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1.0 DESCRIPTION

This letter is a request to amend Operating License NPF-6 for Arkansas Nuclear One, Unit 2 (ANO-2).

The proposed changes will revise Section 6.0, Administrative Controls, of the ANO-2 Technical Specifications (TSs). The revision to Section 6.0 requires changes to several other TSs. The changes are proposed so that the philosophy and location (i.e., logical order) of the specifications in Section 6.0 reflect the recently approved conversion of the Arkansas Nuclear One, Unit 1 (ANO-1) to Improved Technical Specifications (ITS) and the subsequent amendments to the ANO-1 ITS. A discussion of differences between the ANO-1 ITS and the proposed change and NUREG-1432, *"Standard Technical Specifications Combustion Engineering"* and the proposed change is also included in this section.

A format change to all the pages is also included, changing the fort and margins. This change is considered editorial and will not be discussed.

The proposed changes for each CTS requirement are separated into the following categories:

Designator Category

L

- A ADMINISTRATIVE- Changes to the Current Technical Specifications (CTS) that result in no additional or reduced restrictions or flexibility. These changes are supported in aggregate by a single No Significant Hazards Considerations (NSHC).
- M TECHNICAL CHANGES MORE RESTRICTIVE changes to the CTS that result in added restrictions or reduced flexibility. These changes are supported in aggregate by a single NSHC.

TECHNICAL CHANGES – LESS RESTRICTIVE – changes to the CTS that result in reduced restrictions or added flexibility. Each corresponding evaluation is supported by a corresponding evaluation supporting a finding of NSHC.

TECHNICAL CHANGES – REMOVAL OF DETAILS – changes to the CTS that eliminate detail and relocate the detail to a licensee controlled document. Typically, this involves details of system design and function, or procedural detail on methods of conducting a surveillance. These changes are supported in aggregate by a single NSHC.

1.1 Facility Operating License (FOL) 2.C.(3)(p), Secondary Water Chemistry Monitoring

Discussion of Change:

This FOL condition will be deleted and an equivalent programmatic requirement will be added as proposed TS (PTS) 6.5.10. The requirements of the condition will be retained with only minor non-technical administrative changes. See section 1.60 for the discussion of the changes to the wording of PTS 6.5.10.

Administrative Changes

- A1 The designated change represents a non-technical non-intent change to the ANO-2 CTS made to make the ANO-2 proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the "Standard Technical Specifications Compustion Engineering Plants" (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.
- A3 The Secondary Water Chemistry Monitoring and the Primary Coolant Sources Outside Containment license conditions will be moved to equivalent programmatic requirements in PTS Section 6.5, Programs and Manuals. The requirements of these license conditions will be retained in Section 6.5. The PTS programmatic administrative controls specifications are consistent with NUREG-1432 and current plant practice, and meet the intent of the existing license conditions. As such, this change in presentation of existing requirements is purely administrative.



1.1 Facility Operating License (FOL) 2.C.(3)(p), Secondary Water Chemistry Monitoring (continued)

Discussion of Differences

ANO-1 Comparison

The proposed change is consistent with ANO-1 Specification 5.5.10.

NUREG-1432 Comparison

The relocation of this FOL condition to PTS 6.5.10 is consistent with the location of the program in NUREG-1432. See section 1.60 for the discussion of differences between the new PTS 6.5.10 and the NUREG-1432 specification 5.5.10.

1.2 FOL 2.C.(5), Program to Reduce Leakage Outside Containment

Discussion of Changes

This license condition will be deleted and an equivalent programmatic requirement will be added as PTS 6.5.2.

PTS 6.5.2 results in a change of the frequency from "at a frequency not to exceed refueling cycle intervals" to "at least once per 18 months." Since normal "refueling cycle intervals" are 18 months, presenting this requirement in this manner is consistent with the current requirements.

PTS 6.5.2 is considered a surveillance requirement (SR) and thus the normal surveillance intervals that are specified in the Limiting Condition for Operation (LCO) section that allow a 25% extension of the frequency in accordance with SR 4.0.2 are applicable to PTS 6.5.2. Because SR 4.0.2 applies to the LCO section of procedures, it is necessary to reference its applicability to PTS 6.5.2. This change is described in Technical Specification Task Force (TSTF)-299.

Administrative Changes

- A1 The designated change represents a non-technical non-intent change to the ANO-2 CTS made to make the ANO-2 proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the "Standard Technical Specifications Combustion Engineering Plants" (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.
- A3 The Secondary Water Chemistry Monitoring and the Primary Coolant Sources Outside Containment license conditions will be moved to equivalent programmatic requirements in PTS Section 6.5 Programs and Manuals. The requirements of these license conditions will be retained in Section 6.5. The PTS programmatic administrative controls specifications are consistent with NUREG-1432 and current plant practice, and meet the intent of the existing license conditions. As such, this change in presentation of existing requirements is purely administrative.

Technical Changes – More Restrictive None Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

1.2 FOL 2.C.(5), Program to Reduce Leakage Outside Containment (continued)

Discussion of Differences

ANO-1 Comparison

The proposed change is consistent with the ANO-1 TS.

NUREG-1432 Comparison

The relocation of the license condition to specification 6.5.2 is consistent with the location of the requirement in NUREG-1432. See section 1.61 for a discussion of the differences of the proposed TS 6.5.2.



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1.3 FOL 2.C.(6), Program to Determine Airborne Iodine Concentration in Vital Areas under Accident Conditions

Discussion of Changes

This FOL condition will be deleted. No equivalent programmatic requirement will be added.

Administrative Changes

A5 FOL 2.C.(6) requires an established program to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. NUREG-1432, Specification 5.5.3 includes a reviewer's note that states: "This program may be eliminated based on the implementation of Topical Report CE NPSD-1157, Rev. 1, "Technical Justification for the Elimination of the Post-Accident Sampling System from the Plant Design and Licensing Basis for CEOG Utilities." and the associated NRC Safety Evaluation dated May 16, 2000." Approval of Amendment 218 dated August 17, 2000 resulted in the elimination of the post accident sampling system requirements. Therefore, this FOL will be deleted and no new TS created. This is considered an administrative cleanup related to the approval of Amendment 218.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

None.

Technical Changes – Removal of Details

Discussion of Differences

ANO-1 Comparison

This license condition is still contained in the ANO-1 ITS as specification 5.5.3. NUREG-1430, Revision 2, "Babcock and Wilcox Plants," does not include an allowance to delete this requirement as does NUREG-1432.

NUREG-1432 Companison

The proposed change is consistent with the reviewer's note contained in NUREG-1432, specification 5.5.3 that states: "This program may be eliminated based on the implementation of Topical Report CE NPSD-1157, Rev. 1, "Technical Justification for the Elimination of the Post-Accident Sampling System from the Plant Design and Licensing Basis for CEOG Utilities," and the associated NRC Safety Evaluation dated May 16, 2000."

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1.4 Index Pages

Discussion of Changes

The Index pages will be changed to reflect the correct titles and page numbers based on the changes proposed.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the ANO-2 CTS made to make the ANO-2 proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the "Standard Technical Specifications Combustion Engineering Plants" (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

None

Discussion of Differences

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1.5 Definitions

Discussion of Changes

The reference to Technical Specification 6.9.5 will be changed to Technical Specification 6.6.5.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the ANO-2 CTS made to make the ANO-2 proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the "Standard Technical Specifications Combustion Engineering Plants" (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 and NUREG-1432 Comparison

As this is a reference change only, no attempt is made to change the definition to be consistent with the ANO-1 ITS or NUREG 1432 definition. The currently approved wording will be maintained with only the change to the referenced TS.

1.6 Table 3-3.6, Radiation Monitoring Instrumentation

Discussion of Changes

A new action 21 will be annotated in the Action column for item 2.b, Control Room Ventilation Intake Duct Monitors. In addition the page format will be changed from landscape to portrait. No revision bars will be used to reflect the change from landscape to portrait.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the ANO-2 CTS made to make the ANO-2 proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the "Standard Technical Specifications Combustion Engineering Plants" (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include, wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

This change simply adds the reference to the new action in the action column. The discussion of differences between the actions will follow.

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1.7 Table 3.3-6, Action 17

Discussion of Changes

CTS Action 17 applies to the Control Room Ventilation Intake Duct Monitors. Per note 2 on Table 3-3.6, these monitors are required to be operable and the associated actions are applicable in Modes 1, 2, 3, 4, and during handling of irradiated fuel. The proposed change will modify action 17 to be applicable during Mode 1, 2, 3, or 4 and will add a new action 21 which is applicable during the handling of irradiated fuel. The shutdown requirements will be modified as described below.

Administrative Changes



A1 The designated change represents a non-technical non-intent change to the ANO-2 CTS made to make the ANO-2 proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the "Standard Technical Specifications Combustion Engineering Plants" (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.

Technical Changes – More Restrictive

- M4 A statement was added to Action 17 to provide the appropriate default condition to be in HOT SHUTDOWN within the next 6 hours and COLD SHUTDOWN in the following 30 hours. Currently if the Action is not met Limiting Condition for Operation (LCO) 3.0.3 is entered. This is considered a more restrictive change since CTS Table 3.3-6 Action 17 does not provide these actions and less time is allowed by entry into LCO 3.0.3.
- M5 Per Note 2 on Table 3.3-6, the control room ventilation intake duct monitors are required to be operable in Modes 1, 2, 3, 4, and during handling of irradiated fuel. CTS Actions 17 and 20 provide guidance for each of these applicable modes. The proposed change will create a separate Action 21 to provide an appropriate condition if the LCO is not met during movement of irradiated fuel assemblies. The proposed change is considered more restrictive since less time is proposed in Action 21 than was allowed by Actions 17 and 20.

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

1.7 Table 3.3-6, Action 17 (continued)

Discussion of Differences

ANO-1 Comparison

ANO-1 ITS 3.3.16 describes the Control Room Isolation – High Radiation function. Actions B and C of the ANO-1 specification address the inoperability of two channels in Modes 1, 2, 3 or 4. The proposed change is consistent with the allowable outage times contained in the ANO-1 ITS. However, due to the format of ITS vice the format of the ANO-2 CTS, wording differences exist. The intent of the proposed change is the same as the ANO-4 TS.

NUREG-1432 Comparison

The following exceptions to NUREG-1432 are noted:

- NUREG-1432 LCO 3.3.9 requires the operability of only one control room isolation signal channel. The proposed change and the existing ANO-2 TSs require two control room ventilation intake duct monitors to be operable. The two units share the ANO control room ventilation system and isolation is provided by one channel primarily, but not completely, associated with each unit. The channel associated with each unit initiates the control room emergency ventilation system for that unit, but provides isolation for both units' control rooms since they are a shared facility. Since there are two channels, appropriate ACTIONS are included. Conditions A & B of NUREG-1432 3.3.9 address the required actions when in Modes 1, 2, 3 or 4. The proposed actions are similar to NUREG-1432 with the same completion times
- NUREG-1432.3.3.9 includes a note related to the toxic gas protection mode. The ANO control room emergency recirculation mode is the same as a toxic gas protection mode. Therefore, the note in NUREG LCO 3.3.9 Required Action A. 1 is not required.

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1.8 Table 3.3-6, Action 18

Discussion of Changes

CTS Action 18, which is applicable to the Containment High Range Monitor, requires in part that a Special Report be submitted to the NRC pursuant to TS 6.9.2 when less than the minimum number of channels is operable.

Administrative Changes

A6 Specification 6.9.2, which requires the submittal of a special report to the Commission if various systems cannot be restored, will be deleted and thus the reference to it in various specifications will be deleted. Written communication to the NRC is described in 10 CFR 50.4 and therefore, the proposed change will only reference that the report should be submitted to the NRC. Guidance in 10 CFR 50.4 adequately ensures that the regional office will receive a copy of the report.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 ITS Comparison

ANO-1 ITS requires a special report when the reactor building high range radiation monitors are inoperable. The proposed change is consistent with the ANO-1 ITS.

NUREG-1432 Comparison

Specification 3.3.15 in NUREG-1432 includes a requirement for the containment building high range radiation monitors to be operable. If inoperability occurs, the NUREG requires that a special report be submitted within 14 days in accordance with NUREG-1432 specification 5.6.7. The proposed change to the ANO-2 TS retains the currently approved allowance for submittel of the special report within 30 days.

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1.9 Table 3.3-6, Action 19

Discussion of Changes

CTS Action 19, which is applicable to the Main Steam Line Radiation Monitors, requires in part that a Special Report be submitted to the NRC pursuant to TS 6.9.2 when less than the minimum number of channels is operable.

Administrative Changes

A6 Specification 6.9.2, which requires the submittal of a special report to the Commission if various systems cannot be restored, will be deleted and thus the reference to it in various specifications will be deleted. Written communication to the NRC is described in 10 CFR 50.4 and therefore, the proposed change will only reference that the report should be submitted to the NRC. Guidance in 10 CFR 50.4 adequately ensures that the regional office will receive a copy of the report.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 ITS Comparison

The main steam line radiation monitors were deleted from the ANO-1 TSs in the conversion to the ITS. The ANO-2 main steam line monitors are in the current licensing bases and will be retained at this time.

NUREG-1432 Comparison

NUREG-1432 does not include a specification for the main steam line radiation monitors. These monitors will be retained in the ANO-2 TSs at this time.

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1.10 Table 3.3-6, Action 20

Discussion of Changes

CTS Action 20 applies to the Control Room Ventilation Intake Duct Monitors. Per note 2 on Table 3-3.6, these monitors are required to be operable and the associated actions are applicable in Modes 1, 2, 3, 4, and during handling of irradiated fuel. The proposed change will modify action 20 to be applicable during Mode 1, 2, 3, or 4 and will add a new action 21 which is applicable during the handling of irradiated fuel. The shutdown requirements will be modified as described below.

Administrative Changes

None

Technical Changes – More Restrictive



- M3 CTS Table 3.3-6, Action 20 provides actions for inoperability of one channel of control room isolation on high radiation. After 7 days of inoperability of one channel the action allows an additional 6 hours to initiate and maintain operation of the Control Room Ventilation System (CREVS). This additional 6 hours is not included in the proposed change. This time period is excessive for initiation of CREVS; further, most problems can be restored within the initial 7 days. If the isolation instrumentation is not restored, the actuation of CREVS can easily be implemented within the initial 7 days.
- M4 A statement was added to Action 20 to provide the appropriate default condition to be in HOT SHUTDOWN within the next 6 hours and COLD SHUTDOWN in the following 30 hours. Currently if Action 20 is not met, Limiting Condition for Operation (LCO) 3.0.3 is entered. This is considered a more restrictive change since CTS Table 3.3-6 Action 20 does not provide these actions and less time is allowed by entry into LCO 3.0.3.
- M5 Per Note 2 on Table 3.3-6, the control room ventilation intake duct monitors are required to be operable in Modes 1, 2, 3, 4, and during handling of irradiated fuel. CTS Actions 17 and 20 provide guidance for each of these applicable modes. The proposed change will create a separate Action 21 to provide an appropriate condition if the LCO is not met during movement of irradiated fuel assemblies. The proposed change is considered more restrictive since less time is proposed in Action 21 than was allowed by Actions 17 and 20.

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

1.10 Table 3.3-6, Action 20 (continued)

Discussion of Differences

ANO-1 Comparison

ANO-1 ITS 3.3.16 describes the Control Room Isolation – High Radiation function. Actions B and C of the ANO-1 specification address the inoperability of two channels in Modes 1, 2, 3 or 4. The proposed change is consistent with the allowable outage times contained in the ANO-1 ITS. However, due to the format of ITS vice the format of the ANO-2 CTS, wording differences exist. The intent of the proposed change is the same as the ANO-1 ITS.

NUREG-1432 Comparison

The following exceptions to NUREG-1432 are noted:



- NUREG-1432 LCO 3.3.9 requires the operability of only one control room isolation signal channel. The proposed change and the existing ANO-2 TSs require two control room ventilation intake duct monitors to be operable. The two units share the ANO control room ventilation system and isolation is provided by one channel primarily, but not completely, associated with each unit. The channel associated with each unit initiates the control room emergency ventilation system for that unit, but provides isolation for both units' control rooms since they are a shared facility. Since there are two channels, appropriate ACTIONS are included. Conditions A & B of NUREG-1432 3.3.9 address the required actions when in Modes 1, 2, 3, or 4. The proposed actions are similar to NUREG-1432 with the same completion times.
- NUREG-1432 3.3.9 includes a note related to the toxic gas protection mode. The ANO control room emergency recirculation mode is the same as a toxic gas protection mode. Therefore, the note in NUREG LCO 3.3.9 Required Action A. 1 is not required.

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1.11 Table 3.3-6, Action 21

Discussion of Changes

A new Action 21 will be added which will be applicable during handling of irradiated fuel.

Administrative Changes

None Technical Changes – More Restrictive

M5 Per Note 2 on Table 3.3-6, the control room ventilation intake duct monitors are required to be operable in Modes 1, 2, 3, 4, and during handling of irradiated fuel. CTS Actions 17 and 20 provide guidance for each of these applicable modes. The proposed change will create a separate Action 21 to provide an appropriate condition if the LCO is not met during movement of irradiated fuel assemblies. The proposed change is considered more restrictive since less time is proposed in Action 21 than was allowed by Actions 17 and 20.

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 Comparison

ANO-1 ITS 3.3.16, Action D addresses the necessary actions related to one or two channels being inoperable during movement of irradiated fuel. The proposed change is consistent with this action. Although the wording of the proposed change for ANO-2 is not exactly the same as the wording contained in the ANO 1 ITS, the intent is the same.

NUREG-1432 Comparison

NUREG-1432 LCO 3.3.9 addresses the control room isolation signal and requires only one operable channel. Condition C addresses the required actions during movement of recently irradiated fuel assemblies. The proposed change is similar in that it requires immediate actions upon discovery of one or two inoperable channels.

1.12 Table 4.3-3, Note 6

Discussion of Changes

A new Note 6 will be added to item 2.b. The addition of the reference to Note 6 in the Channel Functional Test column and the change of the page format from landscape to portrait are administrative. The addition of Note 6 is less restrictive

A format change is also proposed to this page. The page layout will be changed from landscape to portrait. No revision bars will be used to reflect the change from landscape to portrait.

Administrative Changes



A1 The designated change represents a non-technical non intent change to the ANO-2 CTS made to make the ANO-2 proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the "Standard Technical Specifications Combustion Engineering Plants" (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

L2 Note 6 will be added to CTS Table 4.3-3. The note provides a three (3) hour time period with the monitor inoperable to conduct the CHANNEL FUNCTIONAL TEST without entering the associated Actions. This allowance is based on an industry average time frame for conducting the test and the need to conduct the test during conditions for which the monitor is normally required to be OPERABLE. When performing the channel functional test on the radiation monitors, the monitors' intended function of isolating the control room and starting the appropriate emergency ventilation system is demonstrated. Is there some justification topical report or something?

Technical Changes - Removal of Details

None

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1.12 Table 4.3-3, Note 6 (continued)

Discussion of Differences

ANO-1 Comparison

The adoption of the note related to the channel functional test into the ANO-2 TS is consistent with the note contained in the ANO-1 ITS SR 3.3.16.2. However, the noun name of the control room ventilation intake duct monitor was used in the ANO-2 TS which is consistent with the current noun name in the ANO-2 CTS.

The ANO-1 CTS contained a note stating "Check functioning of self-checking feature on each detector." The ANO-2 CTS does not have such a note and therefore no similar change is required. In addition, the note is not found in NUREG-1432.

NUREG-1432 Comparison

A similar note is not included in NUREG-1432 SR 3.3.9.2.

1.13 Table 3.3-10, Post-Accident Monitoring Instrumentation

Discussion of Changes

A format change only is proposed to page 3/4 3-40. The page layout will be changed from landscape to portrait to be consistent with the change format change proposed on page 3/4 3-40a. No revision bars will be used to reflect the change from landscape to portrait.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the ANO-2 CTS made to make the ANO-2 proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the "Standard Technical Specifications Combustion Engineering Plants" (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None



None

1.14 Table 3.3-10, Actions 3b and 4b

Discussion of Changes

The phrase "pursuant to specification 6.9.2" will be deleted from Actions 3b and 4b.

A format change is proposed to page 3/4 3-40a. The page layout will be changed from landscape to portrait. No revision bars will be used to reflect the change from landscape to portrait.

Administrative Changes

- A1 The designated change represents a non-technical, non-intent change to the ANO-2 CTS made to make the ANO-2 proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the "Standard Technical Specifications Combustion Engineering Plants" (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formating changes; and hierarchy structure.
- A6 Specification 6.9.2, which requires the submittal of a special report to the Commission if various systems cannot be restored, will be deleted and thus the reference to it in various specifications will be deleted. Written communication to the NRC is described in 10 CFR 50.4 and therefore, the proposed change will only reference that the report should be submitted to the NRC. Guidance in 10 CFR 50.4 adequately ensures that the regional office will receive a copy of the report.



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1.14 Table 3.3-10, Actions 3b and 4b (continued)

Discussion of Differences

ANO-1 Comparison

The actions associated with Post Accident Monitoring Instrumentation contained in ANO-1 ITS 3.3.15 require a submittal of a special report when the instrumentation cannot be restored. Therefore, the proposed change is consistent with the requirement contained in the ANO-1 ITS.

NUREG-1432 Comparison

NUREG-1432 includes an optional reporting requirement 5.6.7 related to Post Accident Monitoring Reports. The NUREG-1432 specification will not be adopted. The ANO-2 current license basis allows reporting within 30 days, which differs from the 14-day reporting requirement in the NUREG. No change is proposed to the CTS 30-day allowance.

1.15 Steam Generator Surveillance Requirements 4.4.5.0, 4.4.5.1, 4.4.5.2, 4.4.5.3, 4.4.5.4, and Tables 4.4-1 and 4.4-2

Discussion of Changes

These surveillance requirements will be relocated to PTS 6.5.9 as the proposed Steam Generator Tube Surveillance Program.

The CTS note that states: "The requirements for inservice inspection do not apply during the steam generator replacement outage (2R14)." will be deleted.

See the markup of inserts and the associated discussion (Section 1.62) for the changes made to these surveillance requirements.

Administrative Changes

None

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

LA5 CTS SR 4.4.5.0 contains the following note: "The requirement for inservice inspection do not apply during the steam generator replacement outage (2R14)." This outage was completed in 2000 and the note is no longer applicable.

Discussion of Differences

ANO-1 Comparison

ANO-1 relocated the steam generator tube surveillance program to specification 5.5.9. Due to two units being different, the current licensing basis varies slightly. ANO-2 is relocating the current licensing basis with minor changes.

NUREG-1432 Companison

NUREG-1432 specification 5.5.9 contains a reviewer's note specifying that the current licensing basis for the SG tube surveillance program should be relocated to this specification. ANO-2 is relocating the current licensing basis with only minor changes. Therefore, this change is consistent with the NUREG reviewer's note.

