Entergy

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William J. Riggs
Director, Nuclear Assessment

October 15, 2002

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

SUBJECT: Entergy Nuclear Operations, Inc.
Pilgrim Nuclear Power Station
Docket No. 50-293
License No. DPR-35

Correction of Technical Specification Typographical Errors

REFERENCES:

1. Issuance of Amendment No. 187 to Facility Operating License No. DPR-35, Pilgrim Nuclear Power Station, Standby Gas Treatment and Control Room High Efficiency Air Filtration Systems (TAC No. MA7769), dated February 13, 2001

2. Issuance of Amendment No. 153 to Facility Operating License No. DPR-35, Pilgrim Nuclear Power Station (TAC No. M88843), dated May 16, 1994.

3. Proposed Guidance for Correction of Technical Specification Typographical Errors, SECY-96-238, dated November 19, 1996.

4. Entergy Letter No. 2.02.062, "Correction of Technical Specification Typographical Errors", dated June 27, 2002.

LETTER NUMBER: 2.02.091

Dear Sir or Madam:

This letter replaces Entergy Letter No. 2.02.062 (Reference 4) and requests NRC approval of corrections of three inadvertent typographical errors in Pilgrim Technical Specifications. There are no technical changes made with this revision to the original request.

Three typographical errors were inadvertently introduced during License Amendments 187 and 153 (References 1 and 2). These errors were neither addressed in the notice to the public nor reviewed by the NRC and thus, fall within the scope of the guidance provided in SECY-96-238 (Reference 3) for corrections.

Attachment 1 describes the typographical errors and corrections. Attachment 2 provides mark-up of Technical Specification pages.

Entergy will issue change notifications to all holders of Controlled copies of Pilgrim Technical Specifications upon receipt of NRC approval of these corrections.

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If you have any questions regarding the information contained in this letter, please contact Mr. Bryan Ford (508) 830-8403.

Sincerely,

W.J. Riggs

Attachments:
1. Description of Technical Specification Typographical Errors – (2 pages)
2. Marked-up Technical Specification Pages Correcting the Typographical Errors – (2 pages)

cc:

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Senior Resident Inspector
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ATTACHMENT 1

DESCRIPTION OF TECHNCIAL SPECIFICATION

TYPOGRAPHICAL ERRORS

A. REQUESTED ACTION

Consistent with the information contained in SECY-96-238, Pilgrim is requesting corrections to three inadvertent typographical errors that were introduced in the Pilgrim Technical Specification.

B. TYPOGRAPHICAL ERRORS

Three typographical errors were inadvertently introduced in the Pilgrim Technical Specification pages during License Amendments 187 and 153 (References 1 and 2). The specifics of these errors and proposed corrections are described below.

1. TS page 5.0-14

   Amendment 177 (Reference 3) approved TS 5.7.1 with "...exposure rates ≤1000 mrem/hr..." in the first paragraph, 9th line and TS 5.7.2 with "radiation levels ≥1000 mrem/hr", first paragraph, 2nd line.

   Subsequently, Amendment 187 (Reference 1) was issued with new TS pages 5.0-10 through 15 to reflect new page numbers. During the word processing of these pages two numerical sign errors were inadvertently introduced on TS page 5.0-14. The sign "≤" was inadvertently printed as "=" in TS 5.7.1 first paragraph, 9th line, reading "exposure rates =1000 mrem/hr" instead of "exposure rates ≤1000 mrem/hr". A second error was introduced in TS 5.7.2 first paragraph, 2nd line, reading "radiation levels = 1000 mrem/hr" instead of "radiation levels ≥1000 mrem/hr".

   These erroneous changes were not addressed in the Amendment 187 notice to the public nor they were reviewed and approved by the NRC.

