

Marc P. Pearson
Director, Services & Projects

724-682-7775

October 17, 2002
L-02-100

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555-0001

**Subject: Beaver Valley Power Station, Unit No. 1 and No. 2
BV-1 Docket No. 50-334, License No. DPR-66
BV-2 Docket No. 50-412, License No. NPF-73
Response to a Request for Additional Information In
Support of License Amendment Request Nos. 298 and 170**

This letter provides the FirstEnergy Nuclear Operating Company (FENOC) response to a NRC Request for Additional Information (RAI) pertaining to FENOC letter L-02-009, dated January 16, 2002. The subject letter submitted License Amendment Request Nos. 298 (Unit 1) and 170 (Unit 2) requesting an amendment to the above licenses in the form of changes to the technical specifications (TSs). The License Amendment Requests proposed administrative, editorial, and format changes to the TS index and the Administrative Controls section of the TS. Specifically, a relocation of the TS Bases page listings from the TS index to a TS Bases index, and removal of certain administrative requirements from Section 6, "Administrative Controls," of the TSs.

Attachment A contains the RAI transmitted by NRC letter dated August 16, 2002 (TAC Nos. MB3844 and MB3845) and the FENOC responses. The responses contain revised discussion of changes (DOC) that should replace those transmitted by FENOC letter L-02-009. Attachment B contains revised current technical specification (CTS) markups that reflect the revised DOC justification and replace those transmitted by FENOC letter L-02-009. Attachment B also includes revised markups of TS Bases pages XVII and XVIII for Beaver Valley Power Station Unit 1. The markup for page XVIII transmitted by FENOC letter L-02-009 should have shown the entry for Table 6.2-1 as deleted. The revised markup for page XVIII results in the deletion of this entire page. For this reason, page XVII is modified to show that the next page is XIX. The markup for page XVII should, therefore, be added to the markups transmitted by FENOC letter L-02-009, and the revised markup for page XVIII should replace the page transmitted by FENOC letter L-02-009. The revised marked-up pages and responses do not change the evaluations or conclusions presented in FENOC letter L-02-009.

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There are no new commitments made in this letter. An implementation period of up to 60 days is requested following the effective date of this amendment.

If there are any questions concerning this matter, please contact Mr. Larry R. Freeland, Manager, Regulatory Affairs/Performance Improvement at 724-682-5284.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 17, 2002.

Sincerely,



Marc P. Pearson

Attachments:

- A. FENOC Responses to RAI dated August 16, 2002
- B. Revised CTS Markups for Units 1 and 2

- c: Mr. D. S. Collins, NRR Project Manager
Mr. D. M. Kern, NRC Sr. Resident Inspector
Mr. H. J. Miller, NRC Region I Administrator
Mr. D. A. Allard, Director BRP/DEP
Mr. L. E. Ryan (BRP/DEP)

NRC Request for Additional Information

The NRC staff has identified questions or concerns regarding the following discussion of changes (DOC), provided in Attachment B to the application, that require clarification or additional information in order for the NRC staff to complete its review:

RAI Item 1

For DOC A.1, regarding the current Technical Specification (TS) Bases Index, the application requests that the TS Bases Index listings be removed from the BVPS-1 and 2 TSs and maintained in the BVPS Bases Control Program. This change is justified in the submittal as being, "acceptable because the NRC has approved the removal of the TS Bases from TSs to be controlled by the BVPS Bases Control Program." This statement is not entirely correct. Title 10 of the Code of Federal Regulations (10CFR), Section 50.36 did not require that the TS Bases be part of the TSs; only that the Bases be submitted with the TSs. In addition, it is unclear from the DOC and other supporting information as to where the Bases are located (i.e. are they a separate document attached to the TSs, or are they part of the BVPS Bases Control Program?). If the Bases are a separate document attached to the TSs, the index should be attached to the Bases, and not the Bases Control Program. If the Bases are part of the Bases Control Program, the change and justification are acceptable. Describe the location of the BVPS-1 and 2 TS Bases and provide a DOC justification that explicitly accounts for the location of the BVPS-1 and 2 TS Bases in the justification.