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1.16 Steam Generator Surveillance Requirement 4.4.5.5

Discussion of Changes

The reporting requirements will be relocated to PTS 6.6.7. See section 1.46 for the changes made to the reporting requirements.

Administrative Changes

None

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 Comparison



ANO-1 ITS includes steam generator reporting requirements in specification 5.6.7. The ANO-2 proposed change is consistent with the location of the special reporting requirement contained in the ANO-1 ITS conversion. However, based on the reviewer's note contained in NUREG-1432 (see below) the exact format of the ANO-1 conversion is not adopted.

NUREG 1432 Comparison

Steam generator reporting requirements are contained in NUREG-1432 Specification 5.6.9. The specification contains a reviewer's note that states: "Reports required by the Licensee's current licensing basis regarding steam generator tube surveillance requirements shall be included here." The proposed change is consistent with the guidance contained in the reviewer's note.

1.17 TS 3.5.2, ECCS Subsystems - Tavg \geq 300°F, Action b

Discussion of Changes

The phrase "to the Commission pursuant to Specification 6.9.2" will be changed to "to the NRC."

Administrative Changes

A6 Specification 6.9.2, which requires the submittal of a special report to the Commission if various systems cannot be restored, will be deleted and thus the reference to it in various specifications will be deleted. Written communication to the NRC is described in 10 CFR 50.4 and therefore, the proposed change will only reference that the report should be submitted to the NRC. Guidance in 10 CFR 50.4 adequately ensures that the regional office will receive a copy of the report.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 Comparison

ANO-1 CTS did not require a special report in conjunction with ECCS actuations nor does the ANO-1 ITS conversion require a special report. Therefore, the ANO-1 TSs and ANO-2 current licensing basis differ. This is a requirement of the ANO-2 current licensing basis and will be retained

NUREG-1432 Comparison

NUREG-1432 does not require a special report associated with ECCS actuations. The report is contained in the ANO-2 current licensing basis and will be retained.

1.18 TS 3.5.3, ECCS Subsystems – Tavg \leq 300°F, Action b

Discussion of Changes

The phrase "to the Commission pursuant to Specification 6.9.2" will be changed to "to the NRC."

Administrative Changes

A6 Specification 6.9.2, which requires the submittal of a special report to the Commission if various systems cannot be restored, will be deleted and thus the reference to it in various specifications will be deleted. Written communication to the NRC is described in 10 CFR 50.4 and therefore, the proposed change will only reference that the report should be submitted to the NRC. Guidance in 10 CFR 50.4 adequately ensures that the regional office will receive a copy of the report.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 Comparisón

ANO-1 CTS did not require a special report in conjunction with ECCS actuations nor did the ANO-1 ITS conversion require a special report. Therefore, the ANO-1 TSs and ANO-2 current licensing basis differ. This is a requirement of the ANO-2 current licensing basis and will be retained

NUREG-1432 Comparison

NUREG-1432 does not require a special report associated with ECCS actuations. The report is contained in the ANO-2 current licensing basis and will be retained.

1.19 Surveillance Requirement 4.6.3.1.4

Discussion of Changes

Surveillance Requirement (SR) 4.6.3.1.4 will be relocated to PTS 6.5.16, the Containment Leakage Rate Testing Program. Due to the relocation SR 4.6.3.1.4 will be changed to state: "The containment purge supply and exhaust isolation valves shall be demonstrated OPERABLE as specified in the Containment Leakage Rate Testing Program."

See section 1.59 for the markup of changes and associated discussion related to the changes to CTS SR 4.6.3.1.4 in the proposed change to PTS 6.5.16.

Administrative Changes

A1 The designated change represents a non-technical non intent change to the ANO-2 CTS made to make the ANO-2 proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the "Standard Technical Specifications Combustion Engineering Plants" (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

None

Technical Changes - Removal of Details

Discussion of Differences

See discussion in Section 1.59 with PTS 6.5.16.

1.20 TS 3.7.6.1, Control Room Emergency Ventilation and Air Conditioning System, Actions d and e and Note 1

Discussion of Changes

The requirements of CTS 3.7.6.1 will be revised to specify that:

- The control room boundary can be opened intermittently under administrative controls (proposed Note 1).
- Both control room emergency ventilation system (CREVS) trains can be inoperable for 24 hours if due to a control room boundary inoperability (proposed Action d).
- Entry into Specification 3.0.3 will be required if both trains of CREVS are inoperable for reasons other than the control room boundary or if both trains of the control room emergency air conditioning system (CREACS) are inoperable (proposed Action e).
- The current Actions designated as Actions d, e, f, and g will be designated as f, g, h, and i, respectively.
- A new page 3/4 7-17a will be added to accommodate the addition of the new actions.

Administrative Changes

- A1 The designated change represents a non-technical, non-intent change to the ANO-2 CTS made to make the ANO-2 proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the "Standard Technical Specifications Combustion Engineering Plants" (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.
- A7 A new Action e will be added to TS 3.7.6.1 to direct entry into LCO 3.0.3 while in Modes 1, 2, 3, or 4 if both trains of CREVS are inoperable for reason other than an inoperable control room boundary or if both trains of the CREACS are inoperable. This is equivalent to the CTS requirements and is needed as an explicit condition due to the addition of Action d.

Technical Changes - More Restrictive



Technical Changes – Less Restrictive

L3 The requirements of CTS 3.7.6.1 will be revised to allow the control room boundary to be opened intermittently under administrative controls, and to allow both CREVS trains to be inoperable for 24 hours if the control room boundary is inoperable. This condition is not allowed by the CTS and would result in an entry into the requirements of LCO 3.0.3. Requiring entry into LCO 3.0.3 for this condition is excessive, as it does not provide sufficient time to attempt a repair. Entry into the Action is expected to be very infrequent and there is a low probability of a design basis accident during any given 24 hour period. Implementation of the administrative controls associated with opening the control room boundary intermittently will ensure that the control room boundary can be rapidly closed when a need for control room isolation is indicated.

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1.20 TS 3.7.6.1, Control Room Emergency Ventilation and Air Conditioning System, Actions d and e and Note 1 (continued)

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 Comparison

The proposed change captures the intent of ANO-1 ITS 3.7.8 and the associated actions and note 1. Format difference between ITS and CTS result in minor wording differences.

The CTS 3.7.6.1 requirements for the CREVS will not be revised to include ANO-1 ITS 3.7.9 note 2, which states that one train of the CREVS shall be capable of automatic actuation. The information contained in this note is consistent with the currently approved ANO-2 bases for the CREVS, which states the following: "The actions associated with the control room emergency ventilation and air conditioning systems ensure that the remaining train is OPERABLE, that no failures preventing automatic actuation will occur, and that any active failure will be readily detected." Therefore, the note is not necessary in the ANO-2 TS.

ANO-1 ITS 3.7.9 Action F (CREVS) and ITS 3 7.10 Action E (CREACS) require entry into TS 3.0.3. The proposed change to ANO-2 TS 3.7.6.1 Action e is consistent with the logic presented in these ANO-1 specifications

NUREG-1432 Comparison

The proposed change captures the intent of Revision 2 of NUREG-1432 specification 3.7.11 and the associated actions and note. Due to the format difference between ITS and CTS minor wording differences are required.

NUREG -1432 Specification 3.7 11 does not contain a note similar to the ANO-1 ITS note 2. Therefore, the proposed change to the ANO-2 TSs is consistent with the intent of NUREG-1432.

NUREG-1432 Specification 3.7.1 Action F and NUREG-1432 Specification 3.7.12 Action E require entry into TS 3.0.3. The proposed change to ANO-2 TS 3.7.6.1Action e captures the intent of these two NUREG-1432 specifications.

1.21 Surveillance Requirements 4.7.6.1.2.a, 4.7.6.1.2.d.2, and new 4.7.6.1.2.d

Discussion of Changes

SR 4.7.6.1.2.a requires that the control room emergency air filtration system be tested by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the system operates for at least 15 minutes. The proposed change will reword the SR to require that each control room emergency air filtration system operate for at least 15 minutes. The specific details of how to perform the test will be relocated to the TS Bases as follows:

"Performance of SR 4.7.6.1.2.a requires that the control from emergency air filtration system be started from the control room and flow through the HEPA filters and charcoal adsorbers."

SR 4.7.6.1.2.d.2 will be relocated to SR 4.7.6.1.2.b and the requirements modified such that the test can be performed using either an actual or a simulated signal. Various details of this SR will be relocated to the TS Bases as follows:

"Performance of SR 4.7.6.1.2.b requires automatic isolation of the control room within 10 seconds upon injection of an actual or simulated control room high radiation test signal. Flow shall be verified through the HEPA filters and charcoal adsorber banks."

A new SR 4.7.6.1.2.d will be added to require verification at least every 18 months of the system makeup flow rate when supplying the control room with outside air. This requirement applies only to the ANO-1 emergency ventilation fan (VSF-9). The AND-1 fan has a makeup charcoal filter, which have a minimum and maximum requirement for face velocity and other parameters that require the flow rate. The ANO-2 fan (2VSF-9) coes not have a separate makeup filter. A similar test is, therefore, not required for the ANO-2 fan. The fan applicability will be included in the TS Bases as follows:

"Performance of SR 4.7.6 1.2.d verifies the ability of CREVS to provide outside air at a flow rate of approximately 333 cfm \pm 10%. This SR is applicable to VSF-9 only because it has a separate makeup charcoal filter. 2VSF-9 does not have a separate makeup filter."

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the ANO-2 CTS made to make the ANO-2 proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the "Standard Technical Specifications Combustion Engineering Plants" (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.

1.21 Surveillance Requirements 4.7.6.1.2.a and 4.7.6.1.2.d.2 (continued)

Technical Changes – More Restrictive

M11 A new SR will be added as SR 4.7.6.1.2.d to require verification of the CREVS makeup flow rate when supplying the control room with outside air. This SR is applicable for the ANO-1 fan (VSF-9) only as will be reflected in the TS bases.

Technical Changes – Less Restrictive

L11 SR 4.7.6.1.2.d will be relocated to SR 4.7.6.1.2.b and an option to verify the system automatically isolates by using either an actual or a simulated test signal. This allows satisfactory automatic system initiations for other than surveillance purposed to be used to fulfill the surveillance requirements. OPERABILITY is adequately demonstrated in either case since the system cannot discriminate between "actual" or "simulated" signals.

Technical Changes – Removal of Details

LA2 This information will be moved to a license controlled document such as the Bases, Safety Analysis Report (SAR), QAPM, Technical Requirements Manual (TRM), etc. The information provides details of design or process which are not directly pertinent to the actual requirement, i.e., Definition, Limiting Condition for Operation, or Surveillance Requirement, but rather describe additional unnecessary details such as an acceptable method of compliance. Since these details are not necessary to adequately describe the actual regulatory requirement, they can be moved to a licensee controlled document without a significant impact on safety. Placing these details in controlled documents provides adequate assurance that they will be maintained. The Bases will be controlled by the Bases Control Process in Chapter 6 of the PTS.

Discussion of Differences

ANO-1 JTS Comparison

The proposed change is similar to the ANO-1 ITS considering the differences in format. ANO-1 ITS SR 3.7.9.1 is the same as the ANO-2 proposed change to SR 4.7.6.1.2.a and ANO-1 ITS SR 3.7.9.3 is the same as the ANO-2 PTS 4.7.6.1.2.b. ANO-1 SR 3.7.9.4 is the same as ANO-2 PTS 4.7.6.1.2.d

NUREG-1432 Companison

The proposed change is similar to the NUREG-1432 SRs 3.7.11.1, 3.7.11.3, and 3.7.11.4 considering the differences in format and system design.

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1.22 Surveillance Requirement 4.7.6.1.2.b, 4.7.6.1.2.c, 4.7.6.1.2.d.1, 4.7.6.1.2.e, and 4.7.6.1.2.f, Control Room Emergency Air Filtration System

Discussion of Changes

These SRs describe the ventilation filtration program associated with the control room emergency filtration system. They will be relocated along with the fuel handling area ventilation filtration testing program (CTS SR 4.9.11.2) to PTS 6.5.11, the Ventilation Filter Testing Program (VFTP). A new SR 4.7.6.1.2.c will direct the performance of the VFTP. See Section 1.64 and the Markup of Inserts for the discussion of changes to these surveillance requirements.

Administrative Changes



A8 PTS 4.7.6.1.2.c directs performance of Control Room Emergency Ventilation filter testing in accordance with the Ventilation Filter Testing Program (VFTP). This change is administrative. CTS 4.7.6.1.2.b c, d 1, e, and f, which directed performance of filter testing, will be relocated to PTS 6.5.11, the VFTP. The PTS 4.7.6.1.2.c ensures the requirements of the VFTP are performed.

Technical Changes – More Restrictive None Technical Changes – Less Restrictive None Technical Changes – Removal of Details None

1.22 Surveillance Requirement 4.7.6.1.2.b, 4.7.6.1.2.c, 4.7.6.1.2.d.1, 4.7.6.1.2.e, and 4.7.6.1.2.f, Control Room Emergency Air Filtration System (continued)

Discussion of Differences

ANO-1 Comparison

The ANO-2 proposed VFTP will be similar to the ANO-1 ITS. The program will include only the Control Room Emergency Ventilation System and the Fuel Handling Area Ventilation System. The Penetration Ventilation System is not included as a Technical Specification system in the ANO-2 current licensing basis. The relocation of these SRs will reflect the intent of the ANO-1 ITS VFTP.

NUREG-1432 Comparison

The relocation of the ventilation filter testing program from the control room emergency ventilation and air conditioning system is consistent with the philosophy set forth in the NUREG. The NUREG does not specifically define the systems or testing acceptance criteria, as these are plant specific. The relocation of these SRs will reflect the intent of the NUREG.

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1.23 Shock Suppressors (Snubbers) Surveillance Requirement 4.7.8.h

Discussion of Changes

The proposed change will delete the reference to Specification 6.10.2.

Administrative Changes

A9 Surveillance Requirement 4.7.8.h refers to Specification 6.10.2, which was deleted from the ANO-2 TSs with Amendment 209. The reference to Specification 6.10.2 was inappropriately left in SR 4.7.8.h. The proposed change will delete the reference to Specification 6.10.2.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

None

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1.24 Spent Fuel Pool Structural Integrity, TS 3.7.12, Action a.

Discussion of Changes

This action requires submittal of a special report to the commission pursuant to Specification 6.9.2, which will be deleted. The required special report will be retained, however. Minor wording changes are proposed to delete reference to specification 6.9.2 and state that the report should be submitted to the NRC.

Administrative Changes

A6 Specification 6.9.2, which requires the submittal of a special report to the Commission if various systems cannot be restored, will be deleted and thus the reference to it in various specifications will be deleted. Written communication to the NRC is described in 10 CFR 50.4 and therefore, the proposed change will only reference that the report should be submitted to the NRC. Guidance in 10 CFR 50.4 adequately ensures that the regional office will receive a copy of the report.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 and NUREG-1432 Companison

Neither ANO-1 ITS or NUREG-1432 have a similar specification. The current ANO-2 licensing basis requires this submittal and it will be retained.

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1.25 TS 3.8.1, Action b and Note 1

Discussion of Changes

Action b and Note 1 will be moved from page 3/4 8-1 to 3/4 8-1a.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not after the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 and NUREG-1432 Comparison

None

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1.26 TS 3.8.1, page 3/4 8-2

Discussion of Changes

The header on this page is being changed to obtain a consistent format. The font on the page and spacing is also being changed which results in creation of a new page 3/4 8-2a. Action e will be moved to the new page.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not after the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 and NUREG-1432 Companison

None 🔨
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1.27 TS 3.8.1, New Action f, and TS 3.8.2, New Action b, Separate Fuel Oil Storage System

Discussion of Changes

ANO-1 and ANO-2 share a common above ground fuel oil storage tank (T-25). In addition each unit has separate fuel storage tanks (T-57A/B for ANO-1 and 2T-57A/B for ANO-2) that supply fuel oil to the day tanks associated with each emergency diesel generator (EDG). The fuel oil sample is required of the fuel storage tanks (T-57A/B and 2T-57A/B). The above ground tank is typically aligned by gravity feed to the fuel storage tanks of both units.

The proposed change to TS 3.8.1 and TS 3.8.2 will include a new Action L and b, respectively that will address the required action associated with fuel of properties outside the limits of the Diesel Fuel Oil Testing Program (PTS 6.5.13). A note will be added to the new Action f that will allow separate entry for each EDG.

Administrative Changes

A10 PTS 4.8.1.1.f.4 and PTS 4.8.1.2.b.4 provide the administrative direction associated with actions f.1, f.2, and f.3.

Technical Changes – More Restrictive

M6 PTS 3.8.1.1, Action f.3 and PTS 3.8.1.2 Action b.3 will allow 30 days to restore stored fuel oil properties if the new fuel oil has been added to the storage tank and the new fuel oil sample results were outside the limits specified by the diesel fuel oil testing program. The sampling of new fuel oil prior to addition to the storage tanks provides a means of determining whether the new fuel oil is of the appropriate grade and has not been contaminated with substances that would have an immediate detrimental impact on diesel engine operation. Additionally, these Actions are included to provide a limited restoration time in the event new fuel oil is added and subsequent test of the new fuel oil are discovered to be out of limits. This is an additional restriction on operation consistent with NUREG-1432 and the ANO-1 TSs.



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1.27 New 3.8.1, Action f, and new 3.8.2, Action b, Separate Fuel Oil Storage System (continued)

Technical Changes – Less Restrictive

- L4 PTS 3.8.1.1. Action f.1 and PTS 3.8.1.2 b.1 will allow the fuel storage tanks to contain less than 22,500 gallons of fuel for up to 48 hours as long as the volume of the individual storage tank is greater than 17,446 gallons. When the volume is between 17,446 and 22,500 galions, only the storage tank will be declared inoperable, the diesel generator will remain operable. Therefore, the PTS will allow an additional 48 hours to restore the level prior to declaring the associated diesel generator inoperable. Each fuel oil storage tank, when 100% full (22,500 gallons), contains sufficient volume for approximately 3 ½ days of operations. Therefore, the combined storage capacity, 45,000 gallons, ensures a sufficient supply of fuel oil for seven days of full load operations. Only one diesel generator is required to supply the components needed for accident mitigation. The proposed change introduces a lower volume of 17,446 gallons. This value, when summed with the contents of the other storage tank (i.e., a total of 34,982 gallons) ensures six days of fuel oil is available. The 48 hours allow adequate time to get a tanker truck to the site, perform the required sampling, and restore the volume. During the proposed additional time associated with the reduced level, the diesel generator is capable of performing its intended function and is therefore not inoperable. The fuel oil volume may be less than desirable for this short period due to the low probability that an event would occur for which the diesel generator would be required.
- L5 PTS 3.8.1.1, Action f.2 and PTS 3.8.12.b.2 will allow an additional seven (7) days to restore the stored fuel oil total particulates to be within the required limits prior to declaring the associated diesel generator inoperable. Normally, trending of particulate levels allows sufficient time to correct high particulate levels prior to reaching the limit of acceptability. Poor sample procedures, contaminated sampling equipment, and errors in laboratory analysis can produce failures that do not follow a trend. Since the presence of particulate concentration is unlikely to change significantly between surveillance intervals, and proper engine performance has been recently demonstrated (within 31 days), it is prudent to allow a brief period prior to declaring the associated diesel generator inoperable. The 7 day Action allows for further evaluation, re-sampling, and re-analysis of the diesel generator fuel oil.

Technical Changes - Removal of Details

None

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1.27 TS 3.8.1, New Action f, and TS 3.8.2, New Action b, Separate Fuel Oil Storage System (continued)

Discussion of Differences

ANO-1 Comparison

The proposed changes result in the ANO-1 ITS and ANO-2 TSs being similar. The ANO-1 ITS has a separate TS 3.8.3 for Diesel Fuel Oil and Starting Air which the proposed change does not create. However, the proposed change does create new TS 3.8.1, Action f and TS 3.8.2, Action b that adopt the actions that are contained in the ANO-1 ITS 3.8.3 for the stored diesel fuel oil.

NUREG-1432 Comparison

NUREG-1432 has separate TSs for the diesel generator and the diesel generator fuel oil systems. The proposed change adopts the actions associated with the fuel oil system that are addressed in NUREG-1432 TS 3.8.3, however does not adopt the entire TS. The intent of the actions for fuel oil contained in the NUREG is met by the proposed change.

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1.28 3.8.1, Surveillance Requirements, page 3/4 8-2a

SRs 4.8.1.1.1 and 4.8.1.1.2, as well as the associated notes contained on the current page 3/4 8-2a will be relocated to page 3/4 8-2b.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

None

Discussion of Differences

ANO-1 and NUREG-1432 Comparison

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1.29 SR 4.8.1.1.2.b, Diesel Fuel Oil Testing Program

Discussion of Changes

The proposed change will revise SR 4.8.1.1.2.b to reflect the creation of the Diesel Fuel Oil Testing Program (PTS 6.5.13). The proposed change will require that both new and stored fuel oil are tested while the current SR requires testing of only the stored fuel oil. See section 1.63 for a discussion of the new Diesel Fuel Oil Testing Program (PTS 6.5.13).

Administrative Changes

None

Technical Changes – More Restrictive



- M10 CTS SR 4.8.1.2 requires that the A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1 and 4.8.1.1.2 except for Requirement 4.8.1.1.2.a.5. Therefore, SR 4.8.1.1.2.b must be performed to satisfy SR 4.8.1.2. The current SR 4.8.1.1.2.b does not require sampling of new fuel oil prior to adding it to the storage tank. A new diesel fuel oil testing program is proposed as PTS 6.5.13 and includes a requirement to sample new fuel oil (see Section 1.63).
- M12 The proposed change will require testing of new and stored fuel oil while the current SR only requires testing of the stored fuel oil. Testing of the new fuel oil will provide added assurance that the fuel is acceptable prior to placing it in the bulk storage tank.

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

LA1 CTS 4.8.1.1.2.b – This information will be moved to a licensee controlled document, the Diesel Fuel Oil Testing Program (DFOTP). A description of the programs will be incorporated into the Administrative Controls section 6.0. This information provides details of the method of implementation which are not directly pertinent to actual requirements. Since these details are not necessary to adequately describe the actual regulatory requirement, they can be moved to a licensee controlled document without a significant impact on safety. Placing these details in controlled documents provides adequate assurance that they will be maintained. The details of the DFOTP will be controlled by 10 CFR 50.59.

Discussion of Differences

ANO-1 and NUREG-1432 Comparison

Neither ANO-1 ITS or NUREG-1432 have a specific SR in TS 3.8.1 that requires that new and stored fuel oil are tested in accordance with the Diesel Fuel Oil Testing Program. Due to the differences in format, the intent of the ANO-2 PTS is consistent with the philosophy of ITS.