2. TS page 3/4.6- 11

   Amendment 151 (Reference 4) approved TS 4.6.I.2.A with "At least once per operating cycle, a representative sample (12.5% of the total of each type: hydraulic, mechanical) of snubbers ... shall be functionally tested. For each snubber that does not meet the functional test acceptance criteria of Specification 4.6.I.2.B or 4.6.I.2.C, an additional 12.5% of that type of snubber shall be functionally tested." This Specification is on TS page 3/4.6-11. Prior to Amendment 151 (Reference 4), "an additional 10% of that type of snubber" was required to be tested, instead of 12.5%.

However, before the receipt of NRC approved Amendment 151, Pilgrim submitted a proposed change for TS 4.6.1.2.C on the same page based upon the current TS page. During the NRC review, page 3/4.6-11 was not reconciled to the previously approved Amendment 151 (Reference 4) TS 4.6.1.2.A, thus Amendment 153 inadvertently reinstated the 10% testing requirement.

This error was not noticed to the public nor approved by the NRC during review and approval of Amendment 153 (Reference 2).

The above errors were discovered during use of applicable Specifications. These typographical errors did not cause any safety issues.

Attachment 2 provides the marked-up TS pages with corrections to the typographical errors.

C. CORRECTIONS TO THE AFFECTED TECHNICAL SPECIFCATION PAGES

SECY-96-238 (Reference 5) provides guidance to correct inadvertent typographical errors in the Technical Specification pages.

The above typographical errors were neither noticed to the public nor reviewed by the NRC as part of the applicable amendment process. Therefore, they may be corrected without a license amendment.

D. REFERENCES

1. Issuance of Amendment No. 187 to Facility Operating License No. DPR-35, Pilgrim Nuclear Power Station, Standby Gas Treatment and Control Room High Efficiency Air Filtration Systems (TAC No. MA7769), dated February 13, 2001

2. Issuance of Amendment No. 153 to Facility Operating License No. DPR-35, Pilgrim Nuclear Power Station (TAC No. M88843), dated May 16, 1994.

3. Issuance of Amendment No. 177 to Facility Operating License No. DPR-35, Pilgrim Nuclear Power Station (TAC No. MA0378), dated July 31, 1998.

4. Issuance of Amendment No. 151 to Facility Operating License No. DPR-35, Pilgrim Nuclear Power Station (TAC Nos. M83787, M87191, M88390), dated April 6, 1994.

5. Proposed Guidance for Correction of Technical Specification Typographical Errors, SECY-96-238, dated November 19, 1996.

ATTACHMENT 2

MARKED-UP TECHNCIAL SPECIFICATION PAGES

CORRECTING THE TYPOGRAPHICAL ERRORS

TS Page 5.0-14

TS Page 3/4.6-11

5.0 ADMINISTRATIVE CONTROLS

5.7 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 personnel) 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 Nuclear Watch Engineer on duty or health physics supervision. Doors shall remain locked except during periods of access by personnel 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

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LIMITING CONDITIONS FOR OPERATION

3.6 PRIMARY SYSTEM BOUNDARY (Cont)

SURVEILLANCE REQUIREMENT

4.6 PRIMARY SYSTEM BOUNDARY (Cont)

I. Shock Suppressors (Snubbers) (Cont)

hydraulic, mechanical) of snubbers in use in the plant shall be functionally tested, either in place or in a bench test. For each snubber that does not meet the functional test acceptance criteria of Specification 4.6.I.2.B, or 4.6.I.2.C, as applicable, an additional 12.5% of that type of snubber shall be functionally tested.

B. General Snubber Functional Test Acceptance Criteria (Hydraulic and Mechanical)

The general snubber functional test shall verify that:

1. Activation (restraining action) is achieved within the specified range of velocity or acceleration in both tension and compression.

2. Snubber release, or bleedrate, as applicable, where required, is within the specified range in compression or tension. For snubbers specifically required not to displace under continuous load, the ability of the snubber to withstand load without displacement shall be verified.

C. Mechanical Snubbers Functional Test Acceptance Criteria

The mechanical snubber functional test shall verify that: