

December 1, 2003

U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

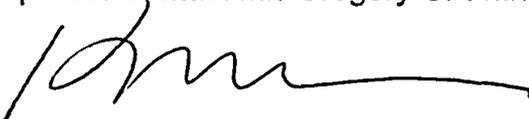
**DOCKETS 50-155 AND 72-043 - LICENSE DPR-6 - BIG ROCK POINT PLANT –
LICENSE AMENDMENT REQUEST – ADDITIONAL INFORMATION**

On August 6, 2003, Big Rock Point submitted a request to amend the Facility Operating License and Appendix A to the Operating License, Big Rock Point Defueled Technical Specifications pursuant to 10 CFR 50.90. As a result of Nuclear Regulatory Commission review, telephone conversations were held on November 10, November 13, and November 21, 2003 to resolve questions. Attachment 1 documents the questions discussed and Big Rock Point responses.

Attachments 2 through 5 are re-submittals of Attachments 3 through 6 originally submitted on August 6, 2003. This re-submittal corrects the original attachments, by incorporating comments from the questions, above. Corrections are marked with a double line in the right margin.

The revisions resulting from these discussions did not require safety reviews as they only correct typographical errors and re-insert previously removed programmatic descriptions in the Technical Specifications Administrative Section.

Prompt Nuclear Regulatory Commission review in this matter is appreciated. Once approved, the License and Defueled Technical Specification amendments will be implemented immediately. Should you have any questions concerning this letter, please contact Mr. Gregory C. Withrow at (231) 547-8176.



Kurt M. Haas
Site General Manager

cc: Administrator, Region III, USNRC
NRC Decommissioning Inspector – Big Rock Point
NRC NMSS Project Manager – James C. Shepherd
NRC NMSS Reviewer – Bill Huffman

Attachments

NMSS01

STATEMENT OF SIGNATURE UNDER OATH OR AFFIRMATION

Consumers Energy
Big Rock Point Plant

LICENSE AMENDMENT REQUEST – ADDITIONAL INFORMATION

Docket Numbers 50-155 and 72-043

License No DPR-6

At the request of the Commission and pursuant to the Atomic Energy Act of 1954, and the Energy Reorganization Act of 1974, as amended and the Commission's Rules and Regulations thereunder, Consumers Energy submits corrections to the request for revision of Defueled Technical Specification supplementing our August 6, 2003 License amendment request. The additional information corrects a typographical error and re-inserts Defueled Technical Specification Administrative requirements for Big Rock Point Programs.

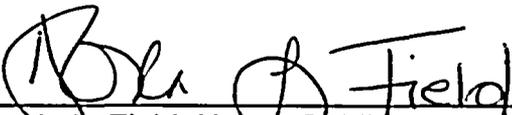
Consumers Energy Company

To the best of my knowledge, information, and belief, the contents of this submittal are truthful and complete.

By:  _____

Kurt M. Haas
Site General Manager

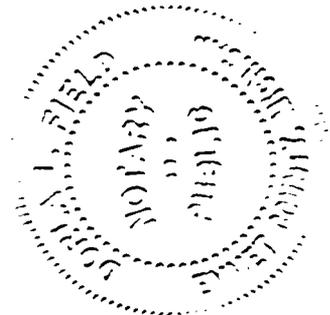
Sworn and subscribed before me this 1st day of December, 2003.

 _____

Dorla L. Field, Notary Public
Emmet County, Michigan

(SEAL)

My Commission expires July 18, 2006.



Attachment 1

Consumers Energy
BIG ROCK POINT
Docket Numbers 50-155 and 72-043

**Questions Related to Big Rock Point August 6, 2003 Defueled Technical
Specification Amendment Request**

December 1, 2003

2 Pages

Questions Related to Big Rock Point Defueled Technical Specification Amendment Request of August 6, 2003

The following items were discussed in telephone conversations held on November 10 and 13, 2003 between the NRC, NMSS reviewer (Bill Huffman) and Big Rock Point (Greg Withrow and Linda Castiglione):

- 1) Need to discuss the process used to arrive at the currently proposed license modification for Physical Protection. (In addition, what is the applicable NRC security order in effect at your site)

Applicable NRC Security Order in affect at Big Rock Point, with all spent nuclear fuel and special nuclear material located in the ISFSI facility, is dated October 16, 2002. BRP responded to the Order on November 4, 2002. However, the applicability of only the ISFSI Security Plan is documented in an NRC letter to BRP dated July 18, 2002. The July 18, 2002 letter approved revisions incorporating the Independent Spent Fuel Storage Installation (ISFSI) Security Plan. This approval recognized the applicability of the existing security plans (for spent fuel stored in wet storage in the Spent Fuel Pool. Consumers Energy letter dated March 27, 2003, provided revision to the Defueled Security Plan. The revision included an applicability statement for the Plan, which, in effect, stated that the Plan was no longer applicable with all spent fuel stored at the ISFSI.

- 2) Does the commitment to move the Plutonium – Beryllium neutron source to the ISFSI protected area need to be captured in the license or technical specifications?

The location of the Plutonium-Beryllium source is specified in Chapter 12 of our Updated Final Hazards Summary Report. This location was revised when the source was moved from its former location, inside the former plant industrial area, to the ISFSI facility.

- 3) Explain further how the requirements for the Offsite Dose Calculation Manual (ODCM) [and the Process Control Program (PCP)] can be removed from technical specifications. The standards for Operating Plant Technical Specifications have not relocated these requirements. It is unclear how 10 CFR 50.59 could be applied to the ODCM as a change control program.

We agree that the requirements for the ODCM and the PCP should NOT be eliminated from the Technical Specifications. These programs will be incorporated as License Conditions.

- 4) Please further explain what is replacing the existing monitoring station at Big Rock Point. (ISFSI Central Alarm Station?) Where will radiation alarms be monitored (for effluent releases from the decommissioning industrial site for instance)? Where will fire emergencies, medical emergencies, and Emergency Plan be coordinated?

The monitoring of licensed material is from the ISFSI Central Alarm Station. Radiation alarms are monitored locally for effluent releases. No releases are performed when the Operations monitoring is not available. Fire, medical, and Emergencies continue to be coordinated from the Emergency Support Center (ESC), which is located in the lower level of the ISFSI Administrative Building and includes the Central Alarm Station. Communications between Operations personnel is outlined in the Site Emergency Plan (phone/radios).

Questions Related to Big Rock Point Defueled Technical Specification Amendment Request of August 6, 2003

- 5) What will be the shift staffing for the ISFSI? Is this defined in any licensing basis document?

Shift staffing is defined by Emergency Plan and Security Plan requirements.

Per telephone conversation on November 21, 2003, the Big Rock Point Updated Final Hazards Summary Report will be updated (Chapter 13, Section 13.1.1, MANAGEMENT AND TECHNICAL SUPPORT ORGANIZATION). The second paragraph of this section currently reads:

"The Big Rock Point Site organization is shown on Figure 13.1. The Big Rock Point Site General Manager is responsible to the SNO for operation, maintenance, and decommissioning of the nuclear plant in such a manner as to achieve compliance with plant licenses and applicable regulations. These responsibilities and the associated authority are delegated in writing during the absence of the Site General Manager. The Site General Manager administers the Quality Program for the plant."

