

**Constellation
Nuclear**

**Nine Mile Point
Nuclear Station**

*A Member of the
Constellation Energy Group*

June 7, 2002
NMP1L 1668

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

RE: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63
TAC No. MB2441

Subject: Application for Amendment to the Technical Specifications Concerning Section 6.0, Administrative Controls – Response to Request for Additional Information

Gentlemen:

Nine Mile Point Nuclear Station, LLC (NMPNS) hereby transmits supplemental information requested by the NRC in support of a previously submitted application for amendment to Nine Mile Point Unit 1 (NMP1) Operating License DPR-63. The initial application, dated October 26, 2001, proposed to revise the format and content of Technical Specification (TS) Section 6.0, Administrative Controls, in a manner similar to the Nine Mile Point Unit 2 (NMP2) Administrative Controls section. The NMP2 TS were converted to the Improved Standard Technical Specifications (ISTS) format in License Amendment No. 91.

The supplemental information is provided in Attachments A and B to this letter to respond to the request for additional information documented in the NRC's letter dated April 4, 2002. In addition, to aid the NRC staff in completing their review of the proposed changes, Attachment C provides four tables that group the proposed TS changes by change category (i.e., Administrative (A), More Restrictive (M), Less Restrictive (L), and Relocated (R)). The change categories were previously defined in the October 26, 2001 submittal. These tables provide a summary description of the proposed changes to the Current TS (CTS), the specific CTS that are being changed, and the specific Revised TS that incorporate the changes. This supplemental information does not affect the No Significant Hazards Consideration analysis provided in the October 26, 2001 submittal.

Pursuant to 10 CFR 50.91(b)(1), NMPNS has provided a copy of this supplemental information to the appropriate state representative.

A001

Page 2
NMP1L 1668

I declare under penalty of perjury that the foregoing is true and correct. Executed on
June 7, 2002.

Very truly yours,


John T. Conway
Site Vice President

JTC/DEV/jm
Attachments

cc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR (2 copies)
Mr. J. P. Spath
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286 Washington Avenue Ext.
Albany, NY 12203-6399
Records Management

ATTACHMENT A

NINE MILE POINT NUCLEAR STATION, LLC

LICENSE NO. DPR-63

DOCKET NO. 50-220

**RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION (RAI)
DOCUMENTED IN NRC LETTER DATED APRIL 4, 2002**

RAI

The licensee's application proposed to revise Section 6.0, "Administrative Controls," of the Nine Mile Point Nuclear Station, Unit No. 1, Technical Specifications (TSs). In the NRC staff's judgment, the proposed amendment is in fact a conversion of Section 6.0 of the TSs to the Improved Standard Technical Specifications (ISTS) format.

In accordance with Nuclear Energy Institute (NEI)-9606, "NEI Improved Technical Specifications Conversion Guidance," dated August 1996, the attachments to an ISTS conversion application for each chapter should include the following:

- 1. A reprinted copy of the proposed TS in the ISTS format;*
- 2. Marked-up pages of the current Technical Specifications to show the proposed changes;*
- 3. Discussion of the proposed changes of the current TS;*
- 4. Marked-up pages of the ISTS and Bases to show the proposed changes;*
- 5. Justification for differences between the proposed changes and the ISTS;*
- 6. Proposed no significant hazards consideration determination for the changes.*

The October 26, 2001, application is lacking Items 4 (excluding Bases) and 5. These items need to be provided before the review can be completed.

In addition, NEI-9606 specifies that electronic files be provided in WordPerfect 5.1 on diskettes which contain discussions of the changes and justification for differences between the ISTS and the proposed new improved TS.

Response

Attachment B provides annotated pages of Section 5.0 of the ISTS to indicate deviations between the ISTS and the proposed NMP1 Revised TS. For consistency with the October 26, 2001 license amendment application and with Nine Mile Point Unit 2 TS Section 5.0, the ISTS version used as the basis for the annotation is NUREG-1434, Revision 1. Justifications for each

of the deviations are provided for each individual subsection of Revised TS 6.0. The annotated ISTS pages and the discussion of the deviations are cross-referenced by “clouds” that are numbered sequentially for each subsection.

Each line item in the annotated copy of the ISTS also contains a cross-reference to the equivalent NMP1 Current TS (CTS) requirement and/or discussion of change (DOC), as appropriate. This cross-reference is intended to provide reviewers with a quick reference to the equivalent CTS section.

Electronic files that contain the discussions of the changes and the justifications for differences between the ISTS and the proposed revised TS are provided separately.

ATTACHMENT B

NINE MILE POINT NUCLEAR STATION, LLC

LICENSE NO. DPR-63

DOCKET NO. 50-220

**REVISED TECHNICAL SPECIFICATION SECTION 6.0
ADMINISTRATIVE CONTROLS**

**ISTS (NUREG-1434, REVISION 1) MARKUP
AND
JUSTIFICATION FOR DEVIATIONS**

<CTS>

TSTF-65 Reviewer's
Note not shown

Responsibility

1-6-8.1

6.0 ADMINISTRATIVE CONTROLS

6.1 Responsibility

4
Not addressed in the UFSAR
or Technical Specifications,

<6.1.1>
<6.5.2.3>
<6.5.2.5>

6.1.1

TSTF-65

manager

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

The Plant Superintendent or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.

Station

- Nuclear

The Shift Supervisor (SS) shall be responsible for the control room command function. During any absence of the SS from the control room while the unit is in ~~MODE 1, 2, or 3~~, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the SS from the control room while the unit is in ~~MODE 4 or 5~~, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

Senior Reactor Operator

<6.1.2>
<Doc M.1>

6.1.2

the cold shutdown
or refueling conditions

the power operating or
hot shutdown conditions

JUSTIFICATION FOR DEVIATIONS FROM NUREG-1434, REVISION 1
REVISED TS 6.1 - RESPONSIBILITY

1. The Administrative Controls portion of the NMP1 Revised Technical Specifications (TS) continues to be identified as Section 6.0, and all subsection numbers begin with "6" rather than "5," to be compatible with the remainder of the NMP1 Current TS (CTS).
2. The brackets have been removed and the proper plant specific information has been provided.
3. Typographical or grammatical correction/revision.
4. The text "not addressed in the UFSAR or Technical Specifications" has been added to Revised TS 6.1.1 to clarify when this approval is required. If a test or experiment is already defined in the UFSAR or TS, it is not necessary to obtain the plant manager's approval since the safety concerns have already been addressed. This is consistent with current licensing basis.
5. The reference to "MODE 1, 2, or 3" is replaced with "the power operating or hot shutdown conditions," and the reference to "MODE 4 or 5" is replaced with "the cold shutdown or refueling conditions." These changes are consistent with the reactor operating conditions defined in NMP1 CTS 1.0, "Definitions."
6. The TSTF-65 reviewer's note has been deleted. This information is for the NRC reviewer to be keyed in to what is needed to meet the TSTF-65 allowance. This is not meant to be retained in the final version of the plant-specific submittal.
7. The NMP1 CTS page numbering is retained. The Administrative Controls portion of the Revised TS begins on Page 347, with subsequent pages numbered sequentially.

<CTS>

6.0 ADMINISTRATIVE CONTROLS

6.2 Organization

The functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions shall be documented in procedures.

<6.2.1> 6.2.1

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 plant.

<6.2.1.a>

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 shall be documented in the FSAR.

TSTF-65
Insert 6.2.1-A
organization charts

Added for TSTF-65

QA Plan

<6.2.1.c>

The plant ~~superintendent~~ ^{manager} shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

TSTF-65

officer

TSTF-65

<6.2.1.b>

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

<6.2.1.d>

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.

radiation protection

6.2.2

Unit Staff

be subject to

<T6.2-1>

The unit ~~staff~~ organization shall ~~include~~ the following:

<T6.2-1, Notes (2), (3)>

a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator

Insert 6.2.2-A

(continued)

<CTS>

and

3

INSERT 6.2.1-A

TSTF-65

<Doc
LA.1

~~including~~ the plant specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications



<LTS>

6.2 Organization

6.2.2

Unit Staff (continued)

shall be assigned for each control room from which a reactor is operating in MODES 1, 2, or 3.

Two unit sites with both units shutdown or defueled require a total of three non-licensed operators for the two units.

b. At least one licensed Reactor Operator (RO) shall be present in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

TSTF-258

<T6.2-1, Note (6)>

The Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 6.2.2.a and 6.2.2.b for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

<6.2.2.d, "x" footnote>

A Health Physics Technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

of on-duty personnel

<6.2.2.h>

Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed SROs, licensed ROs, health physicists, auxiliary operators, and key maintenance personnel).

