthened more than one step at a time.

#The provisions of Specification 4.0.2 are not applicable.

SURVEILLANCE REQUIREMENTS (Continued)b. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specifications 4.7.8.d However, when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

c. Functional Tests

At least once per 18 months during shutdown, a representative sample (10%) of the total of each type of snubber in use in the plant shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of Specification 4.7.8.d an additional 10% of that type of Snubber shall be functionally tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

1. The first snubber away from each reactor vessel nozzle
2. Snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.)
3. Snubbers within 10 feet of the discharge from a safety relief valve

Snubbers identified in Table 3.7-4 as "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative sample.*

*Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

In addition to the regular sample, snubbers which failed the previous functional test shall be retested during the next test period. If a spare snubber has been installed in place of a failed snubber, then both the failed snubber (if it is repaired and installed in another position) and the spare snubber shall be retested. Test results of these snubbers may not be included for the re-sampling.

If any snubber selected for functional testing either fails to lockup or fails to move, i.e., frozen in place, the cause will be evaluated and if caused by manufacturer or design deficiency all snubbers of the same design subject to the same defect shall be functionally tested. This testing requirement shall be independent of the requirements stated above for snubbers not meeting the functional test acceptance criteria.

For the snubber(s) found inoperable, an engineering evaluation shall be performed on the components which are supported by the snubber(s). The purpose of this engineering evaluation shall be to determine if the components supported by the snubber(s) were adversely affected by the inoperability of the snubber(s) in order to ensure that the supported component remains capable of meeting the designed service.

d. Hydraulic Snubbers Functional Test Acceptance Criteria

The hydraulic snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.
2. Snubber bleed, or release rate, where required, is within the specified range in compression or tension. For snubbers specifically required to not displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

e. Snubber Service Life Monitoring

A record of the service life of each snubber, the date at which the designated service life commences and the installation and maintenance records on which the designated service life is based shall be maintained as required by Specification 6.10.2.

Concurrent with the first inservice visual inspection and at least once per 18 months thereafter, the installation and maintenance records for each snubber listed in Table 3.7-4 shall be reviewed to verify that the indicated service life has not been exceeded or will not be exceeded prior to the next scheduled snubber service life review. If the indicated service life will be exceeded prior to the next scheduled snubber service life review, the snubber service life shall be reevaluated or the snubber shall be replaced or reconditioned so as to extend its service life beyond the date of the next scheduled service life review. This reevaluation, replacement or reconditioning shall be indicated in the records.

3/4.7.6 HYDRAULIC SNUBBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure OR failure of the system on which they are installed, would have no adverse effect on any safety-related system.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results required a shorter inspection interval will override the previous schedule.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18 month intervals. Observed failures of these sample snubbers shall require functional testing of additional units.

The service life of a snubber is evaluated via manufacturer's input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc...). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

FACILITY STAFF

6.2.2 The Facility organization shall be as shown on Figure 6.2-2 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- 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.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- 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. A site Fire Brigade of at least 5 members shall be maintained onsite at all times. The fire Brigade shall not include 3 members of the minimum shift crew necessary for safe shutdown of the unit or any personnel required for other essential functions during a fire emergency.
- g. The amount of overtime worked by plant staff members performing safety-related functions must be limited in accordance with NRC Policy Statement on working hours (Generic Letter No. 82-12).

ADMINISTRATIVE CONTROLS

- m. The PROCESS CONTROL PROGRAM and implementing procedures for solidification of radioactive wastes at least once per 24 months.
- n. The performance of activities required by the Quality Assurance Program to meet the criteria of Regulatory Guide 1.21, Rev. 1, June 1974 and Regulatory Guide 4.1, Rev. 1, April 1975 at least once per 12 months.

AUTHORITY

6.5.2.9 The NSDRC shall report to and advise the Vice Chairman, Engineering and Construction, AEPSC, on those areas of responsibility specified in Sections 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of NSDRC activities shall be prepared, approved and distributed as indicated below:

- a. Minutes of each NSDRC meeting shall be prepared, approved and forwarded to the Vice Chairman, Engineering and Construction, AEPSC, within 14 days following each meeting.
- b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved and forwarded to the Vice Chairman, Engineering and Construction, AEPSC, within 14 days following completion of the review.
- c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Vice Chairman, Engineering and Construction, AEPSC, and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.
- b. Each REPORTABLE OCCURRENCE requiring 24 hour notification to the Commission shall be reviewed by the PNSRC and submitted to the NSDRC and the Chief, Nuclear Engineer.

ADMINISTRATIVE CONTROLS

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).
- c. Documentation of all challenges to the pressurizer power operated relief valves (PORVs) or safety valves.