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1.30 SR 4.9.1.1.2, Fuel Handling Area Ventilation

Discussion of Changes

The current SR provides the testing criteria for the fuel handling area filtration system. The filter testing program will be relocated to PTS 6.5.11. The current SR will be revised to direct testing of the fuel handling area ventilation filtration system in accordance with PTS 6.5.11. Several deletions are proposed to the current SR in order to accommodate the relocation to PTS 6.5.11. See section 1.64 for the markup of changes and associated discussion.

Administrative Changes

A1 The designated change represents a non-technical non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include wording preference convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 and NUREG-1432 Comparison

ANO-1 ITS (SR 3.7.12.2) and NUREG-1432 (SR 3.7.14.2) have a similar SR as PTS SR 4.9.11.2. Due to the format differences between ITS and CTS minor differences exist.

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1.31 Administrative Controls Section 6.1, Responsibility

Discussion of Changes

The proposed change to CTS 6.1.1 and CTS 6.1.2 will eliminate reference to ANO-2 and make other minor administrative changes.

Administrative Changes

- A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.
- A13 The change modified the title of "ANO-2 plant manager to "Plant Manager Operations." This change is an organization change at ANO that resulted in one plant manager between the two units.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

None.

Technical Changes - Removal of Details

Discussion of Differences

ANO-1 Comparison

The proposed change is consistent with the words contained in the ANO-1 ITS taking into account the changes proposed in a letter to the NRC dated March 13, 2002 (reference 6) and approved in June 2002 (reference 7).

NUREG-1432

NUREG-1432 includes a requirement for the plant manager or his designee to approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety. This will not be adopted. ANO-2 TS Amendment No. 160 dated April 25, 1995 eliminated this detail. Approval requirements for such procedures and modifications are delineated in the QAPM as discussed in the request for and approval of amendment 160. This change is consistent with the current license basis.

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1.31 Administrative Controls Section 6.1, Responsibility (continued)

Discussion of Differences NUREG-1432 (continued)

NUREG 5.1.2 identifies the "Shift Supervisor" as being responsible for the control room command function. This is not consistent with the current practice at ANO and will not be adopted. The "command and control" functions are currently assigned to a Control Room Supervisor who is not limited to the area of the control room envelope. A Shift Manager is also provided who implements many of the functions of the NUREG "Shift Supervisor" and who typically remains in the control room. Further, the command structure is adequately controlled by procedures and "turnover" requirements in the ITS are unnecessary. The proposed changes are consistent with the current license basis.

1.32 Administrative Controls Section 6.2.1, Offsite and Onsite Organizations

Discussion of Changes

The changes to 6.2.1 delete the specific reference to ANO-2 and make other preferred wording changes.

Administrative Changes

- A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.
- A13 The change modified the title of "ANO-2 plant manager" to "Plant Manager Operations." This change is an organization change at ANO that resulted in one plant manager between the two units.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

None.

Technical Changes – Removal of Details

Discussion of Differences

ANO-1 Comparison

ANO-2 proposed TS is consistent with the wording in ANO-1 ITS. For PTS 6.2.1.b, the proposed change is consistent with the wording contained in the ANO-1 ITS conversion taking into account a proposed change included in a letter dated March 13, 2002 (reference 6) and approved by the NRC in June 2002 (reference 7).

1.32 Administrative Controls Section 6.2.1, Offsite and Onsite Organizations (continued)

NUREG-1432 Comparison

The ANO-2 proposed change is inconsistent with the wording contained in NUREG-1432. NUREG-1432 refers to "nuclear power plant." This difference is acceptable as "unit" more appropriately reflects separation of ANO-1 and ANO-2.

NUREG-1432 5.2.1.a refers to "plant-specific" titles while the proposed change (PTS 6.2.1.a) refers to "unit specific" titles. This is a minor editorial difference. With the two units at the ANO location, it is appropriate to designate them as "units" and the entire facility as the "plant."

Only minor differences exist between the proposed change to TS 62.1 b and NUREG 5.2.1.b as follows:

- The title of "plant manager" is "Plant Manager Operations" at ANO.
- The reference to "unit" rather than "plant" is more appropriate for ANO since it is a dual unit site.

PTS 6.2.1.c uses the word "unit" instead of the word "plant." which is used in NUREG-1432 5.2.1.c. This is acceptable, as ANO is a two-unit site.

The proposed change to TS 6.2.1.c includes "The specified corporate executive shall be documented in the SAR, and," which is not included in NUREG-1432. This sentence is in the current TS and is consistent with the ANO-1 ITS. No change is proposed to the CTS as related to this sentence.

The proposed changes to TS 6.2.1.d are consistent with NUREG-1432.

1.33 Administrative Controls Section 6.2.2, Unit Staff

Discussion of Changes

The proposed changes reorganize the section and provide clarity for the ANO site. In addition, many of the requirements are being removed because they duplicate requirements provided by the Code of Federal Regulations (CFR).

Administrative Changes

- A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not after the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.
- A11 This information will be removed from the PTS since it duplicates requirements provided in the regulations. Such duplication is unnecessary and results in additional administrative burden to revise the duplicate TS when these regulations are revised. Since removal of the information results in no actual change in the requirements, removal of the duplicative information is considered an administrative change. Further, change to the requirements will be controlled by the NRC

CTS 6.2.2.a		10 CFR 50 54(m)(2)()
CTS 6.2.2.b		10 CFR 50.54(m)(2)(iii) and 50.54(k)
CTS 6.2.2.c	a W	10 CFR 50.54(m)(1) and (m)(2)(iii)
CTS 6.2.2.e		10 CFR 50.54(m)(2)(iv)
	VICTORIA.	777AW

A12 CTS Table 6.2-1 currently contains the requirements that are proposed to be located at PTS 6.2.2.a. This is an administrative change that simply relocates the CTS information. Otherwise no change is proposed.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

- L6 PTS 6.2.2.d will allow the radiation protection position to be vacant for not more than 2 hours in order to provide for an unexpected absence. The proposed change is reasonable. A similar allowance is granted to licensed operators and is included in the CTS as the # Note associated with Table 6.2-1.
- L7 PTS 6.2.2.g will allow the Shift Technical Advisor (STA) to support the shift crew instead of only the shift supervisor. The change provides more flexibility to the STA and the crew and is consistent with the actual practice of the STA.

1.33 Administrative Controls Section 6.2.2, Unit Staff (continued)

Technical Changes – Less Restrictive (continued)

L8 PTS 6.2.2.c will allow the STA position to be vacant for up to two hours in order to provide for an unexpected absence. This will allow needed staffing flexibility. Prior to the approval of TS Amendment 209 (Safety Evaluation Report (SER) dated August 26, 1999), the requirement to have an STA was included in Table 6.2-1 and the associated # Note that allowed for unexpected vacancies applied. The two hour allowance for vacancy was inappropriately disassociated from the STA in Amendment 209.

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 Comparison (CTS 6.2.2.a and PTS 6.2.2.b)



The proposed change is consistent with ANO-1 ITS 522 a and 5.2.2 b taking into account the proposed change submitted to the NRC dated March 13, 2002 (reference 6) and subsequently approved in June 2002 (reference 7).

NUREG-1432 Comparison (CTS 6.2.2.a and PTS 6.2.2 b)

The proposed changes to TS 6.2.2.a and 6.2.2.b differ slightly from NUREG-1432 due to the need to identify shift manning requirements for "one unit, one control room." In addition, ANO-2 currently requires three non-licensed operators when the reactor is operating in MODES 1, 2, 3, or 4. ANO-2 desires to retain the current licensing bases.

ANO-1 Companison (CTS 6.2.2.b)

A similar requirement was contained in the ANO-1 CTS prior to conversion. It was deleted based on being redundant to the regulations. Therefore, the proposed change is consistent with ANO-1s ITS conversion.

NUREG-1432 Comparison (CTS 6 2.2.b)

NUREG-1432 does not contain a requirement to maintain at least one licensed Operator in the control room when fuel is in the reactor. Therefore, the proposed change is consistent with NUREG-1432.

ANO-1 Comparison (CTS 6.2.2.c)

ANO-1 had a similar CTS which was deleted when converting to ITS since the CTS duplicated requirements provided in the regulations. Therefore, this change is consistent with the ANO-1 ITS conversion.

NUREG-1432 Comparison (CTS 6.2.2.c)

The NUREG does not contain a requirement similar to ANO-2 CTS.

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1.33 Administrative Controls Section 6.2.2, Unit Staff (continued)

Discussion of Differences (continued)

ANO-1 Comparison (PTS 6.2.2.c)

The proposed change is consistent with the ANO-1 ITS conversion specification 5.2.2.c.

NUREG-1432 Comparison (PTS 6.2.2.c)

The NUREG does not include the phrase "for one unit, one control room." The phrase is needed to designate the appropriate table in 10 CFR 50.54(m)(2)(i)

ANO-1 Comparison (CTS 6.2.2.d)

The proposed change is consistent with the approved ANO-1 ITS conversion.

NUREG-1432 Comparison (CTS 6.2.2.d)

PTS 6.2.2.d will be retained as "an individual qualified in radiation protection procedures." NUREG-1432 5.2.2.c states, "A radiation protection technician shall be on site when fuel is in the reactor." The current license bases will be retained to continue to allow the greater flexibility provided by the CTS for fulfilling this position requirement.

ANO-1 Comparison (CTS 6.2.2.e)

The ANO-1 ITS does not include a requirement similar to the ANO-2 CTS. Therefore, the change is consistent with ANO-11TS

NUREG-1432 Comparison (CTS 6.2.2.e)

NUREG-1432 does not contain a requirement similar to CTS 6.2.2.e. Therefore, the change is consistent with NUREG-1432.

ANO-1 Comparison (CTS 6.2.2.f and PTS 6.2.2.g)

The proposed change is consistent with the ANO-1 approved ITS wording.

NUREG-1432 Comparison (CTS 6.2.2.f and PTS 6.2.2g)

Minor wording differences exist between the NUREG and the proposed change. The ANO-2 current licensing basis specifies that the position is only required during MODES 1, 2, 3, and 4, which will be retained in the proposed change.

ANO-1 Comparison (CTS 6.2.2.g and PTS 6.2.2.e)

The proposed change is consistent with the ANO-1 ITS.

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1.33 Administrative Controls Section 6.2.2, Unit Staff (continued)

Discussion of Differences (continued)

NUREG-1432 Comparison(CTS 6.2.2.g and PTS 6.2.2.e)

The current licensing basis and proposed change reference Generic Letter (GL) 82-12, which contains the requirements set forth in NUREG-1432 specification 5.2.2.d. Therefore, the proposed change is consistent with the intent of NUREG-1432.

ANO-1 and NUREG-1432 Comparison (CTS 6.2.2.h and PTS 6.2.2.h



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1.34 Administrative Controls Section page 6-3

Discussion of Changes

Page 6-3 will be deleted.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes - Removal of Details

None

None

Discussion of Differences

1.35 Administrative Controls Table 6.2-1, Minimum Shift Crew Composition

Discussion of Changes

This table and the associated * note will be deleted. The # note will be relocated to PTS 6.2.2.c. See Section 1.33 for the discussion of changes associated with the # note.

Administrative Changes

A11 This information will be removed from the PTS since it duplicates requirements provided in the regulations. Such duplication is unnecessary and results in additional administrative burden to revise the duplicate TS when these regulations are revised. Since removal of the information results in no actual change in the requirements, removal of the duplicative information is considered an administrative change. Further, change to the requirements will be controlled by the NRC.

Table 6.2-1 10 CFR 50.54(m)(2)(i)

- Table 6.2-1 Note * 10 CFR 50.54(m)(2)(iv)
- A12 CTS Table 6.2-1 currently contains the requirements that are proposed to be located at PTS 6.2.2.a. This change relocates the CTS information.

Technical Changes – More Restrictive

None

Technical Changes - Less Restrictive

None

None

Technical Changes - Removal of Details

Discussion of Differences

ANO-1 Comparison (CTS Table 6 2-1)

The proposed change is consistent with ANO-1 ITS. See previous discussion under CTS 6.2.2.a.

NUREG-1432 Companison (CTS Table 6.2-1)

See previous discussion under CTS 6.2.2.a.

ANO-1 and NUREG-1432 Comparison (CTS Table 6.2-1 * note)

The proposed change is consistent with the ANO-1 ITS and NUREG-1432.

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1.35 Administrative Controls Table 6.2-1, Minimum Shift Crew Composition (continued)

Discussion of Differences (continued)

ANO-1 Comparison (CTS Table 6.2-1 # note)

The proposed change is consistent with the ANO-1 ITS.

NUREG-1432 Comparison (CTS Table 6.2-1 # note)

The proposed change is consistent with the intent of NUREG 1432, although specifically references the requirements 10 CFR 50.54(m)(2)(i) for one unit one control room. See previous discussion related to CTS 6.2.2.a.



1.36 Administrative Controls Section 6.3, Unit Staff Qualifications

Discussion of Changes

The requirement to meet the minimum qualifications of ANSI N18.1, 1971 for unit staff qualifications will be changed to ANS 3.1-1978.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

M7 PTS 6.3.1 will be updated to reflect the latest changes to the Duality Assurance Program Manual (QAPM) approved by the NRC on November 6, 1998 (TAC No. M97893). Unit staff qualifications are revised to reflect commitments to ANSI ANS 3.1-1978 (in lieu of ANSI N18.1-1971). Additional experience and education requirements are imposed for certain positions due to this change. This change is an additional restriction on unit operation.

Technical Changes – Less Restrictive

None

Noné

Technical Changes – Removal of Details

Discussion of Differences

ANO-1 Comparison

The proposed change is consistent with the ANO-1 ITS.

NUREG-1432 Comparison

The proposed change is consistent with the intent of NUREG-1432, specification 5.3.1.

NUREG-1432 also includes specification 5.3.2 as follows:

"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 TS 5.3.1, perform the functions described in 10 CFR 50.54(m)."

Proposed TS 6.2.2.b describes the shift composition for licensed operators and references 10 CFR 50.54(m). Due to this reference it is clear that ANO-2 licensed operators must perform the functions of 10 CFR 50.54(m). Therefore, this NUREG-1432 specification is not adopted.

1.37 Administrative Controls Section, Page 6-5

Discussion of Changes

The markup of this page includes in part the changes to Section 6.3, Unit Staff Qualifications which were previously discussed.

The markup page also includes section title additions for section 6.4, Procedures, 6.5, Programs, 6.5.1, Offsite Dose Calculation Manual (ODCM), 6.5.2, Primary Coolant Sources Outside Containment, 6.5.3, not used, 6.5.4 Radioactive Effluent Controls Program, 6.5.5, Component Cyclic or Transient Limit Program, 6.5.6, not used, 6.5.9, Steam Generator (SG) Tube Surveillance Program, 6.5.10, Secondary Water Chemistry Program, 6.5.11, Ventilation Filter Testing Program (VFTP), 6.5.12, later, 6.5.13, Diesel Fuel Oli Testing Program, 6.5.14, Technical Specifications (TS) Bases Control Program 6.5.15, not used, and 6.5.16, Containment Leakage Rate Testing Program. These changes are place holders and the discussion of changes associated with each will follow.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO 2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include, wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.



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1.38 Administrative Controls Section, Page 6-12a

Discussion of Changes

Section 6.6 which is listed as "DELETED" will be permanently deleted.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not after the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

None

Discussion of Differences

1.39 Administrative Controls Section, 6.7 – Safety Limit Violation

Discussion of Changes

Section 6.7, Safety Limit Violation will be permanently deleted.

Administrative Changes

A11 This information will be removed from the PTS since it duplicates requirements provided in the regulations. Such duplication is unnecessary and results in additional administrative burden to revise the duplicate TS when these regulations are revised. Since removal of the information results in no actual change in the requirements, removal of the duplicative information is considered an administrative change. Further, change to the requirements will be controlled by the NRC.

6.7.1.c 10 CFR 50.36, 10 CFR 50.72 and 10 CFR 50.73

- A14 CTS 6.7 will be deleted. CTS 6.7.1.a is redundant to information included in Section 2.1, Safety Limits.
- A15 CTS 6.7.1.b requires notification of the Vice President, Operations ANO within 24 hours of violating a safety limit. This notification is administratively controlled as part of the ANO corrective action process and will be deleted. This notification is not required to ensure any of the four criteria listed in 10 CFR 50.36. The administrative controls section of Technical Specifications is described in 10 CFR 50.36 as reporting what is necessary to assure operation of the facility in a safe manner. Although this notification will continue to be performed as part of the standard practices for notification, it does not assure the facility is operated in a safe manner. Actions taken in the control room by the control room operators assure the safety of the facility.



ANO-1 and NUREG-1432 Comparison

The proposed change is consistent with the ANO-1 ITS and NUREG-1432.

1.40 Administrative Controls Section 6.8, Procedures and Programs

Discussion of Changes

The TS will be renumbered and renamed as PTS 6.4, Procedures. Several procedure types will be deleted as they are required by Regulatory Guide 1.33. The current TS 6.8.1.a requires that applicable procedures recommended in Appendix A of Regulatory Guide 1.33 shall be established, implemented, and maintained, therefore, listing specific procedure types is unnecessary.

Administrative Changes

- A1 The designated change represents a non-technical non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include wording preference convention adoption; editorial, numbering and formatting changes, and hierarchy structure.
- A22 CTS 6.8.1.a requires that written procedures shall be established, implemented, and maintained for the applicable procedures recommended in Regulatory Guide (RG) 1.33, Revision 2, Appendix A. This requirement will be retained as PTS 6.4.1.a. CTS 6.8.1.b, 6.8.1.c, and 6.8.1.h require that procedures for refueling operations, surveillance and test activities of safety related equipment, and new and spent fuel storage be established, implemented, and maintained. These procedures are included in RG 1.33 and therefore duplicated by the requirements of PTS 6.4.1 a CTS 6.8.1.b, 6.8.1.c, and 6.8.1.h will be deleted.

Technical Changes More Restrictive

- M8 PTS 64 d Requirements will be included to provide procedures for each of the programs identified in PTS 6.5. The programs included in this section are based on requirements in the CTS. The proposed change is consistent with the NUREGs and is an additional restriction on unit operation. CTS 6.8.1.i, ODCM and PCP implementation will be relocated to the Programs section. Written procedures for the ODCM will be required by PTS 6.4.d. Therefore, the ODCM and PCP do not need to be listed separately in section 6.4
- M9 PTS 6.4.b. This is a new requirement to maintain the emergency operating procedures in accordance with the requirements in NUREG-0737 and NUREG-0737, Supplement, as stated in Section 7.1 of Generic Letter 82-33. ANO-2 currently maintains these procedures as required by these documents.

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

1.40 Administrative Controls Section 6.8, Procedures and Programs (continued)

Discussion of Differences

ANO-1 and NUREG-1432 Comparison (CTS 6.8.1.a)

The proposed re-ordering of the words is consistent with the ANO-1 ITS 5.4.1.a and NUREG-1432 5.4.1.a.

ANO-1 Comparison (CTS 6.8.1.b, 6.8.1.c, and 6.8.1.h)

The proposed change is consistent with the ANO-1 ITS. None of these advities are described, other than as required by RG 1.33, in the ANO-1 ITS.

NUREG-1432 Comparison (CTS 6.8.1.b, 6.8.1.c, and 6.8.4 h)

The proposed change is consistent with NUREG-1432 which does not include separate requirements for written procedures for refueling operations, surveillance and test activities of safety related equipment, or new and spent fuel storage, except as required by RG 1.33.

ANO-1 and NUREG-1432 Comparison (CTS 6.8.41)

ANO-1 ITS 5.4.1.c and NUREG-1432 specification 5.4.1.d are the same as the proposed change.

ANO-1 Comparison (CTS 6.8.1.g)

ANO-1 does not have a core protection calculator and therefore does not require a similar TS.

NUREG-1432 Comparison (CTS 6.8.1.g)

The proposed change with the minor editorial changes is consistent with the wording of NUREG-1432 specification 5.4.1.f

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1.40 Administrative Controls Section 6.8, Procedures and Programs (continued)

Discussion of Differences

ANO-1 Comparison (CTS 6.8.1.i)

The ANO-1 ITS do not include a reference to written procedures related to the ODCM or the PCP other than as delineated in specification 5.4.1.d, which requires written procedures for all the programs included Section 5.5. Therefore, this change is consistent with the ANO-1 ITS.

NUREG-1432 Comparison (CTS 6.8.1.i)

NUREG-1432 does not include a reference to written procedures related to the ODCM or the PCP other than as delineated in specification 5.4.1.e, which requires written procedures for all the programs included in Section 5.5. Therefore, this change is consistent with NUREG-1432.

NUREG-1432 5.4.1.c

NUREG-1432 specification 5.4.1.c requires the establishment, implementation, and maintenance of written procedures covering "quality assurance for effluent and environmental monitoring." This will not be adopted. 10 CFR 50 and Appendix I of Part 50 require procedures for effluent and environmental monitoring. The Quality Assurance Program Manual (QAPM) is considered applicable to the implementation procedures for effluent and environmental monitoring for the station. A periodic audit of the radiological environmental monitoring program is implemented through the current QAPM Section c.2.a.f. These controls are considered sufficient since they are not directly pertinent to obviate the possibility of an abnormal situation or event that might result in an immediate threat to public health and safety. Since these details are also not necessary to adequately describe the pertinent regulatory requirement, they are not mandated by 10 CER 50.36, and they do not meet the criteria in 10 CFR 50.36, they can be appropriately retained in licensee controlled documents without a significant impact on safety. Retaining these requirements in controlled documents also provides adequate assurance that they will be maintained. Changes to the QAPM are controlled by 10 CFR 50.54. Since the controls are consistent with the CA controls for other activities, the specific listing for effluent and environmental monitoring is unnecessary.

1.41 Administrative Controls Section 6.8.4.a, Radioactive Effluent Controls Program

Discussion of Changes

CTS 6.8.4.a, Radioactive Effluent Controls Program, will be retained as specification 6.5.4. Minor changes are proposed which are classified as A1. "Beyond site boundary" will be added to CTS 6.8.4.a.10) and is considered preferred wording. An allowance to apply SR 4.0.2 and 4.0.3 will be added.

Administrative Changes

- A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include wording preference; convention adoption; editorial, numbering and formatting changes and hierarchy structure
- A16 PTS 6.5.4 A statement regarding the applicability of SR 4.0.2 and 4.0.3 will be added. This statement is consistent with the intent of performing periodic surveillances. Since no change to regulatory requirements is made this change is considered administrative.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

None

Technical Changes - Removal of Details

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1.41 Administrative Controls Section 6.8.4.a, Radioactive Effluent Controls Program (continued)

Discussion of Differences

ANO-1 Comparison (CTS 6.8.4.a)

The ANO-2 proposed change is consistent with ANO-1 ITS 5.5.4 based on the inclusion of the ANO-1 proposed changes to this specification which were submitted to the NRC and approved by the NRC (references 6 and 7).