It will be revised to:

"The Big Rock Point Site organization is shown on Figure 13.1. The Big Rock Point Site General Manager is responsible to the SNO for operation, maintenance, and decommissioning of the nuclear plant in such a manner as to achieve compliance with plant licenses and applicable regulations. The Site General Manager verifies that Dry Fuel Storage Technical Specification surveillance(s) have been met. These responsibilities and the associated authority are delegated in writing. The Site General Manager administers the Quality Program for the plant. The Site General Manager, or his designate, shall verify that required security and emergency plan staffing has been met."

- 6) Please explain the struck-out words in the Fuel Storage Section of your Proposed change justification table in Attachment 3? The struck-out words under the Limiting Conditions for Operation are not in the current technical specification so why do you show them at all?

The struck-out words in question are a typographical error, and should not have been in the table (Attachment 3, Page 14.)

- 7) By removal of the shift supervisor position, who has the command and control function onsite at any given time? What licensing based document discusses this?

As defined by the Quality Program Description for Nuclear Power Plants Part 1 Big Rock Point Nuclear Plant, the Site General Manager, or his designate performs the normal command and control function. Delegation of the command and control function is defined in the Emergency and Security Plans. Currently, the Emergency Plan requires a Site Emergency Director (SED) on-Shift plus staffing required by the Security Plan. In the future (Emergency Plan Exemption submitted October 31, 2003), security will provide around-the-clock staffing with an on-call Emergency Manager.

Attachment 2

Consumers Energy
BIG ROCK POINT
Docket Numbers 50-155 and 72-043

**Discussion of Proposed
FACILITY OPERATING LICENSE
AND
DEFUELED TECHNICAL SPECIFICATIONS**

**(Originally submitted as Attachment 3 to August 6, 2003 Correspondence)
Revisions are Marked by a Double Line in the Right Margin**

December 1, 2003

36 Pages

ATTACHMENT 3

PROPOSED CHANGES – FACILITY OPERATING LICENSE

DESCRIPTION OF PROPOSED CHANGE		DISCUSSION
1.A	Deleted space after "licensee"	Editorial
C.(2)	<p><u>Technical Specifications</u></p> <p>The Technical Specifications contained in Appendix A, as revised through Amendment No. 424, xxx are hereby incorporated in the license. The licensee shall maintain the facility in accordance with the Technical Specifications.</p>	When approved, the NRC will issue the next consecutive number.
C.(3)	<p><u>Physical Protection</u></p> <p>The licensee shall fully implement and maintain in effect all provision of the physical security, guard training and qualification, and safeguards contingency plans approved by the Commission and all amendments and revisions to such plans made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p), as modified by NRC-approved exemptions. The plans, which contains Safeguards information protected under 10 CFR 73.21, are is entitled: "Big Rock Point Plant Defueled Security Plan," with revisions submitted through January 16, 2002; "Big Rock Point Defueled Suitability Training and Qualification Plan," with revisions submitted through March 12, 2002; "Big Rock Point Plant Defueled Safeguards Contingency Plan," with revisions submitted through January 14, 2002; and "Big Rock Point ISFSI Security Plan", as submitted on July 31, 2001 and modified by letter dated March 6, 2002. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.</p>	The required physical protection requirements (now that all spent fuel is in the ISFSI) for the facility are all addressed by the Big Rock Point ISFSI Security Plan that was submitted to the Commission by letter dated January 27, 2003. The dates are removed so that future submissions will not require an administrative license amendment.
D.	<p>Revise from: "This amended license becomes effective as of the date of its issuance and shall expire at midnight, May 31, 2000."</p> <p>To: "The license amendment is effective as of the date of its issuance and shall be implemented within 45 days of its issuance."</p>	Deleted expiration date – certification of cessation of operation and permanent removal of spent fuel was mad pursuant to 10 CFR

ATTACHMENT 3

PROPOSED CHANGES – FACILITY OPERATING LICENSE

DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
	<p>50.82 on September 23, 1997.</p> <p>In accordance with 10 CFR 50.51(b), for license facilities that have permanently ceased operation (continuation of license) continues in effect beyond the expiration date ... until the Commission notifies the licensee in writing that the license is terminated.</p>

ATTACHMENT 3
 PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS

DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p><u>TABLE OF CONTENTS</u></p> <p>DEFUELED TECHNICAL SPECIFICATIONS FOR BIG ROCK POINT PLANT</p>	
<p><u>SECTION</u></p>	
1.0 DEFINITIONS.....	1-1
1.1 Action.....	1-1
1.2 Certified Fuel Handler.....	1-1
1.32 Channel Calibration.....	1-1
1.43 Channel Check.....	1-1
1.54 Channel Functional Test.....	1-1
1.6 Containment Closure.....	1-1
1.7 Direct Path.....	1-2
1.8 Fuel Handling.....	1-2
1.95 Immediately.....	1-2
1.10 Monitoring Station.....	1-2
1.11 Offsite Dose Calculation Manual (ODCM).....	1-2
1.12 Operable – Operability.....	1-3
1.13 Process Control Program (PCP).....	1-3
1.146 Reportable Event.....	1-3
1.15 Shift.....	1-3

These deletions are administrative in nature and are a direct result from the changes made throughout the following pages of the technical specifications. See the reasons listed below for each of the proposed changes.

ATTACHMENT 3
PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS

DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
3/4.0 APPLICABILITY.....3/4-1 3/4.1 FUEL STORAGE.....3/4-2 3/4.1.1 Spent-Fuel-Pool-Parameters.....3/4-2-4 3/4.1.2 Spent-Fuel-Pool-Support-System-Requirements...3/4-5 & 6 3/4.1.3 Fuel-Storage-General-Requirements.....3/4-7 3/4.2 FUEL HANDLING.....3/4-8 3/4.2.1 Fuel-Handling-Support-System-Requirements.....3/4-8 3/4.2.2 Fuel-Handling-General-Requirements.....3/4-9 & 10	<p>These deletions are administrative in nature and are a direct result from the changes made throughout the following pages of the technical specifications. See the reasons listed below for each of the proposed changes.</p>
5.2 STORAGE AND INSPECTION OF SPENT FUEL.....5-1 5.2.1 Criticality.....5-1 5.2.2 Water-Level.....5-1 5.2.3 Cooling.....5-1 5.2.4 Capacity.....5-3 5.3 REACTOR.....5-3 5.3.1 Status.....5-3	<p>These deletions are administrative in nature and are a direct result from the changes made throughout the following pages of the technical specifications. See the reasons listed below for each of the proposed changes.</p>
6.1.3 Shift Supervisor.....6-1 TABLE 6.2-1, Minimum-Shift-Crew-Composition.....6-3 6.4 TRAINING 6.6.2.7 Fire-Protection-Program.....6-10 6.6.2.8 Cold-Weather-Protection-Program.....6-10 6.6.2.9 Spent-Fuel-Pool-Water-Chemistry-Program.....6-11 6.6.2.10 Inservice-Inspection-and-Testing-Program.....6-11	<p>These deletions are administrative in nature and are a direct result from the changes made throughout the following pages of the technical specifications. See the reasons listed below for each of the proposed changes.</p>

**ATTACHMENT 3
PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS**

DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p>1.2 CERTIFIED FUEL HANDLER</p> <p>CERTIFIED FUEL HANDLER, is an individual who is qualified in accordance with BRP Program D25.1, "Certified Fuel Handler Initial Certification Program."</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, maintaining individuals qualified as CERTIFIED FUEL HANDLERS is no longer required.</p>
<p>1.32 <u>CHANNEL CALIBRATION</u></p> <p>A CHANNEL CALIBRATION is the adjustment as necessary, of the channel output such that the channel responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and includes the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping, or total channel steps such that the entire channel is calibrated.</p>	<p>Correct typo (encompasses) and renumber. No other change proposed at this time.</p>
<p>Former section 1.4, (CHANNEL CHECK), renumber to 1.3</p>	<p>Editorial</p>

ATTACHMENT 3
PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS

	DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
1.54	<p data-bbox="359 232 810 269"><u>CHANNEL FUNCTIONAL TEST</u></p> <p data-bbox="359 310 1533 419">A CHANNEL FUNCTIONAL TEST is the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY performance, including alarm and trip functions.</p>	<p data-bbox="1564 232 1953 1095">This definition of OPERABILITY is based on the regulatory definition of Safety-related structures, systems and components that are relied upon to remain functional during and following design basis events to assure: (1) The integrity of the reactor coolant pressure boundary (2) The capability to shutdown the reactor and maintain it in a safe shutdown condition; or (3) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposure comparable to the applicable guideline exposures set forth in 10 CFR 50.34(a)(1) or 10 CFR 100.11 of this chapter, as applicable.</p> <p data-bbox="1564 1095 1932 1514">Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, there are no design basis events as evaluated in the UFHSR and the BFS SFSS SARS that require remaining systems, structures, or components to provide the assurances</p>

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PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS**

DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p>1.6 CONTAINMENT CLOSURE</p> <p>CONTAINMENT CLOSURE is that condition of containment in which there are no direct paths from containment atmosphere to the outside atmosphere, except for the containment ventilation inlet and exhaust valves, which may be open if at least one exhaust fan is in operation. Leak tightness is not required for CONTAINMENT CLOSURE to exist.</p>	<p>defined above. This defined term will be deleted from the technical specifications.</p> <p>For decommissioning the site boundary doses calculated for the postulated fuel handling accidents described in Chapter 15 of the UFHSR do not credit the containment vessel for mitigative purposes. However, the concept of CONTAINMENT CLOSURE and no DIRECT PATH were conservative and existed to mitigate the consequences of potential fuel handling accidents. Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, the need and/or desire for CONTAINMENT CLOSURE is no longer applicable. This defined term will be deleted from the technical specifications.</p>

ATTACHMENT 3
 PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS

DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p>1.7 DIRECT PATH</p> <p>A DIRECT PATH is a visually observable opening which permits the free exchange of air between containment and the environs. Equipment configurations or an engineered feature such as a closed valve, check valve, water seal, closed door, membrane layer, or securely fastened plate may be used to preclude direct paths. Redundancy of engineered features to eliminate direct paths is not required.</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, the concept of DIRECT PATH and the relationship to CONTAINMENT CLOSURE to mitigate potential fuel handling accidents is no longer applicable. This defined term will be deleted from the technical specifications</p>
<p>1.8 FUEL HANDLING</p> <p>FUEL HANDLING means the activities associated with moving spent nuclear fuel. When spent nuclear fuel is contained in a closed and sealed canister the activities associated with moving the canister are not to be considered FUEL HANDLING.</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, handling individual spent fuel assemblies in the spent fuel pool has ended. This defined term is no longer applicable and will be deleted from the technical specifications.</p>
<p>Former section 1.9 (IMMEDIATELY) renumber to 1.5</p>	<p>Editorial.</p>

ATTACHMENT 3
PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS

DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p>4.10 MONITORING STATION</p> <p>The MONITORING STATION is the facility which has monitoring, alarming, data archiving and limited control capabilities for selected system parameters during the decommissioning process. The Control Room shall remain the MONITORING STATION until such time as a new facility is activated to serve this function.</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, monitoring, alarming, data archiving and limited capabilities for selected system parameters are no longer applicable. In a permanently shutdown condition with all fuel stored at the ISFSI, Big Rock Point presents a significantly reduced risk to public health and safety. Big Rock Point SSCs that were required for spent fuel storage are not required and no longer require monitoring. There are no remote actions or indications other than security. This defined term will be deleted from the DTS.</p>

**ATTACHMENT 3
PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS**

DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p>1.11 OFFSITE DOSE CALCULATION MANUAL (ODCM)</p> <p>The OFFSITE DOSE CALCULATION MANUAL (ODCM) contains 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. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring programs required by Sections 6.6.2.5 and 6.6.2.6 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.7.2 and 6.7.3.</p>	<p>These technical specification requirements currently exist in a manual (Volume 25 – Big Rock Point Radiological Effluent T/S Required Documents: A. Offsite Dose Calculations and B. Process Control Program), and are referenced by the Updated Final Hazards Summary Report. Pursuant to NRC Administrative Letter 96-04: Efficient Adoption of Improved Standard Technical Specification, relocating the details of technical specification requirements in this manner is an acceptable approach because there is an applicable regulatory process for future changes, namely 10 CFR 50.59. Therefore this section will be deleted from the technical specifications.</p>
<p>1.12 OPERABLE – OPERABILITY</p> <p>— A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its safety function(s) are also capable of performing their related support function(s).</p>	<p>This definition is based on the regulatory definition of Safety-related structures, systems and components that are relied upon to remain functional during and following design basis events to assure: (1) The integrity of the reactor coolant pressure</p>

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DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
	<p>boundary (2) The capability to shutdown the reactor and maintain it in a safe shutdown condition; or (3) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposure comparable to the applicable guideline exposures set forth in 10 CFR 50.34(a)(1) or 10 CFR 100.11 of this chapter, as applicable. Administrative procedures are in place to ensure compliance with 10 CFR Part 21.</p> <p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, there are no design basis events as evaluated in the UFHSR and the BFS SFSS SARS that require remaining systems, structures, or components to provide the assurances defined above. This defined term will be deleted from the technical specifications.</p>

**ATTACHMENT 3
PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS**

DESCRIPTION OF PROPOSED CHANGE		DISCUSSION
1.13	<p><u>PROCESS CONTROL PROGRAM (PCP)</u></p> <p>The PROCESS CONTROL PROGRAM contains the methods and determinations which ensure that the processing and packaging of wet solid radioactive wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61 and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.</p>	<p>These technical specification requirements currently exist in a manual (Volume 25 – Big Rock Point Radiological Effluent T/S Required Documents: A. Offsite Dose Calculations and B. Process Control Program), and are referenced by the Updated Final Hazards Summary Report. Pursuant to NRC Administrative Letter 96-04: Efficient Adoption of Improved Standard Technical Specification, relocating the details of technical specification requirements in this manner is an acceptable approach because there is an applicable regulatory process for future changes, namely 10 CFR 50.59. Therefore this section will be deleted from the technical specifications.</p>
	<p>Former section 1.14 (REPORTABLE EVENT) renumber to section 1.6. Also revised referenced section I from 6.9 to 6.8 to reflect section 6 re-numbering.</p>	<p>Editorial.</p>