An individual qualified to implement radiation protection procedures

radiation protection technician

TSTF-65

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work an [8 or 12] hour day, nominal 40 hour week, while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

Key radiation protection personnel

TSTF-258

(continued)

<CTS>

INSERT 6.2.2-A

4

Table
6.2-1,
Notes
(2), (3)

At least two non-licensed operators shall be assigned when the unit is in the power operating condition; and at least one non-licensed operator shall be assigned when the unit is in the hot shutdown, cold shutdown, or refueling conditions. In addition, if the process computer is out of service for greater than 8 hours, at least three non-licensed operators shall be assigned when the unit is in the power operating, hot shutdown, cold shutdown, or refueling conditions.

INSERT 6.2.2-B

TSTF-258

<DOC
LA.6>

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.

INSERT 6.2.2-C

TSTF-258

<DOC
LA.6>

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned.

JUSTIFICATION FOR DEVIATIONS FROM NUREG-1434, REVISION 1
REVISED TS 6.2 - ORGANIZATION

1. The Administrative Controls portion of the NMP1 Revised Technical Specifications (TS) continues to be identified as Section 6.0, and all subsection numbers begin with "6" rather than "5," to be compatible with the remainder of the NMP1 Current TS (CTS).
2. The brackets have been removed and the proper plant specific information has been provided.
3. Typographical or grammatical correction/revision.
4. Since NMP1 is a single unit, the non-licensed operator requirements have been revised for clarity. Also, the bracketed information regarding dual units has been deleted.
5. The referenced requirement is a Specification, not a CFR requirement; therefore, the word "Specification" has been added to clearly state that "6.2.2.a" is a Specification. In addition, the ISTS reference to Specification 5.2.2.g has been deleted since ISTS 5.2.2.g only describes the Shift Technical Advisor (STA) qualifications, not that an STA is part of the shift crew composition or the reactor operating conditions when the STA is required.
6. The words "of on-duty personnel" have been added to Revised TS 6.2.2.c for consistency with a similar statement in Revised TS 6.2.2.b.
7. The STA provides advisory technical support to all members of the shift crew, including the Station Shift Supervisor (SSS) and the Assistant Station Shift Supervisor (ASSS) (i.e., the NUREG-1434 Shift Supervisor position). In addition, the STA position may be filled by the ASSS (provided the ASSS meets the appropriate requirements). To provide a more generic, but technically accurate, statement as to whom the STA provides technical support, the term "Shift Supervisor" has been replaced with "shift supervision."
8. The proper plant-specific department description has been provided in Revised TS 6.2.1.d and Revised TS 6.2.2.d.
9. Plant-specific wording preference or item numbering that is consistent with the NMP1 CTS.

①-⑥-③

<CTS>

5.0 ADMINISTRATIVE CONTROLS

6.3 Unit Staff Qualifications

Reviewer's Note: Minimum qualifications for members of the unit staff shall be specified by use of an overall qualification statement referencing an ANSI Standard acceptable to the NRC staff or by specifying individual position qualifications. Generally, the first method is preferable; however, the second method is adaptable to those unit staffs requiring special qualification statements because of unique organizational structures.

<6.3.1>

6.3.1

Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 2, 1987, or more recent revisions, or ANSI Standard acceptable to the NRC staff]. The staff not covered by [Regulatory Guide 1.8] shall meet or exceed the minimum qualifications of [Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff].

Insert 6.3.1-A

Insert 6.3.2-A

TSTF-258

<Doc M.1>

<LTS>

INSERT 6.3.1-A

3

<6.3.1> ANSI N18.1-1971 for comparable positions, except for; the Manager Operations who, in lieu of meeting the senior reactor operator license requirements of ANSI N18.1-1971, shall 1) hold a senior reactor operator license at the time of appointment, or 2) have held a senior reactor operator license at Nine Mile Point Nuclear Station Unit 1 or at a similar unit, or 3) have been certified for equivalent senior reactor operator knowledge; and the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.

INSERT 6.3.2-A

TSTF - 258

<Doc
M.1>

6.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (~~SRO~~) and a licensed reactor operator (~~RO~~) are those individuals who, in addition to meeting the requirements of ~~6.3.1~~, perform the functions described in 10 CFR 50.54(m).

Specification

4

6

1

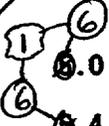
4

4

JUSTIFICATION FOR DEVIATIONS FROM NUREG-1434, REVISION 1
REVISED TS 6.3 – UNIT STAFF QUALIFICATIONS

1. The Administrative Controls portion of the NMP1 Revised Technical Specifications (TS) continues to be identified as Section 6.0, and all subsection numbers begin with “6” rather than “5,” to be compatible with the remainder of the NMP1 Current TS (CTS).
2. The bracketed “Reviewer’s Note” has been deleted. This information is for the NRC reviewer to be keyed into what is needed to meet this requirement. This is not meant to be retained in the final version of the plant-specific submittal.
3. The brackets have been removed and the proper plant specific information has been provided. The requirements stated for the Manager Operations are consistent with the current licensing basis, as approved by the NRC in License Amendment No. 160.
4. Plant-specific wording preference that is consistent with the NMP1 CTS.

<CTS>



⑤.0 ADMINISTRATIVE CONTROLS

⑤.4 Procedures

and administrative policies ⑤

<6.8.1>



6.4.1

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

<6.8.1>

<Doc A.2>

<Doc M.1>

a. The applicable procedures recommended in Regulatory Guide 1.33, ~~Revision 2~~, Appendix A, ~~February 1979~~; November 3, 1972

b. The emergency operating procedures required to implement the requirements of NUREG-0737 and ~~to~~ NUREG-0737, Supplement 1, as stated in ~~Generic Letter 82-338~~;

<Doc M.1>

c. Quality assurance for effluent and environmental monitoring;

<6.8.1.a>

<Doc M.1>

d. Fire Protection Program implementation; and

e. All programs specified in Specification ⑤.5.

that meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972 and

JUSTIFICATION FOR DEVIATIONS FROM NUREG-1434, REVISION 1
REVISED TS 6.4 – PROCEDURES

1. The Administrative Controls portion of the NMP1 Revised Technical Specifications (TS) continues to be identified as Section 6.0, and all subsection numbers begin with “6” rather than “5,” to be compatible with the remainder of the NMP1 Current TS (CTS).
2. The brackets have been removed and the proper plant specific information has been provided.
3. Typographical or grammatical correction/revision.
4. These words have been added for clarity to ensure that this program is not confused with the environmental monitoring program.
5. The term “administrative policies” and the requirement to “meet or exceed the requirements and recommendations of Sections 5.1 and 5.3 of ANSI N18.7-1972” have been added consistent with the current licensing basis.
6. The referenced version of Regulatory Guide 1.33 has been changed consistent with the current licensing basis.

< CTS >

- 1 6.0 ADMINISTRATIVE CONTROLS
- 1 6.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

1 6.5.1

Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification [5.6.2] and Specification [5.6.3].

< 6.9.1.e >

~~Licensee initiated~~ changes to the ODCM

Insert 6.5.1-A

- a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - 1. sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
 - 2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- b. Shall become effective after review and acceptance by the [onsite review function] and the approval of the [Plant Superintendent]; and
- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of, or concurrent with, the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made.

(continued)

<CTS>

INSERT 6.5.1-A

5

shall be reported to the Commission in the Semiannual Radioactive Effluent Release Report for the period in which the change(s) was made effective. This submittal shall contain:

<6.9.1.e>

- a. Sufficiently detailed information to totally support the rationale for the change without benefit of additional or supplemental information. Information submitted should consist of a package of those pages of the Offsite Dose Calculation Manual to be changed, together with appropriate analyses or evaluations justifying the change(s);
- b. A determination that the change will not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
- c. Documentation of the fact that the change has been reviewed and found acceptable.

<CTS>

1 6.5 Programs and Manuals

<6.9.1.e>

6.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

5 Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

<6.14>

6.5.2 Primary Coolant Sources Outside Containment

<Doc A.3>

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 systems include [the Low

3 Insert 6.5.2-A

Pressure Core Spray, High Pressure Core Spray, Residual Heat Removal, Reactor Core Isolation Cooling, hydrogen recombiner, process sampling, and Standby Gas Treatment]. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

4 Insert 6.5.2-B

6 b. ~~integrated~~ ^{System} leak test requirements for each system at ~~refueling cycle~~ intervals ~~or less~~. ^{24 month} 4

5.5.3 Post Accident Sampling

7 This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, 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; and
- c. Provisions for maintenance of sampling and analysis equipment.

5.5.4 Radioactive Effluent Controls Program

8 This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of

(continued)

<CTS>

INSERT 6.5.2-A

3

<Doc
A.3 >

Core Spray, Containment Spray, Emergency Cooling, Shutdown Cooling, Reactor Cleanup, Vacuum Relief, Reactor Water Sampling, Containment Atmosphere Dilution (CAD) H₂O₂ Monitor, Drywell Containment Atmosphere Monitoring (CAM), Post Accident Sampling, Radioactive Gaseous Effluent Monitoring (RAGEMS), Offgas Effluent Stack Monitoring (OGESMS), and Post Accident Vent to Reactor Building Emergency Ventilation.