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.

TABLE 4.3-1
REACTOR TRIP SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>MODES IN WHICH SURVEILLANCE REQUIRED</u>
1. Manual Reactor Trip	N.A.	N.A.	S/U(1)	N.A.
2. Power Range, Neutron Flux	S	D(2), M(3) and Q(6)	M	1, 2
3. Power Range, Neutron Flux, High Positive Rate	N.A.	R(8)	M	1, 2
4. Power Range, Neutron Flux, High Negative Rate	N.A.	R(6)	M	1, 2
5. Intermediate Range, Neutron Flux	S	R(6)	S/U(1)	1, 2 and *
6. Source Range, Neutron Flux	S	R(6)	M and S/U(1)	2(7), 3(7), 4 (1)
7. Overtemperature ΔT	S	R	M	1, 2
8. Overpower ΔT	S	R	M	1, 2
9. Pressurizer Pressure--Low	S	R	M	1, 2
10. Pressurizer Pressure--High	S	R	M	1, 2
11. Pressurizer Water Level--High	S	R	M	1, 2
12. Loss of Flow - Single Loop	S	R	M	1

TABLE 4.3-1 (Continued)

NOTATION

- * - With the reactor trip system breakers closed and the control rod drive system capable of rod withdrawal.
- (1) - If not performed in previous 7 days.
- (2) - Heat balance only, above 15% of RATED THERMAL POWER. Adjust channel if absolute difference > 2 percent.
- (3) - Compare incore to excore axial offset above 15% of RATED THERMAL POWER. Recalibrate if absolute difference \geq 3 percent.
- (4) - Manual ESF functional input check every 18 months.
- (5) - Each train tested every other month.
- (6) - Neutron detectors may be excluded from CHANNEL CALIBRATION.
- (7) - Below P-6 (BLOCK OF SOURCE RANGE REACTOR TRIP) setpoint.

TABLE 3.3-4 (Continued)

ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION TRIP SETPOINTS

<u>FUNCTIONAL UNIT</u>	<u>TRIP SETPOINT</u>	<u>ALLOWABLE VALUES</u>
6. MOTOR DRIVEN AUXILIARY FEEDWATER PUMPS		
a. Steam Generator Water Level -- Low-Low	≥ 21% of narrow range instrument span each steam generator	≥ 20% of narrow range instrument span each steam generator
b. 4 kv Bus Loss of Voltage	3196 volts with a 2 second delay	3196, +18, -36 volts with a 2 ± 0.2 second delay
c. Safety Injection	Not Applicable	Not Applicable
d. Loss of Main Feedwater Pumps	Not Applicable	Not Applicable
7. TURBINE DRIVEN AUXILIARY FEEDWATER PUMPS		
a. Steam Generator Water Level -- Low-Low	≥ 21% of narrow range instrument span each steam generator	≥ 20% of narrow range instrument span each steam generator
b. Reactor Coolant Pump Bus Undervoltage	≥ 2750 Volts--each bus	≥ 2725 Volts--each bus
8. LOSS OF POWER		
a. 4 kv Bus Loss of Voltage	3196 volts with a 2 second delay	3196, +18, -36 volts with a 2 ± 0.2 second delay
b. 4 kv Bus Degraded Voltage	3596 volts with a 2.0 minute time delay	3596, +36, -18 volts with a 2.0 minute ± 6 second time delay

b. Visual Inspection Acceptance Criteria

Visual inspections shall verify (1) that there are no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are secure, and (3) in those locations where snubber movement can be manually induced without disconnecting the snubber, that the snubber has freedom of movement and is not frozen up. Snubbers which appear inoperable as a result of visual inspections may be determined OPERABLE for the purpose of establishing the next visual inspection interval, providing that (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers that may be generically susceptible; and (2) the affected snubber is functionally tested in the as found condition and determined OPERABLE per Specification 4.7.7.1.d as applicable. However, when the fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be determined inoperable and cannot be determined OPERABLE via functional testing for the purpose of establishing the next visual inspection interval. All snubbers connected to an inoperable common hydraulic fluid reservoir shall be counted as inoperable snubbers.

c. Functional Tests

At least once per 18 months during shutdown, a representative sample (10%) of the total of each type of snubber in use in the plant shall be functionally tested either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of Specification 4.7.7.1.d an additional 10% of that type of snubber shall be functionally tested.

