P.O. Box 63
Lycoming, New York 13093

Constellation Energy Group

Nine Mile Point
Nuclear Station

March 24, 2003
NMP1L 1722

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

SUBJECT: Nine Mile Point Unit 1
Docket No. 50-220
License No. DPR-63
TAC No. MB6421

Response to Request for Additional Information Concerning Amendment Application Regarding Missed Surveillances Using the Consolidated Line Item Improvement Process

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, Nine Mile Point Nuclear Station, LLC (NMPNS) is supplementing the request for an amendment to the Technical Specifications (TSs) for Nine Mile Point Unit 1 that would add TS requirements for missed surveillances.

The initial request for amendment, submitted on October 7, 2002 (NMP1L 1693), conformed with the model application for amendment published in the *Federal Register* on September 28, 2001 (66 FR 49714). The NRC staff issued a request for additional information (RAI) on January 23, 2003, which discussed the need for supplemental information that was not included in the model application.

Attachment 1 provides the NMPNS response to the RAI and an analysis of the supplemental TS changes proposed in response to the RAI. Attachment 2 provides new and existing TS pages marked up to show the proposed changes, along with new TS Bases pages marked up to show the proposed changes (for information only). Attachment 2 contains both the changes initially proposed concerning missed surveillances and the supplemental changes proposed in response to the RAI.

NMPNS requests approval of the proposed license amendment by May 30, 2003. Once approved, the amendment will be implemented within 90 days.

A001

The supplemental changes have been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that the changes involve no significant hazards considerations.

Pursuant to 10 CFR 50.91(b)(1), NMPNS has provided a copy of this license amendment request and the associated analyses regarding no significant hazards considerations to the appropriate state representative.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 24, 2003.

Very truly yours,

John T. Conway
Vice President Nine Mile Point

JTC/JJD/jm
Attachments

cc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR (2 copies)
Mr. John P. Spath, NYSERDA

ATTACHMENT 1

NINE MILE POINT NUCLEAR STATION, LLC

LICENSE NO. DPR-63

DOCKET NO. 50-220

Response to Request for Additional Information

REQUEST FOR ADDITIONAL INFORMATION

The NRC staff issued a request for additional information (RAI) on January 23, 2003, related to the Nine Mile Point Unit 1 (NMP1) application for an amendment concerning missed surveillances under the Consolidated Line Item Improvement Process. The RAI stated:

> "The change to the Standard Technical Specification (STS) Surveillance Requirement (SR) 3.0.3 that provides flexibility to entering a TS Required Actions based upon a risk evaluation was approved in the Consolidated Line Item Improvement Process (CLIIP) change known as Technical Specifications Task Force (TSTF)-358, Revision 6. CLIIP and TSTF changes are based upon the STS, and licensees who adopt those changes must either employ the STS, or their custom TS must be equivalent to the STS in the area of the change.
>
> SR 3.0.3 addresses the situation of a missed surveillance, a surveillance that was not performed within its required frequency, and the resulting implications for considering the surveillance and associated limiting condition for operation not met. To accurately adopt and implement TSTF-358, Revision 6, the custom TSs must have or must establish identical requirements for what it means to meet an SR. STS SR 3.0.1 establishes those requirements. Accordingly for a licensee with custom TSs to adopt TSTF-358, Revision 6, it must do either of the following:
>
> (1) Adopt STS SR 3.0.1 and associated bases, or
>
> (2) Show that its custom TSs have equivalent requirements to SR 3.0.1, and adopt the STS SR 3.0.1 Bases.
>
> There are four sentences in STS SR 3.0.1, and each is a requirement. A custom TS licensee not adopting STS SR 3.0.1 must describe how its TSs contain these four elements.
>
> Please supplement your application to reflect the NRC staff's position above."

RESPONSE

By letter dated October 7, 2002 (NMP1L 1693), Nine Mile Point Nuclear Station, LLC (NMPNS) applied for an amendment to revise the NMP1 Technical Specifications (TSs) regarding missed surveillances using the CLIIP. This CLIIP item was published in the *Federal Register* on September 28, 2001 (66 FR 49714), as being applicable to all licensees who currently have or who will adopt TS requirements for a bases control program consistent with Section 5.5 of the STS. The *Federal Register* notice included a model application for licensees to request adoption of the CLIIP item.

The NMP1 application conformed with the model application for amendment published in the *Federal Register.* A license amendment request which included adoption of a Bases Control Program had been previously submitted by letter dated October 26, 2001 (NMP1L 1620). The January 23, 2003, RAI forwarded staff expectations concerning adoption of the CLIIP item by custom TS plants that were not previously communicated in the *Federal Register* notice.

NMP1 has custom TSs. While NMP1 Specification 3.0.1 includes general requirements related to surveillance requirements, the current TSs do not explicitly include all of the requirements in STS SR 3.0.1. Therefore, in response to the RAI, NMPNS proposes to add the equivalent of STS SR 3.0.1, and the associated Bases, to the NMP1 TSs.

PROPOSED CHANGE

Supplemental changes to the NMP1 TSs, beyond those proposed in the initial submittal to utilize the missed surveillances CLIIP item, are described below:

- Editorial formatting changes are made to TS Sections 3.0 and 4.0 to more closely correspond to the STS.

- Acronyms for "Limiting Condition for Operation" and "Surveillance Requirement" are utilized after initial use in TS Sections 3.0 and 4.0.

- Discussion concerning use of surveillance requirements is removed from Specification 3.0.1 since the general conditions for use of SRs are being added to Specification 4.0.1.

- Current Specification 4.0.1 concerning extensions of surveillance intervals is renumbered as Specification 4.0.2 consistent with the STS formatting.

- A new Specification 4.0.1 is added consistent with STS SR 3.0.1 concerning general conditions for use of surveillance requirements. The NMP1 TSs do not utilize the term "Mode" as used in the STS. "Reactor operating condition" is substituted for "Mode" in the new Specification 4.0.1 and associated Bases.

- The Bases for Specification 4.0.2 are moved to a new Bases-only page in the TSs.

- A general Bases statement for Section 4.0, consistent with the SR Bases approved for use at Nine Mile Point Unit 2, is added.

- A Bases section for new Specification 4.0.1, consistent with the Bases for STS SR 3.0.1, is added. The Bases incorporate changes consistent with NRC approved TSTF-8, Revision 2 (allowing credit for unplanned events to satisfy an SR), and TSTF-434, Revision 0 (stating that a surveillance can be performed in steps). The examples included in the STS Bases are not adopted, as examples are not included elsewhere in the NMP1 TSs.

- Editorial changes are made to Specification 4.3.3.b, TS Table 4.6.4-1, and Administrative Controls Sections 6.14, 6.16, 6.17, 6.18, and 6.19, to reflect the renumbering of current Specification 4.0.1 to 4.0.2. The addition of the reference to current Specification 4.0.1 was proposed to be added to Section 6.14 by the NMP1 license amendment request dated October 26, 2001 (NMP1L 1620). That amendment request is currently under NRC staff review.

Changes concerning new Specification 4.0.3 and its Bases, as well as the addition of appropriate references to Specification 4.0.3 in other TS sections, were described in the original, October 7, 2002, amendment request submittal.

TECHNICAL ANALYSIS

Analysis of the addition of the missed surveillance Specification 4.0.3 is included in the October 7, 2002, submittal and the September 28, 2001, *Federal Register* notice, and is not repeated herein. Editorial changes are described in the previous section of this attachment.

The addition of a new Specification 4.0.1 and Bases, consistent with STS SR 3.0.1 and the associated Bases, was requested by the NRC staff in the RAI. The new Specification 4.0.1 adds four explicit requirements to the TSs concerning general use of SRs included in the TSs. The four requirements are:

- SRs shall be met during the applicable reactor operating or other specified conditions for individual LCOs, unless otherwise stated in the SR.

- Failure to meet a surveillance, whether such failure is experienced during the performance of the surveillance or between performances of the surveillance, shall be failure to meet the LCO.