NUREG-1432 Comparison (CTS 6.8.4.a)

NUREG-1432 references Appendix B, Table 2, Column 2 of 10 CFR 20 1001-20.2402, which will not be adopted with the ANO-2 change. The ANO-2 CTS references 10 CFR 20.1302 and 10 CFR 20, Appendix B, Table II, Column 1 and 2. The existing software available at ANO does not support conversion to the revised 10 CFR 20 requirements. Fabrication, purchase, and installation of new software is expected to reach as much as \$300,000. Therefore, Entergy is requesting that the limitation requirements of the CTS be retained in field of the revised 10 CFR 20 requirements of the NUREG.

1.42 Administrative Controls Section 6.8.4.b, Component Cyclic or Transient Limit Program

Discussion of Changes

The Component Cyclic or Transient Limit Program (CTS 6.8.4.b) will be retained as PTS 6.5.5 and includes minor punctuation and preferred wording changes which are classified as A1.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not after the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 Comparison

The ANO-11TS does not include this requirement.

NUREG-1432 Comparison

CTS 6.8.4.b is consistent with the wording contained in NUREG-1432.

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1.42 Administrative Controls Section 6.91, Routine Reports

Discussion of Changes

The introductory paragraph contained in Section 6.9.1 will be deleted as it is redundant to existing regulations.

Administrative Changes

A11 This information will be removed from the PTS since it duplicates requirements provided in the regulations. Such duplication is unnecessary and results in additional administrative burden to revise the duplicate TS when these regulations are revised. Since removal of the information results in no actual change in the requirements, removal of the duplicative information is considered an administrative change. Further, change to the requirements will be controlled by the NRC.

6.9.1 10 CFR 50.4 Technical Changes – More Restrictive None Technical Changes – Less Restrictive None Technical Changes – Removal of Details None Discussion of Differences <u>ANO-1 and NUREG-1432 Companison</u> The proposed change is consistent with the ANO-1 ITS and NUREG-1432. Attachment 1 to 2CAN0103XX Page 65 of 100

1.43 Administrative Controls Section 6.91.1, 6.9.1.2, and 6.9.1.3, Startup Report

Discussion of Changes

The details related to the Startup Reports will be deleted.

Administrative Changes

None

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details



LA2 This information will be moved to the Technical Requirements Manual (TRM). The information provides details of design or process which are not directly pertinent to the actual requirement, i.e., Definition, Limiting Condition for Operation, or Surveillance Requirement, but rather describe additional unnecessary details such as an acceptable method of compliance. Since these details are not necessary to adequately describe the actual regulatory requirement, they can be moved to a licensee controlled document without a significant impact on safety. Placing these details in controlled documents provides adequate assurance that they will be maintained. Changes to the TRM are governed by 10 CFR 50.59.

Discussion of Differences

ANO-1 and NUREG-1432 Companison

The proposed change is consistent with the ANO-1 ITS and NUREG-1432.

1.44 Administrative Controls Section 6.91.4, Annual Reports

Discussion of Changes

This introductory paragraph related to the Annual Report will be deleted.

Administrative Changes

A17 CTS 6.9.1.4 – This section provides an introductory paragraph into CTS 6.9.1.5, which includes a listing of the required annual reports. The paragraph will be deleted with the submittal date moved to the individual report. The individual reporting criteria adequately describe the required data and therefore this paragraph serves no purpose.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 ITS Comparison

There is no introductory paragraph in the ANO-1 ITS Reporting Requirements. The submittal date is included in each reporting requirement. This is consistent with the proposed deletion of CTS subsection 6.9.1.4.

NUREG-1432 Comparison

NUREG-1432 includes an introductory sentence, which will not be included in the proposed change. Per NUREG-1432, the reports listed in section 5.6 are submitted in accordance with 10 CFR 50.4. The reports identified in this section are governed in part by 10 CFR 50.4 but also by other regulations. Therefore, this introductory sentence will not be included, as the individual reporting requirements provide adequate guidance.

1.45 Administrative Controls Section 6.91.5, Occupational Radiation Exposure Report

Discussion of Changes

This CTS provides guidance related to the Occupational Radiation Exposure Report. This specification will be relocated to proposed section 6.6.1.

The report is currently submitted annually prior to March 1. This date will be changed to April 30 of each calendar year. The April 30th date is consistent with the revisions to 10 CFR 20 and is provided to supplement the information require by 10 CFR 20.2206 (b), which is filed on or before April 30th in accordance with 10 CFR 20.2206 (c). The supplemental information report submittal date will therefore be revised to correspond with the required submittal date of the report being supplemented.

In addition, the CTS will be revised to reflect the correct 10 CFR 20 terminology for the units of occupational exposure.

The current note 1, which defines the allowance for a common submittal to be made, will be added to the appropriate annual reports.

The current note 2 will be modified to reflect the current regulation and included within the specification rather than as a separate note.

Administrative Changes

- A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption, editorial, numbering and formatting changes; and hierarchy structure.
- A18 PTS 6.6.1 The proposed change will reflect the correct 10 CFR 20 terminology for the units of occupational exposure. A statement limiting the report scope to those persons monitored will be added as a statement of the obvious. Lastly, the pocket dosimeter will be revised to refer to a pocket ionization chamber and the electronic dosimeter will be specified as an additional means of collecting the exposure data. These changes are considered purely administrative since they result in no relaxation of requirements, result in compliance with 10 CFR 20, more accurately reflect the principal of operation of the pocket dosimeter and acknowledge industry usage of advanced dosimetry devices. These changes are consistent with 10 CFR 20 and NUREG-1432.

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1.45 Administrative Controls Section 6.91.5, Occupational Radiation Exposure Report (continued)

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

L9 CTS 6.9.1.5 defines the requirements for Occupational Radiation Exposure Report. The submittal date for this report will be revised such that the report is submitted by April 30 of each calendar year. This change is consistent with the comprehensive revisions to 10 CFR 20. The date of submittal for the Annual Occupational Exposure Report is revised from March 1 to April 30. This report is provided to supplement the information required by 10 CFR 20.2206(b) which is filed on or before April 20 in accordance with 10 CFR 20.2206 (c). The supplemental information report submittal date is therefore revised to correspond to the required submittal date of the report being supplemented.

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 ITS and NUREG-1432 Comparison

The proposed wording is consistent with the ANO-11TS and NUREG-1432.

1.46 Administrative Controls Section 6.9.1.5.b, Steam Generator Tube Inservice Inspections

Discussion of Changes

This reporting requirement will be retained as proposed TS 6.6.7 and renamed as Steam Generator Tube Surveillance Reports. The details of the report are contained in CTS 4.4.5.5 and will also be relocated to proposed TS 6.6.7.

CTS 4.4.5.5.c of the Steam Generator (SG) Tube Inservice Inspection Report requires submittal of a Special Report pursuant to specification 6.9.2. Specification 6.9.2 will be deleted and reference to this special report will be replaced with a simple instruction to submit the report to the Commission. Written communication to the NRC is described in 10 CFR 50.4. Therefore, the specific details of addressees, etc. will not be included in the specification. This is considered an editorial administrative change.

Administrative Changes

- A6 Specification 6.9.2, which requires the submittal of a special report to the Commission if various systems cannot be restored, will be deleted and thus the reference to it in various specifications will be deleted. Written communication to the NRC is described in 10 CFR 50.4 and therefore, the proposed change will only reference that the report should be submitted to the NRC. Guidance in 10 CFR 50.4 adequately ensures that the regional office will receive a copy of the report.
- A20 CTS 4.4.5.5 will be moved to PTS 6.6.7 and will replace the wording in CTS 6.9.1.5.b, which requires that the criteria specified in CTS 4.4.5.5 be included in the report. The relocation results in no change to the reporting requirements.

Technical Changes – More Restrictive



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1.46 Administrative Controls Section 6.9.1.5.b, Steam Generator Tube Inservice Inspections (continued)

Discussion of Differences

ANO-1 ITS Comparison

ANO-1 ITS 5.6.7 describes this reporting requirement. The ANO-2 proposed change differs from the ANO-1 ITS, however, is consistent with the currently approved ANO-2 license basis and consistent with the reviewer's note that is contained in NUREG-1432.

NUREG-1432 Comparison

NUREG-1432 specification 5.6.9 describes the SG Tube Inspection Report. A reviewer's note states: "Reports required by the Licensee's current licensing basis regarding steam generator tube surveillance requirements shall be included here. An appropriate administrative controls format should be used." The proposed change to the ANO 2 TS is consistent with the current licensing basis and is, therefore, consistent with the reviewer's note contained in NUREG-1432.

1.47 Administrative Controls Section 6.9.1.5.c, Documentation of Pressurizer Safety Valve Challenges

Discussion of Changes

This specification requires documentation of all challenges to pressurizer safety valves. It was added as a result of recommendations articulated in Appendix C.2 (Item C.3.3) of NUREG-0660, Volume 1, "NRC Action Plan Developed As A result of the TMI-2 Accident." This will be deleted.

NUREG-1432 previously contained the requirement to report challenges of pressurizer safety valves as part of the monthly operating report. Technical Specification Traveler number 258 removed this monthly reporting requirement based on Generic Letter 97-02, *"Revised Content of Monthly Operating Report"* and discussions related to the NRC. Performance Indicator Program. The conclusion was that this information was not needed in the assessment of NRC Performance Indicators and as such the requirement to include information related to challenges of the pressurizer safety valves in the monthly operating report was not needed. The NUREG does not require reporting pressurizer safety valve challenges annually. Although the NUREG previously required a monthly report of any pressurizer safety valve challenges, Entergy took exception to the monthly reporting requirement in a February 1999 request for additional information related to the administrative controls of the ANO-1 and ANO-2 TSs (reference 2). Entergy continued to require the annual report. It is proposed that the reporting requirement for the pressurizer safety valves be deleted. The reason for deletion is consistent with the logic used in the above referenced traveler even though the reporting frequencies differ.

In 1997 with the issuance of ANO-2 TS Amendment 180 (reference 6), which added the Low Temperature Overpressure Protection (LTOP) requirements ANO committed to include within the report of challenges to the pressurizer safety valves a report of any challenges to the LTOP valves. This commitment will be retained and thus any challenges to the LTOP valves will be reported.

Administrative Changes	$\langle y \rangle \langle y \rangle$
None	N.
Technical Changes – Mor	re Restrictive
None	1 - Colore -
Technical Changes - Les	s Restrictive
None	

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1.47 Administrative Controls Section 6.9.1.5.c, Documentation of Pressurizer Safety Valve Challenges (continued)

Technical Changes – Removal of Details

LA3 CTS 6.9.1.5.c - The reporting of these challenges was incorporated into the CTS in response to Three Mile Island (TMI) Action Item II.K.3.3. This action plan was originally implemented only to provide a venue for data gathering. There is no plant specific safety basis for submitting routine information on the operations of this particular equipment. Technical Specification Task Force (TSTF) Traveler #258 removed this reporting requirement based on Generic Letter 97-02, "Revised Content of Monthly Operating Report" and discussions related to the NRC Performance Indicator Program. The conclusion was that this information was not needed in the assessment of NRC Performance Indicators and as such the requirement to include information related to challenges of the pressurizer safety valves in the monthly operating report was not needed. The NUREG does not require reporting pressurizer safety valve challenges annually. Although the NUREG previously required a monthly report of any pressurizer safety valve challenges, Entergy took exception to the monthly reporting requirement in a February 1999 request for additional information related to the administrative controls of the ANO-1 and ANO-2 TSs (reference 2), Entergy continued to require the annual report. It is proposed that the reporting requirement for the pressunzer safety valves be deleted. The reason for deletion is consistent with the logic used in the above referenced traveler even though the reporting frequencies differ.

In 1997 with the issuance of ANO 2 TS Amendment 180 (reference 6), which added the Low Temperature Overpressure Protection (LTOP) requirements, ANO committed to include within the report of challenges to the pressurizer safety valves a report of any challenges to the LTOP valves. ANO will no longer report challenges to the LTOP valves.

Challenges to either the pressurger safety values or LTOP values that result in a potential impact on safety would be evaluated for reportability under 10 CFR 50.73 and thus reported to the NRC
1.47 Administrative Controls Section 6.9.1.5.c, Documentation of Pressurizer Safety Valve Challenges (continued)

Discussion of Differences

ANO-1 ITS Comparison

This reporting requirement is not described in the ANO-1 ITS, therefore, the proposed change is consistent with the ANO-1 ITS.

NUREG-1432 Comparison

This reporting requirement is not described in NUREG-1432. Increfore, the proposed change is consistent with NUREG-1432.

1.48 Administrative Controls Section 6.9.1.5.e, Specific Activity Analysis Report

Discussion of Changes

This specification requires submittals of reports for specific activity analysis in which the primary coolant exceeds the limits of specification 3.4.8. This will be relocated to specification 6.6.8 with no proposed changes other than the relocation.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not after the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes - Removal of Details

None

Discussion of Differences

ANO-1 JTS Comparison

This reporting requirement is not described in the ANO-1 ITS. It is part of the ANO-2 current licensing basis and as such will be retained.

NUREG-1432 Comparison

This reporting requirement is not described in NUREG-1432. It is part of the ANO-2 current licensing basis and as such will be retained.

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1.49 Administrative Controls Section 6.9.1.6, Monthly Operating Report

Discussion of Changes

This section will be relocated to section 6.6.4.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not after the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 and NUREG-1432 Comparison

The wording in the processed change is consistent with the wording in ANO-1 ITS and NUREG-1432 specification 5.6.4. Attachment 1 to 2CAN0103XX Page 76 of 100

1.50 Administrative Controls Section 6.9.2, Special Reports

Discussion of Changes

This section requires that a special report be submitted to the Administrator of the Regional Office within the time period specified for each of the following:

- ECCS Actuations, Specifications 3.5.2 and 3.5.3
- Inoperable Containment Radiation Monitors, Specification 3.3.3.1
- Steam Generator Tubing Surveillance Category C-3 Results, Specification 4.4.5.5
- Maintenance of Spent Fuel Pool Structural Integrity, Specification 3.7.12
- Inoperable Reactor Vessel Level Monitoring System (RVLMS); Specification 3.3.3.6, Table 3.3-10 Item 14
- Inoperable Main Steam Line Radiation Monitors, Specification 3.3.3.1, Table 3.3-6

The individual specifications will be changed to remove the reference to CTS 6.9.2, which will be deleted. CTS 6.9.2 states that the special reports shall be submitted to the Administrator of the Regional Office. The individual specifications will be changed to state that the reports shall be submitted to the NRC. Written communication to the NRC is described in 10 CFR 50.4. Although the CTS requires that the reports be submitted to the Administrator of the Regional Office only, 10 CFR 50.4 provides distribution requirements for written communications. Therefore, reference to the Administrator of the Regional Office will be deleted. This is an administrative change.

Administrative Changes

- A1 The designated change represents a non-technical, pon-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS) NUREG 1432, Revision 2 This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.
- A11 This information will be removed from the PTS since it duplicates requirements provided in the regulations. Such duplication is unnecessary and results in additional administrative burden to revise the duplicate TS when these regulations are revised. Since removal of the information results in no actual change in the requirements, removal of the duplicative information is considered an administrative change. Further, change to the requirements will be controlled by the NRC.

6.9.2 10 CFR 50.4

Technical Changes – More Restrictive

None

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1.50 Administrative Controls Section 6.9.2, Special Reports (continued)

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 Comparison

A similar change was made to the ANO-1 ITS. The Special Reporting section was deleted. The wording in the individual specification differs slightly. The ANO-2 proposed change will state that the reports shall be submitted to the NRC which is understood in the ANO-1 ITS.

NUREG-1432 Comparison

NUREG-1432 does not contain a section describing the need for special reports in section 5.0. The special reports required by CTS 6.9.2 are ANO-2's current licensing bases and will be included in the individual specifications. Thus, the deletion of CTS 6.9.2 is consistent with NUREG-1432.

1.51 Administrative Controls Section 6.9.3, Radioactive Effluent Release Report

Discussion of Changes

CTS 6.9.3 will be relocated to proposed TS 6.6.3. Minor changes are proposed which include the following:

- The CTS note states in part that "The submittal should combine those sections that are common to both units." In the proposed change, the should will be changed to a "shall." This change is considered administrative.
- CTS 6.9.1.4 required that annual reports covering activities of the unit for the previous calendar year shall be submitted prior to March 1 of each year. The proposed change will change the date of the report to be prior to May 1 of each year. The proposed change is considered purely administrative since there is no relaxation of the requirements and the proposed change is consistent with 10 CFR 20.

Administrative Changes

- A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include, wording preference; convention adoption; editorial, numbering and formating changes; and hierarchy structure.
- A21 CTS 6.9.3 will be revised to reflect the reporting requirements consistent with 10 CFR 20 and minor editorial changes. These changes are considered purely administrative since they result in no relaxation of requirements and result in compliance with 10 CFR 20. These changes are consistent with 10 CFR 20 and NUREG-1432, Rev. 2.

Technical Changes -	- More Restrictive	e 🔨
None		\$.
Technical Changes	- Less Restrictive	2
		•
None		
Technical Changes -	- Rémoval of Det	ails
None	Ŵ	

Discussion of Differences

ANO-1 and NUREG-1432 Comparison

The proposed change is consistent with the wording in the ANO-1 ITS and in NUREG-1432.

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1.52 Administrative Controls Section Page 6-19

Discussion of Changes

This page will be deleted.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not after the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

None

1.53 Administrative Controls Section 6.9.4, Annual Radiological Environmental Operating Report

Discussion of Changes

The proposed change will relocate the Annual Radiological Environmental Operating Report from CTS 6.9.4 to PTS 6.6.2. Very minor administrative changes are proposed to the current wording contained in the note.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include wording preference; convention adoption; editorial, numbering and formatting changes and hierarchy structure

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO 1 and NUREG-1432 Comparison

The wording in the current TS is consistent with the wording contained in the ANO-1 ITS and in NUREG-1432

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1.53 Administrative Controls Section 6.9.5, Core Operating Limits Report

Discussion of Changes

This section will be relocated to section 6.6.5. Minor administrative changes are proposed.

Administrative Changes

- A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not after the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.
- A11 This information will be removed from the PTS since it duplicates requirements provided in the regulations. Such duplication is unnecessary and results in additional administrative burden to revise the duplicate TS when these regulations are revised. Since removal of the information results in no actual change in the requirements, removal of the duplicative information is considered an administrative change. Further, change to the requirements will be controlled by the NRC.

CTS 6.9.5.3 10 CFR 50.4

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

None

Technical Changes - Removal of Details

Discussion of Differences

ANO-1 and NUREG-1432 Comparison

The proposed change is consistent with both the ANO-1 ITS and NUREG-1432. Specifications listed in the proposed 6.6.5.a are explicit to ANO-2.

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1.54 Administrative Controls Section Page 6-22

Discussion of Changes

This page will be deleted.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not after the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

None

1.55 Administrative Controls Section 6.11, Radiation Protection Program

Discussion of Changes

The requirement to maintain procedures for the radiation protection program is included in Regulatory Guide (RG) 1.33. Current TS 6.8.1.a requires that procedures recommended in Appendix "A" of RG 1.33 be established, implemented, and maintained. CTS 6.8.1.a will be retained as PTS 6.4.1 a. The requirement of CTS 6.11 is redundant to PTS 6.4.1.a.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 and NUREG-1432 Comparison

Neither the ANO-1 TS nor NUREG-1432 includes a separate requirement for procedures associated with the radiation protection program.

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1.56 Administrative Controls Section 6.12

Discussion of Changes

Current TS 6.12 will be deleted.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not after the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

None

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1.57 Administrative Controls Section 6.13, High Radiation Area

Discussion of Changes

The proposed change to CTS 6.13 will update the 10 CFR 20 requirements to the requirements and relocate the specification section 6.7. The PTS will also include additional, previously approved, methods for implementation of alternates to the "control device" or "alarm signal" requirements of 10 CFR 20.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not after the requirements of the CTS or RSTS. Examples of this type of change include wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

L10 CTS 6.13 – The requirements for high radiation areas will be revised to include additional previously approved methods for implementation of alternates to the "control device" or "alarm signal" requirements of 10 CFR 20. These alternatives provide adequate control of personnel in high radiation areas as evidenced by NRC issuance of NUREG-1432.

Technical Changes – Removal of Details



Ano-2 is adopting the same wording as is contained in the current ANO-1 TSs. Changes have been made to this specification since the ITS conversion (March 13, 2002 reference).

NUREG-1432 Comparison

The proposed change is very similar to NUREG-1432 with only minor administrative word differences.

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1.58 Administrative Controls Section 6.14, Offsite Dose Calculation Manual

Discussion of Changes

This specification will be relocated to PTS 6.5.1 with only minor wording changes and organizational title changes.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not after the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

LA4 Where possible, plant specific management position titles in the CTS will be replaced with generic titles as provided in ANSI/ANS 3.1. Personnel who fulfill these positions are still required to meet the qualifications detailed in the proposed Specification 5.3. In addition, compliance details relating to the plant specific management positions titles fulfilling the duties of these generic positions will continue to be defined, established, documented and updated in a plant controlled document, such as the QAPM. This approach is consistent with the intent of Generic Letter 88-06 which recommended, as a line item improvement, relocation of the corporate and unit organization charts to licensee controlled documents. The intent of the Generic Letter, and of this proposed change is to reduce the unnecessary burden on NRC and licensee resources being used to process changes due solely to personnel title changes during reorganizations. Since this change does not eliminate any of the qualifications, responsibilities or requirements for these personnel or the positions, the change is considered to be a change in presentation only and is therefore administrative.

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1.58 Administrative Controls Section 6.14, Offsite Dose Calculation Manual (continued)

Discussion of Differences

ANO-1 Comparison

The proposed change is consistent with the ANO-1 ITS.

NUREG-1432 Comparison

The proposed change has only minor wording differences with NUREG-1432 and does not follow the format of NUREG-1432. However, neither the wording nor format differences change the intent of the specification.



1.59 Administrative Controls Section 6.14, Containment Leakage Rate Testing Program

Discussion of Changes

The containment leakage program will be relocated to PTS 6.5.16. Leak testing of the containment purge supply and exhaust isolation valves will be relocated from TS surveillance requirement (SR) 4.6.3.1.4. This action consolidates requirements for leak testing in one location.

CTS SR 4.6.3.1.4 requires verification of leakage rates of the containment purge supply and exhaust isolation valves "prior to exceeding conditions which require establishment of reactor building integrity per TS 3.6.1.1." In the proposed TS, this is reflected by the words, "prior to entering MODE 4 from MODE 5." CTS 3.6.1.1, "Containment Integrity" is applicable in MODES 1, 2, 3, and 4 which requires establishing OPERABILITY of containment, prior to entry into MODE 4. The preferred wording is consistent with the current TS

Administrative Changes

- A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.
- A19 PTS 6.5.16 The "≤0.60 L_a" and *≤0.75 L_a" finits for acceptable reactor building leakage will be revised to "<0. 60 L_a" and "<0.75 L_a" for consistency with the acceptance criteria provided in 10 CFR 50, Appendix J. Therefore, this change has no impact on application of the regulations and is considered administrative.