The representative sample selected for functional testing shall include the various configurations, operating environments and the range of size and capacity of snubbers. At least 25% of the snubbers in the representative sample shall include snubbers from the following three categories:

1. The first snubber away from each reactor vessel nozzle
2. Snubbers within 5 feet of heavy equipment (valve, pump, turbine, motor, etc.)
3. Snubbers within 10 feet of the discharge from a safety relief valve

Snubbers identified in Table 3.7-9 as "Especially Difficult to Remove" or in "High Radiation Zones During Shutdown" shall also be included in the representative sample.*

*Permanent or other exemptions from functional testing for individual snubbers in these categories may be granted by the Commission only if a justifiable basis for exemption is presented and/or snubber life destructive testing was performed to qualify snubber operability for all design conditions at either the completion of their fabrication or at a subsequent date.

PLANT SYSTEMS

BASES

3/4.7.6 ESP VENTILATION SYSTEM

The OPERABILITY of the ESP ventilation system ensures that radioactive materials leaking from the ECCS equipment within the pump room following a LOCA are filtered prior to reaching the environment. The operation of this system and the resultant effect on offsite dosage calculations was assumed in the accident analyses.

3/4.7.7 HYDRAULIC SNEEBERS

All snubbers are required OPERABLE to ensure that the structural integrity of the reactor coolant system and all other safety related systems is maintained during and following a seismic or other event initiating dynamic loads. Snubbers excluded from this inspection program are those installed on nonsafety-related systems and then only if their failure or failure of the system on which they are installed, would have no adverse effect on any safety-related system.

The visual inspection frequency is based upon maintaining a constant level of snubber protection to systems. Therefore, the required inspection interval varies inversely with the observed snubber failures and is determined by the number of inoperable snubbers found during an inspection. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results required a shorter inspection interval will override the previous schedule.

When the cause of the rejection of a snubber is clearly established and remedied for that snubber and for any other snubbers that may be generically susceptible, and verified by inservice functional testing, that snubber may be exempted from being counted as inoperable. Generically susceptible snubbers are those which are of a specific make or model and have the same design features directly related to rejection of the snubber by visual inspection, or are similarly located or exposed to the same environmental conditions such as temperature, radiation, and vibration.

When a snubber is found inoperable, an engineering evaluation is performed, in addition to the determination of the snubber mode of failure, in order to determine if any safety-related component or system has been adversely affected by the inoperability of the snubber. The engineering evaluation shall determine whether or not the snubber mode of failure has imparted a significant effect or degradation on the supported component or system.

PLANT SYSTEMS

BASES

To provide assurance of snubber functional reliability, a representative sample of the installed snubbers will be functionally tested during plant shutdowns at 18 month intervals. Observed failures of these sample snubbers shall require functional testing of additional units.

The service life of a snubber is evaluated via manufacturer's input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubber, seal replaced, spring replaced, in high radiation area, in high temperature area, etc...). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life. The requirements for the maintenance of records and the snubber service life review are not intended to affect plant operation.

3/4.7.8 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values.

3/4.7.9 FIRE SUPPRESSION SYSTEMS

The OPERABILITY of the fire suppression systems ensures that adequate fire suppression capability is available to confine and extinguish fires occurring in any portion of the facility where safety related equipment is located. The fire suppression system consists of the water system, spray and/or sprinklers, CO₂, Halon and fire hose stations. The collective capability of the fire suppression systems is adequate to minimize potential damage to safety related equipment and is a major element in the facility fire protection program.

In the event that one or more of the required low pressure CO₂ systems are isolated for personnel protection, to permit entry for routine tours, maintenance, construction or surveillance testing, the fire detection system(s) required by specification 3.3.3.8 shall be verified to be operable and a Roving Fire Watch Patrol established in the affected areas not occupied by workers. The Roving Fire Watch Patrol(s) shall consist of one or more persons knowledgeable of the location and operation of fire fighting equipment and good fire protection/personnel safety practices such as maintenance of access and egress routes and personnel accountability measures. The functions of the Roving Fire Watch Patrol can be fulfilled by personnel involved in

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

6.2 ORGANIZATION

OFFSITE

6.2.1 The offsite organization for facility management and technical support shall be as shown in Figure 6.2-1.

FACILITY STAFF

6.2.2 The Facility organization shall be as shown on Figure 6.2-2 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- 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.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. ALL CORE ALTERATIONS 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. A site Fire Brigade of at least 5 members shall be maintained onsite at all times. The Fire Brigade shall not include 3 members of the minimum shift crew necessary for safe shutdown of the unit or any personnel required for other essential functions during a fire emergency.
- g. The amount of overtime worked by plant staff members performing safety-related functions must be limited in accordance with the NRC Policy Statement on working hours (Generic Letter No. 82-12).

ADMINISTRATIVE CONTROLS

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).
- c. Documentation of all challenges to the pressurizer power operated relief valves (PORVs) or safety valves.

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.