INSERT 6.5.2-B

4

<Doc
A.4 >

The provisions of Specification 4.0.1 are applicable to the 24 month frequency for performing system leak test activities.

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⑥
5.5 Programs and Manuals5.5.4 Radioactive Effluent Controls Program (continued) ⑧

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 10 CFR 20, Appendix B, Table 2, Column 2;
- 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 and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the 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 to areas beyond the site boundary conforming to the dose associated with 10 CFR 20, Appendix B, Table 2, Column 1;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each

(continued)

<CTS>

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;

- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

5.5.5 Component Cyclic or Transient Limit

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

5.5.6 Pre-Stressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial operations. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with [Regulatory Guide 1.35, Revision 3, 1989].

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.

5.5.7 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports. The program shall include the following:

(continued)

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⑥
5.5

①-⑥-5.5

5.5 Programs and Manuals

5.5.7 Inservice Testing Program (continued)

a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as follows:

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

Required Frequencies for performing inservice testing activities

Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities;

c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and

d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS.

⑫

5.5.8 Ventilation Filter Testing Program (VFIP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in [Regulatory Guide], and in accordance with [Regulatory Guide 1.52, Revision 2; ASME N510-1989; and AG-1].

a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < [0.05] % when tested in

⑬

(continued)

<CTS>

①
⑥
⑤.5

①-⑥-⑤.5

5.5 Programs and Manuals

5.5.8 Ventilation Filter Testing Program (VFTP) (continued)

accordance with [Regulatory Guide 1.52, Revision 2, and ASME N510-1989] at the system flowrate specified below [$\pm 10\%$]:

ESF Ventilation System

Flowrate

[]

[]

- b. Demonstrate for each of the ESF systems that an in-place test of the charcoal adsorber shows a penetration and system bypass < [0.05]% when tested in accordance with [Regulatory Guide 1.52, Revision 2, and ASME N510-1989] at the system flowrate specified below [$\pm 10\%$]:

ESF Ventilation System

Flowrate

[]

[]

- c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in [Regulatory Guide 1.52, Revision 2], shows the methyl iodide penetration less than the value specified below when tested in accordance with [ASTM D3803-1989] at a temperature of \leq [30°C] and greater than or equal to the relative humidity specified below:

ESF Ventilation System

Penetration

RH

[]

[]

[]

Reviewer's Note: Allowable penetration = [100% - methyl iodide efficiency for charcoal credited in staff safety evaluation] / (safety factor).

Safety factor = [5] for systems with heaters.
 = [7] for systems without heaters.

(continued)

<CTS>

5.5 Programs and Manuals

5.5.8 Ventilation Filter Testing Program (VFTP) (continued) 13

d. Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the value specified below when tested in accordance with [Regulatory Guide 1.52, Revision 2, and ASME N510-1989] at the system flowrate specified below [$\pm 10\%$]:

ESF Ventilation System	Delta P	Flowrate
<input type="text"/>	<input type="text"/>	<input type="text"/>

e. Demonstrate that the heaters for each of the ESF systems dissipate the value specified below [$\pm 10\%$] when tested in accordance with [ASME N510-1989]:

ESF Ventilation System	Wattage
<input type="text"/>	<input type="text"/>

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

5.5.9 Explosive Gas and Storage Tank Radioactivity Monitoring Program 14

This program provides controls for potentially explosive gas mixtures contained in the [Waste Gas Holdup System], [the quantity of radioactivity contained in gas storage tanks or fed into the offgas treatment system, and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks]. The gaseous radioactivity quantities shall be determined following the methodology in [Branch Technical Position (BTP) ETSB 11-5, "Postulated Radioactive Release due to Waste Gas System Leak or Failure"]. The liquid radwaste quantities shall be determined in accordance with [Standard Review Plan, Section 15.7.3, "Postulated Radioactive Release due to Tank Failures"].

(continued)

<CTS>

⑥
①
5.5 Programs and Manuals5.5.9 Explosive Gas and Storage Tank Radioactivity Monitoring Program
(continued) ⑭

The program shall include:

- a. The limits for concentrations of hydrogen and oxygen in the [Waste Gas Holdup System] and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion);
- b. A surveillance program to ensure that the quantity of radioactivity contained in [each gas storage tank and fed into the offgas treatment system] is less than the amount that would result in a whole body exposure of ≥ 0.5 rem to any individual in an unrestricted area, in the event of [an uncontrolled release of the tanks' contents]; and
- c. A surveillance program to ensure that the quantity of radioactivity contained in all outdoor liquid radwaste tanks that are not surrounded by liners, dikes, or walls, capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the [Liquid Radwaste Treatment System] is less than the amount that would result in concentrations less than the limits of 10 CFR 20, Appendix B, Table 2, Column 2, at the nearest potable water supply; and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

5.5.10 Diesel Fuel Oil Testing Program ⑮

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

(continued)

<CTS>

5.5 Programs and Manuals

1-6-9.5

5.5.10 Diesel Fuel Oil Testing Program (continued)

15

- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
 - 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,
 - 3. a clear and bright appearance with proper color;
- b. Other properties for ASTM 2D fuel oil are within limits within 31 days following sampling and addition to storage tanks; and
- c. Total particulate concentration of the fuel oil is ≤ 10 mg/l when tested every 31 days in accordance with ASTM D-2276, Method A-2 or A-3.

1-6-3-2
5.5.1

Technical Specifications (TS) Bases Control Program

<Doc M.1>

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. change in the TS incorporated in the license; or
- 2. change to the updated FSAR or Bases that involves an unreviewed safety question as defined in 10 CFR 50.59.

TSTF-364

TSTF-364

requires NRC approval pursuant to

- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.
- d. Proposed changes that meet the criteria of 5.5.10b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without

(continued)

<CTS>

① ⑤.5 Programs and Manuals

② ③ ④ ⑤.5

Technical Specifications (TS) Bases Control Program (continued)

<Doc M.1>

prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

5.5.12 Safety Function Determination Program (SFDP)

⑬

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate limitations and remedial or compensatory actions may be identified to be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6. The SFDP shall contain the following:

- a. Provisions for cross division checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected;
- b. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists;
- c. Provisions to ensure that an inoperable supported system's Completion Time is not inappropriately extended as a result of multiple support system inoperabilities; and
- d. Other appropriate limitations and remedial or compensatory actions.

A loss of safety function exists when, assuming no concurrent single failure, a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:

- a. A required system redundant to system(s) supported by the inoperable support system is also inoperable; or
- b. A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable; or

(continued)

<CTS>



6.5 Programs and Manuals

5.5.12 Safety Function Determination Program (SFDP) (continued) 16

c. A required system redundant to support system(s) for the supported systems (a) and (b) above is also inoperable.

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

<6.11>

Insert 6.5.5-A 18

<6.16>

Insert 6.5.4-A 17

<CTS>

INSERT 6.5.4-A

17

<6.16>

6.5.4 10 CFR 50 Appendix J Testing Program Plan

- a. A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, entitled "Performance-Based Containment Leak-Test Program," dated September 1995 with the following exceptions:
 1. Type A tests will be conducted in accordance with ANSI/ANS 56.8-1994 and/or Bechtel Topical Report BN-TOP-1, and
 2. The first Type A test following approval of this Specification will be a full pressure test conducted approximately 70, rather than 48, months since the last low pressure Type A test.
- b. The peak calculated containment internal pressure (Pac) for the design basis loss of coolant accident is 35 psig.
- c. The maximum allowable primary containment leakage rate (La) at Pac shall be 1.5% of primary containment air weight per day.
- d. Leakage Rate Surveillance Test acceptance criteria are:
 1. The as-found Primary Containment Integrated Leak Rate Test (Type A Test) acceptance criteria is less than 1.0 La.
 2. The as-left Primary Containment Integrated Leak Rate Test (Type A Test) acceptance criteria is less than or equal to 0.75 La, prior to entering a mode of operation where containment integrity is required.
 3. The combined Local Leak Rate Test (Type B & C Tests including airlocks) acceptance criteria is less than 0.6 La, calculated on a maximum pathway basis, prior to entering a mode of operation where containment integrity is required.
 4. The combined Local Leak Rate Test (Type B & C Tests including airlocks) acceptance criteria is less than 0.6 La, calculated on a minimum pathway basis, at all times when containment integrity is required.
- e. The provisions of Specification 4.0.1 do not apply to the test frequencies specified in the 10 CFR 50 Appendix J Testing Program Plan.

