December 31, 2002

Tom,

Enclosed please find a draft copy of the proposed change to reorganize Section 6.0 of the ANO-2 Technical Specifications. I am still writing letter but want to talk with you and Bob before I complete the letter to be sure I am communicating the information in a way that will assist Bob in the review.

Thank you in advance for your assistance,

Dana Millar
Entergy

2CAN0103XX

January 30, 2003

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

SUBJECT: Arkansas Nuclear One, Unit 2
Docket No. 50-368
License Amendment Request to Revise Various Technical Specifications and the Administrative Controls Section

REFERENCES:

1. Letter dated August 22, 2001, Proposed Emergency Plan Change (0CAN080103)
2. Letter dated February 22, 1999, Additional Information Concerning Proposed Administrative Controls Technical Specifications Changes (0CAN029902)
3. Letter dated March 7, 1997, Issuance of Amendment No. 180 to Facility Operating License No. NPF-6 – Arkansas Nuclear One, Unit 2 (TAC NO. M77399) (2CNA039701)
4. Letter dated July 31, 2001, Change to the ANO-2 Reactor Coolant Pump Flywheel Inspection Interval Surveillance Requirements (2CAN070107) and subsequent NRC Safety Evaluation Related to ANO-2 Amendment 241, dated April 11, 2002
5. NRC Safety Evaluation Related to ANO-2 Amendment 218, dated August 17, 2000
6. Letter dated March 13, 2002, Proposed Changes to Support Implementation of ANO-1 Improved Technical Specifications (ITS) (1CAN030201) and subsequent NRC Safety Evaluation Related to ANO-1 Amendment 218 dated June 10, 2002 (TAC NO. MB4750)
7. NRC Approval of Quality Assurance Program Manual dated November 6, 1998 (TAC NO. M97893)
8. NRC Safety Evaluation Related to ANO-2 Amendment 180, dated March 7, 1997 (Addition of Low Temperature Overpressure Protection Requirements)
9. Letter dated January 31, 2002, Revision of Section 6.0, Administrative Controls For Consistency with ANO-1 Improved Technical Specifications (2CAN010203)
10. Letter dated June 26, 2002, Revision of Section 6.0, Administrative Controls For Consistency with ANO-1 Improved Technical Specifications (2CAN060203)

Dear Sir or Madam:

By letters (References 9 and 10), Entergy Operations, Inc. (Entergy) proposed changes to the Arkansas Nuclear One, Unit 2 (ANO-2) Technical Specifications (TSs) to reorganize the Administrative Controls section of the ANO-2 TSs and to modify various other TS actions and surveillance requirements. Based on reviews by your staff, more detailed explanations and justifications were requested. In addition, it was encouraged that the presentation of the proposed change be modified similar to the format used for improved TS conversion projects. Therefore, in order to accommodate these requests, this letter will supercede the previously submitted requests (References 9 and 10).

Pursuant to 10CFR50.90, Entergy Operations, Inc. (Entergy) hereby requests the following amendment for Arkansas Nuclear One, Unit 2 (ANO-2): 1) reorganization of the ANO-2 Technical Specification (TS) Section 6.0 Administrative Controls; and 2) modification of various TS actions and surveillance requirements.

The proposed change has been evaluated in accordance with 10CFR50.91(a)(1) using criteria in 10CFR50.92(c) and it has been determined that this change involves no significant hazards considerations. The bases for these determinations are included in the attached submittal.

The proposed change includes new commitments as summarized in Attachment 4. The NRC has not approved similar Technical Specification changes for other plants.

Entergy requests approval of the proposed amendment by July 19, 2003. Once approved, the amendment shall be implemented within 120 days. Although this request is neither exigent nor emergency, your prompt review is requested.

If you have any questions or require additional information, please contact Dana Millar at 601-368-5445.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 30, 2003.

Sincerely,

CGA/dm

Attachments:
1. Analysis of Proposed Technical Specification Change
2. Proposed Technical Specification Changes (mark-up)
3. Changes to TS Bases pages – For Information Only
4. List of Regulatory Commitments

cc: Mr. Ellis W. Merschoff
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Little Rock, AR 72205

Attachment 1

2CAN0103XX

Analysis of Proposed Technical Specification Change

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 the ANO-2 Technical Specifications as follows:

1.1 Facility Operating License (FOL) Changes

- FOL 2.C.(5), Secondary Water Chemistry Monitoring

  This license 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 Discussion of Changes (DOC) A1 and A3.

  ANO-1 Comparison

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

  NUREG-1432 Comparison

  NUREG-1432, Revision 2, *"Standard Technical Specifications Combustion Engineering Plants,"* 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-1 ITS. 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.

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

  This license condition will be deleted and an equivalent programmatic requirement will be added as PTS 6.5.2. The requirements of the condition will be retained with only minor non-technical administrative changes. See DOC A1 and A3.

  ANO-1 Comparison

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

  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

systems to which the program is applied have been previously identified in response to NUREG-0578. 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 applies 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.

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

  This license condition will be deleted and no equivalent programmatic requirement will be added. See DOC A5.

  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 Comparison

  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."

  ANO-2 has eliminated the post accident sampling system requirements from TSs with the approval of amendment 218 dated August 17, 2000 (reference 5). Therefore, this FOL condition will be deleted and no new TS will be established as allowed by the reviewer's note in NUREG-1432.

1.2 Index Pages

The Index pages will be changed to reflect the correct titles and page numbers based on the changes proposed. The proposed changes are non-technical administrative changes. See DOC A1.

1.3 Section 1.0, Definitions – Core Operating Limits Report, 1.33

The reference to Technical Specification 6.9.5 will be changed to Technical Specification 6.6.5. See DOC A1.

ANO-1 ITS 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.

1.4 Radiation Monitoring Instrumentation, TS 3.3.3.1, Table 3.3-6

A new action 21 will be added and 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. See DOC A1.

1.5 Radiation Monitoring Instrumentation, TS 3.3.3.1, Table 3.3-6, Table Notation

Action 17

Action 17 will be modified to be applicable in Modes 1, 2, 3, or 4 and a shutdown statement will be added. See DOC A1, M4, and M5.
Actions 18 and 19 2) will be changed to direct that Special Reports be sent to the NRC. See DOC A6.

ANO-1 ITS 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.

Action 20

Action 20 will be modified to be applicable in Modes 1, 2, 3, or 4 and a shutdown statement will be added. See DOC M3, M4, and M5

ANO-1 ITS Comparison

ANO-1 ITS 3.3.16 Actions A and C are associated with the inoperability of one channel. Action A allows 7 days to place one OPERABLE Control Room Emergency Ventilation System train in the emergency recirculation mode. Action C requires the unit be in Mode 3 within 6 hours and Mode 5 in the following 30 hours if one operable control room ventilation system cannot be placed in the emergency recirculation mode of operation within the 7 day allowance of action A. The proposed change is consistent with the allowable outage times. Due to ITS format and usage rules, the wording in the ANO-2 proposed change is not exactly the same as the ANO-1 ITS. However, the intent of the ANO-1 specification is reflected in the proposed wording.

NUREG-1432 Comparison

NUREG-1432 LCO 3.3.9 addresses the control room isolation signal and requires only one operable channel. Because ANO-2 requires two channels to be operable, there is no related NUREG-1432 condition.

Action 21

A new Action 21 will be added which will be applicable during handling of irradiated fuel. See DOC M5.

ANO-1 ITS 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.

1.6 Radiation Monitoring Instrumentation Surveillance Requirements, Table 4.3-3

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. See DOC A1. The addition of Note 6 is less restrictive. See DOC L2.

ANO-1 ITS 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.

1.7 Table 3.3-6, Actions 18 and 19

These actions require submittal of a special report to the Commission pursuant to specification 6.9.2 for the containment high range and main steam line radiation monitors when restoration cannot be accomplished. Specification 6.9.2 will be deleted. However, the requirement to submit the special report will be retained. Only minor wording changes are proposed in the current actions to delete reference to specification 6.9.2 and to state that the report should be submitted to the NRC. Written communication to the NRC is described in 10 CFR 50.4 and therefore, the proposed change will reference that the report be submitted to the NRC. The 10 CFR 50.4 guidance adequately ensures that the regional office will receive a copy of the report. This is an administrative change.