- Failure to perform a surveillance within the specified frequency shall be failure to meet the LCO except as provided in Specification 4.0.3.

- Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

The four requirements to be included in new Specification 4.0.1 are the current practice at NMP1. Therefore, adding a specification that explicitly lists the requirements will not change

any method of plant operation or interpretation of compliance with SRs, and as such, is considered an administrative addition only. Adoption of the STS SR 3.0.1 requirements also eliminates the need for Specification 3.0.1 to include more general requirements related to compliance with SRs.

NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

The proposed changes supplement those proposed in the Nine Mile Point Unit 1 (NMP1) license amendment request dated October 7, 2002, that would add Technical Specification (TS) requirements for missed surveillances consistent with the generically approved Consolidated Line Item Improvement Process (CLIIP) item and the model application for amendment published in the *Federal Register* on September 28, 2001 (66 FR 49714). The supplemental changes add new requirements related to the use and application of the surveillance requirements currently included in the NMP1 TSs. These new explicit SR applicability requirements supersede the more general requirements currently included in the TSs. The new TS requirements reflect the current practices at NMP1, and as such, do not change any existing method of plant operation.

Nine Mile Point Nuclear Station, LLC (NMPNS) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment 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.

Adoption of new administrative requirements related to the proper use of the surveillance requirements currently included in the NMP1 TSs do not affect any accident initiator, and as such, will have no effect on the probability of an accident. The proposed changes do not involve physical changes to the plant or introduce any new modes of operation. Accordingly, continued assurance is provided that the process variables, structures, systems, and components are maintained such that there will be no degradation of any fission product barrier which could increase the radiological consequences of an accident. Therefore, the proposed changes do 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.

Adoption of new administrative requirements related to the proper use of the surveillance requirements currently included in the NMP1 TSs will have no adverse effect on the

design or assumed accident performance of any structure, system, or component, or introduce any new modes of system operation or failure modes. Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

The proposed changes add new administrative requirements related to the proper use of the surveillance requirements currently included in the NMP1 TSs. The addition of requirements will make application of the surveillance requirements more restrictive than currently required by the TSs. Accordingly, the proposed changes do not involve a significant reduction in a margin of safety.

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

ENVIRONMENTAL CONSIDERATION

A review has determined that the supplemental revisions resulting from the request for additional information would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, 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.

ATTACHMENT 2

NINE MILE POINT NUCLEAR STATION, LLC

LICENSE NO. DPR-63

DOCKET NO. 50-220

"Marked-Up" Copy of the Current Technical Specifications (TS) and Bases

Drafts of new TS pages 27a through 27e are attached. Additionally, the current version of TS pages i, 27, 131, 263a, 373, 374 and 376 have been marked-up to reflect the proposed changes.

NINE MILE POINT NUCLEAR STATION
UNIT 1 - TECHNICAL SPECIFICATIONS
CONTENTS

3.0 LIMITING CONDITIONS FOR OPERATION (LCO) APPLICABILITY

3.0.1 OPERABILITY REQUIREMENTS

When a system, subsystem, train, component or device is determined to be inoperable solely because its emergency power source is inoperable, or solely because its normal power source is inoperable, it may be considered operable for the purpose of satisfying the requirements of its applicable Limiting Condition for Operation, provided: (1) its corresponding normal or emergency power source is operable; and (2) all of its redundant system(s), subsystem(s), train(s), component(s) and device(s) are operable, or likewise satisfy the requirements of this specification. Unless both conditions (1) and (2) are satisfied, the unit shall be placed in a condition stated in the individual specification.

In the event a Limiting Condition for Operation and/or associated surveillance requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, the unit shall be placed in a condition consistent with the individual specification unless corrective measures are completed that permit operation under the permissible surveillance requirements for the specified time interval as measured from initial discovery or until the reactor is placed in an operational condition in which the specification is not applicable.