INSERT 6.5.5-A

<CTS>

<6.11> 6.5.5 Radiation Protection Program

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

JUSTIFICATION FOR DEVIATIONS FROM NUREG-1434, REVISION 1
REVISED TS 6.5 – PROGRAMS AND MANUALS

1. The Administrative Controls portion of the NMP1 Revised Technical Specifications (TS) continues to be identified as Section 6.0, and all subsection numbers begin with “6” rather than “5,” to be compatible with the remainder of the NMP1 Current TS (CTS).
2. Typographical or grammatical correction/revision.
3. The brackets have been removed and the proper plant specific information has been provided.
4. The surveillance frequency has been changed from “refueling cycle intervals” to “24 months,” consistent with the current NMP1 refueling interval. In addition, since normal Surveillance Requirements in the LCO Sections allow a 25% extension of the frequency per CTS 4.0.1, this allowance has also been added for this Surveillance Requirement. In addition, the term “or less” is unnecessary and has been deleted for consistency.
5. Paragraphs a and b of ISTS 5.5.1 that describe the contents of the Offsite Dose Calculation Manual (ODCM) have not been incorporated as part of this submittal. Paragraphs a, b, and c of ISTS 5.5.1 that describe requirements for changes to the ODCM have been replaced with the plant specific information from NMP1 CTS 6.9.1.e. Proposed revisions to the ODCM specification that are consistent with ISTS 5.5.1 are described and evaluated in a separate license amendment request (letter no. NMP1L 1617 dated October 19, 2001).
6. The word “integrated” has been replaced with the word “system” as related to leak test requirements. This terminology is consistent with the NMP1 response to NUREG-0578 Item 2.1.6.a that was documented in a Niagara Mohawk Power Corporation (NMPC) letter dated December 31, 1979 and accepted by the NRC in the safety evaluation for License Amendment No. 42 (NRC letter dated April 13, 1981).
7. TS requirements for a post accident sampling program (ISTS 5.5.3) are not part of the NMP1 current licensing basis, and this submittal does not propose to add such requirements. Confirmatory Orders issued by the NRC on March 14, 1983 and on June 12, 1984 contain requirements pertaining to NMP1 post accident sampling capability. Controls that ensure the capability to obtain and analyze liquid and gaseous samples under accident conditions are contained in plant procedures. Topics covered in these procedures include sampling and analysis, maintenance of sampling and analysis equipment, and training of personnel. Established change control processes will provide sufficient control of changes to these procedures. Therefore, administrative controls relating to the post accident sampling program are not required to be added to the NMP1 TS to provide adequate protection of the public health and safety.
8. The Radioactive Effluent Controls Program specification of ISTS 5.5.4 has not been adopted as part of this submittal. The proposed addition of this program to the NMP1 TS is described and evaluated in a separate license amendment request (letter no. NMP1L 1617 dated October 19, 2001).

JUSTIFICATION FOR DEVIATIONS FROM NUREG-1434, REVISION 1
REVISED TS 6.5 – PROGRAMS AND MANUALS

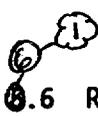
9. The proper plant-specific information/nomenclature has been provided.
10. TS requirements for a component cyclic or transient limit program (ISTS 5.5.5) are not part of the NMP1 current licensing basis, and this submittal does not propose to add such requirements. Controls to track the UFSAR Table V-2 cyclic and transient occurrences are contained in plant procedures. Established change control processes will provide sufficient control of changes to these procedures. Therefore, administrative controls relating to the component cyclic or transient limit program are not required to be added to the NMP1 TS to provide adequate protection of the public health and safety.
11. This bracketed requirement has been deleted because it is not applicable to NMP1 (NMP1 does not have a prestressed concrete containment).
12. The Inservice Testing Program specification of ISTS 5.5.7 has not been adopted as part of this submittal. Inservice inspection and testing requirements currently reside in TS 3/4.2.6. The proposed deletion of TS 3/4.2.6, and the addition of an Inservice Testing Program specification to the Administrative Controls portion of the NMP1 TS, are described and evaluated in a separate license amendment request (letter no. NMP1L 1628 dated November 26, 2001).
13. The Ventilation Filter Testing Program (VFTP) specification of ISTS 5.5.8 has not been adopted as part of this submittal. The requirements for testing of engineered safeguards ventilation filter systems currently reside in TS 3/4.4.4 for the Reactor Building Emergency Ventilation System (RBEVS) and in TS 3/4.4.5 for the Control Room Air Treatment System (CRATS). This submittal is not converting either the Limiting Conditions for Operation or the Surveillance Requirements portions of the NMP1 TS to the ITS format and content; therefore, the ventilation filter testing requirements are retained in their existing TS sections rather than relocating them to the Administrative Controls portion of the TS.
14. The Explosive Gas and Storage Tank Radioactivity Monitoring Program specification of ISTS 5.5.9 has not been adopted as part of this submittal. The proposed addition of this program to the NMP1 TS is described and evaluated in a separate license amendment request (letter no. NMP1L 1617 dated October 19, 2001).
15. TS requirements for a diesel fuel oil testing program (ISTS 5.5.10) are not part of the NMP1 current licensing basis, and this submittal does not propose to add such requirements. Requirements for testing of both new diesel fuel oil and stored fuel oil are contained in plant procedures. These procedures include sampling and testing requirements and acceptance criteria that are in accordance with applicable ASTM standards. Established change control processes will provide sufficient control of changes to these procedures. Therefore, administrative controls relating to the diesel fuel oil testing program are not required to be added to the NMP1 TS to provide adequate protection of the public health and safety.

JUSTIFICATION FOR DEVIATIONS FROM NUREG-1434, REVISION 1
REVISED TS 6.5 – PROGRAMS AND MANUALS

16. The Safety Function Determination Program (SFDP) specification of ISTS 5.5.12 has not been adopted as part of this submittal. An evaluation in accordance with the SFDP is to be performed upon entry into ISTS LCO 3.0.6. The NMP1 TS do not currently contain a specification analogous to ISTS LCO 3.0.6. This submittal is not converting either the Limiting Conditions for Operation or the Surveillance Requirements portions of the TS to the ITS format and content; therefore, a specification analogous to ISTS LCO 3.0.6 and the associated SFDP specification are not proposed to be added to the NMP1 TS.
17. The 10 CFR 50 Appendix J Testing Program (CTS 6.16) has been added to be consistent with the current licensing basis and TSTF-52.
18. The Radiation Protection Program (CTS 6.11) has been added to be consistent with the current licensing basis. The proposed relocation of these program requirements to the UFSAR is described and evaluated in a separate license amendment request (letter no. NMP1L 1617 dated October 19, 2001).



<CTS>



8.6 Reporting Requirements

<6.9.1.d>



Annual Radiological Environmental Operating Report (continued)

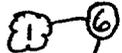
(ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

Offsite Dose Calculation Manual

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. [The report shall identify the TLD results that represent collocated dosimeters in relation to the NRC TLD program and the exposure period associated with each result.] In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

Insert 6.6.2-B

Insert 6.6.2-C



Semi-annual Radioactive Effluent Release Report

<6.9.1.e>

NOTE: A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

Routine during the previous 6 months of operation

Radioactive Effluent Release Reports. The Radioactive Effluent Release Report covering the operation of the unit shall be submitted in accordance with 10 CFR 50.36a. The reports shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

Insert 6.6.3-A

Insert 6.6.3-B



Monthly Operating Reports

within 60 days after January 1 and July 1 of each year. The period of the first report shall begin on January 1, 1985.

<6.9.1.c>

Routine reports of operating statistics and shutdown experiences including documentation of all challenges to the safety/relief

TSTF-258 (continued)

< CTS >

INSERT 6.6.2-A

6

< 6.9.1.d >

including a comparison with operational controls as appropriate, and with environmental surveillance reports from the previous 5 years, and an assessment of the observed impacts of the plant operation on the environment. The reports shall also include the results of land use censuses required by Specification 3.6.22.

INSERT 6.6.2-B

6

< 6.9.1.d >

The reports shall also include the following: a summary description of the radiological environmental monitoring program; at least two legible maps ** covering all sampling locations keyed to a table giving distances and directions from the centerline of one reactor; the results of licensee participation in the Interlaboratory Comparison Program, required by Specification 3.6.21; discussion of all deviations from the sampling schedule of Table 3.6.20-1; and discussion of all analyses in which the LLD required in Table 4.6.20-1 was not achievable.

< 6.9.1.d >

INSERT 6.6.2-C

6

(Footnote for Revised TS 6.6.2)

** One map shall cover stations near the site boundary; a second shall include the more distant stations.

<CTS>

INSERT 6.6.3-A

8

<6.9.1.e> as outlined in Regulatory Guide 1.21, "Measuring, Evaluating, and Reporting Radioactivity in Solid Wastes and Releases of Radioactive Materials in Liquid and Gaseous Effluents from Light-Water-Cooled Nuclear Power Plants," Revision 1, June 1974, with data summarized on a quarterly basis following the format of Appendix B thereof.