ATTACHMENT 3
 PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS

DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p>4.15 — SHIFT</p> <p>A SHIFT shall be the duration of the normal work period, which will be either 8 or 12 hours in length as determined by the Site General Manager. For purposes of determining the</p> <p>maximum allowable time between surveillances, when the specified surveillance interval is "One per Shift," the maximum allowable extension not to exceed 25 percent of the specified surveillance interval described in Surveillance Requirement 4.0.2 shall be based upon the SHIFT duration approved by the Site General Manager at that time.</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, SHIFT as defined has no merit. Pursuant to 10 CFR 50.54, SHIFT is directly associated with reactor operating mode, which is not applicable to the permanently defueled and decommissioning reactor facility. The only remaining surveillance is related to Sealed Sources, and the associated surveillance period is defined as every six months. This defined term will be deleted from the technical specifications.</p>

ATTACHMENT 3
 PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS

DESCRIPTION OF PROPOSED CHANGE		DISCUSSION
<p>3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS</p> <p>3/4.0 APPLICABILITY</p> <p>SURVEILLANCE REQUIREMENTS</p> <p>4.0.3 Unless specified otherwise, performance of a Surveillance Requirement within the specified time interval including the maximum allowable extension shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements.</p>	<p>The definition of OPERABILITY has been removed from the technical specifications. See previous and following discussions. to the permanently defueled and decommissioning reactor facility.</p>	
<p>3/4.1 FUEL STORAGE</p> <p>3/4.1.1 SPENT FUEL POOL PARAMETERS</p> <p>LIMITING CONDITIONS FOR OPERATION</p> <p>Based on the permanent removal of spent fuel from the spent fuel pool, associated LIMITING CONDITIONS OF OPERATION and SURVEILLANCE REQUIREMENTS are no longer applicable. The spent fuel is now controlled by a different set of approved technical specifications issued and approved pursuant to 10 CFR Part 72.</p> <p>3.1.1 The following parameters shall be monitored and maintained within the limits indicated:</p> <p style="padding-left: 40px;">a. The water level in the Spent Fuel Pool shall be maintained at or above 630'.</p> <p style="padding-left: 40px;">b. Spent Fuel Pool water temperature shall be maintained greater than 40°F and less than 140°F.</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, related Limiting Conditions for Operation and Surveillance Requirements are no longer applicable and will be deleted from the technical specifications. The spent fuel is now managed by a different set of approved technical specifications issued and approved pursuant to 10 CFR Part 72.</p>	

ATTACHMENT 3
 PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS

DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p>e. Water chemistry in the Spent Fuel Pool shall be maintained within the following:</p> <p style="padding-left: 40px;">pH 5.0 to 9.0</p> <p style="padding-left: 40px;">Conductivity less than or equal to 10.0 micromhos per cm at 77 °F</p> <p>d. Radiation levels in the area of the Spent Fuel Pool shall be normally monitored by two gamma radiation monitors, each with a locally and remotely audible alarm set at not less than 5 millirems per hour and not more than 20 millirems per hour, except during the movement of spent fuel or radioactive components in or adjacent to the Spent Fuel Pool, when alarm settings may be raised above 20 mrem/hr provided the overall detection criterion in 10 CFR 70.24(a)(2) is satisfied. At least one monitor is required to be OPERABLE. The monitors shall have remote indication and the capability of recording data.</p> <p><u>APPLICABILITY:</u> When spent fuel is in the Spent Fuel Pool.</p> <p><u>ACTION:</u></p> <p style="padding-left: 40px;">i. With the requirements of 3.1.1.a not met, IMMEDIATELY suspend activities having potential to drain the Spent Fuel Pool. Place fuel assemblies and the crane load in a safe condition, suspend further movement of fuel assemblies and crane operations with loads in or over the Spent Fuel Pool, and initiate action to restore Spent Fuel Pool water level. Within 24 hours establish CONTAINMENT CLOSURE.</p> <p style="padding-left: 40px;">ii. With the requirements of 3.1.1.b not met, IMMEDIATELY place fuel assemblies and the crane load in a safe</p>	

ATTACHMENT 3
PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS

DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p>condition, suspend further movement of fuel assemblies and crane operations with loads in or over the Spent Fuel Pool, and initiate ACTION to restore acceptable temperature. Within 24 hours establish CONTAINMENT CLOSURE.</p> <p>iii. If the water quality specifications of 3.1.1.c are exceeded, initiate corrective measures to meet chemistry requirements within 24 hours and sample pool water at least once a day until readings meet the requirements of 3.1.1.c. If water quality cannot be recovered after one week, prepare a special report that identifies the causes and proposed corrective action(s) to ensure future water quality is in compliance and submit to the NRC by 31 days following entry into the LCO.</p> <p>iv. With the requirements of 3.1.1.d not met, IMMEDIATELY provide an alternate method of monitoring Spent Fuel Pool radiation levels. If the alternate instrumentation does not have an audible alarm, locally and in the MONITORING STATION, radiation levels shall be continuously monitored by personnel in communication with the MONITORING STATION, when personnel are in the vicinity of the Spent Fuel Pool.</p> <p>The provisions of Specification 3.0.3 are not applicable.</p> <p>SURVEILLANCE REQUIREMENTS</p> <p>4.1.1.a — Twice per SHIFT, the water level in the Spent Fuel Pool shall be determined to be at or above the elevation of 630'.</p> <p>4.1.1.b — Twice per SHIFT, Spent Fuel Pool water temperature shall be determined to meet the requirements of Specification 3.1.1.b.</p>	

**ATTACHMENT 3
PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS**

DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p>4.1.1.c — Once per 31 days, Spent Fuel Pool water chemistry shall be determined to meet the requirements of Specification 3.1.1.e</p> <p>4.1.1.d — The Spent Fuel Pool radiation monitor required by this specification shall be demonstrated operable:</p> <p style="padding-left: 40px;">i. — Daily by performing a CHANNEL CHECK.</p> <p style="padding-left: 40px;">ii. — Once per 31 days by performing a CHANNEL CALIBRATION.</p>	
<p>3/4.1 — FUEL STORAGE</p> <p>3/4.1.2 — SPENT FUEL POOL SUPPORT SYSTEM REQUIREMENTS</p> <p>LIMITING CONDITIONS FOR OPERATION</p> <p>Based on the permanent removal of spent fuel from the spent fuel pool, associated LIMITING CONDITIONS OF OPERATION and SURVEILLANCE REQUIREMENTS are no longer applicable. The spent fuel is now controlled by a different set of approved technical specifications issued and approved pursuant to 10 CFR Part 72.</p> <p>3.1.2 — The capability to supply makeup to the Spent Fuel Pool shall be maintained as follows:</p> <p style="padding-left: 40px;">a. — A diesel generator capable of providing power within 24 hours to operate an onsite electric motor driven pump shall be available <u>OR</u>,</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, related Limiting Conditions for Operation and Surveillance Requirements are no longer applicable and will be deleted from the technical specifications. The spent fuel is now managed by a different set of approved technical specifications issued and approved pursuant to 10 CFR Part 72.</p>