FENOC Responses to Item 1

A revised DOC A.1 is provided below to clarify the location of the TS Bases Index and replaces DOC A.1 submitted in FENOC letter L-02-009.

The TS Bases Index is not contained in the BVPS Bases Control Program. The BVPS Bases Control Program controls changes to the BVPS TS Bases. The program requires that TS Bases changes are assessed and controlled by the 10 CFR 50.59 Safety Evaluation process. The program was approved by the NRC on July 20, 2001, as part of Amendments 239 (Unit 1) and 120 (Unit 2). After the requested amendment is approved, the TS Bases Index will become part of the Bases, and therefore, controlled by the BVPS Bases Control Program.

Revised DOC A.1

The TS Bases Index will be maintained in the same document as the TS Bases. Presently the TS and Bases are contained within the same document with an Index appearing at the front that includes both the TSs and the Bases. Following the approval of this License Amendment Request, an index listing only the TSs will be located in

front of the TSs and an index listing only TS Bases will be located in front of the TS Bases.

These changes are acceptable because the NRC has approved control of changes to the TS Bases by the BVPS Bases Control Program as required by TS 6.18. It follows that the corresponding TS Bases Index listings can be relocated from the existing TS index to a separate TS Bases Index that is retained with the TS Bases.

Therefore, changes to the TS Bases Index will also be controlled under the provisions of the BVPS Bases Control Program. As such, any changes to this material will be properly evaluated and NRC review and approval obtained when required.

These changes are designated administrative because they do not result in technical changes to the current TSs.

RAI Item 2

For DOCs A.6, A.12, A.14, A.15 and A.16, the application provided justifications for the removal of current technical specifications (CTS) 6.4, 6.6.1.b, 6.7.1.b, 6.7.1.c, and 6.7.1.d from the BVPS-1 and 2 TSs. These requested changes would relocate the details of non-regulatory requirements from the TSs to the Updated Final Safety Analysis Report (UFSAR). Even though these details are currently contained in the UFSAR, the overall change with respect to the TSs is a less restrictive relocation of details (LA) change. Revise the CTS markup and provide additional discussion and justification for these less restrictive changes.

FENOC Responses to Item 2

FENOC has clarified and revised the subject DOCs to be more consistent with a typical ISTS conversion submittal. As a result some of the subject DOCs have been re-categorized as a less restrictive relocation (LA) of detail change, while others have been re-categorized as a less restrictive (L) change. Therefore, the following DOCs have been re-categorized and renumbered: A.6 is replaced by LA.1, A.12 is replaced by LA.2, A.14 is replaced by L.3, A.15 is replaced by LA.3, and A.16 is replaced by L.4. The re-categorization and renumbering results in the elimination of DOC numbers A.6, A.12, A.14, A.15 and A.16. The revised DOCs provide justification for the removal of current technical specifications (CTS) 6.4, 6.6.1.b, 6.7.1.b, 6.7.1.c, and 6.7.1.d from the BVPS-1 and 2 TSs. The re-categorization is shown on the revised CTS markups provided in Attachment B of this letter. The following revised DOCs replace A.6, A.12, A.14, A.15 and A.16 submitted in FENOC letter L-02-009.

Revised DOC LA.1 replaces A.6

TS 6.4, "Training," subsection TS 6.4.1 states, "The retraining and replacement training program for the facility staff shall be maintained and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55." This requirement statement is to be removed from TSs.

The purpose of TS 6.4, and its subsection TS 6.4.1, is to specify training consistent with Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55. This proposed change is acceptable because 10 CFR Part 55 already addresses these training requirements. Additionally, this requirement is not specified in the Improved Standard Technical Specifications (ISTS).

This change is designated as a less restrictive relocation of detail change because information relating to specifying training is being removed from the TS.

Revised DOC LA.2 replaces A.12

TS 6.6, "Reportable Event Action," subsection 6.6.1 states, "The following actions shall be taken for REPORTABLE EVENTS: b. Each REPORTABLE EVENT shall be reviewed by the OSC, and the results of this review shall be submitted to the ORC." This requirement is to be removed from TSs but retained in the UFSAR.