The Radioactive Effluent Release Report to be submitted within 60 days after January 1 of each year shall include an annual summary of hourly meteorological data collected over the previous year. This annual summary may be either in the form of an hour-by-hour listing on magnetic tape of wind speed, wind direction, and atmospheric stability, and precipitation (if measured), or in the form of joint frequency distributions of wind speed, wind direction, and atmospheric stability. * This same report shall include an assessment of the radiation doses from radioactive liquid and gaseous effluents to members of the public due to their activities inside the site boundary (Figure 5.1-1) during the report period. All assumptions used in making these assessments, i.e., specific activity, exposure time and location, shall be included in these reports. The assessment of radiation doses shall be performed in accordance with the methodology and parameters in the Offsite Dose Calculation Manual.

The Radioactive Effluent Release Report to be submitted 60 days after January 1 of each year shall also include an assessment of radiation doses to the likely most exposed member of the public from reactor releases and other nearby uranium fuel cycle sources, including doses from primary effluent pathways and direct radiation, for the previous calendar year to show conformance with 40 CFR Part 190, Environmental Radiation Protection Standards for Nuclear Power Operation. Acceptable methods for calculating the dose contribution from liquid and gaseous effluents are given in the Offsite Dose Calculation Manual.

The Radioactive Effluent Release Reports shall include the following information for each class of solid waste (as defined by 10 CFR Part 61) shipped offsite during the report period:

- a. Container volume,
- b. Total curie quantity (specify whether determined by measurement or estimate),
- c. Principal radionuclides (specify whether determined by measurement or estimate),
- d. Source of waste and processing employed (e.g., dewatered spent resin, compacted dry waste, evaporator bottoms),
- e. Type of container (e.g., LSA, Type A, Type B, Large Quantity), and
- f. Solidification agent or absorbent (e.g., cement)

The Radioactive Effluent Release Reports shall include any changes made during the reporting period to the Process Control Program (PCP) and to the Offsite Dose Calculation Manual (ODCM), as well as a listing of new locations for dose calculations and/or environmental monitoring identified by the land use census pursuant to Specification 3.6.20.

<CTS>

8

INSERT 6.6.3-B
(Footnote for Revised TS 6.6.3)

<6.9.1.c>*

In lieu of submission with the Semi-annual Radioactive Effluent Release Report, the licensee has the option of retaining this summary of required meteorological data on site in a file that shall be provided to the NRC upon request.

①-⑥-⑧.6

<CTS>

①-⑥
5.6 Reporting Requirements

<6.9.1.c>

⑥
6.6.4 Monthly Operating Reports (continued)

TSTF-258 ~~valves,~~ shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

⑥-①

⑥
6.6.5 CORE OPERATING LIMITS REPORT (COLR)

NEDE-24011-P-A, "GENERAL ELECTRIC STANDARD APPLICATION FOR REACTOR FUEL" (Latest approved revision as specified in the COLR).

<6.9.1.f>

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following: ④

Insert 6.6.5-A

~~The individual specifications that address core operating limits must be referenced here.~~ X

④

b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in ~~the following documents:~~

~~Identify the Topical Report(s) by number, title, date, and NRC staff approval document, or identify the staff Safety Evaluation Report for a plant specific methodology by NRC letter and date.~~ ④

c. The core operating limits shall be determined such that all applicable limits (e.g., fuel thermal/mechanical limits, core thermal/hydraulic limits, ~~Emergency Core Cooling Systems/ECCS~~ limits, nuclear limits such as ~~SDM~~, transient analysis limits, and accident analysis limits) of the safety analysis are met. ⑦ ⑦ ⑦

Shutdown margin

d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC. ⑦

5.6.6 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) ⑨

a. RCS pressure and temperature limits for heatup, cooldown, low temperature operation, criticality, and hydrostatic testing as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:

(continued)

<CTS>

INSERT 6.6.5-A

4

- <6.9.1.f>
- 1) The AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR) for Specifications 3.1.7.a and 3.1.7.e.
 - 2) The $K_{f\text{core}}$ flow adjustment factor for Specification 3.1.7.c.
 - 3) The MINIMUM CRITICAL POWER RATIO (MCPR) for Specifications 3.1.7.c and 3.1.7.e.
 - 4) The LINEAR HEAT GENERATION RATE for Specification 3.1.7.b.
 - 5) The Power/Flow relationship for Specifications 3.1.7.d and 3.1.7.e.

<CTS>

⑥ ①

① ⑥ ⑧.6

⑧.6 Reporting Requirements

5.6.6

Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) (continued)

⑨

[The individual specifications that address RCS pressure and temperature limits must be referenced here.]

- b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents: [Identify the NRC staff approval document by date.]
- c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

Reviewer's Notes: The methodology for the calculation of the P-T limits for NRC approval should include the following provisions:

1. The methodology shall describe how the neutron fluence is calculated (reference new Regulatory Guide when issued).
2. The Reactor Vessel Material Surveillance Program shall comply with Appendix H to 10 CFR 50. The reactor vessel material irradiation surveillance specimen removal schedule shall be provided, along with how the specimen examinations shall be used to update the PTLR curves.
3. Low Temperature Overpressure Protection (LTOP) System lift setting limits for the Power Operated Relief Valves (PORVs), developed using NRC-approved methodologies may be included in the PTLR.
4. The adjusted reference temperature (ART) for each reactor beltline material shall be calculated, accounting for radiation embrittlement, in accordance with Regulatory Guide 1.99, Revision 2.
5. The limiting ART shall be incorporated into the calculation of the pressure and temperature limit curves in accordance with NUREG-0800 Standard Review Plan 5.3.2, Pressure-Temperature Limits.

(continued)

<CTS>

5.6 Reporting Requirements

5.6.6 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) (continued)

6. The minimum temperature requirements of Appendix G to 10 CFR Part 50 shall be incorporated into the pressure and temperature limit curves.
7. Licensees who have removed two or more capsules should compare for each surveillance material the measured increase in reference temperature (RT_{NDT}) to the predicted increase in RT_{NDT} ; where the predicted increase in RT_{NDT} is based on the mean shift in RT_{NDT} plus the two standard deviation value ($2\sigma_A$) specified in Regulatory Guide 1.99, Revision 2. If the measured value exceeds the predicted value (increase in $RT_{NDT} + 2\sigma_A$), the licensee should provide a supplement to the PTLR to demonstrate how the results affect the approved methodology.

5.6.7 EDG Failure Reports

If an individual emergency diesel generator (EDG) experiences four or more valid failures in the last 25 demands, these failures and any nonvalid failures experienced by that EDG in that time period shall be reported within 30 days. Reports on EDG failures shall include the information recommended in Regulatory Guide 1.9, Revision 3, Regulatory Position C.5, or existing Regulatory Guide 1.108 reporting requirement.

5.6.8 PAM Report

When a Special Report is required by Condition B or G of LCO 3.3.[3.1], "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6.9 Tendon Surveillance Report

Any abnormal degradation of the containment structure detected during the tests required by the Pre-Stressed Concrete

(continued)

<CTS>

5.6 Reporting Requirements

1-6-5.6

5.6.9 Tendon Surveillance Report (continued)

Containment Tendon Surveillance Program shall be reported to the NRC within 30 days. The report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective action taken.

Reviewer's Note: These reports may be required covering inspection, test, and maintenance activities. These reports are determined on an individual basis for each unit and their preparation and submittal are designated in the Technical Specifications.

12

<6.9.3>

Insert 6.6.6-A

13

<CTS>

INSERT 6.6.6-A

13

<6.9.3> 6.6.6 Special Reports

Special reports shall be submitted within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. Reactor Vessel Material Surveillance Specimen Examination, Specification 4.2.2.(b) (12 months).
- b. Safety Class 1 Inservice Inspection, Specification 4.2.6 (Three months).
- c. Safety Class 2 Inservice Inspections, Specification 4.2.6 (Three months).
- d. Safety Class 3 Inservice Inspections, Specification 4.2.6 (Three months).
- e. Primary Containment Leakage Testing, Specification 3.3.3 (Three months).
- f. Secondary Containment Leakage Testing, Specification 3.4.1 (Three months).
- g. Sealed Source Leakage in Excess Of Limits, Specification 3.6.5.2 (Three months).
- h. Calculate Dose from Liquid Effluent in Excess of Limits, Specification 3.6.15.a.(2)(b) (30 days from the end of the affected calendar quarter).
- i. Calculate Air Dose from Noble Gases Effluent in Excess of Limits, Specification 3.6.15.b.(2)(b) (30 days from the end of the affected calendar quarter).
- j. Calculate Dose from I-131, H-3 and Radioactive Particulates with half lives greater than eight days in Excess of Limits, Specification 3.6.15.b.(3)(b) (30 days from the end of the affected calendar quarter).
- k. Calculated Doses from Uranium Fuel Cycle Source in Excess of Limits, Specification 3.6.15.d (30 days from the end of the affected calendar year).
- l. Inoperable Gaseous Radwaste Treatment System, Specification 3.6.16.b (30 days from the event).
- m. Environmental Radiological Reports. With the level of radioactivity (as the result of plant effluents) in an environmental sampling medium exceeding the reporting level of Table 6.6.6-1, when averaged over any calendar quarter, in lieu of a Licensee Event Report, prepare and submit to the Commission within thirty (30) days from the end of the calendar quarter a special report identifying the cause(s) for exceeding the limits, and define the corrective action to be taken.

<CTS>

TABLE 6.6.6-1

REPORTING LEVEL FOR RADIOACTIVITY CONCENTRATIONS IN ENVIRONMENTAL SAMPLES

REPORTING LEVELS

Analysis	Water (pCi/l)	Airborne Particulate Or Gases (pCi/m ³)	Fish (pCi/kg, wet)	Milk (pCi/l)	Food Products (pCi/kg, wet)
H-3	20,000*				
Mn-54	1,000		30,000		
Fe-59	400		10,000		
Co-58	1,000		30,000		
Co-60	300		10,000		
Zn-65	300		20,000		
Zr-95, Nb-95	400				
I-131	2**	0.9		3	100
Cs-134	30	10.0	1,000	60	1,000
Cs-137	50	20.0	2,000	70	2,000
Ba/La-140	200			300	

* For drinking water samples. This is a 40 CFR 141 value. If no drinking water pathway exists, a value of 30,000 pCi/liter may be used.

** If no drinking water pathway exists, a value of 20 pCi/liter may be used.

<6.9.3,
T6.9.3-1>

JUSTIFICATION FOR DEVIATIONS FROM NUREG-1434, REVISION 1
REVISED TS 6.6 – REPORTING REQUIREMENTS

1. The Administrative Controls portion of the NMP1 Revised Technical Specifications (TS) continues to be identified as Section 6.0, and all subsection numbers begin with “6” rather than “5,” to be compatible with the remainder of the NMP1 Current TS (CTS).
2. The bracketed Note has been deleted since it is not applicable to NMP1 (individual reports are submitted for NMP1 and NMP2).
3. The Occupational Radiation Exposure Report specification of ISTS 5.6.1 has not been adopted as part of this submittal. The NMP1 CTS 6.9.1.b wording has been retained. Proposed revisions that are consistent with ISTS 5.6.1 are described and evaluated in a separate license amendment request (letter no. NMP1L 1617 dated October 19, 2001).
4. The brackets have been removed and the proper plant-specific information has been provided.
5. The initial report requirement in ISTS 5.6.1 is deleted since this initial report has been submitted on a one-time basis.
6. The Annual Radiological Environmental Operating Report specification of ISTS 5.6.2 has not been adopted as part of this submittal. The NMP1 CTS 6.9.1.d wording has been retained. Proposed revisions that are consistent with ISTS 5.6.2 are described and evaluated in a separate license amendment request (letter no. NMP1L 1617 dated October 19, 2001).
7. Typographical or grammatical correction/revision.
8. The Radioactive Effluent Release Report specification of ISTS 5.6.3 has not been adopted as part of this submittal. The NMP1 CTS 6.9.1.e wording has been retained. Proposed revisions that are consistent with ISTS 5.6.3 are described and evaluated in a separate license amendment request (letter no. NMP1L 1617 dated October 19, 2001).
9. The utilization of a Pressure and Temperature Limits Report (PTLR) requires the development and NRC approval of detailed methodologies for future revisions to pressure/temperature (P/T) limits. At this time NMPNS does not have the necessary methodologies submitted to the NRC for review and approval; therefore, references to the PTLR are deleted. The NMP1 specific limits and curves are provided in the P/T limits specification (CTS 3/4.2.2).
10. TS requirements for EDG Failure Reports (ISTS 5.6.7) are not part of the NMP1 current licensing basis, and this submittal does not propose to add such requirements. NMP1 has implemented a maintenance program for monitoring and maintaining diesel generator performance in accordance with the provisions of the maintenance rule and consistent with the guidance of Regulatory Guide 1.160. Therefore, in accordance with the guidance of Generic Letter 94-01 and consistent with TSTF-37, this ISTS section has been deleted.

JUSTIFICATION FOR DEVIATIONS FROM NUREG-1434, REVISION 1
REVISED TS 6.6 – REPORTING REQUIREMENTS

11. The PAM Report specification of ISTS 5.6.8 has not been adopted as part of this submittal. The requirements for submitting a Special Report to the NRC in the event that accident monitoring instrumentation is inoperable currently reside in TS 3/4.6.11. This submittal is not converting either the Limiting Conditions for Operation or the Surveillance Requirements portions of the TS to the ITS format and content; therefore, the accident monitoring instrumentation requirements, including related special reports, are retained in CTS 3/4.6.11 rather than relocating them to the Administrative Controls portion of the TS.
12. This bracketed requirement (ISTS 5.6.9) has been deleted because it is not applicable to NMP1 (NMP1 does not have a prestressed concrete containment).
13. The Special Reports specification (CTS 6.9.3) has been added to be consistent with the current licensing basis. The proposed deletion of the inservice inspection related special reports (CTS 6.9.3.b through d), and the proposed deletion of the primary and secondary containment leakage testing special reports (CTS 6.9.3.e and f) are described and evaluated in a separate license amendment request (letter no. NMP1L 1628 dated November 26, 2001). The proposed relocation of the radiological effluent technical specification (RETS) related special reports (CTS 6.9.3.h through m, including Table 6.9.3-1) to the ODCM is described and evaluated in another separate license amendment request (letter no. NMP1L 1617 dated October 19, 2001).
14. Plant-specific wording preference that is consistent with the NMP1 CTS.

<CTS>



6.0 ADMINISTRATIVE CONTROLS

6.7 High Radiation Area



5.7.1

Pursuant to 10 CFR 20, paragraph 20.1601(c), in lieu of the requirements of 10 CFR 20.1601, each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is > 100 mrem/hr but < 1000 mrem/hr, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., [Health Physics Technicians]) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with exposure rates ≤ 1000 mrem/hr, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas.

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

- a. A radiation monitoring device that continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and personnel are aware of them.
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the [Radiation Protection Manager] in the RWP.

5.7.2

In addition to the requirements of Specification 5.7.1, areas with radiation levels ≥ 1000 mrem/hr shall be provided with locked or continuously guarded doors to prevent unauthorized entry and the keys shall be maintained under the administrative control of the Shift Foreman on duty or health physics supervision. Doors shall remain locked except during periods of access by personnel

<6.12.1>

Insert 6.7

2

<6.12.2>

(continued)

<CTS>

①
⑥
5.7 High Radiation Area

High Radiation Area
②
①
⑥
②

5.7.2 (continued)

under an approved RWP that shall specify the dose rate levels in the immediate work areas and the maximum allowable stay times for individuals in those areas. In lieu of the stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

5.7.3 For individual high radiation areas with radiation levels of > 1000 mrem/hr, accessible to personnel, that are located within large areas such as reactor containment, where no enclosure exists for purposes of locking, or that cannot be continuously guarded, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded and conspicuously posted, and a flashing light shall be activated as a warning device.

②
Insert 6.7

<6.12.1>
<6.12.2>

<CTS>

INSERT 6.7

2

<6.12.1> 6.7.1
<Doc LA.1>

In lieu of the "control device" or "alarm signal" required by Paragraph 20.203(c)(2) of 10CFR20, each high radiation area normally accessible* by personnel in which the intensity of radiation is greater than 100 mrem/hr** but less than 1000 mrem/hr** shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit in accordance with site approved procedures. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rates in the area have been established and personnel have been made knowledgeable of them.
- c. An individual qualified in radiation protection, with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the radiation protection manager or designate in the Radiation Work Permit.

<6.12.2> 6.7.2
<Doc LA.1>

In addition to the requirements of 6.7.1 areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose greater than 1000 mrem** shall be provided with locked doors to prevent unauthorized entry, and the hard keys or access provided by magnetic keycard shall be maintained under the administrative control of the Station Shift Supervisor or designate on duty and/or the radiation protection manager or designate. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify in accordance with site approved procedures accordingly, the dose rate levels in the immediate work area and the maximum allowable stay time for individuals in that area. In lieu of the stay time specification of the RWP, continuous surveillance, direct or remote, such as use of closed circuit TV cameras, may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities within the area. For individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose in excess of 1000 mrem** that are located within large areas, such as the drywell, where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

* by accessible passage and permanently fixed ladders
** measurement made at 18" from source of radioactivity

JUSTIFICATION FOR DEVIATIONS FROM NUREG-1434, REVISION 1
REVISED TS 6.7 – HIGH RADIATION AREA

1. The Administrative Controls portion of the NMP1 Revised Technical Specifications (TS) continues to be identified as Section 6.0, and all subsection numbers begin with “6” rather than “5,” to be compatible with the remainder of the NMP1 Current TS (CTS).
2. The brackets have been removed and the plant specific information from NMP1 CTS 6.12 has been provided. The High Radiation Area specification of ISTS 5.7 has not been adopted as part of this submittal. Proposed revisions to the High Radiation Area specification that are consistent with ISTS 5.7 are described and evaluated in a separate license amendment request (letter no. NMP1L 1617 dated October 19, 2001 and supplement).

ATTACHMENT C
NINE MILE POINT NUCLEAR STATION, LLC
LICENSE NO. DPR-63
DOCKET NO. 50-220

The following four tables summarize the proposed changes to NMP1 Current Technical Specification (CTS) 6.0, Administrative Controls. The change categories were previously defined in the October 26, 2001 submittal.

- Table A, Administrative Changes Matrix
- Table M, More Restrictive Changes Matrix
- Table L, Less Restrictive Changes Matrix
- Table R, Relocated Specifications and Removal of Details Matrix

TABLE A – ADMINISTRATIVE CHANGES MATRIX

DOC #	SUMMARY	REVISED TS SECTION	CTS SECTION
Table of Contents			
A.1	Editorial changes, reformatting, and revised numbering.	N/A	N/A
6.1, Responsibility			
A.1	Editorial changes, reformatting, and revised numbering.	6.1	6.1, 6.5
A.2	Moves the requirements of CTS 6.5.2.3 and 6.5.2.5 to Revised TS 6.1.1. Removes the phrase “and their safety evaluations” from the CTS requirements regarding Plant Manager reviews and approvals of proposed tests, experiments, and modifications to systems or equipment that affect nuclear safety, since approval of the safety evaluation is inherent in the approval of the modification, test, or experiment.	6.1.1	6.5.2.3, 6.5.2.5
A.3	Adds the acronym "SSS" for the Station Shift Supervisor-Nuclear position title.	6.1.2	6.1.2
A.4	Deletes the requirement for a management directive to be reissued annually to all personnel stating that the Station Shift Supervisor – Nuclear is responsible for the control room command function.	N/A	6.1.2
6.2, Organization			
A.1	Editorial changes, reformatting, and revised numbering.	6.2	6.2
A.2	Replaces the phrase “qualified in” with “qualified to implement” as it relates to radiation protection procedures.	6.2.2.c	6.2.2.d
A.3	Replaces the term “health physics” with “radiation protection,” and replaces the term “health physicists” with “key radiation protection personnel.”	6.2.1.d, 6.2.2.d	6.2.1.d, 6.2.2.h
A.4	Moves the requirements for unlicensed operating personnel from CTS Table 6.2-1 to Revised TS 6.2.2.a, clarifies the requirements for unlicensed operators when the process computer is out of service for greater than 8 hours, and replaces the term “unlicensed” with “non-licensed.”	6.2.2.a	Table 6.2-1 including Notes (2) and (3)
A.5	Moves the requirement that allows the shift crew composition to be less than the minimum requirements from CTS Table 6.2-1 to Revised TS 6.2.2.b, and replaces references to Table 6.2-1 with references to Revised TS 6.2.2.a and 10 CFR 50.54(m)(2)(i).	6.2.2.b	Table 6.2-1 including Note (6)

TABLE A – ADMINISTRATIVE CHANGES MATRIX

DOC #	SUMMARY	REVISED TS SECTION	CTS SECTION
A.6	Deletes note that specifically disallows any shift crew position to be unmanned upon shift change because an oncoming shift crewman scheduled to come on duty is late or absent, since the requirement of this note is covered by the wording of Revised TS 6.2.2.b.	6.2.2.b	Table 6.2-1 including Note (6)
A.7	Deletes statement that more operators can be assigned if needed, since the requirements of the minimum shift crew composition are specified and thus it is not necessary to specify whether the requirements may be exceeded.	N/A	Table 6.2-1 including Note (1)
A.8	Incorporates the qualification requirements of the Shift Technical Advisor from CTS 6.3.1, and modifies those requirements to reference the Commission Policy Statement on Engineering Expertise on Shift.	6.2.2.f	6.3.1
A.9	Replaces the person to whom the STA provides advisory technical support with a more generic statement; i.e., the term "Shift Supervisor" has been replaced with "shift supervision."	6.2.2.f	N/A
6.3, Unit Staff Qualifications			
A.1	Editorial changes and reformatting.	6.3	6.3
A.2	Moves the qualification requirements for the Shift Technical Advisor to Revised TS 6.2.	6.2.2.f	6.3.1
6.4, Procedures			
A.1	Editorial changes, reformatting, and revised numbering.	6.4	6.8
A.2	Moves the requirement relating to Regulatory Guide 1.33 to a separate sub-item within Revised TS 6.4.1, and identifies the specific revision of the regulatory guide.	6.4.1.a	6.8.1
6.5, Programs and Manuals			
A.1	Editorial changes, reformatting, and revised numbering.	6.5	4.3.3.a, 6.9.1.e, 6.11, 6.14, 6.16
A.2	Incorporates wording changes consistent with the changes to 10 CFR 50.59 published in the Federal Register (Volume 64, Number 191) dated October 4, 1999.	6.5.3	N/A

TABLE A – ADMINISTRATIVE CHANGES MATRIX

DOC #	SUMMARY	REVISED TS SECTION	CTS SECTION
A.3	Provides a more descriptive paragraph for the Primary Coolant Sources Outside Containment program (previously CTS 6.14, Systems Integrity) that outlines program elements and identifies applicable systems.	6.5.2	6.14
A.4	Adds a statement of applicability of TS 4.0.1 to CTS 6.14 (Revised TS 6.5.2).	6.5.2	6.14
6.6, Reporting Requirements			
A.1	Editorial changes, reformatting, and revised numbering.	6.6	1.31, 3.6.15.a, 3.6.15.b, Table 4.6.15-2, 3.6.15.d, 3.6.16.b, 3.6.20, 3.6.22, Table 4.6.20-1, 6.9.1, 6.9.2, 6.9.3
A.2	Delete the references to three topical reports, since all of the methods reviewed and approved by the NRC for Loss of Coolant Accident analysis and Stability analysis are now contained in a single report, NEDE-24011-P-A.	6.6.5.b	6.9.1.f
A.3	Deletes duplicate statements and unnecessary details regarding submittal of reports in accordance with 10 CFR 50.4.	6.6	6.9, 6.9.1.c, 6.9.1.f, 6.9.3
6.7, High Radiation Area			
A.1	Editorial changes, reformatting, and revised numbering.	6.7	6.12
Current Specification 6.4, Training			
None	None	None	None
Current Specification 6.5, Review and Audit			
A.1	Moves the requirements of CTS 6.5.2.3 and 6.5.2.5 to Revised TS 6.1.1.	6.1.1	6.5.2.3, 6.5.2.5

TABLE A – ADMINISTRATIVE CHANGES MATRIX

DOC #	SUMMARY	REVISED TS SECTION	CTS SECTION
Current Specification 6.6, Reportable Event Action			
A.1	Removes Reportable Event notification requirements from the Technical Specifications, since these requirements are contained in 10 CFR 50.72 and 10 CFR 50.73.	N/A	6.6.1.a
Current Specification 6.7, Safety Limit Violation			
A.1	Removes the Safety Limit Violation requirements as they relate to NRC notification, since the requirements are contained in and based upon the requirements located in 10 CFR 50.36(c)(1), 10 CFR 50.72, and 10 CFR 50.73.	N/A	6.7.1.a, 6.7.1.b, 6.7.1.c, 6.7.1.d
Current Specification 6.10, Record Retention			
None	None	None	None
Current Specification 6.13, Fire Protection Inspection			
None	None	None	None
Current Specification 6.15, Iodine Monitoring			
None	None	None	None

TABLE M – MORE RESTRICTIVE CHANGES MATRIX

DOC #	SUMMARY	REVISED TS SECTION	CTS SECTION
6.1, Responsibility			
M.1	More clearly specifies the qualifications of the individual designated to assume the control room command function in the absence of the Station Shift Supervisor-Nuclear.	6.1.2	N/A
6.2, Organization			
M.1	Add description of the duties of the Shift Technical Advisor.	6.2.2.f	N/A
6.3, Unit Staff Qualifications			
M.1	Clarifies the qualification requirements for licensed Senior Reactor Operators and licensed Reactor Operators to ensure that there is no misunderstanding when complying with 10 CFR 55.4 requirements.	6.3.2	N/A
6.4, Procedures			
M.1	Adds requirement that there be written procedures for activities involving the emergency operating procedures, quality assurance for radioactive effluent and radiological environmental monitoring, and the programs listed in Revised TS 6.5.	6.4.1.b, 6.4.1.c, 6.4.1.e	N/A
6.5, Programs and Manuals			
M.1	Adds a new program, the Technical Specifications Bases Control Program.	6.5.3	N/A
6.6, Reporting Requirements			
None	None	None	None
6.7, High Radiation Area			
None	None	None	None
Current Specification 6.4, Training			
None	None	None	None