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<p>One offsite source of ac power capable of providing power to operate an onsite electric motor driven pump shall be available;</p> <p><u>OR:</u></p> <p>An onsite pump not requiring electrical power shall be capable of providing makeup water to the Spent Fuel Pool within 24 hours.</p> <p>b. The pump designated to satisfy the requirements of Specification 3.1.2.a shall be capable of supplying at least 28 gpm of water within 24 hours at a temperature equal to or less than 100 °F to the Spent Fuel Pool. The capability to manually initiate at least 28 gpm flow to the Spent Fuel Pool shall be maintained.</p> <p><u>APPLICABILITY:</u> When spent fuel is in the Spent Fuel Pool.</p> <p><u>ACTION:</u> With the requirements of Specifications 3.1.2.a or 3.1.2.b not met, within 24 hours establish an alternate source of water capable of delivering at least 28 gpm of water at a temperature equal to or less than 100 °F to the Spent Fuel Pool.</p> <p>The provisions of Specification 3.0.3 are not applicable.</p> <p><u>SURVEILLANCE REQUIREMENTS</u></p> <hr/> <p>4.1.2.a <i>i.</i> Daily, verify the presence of potential on the offsite power line.</p> <p><i>ii.</i> Once per 31 days, manually start the diesel generator and run loaded for 30 minutes using an electric motor driven pump as a load.</p>	

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<p>4.1.2.b i. Once per 12 months, verify that the pumps satisfying the requirements of this specification are capable of supplying water within 24 hours and will deliver at least 28 gpm of water.</p> <p>ii. Once per 12 months, Spent Fuel Pool makeup shall be determined to be OPERABLE by verifying its flow capacity to be at least 28 gpm.</p>	
<p>3/4.1 FUEL STORAGE</p> <p>3/4.1.3 FUEL STORAGE GENERAL REQUIREMENTS</p> <p>LIMITING CONDITIONS FOR OPERATION</p> <p>Based on the permanent removal of spent fuel from the spent fuel pool, associated LIMITING CONDITIONS OF OPERATION and SURVEILLANCE REQUIREMENTS are no longer applicable. The spent fuel is now controlled by a different set of approved technical specifications issued and approved pursuant to 10 CFR Part 72.</p> <p>3.1.3 The following limitations shall apply to the storage of spent fuel in the Spent Fuel Pool:</p> <p>a. Spent fuel assemblies shall be stored in fuel storage racks located in the Spent Fuel Pool.</p> <p>b. The storage of materials in the area directly between rack B and the east wall of the Spent Fuel Pool is prohibited.</p> <p>APPLICABILITY: When spent fuel is in the Spent Fuel Pool.</p> <p>ACTION: With the requirements of Specifications 3.1.3.a or 3.1.3.b not met, suspend</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, related Limiting Conditions for Operation and Surveillance Requirements are no longer applicable and will be deleted from the technical specifications. The spent fuel is now managed by a different set of approved technical specifications issued and approved pursuant to 10 CFR Part 72.</p>

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<p>Spent Fuel Pool work activities other than required surveillance activities and perform a prompt investigation to determine the cause and initiate appropriate corrective actions.</p> <p>SURVEILLANCE REQUIREMENTS</p> <hr/> <p>4.1.3 a. At least semi-annually and within 4 hours of completion of any activity involving movement of spent fuel in the Spent Fuel Pool, verify that the requirements of Specification 3.1.3.a have been met.</p> <p>b. At least semi-annually and within 4 hours of completion of any activity involving movement of components in the Spent Fuel Pool, verify that the requirements of Specification 3.1.3.b have been met.</p>	
<p>3/4.2 FUEL HANDLING</p> <p>3/4.2.1 FUEL HANDLING SUPPORT SYSTEM REQUIREMENTS</p> <p>LIMITING CONDITIONS FOR OPERATION</p> <p>Based on the permanent removal of spent fuel from the spent fuel pool, associated LIMITING CONDITIONS OF OPERATION and SURVEILLANCE REQUIREMENTS are no longer applicable. The spent fuel is now controlled by a different set of approved technical specifications issued and approved pursuant to 10 CFR Part 72.</p> <p>3.2.1 The following conditions apply when handling fuel inside containment.</p> <p>a. For containment penetrations or openings, CONTAINMENT CLOSURE shall exist and containment ventilation valves shall be closed or capable of being closed.</p> <p>b. Radiation levels shall be maintained below the alarm setting requirements of</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, related Limiting Conditions for Operation and Surveillance Requirements are no longer applicable and will be deleted from the technical specifications. The spent fuel is now managed by a different set of approved technical specifications issued and approved pursuant to 10 CFR Part 72.</p>

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<p style="text-align: center;">Specification 3.1.1.d:</p> <p>APPLICABILITY: During FUEL HANDLING operations</p> <p>ACTION:</p> <p style="padding-left: 40px;">i. With the requirements of Specification 3.2.1.a not met, place fuel assemblies in a safe condition, and suspend FUEL HANDLING activities inside containment.</p> <p style="padding-left: 40px;">ii. With the requirements of Specification 3.2.1.b not met, initiate closure of containment ventilation inlet and exhaust valves and initiate corrective actions to reduce the radiation levels to acceptable values.</p> <p>SURVEILLANCE REQUIREMENTS</p> <p>4.2.1 a. Prior to commencement of FUEL HANDLING activities, perform verification of CONTAINMENT CLOSURE for all containment penetrations or openings and verify OPERABILITY of containment ventilation valves (CV-4094, CV-4095, CV-4096, CV-4097).</p> <p style="padding-left: 40px;">b. Verify that the radiation levels on the Spent Fuel Pool area radiation monitor are less than the alarm setting requirements of Specification 3.1.1.d at least twice per SHIFT.</p>	
<p>3/4.2 FUEL HANDLING</p> <p>3/4.2.2 FUEL HANDLING GENERAL REQUIREMENTS</p> <p>LIMITING CONDITIONS FOR OPERATION</p> <p>Based on the permanent removal of spent fuel from the spent fuel pool, associated LIMITING CONDITIONS OF OPERATION and SURVEILLANCE REQUIREMENTS are no longer applicable. The spent fuel is now controlled by a different set of approved technical specifications issued and</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, related Limiting Conditions for Operation and Surveillance Requirements are no longer applicable and will be deleted from the technical specifications.</p>

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<p>approved pursuant to 10 CFR Part 72.</p> <p>3.2.2 FUEL HANDLING operations shall conform to the following requirements:</p> <p>a. Movement of spent fuel into and out of the storage racks or inspection stations shall be restricted to one assembly at a time.</p> <p>b. Radiation levels at the south wall of the Spent Fuel Pool, elevation 600'6", shall be maintained at less than 50 mrem/hr above the background level during FUEL HANDLING operations.</p> <p>c. FUEL HANDLING shall be accomplished by manual guidance and visual observation of all FUEL HANDLING operations.</p> <p>d. Water shall be used as the basic shielding except when transferring spent fuel from the Spent Fuel Pool using the dry fuel storage system transfer cask.</p> <p><u>APPLICABILITY:</u> When handling fuel in the Spent Fuel Pool.</p> <p><u>ACTION:</u></p> <p>i. With the requirements of Specification 3.2.2.a not met, suspend FUEL HANDLING operations and place irradiated fuel assemblies in a safe condition. Conduct a prompt investigation to determine the cause and initiate appropriate corrective actions.</p> <p>ii. With the requirements of Specification 3.2.2.b not met, IMMEDIATELY suspend FUEL HANDLING operations, initiate action to restore radiation levels to less than 50 mrem/hr above background levels and conduct a prompt investigation to determine the cause of increased radiation levels. FUEL HANDLING may resume if it is determined that increased radiation levels have not been caused by the handling of fuel in the Spent Fuel Pool and radiation levels are verified to be within the required range.</p>	<p>The spent fuel is now managed by a different set of approved technical specifications issued and approved pursuant to 10 CFR Part 72.</p>