ANO-1 ITS Comparison

ANO-1 ITS requires a special report when the reactor building high range radiation monitors are inoperable. 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

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 submittal of the special report within 30 days. 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.

1.8 Post-Accident Monitoring Instrumentation, Table 3.3-10

The phrase "pursuant to specification 6.9.2" will be deleted in Actions 3.b and 4.b. See DOC A6.

ANO-1 ITS 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.

1.9 Steam Generators, TS Surveillance Requirements (SRs) 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

A Steam Generator Tube Surveillance Program will be added as PTS 6.5.9. The current Note which states: "The requirements for inservice inspection do not apply during the steam generator replacement outage (2R14)." will be deleted as the steam generator replacement outage has already occurred. The current TS Table 4.4-2 requires submittal of a special report to the NURC pursuant to specification 6.9.2. Steam Generator reporting requirements contained in current TS 4.4.5.5 will be relocated to Specification 6.6.7. Specification 6.9.2 2ill be deleted and, therefore, the reference in PTS Table 6.6.5.9-2 will be changed to reflect the new Specification 6.6.7. See Markup of Inserts and DOC A1.

ANO-1 ITS Comparison

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 minor changes. Thus this change is consistent with the NUREG.

ANO-1 ITS Comparison (Reference to CTS 6.9.2)

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 (Reference to CTS 6.9.2)

Steam generator reporting requirements are contained in Specification 5.6.9 of NUREG-1432. 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.

1.10 Steam Generators, TS SR 4.4.5.5

The Steam Generator reporting requirements will be relocated to PTS 6.6.7. See DOC A20.

ANO-1 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.

1.11 Emergency Core Cooling System, TS 3.5.2 and 3.5.3

The phrase "to the Commission pursuant to Specification 6.9.2" will be changed to "to the NRC." See DOC A6.

ANO-1 ITS 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.

1.12 Containment Isolation Valves, SR 4.6.3.1.4

This SR will be relocated to PTS 6.5.16. The wording in SR 4.6.3.1 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 DOC A1.

ANO-1 Comparison

The relocation of ANO-2 SR 4.6.3.1.4 results in consistency in the location of information between the ANO-1 and ANO-2 TSs. The ANO-1 ITS states that "valves shall be leakage rate tested once." ANO-2 will not adopt the word "once." The use of "once" could be misunderstood since it is possible that more than one test may be required due to finding an excessive leakage rate. Inclusion of the word "once" may give a false sense that only one test is required. Therefore, ANO-2 will not include the word "once."

NUREG-1432 Comparison

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.

1.13 Control Room Emergency Ventilation and Air Conditioning System, TS 3.7.6.1

A new Note 1 and new Actions d. and e. will be added. See DOC A1, A7, and L3.

ANO-1 ITS Comparison

The proposed change captures the intent of ANO-1 ITS 3.7.9 and the associated actions and note 1. Due to the format difference between ITS and CTS minor wording differences are required.

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 (control room emergency air conditioning system) require entry into TS 3.0.3 if both trains of the respective

systems are inoperable. 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 3.7.11, action F and NUREG-1432 Specification 3.7.12, action E require entry into TS 3.0.3 if no control room emergency ventilation or air conditioning systems are operable. The proposed change to ANO-2 TS 3.7.6.1, action e captures the intent of these two NUREG-1432 specifications.

1.14 Control Room Emergency Air Filtration System, SR 4.7.6.1.2

The requirements of this SR will be relocated to PTS 6.5.11, the Ventilation Filter Testing Program (VFTP). See Markup of Inserts and DOC A1, A2, A4, A8, LA1, LA2, M2, and M3.

ANO-1 Comparison

1.15 Shock Suppressors (Snubbers) SR 4.7.8.h

The reference to Specification 6.10.2 will be deleted. See DOC A9.

1.16 Spent Fuel Pool Structural Integrity, TS 3.7.12

The reference to Specification 6.9.2 will be changed to direct the submittal of a Special Report to the NRC. See DOC A6.

1.17 A. C. Sources, TS 3.8.1.1

A new action "f." is being added and the pages are being reformatted which resulted in moving several actions from the page they are currently on to another page. See DOC A1, L4, L5, M6, and A10.

1.18 Sample of Diesel Fuel, SR 4.8.1.1.2.b

This change deletes the current surveillance requirement and implements fuel oil testing requirements in accordance with a new program requirement which will be PTS 6.5.13, "Diesel Fuel Oil Testing Program." See DOC LA1.

1.19 Electrical Power Systems, Shutdown, TS 3.8.1.2

A new action "b." will be added. See DOC L4, L5, M6, and A10.

1.20 Fuel Handling Area Ventilation System, SR 4.9.11.2

This SR requires that the fuel handling area ventilation system be demonstrated operable by performing various tests on the HEPA filters and charcoal adsorbers. The proposed change will relocate these testing requirements to PTS 6.5.11, "Ventilation Filter Testing Program." See DOC A1, A2, LA1, M1, and L1.

1.21 Responsibility, TS 6.1

The proposed changes delete the specific reference to ANO-2 and make other preferred wording changes. See DOC A1 and A13.

1.22 Organization, Offsite and Onsite Organizations, TS 6.2.1

The proposed changes delete the specific reference to ANO-2 and make other preferred wording changes. See DOC A1 and A13.

1.23 Organization, Unit Staff, TS 6.2.2

The proposed change reorganizes the section and provides clarity for the ANO site. In addition, many of the requirements are being removed because they duplicate requirements provided in the Code of Federal Regulations. See DOC A1, A11, A12, L6, and L7. Also see the discussion of differences numbers 5, 6, 7, 8, and 9.

1.24 Unit Staff Qualifications, TS 6.3.1

The proposed change makes minor preferred format changes and replaces the ANSI requirement that is referenced with a different ANS requirement. See DOS M7 and A1.

1.25 Deleted, TS 6.4

The currently deleted section will be replaced with the PTS section entitled "Procedures." See DOC A1.

1.26 Programs, TS 6.5

The statement "6.5.1 through 6.5.6 will be used later." will be deleted and new programs will be added. For the changes to each of the programs in sections 6.5.1 through 6.5.6, see DOC A1, A3, A16, and LA4.

1.27 Steam Generator (SG) Tube Surveillance Program, PTS 6.5.9

The SG Tube Surveillance Program is being relocated from TS 3.4.5 surveillance requirements. The proposed changes include preferred numbering and reference changes. In addition a note is being deleted that refers to the steam generator replacement outage. This outage has already occurred and the note is no longer applicable. See DOC A1.

1.28 Secondary Water Chemistry, PTS 6.5.10

The Secondary Water Chemistry Monitoring program is currently contained as a license condition. The license condition is being deleted and a new program established with the addition of PTS 6.5.10. Minor preferred numbering and wording changes are proposed to the wording that was included as the licensing condition. See DOC A1.

1.29 Ventilation Filter Testing Program (VFTP), PTS 6.5.11

The VFTP will be added and is a combination of the filter testing programs contained in the control room ventilation system and the fuel handing area ventilation system. See DOC A2, A4, M2, M3, and LA1.

1.30 Diesel Fuel Oil Testing Program, PTS 6.5.13

This program relocates the testing requirements from SR 4.8.1.1.2.b. See DOC A2, LA1, and M1. See also the discussion of differences numbers 3 & 4.

1.31 Containment Leakage Rate Testing Program, PTS 6.5.16

This program is being relocated from current TS 6.15. SR 4.6.3.1.4 is also being relocated to be a part of this program. See DOC A1 and A19.

1.32 Deleted, TS 6.6

This section will be permanently deleted. See DOC A1.

1.33 Safety Limit Violation, TS 6.7

This section will be permanently deleted. See DOC A11, A14, and A15.

1.34 Procedures and Programs, TS 6.8

The TS will be renamed and renumbered as Procedures, PTS 6.4. 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. See DOC A1, M8 and M9.

1.35 Deleted, TS 6.8.2 and 6.8.3

These will be permanently deleted. See DOC A1.

1.36 Programs and Manuals, PTS 6.5

This new section will be added and will result in the relocation of several programs to this section. See the individual programs for the associated discussion of changes.