TABLE M – MORE RESTRICTIVE CHANGES MATRIX

DOC #	SUMMARY	REVISED TS SECTION	CTS SECTION
Current Specification 6.5, Review and Audit			
None	None	None	None
Current Specification 6.6, Reportable Event Action			
None	None	None	None
Current Specification 6.7, Safety Limit Violation			
None	None	None	None
Current Specification 6.10, Record Retention			
None	None	None	None
Current Specification 6.13, Fire Protection Inspection			
None	None	None	None
Current Specification 6.15, Iodine Monitoring			
None	None	None	None

TABLE L – LESS RESTRICTIVE CHANGES MATRIX

DOC #	SUMMARY	REVISED TS SECTION	CTS SECTION	CHANGE TYPE
6.1, Responsibility				
L.1	CTS provides the title of the individual designated by the Plant Manager to approve modifications to structures, systems, and components, and approve proposed tests and experiments. The Revised TS will not specify this individual, but will require the person to be designated by the plant manager.	6.1.1	6.5.2.3, 6.5.2.5	1
6.2, Organization				
L.1	CTS provides a description of the individuals who can be designated by the Plant Manager to approve modifications to overtime requirements. The Revised TS will not provide this description, but will require the person to be designated by the plant manager.	6.2.2.d	6.2.2.h	1
6.3, Unit Staff Qualifications				
None	None	None	None	None
6.4, Procedures				
None	None	None	None	None
6.5, Programs and Manuals				
None	None	None	None	None
6.6, Reporting Requirements				
L.1	Removes the requirement to include documentation of challenges to the safety relief valves or safety valves in the monthly operating report.	N/A	6.9.1.c	2
6.7, High Radiation Area				
None	None	None	None	None

TABLE L – LESS RESTRICTIVE CHANGES MATRIX

DOC #	SUMMARY	REVISED TS SECTION	CTS SECTION	CHANGE TYPE
Current Specification 6.4, Training				
None	None	None	None	None
Current Specification 6.5, Review and Audit				
None	None	None	None	None
Current Specification 6.6, Reportable Event Action				
None	None	None	None	None
Current Specification 6.7, Safety Limit Violation				
None	None	None	None	None
Current Specification 6.10, Record Retention				
None	None	None	None	None
Current Specification 6.13, Fire Protection Inspection				
None	None	None	None	None
Current Specification 6.15, Iodine Monitoring				
None	None	None	None	None

CHANGE TYPE

1. Relaxation of the administrative requirement.
2. Elimination of CTS reporting requirement.

TABLE R – RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX

REVISED TS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
6.1, Responsibility					
6.1 – LA.1	6.1.1, 6.5.2.3, 6.5.2.5	Replaces the specific title “Plant Manager” with the generic title “plant manager” and relocates the specific title.	UFSAR	10 CFR 50 Appendix B programs	2
6.2, Organization					
6.2 – LA.1	6.2.1.a, 6.2.1.b, 6.2.1.c, 6.2.2.h	Replaces the specific title “Plant Manager” with the generic title “plant manager,” replaces the specific title “Chief Nuclear Officer” with the generic title “a specified corporate officer,” and relocates the specific titles.	UFSAR	10 CFR 50 Appendix B programs	2
6.2 – LA.2	6.2.2.a, 6.2.2.b, 6.2.2.e, Table 6.2-1	Details of the minimum shift crew requirements.	UFSAR	10 CFR 50 Appendix B programs	2
6.2 – LA.3	6.2.2.c, Table 6.2-1 including Note (4)	Requirements for at least two licensed Operators in the control room during reactor startup, scheduled reactor shutdown, and during recovery from reactor trips; two licensed Operators in hot shutdown; and only one Senior Operator and one Operator for cold shutdown and refueling conditions.	UFSAR	10 CFR 50 Appendix B programs	2
6.2 – LA.4	6.2.2.e, Table 6.2-1 Note (7)	Staffing requirements during power operations or hot shutdown and when the emergency plan is activated.	Site Emergency Plan	10 CFR 50.54(q)	2

TABLE R – RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX

REVISED TS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
6.2 – LA.5	6.2.2.f	Details that require all Core Alterations to be supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling; and the details that require all fuel moves be directly monitored by a member of the reactor analyst group.	UFSAR	10 CFR 50 Appendix B programs	2
6.2 – LA.6	6.2.2.h	Details of working hour limits for personnel who perform safety-related functions.	Administrative Procedures	10 CFR 50 Appendix B programs	2
6.2 – LA.7	6.2.2.i	Details of the operator license requirements for the specific positions of Station Shift Supervisor Nuclear and Assistant Station Shift Supervisor Nuclear, and the CTS requirement that only licensed individuals may direct licensed activities.	UFSAR	10 CFR 50 Appendix B programs	2
6.3, Unit Staff Qualifications					
6.3 – LA.1	6.3.1	Replaces the specific title “Manager Radiation Protection” with the generic title “radiation protection manager” and relocates the specific title.	UFSAR	10 CFR 50 Appendix B programs	2
6.4, Procedures					
6.4 – LA.1	6.8.1, 6.8.2, 6.8.3	The details of procedure reviews and approvals including temporary changes.	Quality Assurance Topical Report (UFSAR Appendix B)	10 CFR 50.54(a)	1
6.5, Programs and Manuals					
None	None	None	None	None	None

TABLE R – RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX

REVISED TS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
6.6, Reporting Requirements					
6.6 – LA.1	6.9.1.a	The details associated with the Startup Report specification.	UFSAR	10 CFR 50.59	1
6.6 – LA.2	6.9.1.e	The details regarding changes to the Process Control Program.	UFSAR	10 CFR 50.59	1
6.6 – LA.3	6.9.2	The details contained in CTS 6.9.2, “Fire Protection Program Reports.”	UFSAR	Operating License Paragraph 2.D(7)	1
6.7, High Radiation Area					
6.7 – LA.1	6.12.1, 6.12.2	Replaces the specific title “Manager Radiation Protection” with the generic title “ radiation protection manager” and relocates the specific title.	UFSAR	10 CFR 50 Appendix B programs	2
Current Specification 6.4, Training					
None – LA.1	6.4.1	The details on training and replacement training for the facility staff.	UFSAR	10 CFR 50 Appendix B programs	2
None – LA.2	6.4.2	The details of the Fire Brigade training program.	UFSAR	10 CFR 50 Appendix B programs	2
Current Specification 6.5, Review and Audit					
None – LA.1	6.5	The details of the Review and Audit specification.	Quality Assurance Topical Report (UFSAR Appendix B)	10 CFR 50.54(a)	2

TABLE R – RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX

REVISED TS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
Current Specification 6.6, Reportable Event Action					
None – LA.1	6.6.1.b	The requirements of CTS 6.6.1.b; Reportable Events reviews by SORC and submittal of the results of the reviews to the SRAB and the Vice President – Nuclear Generation.	Quality Assurance Topical Report (UFSAR Appendix B)	10 CFR 50.54(a)	2
Current Specification 6.7, Safety Limit Violation					
None – LA.1	6.7.1.b, 6.7.1.c, 6.7.1.d	The requirement for notification of the Vice President – Nuclear Generation and the SRAB in the event of a Safety Limit violation, the requirement for SORC to review the Safety Limit Violation Report, and the requirement to submit the Safety Limit Violation Report to the SRAB and the Vice President – Nuclear Generation.	Quality Assurance Topical Report (UFSAR Appendix B)	10 CFR 50.54(a)	2
Current Specification 6.10, Record Retention					
None – LA.1	6.10	The details contained in the Record Retention specification.	Quality Assurance Topical Report (UFSAR Appendix B)	10 CFR 50.54(a)	2
Current Specification 6.13, Fire Protection Inspection					
None – LA.1	6.13	The details contained in the Fire Protection Inspection specification.	Quality Assurance Topical Report (UFSAR Appendix B)	10 CFR 50.54(a)	2

TABLE R – RELOCATED SPECIFICATIONS AND REMOVAL OF DETAILS MATRIX

REVISED TS SECTION AND DOC #	CTS SECTION	SUMMARY	LOCATION	CHANGE CONTROL PROCESS	CHANGE TYPE
Current Specification 6.15, Iodine Monitoring					
None – LA.1	6.15	The details contained in the Iodine Monitoring specification.	UFSAR	10 CFR 50.59	2

CHANGE TYPE

1. Procedural details for meeting TS requirements and related reporting requirements.
2. Relocated administrative controls requirement.