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<p>iii. With the requirements of Specification 3.2.2.c not met, suspend FUEL HANDLING operations. FUEL HANDLING may resume once the requirements of 3.2.2.c have been re-established.</p> <p>iv. With the requirements of Specification 3.2.2.d not met, suspend FUEL HANDLING operations. FUEL HANDLING may resume once the requirements of 3.2.2.d have been re-established.</p> <p>SURVEILLANCE REQUIREMENTS</p> <p>4.2.2 a. None.</p> <p>b. Prior to commencing, once per SHIFT during and IMMEDIATELY upon completion of FUEL HANDLING operations, monitor the radiation levels at the south wall of the Spent Fuel Pool, elevation 600'6", to verify that the requirements of Specification 3.2.2.b are met.</p> <p>c. None.</p> <p>d. None.</p>	
<p>Former section 3/ 4.4 was re-numbered to 3 /4.1 (SEALED SOURCE CONTAMINATION) Report reference was revised to 6.4.4a</p>	<p>Editorial / administrative revision to match repagination.</p>
<p>5.2 STORAGE AND INSPECTION OF SPENT FUEL</p> <p>Applicability: The design features specified in Section 5.2 apply only when irradiated fuel is stored in the Spent Fuel Pool.</p> <p>5.2.1 CRITICALITY</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, these sections are no longer applicable and will be deleted from the technical specifications.</p>

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<p>Spent fuel is stored in spent fuel storage racks which are designed and shall be maintained with sufficient center-to-center distance between stored fuel assemblies to ensure a k_{eff} less than or equal to 0.95 when the racks are flooded with unborated water. The fuel loading per axial centimeter of any assembly placed in the Spent Fuel Pool shall be less than or equal to a maximum of 28.3 grams of U^{235} or equivalent.</p> <p>Fuel inspection stations, if installed, shall be designed and maintained with sufficient center-to-center distance between fuel assemblies placed in the inspection stations to ensure a k_{eff} less than or equal to 0.95 when flooded with unborated water.</p> <p>5.2.2 WATER LEVEL</p> <p>The Spent Fuel Pool is designed to maintain a normal water level between 630' and 632' 6".</p> <p>5.2.3 COOLING</p> <p>The configuration of storage racks placed in the Spent Fuel Pool allows for adequate circulation of water to prevent localized pool boiling.</p> <p>Figure 5.1-1 BRP Site Map</p> <p>5.2.4 CAPACITY</p> <p>Subject to the limits listed below, the fuel pool is designed for and shall be maintained with a storage capacity of no more than 441 fuel assemblies. In addition, fuel pins which have been removed from fuel assemblies shall be stored in the Spent Fuel Pool and shall be in a geometry which ensures subcriticality. The following limits apply to the amount of special nuclear material which may be stored in the Spent Fuel Pool:</p> <p>□ 2500 kilograms of contained uranium-235.</p>	

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 <p>□10.32 grams of uranium-235 as contained in fission counters.</p> <p>□150 kilograms of plutonium contained in PuO₂-UO₂ fuel rods.</p> <p>□5 curies of plutonium encapsulated as a plutonium-beryllium source.</p> 	
 <p>5.3 — <u>REACTOR</u></p> <p>5.3.1 — <u>STATUS</u></p> <p>The reactor is not licensed for power operation. Fuel shall not be placed in the reactor vessel.</p> 	<p>Delete reference. Extraneous information that is no longer required in Technical Specifications.</p>
 <p>6.1.3 — <u>SHIFT SUPERVISOR</u></p> <p>The Shift Supervisor shall be responsible for the shift command function. This position will be filled by a Certified Fuel Handler.</p> 	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, the shift supervisor is no longer required (see "SHIFT" and "CERTIFIED FUEL HANDLER" discussion) and the definition will be deleted from the technical specifications.</p>

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6.1.2	<p data-bbox="331 261 730 294">SITE GENERAL MANAGER</p> <p data-bbox="331 338 1354 636">The Site General Manager shall be responsible for overall facility operation, maintenance and decommissioning and for periods of absence shall delegate in writing the succession to this responsibility. Unless otherwise specified, the Site General Manager's delegate has authority to perform all actions and grant approvals assigned by these specifications to the Site General Manager. The Site General Manager may delegate specific tasks to other individuals who may perform those tasks whether the Site General Manager is absent or present at the site.</p>	<p data-bbox="1537 227 1822 300">Correct typo (Decommissioning).</p>

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DESCRIPTION OF PROPOSED CHANGE		DISCUSSION
6.2	<u>ORGANIZATION</u>	Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, CPC-2A has been revised and submitted to the NRC for review. CPC-2A provides a description of the organization, and can be directly referenced to improve this technical specification section.
6.2.1	<p>REPORTING RELATIONSHIPS</p> <p>Onsite organization and corporate reporting relationship shall be established for activities affecting safety of the facility, as described in the "Quality Program Description for Nuclear Power Plants, Part 1 – Big Rock Point (CPC-2A)".</p> <p>a. Lines of authority, responsibility and communication shall be established and documented in facility administrative procedures.</p> <p>b. The Site General Manager shall be responsible for safe operation of the facility and shall have control over those onsite activities necessary for safe operation and maintenance of the facility. The individual filling this position shall report directly to the Senior Nuclear Officer.</p> <p>e. The individuals who perform audits, surveillances and independent safety reviews report to the Manager, Nuclear Performance Assessment Department.</p> <p>d. The individuals who train the Certified Fuel Handlers and those who carry out radiation protection functions report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.</p>	
6.2.2	<p>FACILITY ORGANIZATION</p> <p>The Site General Manager or his designate shall verify that required security staffing and</p>	Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage,

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<p>Dry Fuel Storage Technical Specifications surveillances have been met.</p> <p>The facility organization shall be subject to the following:</p> <p>a. Each on-duty shift shall be comprised of at least the minimum shift crew composition shown in Table 6.2-1.</p> <p>b. At least one individual, who shall be qualified to stand watch in the MONITORING STATION, shall be in the MONITORING STATION when irradiated fuel is in the Spent Fuel Pool.</p> <p>e. During operations without FUEL HANDLING either the SHIFT Supervisor or the Non-Certified Operator shall be qualified in radiation protection procedures; or a Radiation Protection Technician shall be on site. During FUEL HANDLING operations a qualified Radiation Protection Technician shall be on site.</p> <p>d. When spent fuel is stored in the Spent Fuel Pool or during FUEL HANDLING operations, administrative procedures shall be implemented to limit the working hours of the facility staff who perform safety-related functions, and activities important to the safe storage of spent fuel (ISSSF) and the monitoring and control of radiological hazards (IMCRH). These individuals include the minimum SHIFT crew required by Table 6.2-1, key maintenance personnel and Radiation Protection Technicians.</p> <p>Adequate SHIFT coverage shall be maintained without routine heavy use of overtime. However, in the event that unforeseen problems require substantial amounts of overtime to be used, the following guidelines shall be followed:</p>	<p>this section is no longer applicable and can be revised to improve the technical specifications.</p> <p>See previous discussions for deleted definitions as they appear in this paragraph.</p>