1.37 Radioactive Effluent Controls Program, TS 6.8.4.a

This program will become PTS 6.5.4. Minor preferred wording and numbering changes are proposed. In addition a statement is being added that allows the provisions of SR 4.0.2 and 4.0.3 to be applicable to this program. See DOC A1 and A16.

1.38 Component Cyclic or Transient Limit Program, TS 6.8.4.b

This program will become PTS 6.5.5. Minor preferred wording and grammatical changes are proposed. See DOC A1.

1.39 Reporting Requirements, TS 6.9

These requirements will become PTS 6.6. See DOC A11, LA2, A17, A1, A18, L9, A20, LA3, and A21.

1.40 Deleted, TS 6.10

This section will be deleted permanently. See DOC A1.

1.41 Radiation Protection Program, TS 6.11

The requirement to have procedures for the Radiation Protection Program will be relocated to PTS 6.4.d.

1.42 Deleted, TS 6.12 and 6.12.2

These sections will be deleted permanently. See DOC A1.

1.43 High Radiation Area, TS 6.13

This section will be relocated to PTS 6.7 and re-written to adopt some less restrictive changes. See DOC A1 and L10.

1.44 Offsite Dose Calculation Manual (ODCM), TS 6.14

This program manual will be relocated to PTS 6.5.1. Minor preferred wording changes are proposed. In addition, a change to the ANO staffing organization is reflected. See DOC A1 and LA4.

1.45 Containment Leakage Rate Testing Program, TS 6.15

This program will be relocated to PTS 6.5.16. In addition SR 4.6.3.1.4 will be included in the new program. See DOC A1 and A19.

2.0 PROPOSED CHANGE

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

Designator	Category
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.
L	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.
LA	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.

Need statement in each of the below saying whether it is consistent with NUREG – for those that are not consistent – need DOD.

Need to be sure change is justified.

Administrative	
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. 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.
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.
A4	CTS SR 4.7.6.1.2.b & 4.9.11.2.a, PTS 6.5.11, Ventilation Filtration 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.
A5	License Condition 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 License Condition will be deleted and no new TS created. This is considered an

Administrative	
	administrative cleanup related to the approval of Amendment 218.
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.
A7	An additional Action will be included in TS 3.7.6.1 to direct entry into LCO 3.0.3 if both trains of CREVS or the control room emergency air conditioning system (CREACS) while in Modes 1, 2, 3, or 4. This is equivalent to the CTS requirements and is needed as an explicit condition only due to differences in the implementation.
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.
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.
A10	PTS 4.8.1.1.f.4 and PTS 4.8.1.1.b.4 provide the administrative direction associated with actions f.1, f.2, and f.3.
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 Location — Duplicated Regulation 6.2.2.b — 10 CFR 50.54(m) (2)(iii) 6.2.2.c — 10 CFR 50.54(m)(1) and (m)(2)(iii) 6.2.2.e — 10 CFR 50.54(m)(2)(iv) Table 6.2-1 — 10 CFR 50.54(m)(2)(i) Table 6.2-1 Note * — 10 CFR 50.54(m)(2)(iv) 6.7.1.c — 10 CFR 50.36, 10 CFR 50.72, and 10 CFR 50.73 6.9.1 — 10 CFR 50.4 6.9.2 — 10 CFR 50.4

Administrative		
	6.9.5.3	10 CFR 50.4
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.	
A13	There is only one plant manager between the two units, thus there is no need to designate the specific unit, i.e., ANO-2.	
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 that the Vice President, Operations ANO be notified 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.	
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.	
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.	
A18	PTS 6.6.1 – The proposed change will reflect the correct 10 CFR 20 terminology for the units of occupational exposure. The change will also update the reference to the correct part of 10 CFR 20 (changing 10 CFR 20.407 to 10 CFR 20.2206). 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.	

Administrative	
A19	PTS 6.5.16 – The "≤0.60 L_a" and "≤0.75 L_a" limits 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.
A20	PTS 6.6.7 – The proposed change relocates in CTS 4.4.5.5
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	
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 (see DOD 3), 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 DOC L1) since this initial verification provides the necessary confirmation of fuel oil quality. This is an additional restriction on the unit.
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 RTS 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.
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	Additional appropriate Conditions are included for the control room isolation on high radiation. A statement was added to Actions 17 and 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) if either Action is not met without reverting to Limiting Condition for Operation (LCO) 3.0.3. This is considered a more restrictive change since CTS Table 3.3-6 Actions 17 and 20 do not provide these actions and less time is provided to take the Actions than if TS 3.0.3 were entered.

Technical Changes – More Restrictive	
M5	CTS Table 3.3-6, Action 21 will be included to provide an appropriate condition if the LCO is not met during movement of irradiated fuel assemblies. 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 for during handling of irradiated fuel and thus the proposed change is considered more restrictive since less time is proposed in Action 21 than was allowed by Actions 17 and 20.
M6	CTS 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 M1 and Markup of Inserts). PTS 4.8.1.1, Action f.3 and PTS 4.8.1.2.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, this Action is 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.
M7	PTS6.3.1 will be updated to reflect the latest changes to the Quality 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.
M8	PTS 6.4.d – Requirements will be included to provide procedures for each of the programs identified in PTS 5.5. 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.
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	
L1	CTS 4.8.1.1.2.b will be revised to require the periodic testing of stored fuel for particulates only, replacing the periodic testing per ASTM D975once every 92 days per PTS 6.5.13.c. Refer to M1 for added testing requirements. This change reflects industry standard acceptable diesel generator (DG) fuel oil testing programs reflected in NUREG-1432. Over the storage life of 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 (see DOC M1) 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 DG fuel oil and can be trended to provide increased confidence that the stored DG fuel oil will support SG operability.
L2	It is proposed to add Note 6 to CTS Table 4.3-3. The note provides 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 teat 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?
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 due to a control room boundary inoperability. 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. The proposed change is acceptable because of the low probability of a design basis accident during any given 24 hour period and because entry into the Condition is expected to be very infrequent. The allowance to have the control room boundary open intermittently is acceptable as the administrative controls that must be implemented will ensure that the control room boundary can be rapidly closed when a need for control room isolation is indicated.

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 gallons, 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 3.8.1.2.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 particulates does not mean failure of the fuel oil to burn properly in the diesel engine, and 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 allow for further evaluation, re-sampling, and re-analysis of the diesel generator fuel oil.
L6	PTS 6.2.2.d will allow an individual qualified in radiation protection procedures 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 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 advisory individual.

Technical Changes – Less Restrictive	
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.
L9	CTS 6.9.1.5 defines the requirements for Occupational Exposure Data 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.
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.

Less Restrictive – Administrative Deletion of Requirements	
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.
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. CTS Location — New Location 4.7.6.1.2.a — Bases, SR 4.7.6.1.2.a 4.7.6.1.2.d.2 — Bases, SR 4.7.6.1.2.b 6.9.1.1 — TRM 6.9.1.2 — TRM 6.9.1.3 — TRM

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 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. ANO will no longer report challenges to the LTOP valves. Challenges to either the pressurizer safety valves or LTOP valves that result in a potential impact on safety would be evaluated for reportability under 10 CFR 50.73 and thus reported to the NRC.
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.

In [summary],

Describe associated changes to the Technical Specification Bases, if any.

3.0 BACKGROUND

[ ]

4.0 TECHNICAL ANALYSIS

[ ]

5.0 REGULATORY ANALYSIS

5.1 Applicable Regulatory Requirements/Criteria

The proposed changes have been evaluated to determine whether applicable regulations and requirements continue to be met. [ ]

[Entergy has determined that the proposed changes do not require any exemptions or relief from regulatory requirements, other than the TS, and do not affect conformance with any GDC differently than described in the SAR.]

5.2 No Significant Hazards Consideration

[ ]

[Entergy Operations, Inc. has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:]

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

   Response: No.

   [Explanation/basis for the response.]]

   Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

[Explanation/basis for the response.] |

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

[Explanation/basis for the response.] |

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Entergy concludes that the proposed amendment(s) present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.3 Environmental Considerations

| |

The proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

[and/or]

The proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to record keeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10CFR51.22(c)(10). Therefore, pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 PRECEDENCE

| |

Attachment 2

2CAN0103XX

Proposed Technical Specification Changes (mark-up)

(i) Containment Radiation Monitor

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, 12/1/76.