Technical Changes – More Restrictive None Technical Changes – Less Restrictive None Technical Changes – Removal of Details

None

1.59 Administrative Controls Section 6.14, Containment Leakage Rate Testing Program (continued)

Discussion of Differences

ANO-1 Comparison

The ANO-2 proposed change will be modified to be similar to the ANO-1 ITS with the following exceptions:

- The proposed change does not replace the word "containment" with "reactor building." The title Containment Leakage Rate Testing Program and reference to "containment" instead of "reactor building" is consistent with NUREG-1432. This does not present a change to the current wording contained in the ANO-2 TSs.
- The peak calculated containment internal pressure for the design basis loss of coolant accident for ANO-2 is 58 psig.
- The ANO-2 CTS requires that the maximum allowable containment leakage rate, La, shall be 0.1% of containment air weight per day at Pa This is the current ANO-2 licensing basis and no change is proposed.
- Air lock acceptance criteria is included in the ANO-2 CTS. This is consistent with the currently approved ANO-2 TS and no change is proposed.

NUREG-1432 Comparison

Minor wording differences exist between the ANO-2 proposed TS and NUREG-1432. These differences, however, do not modify the intent of the words contained in NUREG-1432.

NUREG-1432 specification 5.5 16 [OPTION B] does not include the testing requirements related to the containment purge supply and exhaust isolation valves. Relocation of this requirement from CTS 4.6.3.1.4 does not change the intent of the NUREG section. It consolidates the testing requirements in one location

NUREG-1432 specifies Type A leakage rate acceptance criteria of $\leq 0.75 L_a$. The ANO-1 ITS modified this acceptance criteria as described above. The ANO-2 proposed TS is consistent with the ANO-1 ITS and thus differs from NUREG-1432. This is justified above.

NUREG-1432 states, Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J." The ANO-2 CTS states, "The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program." The CTS words, which are consistent with the wording in the ANO-1 ITS, reflect the intent of NUREG-1432. No change is proposed to the CTS words.

1.60 Administrative Controls Section New 6.5.10, Secondary Water Chemistry Monitoring

Discussion of Changes

The Secondary Water Chemistry Monitoring program will be deleted as an FOL condition and added as a PTS 6.5.10. The introductory paragraph will be modified and other minor wording changes are proposed. The FOL condition requires the definition of the monitoring program in plant specific procedures. This requirement will be deleted.

Administrative Changes

- A1 The designated change represents a non-technical non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include wording preference convention adoption; editorial, numbering and formatting changes, and hierarchy structure.
- A3 The Secondary Water Chemistry Monitoring license condition will be moved to an equivalent programmatic requirement in PTS Section 6.5, Programs and Manuals. The requirements of this license condition will be retained in Section 6.5. The PTS programmatic administrative controls specifications are consistent with NUREG-1432 and current plant practice, and meet the intent of the existing license conditions. As such, this change in presentation of existing requirements is purely administrative.
- A23 FOL 2.C.(3) (p) and PTS 6.5 10 -The FOL requirement to define the secondary water chemistry monitoring program in plant procedures will be deleted. PTS 6.4.1.d requires that procedures be written, implemented and maintained for the programs included in specification 6.5 Therefore, inclusion of a requirement to maintain a plant specific procedure to describe the program in PTS 6.5.10 is redundant to the requirement of PTS 6.4.1 d

Technical Changes – More Restrictive

Technical Changes – Less Restrictive None

Technical Changes – Removal of Details

None

None

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1.60 Administrative Controls Section New 6.5.10, Secondary Water Chemistry Monitoring (continued)

Discussion of Differences

ANO-1 and NUREG-1432 Comparison

The proposed change is consistent with the ANO-1 Specification 5.5.10.

NUREG-1432 Comparison

NUREG-1432 describes this program as one which provides controls to inhibit low pressure turbine disc stress corrosion cracking as well as Steam Generator (SG) tube degradation. The current ANO-2 FOL requirement does not include the words that the program inhibits low pressure turbine disc stress corrosion cracking. The proposed omission of the wording related to the stress corrosion cracking on the low pressure turbine disc is consistent with the approved wording in ANO-2 FOL condition. An evaluation of the secondary water chemistry to maximize the turbine availability is currently accomplished under administrative controls (Procedure 1000.043) and it is proposed to continue to be controlled in this manner. Therefore, the proposed change to the ANO-2 TS will differ from NUREG-1432 based on using the currently approved wording contained in the FOL.

1.61 Administrative Controls Section New 6.5.2, Primary Coolant Sources Outside Containment

Discussion of Changes

The Primary Coolant Sources Outside Containment will be deleted as an FOL condition and added as a PTS 6.5.2. Minor wording changes are proposed to the FOL condition when it is added as PTS 6.5.2. In addition, the FOL requires that the integrated leak test for each system be performed at a frequency not to exceed refueling cycle intervals. These words will be changed to at least once per 18 months. Finally, the PTS adds the applicability of Surveillance Requirement 4.0.2.

Administrative Changes



- A1 The designated change represents a non-technical non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes; and hietarchy structure.
- A3 The Primary Coolant Sources Outside Containment license condition will be moved to an equivalent programmatic requirement in PTS Section 6.5 Programs and Manuals. The requirements of this license condition will be retained in Section 6.5. The PTS programmatic administrative controls specifications are consistent with NUREG-1432 and current plant practice, and meet the intent of the existing license condition. As such, this change in presentation of existing requirements is purely administrative.
- A24 FOL 2.C.(5) requires performance of integrated leak tests for each system outside containment that could contain highly radioactive fluids "at a frequency not to exceed refueling cycle intervals." PTS 6.5.2 results in a change of the frequency to "at least once per 18 months." Since normal refueling cycle intervals" are defined as 18 months, presenting this requirement in this manner is consistent with the current requirement.
- A25 PTS 6.5.2 is considered a surveillance requirement (SR) and thus the normal surveillance intervals that are specified in the Limiting Condition for Operation (LCO) section that allow a 25% extension of the frequency in accordance with SR 4.0.2 are applicable to PTS 6.5.2 Because SR 4.0.2 applies to the LCO section of procedures, it is necessary to reference its applicability to PTS 6.5.2. This change is described in Technical Specification Task Force (TSTF)-299.

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1.61 Administrative Controls Section New 6.5.2, Primary Coolant Sources Outside Containment (continued)

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

ANO-1 ITS Comparison

The proposed change is consistent with the ANO-

NUREG-1432 Comparison

NUREG-1432, section 5.5.2 includes a listing of systems that are considered primary coolant sources outside containment. This list is not incorporated. The application is adequately controlled through the design modification process and application of 10 CFR 50.59, *"Changes, Tests, and Experiments."* Therefore, the list of systems to which the program is applied will not be included in the proposed change and it is proposed to continue to administratively control the systems to which the specification is applicable.



1.62 Administrative Controls Section New 6.5.9, Steam Generator (SG) Tube Surveillance Program

Discussion of Changes

The proposed change relocates SR 4.4.5.0. 4.4.5.1, 4.4.5.2, 4.4.5.3, 4.4.5.4, Table 4.4-1, and Table 4.4-2 to PTS 6.5.9. Only minor editorial changes are proposed.

Administrative Changes

A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not after the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes, and hierarchy structure.

Technical Changes – More Restrictive

None

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

ANO-1 JTS Comparison

Discussion of Differences

ANO-1 has relocated the SG tube surveillance program to specification 5.5.9. Due to the two units being different, the current licensing basis varies slightly. ANO-2 is relocating the current licensing basis with only the minor changes.

NUREG-1432 Comparison

NUREG-1432 specification 5.5.9 contains a reviewer's note specifying that the current licensing basis for the SG tube surveillance program should be relocated to this specification. ANO-2 is relocating the current licensing basis with only the minor changes. This change is consistent with the NUREG.

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1.63 Administrative Controls Section New 6.5.13, Diesel Fuel Oil Testing Program

Discussion of Changes

CTS SR 4.8.1.1.2.b will be reworded to require verification of fuel oil properties in accordance with the Diesel Fuel Oil Testing Program (PTS 6.5.13). The new program will include testing of new fuel oil. Immediate confirmation of fuel oil quality (by monitoring for specific gravity, viscosity, and appearance/color) as well as follow up confirmatory testing within 31 days after adding new fuel oil to the bulk storage tank will provide added assurance of acceptable fuel oil. This broad spectrum testing will not be performed routinely since this initial verification provides the necessary confirmation of fuel oil quality.

CTS SR 4.8.1.1.2.b will be revised to require the periodic (esting of the stored fuel oil only for particulates (replacing the periodic testing per ASTM-D975) once every 92 days per PTS 6.5.13. These changes reflect the standard industry diesel fuel oil testing programs. Over the storage life of the ANO-2 fuel oil, the properties tested by ASTM-D975 are not expected to change and performing these tests once on the new fuel oil provides adequate assurance of the proper quality fuel oil. The periodic testing for particulates monitors a parameter that reflects degradation of fuel oil and can be trended to provide increased confidence that the stored diesel fuel oil will support diesel generator operability. The 92 day frequency is the current licensing basis and will be retained.

PTS 6.5.13 will allow the application of SR 4.0.2 and 4.0.3 which is consistent with the current SR testing frequencies.

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1.63 Administrative Controls Section New 6.5.13, Diesel Fuel Oil Testing Program (continued)

Administrative Changes

A2 A statement regarding the Applicability of SR 4.0.2 and /or SR 4.0.3 is added for clarification that the allowances provided by these general Surveillance Requirements are applicable to the identified program. This is an administrative change since the CTS 4.0.2 and 4.0.3 are currently applicable to the requirements being moved to the program that will be identified in the Administrative Controls section 6.0. This change is applicable to CTS 4.8.1.1.2.b which will be incorporated into the Diesel Fuel Oil testing Program, PTS 6.5.13. The change is also applicable to CTS 4.7.6.1.2 and 4.9.11.2 which will be incorporated into the Ventilation Filtration Program, PTS 6.5.11.

Technical Changes – More Restrictive

M1 CTS 4.8.1.1.2.b will be revised to include testing of new fuel oil. Immediate confirmation of fuel oil quality by monitoring for specific gravity, viscosity, and appearance, as well as follow-up confirmatory testing within 31 days after adding new fuel oil to the bulk storage tank will provide added assurance of acceptable fuel oil. This board spectrum testing will not be routinely performed (refer to DØC L1) since this initial verification provides the necessary confirmation of fuel oil quality. This is an additional restriction on the unit.

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

LA1 CTS 4 8.1.1.2.b - This information will be moved to a licensee controlled document such as the Diesel Fuel Oil Testing Program (DFOTP), or the Ventilation Filter Testing Program (VFTP). A description of the programs will be incorporated into the Administrative Controls section 6.0. This information provides details of the method of implementation which are not directly pertinent to actual requirements. Since these details are not necessary to adequately describe the actual regulatory requirement, they can be moved to a licensee controlled document without a significant impact on safety. Placing these details in controlled documents provides adequate assurance that they will be maintained. The details of the DFOTP and VFTP will be controlled by 10CFR 50.59. Attachment 1 to 2CAN0103XX Page 97 of 100

1.63 Administrative Controls Section New 6.5.13, Diesel Fuel Oil Testing Program (continued)

Discussion of Differences

ANO-1 Comparison

The new Diesel Fuel Oil testing Program for ANO-2 is consistent with the ANO-1 ITS 5.5.13 except the allowance of using the current ANO-2 testing frequency for particulates o every 92 days.

NUREG-1432 Comparison

NUREG-1432 and PTS 6.5.13 differ slightly. NUREG-1432 requires that the new fuel oil have a clear and bright appearance with proper color while the proposed TS requires the water and sediment to be within limits. ANO fuel oil is supplied with added dye, which precludes appropriate "clear and bright" testing.

1.64 Administrative Controls Section New 6.5.11 Ventilation Filter Testing Program

Discussion of Changes

The Control Room Emergency Air Filtration System surveillance requirements 4.7.6.1.2.b, c., d.1, e., and f. and the Fuel Handling Area Ventilation System surveillance requirement 4.9.11.2 will be combined into the new Ventilation Filter Testing Program (PTS 6.5.11). The proposed change will result in a new SR 4.7.6.1.2.c and SR 4.9.11.2 to direct filter testing in accordance with the Ventilation Filter Testing Program (VFTP).

The testing frequencies currently included will be deleted and replaced by a reference to perform testing at the frequencies specified in Regulatory Guide 152 Revision 2. There is no actual change in frequency.

The frequency "within 31 days after removal" and the reference to Regulatory Position C.6.b of Regulatory Guide 1.52 contained in CTS 4.9.11.2.a.2 will be deleted.

The phrase "other filters in the system" will be added to current SR 4.7.6.1.2.d.1 and 4.9.11.2.c when it is relocated.

Administrative Changes

- A1 The designated change represents a non-technical, non-intent change to the Arkansas Nuclear One, Unit 2 CTS made to make the ANO-2 Proposed Technical Specifications (PTS) consistent with the ANO-1 TSs or the CE Standard Technical Specification (RSTS), NUREG 1432, Revision 2. This change does not alter the requirements of the CTS or RSTS. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.
- A2 A statement regarding the Applicability of SR 4.0.2 and /or SR 4.0.3 is added for clarification that the allowances provided by these general Surveillance Requirements are applicable to the identified program. This is an administrative change since the CTS 4.0.2 and 4.0.3 are currently applicable to the requirements being moved to the program that will be identified in the Administrative Controls section 6.0. The change is also applicable to CTS 4.7.6.1.2 and 4.9.11.2 which will be incorporated into the Ventilation FilterTesting Program, PTS 6.5.11.
- A4 CTS SR 47.6.1.2.b & 4.9.11.2.a will be replaced by PTS 6.5.11, Ventilation Filter Testing Program. The presentation of the requirements for ventilation filter testing is revised for consistency. All frequencies and methods are replaced by a reference to perform the testing at the frequencies specified in Regulatory Guide 1.52, Revision 2. Since there are no actual changes in the frequencies, this change is considered to be one of presentation only, and there, administrative in nature.

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1.64 Administrative Controls Section New 6.5.11 Ventilation Filter Testing Program (continued)

Technical Changes – More Restrictive

- M2 By deleting the specific Regulatory Guide (RG) 1.52 section references from CTS 4.7.6.1.2.b and 4.9.11.2.a, the associated PTS section 6.5.11 will ensure all applicable RG 1.52 filter testing frequencies and criteria are applied to the TS ventilation filter systems. This results in a more restrictive change to unit operation, although RG 1.52 testing not specifically detailed in the CTS has previously been incorporated within the ANO filter testing program. RG 1.52 criteria not contained within the CTS includes the air flow distribution test (when maintenance activities may have affected the air flow distribution) for the Control Room Emergency Ventilation System, and the charcoal absorber leak test following charcoal sampling activities (when the effectiveness of the charcoal absorber may have been affected) for all TS ventilation systems. These tests are currently performed, as applicable, under the filter testing program at ANO.
- M11 CTS 4.7.6.1.2.d.1 and 4.9.11.2.c will be changed to include prefilters and "roughing" filters in the ventilation system differential pressing testing requirement. The revision is shown as "other filters in the system" to accommodate system specific nomenclature and system design variances. These filters are part of the system and obviously do contribute to the system pressure drop and carability of the system to perform its function. Therefore, inclusion of the prefilters in this testing is appropriate. This change is an additional restriction on unit operation.

Technical Changes – Less Restrictive

None

Technical Changes - Removal of Details

LA1 This information will be moved to the Ventilation Filter Testing Program (VFTP). A description of the programs will be incorporated into the Administrative Controls section 6.0. This information provides details of the method of implementation which are not directly pertinent to actual requirements. Since these details are not necessary to adequately describe the actual regulatory requirement, they can be moved to a licensee controlled document without a significant impact on safety. Placing these details in controlled documents provides adequate assurance that they will be maintained. The details of the VFTP will be controlled by 10CFR 50.59.

Discussion of Differences

ANO-1 Comparison

The ANO-2 proposed VFTP is similar to the ANO-1 approved program. The ANO-1 program includes the Penetration Room Ventilation System which was in the ANO-1 TSs prior to ITS conversion. The ANO-2 Penetration Room Ventilation system is not included as a Technical Specification system in the current licensing basis. The relocation of these SRs reflects the intent of the ANO-1 ITS VFTP.

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1.64 Administrative Controls Section New 6.5.11 Ventilation Filter Testing Program (continued)

NUREG-1432 Comparison

The relocation of the filter testing surveillance requirements from the control room ventilation and air conditioning specification and from the fuel handling area ventilation specification is consistent with the philosophy set forth in NUREG-1432. The NUREG does not specifically define the systems or testing acceptance criteria, as these are plant specific. The relocation of these SRs reflects the intent of the NUREG.



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(i) <u>Containment Radiation Monitor</u>

AP&L shall, prior to July 31, 1980 submit for Commission review and approval documentation which establishes the adequacy of the qualifications of the containment radiation monitors located inside the containment and shall complete the installation and testing of these instruments to demonstrate that they meet the operability requirements of Technical Specification No. 3.3.3.6.

- 2.C.(3)(j) Deleted per Amendment 7, 12/1/78.
- 2.C.(3)(k) Deleted per Amendment 12, 6/12/79 and Amendment No. 31, 5/12/82.
- 2.C.(3)(I) Deleted per Amendment 24, 6/19/81.
- 2.C.(3)(m) Deleted per Amendment 12, 6/12/79.
- 2.C.(3)(n) Deleted per Amendment 7, 12/1/78
- 2.C.(3)(o) Deleted per Amendment 7, 12/1/78
- 2.C.(3)(p) Deleted er Amendm

COI-shall import a secondary water chemistry ring producting the overall plant ative productor "Steam Constant Water Chemic Monitoria wit II", to minimize steam generality be degradation. The program shall be defined in weific plant procedures and shall include:

-------Identificat of eampling-schedule for the critical providence and control-points for these paragram is;

Values of the critical parameters;

A3

- 3-----Identification of process sampling points;
- 4.----Procedure for the recording and management of data;
- 5. Procedures defining corrective actions for off control point chemistry conditions; and
- A procedure identifying the authority responsible for the interpretation of the data, and the sequence and timing of administrative events required to initiate corrective action.
 - 7 Amendment No.

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2.C.(4) (Number has never been used.)

2.C.(5) Deleted per AmendmentEOI-shall-implement a program to reduce leakage from systems outside containment that would or could contain highly radicactive fluids during a serious transient or accident to as low as practical levels. This program shall-include the following.

Provisions establishing preventative maintenance and periodic visual inspection requirements, and

Α1

2......Integrated leak test-requirements for the exceed refueling-cycle intervale

2.C.(6) Deleted per AmendmentEOI shall implement gram with ill ensure the capability to accurately determine the airborn areas under accident conditions. This program include the line include t

- 2......Procedures for monitoring, and 3......Provisions for monitoring and equipment.
- 2.C.(7) Deleted per Amendment 78, 22/86.
- (8) Antitrust Conditions

EOI shall not market or broker power or energy from Arkansas Nuclear One, Unit 2. Entergy Arkansas, Inc. is responsible and accountable for the actions of its agents to the extent said agent's actions affect the marketing or brokering of power or energy from ANO, Unit 2.

Rod Average Fuel Burnup

Entergy Operations is authorized to operate the facility with an individual rod average fuel burnup (burnup averaged over the length of a fuel rod) not to exceed 60 megawatt-days/kilogram of uranium.

D. Physical Protection

(9)

EOI shall fully implement and maintain in effect all provisions of the Commissionapproved physical security, guard training and qualification, and safeguards contingency plans, including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plan, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Arkansas Nuclear One Industrial Security Plan," with revisions submitted through August 4, 1995. The Industrial Security Plan also includes the requirements for guard training and qualification in Appendix A of the safeguards contingency events in Chapter 7. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.



Amendment No. 111,128,144,161,172,177, A3

A5

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ARKANSAS – UNIT 2

XVII

Amendment No. 21,60,91,94,157,176, 193,

DEFINITIONS

EXCLUSION AREA

1.31 The EXCLUSION AREA is that area surrounding ANO within a minimum radius of .65 miles of the reactor buildings and controlled to the extent necessary by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials.

UNRESTRICTED AREA

1.32 An UNRESTRICTED AREA shall be any area at or beyond the exclusion area boundary.

CORE OPERATING LIMITS REPORT

1.33 The CORE OPERATING LIMITS REPORT is the ANO-2 specific document that provides core operating limits for the current operating reload cycle. These cycle-specific core operating limits shall be determined for each reload cycle in accordance with Technical Specification <u>6.6.56.9.5</u>. Plant operation within these operating limits is addressed in individual specifications

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TABLE 3.3-6

RADIATION MONITORING INSTRUMENTATION



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TABLE 3.3-6 (Continued)

TABLE NOTATION

- ACTION 13 With the number of channels OPERABLE less than required by the Minimum Channels OPERABLE requirement, perform area surveys of the monitored area with portable monitoring instrumentation at least once per 24 hours.
- ACTION 16 With the number of OPERABLE channels one less than the Minimum Channels OPERABLE requirement, complete the following:
 - a. If performing CORE ALTERATIONS or moving irradiated fuel within the reactor building, secure the containment purge system or suspend CORE ALTERATIONS and movement of irradiated fuel within the reactor building.
 - b. If a containment PURGE is in progress, secure the containment purge system.
 - If continuously ventilating, verify the SPING monitor operable or perform the ACTIONS of 3.3.3.9, or secure the containment purge system

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- ACTION 17 In MODE 1, 2, 3, or 4 Wwith no channels OPERABLE, within 1 hour initiate and maintain operation of the control room emergency ventilation system (CREVS) in A1 the recirculation mode of operation or be hours and COLD SHUTDOWN in the forwing 30 MA
- ACTION 18 With the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement (1) either restore the inoperable channel to OPERABLE status within 7 days or (2) prepare and submit a Special Report to the <u>ARC Comp</u> ion put ant to Specification 0.0.2 within 30 days following the event, outlining the action taken, the cause of the inoperability, and the plans and schedule for restoring the system to OPERABLE status. With both channels inoperable, initiate alternate methods of monitoring the containment radiation level within 72 hours in addition to the actions described above.

ACTION 19 - With the number of OPERABLE Channels less than required by the Minimum Channels OPERABLE requirements, initiate the preplanned alternate method of monitoring the appropriate parameter(s), within 72 hours, and:

either restore the inoperable Channel(s) to OPERABLE status within 7 days of the event, or

- 2) prepare and submit a Special Report to the Commission NRC pursuant to 50.6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- ACTION 20 In MODE 1, 2, 3, or 4 Wwith the number of channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement, restore the inoperable channel to OPERABLE status within 7 days, or within the next 6 hours initiate and maintain the control room emergency ventilation system in the recirculation mode of operation within 7 days, or be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN in the following 30 hours.
- ACTION 21 During handling of irradiated fuel with one or two channels inoperable, immediately place one OPERABLE CREVS train in the emergency recirculation mode or immediately suspend handling of irradiated fuel.