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DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p>(1) An individual should not be permitted to work more than 16 hours straight, excluding SHIFT turnover time.</p> <p>(2) An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding SHIFT turnover time.</p> <p>(3) A break, including SHIFT turnover time, of at least 8 hours should be allowed after continuous work periods of 16 hours duration.</p> <p>Any deviation from the above guidelines shall be authorized by the Site General Manager or designated alternates in accordance with established administrative procedures and with documentation of the basis for granting the deviation. Administrative procedures shall include a requirement for the Site General Manager or designated alternates to review individual overtime on a monthly basis in order to verify that excessive hours have not been assigned. Routine deviations from the above guidelines are not authorized.</p>	

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DESCRIPTION OF PROPOSED CHANGE		DISCUSSION															
<p><u>TABLE 6.2-1: MINIMUM SHIFT CREW COMPOSITION DURING PERMANENTLY DEFUELED CONDITION</u></p> <table border="1"> <thead> <tr> <th align="center">POSITION</th> <th align="center">STAFFING FOR OPERATIONS WITHOUT FUEL HANDLING</th> <th align="center">STAFFING DURING FUEL HANDLING OPERATIONS</th> </tr> </thead> <tbody> <tr> <td>SHIFT Supervisor (CERTIFIED FUEL HANDLER)</td> <td align="center">1</td> <td align="center">1</td> </tr> <tr> <td>Non-Certified Operator</td> <td align="center">1</td> <td align="center">1</td> </tr> <tr> <td>CERTIFIED FUEL HANDLER</td> <td></td> <td align="center">1</td> </tr> <tr> <td>Radiation Protection Technician</td> <td align="center">1*</td> <td align="center">1</td> </tr> </tbody> </table>		POSITION	STAFFING FOR OPERATIONS WITHOUT FUEL HANDLING	STAFFING DURING FUEL HANDLING OPERATIONS	SHIFT Supervisor (CERTIFIED FUEL HANDLER)	1	1	Non-Certified Operator	1	1	CERTIFIED FUEL HANDLER		1	Radiation Protection Technician	1*	1	
POSITION	STAFFING FOR OPERATIONS WITHOUT FUEL HANDLING	STAFFING DURING FUEL HANDLING OPERATIONS															
SHIFT Supervisor (CERTIFIED FUEL HANDLER)	1	1															
Non-Certified Operator	1	1															
CERTIFIED FUEL HANDLER		1															
Radiation Protection Technician	1*	1															
<p>*—If Shift Supervisor or Non-Certified Operator are not certified in Radiation Protection Procedures</p> <p>_____ f. _____ The SHIFT Supervisor shall be a CERTIFIED FUEL HANDLER.</p> <p>_____ g. _____ The SHIFT Supervisor shall report to an individual who is _____ CERTIFIED FUEL HANDLER.</p> <p>_____ h. _____ Personnel requirements of (a) and (c) above may be less than the _____ minimum specified for a period of time not to exceed 2 hours in order _____ to accommodate unexpected absence of on-duty personnel provided _____ immediate ACTION is taken to restore the minimum requirements _____ specified. This provision only applies to on-SHIFT personnel and _____ does not permit any SHIFT crew position to be unmanned upon _____ SHIFT change due to oncoming SHIFT crew member being late or _____ absent.</p>																	

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DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p>6.4 TRAINING</p> <p>A training program for the facility's CERTIFIED FUEL HANDLERS shall meet the requirements and recommendations of Section 5.5 of ANSI N18.1-1971. The Site General Manager has overall responsibility for implementation and maintenance of the training program.</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, these sections are no longer applicable and will be deleted from the technical specifications.</p>
<p>Renumber section 6.5 (REVIEW AND AUDIT) to 6.4 and reformat title of CPC-2A within the paragraph.</p>	<p>Editorial.</p>
<p>6.65 <u>PROCEDURES AND PROGRAMS</u></p> <p>6.65.1 PROCEDURES</p> <p>6.65.1.1 <u>Scope</u></p> <p>Written procedures shall be established, implemented and maintained for safety quality related structures, systems components and safety actions activities defined in the Big Rock Point Decommissioning Quality List and those structures, systems, components and activities important to the safe storage of spent fuel (ISSSF) and monitoring and control of radiological hazards (MCRH). These procedures shall meet or exceed the requirements of ANSI N18.7-1976, as described endorsed by the Quality Program Description (CPC-2A). Written procedures shall also be established, implemented, and maintained covering the following activities:</p> <ul style="list-style-type: none"> a. Defueled ISFSI Security Plan; b. Defueled Emergency Plan; c. Fire Protection Plan d. Quality Program Description (CPC-2A); and, e. All programs listed in Specification 6.65.2. 	<p>The regulatory definition of Safety-Related structures, systems and components that are relied upon to remain functional during and following design basis events to assure: (1) The integrity of the reactor coolant pressure boundary (2) The capability to shutdown the reactor and maintain it in a safe shutdown condition; or (3) The capability to prevent or mitigate the consequences of accidents which could result in potential offsite exposure comparable to the applicable guideline exposures set forth in 10 CFR 50.34(a)(1) or 10 CFR 100.11 of this chapter, as applicable, is no longer applicable to the Big Rock</p>

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	<p>Point site.</p> <p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, there are no design basis events consequences as evaluated in the UFHSR and the BFS SFSS SARS that require remaining systems, structures, or components to provide the assurances defined above.</p> <p>The term “safety-related” has been modified to be consistent with the term “Important to Safety”, which is used in the recently revised Quality Program Description that endorses the requirements of ANSI N18.7 1976.</p> <p>This paragraph has also been revised to reflect revisions in terminology in the Quality Program Description, the removal of “Defueled” prior to Security (renamed the “ISFSI Security Plan to be consistent with the license), and Emergency Plans for simplification, and the deletion of section 6.6.2.7 of this current technical</p>

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DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p>Renumber items in section 6.6 as 6.5</p>	<p>specification.</p> <p>Editorial</p>
<p>Former section 6.6.1.1 (Renumbered to 6.5.1.1), Deleted reference to “safety related” and replaced with “quality related” Deleted Important to the Safe Storage of Spent Fuel (ISSSF) and Important for the Control and Monitoring of Radiological Hazards (IMCRH) form paragraph and “endorsed by the Quality Program Description” was revised to “described by the Quality Program Description...”</p> <p>Revised the list of activities requiring written procedure from: “a. Defueled Security Plan; b. Defueled Emergency Plan; c. Quality Program Description (CPC-2A); and d. All programs listed in Specification 6.6.2.”</p> <p>To: “a. ISFSI Security Plan; b. Emergency Plan; c. Fire Protection Plan; d. Quality Program Description (CPC-2A); and e. Radiation Protection Program.”</p>	<p>Safety-related SSCs are no longer applicable with all spent fuel stored on the ISFSI. Activities/programs that are ISSSF are no longer applicable with all spent fuel on the ISFSI. IMCRH is achieved through compliance with CPC-2A and a10 CFR Part 20.</p> <p>ISFSI security plan is the only applicable security plan with all spent fuel on the ISFSI (reference letter to the NRC dated March 27, 2003.)</p> <p>Emergency Plan name has been revised.</p> <p>Added Fire Protection Plan for consistency with revision in deletion of former section 6.6.2.7</p> <p>Added Radiation Protection Program to eliminate numbering-cross references.</p>