This change is acceptable because this type of information is not necessary to be included in Technical Specifications to provide adequate protection of public health and safety. The description of the means by which the Plant Operations Review Committee (PORC), which is the Onsite Safety Committee (OSC) for BVPS, and the Company Nuclear Review Board (CNRB), which is the Offsite Review Committee for BVPS, support the Technical Specifications and perform other tasks is contained in the UFSAR and is not specified in the ISTS.

The proposed change is a less restrictive relocation of the requirement to the UFSAR. Changes to the UFSAR are controlled under the provisions of 10 CFR 50.59. As such, any changes to this material will be properly evaluated and NRC review and approval obtained when required.

This change is designated as a less restrictive relocation of detail change because information relating to OSC and CNRB support of Reportable Events is being removed from the TSs.

Revised DOC L.3 replaces A.14

Unit 1 TS 6.7, "Safety Limit Violation," subsection 6.7.1, subpart b. states, "The Safety Limit violation shall be reported to the Commission within one hour and to the plant manager and to the ORC within 24 hours." Unit 2 TS 6.7, "Safety Limit Violation," subsection 6.7.1, subpart b. states, "The Safety Limit violation shall be reported to the Commission within one hour. The Safety Limit violation shall be reported to the plant manager and to the ORC within 24 hours." DOC A.7 provides justification for the removal of the requirement to report the safety limit violation to the NRC within one hour since the 10 CFR 50.72 reporting requirements are sufficient. This DOC addresses the reporting requirements within the FENOC organization (plant manager and ORC) that are to be removed from TSs.

This change is acceptable because this type of information is not necessary to be included in Technical Specifications to provide adequate protection of public health and safety. The requirements for reporting a safety limit violation within the plant's organization are a level of detail beyond what is required to be specified in the Technical Specifications or the UFSAR to ensure the plant is operated in a safe manner. This detail is administrative in nature and, therefore, does not affect the safe operation of the plant. Thus, these requirements can be removed from the Technical Specifications with no adverse effect on the safe operation of the plant.

This change is designated as a less restrictive change because information relating to reporting requirements for safety limit violations within the FENOC organization is being removed from the TSs.

Revised DOC LA.3 replaces A.15

TS 6.7, "Safety Limit Violation," subsection 6.7.1, subpart c. states, "A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the On-Site Safety Committee (OSC). This report shall describe (1) the applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence." This requirement is to be removed from TSs but retained in the UFSAR.

This change is acceptable because this type of information is not necessary to be included in Technical Specifications to provide adequate protection of public health and safety. The description of the means by which the OSC support the Technical Specifications and perform other tasks is contained in the UFSAR and is not specified in the ISTS. Per the UFSAR, the OSC is required to review all reportable events of the type described in 10 CFR 50.73, which would include safety limit violations. 10 CFR 50.73(b) provides the content requirements for Licensee Event Reports which bound the requirements of CTS 6.7.1.c.

The proposed change is a less restrictive relocation of the requirement to the UFSAR. Changes to the UFSAR are controlled under the provisions of 10 CFR 50.59. As such, any changes to this material will be properly evaluated and NRC review and approval obtained when required.

This change is designated as a less restrictive relocation of detail change because information relating to OSC support of the Technical Specifications is being removed from the TSs.

Revised DOC L.4 replaces A.16

TS 6.7, "Safety Limit Violation," subsection 6.7.1, subpart d. states, "The Safety Limit Violation Report shall be submitted to the Commission, the ORC and the plant manager within 30 days of the violation." The safety limit violation reporting requirement is to be removed from TSs. DOC A.8 provides justification for the removal of the requirement to submit the report of the safety limit violation to the NRC within 30 days since the 10 CFR 50.73 reporting requirements are sufficient. This DOC addresses the reporting requirements within the FENOC organization (plant manager and ORC) that are to be removed from TSs.