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TABLE 4.3-3

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS


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TABLE 3.3-10

POST-ACCIDENT MONITORING INSTRUMENTATION



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TABLE 3.3-10 (Con't) POST-ACCIDENT MONITORING INSTRUMENTATION

A1

		MINIMUM CHANNELS		
INS	TRUMENT	<u>OPERABLE</u>	<u>ACTION</u>	
13.	In Core Thermocouples (Core-Exit Thermocouples)	2/core quadrant	1	
14.	Reactor Vessel Level Monitoring System (RVLMS)	2	3, 4	

- Action 1: With the number of OPERABLE post-accident monitoring channels less than required by Table 3.3-10, either restore the inoperable channel to OPERABLE status within 30 days, or be in HOT SHUTDOWN within the next 12 hours
- Action 2: With the number of OPERABLE post-accident monitoring channels less than required by Table 3.3-10, either restore the inoperable channel to OPERABLE status within 30 days, or be in HOT SHUTDOWN within the next 12 hours.

If only one channel is inoperable and containment entry is required to restore the inoperable channel, the channel need not be restored until the following refueling outage.

- Action 3: With the number of OPERABLE channels one less than the minimum number of channels required to be OPERABLE:
 - a. If repairs are feasible, restore the inoperable channel to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours.
 - b. If repair is not feasible without shutting down, operations may continue and a special report part to specification 6.9.2 shall be submitted to the NRC A6 within 30 days following the failure; describing the action taken, the cause of the inoperability, and the plans and schedule for restoring the channel to OPERABLE status during the next scheduled refueling outage.
- Action With the number of OPERABLE channels two less than the minimum channels required to be OPERABLE:

If repairs are reasible, restore at least one inoperable channel to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours

b. If repair is not feasible without shutting down, operation may continue and a special report pursuant to specification 6.9.2 shall be submitted to the NRC A6 within 30 days following the failure; describing the action taken, the cause of the inoperability, and the plans and schedule for restoring the channels to OPERABLE status during the next scheduled refueling outage.

Attachment 2 to 2CAN0103XX Page 11 of 78 REACTOR COOLANT SYSTEM

STEAM GENERATORS

LIMITING CONDITION FOR OPERATION

3.4.5 Each steam generator shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one or more steam generators inoperable, restore the inoperable generator(s) to OPERABLE status prior to increasing Tavg above 200°F.

SURVEILLANCE REQUIREMENTS

4.4.5.04.4.5 Each steam generator shall be demonstrated OPERABLE in accordance with the Steam Generator Tube Surveillance Program. by performance of sellowing augmented inservice inspection program.

- NOTE: The requirements for inservice inspection not apply hing the stewn generator replacement-outage (2R14).
- 4.4.5.1 <u>Steam Generator Sample Selection and Inspection</u> Each Steam generator shall be determined OPERABLE during to indown by setting a finspecting at least the minimum number of steam generator specific in Table 4.4-1.
- 4.4.5.2 <u>Steam Generator Tube Same election and Inspection</u> The steam generator tube minimum inspect sult classification, and the corresponding action require tubes shall formed formed formed in specified in specification 4.4.5.3 e inspected tubes be venil, acceptable per the acceptance criteria of confication 4.4.5.4. The inservice inspection shall include at tubes in all steam generators; the tubes selected for inspections shall be cited on a random basis except:
 - Why environce in all and plants with similar water chemistry indicates critical areas inspected than at least 50% of the tubes inspected chall be from these ch.
 - b. The first sample of tubes colected for each inservice inspection (subsequent to the preservice inspection) of each steam generator shall include:

SR 4.4.5.1 and 4.4.5.2 are relocated to PTS 6.5.9. See markup of inserts.

ARKANSAS – UNIT 2

3/4 4-6 Next Page is 3/4 4-13 Amendment No. 158, 187, 210, 217, 223,

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Attachment 2 to 2CAN0103XX Page 12 of 78 KEANTOR-GONTANT-SYSTEM

SUFVEILLANDE-REQUIREMENTS-(Continued)

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ARKANSAS - UNIT 2

3/4-4-7

Amendment No. 158, 187, 223

Attachment 2 to 2CAN0103XX Page 13 of 78 KEANTOR-GODIANT-SYSTEM

SUFVEILLANSE REQUIREMENTS (Cont.Longed)

4-4-5-3-Inspection Frequencies - The above required incorvice inspections ef-steam generator takes shall be performed at the fellowing frequencies.

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This page will be deleted and the requirements moved to PTS 6.5.9. See markup of inserts.

ARKANSAS - UNIT-2

Attachment 2 to 2CAN0103XX Page 14 of 78 KEANTOR-CONTAINT-OF STREET

SUPVEILLANCE REQUIREMENTS (Continued)

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	Low Socient accident, or a steam line or focowater line
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	2. Tube Inspection means an inspection of the steam generator

This page will be deleted and the requirements relocated to PTS 6.5.9. See markup of inserts.

ARKANSAS - UNIT 2

3/4-4-9

Amendment No. 133,142,184,223

Attachment 2 to 2CAN0103XX Page 15 of 78 <u>REACTOR COOLANT SYSTEM</u>

SURVEILLANCE REQUIREMENTS (Continued)



This page will be deleted.

ARKANSAS - UNIT-2

3/4-4-10

Amendment-No. 91,133,142,184,187,223

TABLE 4.4-1.



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STRAM GRASHAROR CLARE INSPECTION

		200 SPATEL	INSPECTION			SAMPLE INSPECTION		
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S	;¥;					<u>i</u>	L	
ARKANSAS – UNIT 2 3/4 4-12 Amendment No. 91. 133. This page will be deleted and the markup of inserts.					deleted and the cated to PTS 6.5.9. See			

Amendment No. 91, 133, 143, 158, 187, 223

Attachment 2 to 2CAN0103XX Page 18 of 78 EMERGENCY CORE COOLING SYSTEMS

ECCS SUBSYSTEMS - Tava ≥ 300°F

LIMITING CONDITION FOR OPERATION

- 3.5.2 Two independent ECCS subsystems shall be OPERABLE with each sub-system comprised of:
 - a. One OPERABLE high-pressure safety injection pump,
 - b. One OPERABLE low-pressure safety injection pump and
 - c. An independent OPERABLE flow path capable of taking suction from the refueling water tank on a Safety Injection Actuation Signal and automatically transferring suction to the containment sump on a Recirculation Actuation Signal.

APPLICABILITY: MODES 1, 2 and 3*.

ACTION:

- a. With one ECCS subsystem inoperable, restore the noperable subsystem to OPERABLE status within 72 hours or be in HOT SHUTDOWN within the next 12 hours.
- b. In the event the ECCS is actuated and mects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 to the NRC within 90 days describing the circumstances of the A6 actuation and the total accumulated actuation cycles to date.

SURVEILLANCE REQUIREMENTS

4.5.2 Each ECCS subsystem shall be demonstrated OPERABLE:

At least once per 12 hours by verifying that the following valves are in the indicated positions with power to the valve operators removed:

Valve Number	Valve Function	Valve Position
2CV-5101	HPSI Hot Leg Injection Isolation	Closed
2CV-5102	HPSI Hot Leg Injection Isolation	Closed
2BS26	RWT Return Line	Open

*With pressurizer pressure ≥ 1700 psia.

Amendment No.

Attachment 2 to 2CAN0103XX Page 19 of 78 EMERGENCY CORE COOLING SYSTEMS

ECCS SUBSYSTEMS - Tava ≤300°F

LIMITING CONDITION FOR OPERATION

- 3.5.3 As a minimum, one ECCS subsystem comprised of the following shall be OPERABLE:
 - a. One OPERABLE high-pressure safety injection pump, and
 - b. An OPERABLE flow path capable of taking suction from the refueling water tank on a Safety Injection Actuation Signal and automatically transferring suction to the containment sump on a Recirculation Actuation Signal.

APPLICABILITY: MODES 3* and 4.

ACTION:



- a. With no ECCS subsystem OPERABLE, restore at least one ECCS subsystem to OPERABLE status within 1 hour or be in COLD-SHUTDOWN within the next 20 hours.
- b. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted <u>Commission pursuant to</u> Specification 6.9.2 to the NRC within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date.

SURVEILLANCE REQUIREMENTS

4.5.3 The ECCS subsystem shall be demonstrated OPERABLE per the applicable Surveillance Requirements of 4.5.2.

*With pressurizer pressure < 1700 psia.

Amendment No.

Attachment 2 to 2CAN0103XX Page 20 of 78 CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- 4.6.3.1.2 Each containment isolation valve shall be demonstrated OPERABLE at least once per 18 months by verifying that on a containment isolation test signal, each isolation valve actuates to its isolation position.
- 4.6.3.1.3 The isolation time of each power operated or automatic containment isolation valve shall be determined to be within its limit when tested pursuant to the Inservice Testing Program.
- 4.6.3.1.4 The containment purge supply and exhaust isof on value valid be demonstrated OPERABLE as specified in the Containment A kage BA sting Program.

Prior to exceeding conditions which require the first of the first of

SR 4.6.3.1.4 is being moved to PTS 6.5.16. See PTS 6.5.16 for markup of changes.

Amendment No. 46,149,154,214,233

3/4.7.6 CONTROL ROOM EMERGENCY VENTILATION AND AIR CONDITIONING SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.6.1 Two independent control room emergency ventilation and air conditioning systems shall be OPERABLE. (Note 1)

APPLICABILITY: MODES 1, 2, 3, 4, or during handling of irradiated fuel.

ACTION:

MODES 1, 2, 3, and 4

- a. With one control room emergency air conditioning system inoperable, restore the inoperable system to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With one control room emergency ventilation system inoperable, restore the inoperable system to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- c. With one control room emergency air conditioning system and one control room emergency ventilation system inoperable, restore the inoperable control room emergency ventilation system to OPERABLE status within 7 days and restore the inoperable control room emergency air conditioning system to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours
- d. With two ontrol rooms gency within systems inoperable due to an inoperable copy from boundary. In the the cont from boundary to OPERABLE status within 24 is or be in at least HOV ANDBY within the next 6 hours and in COLD SHUTDOWN in the following 30 hours

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During Handling of Irradiated Fuel

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With one control room emergency air conditioning system inoperable, restore the inoperable system to OPERABLE status within 30 days or immediately place the OPERABLE system in operation; otherwise, suspend all activities involving the handling of irradiated fuel. The provisions of Specification 3.0.4 are not applicable.



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With one control room emergency ventilation system inoperable, restore the inoperable | system to OPERABLE status within 7 days or immediately place the control room in the emergency recirc mode of operation; otherwise, suspend all activities involving the handling of irradiated fuel. The provisions of Specification 3.0.4 are not applicable.

Note 1: The control room boundary may be opened intermittently under administrative controls.

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Attachment 2 to 2CAN0103XX Page 23 of 78 PLANT SYSTEMS

CONTROL ROOM EMERGENCY VENTILATION AND AIR CONDITIONING SYSTEM

LIMITING CONDITION FOR OPERATION (Continued)

- h. With one control room emergency air conditioning system and one control room emergency ventilation system inoperable.
 - restore the inoperable control room emergency ventilation system to OPERABLE
 status within 7 days or immediately place the control room in the emergency recirc
 mode of operation, and

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- 2. restore the inoperable control room emergency a conductive system to <u>OPERABLE status within 30 days or Immediat</u> place the <u>DERABLE system in</u> <u>operation</u>;
- 3. otherwise, suspend all activities involving the handling of irradiated when
- 4. The provisions of Specification 3.0.4 are not applicable
- i. With both control room emergency air conditions when sor both control room emergency ventilation systems inoperable control suspend ally divities involving the handling of irradiated fuel.

Attachment 2 to 2CAN0103XX Page 24 of 78 PLANT SYSTEMS

See insert markup of

4.7.6.1.2.b

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and c.

SURVEILLANCE REQUIREMENTS (Continued)

- 4.7.6.1.1 Each control room emergency air conditioning system shall be demonstrated **OPERABLE**:
 - 8. At least once per 31 days on a STAGGERED TEST BASIS by:
 - 1. Starting each unit from the control room, and
 - 2. Verifying that each unit operates for at least 1 hour and maintains the control room air temperature \leq 84°F D.B.

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- b. At least once per 18 months by verifying a system flow rate of 9900 cfm ± 10%.
- 4.7.6.1.2 Each control room emergency air filtration system shall be demonstrated **OPERABLE**:
 - At least once per 31 days on a STAGGERED TEST BASIS by initiating. LA2 а. from the control room, flow through the MEPA in re-and changed adsorbers and verifying that the system operates for at least 15 minutes.
- At least once per 18 months or (1) at any structure at a gence on the HEPA filter or charcoal adsorber housings. (2) foiled by pain (2) or chemical release in any ventilation zone communication with the statem by: 1. Verifying that the cloup system of files the in place testing acceptance oritoria and uses the fost procedure of Regulary Positions C.5.a, C.5.c and C.5.d of F bry Guide 1.52 2, March 1978, and the system flow rate 00 cfm ± 10%.
 - Willying within 31 and after removal that a laboratory analysis of a en interversion in the obtained in accordance with Regulatory Position Of Regulation Guide 1.52, Revision 2, March 1978, meets the Inberotory 1, the criteria of M. D3803-1989 when tested at 30°C and 95% relative will dily for a methyl lodide penetration of:

 - b.....

Verifying a system flow rate of 2000 cfm ± 10% during system operation when tested in cordance with ANSI N510-1975.

Werery 720 how charcoal adsorber operation by verifying within 31 days wevel that the provide the second sec aite Regulatory Position C.6 b of Regulatory Guide 1.52. Revision 2. March 2018 the laboratory testing criteria of ASTM D3803-1969 when tested at 38 and -95% relative humidity for a methyl locide penetration of: < 2.6% for 2 inch-charcoal-adsorber-beds, or

2 -S-0.5% for 4-inch-charcoal-adsorber-beds.

A1 d2b At least once per 18 months by verifying that on a control room high radiation test signal either actual or simulated, the system automatically L11 isolates the control room within 40 seconds and switches into a recirculation LA2 mode of operation with flow through the HEPA filters and charcoal adsorber banka.

By performing the required Control Room Emergency Ventilation filter C, testing in accordance with the Ventilation Filter Testing Program (VFTP).



3/4 7-18 Next Page is 3/4 7-22 Amendment No. 191,206,219,

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Attachment 2 to 2CAN0103XX Page 25 of 78 PLANT SYSTEMS

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moved to

4.7.6.1.2.b

SURVEILLANCE REQUIREMENTS (continued)

d. Alleast once per 18 months by:

4.......Verifying that the pressure drop across the combined HEPA filters and charceal adsorber banks is < 6 inches Water Gauge while operating the system at a flow rate of 2000 cfm ± 10%.

2..... Verifying that on a control room high radiation test signal, the system LA5 automatically isolates the control room within 1 contra and switches No HEPA filles into a recirculation mode of operation with flow and charcoal adsorber banks.

proposed TS After each complete or partial replacement of Siler bai leniving 6.5.11, with that the HEPA filter banks remove > 99.95% of W OP-when th in-place in accordance with ANSI-N510-1975 w ating the sve flow-rate-of-2000-cfm-±-10%noted. See

> After each complete or partial replaceo iller bank by verifying that the charcoal adsorbor move hydrocarbon refrigerant test gas which they are to \$\$%-of a half enated in place in accordance with ANSI-N510-1975 while oper ing the offen l wrate of 2000 cfm ±40%.

At least once per 18 months verify the system makeup flow rate is \geq 300 and d <u>< 366 cfm when supplying the control room with outside air.</u>

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SURVEILLANCE REQUIREMENTS (Continued)

If any snubber selected for functional testing either fails to activate or fails to move, i.e., frozen-in-place, the cause will be evaluated and, if caused by manufacturer or design deficiency, all snubbers of the same type subject to the same defect shall be evaluated in a manner to ensure their OPERABILITY. This requirement shall be independent of the requirements stated in Specification 4.7.8.d for snubbers not meeting the functional test acceptance criteria.

g. <u>Preservice Testing of Repaired, Replacement and New Snubbers</u>

Preservice operability testing shall be performed on repaired, replacement or new snubbers prior to installation. Testing may be at the manufacturer's facility. The testing shall verify the functional test acceptance oriteria in 4.7.8 e

In addition, a preservice inspection shall be performed on each repaired replacement or new snubber and shall verify that:

- 1) There are no visible signs of damage or impaired operability as a result of storage, handling or installation;
- The snubber load rating, location, orientation, position setting and configuration (attachment, extensions, etc.), are in accordance with design;
- 3) Adequate swing clearance is provided to allow snubber movement;

4) If applicable, fluid is at the recommended level and fluid is not leaking from the snubber system

Structural connections such as pins, bearings, studs, fasteners and other connecting hardware such as lock nuts, tabs, wire, and cotter pins are installed correctly.

Snubber Seal Replacement Program

The seal service life of hydraulic snubbers shall be monitored to ensure that the service life is not exceeded between surveillance inspections. The expected service life for the various seals, seal materials, and applications shall be determined and established based on engineering information and the seals shall be replaced so that the expected service life will not be exceeded during a period when the snubber is required to be OPERABLE. The seal replacement shall be documented and the documentation shall be retained in accordance with Specification 6.10.2.

Amendment No. 62,

3/4.7.12 SPENT FUEL POOL STRUCTURAL INTEGRITY

LIMITING CONDITION FOR OPERATION

3.7.12 The structural integrity of the spent fuel pool shall be maintained in accordance with Specification 4.7.12.

<u>APPLICABILITY</u>: Whenever irradiated fuel assemblies are in the spent fuel pool.

ACTION:

- a. With the structural integrity of the spent fuel pool not conforming to the above requirements, in lieu of any other report, prepare and submit a Special Report to the A6 Commission pursuant to Specification 6.9.2 to the N within 30 days of a determination of such non-conformity.
- b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

- 4.7.12.1 <u>Inspection Frequencies</u> The structural integrity of the spent fuel pool shall be determined per the acceptance ofteria of Specification 4.7.12.2 at the following frequencies:
 - a. At least once per 92 days after the pool is filled with water. If no abnormal degradation or other indications of structural distress are detected during five consecutive inspections, the inspection interval may be extended to at least once per 5 years.

Within 24 hours following any seismic event which actuates or should have actuated the seismic monitoring instrumentation.

4.7.12 2 Acceptance Criteria - The structural integrity of the spent fuel pool shall be determined by a visual inspection of at least the interior and exterior surfaces of the pool, the structs in the tilt pit, the surfaces of the separation walls, and the structural slabs adjoining the pool walls. This visual inspection shall verify no changes in the concrete crack patterns, no abnormal degradation or other signs of structural distress (i.e., cracks, bulges, out of plumbness, leakage, discolorations, efflorescence, etc.).

Attachment 2 to 2CAN0103XX Page 28 of 78 3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

LIMITING CONDITION FOR OPERATION

- 3.8.1.1 As a minimum, the following A.C. electrical power sources shall be OPERABLE:
 - a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system and
 - b. Two separate and independent diesel generators each with:
 - 1. A day fuel tank containing a minimum volume of 280 gallons of fuel (equivalent to 50% of indicated tank volume),
 - A separate fuel storage system containing a minimum volume of 22,500 gallons of fuel (equivalent to 100% of indicated tank level), and
 - 3. A separate fuel transfer pump.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With one offsite A.C. circuit of the above required A.C. electrical power sources inoperable, perform the following:
 - 1. Demonstrate the OPERABILITY of the remaining offsite A.C. circuit by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter, and

Restore the offsite A C. circuit to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Startup Transformer No. 2 may be removed from service for up to 30 days as part of a preplanned preventative maintenance schedule. The 30-day allowance may be applied not more than once in a 10-year period. The provisions of Specification 3 0.4 are not applicable to Startup Transformer No. 2 during the 30-day preventative maintenance period.

Moved action b and Note 1 to new page 3/4 8-1a.

Note: With one-dissest-ganerator of the above toguined A.C. etcoited.
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ARKANSAS – UNIT 2

Amendment No. 141,215,234,

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- the The remaining diagona generator has been demonstrated of the termination of termination
- 3-----Restore-the-diosol-generator-to-OPEMABLE-status-within-72 hewro-(fac-nous-l)-or-bo-ir-ou-laceu-NOT-EWADEF-within-therest-5-hewro-Rad-ir-COLD-EHUTDOWN-within-the-follewing-3(hewro-

Note-1------The-sequirement-for-dissel-jenerotor-(EDG)-rectoration-to OPEFABLE-status-may-be-extended-to-ten-days-if-the-Alternate-AG diccol-generator (A2CDG) is verified-evailable. found-unavailable-during-this-period, the 72-bou period-of-condition-b-2-is-ismadiated-y-apply bit AAGDG-er-the-EDG-is-riturned-to-operable-of-size-indeys-fiem-the-EDG-is-riturned-to-operable-of-size-indeys-fiem-the-ind-theol-generator-indeys-fiem-the-ind-theol-generator-indeys-fiem-the-ind-theol-generator-inall of size-indeys-fiem-the-ind-theol-generator-inall of size-inA1

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A.C. Sources

LIMITING CONDITION FOR OPERATION (Continued)

- b. With one diesel generator of the above required A.C. electrical power source inoperable, perform the following:
 - 1. <u>Demonstrate the OPERABILITY of both the offsite A.C. circuits by</u> <u>performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least</u> <u>once per 8 hours thereafter, and</u>
 - 2. Demonstrate the OPERABILITY of the remaining OPERABLE diesel generator by performing Surveillance Requirement 4.8.1:1:2:a:4 within 24 hours except when:
 - i. A common cause failure has been determined not to exist, or
 - ii. The remaining diesel generator is currently in operation, or iii. The remaining diesel generator has been demonstrated OPERABLE within the previous 24 hours, and

All

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- 3. Restore the diesel generator to OPERABLE status within 72 hours (See note 1) or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours
- Note 1 The requirement for diesel generator (EDG) restoration to OPERABLE status may be extended to ten days if the Alternate AC diesel generator (AACDG) is verified available. If the AACDG is found unavailable during this period, the 72 hour restoration period of condition b.3 is immediately applicable until either the AACDG or the EDG is returned to operable status (not to exceed ten days from the initial diesel generator inoperability). The 10-day allowance may be applied only once for each EDG.

ARKANSAS – UNIT 2

Amendment No.