2.C.(3)(k) Deleted per Amendment 12, 6/12/79 and Amendment No. 31, 5/12/82.

2.C.(3)(l) 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 per Amendment

~~(p) Secondary Water Chemistry Monitoring~~

A3

This will be relocated to proposed TS 6.5.10. See Markup of insert pages.

~~FOI shall implement a secondary water chemistry monitoring program using the overall plant administrative procedure "Steam Generator Water Chemistry Monitoring, Unit II", to minimize steam generator tube degradation. The program shall be defined in specific plant procedures and shall include:~~

~~1. Identification of sampling schedule for the critical parameters and control points for these parameters;~~

~~2. Identification of the procedures used to measure the values of the critical parameters;~~

~~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~~

~~6. 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.~~

A1

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

This will be moved to PTS 6.5.2. See markup of insert pages.

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

A3

~~1. Provisions establishing preventative maintenance and periodic visual inspection requirements, and~~

~~2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.~~

This will be permanently deleted.

2.C.(6) Deleted per Amendment~~EOI shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:~~

A5

~~1. Training of personnel,~~

~~2. Procedures for monitoring, and~~

~~3. Provisions for maintenance of sampling and analysis equipment.~~

2.C.(7) Deleted per Amendment 76, 7/22/86.

(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.

(9) 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

EOI shall fully implement and maintain in effect all provisions of the Commission-approved 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.

A1

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All
A1

ADMINISTRATIVE CONTROLS

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All A1

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 6.6.5~~6.9.5~~. Plant operation within these operating limits is addressed in individual specifications. A1

TABLE 3.3-6

RADIATION MONITORING INSTRUMENTATION

INSTRUMENT	MINIMUM CHANNELS OPERABLE	APPLICABLE MODES	ALARM/TRIP SETPOINT	MEASUREMENT RANGE	ACTION
1. AREA MONITORS					
a. Spent Fuel Pool Area Monitor	1	Note 1	$\leq 1.5 \times 10^{-2}$ R/hr	$10^{-4} - 10^{1}$ R/hr	13
b. Containment High Range	2	1, 2, 3, & 4	Not Applicable	$1 - 10^{7}$ R/hr	18
2. PROCESS MONITORS					
a. Containment Purge and Exhaust Isolation	1	5 & 6	$\leq 2 \times$ background	$10 - 10^{6}$ cpm	16
b. Control Room Ventilation Intake Duct Monitors	2	Note 2	$\leq 2 \times$ background	$10 - 10^{6}$ cpm	17, 20, 21
c. Main Steam Line Radiation Monitors	1/Steam Line	1, 2, 3, & 4	Not Applicable	$10^{-1} - 10^{4}$ mR/hr	19

Note 1 - With fuel in the spent fuel pool or building.
Note 2 - MODES 1, 2, 3, 4, and during handling of irradiated fuel.

The addition of Note 21 to item 2.b and the page format change from landscape to portrait.

All
A1

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.

c. If continuously ventilating, verify the SPING monitor operable or perform the ACTIONS of 3.3.3.9, or secure the containment purge system.

ACTION 17 - In MODE 1, 2, 3, or 4 ~~W~~with no channels OPERABLE, within 1 hour initiate and maintain operation of the control room emergency ventilation system (CREVS) in the recirculation mode of operation or be in HOT STANDBY within the next 6 hours and COLD SHUTDOWN in the following 30 hours. M5 A1 M4

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 NRC ~~Commission pursuant to Specification 6.9.2~~ 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. A6

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:

1) 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 Specification 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. A6

ACTION 20 - In MODE 1, 2, 3, or 4 ~~W~~with 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. M5 M3 M4

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. M5

TABLE 4.3-3

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	MODES IN WHICH SURVEILLANCE REQUIRED
1. AREA MONITORS				
a. Spent Fuel Pool Area Monitor	S	R	M	Note 1
b. Containment High Range	S	R Note 4	M	1, 2, 3, & 4
2. PROCESS MONITORS				
a. Containment Purge and Exhaust Isolation	Note 2	R	Note 3	5 & 6
b. Control Room Ventilation Intake Duct Monitors	S	R	M Note 6	Note 5
c. Main Steam Line Radiation Monitors	S	R	M	1, 2, 3, & 4

Note 1 - With fuel in the spent fuel pool or building.
Note 2 - Within 8 hours prior to initiating containment purge operations and at least once per 12 hours during containment purge operations.
Note 3 - Within 31 days prior to initiating containment purge operations and at least once per 31 days during containment purge operations.
Note 4 - Acceptable criteria for calibration are provided in Table II.F.1-3 of NUREG-0737.
Note 5 - MODES 1, 2, 3, 4, and during handling of irradiated fuel.
Note 6 - When the Control Room Ventilation Intake Duct Monitor is placed in an inoperable status solely for performance of this Surveillance, entry into associated Actions may be delayed up to 3 hours.

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Page format change from landscape to portrait is A1.

TABLE 3.3-10

POST-ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT		MINIMUM CHANNELS OPERABLE	ACTION
1.	Containment Pressure (Normal Design Range)In	2	1
2.	Containment Pressure (High Range)	2	2
3.	Pressurizer Pressure	2	1
4.	Pressurizer Water Level	2	1
5.	Steam Generator Pressure	2/steam generator	1
6.	Steam Generator Water Level	2/steam generator	1
7.	Refueling Water Tank Water Level	2	1
8.	Containment Water Level - Wide Range	2	2
9.	Emergency Feedwater Flow Rate	1/steam generator	1
10.	Reactor Coolant System Subcooling Margin Monitor	1	1
11.	Pressurizer Safety Valve Acoustic Position Indication	1/Valve	1
12.	Pressurizer Safety Valve Tail Pipe Temperature	1/Valve	1

This page is included as a format change only – landscape to portrait. A1

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

INSTRUMENT	MINIMUM CHANNELS OPERABLE	ACTION
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 ~~pursuant to specification 6.9.2~~ shall be submitted to the NRC 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. A6

Action 4: With the number of OPERABLE channels two less than the minimum channels required to be OPERABLE:

a. If repairs are feasible, 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 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. A6

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

~~4.4.5.0~~4.4.5 Each steam generator shall be demonstrated OPERABLE in accordance with the Steam Generator Tube Surveillance Program ~~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).~~

~~4.4.5.1 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 4.4-1.~~

~~4.4.5.2 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 4.4-2. The inservice inspection of steam generator tubes shall be performed at the frequencies specified in specification 4.4.5.3 and the inspected tubes shall be verified acceptable per the acceptance criteria of Specification 4.4.5.4. 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.~~

~~b. The first sample of tubes selected 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.

SURVEILLANCE REQUIREMENTS (Continued)

1. All nonplugged tubes that previously had detectable wall penetrations (>20%).

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

3. A tube inspection (pursuant to Specification 4.4.5.4.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.

c. The tubes selected as the second and third samples (if required by Table 4.4-2) 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 tubes where imperfections were previously found.

The result of each sample inspection shall be classified into one to 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 defective, or between 5% and 10% of the total tubes inspected are degraded tubes.
C-3	More than 10% of the total tubes inspected 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.

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SURVEILLANCE REQUIREMENTS (Continued)

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

a. 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.

b. If the results of the inservice inspection of a steam generator conducted in accordance with Table 4.4-2 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.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 4.4-2 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 break.

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SURVEILLANCE REQUIREMENTS (Continued)

4.4.5.4 Acceptance Criteria

a. As used in this Specification

1. Tubing or Tube means that portion of the tube which forms the primary system to secondary system pressure boundary.

2. Imperfection means an exception to the dimensions, finish or contour of a tube from that required by fabrication drawings or specifications. Eddy-current testing indications below 20% of the nominal tube wall thickness, if detectable, may be considered as imperfections.

3. Degradation means a service-induced cracking, wastage, wear or general corrosion occurring on either inside or outside of a tube.

4. Degraded Tube means a tube containing imperfections ≥20% of nominal wall thickness caused by degradation.

5. % Degradation means the percentage of the tube wall thickness affected or removed by degradation.

6. Defect means an imperfection of such severity that it exceeds the plugging limit. A tube containing a defect is defective.

7. Plugging Limit 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. Unserviceable 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.c, above.

9. Tube Inspection means an inspection of the steam generator tube from tube end (cold leg side) to tube end (hot leg side).

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SURVEILLANCE REQUIREMENTS (Continued)

Moved to PTS 6.5.9. See markup of inserts.

10. Preservice Inspection 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.

b. 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 4.4-2.

4.4.5.5 Reports

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.

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 as denoted by Table 4.4-2. 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 investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence.

Moved to PTS 6.6.7. See markup of inserts.

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~~TABLE 4.4-1~~

~~MINIMUM NUMBER OF STEAM GENERATORS TO BE INSPECTED DURING INSERVICE INSPECTION~~

~~Preservice Inspection~~ ~~Yes~~
~~No. of Steam Generators per Unit~~ ~~Two~~
~~First Inservice Inspection~~ ~~One~~
~~Second & Subsequent Inservice Inspections~~ ~~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~~

~~STEAM GENERATOR TUBE INSPECTION~~

1ST SAMPLE INSPECTION			2ND SAMPLE INSPECTION		3RD SAMPLE INSPECTION	
Sample Size	Result	Action Required	Result	Action Required	Result	Action Required
A minimum of S Tubes per S.G.	C-1	None	N/A	N/A	N/A	N/A
	C-2	Plug defective tubes and inspect additional 2S tubes in this S.G.	C-1	None	N/A	N/A
			C-2	Plug defective tubes and inspect additional 4S tubes in this S.G.	C-1	None
					C-2	Plug defective tubes
					C-3	Perform action for C-3 result of first sample
			C-3	Perform action for C-3 result of first sample	N/A	N/A
	C-3	Inspect all tubes in this S.G., plug defective tubes and inspect 2S tubes in the other S.G. Special Report to NRC per Specification 6.9.2	Other S.G. is C-1	None	N/A	N/A
			Other S.G. is C-2	Perform action for C-2 result of second sample	N/A	N/A
			Other S.G. is C-3	Inspect all tubes in the other S.G. and plug defective tubes. Special Report to NRC per Spec. 6.9.2	N/A	N/A

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

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

EMERGENCY CORE COOLING SYSTEMS

ECCS SUBSYSTEMS - $T_{avg} \geq 300°F$

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 inoperable 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 injects 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 actuation and the total accumulated actuation cycles to date. A6

SURVEILLANCE REQUIREMENTS

4.5.2 Each ECCS subsystem shall be demonstrated OPERABLE:

a. 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.

EMERGENCY CORE COOLING SYSTEMS

ECCS SUBSYSTEMS - $T_{avg} \leq 300°F$

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 ~~to the Commission pursuant to Specification 6.9.2~~ to the NRC within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date. A6

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.

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 isolation valves shall be demonstrated OPERABLE as specified in the Containment Leakage Rate Testing Program.

~~Prior to exceeding conditions which require establishment 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 acceptable limits per TS 4.6.1.2, unless the test has been successfully completed within the last three months.~~

A1

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

PLANT SYSTEMS

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) A1

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 control room emergency ventilation systems inoperable due to an inoperable control room boundary, restore the control room boundary 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. L3

e. With two control room emergency ventilation systems inoperable for reasons other than action d or two control room emergency air conditioning systems inoperable, enter Specification 3.0.3. A7

During Handling of Irradiated Fuel

~~d~~f. 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. A1

~~e~~g. 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. A1

Note 1: The control room boundary may be opened intermittently under administrative controls. L3

f. With one control room emergency air conditioning system and one control room emergency ventilation system inoperable:

1. 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

2. restore the inoperable control room emergency air conditioning system to OPERABLE status within 30 days or immediately place the OPERABLE system in operation;

3. otherwise, suspend all activities involving the handling of irradiated fuel.

4. The provisions of Specification 3.0.4 are not applicable.

Moved to new page 3/4 7-17a as h. and i. due to addition of new d. & e.

g. With both control room emergency air conditioning systems or both control room emergency ventilation systems inoperable, immediately suspend all activities involving the handling of irradiated fuel.

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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,

1. 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

2. restore the inoperable control room emergency air conditioning system to OPERABLE status within 30 days or immediately place the OPERABLE system in operation;

3. otherwise, suspend all activities involving the handling of irradiated fuel.

4. The provisions of Specification 3.0.4 are not applicable

i. With both control room emergency air conditioning systems or both control room emergency ventilation systems inoperable, immediately suspend all activities involving the handling of irradiated fuel.

All A1

SURVEILLANCE REQUIREMENTS ~~(Continued)~~ A1

4.7.6.1.1 Each control room emergency air conditioning system shall be demonstrated OPERABLE:

a. 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 ≤ 84°F D.B.

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:

a. At least once per 31 days ~~on a STAGGERED TEST BASIS 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. LA2

~~b. At least once per 18 months and 1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or 2) following painting, fire or chemical release in any ventilation zone or communicating with the system by:~~

~~1. Verifying that the cleanup system satisfies the in-place testing acceptance criteria and uses the test 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 rate is 9900 cfm ± 10%.~~

~~2. Verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, 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:~~

~~a. ≤ 2.5% for 2 inch charcoal adsorber beds, or~~

~~b. ≤ 0.5% for 4 inch charcoal adsorber beds.~~

~~3. Verifying system flow rate of 2000 cfm ± 10% during system operation when tested in accordance with ANSI N510-1975.~~

~~c. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b of Regulatory Guide 1.52, 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:~~

~~1. ≤ 2.5% for 2 inch charcoal adsorber beds, or~~

~~2. ≤ 0.5% for 4 inch charcoal adsorber beds.~~

See insert markup of SR 4.7.6.1.2.b and c.

~~d.~~ b. At least once per 18 months by verifying that on a ~~control room high radiation~~ test signal either actual or simulated, the system automatically isolates the control room ~~within 10 seconds and~~ switches into a recirculation mode of operation ~~with flow through the HEPA filters and charcoal adsorber banks.~~ A1 LA2

c. By performing the required Control Room Emergency Ventilation filter testing in accordance with the Ventilation Filter Testing Program (VFTP). A6

SURVEILLANCE REQUIREMENTS (continued)

d. At least once per 18 months by:

1. Verifying that the pressure drop across the combined HEPA filters and charcoal 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 automatically isolates the control room within 10 seconds and switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks.

e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove ≥ 99.95% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 2000 cfm ± 10%.

f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove ≥ 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 2000 cfm ±10%.

d.1, e. and f. will be relocated to the VFTP, proposed TS 6.5.11, with minor changes noted. See markup of insert.

d.2 will be moved to new 4.7.6.1.2.b

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. Preservice Testing of Repaired, Replacement and New Snubbers

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 criteria 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;

2) 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;

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

h. 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~~.

A9

PLANT SYSTEMS

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.

APPLICABILITY: 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 Commission pursuant to Specification 6.9.2~~ to the NRC within 30 days of a determination of such non-conformity.

A6

b. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.12.1 Inspection Frequencies - The structural integrity of the spent fuel pool shall be determined per the acceptance criteria 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.

b. 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 struts 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.).

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),

2. 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

2. 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.

~~b. With one diesel generator of the above required A.C. electrical power source inoperable, perform the following:~~

~~1. Demonstrate the OPERABILITY of both the offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter, and~~

~~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~~

A1

~~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~~

~~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.~~

A1

~~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.~~

LIMITING CONDITION FOR OPERATION (Continued)

b. With one diesel generator of the above required A.C. electrical power source inoperable, perform the following:

1. Demonstrate the OPERABILITY of both the offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter, and

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 A1

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.

A1

A1

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 diesel 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

4. 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.

~~e. With two diesel generators of the above required A.C. electrical power sources inoperable, perform the following:~~

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~~1. Demonstrate the OPERABILITY of the two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter, and~~

~~2. Restore one of the inoperable diesel generators to OPERABLE status within 2 hours or be in a least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours, and~~

~~3. Restore both diesel generators 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.~~

A1

Action e will be moved to page 3/4 8-2a.

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 within 1 hour and at least once per 8 hours thereafter, and

2. Restore one of the inoperable diesel generators to OPERABLE status within 2 hours or be in a least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours, and

3. Restore both diesel generators 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.

f. With the volume of the separate fuel storage system outside the limits of action f.1 or the new or stored fuel oil properties outside the limits of the Diesel Fuel Oil Testing Program, perform the following as appropriate. (Note 2)

1. If one or more fuel storage tanks contain less than 22,500 gallons and greater than 17, 446 gallons, restore the fuel oil volume to within limits within 48 hours.

2. If the stored fuel oil total particulates are not within limits for one or more diesel generators, restore fuel oil total particulates to within limits within 7 days.

3. If new fuel oil properties are not within limits for one or more diesel generators, restore stored fuel oil properties to within limits within 30 days.

4. If action f.1 is not met within the allowable outage time or is outside the allowable limits, or if action f.2 or f.3 is not met within the allowable outage time, then immediately declare the associated diesel generator inoperable and perform the appropriate action.

Note 2 Separate condition entry is allowed for each diesel generator.

~~4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall 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 shutdown by transferring (manually and automatically) unit power supply from the normal circuit to the alternate circuit.~~

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.

A1 A1 A1 A1 L4 L5 M6 A10 A1 A1

~~4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE: (Note 1)~~

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

~~1. Verifying the fuel level in the day fuel tank.~~

~~2. Verifying 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. Verifying the diesel starts from a standby condition and accelerates to at least 900 rpm in ≤ 15 seconds. (Note 2)~~

~~5. Verifying the generator is synchronized, loaded to an indicated 2600 to 2850 Kw and operates for ≥ 60 minutes. (Notes 3 & 4)~~

~~6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.~~

~~b. At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank 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.~~

All A1

~~Note 1~~
~~All planned diesel generator starts for the purposes of these surveil- lances may be preceded by prelube procedures.~~

~~Note 2~~
~~This diesel generator start from a standby condition in ≤ 15 sec. shall be accomplished at least once every 184 days. All other diesel generator starts for this surveillance may be in accordance with vendor recommendations.~~

~~Note 3~~
~~Diesel generator loading may be accomplished in accordance with vendor recommendations such as gradual loading.~~

~~Note 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.~~

ELECTRICAL POWER SYSTEMS

A.C. SOURCES

SURVEILLANCE REQUIREMENTS

A1

4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:

A1

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 shutdown by transferring (manually and automatically) unit power supply from the normal circuit to the alternate circuit.

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE: (Note 1)

A1

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

1. Verifying the fuel level in the day fuel tank.

2. Verifying 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. Verifying the diesel starts from a standby condition and accelerates to at least 900 rpm in ≤ 15 seconds. (Note 2)

5. Verifying the generator is synchronized, loaded to an indicated 2600 to 2850 Kw and operates for ≥ 60 minutes. (Notes 3 & 4)

6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.

LA1

b. ~~At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank 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.~~ Verify fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of, the Diesel Fuel Oil Testing Program.

Note 1 All planned diesel generator starts for the purposes of these surveillances may be preceded by prelube procedures.

A1

Note 2 This diesel generator start from a standby condition in ≤ 15 sec. shall be accomplished at least once every 184 days. All other diesel generator starts for this surveillance may be in accordance with vendor recommendations.

A1

Note 3 Diesel generator loading may be accomplished in accordance with vendor recommendations such as gradual loading.

A1

Note 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.

A1

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 gallons of fuel (equivalent to 100% of total tank volume), and

3. A fuel transfer pump.

APPLICABILITY: MODES 5 and 6.

ACTION:

a. With less than the above minimum required A.C. electrical power sources OPERABLE, suspend all operations involving CORE ALTERATIONS or positive reactivity changes. A1

b. With the volume of the fuel storage system outside the limits of action b.1 or the new or stored fuel oil properties outside the limits of the Diesel Fuel Oil Testing Program, perform the following as appropriate: A1

1. If the required diesel generator associated fuel storage tank contains less than 22,500 gallons and greater than 17, 446 gallons, restore the fuel oil volume to within limits within 48 hours. L4

2. If the stored fuel oil total particulates are not within limits for the required diesel generator, restore fuel oil total particulates to within limits within 7 days. L5

3. If new fuel oil properties are not within limits for the one required diesel generator, restore stored fuel oil properties to within limits within 30 days. M6

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. A10

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.

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 filter testing in accordance with the Ventilation Filter Testing Program (VFTP).

A1

~~a. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:~~

~~1. Verifying that the ventilation system satisfies the inplace testing acceptance criteria and uses the test 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 rate is 38,700 cfm ± 10%.~~

See markup of inserts for changes.

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 1978, shows the methyl iodide penetration less than 5.0% when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and a relative humidity of 95%.

3. Verifying a system flow rate of 39,700 cfm ± 10% during system operation when tested in accordance with ANSI N510-1975.

b. After every 720 hours of charcoal adsorber operation by verifying within 31 days after removal that a laboratory analysis of a representative carbon sample obtained in accordance with Regulatory Position C.6.b. of Regulatory Guide 1.52, Revision 2, March 1978, shows the methyl iodide penetration less than 5.0% when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and a relative humidity of 95%.

c. At least once per 18 months by verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is < 6 inches Water Gauge while operating the system at a flow rate of 39,700 cfm ± 10%.

d. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove ≥ 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 39,700 cfm ± 10%.

e. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove ≥ 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the system at a flow rate of 39,700 cfm ± 10%.

See markup of inserts for changes.

6.1 RESPONSIBILITY

A13

6.1.1 The ~~ANO-2 p~~Plant ~~m~~Manager ~~ANO Operations~~ shall be responsible for overall unit operations and shall delegate in writing the succession to this responsibility during his absence. A1

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, 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. A1

6.2 ORGANIZATION

6.2.1 ONSITE AND OFFSITE ~~AND ONSITE~~ ORGANIZATIONS A1

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 ~~plant~~unit. A1

a. Lines of authority, responsibility, and communication shall be defined and established ~~and defined for the~~throughout highest management levels, ~~through~~ intermediate levels, ~~to and including~~ 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). A1

A13

b. The ~~ANO-2 plant~~ Plant ~~m~~Manager 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 ~~plant~~unit. A1

c. A specified corporate executive shall have corporate responsibility for overall ~~plant~~ unit nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the ~~plant~~ unit to ensure nuclear safety. The specified corporate executive shall be documented in the SAR; ~~and~~ A1 A1

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

d. 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~~ they individuals shall have sufficient organizational freedom to ensure their independence from operating pressures. A1

6.2.2 UNIT STAFF

a. ~~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. A11 A12

b. ~~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)(2)(i) for one unit, one control room. A11

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.c for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements. A11 L8

d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position. L6

e. ~~All CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.~~ A11

f.g. In MODES 1, 2, 3, or 4, an individual shall provide advisory technical support for the ~~unit~~ operations shift ~~supervisor~~ crew in the areas of thermal hydraulics, reactor engineering, and plant analysis 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. L7 A1

g.e. ~~Administrative control shall be established to limit~~ The amount of overtime worked by ~~plant~~ unit staff members performing safety-related functions ~~These administrative controls~~ shall be limited and controlled in accordance with the guidance provided by the NRC Policy Statement on working hours (Generic Letter No. 82-12). A1 A1

h.f. The operations manager or the assistant operations manager shall hold a ~~senior reactor operator~~ SRO license. A1

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A1

~~TABLE 6.2-1~~

~~MINIMUM SHIFT CREW COMPOSITION#~~

A11

~~LICENSE CATEGORY~~	~~APPLICABLE MODES~~	
	~~1, 2, 3, & 4~~	~~5 & 6~~
~~SOL~~	~~2~~	~~1*~~
~~OL~~	~~2~~	~~1~~
~~Non-Licensed~~	~~3~~	~~1~~

A12

~~*Does not include the licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling, supervising CORE ALTERATIONS.~~

~~#Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1.~~

Moved to 6.2.2.c. See 6.2.2.c for classification of changes.

6.3 UNIT STAFF QUALIFICATIONS

M7

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

A1

6.4 ~~DELETED~~PROCEDURES

Subsections are later in markup.

A1

6.5 PROGRAMS

A1

CTS 6.14 will be relocated here – see markup later.

~~[6.5.1 through 6.5.6 will be used later.]~~

6.5.1 Offsite Dose Calculation Manual (ODCM)

Insert 2)

6.5.2 Primary Coolant Sources Outside Containment

6.5.3 not used

CTS 6.8.4.a will be relocated here – see markup later.

6.5.4 Radioactive Effluent Controls Program

CTS 6.8.4.b will be relocated here – see markup later.

6.5.5 Component Cyclic or Transient Limit Program

6.5.6 not used

6.5.7 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendation of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, August 1975. The volumetric examination per Regulatory Position C.4.b.1 will be performed on approximately 10-year intervals.

6.5.8 Inservice Testing Program

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

New Pages will be added as needed.

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

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing activities	Required frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Every 6 weeks	At least once per 42 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice testing activities.

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.

6.5.9 Steam Generator (SG) Tube Surveillance Program

Insert 3

Insert 1)

6.5.10 Secondary Water Chemistry

6.5.11 Ventilation Filter Testing Program (VFTP)

Insert 5)

All A1

6.5.12 later

Insert 4)

6.5.13 Diesel Fuel Oil Testing Program

TS Bases Control Program is on page 6-12a.

6.5.14 Technical Specifications (TS) Bases Control Program

6.5.15 not used

6.5.16 Containment Leakage Rate Testing Program

CTS 6.15 will be relocated here – see markup later

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

2. 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).

~~6.6 DELETED~~

A1

~~6.7 SAFETY LIMIT VIOLATION~~

~~6.7.1 The following actions shall be taken in the event a Safety Limit is violated:~~ A14

~~a. The unit shall be placed in at least HOT STANDBY within one hour.~~

~~b. The Vice President, Operations ANO and the SRC shall be notified within 24 hours.~~ A15

~~c. The Nuclear Regulatory Commission shall be notified pursuant to 10CFR50.72 and a report submitted pursuant to the requirements of 10CFR50.36 and Specification 6.6.~~ A11

6.~~8~~4 PROCEDURES ~~AND PROGRAMS~~ A1

6.~~8~~4.1 Written procedures shall be established, implemented, and maintained covering the following activities ~~referenced below:~~ A1

a. ~~a.~~ The applicable procedures recommended in ~~Appendix "A" of~~ Regulatory Guide 1.33, Revision 2, Appendix A, February 1978; A1

b. The emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Section 7.1 of Generic Letter 82-33. M9

~~b. Refueling operations.~~

~~c. Surveillance and test activities of safety related equipment.~~ A1

~~d. (Deleted)~~

~~e. (Deleted)~~ A1

~~f~~c. Fire Protection Program implementation; and

d. All programs specified in Specification 6.5; and M8

~~g~~e. Modification of ~~c~~Core ~~p~~Protection ~~c~~Calculator (CPC) ~~a~~Addressable ~~c~~Constants. These procedures ~~should~~ shall include provisions to ~~assure~~ ensure that sufficient margin is maintained in CPC ~~T~~type I addressable constants to avoid excessive operator interaction with the CPCs during reactor operation. A1

~~NOTE~~: Modifications to the CPC software (including changes of algorithms and fuel cycle specific data) shall be performed in accordance with the most recent version of "CPC Protection Algorithm Software Change Procedure," CEN-39(A)-P, which ~~that~~ has been determined to be applicable to the facility. Additions or deletions to CPC addressable constants or changes to addressable constant software limit values shall not be implemented without prior NRC approval. A1 A1

~~h. New and spent fuel storage.~~

~~i. ODCM and PCP implementation.~~ A1

~~6.8.2 Deleted~~

~~6.8.3 Deleted~~

6.5 Programs and Manuals

All
A1

~~6.8.4~~ The following programs shall be established, implemented, and maintained:

~~a.~~ 6.5.4 Radioactive Effluent Controls Program

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:

~~1)~~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)~~b. 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)~~d. Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS, conforming to 10 CFR 50, Appendix I;

~~5)~~e. Determination of cumulative ~~and projected~~ dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days; Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days.

~~6)~~f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;

~~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;

8)h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; A1

9)i. Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and A1

10)j. Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC beyond the site boundary due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190. A1

The provisions of SR 4.0.2 and SR 4.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency. A16

b. 6.5.5 Component Cyclic or Transient Limit Program A1

This program provides controls to track the SAR Section 5.2.1.5, cyclic or and transient occurrences to ensure that components are maintained within the design limits. A1

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 reports shall be submitted to the Administrator of the Regional Office unless otherwise noted. A11

STARTUP REPORT LA2

6.9.1.1 A summary 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 or 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.

~~ANNUAL REPORTS~~

A17

~~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:~~

A1

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.~~ A tabulation on an annual basis ~~for~~ of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose ~~exposures~~ equivalent greater than 100 mrem/yrs and their associated collective deep dose equivalent (reported in person-rem) ~~exposure~~ according to work and job functions,[#] (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 assignment to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter ~~(~~TLD~~)~~, electronic dosimeter, or film badge measurements. Small exposures totaling 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 should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

A18

A18

L9

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

A20

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.

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 R~~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.

LA3

~~c. Documentation of all challenges to the pressurizer safety valves.~~

~~d. Deleted~~ A1

A1 e. 6.6.8 The results of specific activity analysis in which the primary coolant 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

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~~1/ A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.~~ A1

~~2/ This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.~~ A18

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.

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. A1

~~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:~~ A11

~~a. ECCS Actuation, Specifications 3.5.2 and 3.5.3.~~ See individual specifications.

~~b. Deleted~~

~~c. Deleted~~

~~d. Deleted~~ A1

~~e. Deleted~~

~~f. Deleted~~

~~g. Deleted~~

h. Deleted A1

i. Inoperable Containment Radiation Monitors, Specification 3.3.3.1.

j. Steam Generator Tubing Surveillance – Category C-3 Re[illegible] Specification 4.4.5.5.

k. Maintenance of Spent Fuel Pool Structural Integri[illegible] Specification 3.7.12.

l. Deleted A1

m. Deleted

n. Inoperable Reactor Vessel Level Monitoring Sys[illegible] (RVLMS), Specification 3.3.3.6, Table 3.3-10 Ite[illegible] 14.

o. Inoperable Main Steam[illegible] Radiation Mo[illegible]rs, Specification 3.3.3.1, Table 3.3-6.

See individual specifications for i., j., k., n., and o.

6.6.3 RADIOACTIVE EFFLUENT RELEASE REPORT *

~~6.9.3~~ The Radioactive Effluent Release Report covering the operation of the unit in the 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.

* ~~(~~Note: A single submittal may be made for ANO. The submittal ~~should~~ shall combine ~~those~~ sections that are common to both units. The submittal shall specify the releases of radioactive material from each unit.~~)~~

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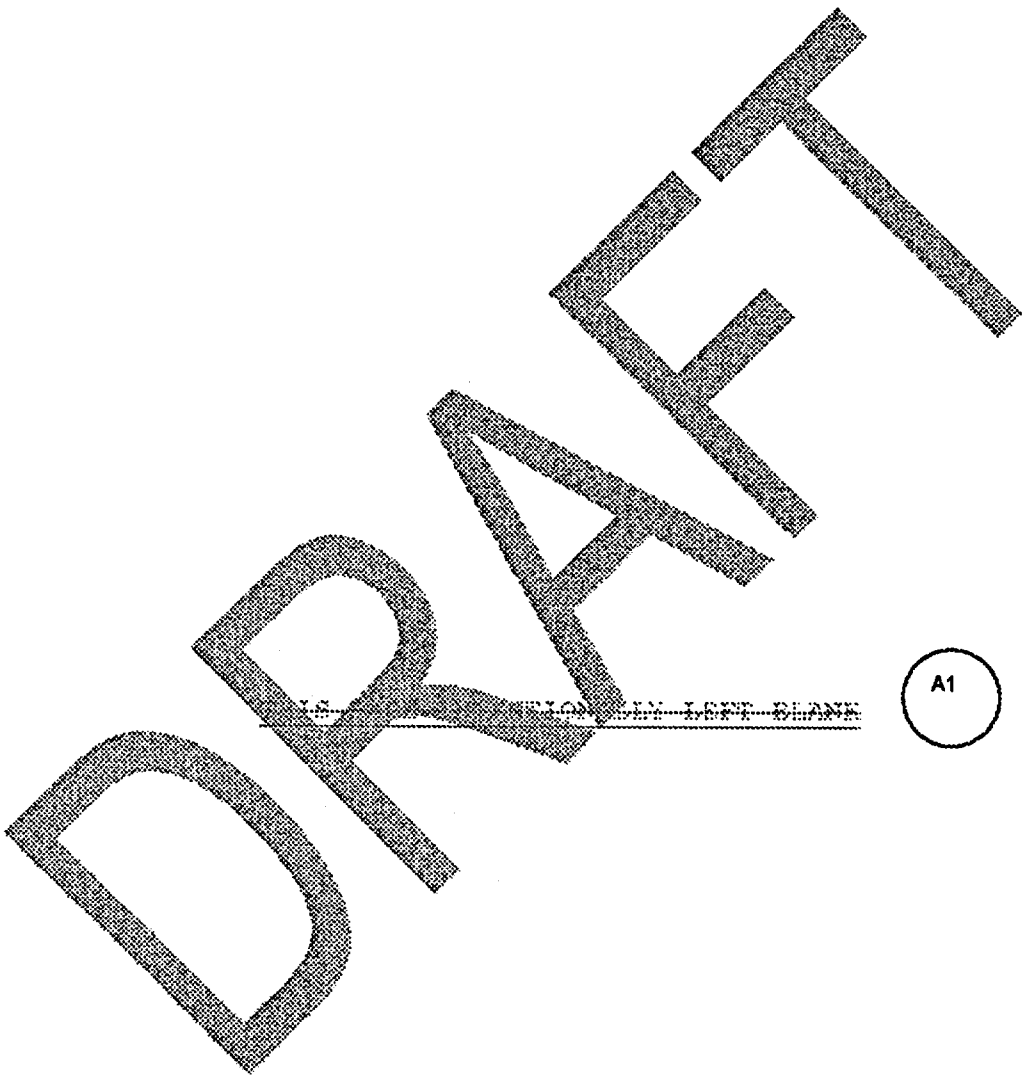
A21

A21

A1

Move note up on this line.


DRAFT
A1

6.6.2 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT *

~~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.

* ~~(~~Note: A single submittal may be made for ANO. The submittal should combine ~~those sections that are~~ common to both units.~~)~~

Move note up.

All
A1

All
A1

6.6.5 CORE OPERATING LIMITS REPORT (COLR)

~~6.6.5~~ a. ~~The core~~Core operating limits shall be established prior to each reload cycle, or prior to any remaining part of a reload cycle, and shall be documented in the CORE OPERATING LIMITS REPORT for the following ~~prior to each reload cycle or any remaining part of a reload cycle~~:

3.1.1.1	Shutdown Margin-T_{avg} > 200°F
3.1.1.2	Shutdown Margin-T_{avg} ≤ 200°F
3.1.1.4	Moderator Temperature Coefficient
3.1.3.1	CEA Position
3.1.3.6	Regulating And Group P CEA Insertion Limits
3.2.1	Linear Heat Rate
3.2.3	Azimuthal Power -T_q
3.2.4	DNBR Margin
3.2.7	Axial Shape Index

~~6.6.5.1~~ b. 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).

3) "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).

4) "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).

Additional pages will be added as needed when clean pages are created.

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).

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).

6.6.5 CORE OPERATING LIMITS REPORT (COLR) (Continued)

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).

11) "CESEC-Digital Simulation of a Combustion Engineering Nuclear Steam 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, 3.1.3.1 for CEA Position, 3.1.3.6 for Regulating CEA and Group P Insertion Limits, and 3.2.4.b for DNBR Margin).

12) "Technical Manual for the CENTS Code," CENPD 282-P-A, February 1991 (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, 3.1.3.6 for Regulating and Group P Insertion Limits, and 3.2.4.b for DNBR Margin.

13) Letter: O.D. Parr (NRC) to F.M. Stern (CE), dated June 13, 1975 (NRC Staff Review of the Combustion Engineering ECCS Evaluation Model). NRC approval for ~~6.9.5.1.4~~6.6.5.4), ~~6.9.5.1.5~~6.6.5.5), and ~~6.9.5.1.8~~6.6.5.8) methodologies.

14) Letter: O.D. Parr (NRC) to A.E. Scherer (CE), dated December 9, 1975 (NRC Staff Review of the Proposed Combustion Engineering ECCS Evaluation Model changes). NRC approval for ~~6.9.5.1.6~~6.6.5.6) methodology.

15) 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&L), "CESEC Code Verification." NRC approval for ~~6.9.5.1~~6.6.5.11) methodology.

17) "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, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI).

~~6.9.5.2~~ c. The core operating limits shall be determined so that all applicable limits (e.g. fuel thermal-mechanical limits, core thermal-hydraulic limits, Emergency Core Cooling System (ECCS) limits, nuclear limits such as ~~shutdown margin~~SDM, ~~and~~ transient analysis limits, and accident analysis limits) of the safety analysis are met.

~~6.9.5.3~~ d. The ~~CORE OPERATING LIMITS REPORT~~COLR, 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.

A11

~~6.19 DELETED~~ A1

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~~6.11 RADIATION PROTECTION PROGRAM~~

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

~~6.12 (DELETED)~~

See PTS 6.4.d.

~~6.12.2 (DELETED)~~ A1

~~6.13.6~~ 6.13.7 HIGH RADIATION AREA

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

~~b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them.~~ A1

~~c. 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.~~ A1

~~6.13.2 The requirements of 6.13.1, above, shall also apply to each high radiation area in which the intensity of radiation is greater than 1000 mrem/hr. In addition, locked doors shall be provided to prevent unauthorized entry into such areas and access to these areas shall be maintained under the administrative control of the shift supervisor on duty and/or the designated radiation protection manager.~~ A1

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

6.7 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 A1

a. Each entryway 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. A1

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 L10

c. 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 L10

duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

d. Each individual or group entering such an area shall possess:

1. A radiation monitoring device that continuously displays radiation dose rates in the area; or

2. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate reset setpoint, or

3. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or

4. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

(i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area, who is responsible for controlling personnel exposure within the area, or

(ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.

e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted persons will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

6.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation

a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and, in addition:

1. All such door and gate keys shall be maintained under the administrative control of the shift manager, radiation protection manager, or his or her designee. A1

2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit. A1

b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures. A1 L10

c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

d. Each individual or group entering such an area shall possess: A1

1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or A1

2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or L10

3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and L10

(i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area, who is responsible for controlling personnel exposure within the area, or L10

(ii) Be under the surveillance as specified in the RWP or equivalent, while in the area by means of closed circuit television, of personnel qualified in radiation protection procedures responsible for controlling personnel radiation exposure in the area and with the means to communicate with individuals in the area who are covered by such surveillance. L10

4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As Is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area. L10

e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

L10

f. Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.

L10

6.5 PROGRAMS AND MANUALS

All A1 except as noted.

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

~~6.14~~6.5.1 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 Annual Radiological Environmental Operating and Radioactive Effluent Release ~~and Annual Radiological Environmental Operating~~ Reports ~~required by Specification 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:

1. ~~s~~Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and

2. ~~a~~A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;

b. Shall become effective after approval of the ~~Plant Operations~~ NO General Manager~~;~~ and LA4

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 effective. 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.

All A1 except as noted.

6.15~~6~~.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 establishment 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 acceptable limits per TS 4.6.1.2, unless the test has been successfully completed within the last three months~~ leakage rate tested prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days.

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

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

Leakage rate acceptance criteria are:

a. Containment leakage rate acceptance criteria is $\leq 1.0\ L_a$. During the first unit startup following each test 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. A19

b. Air lock acceptance criteria are:

   1. Overall air lock leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$.

   2. Leakage rate for each door is $\leq 0.01\ L_a$ when pressurized to ≥ 10 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.

Attachment 3

2CAN0103XX

Changes to Technical Specification Bases Pages
For Information Only

DRAFT

Attachment 4

2CAN0103XX

List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE-TIME ACTION	CONTINUING COMPLIANCE	