This change is acceptable because this type of information is not necessary to be included in Technical Specifications to provide adequate protection of public health and safety. The submission of a safety limit violation report within the plant's organization is a level of detail beyond what is required to be specified in the Technical Specifications or the UFSAR to ensure the plant is operated in a safe manner. This detail is administrative in nature and, therefore, does not affect the safe operation of the plant. Thus, these requirements can be removed from the Technical Specifications with no adverse effect on the safe operation of the plant.

This change is designated as a less restrictive change because information relating to reporting requirements for safety limit violations within the FENOC organization is being removed from the TSs.

RAI Item 3

For DOC A.10, FENOC proposed to relocate CTS 6.2.2.a, 6.2.2.b, 6.2.2.c, and Table 6.2-1 with proposed TS (PTS) 6.2.2.a, 6.2.2.b, and 6.2.2.f. The change associated with converting CTS Table 6.2-1, Note # to PTS 6.2.2.b is labeled and justified as an administrative change. This is incorrect. BVPS-1 CTS Table 6.2-1 Note #, and BVPS-2 CTS Table 6.2-1 Note #, state that, "Shift crew composition may be one less than the minimum requirements ..." PTS 6.2.2.b states that the, "shift crew composition may be less than the minimum requirement ..." PTS 6.2.2.b is less restrictive than the requirements of CTS Table 6.2-1 Note # in that the shift crew would be able to be more than one less than the minimum requirement as long as the requirements of

10 CFR 50.54 are not violated. Revise the CTS markup and provide a discussion and justification for the less restrictive (L) change.

FENOC Responses to Item 3

FENOC has clarified and revised the subject DOC to be more consistent with a typical ISTS conversion submittal. As a result DOC A.10 has been re-categorized as a less restrictive change and renumbered to L.5. The re-categorization and renumbering results in the elimination of DOC number A.10. The re-categorization is shown on the revised CTS markup provided in Attachment B of this letter. The following revised DOC replaces A.10 submitted in FENOC letter L-02-009.

Revised DOC L.5 replaces A.10

TS 6.2.2.b. is proposed to be replaced in the TSs with the text of ISTS 5.2.2.b, which will be modified slightly to state, "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.f 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." The slight modification to ISTS 5.2.2.b changes the numeric subsections to align with the appropriate subsections of the BVPS TSs.

The purpose of this proposed change is to permit the removal of Table 6.2-1 from the TSs. This is accomplished by deleting, modifying and moving existing requirements such that the proposed BVPS TSs are consistent with the ISTS. Following these changes, Table 6.2-1 can be removed from the TS. The result is that 10 CFR 50.54(m)(2)(i) and TS 6.2.2 will then control shift-manning requirements in a manner consistent with the ISTS.

One of the requirements for shift manning presently appears as Note # of Table 6.2-1. This requirement is modified and then moved to TS 6.2.2.b. The first part of the modification is to remove "one less" from the requirement addressing the minimum control room staffing level. This change is consistent with the ISTS.

Table 6.2-1 requires 2 senior reactor operators (SROs), 2 reactor operators (ROs), 1 shift technical advisor (STA) and 2 non-licensed auxiliary operators for each of the BVPS control rooms whenever the plant is in Modes 1 through 4. The minimum staffing requirements of 10 CFR 50.54(m)(2)(i) requires 2 SROs and 2 ROs to man the facility during Mode 1 through 4 for each unit. Note for staffing requirements, each BVPS unit is considered a single unit site with a single control room because the operators are licensed for a specific unit. The proposed change is considered a less restrictive change since the temporary reduction in minimum staffing of SROs and ROs would not be limited to only one less than the required minimum. However, for the BVPS units, the reduction in the number of SROs and ROs would be limited to one because the

requirements of 50.54(m)(2)(iii) apply, which requires an SRO and either a RO or SRO to be present in the control room whenever the plant is in Modes 1 through 4. Adopting the proposed requirement thus results in a change that does not alter the SRO and RO minimum staffing requirement specified in the current TS 6.2.2.b. The requirement to maintain at least one SRO and either one RO or SRO present at the controls provides adequate assurance that the plant will continue to be operated in a safe manner.

Proposed sections 6.2.2.a and 6.2.2.f retain the requirements regarding the number of non-licensed auxiliary operators and STAs during Modes 1 through 4. Adopting proposed sections 6.2.2.a and 6.2.2.b is a less restrictive change regarding the number of non-licensed auxiliary operators because a reduction in the number is not limited. The proposed change is a temporary deviation (limited to 2 hours). The proposed change is acceptable because the restrictive time limit provides sufficient assurance that staffing levels will be promptly restored without adversely affecting the safe operation of the plant. Adopting proposed sections 6.2.2.a and 6.2.2.f has no effect on the STA position, since the maximum possible temporary reduction for this position is one.

Therefore, following adoption of the proposed change, 10 CFR 50.54(m)(2)(i) and sections 6.2.2.a and 6.2.2.f will specify the minimum shift composition in Modes 1 through 4.

For Modes 5 and 6, Table 6.2-1 requires 1 SRO, 1 RO, 1 non-licensed auxiliary operator and no STA. With the proposed change, staffing during these modes will be controlled by 10 CFR 50.54(k), which requires that either an SRO or RO be present at the controls at all times during operation of the plant, and proposed section 6.2.2.a. This is a less restrictive change, because adopting the proposed change eliminates the minimum staffing level specified in the CTS for SROs, ROs and non-licensed auxiliary operators during Modes 5 and 6. This is consistent with the ISTS and an acceptable change because the requirements of 10 CFR 50.54(k) ensure that at least one SRO or RO is present in the control room while the plant is in a shutdown or refueling mode. While in these modes the plant is in an inherently more stable condition since the reactor is in cold shutdown. Therefore, the staffing requirements of 10 CFR 50.54(k) provide adequate assurance the plant will continue to be operated in a safe manner.

The second part of the modification consists of deleting the current exception to the requirement of 10 CFR 50.54 regarding an oncoming shift crewman being late or absent. The exception does not appear in the ISTS or the proposed TS 6.2.2.b requirement. This exception is unnecessary since the revised requirement does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewmember being late or absent. The exception was present to provide a clarification that the 2 hours permitted for an "unexpected absence" of an on-duty crewmember can not be used for a late or absent oncoming crewmember. The provision for an "unexpected absence" is specifically to cover those situations where an on-duty crewmember falls ill, has a work

related accident that prevents completion of their duties, or some other emergency that prevents continuance of required duties. A crewmember late, or absent for their shift, is not considered an on-duty shift crewmember. Thus, the revised requirement does not allow any shift crew position to be unmanned upon shift change due to an oncoming shift crewmember being late or absent. The CTS clarification is not necessary since the requirements of 10 CFR 50.54(m)(2)(i) and PTSs 6.2.2.a and 6.2.2.f provide sufficient guidance as to when the 2 hour grace period can be exercised. Therefore, deleting the clarification does not change the effectiveness of the proposed requirement.

The final modification is to replace the reference to Table 6.2-1, with references to 10 CFR 50.54(m)(2)(i) and PTSs 6.2.2.a and 6.2.2.f. The modified note is then moved to TS 6.2.2.b.

These proposed changes are acceptable because they are consistent with the ISTS requirements, 10 CFR 50.54(k), 10 CFR 50.54(m)(2)(i), and the current licensing basis for the BVPS units. These changes are designated as a less restrictive change because staffing levels are reduced for some positions, during some modes of operation, and Table 6.2-1 is being removed from the TSs.

Letter L-02-100 Attachment B

Revised CTS Markups for Unit 1 and 2

Table Index (cont.)

<u>TABLE</u>	<u>TITLE</u>	<u>PAGE</u>
3.3-11	Accident Monitoring Instrumentation	3/4 3-51
4.3-7	Accident Monitoring Instrumentation Surveillance Requirements	3/4 3-52
4.4-1	Minimum Number of Steam Generators to be Inspected During Inservice Inspection	3/4 4-10g
4.4-2	Steam Generator Tube Inspection	3/4 4-10h
4.4-3	Reactor Coolant System Pressure Isolation Valves	3/4 4-14b
4.4-12	Primary Coolant Specific Activity Sample and Analysis Program	3/4 4-20
3.7-1	OPERABLE Main Steam Safety Valves versus Maximum Allowable Power	3/4 7-2
3.7-2	Steam Line Safety Valves Per Loop	3/4 7-4
4.7-2	Secondary Coolant System Specific Activity Sample and Analysis Program	3/4 7-9
3.8-1	Battery Surveillance Requirements	3/4 8-9a
3.9-1	Beaver Valley Fuel Assembly Minimum Burnup vs. Initial U235 Enrichment For Storage in Region 2 Spent Fuel Racks	3/4 9-15

~~Table Index (cont.)~~

<u>TABLE</u>	<u>TITLE</u>	<u>PAGE</u>
A.1 B-3/4.4-1	Reactor Vessel Toughness Data (unirradiated)	B-3/4-4-7
L.5 6.2-1	Minimum Shift Crew Composition	6-4

ADMINISTRATIVE CONTROLS

~~SAFETY LIMIT VIOLATION (Continued)~~

A.8 L4	d. The Safety Limit Violation Report shall be submitted to the Commission, the ORC and the plant manager within 30 days of the violation.
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6.8 PROCEDURES

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

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Not used.
- e. Not used.
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.

6.8.2 Deleted

6.8.3 Deleted

6.8.4 Deleted

ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility and radiation protection staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for the operations manager as specified in Specification 6.2.2.gg, the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and the technical advisory engineering representative who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design and response analysis of the plant for transients and accidents.

LA.1 6.4 TRAINING DELETED

~~6.4.1 A retraining and replacement training program for the facility staff shall be maintained and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.~~

6.5 DELETED

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified in accordance with 10 CFR 50.72 and/or a report be submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and

LA.2 ~~b. Each REPORTABLE EVENT shall be reviewed by the OSC, and the results of this review shall be submitted to the ORC.~~

6.7 SAFETY LIMIT VIOLATION DELETED

~~6.7.1 The following actions shall be taken in the event a Safety Limit is violated:~~

A.13 ~~a. The facility shall be placed in at least HOT STANDBY within one (1) hour.~~

A.7
L.3 ~~b. The Safety Limit violation shall be reported to the Commission within one hour and to the plant manager and to the ORC within 24 hours.~~

LA.3 ~~c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the On-Site Safety Committee (OSC). This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.~~

ADMINISTRATIVE CONTROLS

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LA1

6.4 TRAINING DELETED

~~6.4.1 A retraining and replacement training program for the facility staff shall be maintained and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.~~

6.5 DELETED

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified in accordance with 10 CFR 50.72 and/or a report be submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and

LA2

- ~~b. Each REPORTABLE EVENT shall be reviewed by the OSC, and the results of this review shall be submitted to the ORC.~~

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~~6.7.1 The following actions shall be taken in the event a Safety Limit is violated:~~

A.13

- ~~a. The facility shall be placed in at least HOT STANDBY within one (1) hour.~~

A.7
L.3

- ~~b. The Safety Limit violation shall be reported to the Commission within one hour. The Safety Limit violation shall be reported to the plant manager and to the ORC within 24 hours.~~

LA.3

- ~~c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the On Site Safety Committee (OSC). This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.~~

ADMINISTRATIVE CONTROLS

~~SAFETY LIMIT VIOLATION (Continued)~~

A8 L4	d. The Safety Limit Violation Report shall be submitted to the Commission, the ORC and the plant manager within 30 days of the violation.
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6.8 PROCEDURES

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

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Not used.
- e. Not used.
- f. Fire Protection Program implementation.
- g. PROCESS CONTROL PROGRAM implementation.
- h. OFFSITE DOSE CALCULATION MANUAL implementation.

6.8.2 Deleted

6.8.3 Deleted

6.8.4 Deleted

Please note that these inserts are applicable to both units.

A.9

INSERT 1 (for TS 6.2.2.a.):

A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4.

L.5

INSERT 2 (for TS 6.2.2.b.):

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.f 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.