Attachment 2 to 2CAN0103XX Page 31 of 78 ELECTRICAL POWER SYSTEMS

A.C. Sources

LIMITING CONDITION FOR OPERATION (Continued) ACTION (Continued)

- c. With one offsite A.C. circuit and one diesel generator of the above required A.C. electrical power sources inoperable, perform the following:
 - 1. Demonstrate the OPERABILITY of the remaining offsite A.C., circuit by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter; and,
 - 2. If the diesel generator became inoperable due to any cause other than preplanned preventive maintenance or testing, then
 - i. Demonstrate the OPERABILITY of the remaining OPERABLE diese generator by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours except when:
 - a. The remaining diesel generator is currently in operation, or
 - b. The remaining diesel generator has been demonstrated OPERABLE within the previous 8 hours and
 - 3. Restore at least one of the inoperable sources to OPERABLE status within 12 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours, and
 - Restore both offsite circuits and both diesel generators to OPERABLE status within 72 hours (see b. 3, Note 1) of the initiating event or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- d. With two offsite A.C. circuits of the above required A.C. electrical power sources inoperable, perform the following:
 - 1. Perform Surveillance Requirement 4.8.1.1.2.a.4 on the diesel generators within the next 8 hours except when:
 - i. The diesel generators are currently in operation, or
 - ii. The diesel generators have been demonstrated OPERABLE within the previous 8 hours, and
 - 2. Restore one of the inoperable offsite A.C. circuits to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours, and
 - 3. Restore both A.C. circuits within 72 hours of the initiating event or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

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Attachment 2 to 2CAN0103XX Page 33 of 78 ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

A.C. Sources

LIMITING CONDITION FOR OPERATION (Continued)

- e. With two diesel generators of the above required A.C. electrical power sources inoperable, perform the following:
 - 1. Demonstrate the OPERABILITY of the two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a with 1 hour and at least A1 once per 8 hours thereafter, and

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- 2. Restore one of the inoperable diesel generation in COPL KA status within 2 hours or be in a least HOT STANDS to the next ours and in COLD SHUTDOWN within the following 30 to and
- 3. Restore both diesel generators within 72 hours (see Note 1) of the initiating event or be in at least HOT STANDBY within the 30 hours.

A1 pew or stored fuel oil properties outside le limits and le the limits of action f.1 or the perform the following as appropriate: (1 = 2)

- If one or more fuel store tanks contained less the 22,500 gallons and greater than 17, 446 gallons and greater the fuel column to within limits within 48 hours.
- L5 } If the stored fuel oil to chiculates are not within limits for one or more diesel of the store fuel of the store fu
- M6 3. <u>If new fuel oil pice lies are here thin limits for one or more diesel generators.</u> restore stored fuel properties to within limits within 30 days.

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 If action f.1 is not m within the allowable outage time or is outside the clowable limits. or ction f.2 or f.3 is not met within the allowable outage of the clowable outage is not met within the allowable outage of the clowable outage of the clo

Note 2 Separate Action Mirry is allowed for each diesel generator.

SR 4.8.1.1.1 & 4.8.1.1.2 and associated notes will be moved to a new page 3/4 8-2b.

L4

4-8-1.1.1.4 Each of the above required independent circuits between the offsite transmission network and the onsite Class-1E-distribution system shall A1 be:

a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments, indicated power availability, and

b.......Demonstrated OPERABLE at least once per 18 months during chutdown by transferring (manually and automatically) unit power supply from the normal circuit to the alternate circuit.

ARKANSAS – UNIT 2

Amendment No. 141,237,

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4-8-1-1-2 Each diesel-generator shall be demonstrated OPERABLE. (Note-1)

At least once per 31 days on a STAGGERED TEST BASIS by:

4 Verifying the fuel level in the day fuel tank.

2. Ventying the fuel level in the fuel storage tank.

3. Verifying the fuel transfer pump can be started and transfers fuel from the storage system to the day tank.

4-----Ventying-the diesel starts from a star condition of accelerates to at least 900 rpm in ≤ 15 seconds. (Note 2)

5------Verifying the generator is synchronized, od to an intervent 2000 to 2850 Kw and operates for 2 60 minutes (Not

6. Verifying the diesel generator is aligned to prove landby power to the associated emergency busses.

b At least once per 92 days verifyin sample of diesel fuel from the fuel storage tank obtained is scordar with M-D270-65, is within the acceptable limits specified sale of ASTN 74 when checked for viscosity, water and sed for

Nove-1

All planned dieb. nerator by for the purposes of these surveil lances may be preceded. relube procedures.

Note-2

This diesel-general Last from a standby condition in 6-15-sec. shall be second ished at le conce every 184-days...All other diesel-generator starts this surveiling hay be in accordance with vendor recommendations.

Disconserver in loading may be accomplished in accordance with vendor reconserver.

Nota-4

Momentary transients outside this load band due to changing loads will not invalidate the test. Load ranges are allowed to preclude over loading the diesel generators.

All A1



Attachment 2 to 2CAN0103XX Page 36 of 78 ELECTRICAL POWER SYSTEMS

SHUTDOWN

LIMITING CONDITION FOR OPERATION

- 3.8.1.2 As a minimum, the following A.C. electrical power sources shall be OPERABLE:
 - a. One circuit between the offsite transmission network and the onsite Class 1E distribution system, and
 - b. One diesel generator with:
 - 1. A day fuel tank containing a minimum volume of 280 gallons of fuel (equivalent to 50% of total tank volume).
 - 2. A fuel storage system containing a minimum volume of 22,500 gaftons of fuel (equivalent to 100% of total tank volume), and
 - 3. A fuel transfer pump.

APPLICABILITY: MODES 5 and 6.

ACTION:

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- a. With less than the above minimum required A.C. electrical power sources OPERABLE, suspend all operations involving CORE ALTERATIONS of positive reactivity changes.
- b. With the volume of the fuel of the system outsil the limits of action b.1 or the new or stored fuel of the outsil the limits of the Diesel Fuel Oil Testing Program, A1
 - L4 22.500 galions and energiated fuel storage tank contains less than electric sociated fuel storage tank contains less tank electric sociated fuel storage tank electric sociated fuel st
 - 2. I the stored fuel of the particulates are not within limits for the required diesel erator, restored el oil total particulates to within limits within 7 days.
 - If he lot operties are not within limits for the one required diesel gener. Store stored fuel oil properties to within limits within 30 days.

4. If action b.1 is not met within the allowable outage time or is outside the allowable limits, or if action b.2 or b.3 is not met within the allowable outage time, then immediately declare the associated diesel generator inoperable and suspend all operations involving CORE ALTERATIONS or positive reactivity changes.

SURVEILLANCE REQUIREMENT

4.8.1.2 The above required A.C. electrical power sources shall be demonstrated OPERABLE by the performance of each of the Surveillance Requirements of 4.8.1.1.1 and 4.8.1.1.2 except for Requirement 4.8.1.1.2a.5.

ARKANSAS – UNIT 2

Amendment No. 149,

A1

Attachment 2 to 2CAN0103XX Page 37 of 78 REFUELING OPERATIONS

FUEL HANDLING AREA VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.9.11 The fuel handling area ventilation system shall be operating and discharging through the HEPA filters and charcoal adsorbers.

APPLICABILITY:

Whenever irradiated fuel is being moved in the storage pool and during crane operation with loads over the storage pool.

ACTION:

- a. With the fuel handling area ventilation system not operating, suspend all operations involving movement of fuel within the spent fuel pool or crane operation with loads over the spent fuel pool until the fuel handling area ventilation system is restored to operation.
- b. The provisions of Specifications 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.11.1 The fuel handling area ventilation system shall be determined to be in operation and discharging through the HEPA filters and charcoal adsorbers at least once per 12 hours.

4.9.11.2 The fuel handling area ventilation system shall be demonstrated OPERABLE at the following frequencies when irradiated fuel is in the storage pool by performing the required fuel handling file testing in accordance with the Ventilation Filter Testing or am (VFTP).

- -a. Isl once per 18 months or (1) after any structural maintenance on the HEPA filter of provide sorber housings, or (2) following painting, fire or chemical release in any Vanish of zone communicating with the system by:
 - Verifying that the ventilation system satisfies the inplace testing acceptance criteria and uses the lest procedures of Regulatory Positions C.5.a, C.5.c and C.5.d of Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rates 39,700 cfm ± 10%.

See markup of inserts for changes.

ARKANSAS – UNIT 2

3/4 9-12 Next Page is 3/4 9-14 Amendment No. 134,

A1

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REFUELING OPERATIONS

SURVEILLANCE-REQUIREMENT (Continued)

2......Verifying within 31 days after removal that laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, Revision 2, March 1878, shows the methyl iodide penetration less than 5.0% when tested in accordance with ASTM D3803-1989 at a temperature of 30°C an erelative humidity of 95%.

3. Verifying a system flow rate of 39,700 cf = 10% d in a stem operation when tested in accordance with \$1510.16.

At lease once per 48 months by Virigit The provide the providet the

d. After each complete tial replacent. HEPA filter bank by verifying that the HEPA filter bank in move > 99% of the DOP when they are tested inplacent. Hence with SI-N510-1975 while operating the system at a file operating the system at a

After each complete partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove > 69.65% of a halogenated hydrocarbon refrigers est gas when they are tested in-place in accordance with ANSI N510-1974 file operating the system at a flow rate of 39,700 cfm 10%.

See markup of inserts for changes.

ARKANSAS -- UNIT 2

Amendment No. 228,

Attachment 2 to 2CAN0103XX Page 39 of 78 ADMINISTRATIVE CONTROLS

6.1 **RESPONSIBILITY**

- 6.1.1 The ANO-2 pPlant mManager ANO Operations shall be responsible for overall unit operations and shall delegate in writing the succession to this responsibility during his absence.
- 6.1.2 An individual with an active Senior Reactor Operator (SRO) license shall be designated as responsible for the control room command function while the unit is in MODE 1, 2, 3, A1 or 4. With the unit not in MODE 1, 2, 3, or 4, an individual with an active SRO license or Reactor Operator license shall be designated as responsible for the control room command function.

6.2 ORGANIZATION

a.

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6.2.1 ONSITE AND OFFSITE AND ONSITE ORGANIZATIONS.

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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 the safety of the nuclear power strung. (A1)

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Lines of authority, responsibility, and communication shall be <u>refined and</u> established and defined for the<u>th</u> undhout highest management levels, through intermediate levels, to and incide g-all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements including the unit specific titles of those personnel fulfilling its the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the Safety Analysis Report (SAR).

The ANO-2-plant mManager Operations shall be responsible for overall unit safe operation of the unit and shall have control over those onsite activities necessary for safe operation and maintenance of the plantunit;-

A specified corporate executive shall have corporate responsibility for overall <u>ant-unit</u> nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the <u>plant-unit</u> to ensure nuclear safety. The specified corporate executive shall be documented in the SAR<u>i-and</u>

6.2.2 will be moved to page 6-2 of the clean pages.

The individuals who train the operating staff, and those who carry out health physics, and or perform quality assurance functions may report to the appropriate onsite manager; however, the sey individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

ARKANSAS - UNIT 2

Amendment No. 5,52,57,73,85,87,98,114,119, 209, A1

Attachment 2 to 2CAN0103XX Page 40 of 78

6.2.2 UNIT STAFF

A11 A12 b A11

Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.1.A non-licensed operator shall be on site when fuel is in the reactor and two additional non-licensed operators shall be on site when the reactor is in MODES 1, 2, 3, or 4.

At-least-one-licensed Operator shall be in the control room when fuel is in the reactor. The minimum shift crew composition for licensed operators shall meet the minimum staffing requirements of 10 CFR 50.54(m)(1)(i) for one unit, one control room.

Amendment No. 5,52,57,73,85,87,98,114,119, 209. Attachment 2 to 2CAN0103XX Page 41 of 78

- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) for one unit, one control room, and 6.2.2 a and 6.2.2 ofor 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.
- d. An individual qualified in radiation protection procedutes shall be on site when fuel is in the reactor. The position may be vacious for not more than 2 hours, in order to provide for unexpected able lice, or not more than action is taken to fill the required position.
- e. All CORE ALTERATIONS shall be directly cut of by either incensed Senior Reactor Operator or Senior Reactor Op Handling who has no other concurrent responded with the during this operation.
- F.g. In MODES 1, 2, 3, or 4, an individual shall provide advisory technical L7 support for the unit-operations shift upervise with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
- ge. Administrative control all be established to light The amount of overtime worked by plant-unit staff members performing safety-related functions. These administrative cols-shall be limited and controlled in accordance with with the NRC Policy Statement on working hours (Generic Letter No. 82-12)

The operations manager or the assistant operations manager shall hold a conior reactor operations SRO license.

ARKANSAS - UNIT 2

Amendment No. 17,25,29,52,73,85, 87,98,114, 132,209



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6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971ANS 3.1-1978 for comparable positions, except for (4)-the designated radiation protection manager, who shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, September 1975.

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6-5 (Next page is page 6-12a

Amendment No. 5, 12, 17, 20, 29, 52, 73, 85, 98, 114, 119, 132, 147, 160, 209, 233
Attachment 2 to 2CAN0103XX Page 45 of 78

- c. The provisions of Specification 4.0.3 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 Technical Specification.



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6-5 (Next page is page 6-12a

Amendment No. 5, 12, 17, 20, 29, 52, 73, 85, 98, 114, 119, 132, 147, 160, 209, 233

6.5.14 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
 - 1. A change in the TS incorporated in the license or
 - A change to the updated SAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the SAR.
- d. Proposed changes that do not meet the criteria of 6.5.14b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the_NRC on a frequency consistent with 10 CFR 50.71(e).



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6.7 SAFETY LIMIT VIOLATION



Attachment 2 to 2CAN0103XX Page 48 of 78 ADMINISTRATIVE CONTROLS

6.8.3 Deleted

6.5 Programs and Manuals

- 6.8.4 The following programs shall be established, implemented, and maintained:
 - <u>a. 6.5.4 Radioactive Effluent Controls Program</u>

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

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- 4)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;
- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS, conforming to 10 CFR Part 20, Appendix B, Table II, Column 2;
- 3)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;
- 4)ci. 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;



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; Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days.

- 6). 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;
- 7)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 II, Column 1;

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6-14

Amendment No. 5,52,73,85,91,98,114,119,147,160,193 ,205,209

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6.9_6.6 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following A11 reports shall be submitted to the Administrator of the Regional Office unless otherwise noted.

STARTUP REPORT / LA2

6.9.1.1 A cummany report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design of has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

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6-14a

Amendment No. 5,52,73,85,91,98,114,119,147,160,193, 205 Attachment 2 to 2CAN0103XX Page 50 of 78 ADMINISTRATIVE CONTROLS

ANNUAL REPORTS #

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

6.9.1.5. Reports required on an annual basis shall include:

6.6.1 Occupational Radiation Exposure Report (Note: A single submittal may be made for ANO. The submittal should combine sections common to both units.)

-A tabulation on an annual basis for of the number of station, utility, and other a_ personnel (including contractors), for whom monitoring was personnel (including contractors), for whom monitoring was personnel at the second se A18 annual deep dose exposures equivalent greater than 100 mremys, and their associated collective deep dose equivalent (reported oper opiman vem) exposure according to work and job functions,²⁴ (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions/ A18 may be estimateed based on pocket ionization them ber. them and he because dosimeter.-(TLD), electronic dosimeter, or film badge measurements, Small exposures totalling less than 20% percent of the individual total dose need not be accounted for. In the aggregate, at least 80% percent of the total whole body deep dose equivalent received from external sources shall show be assigned to specific major work functions. The report overlag the revious chendar year shall be submitted by April 30 of each year. L9

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b. <u>6.6.7 Steam Generator Tube Surveillance Reports The complete results</u> of steam generator tube inservice inspections performed during the report period (reference Specification 4.4.5.5.b).

a. Following each inservice inspection of steam generator tubes the number of tubes plugged in each steam generator shall be reported to the Commission within 15 days.

b The complete results of the steam generator tube inservice inspection shall be reported within 12 months following the completion of the inservice inspection. This report shall include:

- 1. Number and extent of tubes inspected.
 - V. MAR
- 2. Location and percent of wall-thickness penetration for each indication of an imperfection.
- 3. Identification of tubes plugged.
- c. Results of steam generator tube inspections, which fall into Category C-3, shall be reported in a Special Report pursuant to Specification 6.9.2 to the Commission as denoted by Table 4.4-2-6.5.9-2. Notification of the Commission will be made prior to resumption of plant operation (i.e., prior to entering Mode 4). The written Special Report shall provide a description of the investigations conducted to determine the cause of the tube degradation and the corrective measures taken to prevent recurrence.

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Attachment 2 to 2CAN0103XX Page 51 of 78 Documentation of all challenges to the pressurizer safety valves. **£** A1 Deleted d. 6.6.8 The results of specific activity analysis in which the primary coolant A1 exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded the results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station This tabulation supplements the requirements of \$20,407 of 10 CER Part 20. A18

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> starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

> > IA1

6.6.4 MONTHLY OPERATING REPORTS (A1

6.9.1.6 Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the Administrator of the Regional Office 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:



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Amendment No. 60,63,91,123,145,157,193 Attachment 2 to 2CAN0103XX Page 54 of 78 ADMINISTRATIVE CONTROLS

6.6.3 RADIOACTIVE EFFLUENT RELEASE REPORT * A1 8-9-3-The Radioactive Effluent Release Report covering the operation of the unit in the A21 previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report 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. A21 *-{Note: A single submittal may be made for ANO. The submittal sha Combine these sections that are common to both units. The submittal shall specify the releases of radioactive material from each unit.) Move note up on this line,

Amendment No. 60,94,120,157,193



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6.6.2 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT * 1

6-9-4-The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

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 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.

*-<u>(Note:</u>A single submittal may be made for ANO. The submittal should combine those sections

Move note up.

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ARKANSAS -- UNIT-2

6.6.5 CORE OPERATING LIMITS REPORT (COLR)

6.8.5 <u>a.</u> <u>The coreCore</u> operating limits shall be established <u>prior to each reload</u> <u>cycle, or prior to any remaining part of a reload cycle, and shall be documented in</u> the CORE OPERATING LIMITS REPORT <u>for the following</u>:prior to each reload cycle or any remaining part of a reload cycle.

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- 3.1.1.1 Shutdown Margin-T_{avg} > 200°F
- 3.1.1.2 Shutdown Margin-T_{evg} ≤ 200°F
- 3 1.1.4 Moderator Temperature Coefficien
- 3.1.3.1 CEA Position
- 3.1.3.6 Regulating And Group P CE/ Insertion
- 3.2.1 Linear Heat Rate
- 3.2.3 Azimuthal Power -T.a
- 3.2.4 DNBR Margin
- 3.2.7 Axial Shape Index
- 6.9.5.1 <u>b.</u>The analytical methods used to determine the core operating limits addressed by the individual Technical Specifications shall be those previously reviewed and approved by the NRC-for use at ANO-2, specifically those described in the following documents:
 - 1) "The ROCS and DIT Computer Codes for Nuclear Design", CENPD-266-P-A, April 1983 (Methodology for Specifications 3.1.1.1 and 3.1.1.2 for Shutdown Margins, 3.1.1.4 for MTC, 3.1.3.6 for Regulating and Group P CEA Insertion Limits, and 3.2.4 b for DNBR Margin).
 - 2) "CE Method for Control Element Assembly Ejection Analysis," CENPD-0190-A, January 1976 (Methodology for Specification 3.1.3.6 for Regulating and Group P CEA Insertion Limits and 3.2.3 for Azimuthal Power Tilt)
 - "Modified Statistical Combination of Uncertainties, CEN-356(V)-P-A, Revision 01 P-A, May 1988 (Methodology for Specification 3.2.4.c and 3.2.4.d for DNBR Margin and 3.2.7 for ASI).
 - "Calculative Methods for the CE Large Break LOCA Evaluation Model," CENPD-132-P, August 1974 (Methodology for Specification 3.1.1.4 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI).
 - 5) "Calculational Methods for the CE Large Break LOCA Evaluation Model," CENPD-132-P, Supplement 1, February 1975 (Methodology for Specification 3.1.1.4 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI).
 - 6) "Calculational Methods for the CE Large Break LOCA Evaluation Model," CENPD-132-P, Supplement 2-P, July 1975 (Methodology for Specification 3.1.1.4 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI).

ARKANSAS - UNIT 2

Additional pages

will be added as

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pages are created.

3)

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- 7) "Calculative Methods for the CE Large Break LOCA Evaluation Model for the Analysis of CE and W Designed NSSS," CEN-132, Supplement 3-P-A, June 1985 (Methodology for Specification 3.1.1.4 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI).
- 8) "Calculative Methods for the CE Small Break LOCA Evaluation Model," CENPD-137-P, August 1974 (Methodology for Specification 3.1.1.4 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI).
- 9) "Calculative Methods for the CE Small Break LOCA Evaluation Model," CENPD-137, Supplement 1-P, January 1977 (Methodology for Specification 3.1.1.4 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI)

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6.6.5 CORE OPERATING LIMITS REPORT (COLR) (Continued)

- All A1 Except 85 noted
- 10) "Calculative Methods for the CE Small Break LOCA Evaluation Model,"CENPD-137, Supplement 2-P-A, dated April, 1998 (Methodology for Specification 3.1.1.4 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI).
- "CESEC-Digital Simulation of a Combustion Engineering Nuclear Steam 11) Supply System," December 1981 (Methodology for Specifications 3.1.1.1 and 3.1.1.2 for Shutdown Margin, 3.1.1,4 for MTC, 31, 3.1 for CEA Position, 3.1.3.6 for Regulating CEA and Group P Insertion Limits, and 3.2.4.b for DNBR Margin).
- "Technical Manual for the CENTS Code," CENPD 282-P-A, February 1991 12) (Methodology for Specifications 3.1.1.1 and 3.1.1.2 for Shutdown Margin, 3.1.1.4 for MTC, 3.1.3.1 for CEA Position, 3 8 6 for Regulating and Group P Insertion Limits, and 3.2.4.b for DNBR Margin.
- Letter: O.D. Parr (NRC) to FM Sterri (CE), dated June 13, 1975 (NRC 13) Staff Review of the Combustion Engineering ECCS Evaluation Model). NRC approval for 6.9.5.1456.5.4) 6 9.5 4 56.6.5.5), and 6.9.5.1.86.6.5.8) methodologies.
- 14) Letter: O.D. Parr (NRC) to A.E. Scherer (CE), dated December 9, 1975 (NRC Staff Review of the Proposed Compustion Engineering ECCS Evaluation Model changes). NRC approval for 6.9.5.1.6-6.6.5.6) methodology
- 1518 Letter K. Kniel (NRC) to A.E. Scherer (CE), dated September 27, 1977 (Evaluation of Topical Reports CENPD-133, Supplement 3-P and CENPD-137, Supplement 1-P), NRC approval for 6.9.5.1.9-6.6.5.9) methodology.
- 16) Letter: 2CNA038403, dated March 20, 1984, J.R. Miller (NRC) to J.M. Griffin (AP&) CESEC Code Verification." NRC approval for 6.9.5.1.116 11) methodology.

"Calculative Methods for the CE nuclear Power Large Break LOCA Evaluation Model," CENPD-132-P, Supplement 4-P-A, Revision 1 Methodology for Specification 3.1.1.4 for MTC, 3.2.1 for Linear Heat Rate, 82.3 for Azimuthal Power Tilt, and 3.2.7 for ASI).

- fuel thermal-mechanical limits, core thermal-hydraulic limits, Emergency Core Cooling System (ECCS) limits, nuclear limits such as shutdown marginSDM, and transient analysis limits, and accident analysis limits) of the safety analysis are met.
- 6.9.5.3 d. ____The CORE OPERATING LIMITS REPORTCOLR, including any mid-cycle revisions or supplements, thereto, shall be provided upon issuance to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector for each reload cycle to the NRC.

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6-21a

Amendment No. 157.164,169,179,182,197 A11





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6.12.2 (DELETED)

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6.136.7 HIGH RADIATION AREA

A1

6.13.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area (as defined in 20.202(b)(3) of 10 CFR 20) in which the intensity of radiation is 1000 mrem/hr or less shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring the issuance of a radiation work permit. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

A1 - A radiation monitoring device which continuously indicates the radiation dose rate in the area.

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 rate level in the area has been established and personnel have been made knowledgeable of them.

An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the radiation work permit.

- - As provided in paragraph 20 1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

A1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation

> Each entroway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.

b. Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP), or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

> Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

ARKANSAS - UNIT 2

C.

6-24

Order dated October 24, 1980 Amendment No. 21,29,60,94,98,116, 209



ARKANSAS - UNIT 2

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Order dated October 24, 1980 Amondment No. 21,29,60,94,98,116, 209



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Order dated October 24, 1980 Amendment No. 21,29,60,94,98,116, 209

rre no enclosure exists <u>i reasonably be</u> ntrolled by a locked amicaded ht shall be activated at procedures, or entry into such areas een determined and ontinuously escorted nto such areas. This ng does not require the area as a warning device.

Order dated October 24, 1980 Amendment No. 21,29,60,94,98,116, 209

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6.5 PROGRAMS AND MANUALS

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

All A1 except as noted.

6.146.5.1- OFFSITE DOSE CALCULATION MANUAL (ODCM)

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

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 <u>Annual</u> <u>Radiological Environmental Operating and</u> Radioactive Effluent Release and <u>Annual</u> <u>Radiological Environmental Operating</u> Reports required by Specifications 6.9.3 and 6.9.4.

Licensee initiated changes to the ODCM:

a.

- Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
- <u>s</u>Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and
- 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 edversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
- Shall become effective after approval of the <u>ANO</u> General Manager;, <u>Plant Operations</u>; 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 <u>effective</u>. 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 also-indicate the date (i.e., month and year) the change was implemented.

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Page 67 of 78	except as
ADMINISTRATIVE CONTROLS	noted.

6.156.5.16 CONTAINMENT LEAKAGE RATE TESTING PROGRAM

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, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

In addition, Prior to exceeding conditions which require estation of reactor building integrity per TS 3.6.1.1, the leak rate of the containment purge supply and exhaust isolation valves shall be verified to be within accept within the later of the test has been successfully completed within the later of the test of the test of the test of the test has been successfully completed within the later of the test of test of the test of test of

The peak calculated containment internal pressure for the design basis loss of coolant accident, Pa, is 58 psig.

The maximum allowable containment leakage rate, La, shall be 0.1% of containment air weight per day at Pa.

Leakage rate acceptance criteria are:

- a. Containment leakage rate acceptance criteria is $< 1.0 L_a$. During the first unit startup following each lest performed in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_a$ for the Type B and Type C tests and $\leq 0.75 L_a$ for Type A tests.
- b. Air lock acceptance criteria are:
 - Overall air lock leakage rate is $\leq 0.05 L_a$ when tested at $\geq P_a$.

2. Leakage rate for each door is $\leq 0.01 \text{ La}$ when pressurized to $\geq 10 \text{ psig.}$

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of Specification 4.0.3 are applicable to the Containment Leakage Rate Testing Program.

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Inserts A3 New 6.5.10 Secondary Water Chemistry Monitoring A1 A1 Note 1: PTS EOi shall implement a secondary water chemistry monitoring program using the overall plant 6.4.1.d administrative procedure "Steam Generator Water Chemietry Monitoring, Unit II". to minimize reauires written steam generator tube degradation. The program shall be defined in epecific plant Note procedures for all programs procedures and shall include:- This program provides controls for monitoring secondary specified in water chemistry to inhibit SG tube degradation. The program shall include: Specification A1 6.5 4-a. Identification of a sampling schedule for the critical page bies and control points for these parameters test variables; 2.b. Identification of the procedures used to measure the values of the critical these A1 parameters; A1 3.c. Identification of process sampling points; A1 4-d. Procedures for the recording and management of data. A1 e Procedures defining corrective actions for all off control point chemistry conditions, and A1 €.**f**. A procedure identifying the authority responsible for the interpretation of the data, and the sequence and timing of administrative events required to initiate corrective action. A3 New 6.5.2 Coolant Sciences Outside Containment A1 EOI shall invitement a photon to reduce his program provides controls to minimize A1 leakage from those portions waystems outside containment that would or could contain highly radioactive fluids during a serious transient of accident to ieveis as low as practicable ievels. The program shall include the following: .Provisit stabling Pereventive maintenance and periodic visual inspection A1 ·a. requirements; and 2.b. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals. least once per 18 months. The provisions of Surveillance A1 Requirements 4.0.2 are applicable.

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Inserts

All

A1

3) New 6.5.9, Steam Generator (SG) Tube Surveillance Program

- 4.4.5.0 Each Steam Generator shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program.
- NOTE: The requirements for inservice inspection do not apply during the steam generator replacement outage (2R14).
- 4.4.5.46.5.9 Steam Generator Sample Selection and Inspection

Each steam generator shall be determined OPERABLE during shutdown by selecting and inspecting at least the minimum number of steam generators specified in Table 4.4-46.5.9-1.

4.4.5.28.5.9.1 Steam Generator Tube Sample Selection and inspection

The steam generator tube minimum sample size, inspection result classification, and the corresponding action required shall be as specified in Table $\frac{26.5.9}{2.5.9}$. The inservice inspection of steam generator tubes shall be performed at the frequencies specified in specification 4.4.5.3.65.9 and the inspected tubes shall be verified acceptable per the acceptance criteria of Specification $\frac{46.5.9.3}{5.9}$. The tubes selected for each inservice inspection shall include at least 3% of the total number of tubes in all steam generators; the tubes selected for these inspections shall be selected on a random basis except:

a. Where experience in similar plants with similar water chemistry indicates critical areas to be inspected, then at least 50% of the tubes inspected shall be from these critical areas.

The first sample of tubes selected for each inservice inspection (subsequent to the pre-service inspection) of each steam generator shall include:

All non-plugged tubes that previously had detectable wall penetrations (>20%).

2. Tubes in those areas where experience has indicated potential problems.

3. A tube inspection (pursuant to Specification 4.4.5.46.5.9.3.a.9) shall be performed on each selected tube. If any selected tube does not permit the passage of the eddy current probe for a tube inspection, this shall be recorded and an adjacent tube shall be selected and subjected to a tube inspection.

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- c. The tubes selected as the second and third samples (if required by Table 4-4-26.5.9-2) during each inservice inspection may be subjected to a partial inspection provided:
 - 1. The tubes selected for these samples include the tubes from those areas of the tube sheet array where tubes with imperfections were previously found.
 - 2. The inspections include those portions of the ubes where imperfections were previously found.

The result of each sample inspection shall be classified into one (the following three categories:

Category	Inspection Results
C-1	Less than 5% of the total tubes inspected are degraded tubes and none of the inspected tubes are defective
C-2	One or more tubes, but not more than 1% of the total tubes inspected are detective, or between 5% and 10% of the total tubes inspected are degraded
C-3	More than 10% of the total tubes inspected are degraded are degraded tubes or more than 1% of the inspected
	tubes are defective.

Note: In all inspections, previously degraded tubes must exhibit significant (>10%) further wall penetrations to be included in the above percentage calculations.

4.4.6 9.2 Inspection Frequencies

The above required inservice inspections of steam generator tubes shall be performed at the following frequencies:

The first inservice inspection shall be performed after 6 Effective Full Power Months but within 24 calendar months of initial criticality. Subsequent inservice inspections shall be performed at intervals of not less than 12 nor more than 24 calendar months after the previous inspection. If two consecutive inspections following service under AVT conditions, not including the preservice inspection, result in all inspection results falling into the C-1 category or if two consecutive inspections demonstrate that previously observed degradation has not continued and no additional degradation has occurred, the inspection interval may be extended to a maximum of once per 40 months. Attachment 2 to 2CAN0103XX Page 71 of 78

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- b. If the results of the inservice inspection of a steam generator conducted in accordance with Table 4.4-2-6.5.9-2 at 40 month | intervals fall into Category C-3, the inspection frequency shall be increased to at least once per 20 months. The increase in inspection frequency shall apply until the subsequent inspections satisfy the criteria of Specification 4.4.5.3.a6.5.9.2.a; the interval | may then be extended to a maximum of once per 40 months.
- c. Additional, unscheduled inservice inspections shall be performed on each steam generator in accordance with the first sample inspection specified in Table <u>2.6.5</u> during the shutdown subsequent to any of the following conditions

1. Primary-to-secondary tube leaks (not including leaks originating from tube-to-tube sheet welds) in excess of the limits of Specification 3.4.6.2.

- 2. A seismic occurrence greater than the Operating Basis Earthquake.
- 3. A loss-of coolant accident requiring actuation of the engineered safeguards.
- 4. A main steam line or feedwater line breat

4.4.5.46.5.9.2 Acceptance Criteria

3

- a. As used in this Specification
 - <u>Tubing or Tube</u> means that portion of the tube which forms the primary system to secondary system pressure boundary.
 - 2. <u>Imperfection</u> means an exception to the dimensions, finish or contour of a tube from that required by fabrication drawings or specifications. Eddycurrent testing indications below 20% of the nominal tube wall thickness, if detectable may be considered as imperfections.
 - Degradation means a service-induced cracking, wastage, wear or general corrosion occurring on either inside or outside of a tube.
 - 4. <u>Degraded Tube</u> means a tube containing imperfections ≥20% of nominal wall thickness caused by degradation.
 - 5. <u>% Degradation</u> means the percentage of the tube wall thickness affected or removed by degradation.
 - 6. <u>Defect</u> means an imperfection of such severity that it exceeds the plugging limit. A tube containing a defect is defective.

All A1

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All

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b.

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- 7. <u>Plugging Limit</u> means the imperfection depth at or beyond which the tube shall be removed from service by plugging because it may become unserviceable prior to the next inspection. The plugging limit is equal to 40% of the nominal tube wall thickness.
- 8. <u>Unserviceable</u> describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of an Operating Basis Earthquake, a loss-of-coolant accident, or a steam line or feedwater line break as specified in 4.4.5.3.0 9.2.0 above.
- 9. <u>Tube Inspection</u> means an inspection of the steam generator tube from tube end (cold leg side) to tube end (hot leg side).
- 10. <u>Pre-service Inspection</u> means an inspection of the full length of each tube in each steam generator performed by eddy current techniques prior to service to establish a baseline condition of the tubing. This inspection shall be performed after the hydrostatic test and prior to POWER OPERATION using the equipment and techniques expected to be used during subsequent inservice inspections.

The steam generator shall be determined OPERABLE after completing the corresponding actions (plug all tubes exceeding the plugging limit and all tubes containing through wall cracks) required by Table 4.4-26.5.9-2.



MINIMUM NUMBER OF STEAM GENERATORS TO BE INSPECTED DURING INSERVICE

POLICIPACITY.	201010701077			
Pre-service Inspection	NHHA.		Yes	
No. of Steam Generators	per Unit	W.	Two	
First inservice Inspection			One	
Second & Subsequent Ins	ervice Inspect	tions	One ¹	

Table Notation

1. The inservice inspection may be limited to one steam generator on a rotating schedule encompassing 3 N % of the tubes (where N is the number of steam generators in the plant) if the results of the first or previous inspections indicate that all steam generators are performing in a like manner. Note that under some circumstances, the operating conditions in one or more steam generators may be found to be more severe than those in other steam generators. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

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TABLE 4.4-2-6 5.9-2

All A1



STEAM GENERATOR TUBE INSPECTION

S = 3 (2/n) % Where n is the number of steam generators inspected during an inspection.

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4) New 6.5.13 Diesel Fuel Oil Testing Program

4.8.1.1.2.5

LA1 At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage lank obtained in accordance with ASTM-D270-65, is within the acceptable limits specified in Table 1 of ASTM D975-74 when checked for viscosity, water and sediment

M1 A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program hall include sampling and testing requirements, and acceptance criteria, at in a data with applicable ASTM Standards. The purpose of the programs to establish the following:

a. Acceptability of new fuel oil for use of to a bition to the tanks by determining that the fuel oil has:

- 1. an API gravity or an absolute specific with within limks.
- 2. a flash point and kinem cosity within this for ASTM 2D fuel oil, and

L1

- 3. water and sedim within / its:
- b. Within 31 days for vind additie of new for oil to storage tanks, verify that the proper of the new Loil, other than those addressed in a above, are with limits for AS 20.4 poil:

A2 provisions of 0.2 and 0.3 are applicable to the Diesel Fuel Oil Testing

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Inserts

		. A	
Control Room Emergency Air Filtration System	Fuel Handling Area Ventilation System	New Ventilation Filtration Program	
SR 4.7.6.1.2.b., c., d.1.e. & f.	SR 4.9.11.2	TS 6.5.11	
Each control room omorgancy air filtration	The fuel handling grag ventilation of mechail	A program shall be established to	
evetom-chall be demonstrated OPERABLE	be clamonstrated OPERARIE at the Mountain	implement the following required testing	
	fraction using intertiated function	of Engineered Safeguards (ES)	
	storage.gool:	ventilation overence filters at the	
·		frequencide specified in Regulatory	
		Cuide 1.52 Povision 2 The VETP is	
		Suide 1.52, Revision 2. The virit is	
		Ventilation System (EHAVS) and the	
		Control Doom Emorgonary Ventilation	
		Surfam (CREV(S)	
47842h	10.11.2	System (CREVS).	
	At long and any 10 mains and after	*	
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structural-maintenance on the HEPA filler or	charcosi coloritati (2) (silatini		
charcoal accorbor housings, or (2) following	politica fa		(A4)
painting fire-prohemical release in any			
vanilation roop concernation with the	evertain a		$ $ \checkmark
Achteria pra	Character and the second se		
oyoroin-oy-		·	
Voiltying Bist the cleanup systems	Serving Swoniicaon System		
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criteria and uses the to codures of			(M2)
Damilabas Dardona C.6 C.5. and	(Constant Outra 16) Parisian		
C in a Deculation (152 Devision	2 2 and the success for the sectors for the se		$ $ \checkmark
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Inserts

Control Room Emergency Air Filtration System	Fuel Handling Area Ventilation System
 SR 4.7.6.1.2.D., c., d.1,e. & f. Verifying within 31 days after removal that <u>Demonstrate that</u> a laboratory analysis lest of a representative carbon sample of the charcoal adsorber obtained in accordance with Provide 4-52. Revision 2, March 1978, meets the laboratory testing criteria of ASTM D3803-1989 when tested at 30°C and 95% relative humidity for a methyl iodide penetration of: when obtained as described in Regulatory Guide 1.52. Revision 2, for CREVS Aj. ≤ 2.5% for 2 inch charcoal adsorber beds, or bjj. ≤ 0.5% for 4 inch charcoal adsorber beds. 	 SR 4.9.11.2 Verifying within 31 days after level that Demonstrate that a laboratory analysis test of a representativ analysis test of a representativ sample of the charcoal adsorber meets the laboratory testing friteria of ASTM D3803-1989 when tested at 30°C and 95% or Regulatory Guide 1.52, Revit 2, March 1079, showe the mothyl lockids penetration loss than 5 locked in accordance with 1% time atory testing friteria of ASTM D3803-1989 when tested at 30°C and 95% a relative humidity 1.95% methyl lock at a mperature 4.30°C and 95% a relative humidity 1.95% methyl lock at a mperature 4.30°C and 95% or 2 inch charcoal adsorber beds; and 1.
3- Verifying a system flow rela 19% during system operation with accordance with ANSI-N510-1975	3Vering a system flow rate of 39,700 -10% during system operation when verify a system flow rate is included in PTS 6.5.11a, b, and d, 1975.

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Inserts

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		A AL	
Control Room Emergency Air Filtration System	Fuel Handling Area Ventilation System	New Ventilation Filtration Program	1
SR 4.7.6.1.2.b., c., d.1,e. & f.	SR 4.9.11.2	TS 6.5.11	
4.7.6.1.2.c	4.9.11.2.b	C. Demonstrate that a laboratory test	
After every 720 hours of chargest accorbor	Atter even, 720 hours of chanceal accorder 🔊	of a sample of the charcoal	[A4]
operation by vorifying within 31 days after	operation by verifying within 31-day	adsorber meets the laboratory	k /
removal Demonstrate that a laboratory	removal Demonstrate that a laboratory	testing criteria of ASTM D3803-	
analysistest of a representative carbon sample	analysis test of a representation cart	1989 when tested at 30°C and 95%	
of the charcoal arisorber ebiained in	sample of the charcoal adsorber obtained	relative humidity for a methyl jodide	
accordance with Resultation, Regimen C.S. a. of	accardance with Requisition Position C.6.6. and	penetration of:	Y la1 \
Requiatory Guide 1.52, Revision 2, March	Regulatory Guide 1.52, Revel	1. <5% for the FHAVS; and	
1978, meets the laboratory testing criteria of	1978 chows the mothed in money too loss	when obtained as described	
ASTM D3803-1989 when tested at 30°C and	ihan 5.0% when tested incoordant	in Regulatory Guide 1.52	
95% relative humidity for a methyl iodide	withmeets the laboration testing contribution	Revision 2, for CREVS	
penetration of:	ASTM D3803-1989 and temper to of w	i <2.5% for 2 inch charcoal	
1.2 when obtained as described in	tested at 30°C and a subjve midity of 95%	adsorber beds: and	
Regulatory Guide 1.52. Revision 2. for	relative hundling for a methy dide	ii <0.5% for 4 inch charcoal	
CREVS	penetration	adsorber beds	
$\leq 2.5\%$ for 2 inch charcoal adsorber	1. <5% B FHAVS: and		
beds. or			'
2.1 < 0.5% for 4 inch charcoal adsorber			
beds.			
4.7.6.1.2.d All least low new Armithe and			
47612d1	491120	d Demonstrate for the	
1. Verifying Demonstrate A FHAV/S		EHAVS and CREVS that	(84)
and CREVS that the pressure drop	verifying monstrate for the FHAVS and	the pressure drop across	NJ
across the combined HEPA filters rules	CREVS that the pressure drop across the	the combined HEPA filters	$ \succ$
filers in the system and charcoal	combined HEPA filters	other filters in the system	/ мз
adsorbers backs is < 6 inches Notar	weight and charcoal adsorbers backs is < 6	and the charcoal adsorbers	
water Gauna ubile operation	inches atoryator Cougo white	is < 6 inches of water when	$ \searrow$
at the system at adesige flow rate	a any an instari at the system at a then	tested at the system design	
2000.cim.+ 10%	an design flow rate of 30,700 of \pm 10%	flow rate + 10%	
CREVS 2 000 cfm	HAVS 30 700 cim	FHA\/S 39 700 cfm	
ALLINGAN SUMAN	W W W W W W W W W W W W W W W W W W W	CREVS 2 000 cfm	
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Control Room Emorroy Air Filtentian Out		<u>A</u>
SP 4 7 6 1 2 b c d 1 c 9 f	Fuel Handling Area Ventilation System	New Ventilation Filtration Program
A 7 0 4 0 -	SR 4.9.11.2	5 6,5.11
4.7.5.1.2.6.	4.9.11.2.d	a Demonstrate that an in place cold
and a second of other a molecomont of a	After each complete or partial replacement	DOP test of high efficiency particulate A4
Demonstrate that an in place cold DOP test of	Demonstrate that an in place cold D	(HEPA) filters shows:
<u>a nich efficiency particulate (HEPA) filters bank</u>	of a high efficiency particulate of a (HEPA)	1. ≥ 99% DOP removal for the FHVAS
by vorifying that theshow HEPA Altor banks	filters bank by verifying that the HER	when tested in accordance with
remove	banks-ramova- <u>show</u>	Regulatory Guide 1.52, Revision 2
2.≥99.95% of the DOP removal for the	a ≥ 99% of the DOP removal for the FHAVS	and ANSI N510-1975, at the
CREVS when they are tested in place in	when they are tested in place in accordance	system design flow rate of 39 700
accordance with Regulatory Guide 1.52	with Regulatory Guide 1 Revision and	of m + 10%; and
Revision 2 and ANSI N510-1975, while	ANSI N510-1975 while contine the	2 > 00.05% DOP removed for the
operatingat the system at-adesign flow rate of	system at adesion flow rate of 39 700 days	2. 2 99.95% DOP removal for the
2000 cfm ± 10%.	10% and	with Populatons Quide 4.52
		Will Regulatory Guide 1.52,
		revision 2 and ANSI No10-1975,
		at the system design now rate of
476121		2,000 cm ± 10%
Demonstrate that as in place belowned ad	4.9.1152.6	b. Demonstrate that an in place
bydiocathon tost of the charged adeathed	Demonstration at an in place narogenated	halogenated hydrocarbon test of the
shows:	or the charceal adsorbers	charcoal adsorbers shows:
2 Mar anal 1997		1. ≥ 99.95% halogenated hydrocarbon
	TXXX-run-Escarcoubions or Cartai	removal for the FHAVS when A4
but unching that the staff and states	Veli gennes a ganarcea accorea	tested at the system design flow
the state of the s	owned that the charceal	rate of 39,700 cfm ± 10%; and
remove-2 99.95% a nalogenated	ad ers remove ≥ 99.95% of a	2. ≥ 99.95% halogenated hydrocarbon
nyorocarbon terrigia:	halogenated hydrocarbon refrigerant	removal for the CREVS when
TOP CIRE VS When they are tested in-	te s-removal for the FHAVS when	tested in accordance with
piace in accordance with 200510-	Ministra-tested in-place-in-accordance	Regulatory Guide 1.52, Revision 2.
1079Regulatory Guide 1.52.1 Ion 2.	ANSI-N510-1975-while-operating-at	at the system design flow rate of
while operating at the system and an	the system at adesign flow rate of	2000 cfm + 10%
flow rate of 2000 cfm ± 10%.	39,700 cfm ± 10%; and -	
N/A	N/A	The provisions of SR 4.0.2 and SR 4.0.3 (A2
le la companya de la c		are applicable to the VFTP test
		frequencies