4.0 SURVEILLANCE REQUIREMENTS (SR) APPLICABILITY

4.0.2 SURVEILLANCE INTERVALS

Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

BASES

Specification 4.0.2 establishes the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with a 24 month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Insert 1 (for TS Page 27)

4.0.1 SRs shall be met during the applicable reactor operating or other specified conditions for individual LCOs, unless otherwise stated in the SR. Failure to meet a surveillance, whether such failure is experienced during the performance of the surveillance or between performances of the surveillance, shall be failure to meet the LCO. Failure to perform a surveillance within the specified frequency shall be failure to meet the LCO except as provided in Specification 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

New TS Page 27a

4.0.3 If it is discovered that a surveillance was not performed within its specified frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is greater. This delay period is permitted to allow performance of the surveillance. A risk evaluation shall be performed for any surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable specification(s) must be entered.

When the surveillance is performed within the delay period and the surveillance is not met, the LCO must immediately be declared not met, and the applicable specification(s) must be entered.

New Bases Page 27b

BASES FOR 3.0 LIMITING CONDITION FOR OPERATION AND 4.0 SURVEILLANCE REQUIREMENT APPLICABILITY

Specifications 4.0.1 through 4.0.3 establish general requirements applicable to all specifications in Sections 4.1 through 4.7 and apply at all times, unless otherwise stated.

4.0.1 Specification 4.0.1 establishes the requirement that SRs must be met during the applicable reactor operating or other specified conditions for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This specification is to ensure that surveillances are performed to verify the operability of systems and components, and that variables are within specified limits. Failure to meet a surveillance within the specified frequency, in accordance with Specification 4.0.2, constitutes a failure to meet an LCO. Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire surveillance is performed within the specified frequency.

Systems and components are assumed to be operable when the associated SRs have been met. Nothing in this specification, however, is to be construed as implying that systems or components are operable when either:

a. The systems or components are known to be inoperable, although still meeting the SRs; or

b. The requirements of the surveillance(s) are known to be not met between required surveillance performances.

Surveillances do not have to be performed when the unit is in a reactor operating or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a special test exception LCO are only applicable when the special test exception LCO is used as an allowable exception to the requirements of a specification.

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given reactor operating or other specified condition.

New Bases Page 27c

BASES FOR 3.0 LIMITING CONDITION FOR OPERATION AND 4.0 SURVEILLANCE REQUIREMENT APPLICABILITY

Surveillances, including surveillances invoked by LCO actions, do not have to be performed on inoperable equipment because the applicable individual specifications define the remedial measures that apply. Surveillances have to be met and performed in accordance with Specification 4.0.2, prior to returning equipment to operable status.

Upon completion of maintenance, appropriate post maintenance testing is required to declare equipment operable. This includes ensuring applicable surveillances are not failed and their most recent performance is in accordance with Specification 4.0.2. Post maintenance testing may not be possible in the current reactor operating or other specified conditions in the LCO due to the necessary unit parameters not having been established. In these situations, the equipment may be considered operable provided testing has been satisfactorily completed to the extent possible and the equipment is not otherwise believed to be incapable of performing its function. This will allow operation to proceed to a reactor operating or other specified condition where other necessary post maintenance tests can be completed.

4.0.2 Specification 4.0.2 establishes the limit for which the specified time interval for SRs may be extended. It permits an allowable extension of the surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with a 24 month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgment and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the SRs. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Moved from Pg. 27

BASES FOR 3.0 LIMITING CONDITION FOR OPERATION AND 4.0 SURVEILLANCE REQUIREMENT APPLICABILITY

4.0.3 Specification 4.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a surveillance has not been completed within the specified frequency. A delay period of up to 24 hours or up to the limit of the specified frequency, whichever is greater, applies from the point in time it is discovered that the surveillance has not been performed in accordance with Specification 4.0.2, and not at the time that the specified frequency was not met. This delay period permits the completion of a surveillance before complying with LCO actions or other remedial measures that might preclude completion of the surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the surveillance, the safety significance of the delay in completing the required surveillance, and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the requirements.

When a surveillance with a frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to power operation, or in accordance with the 10 CFR 50 Appendix J Testing Program Plan, etc.) is discovered to not have been performed when specified, Specification 4.0.3 allows for the full delay period of up to the specified frequency to perform the surveillance. However, since there is not a time interval specified, the missed surveillance should be performed at the first reasonable opportunity.

Specification 4.0.3 provides a time limit for, and allowances for the performance of, surveillances that become applicable as a consequence of operating condition changes imposed by LCO actions.

Failure to comply with specified frequencies for surveillance requirements is expected to be an infrequent occurrence. Use of the delay period established by Specification 4.0.3 is a flexibility which is not intended to be used as an operational convenience to extend surveillance intervals. While up to 24 hours or the limit of the specified frequency is provided to perform the missed surveillance, it is expected that the missed surveillance will be performed at the first reasonable opportunity. The determination of the first reasonable opportunity should include consideration of the impact on plant risk (from delaying the surveillance as well as any plant configuration changes required or shutting the plant down to perform the

surveillance) and impact on any analysis assumptions, in addition to unit conditions, planning, availability of personnel, and the time required to perform the surveillance. The risk impact should be managed through the program in place to implement 10 CFR 50.65(a)(4) and its implementation guidance, NRC Regulatory Guide 1.182, "Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants." This Regulatory Guide addresses consideration of temporary and aggregate risk impacts, determination of risk management action thresholds, and risk management action up to and including plant shutdown. The missed surveillance should be treated as an emergent condition as discussed in the Regulatory Guide. The risk evaluation may use quantitative, qualitative, or blended methods. The degree of depth and rigor of the evaluation should be commensurate with the importance of the component. Missed surveillances for important components should be analyzed quantitatively. If the results of the risk evaluation determine the risk increase is significant, this evaluation should be used to determine the safest course of action. All missed surveillances will be placed in the Corrective Action Program.

If a surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable then is considered outside the specified limits and entry into the applicable LCO actions begin immediately upon expiration of the delay period. If a surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and entry into the applicable LCO actions begin immediately upon failure of the surveillance.

Completion of the surveillance within the delay period allowed by this specification, or within the times allowed by LCO actions, restores compliance with Specification 4.0.1.

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT

3.3.3 LEAKAGE RATE

Applicability:

Applies to the allowable leakage rate of the primary containment system.

Objective:

To assure the capability of the containment in limiting radiation exposure to the public from exceeding values specified in 10 CFR 100 in the event of a loss-of-coolant accident accompanied by significant fuel cladding failure and hydrogen generation from a metal-water reaction.

To assure that periodic surveillances of reactor containment penetrations and isolation valves are performed so that proper maintenance and repairs are made during the service life of the containment, and systems and components penetrating primary containment.

Specification:

Whenever the reactor coolant system temperature is above 215°F and primary containment integrity is required, the primary containment leakage rate shall be limited to:

4.3.3 LEAKAGE RATE

Applicability:

Applies to the primary containment system leakage rate.

Objective:

To verify that the leakage from the primary containment system is maintained within specified values.

Specification:

a. The primary containment leakage rates shall be demonstrated at test schedules and in conformance with the criteria specified in the 10 CFR 50 Appendix J Testing Program Plan as described in Specification 6.16.

b. The provisions of Specification 4.0.2 are not applicable, and the surveillance interval extensions are in accordance with the 10 CFR 50 Appendix J Testing Program Plan.

TABLE 4.6.4-1

SNUBBER VISUAL INSPECTION INTERVAL

NUMBER OF UNACCEPTABLE SNUBBERS			
Population or Category (Notes 1 and 2)	Column A Extend Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, that decision shall be made and documented before any inspection and shall serve as the basis upon which the next inspection interval for that category is determined.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use the next lower integer for the value of the limit for Columns A, B, or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval, but not greater than 48 months.

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B, but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in Column C, but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in Column B to the difference in the numbers in Columns B and C.

Note 6: The provisions of Specification 4.0.~~3~~ 2 are applicable for all inspection intervals up to and including 48 months.

6.13 Fire Protection Inspection

6.13.1 An independent fire protection and loss prevention inspection and audit shall be performed annually utilizing either qualified off-site licensee personnel or an outside fire protection firm.

6.13.2 An inspection and audit by an outside qualified fire consultant shall be performed at intervals no greater than 3 years.

6.14 Systems Integrity

Procedure shall be established, implemented and maintained to meet or exceed the requirements and recommendations of Section 2.1.6.a of NUREG 0578. The requirements shall apply to the Post Accident Sampling System (PASS) until such time as administrative controls provide for continuous isolation of the associated penetration(s) or a modification eliminates the potential leakage path(s).

Insert 2

6.15 ~~Iodine Monitoring~~

Procedures shall be established, implemented and maintained to meet or exceed the requirements and recommendations of Section 2.1.8.c of NUREG 0578.

6.16 10 CFR 50 Appendix J Testing Program Plan

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, entitled "Performance-Based Containment Leak-Test Program," dated September 1995 with the following exceptions:

1. Type A tests will be conducted in accordance with ANSI/ANS 56.8-1994 and/or Bechtel Topic BN-TOP-1, and

2. The first Type A test following approval of this Specification will be a full pressure test conducted approximately 70, rather than 48, months since the last low pressure Type A test.

The peak calculated containment internal pressure (Pac) for the design basis loss of coolant accident is 35 psig.

The maximum allowable primary containment leakage rate (La) at Pac shall be 1.5% of primary containment air weight per day.

Leakage Rate Surveillance Test acceptance criteria are:

1. The as-found Primary Containment Integrated Leak Rate Test (Type A Test) acceptance criteria is less than 1.0 L_a.

2. The as-left Primary Containment Integrated Leak Rate Test (Type A Test) acceptance criteria is less than or equal to 0.75 L_a, prior to entering a mode of operation where containment integrity is required.

3. The combined Local Leak Rate Test (Type B & C Tests including airlocks) acceptance criteria is less than 0.6 L_a, calculated on a maximum pathway basis, prior to entering a mode of operation where containment integrity is required.

Insert 2 (for TS Page 373)

The provisions of Specifications 4.0.2 and 4.0.3 are applicable to the 24 month frequency for performing system leak test activities.

4. The combined Local Leak Rate Test (Type B & C Tests including airlocks) acceptance criteria is less than 0.6 L_a, calculated on a minimum pathway basis, at all times when containment integrity is required.

The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the 10 CFR 50 Appendix J Testing Program Plan.

Insert 3

6.17 Inservice Testing Program

This program provides controls for inservice testing of Quality Group A, B, and C pumps and valves.

a. Inservice testing of Quality Group A, B, and C pumps and valves shall be performed in accordance with requirements for American Society of Mechanical Engineers (ASME) Code Class 1, 2, and 3 components specified in Section XI of the applicable ASME Boiler and Pressure Vessel Code Edition and Addenda, subject to the applicable provisions of 10CFR50.55a;

b. The provisions of Specification 4.0.5 and 4.0.3 are applicable to the normal and accelerated testing frequencies for performing inservice testing activities;

c. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any Technical Specification.

6.18 Radioactive Effluent Controls Program

This program conforms to 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:

a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;

b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001 - 20.2402;

Insert 3 (for TS Page 374)

The provisions of Specification 4.0.3 are applicable to the 10 CFR 50 Appendix J Testing Program Plan.

k. Limitations on venting and purging of the primary containment through the Emergency Ventilation System to maintain releases as low as reasonably achievable.

The provisions of Surveillance Requirement 4.0.2 and 4.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequencies.

6.19 Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the Main Condenser Offgas Treatment System and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks.

The program shall include:

a. The limits for concentrations of hydrogen in the Main Condenser Offgas Treatment System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion); and

b. A surveillance program to ensure that the quantity of radioactivity contained in all outside temporary liquid radwaste tanks that are not surrounded by liners, dikes, or walls, capable of holding tanks' contents and that do not have tank overflows and surrounding area drains connected to the Liquid Radwaste Treatment System is ≤10 Ci, excluding tritium and dissolved or entrained noble gases.

The provisions of Surveillance Requirement 4.0.2 and 4.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.