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DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p><u>6.6.2.7 Fire Protection Program</u></p> <p>A fire protection program meeting the requirements of 10 CFR 50.48(f) shall be established, implemented, and maintained</p>	<p>As a Part 50 licensee Big Rock Point is obligated to abide by Federal Regulation. This is a redundant requirement and will be deleted from this section of the technical specifications. Also see section 6.6.1.1 above.</p>
<p><u>6.6.2.9 Spent Fuel Pool Water Chemistry Program</u></p> <p>This program uses procedures to provide controls for monitoring Spent Fuel Pool water chemistry. The Spent Fuel Pool Water Chemistry Program shall be established, implemented, and maintained whenever irradiated fuel is stored in the Spent Fuel Pool.</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, this section is no longer applicable and will be deleted from the technical specifications.</p>
<p><u>6.6.2.10 Inservice Inspection and Testing Program</u></p> <p>a. Applicability</p> <p style="padding-left: 40px;">Applies to Inservice Inspection and Testing of ASME Code Class 1, Class 2 and Class 3 piping systems and components.</p> <p>b. Objective</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, and the fact that there are no longer any Code Class 1, Class 2 and Class 3 piping systems and components inservice at the facility, these sections are no longer applicable and will be deleted from the technical</p>

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DESCRIPTION OF PROPOSED CHANGE	DISCUSSION
<p style="text-align: center;">To insure integrity of the Class 1, Class 2 and Class 3 piping systems and components.</p> <p>e. — Specifications</p> <p>1. — Inservice Inspection of ASME Code Class 1, 2 and 3 components and Inservice Testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i), and where provisions of Sections 11.4.1.4, 4.1.5 and 11.4.3.4 take precedence.</p> <p>2. — Sufficient records of each inspection shall be kept to allow comparison and evaluation of future tests.</p> <p>3. — The Inservice Inspection program shall be reevaluated as required by 10 CFR 50, Section 50.55a(g)(5) to consider incorporation of new inspection techniques that have been proven practical, and the conclusions of the evaluation shall be used as appropriate to update the inspection program.</p>	<p>specifications.</p>
<p>Renumbered former section 6.7 to 6.2.</p>	<p>Editorial.</p>

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PROPOSED CHANGES – DEFUELED TECHNICAL SPECIFICATIONS**

DESCRIPTION OF PROPOSED CHANGE		DISCUSSION
<p>6.76.4 <u>SPECIAL REPORTS</u></p> <p>The following special reports shall be submitted to the NRC as indicated.</p> <p>a. If the water quality specifications of 3.1.1.c are exceeded, and the water quality cannot be recovered after one week, prepare a special report that identifies the causes and proposed corrective action(s) to ensure future water quality is in compliance and submit to the NRC by 31 days following entry into the LCO.</p> <p>b.a. If the sealed source contamination limits of Specification 3.4.1 are exceeded, a special report shall be submitted to the NRC within 30 days of identification of the existence of the excessive contamination. The report shall describe the equipment involved, the test results and corrective actions taken.</p> <p>c. Inservice Inspection reports required by 10 CFR 50.55a and Section XI of the ASME Boiler and Pressure Vessel Code.</p>	<p>Based on the permanent removal of the spent fuel from the spent fuel pool and placement into dry storage, this section is no longer applicable and will be deleted from the technical specifications. <u>Re-letter as shown.</u></p>	
<p>Renumbered former section 6.8 (RECORDS) to 6.7 Corrected title of CPC-2A</p>	<p>Editorial.</p>	
<p>6.98 <u>REPORTABLE EVENTS</u></p> <p>A reportable event is any event or condition that must be reported to the NRC in accordance with 10 CFR 50.72, 10 CFR 50.73, or 10 CFR 50.9(b), or 10 CFR 72.75.</p>	<p>Added 10 CFR 72.75 to ensure that events or conditions requiring reporting are initiated.</p>	

Attachment 3

Consumers Energy
BIG ROCK POINT
Docket Numbers 50-155 and 72-043

Proposed

**FACILITY OPERATING LICENSE
AND
TECHNICAL SPECIFICATIONS
(Lined Copy)**

**(Originally submitted as Attachment 4 to August 6, 2003 Correspondence)
Revisions are Marked by a Double Line in the Right Margin**

December 1, 2003

42 Pages

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555

CONSUMERS ENERGY COMPANY

DOCKET NO 50-155

BIG ROCK POINT PLANT

FACILITY OPERATING LICENSE

License No DPR-6

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consumers Power Company (renamed Consumers Energy Company by Amendment No. 119, the licensee-) dated January 13, 1975, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. Construction of the Big Rock Point Plant (the facility) has been substantially completed in conformity with Construction Permit No. CPPR-9 and the application, as amended, the provisions of the Act and the rules and regulations of the Commission;
 - C. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - D. There is reasonable assurance: (i) that the activities authorized by this operating license can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the rules and regulations of the Commission;
 - E. The licensee is technically and financially qualified to engage in the activities authorized by this operating license in accordance with the rules and regulations of the Commission;
 - F. The licensee has satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;
 - G. The issuance of this operating license will not be inimical to the common defense and security or to the health and safety of the public; and

- H. The receipt, possession, and use of source, byproduct and special nuclear material as authorized by this license will be in accordance with the Commission's regulations in 10 CFR Parts 30, 40, and 70, including 10 CFR Sections 30.33, 40.32, and 70.23 and 70.31.
2. Facility Operating License No. DPR-6, issued to the Consumers Energy Company, is hereby amended in its entirety to read as follows:
- A. This license applies to the Big Rock Point Plant (the facility) owned by Consumers Energy Company (the licensee). The facility is located in Charlevoix County, Michigan, and is described in the licensee's application dated January 14, 1960, and the Final Hazards Summary Report, as supplemented, updated, and amended by subsequent filings by the licensee.
- B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses Consumers Energy Company:
- B.(1) Pursuant to Section 104b of the Act and 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities" to possess the facility at the designated location in Charlevoix County, Michigan, in accordance with the procedures and limitations set forth in this license;
- B.(2) Pursuant to the Act and 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material," to possess at any one time up to (a) 2500 kilograms of contained uranium 235 in fuel rods, (b) 10.32 grams of uranium 235 as contained in fission counters, (c) 150 kilograms of plutonium contained in PuO₂-UO₂ fuel rods, and (d) 5 curies of plutonium encapsulated as a plutonium-beryllium neutron source;
- (a) Deleted
- (b) Deleted
- (c) Deleted
- (d) Deleted
- (e) Deleted
- (f) Deleted
- (g) Deleted
- (3) Pursuant to the Act and 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of By-product Material," to receive, possess and use at any one time up to 7000 curies of antimony-beryllium in the form of neutron sources, 3.7 curies of cobalt-60 as sealed sources, 45 curies of cesium-137 as sealed sources, 10 microcuries of miscellaneous alpha emitting material as sealed sources, and up to 500 millicuries per nuclide of any byproduct material between atomic numbers 1 and 83, inclusive, without restriction as to chemical and physical form;

2.B.(4) Pursuant to the Act and 10 CFR Part 40, "Domestic Licensing of Source Material," to possess at any one time up to 500 kilograms of depleted uranium dioxide contained in the facility's fuel assemblies;

(5) Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such by product and special nuclear materials as may be produced by the operation of the facility.

C. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

C.(1) Reactor Operation

The reactor is not licensed for power operation. Fuel shall not be placed in the reactor vessel.

C.(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 124, xxx are hereby incorporated in the license. The licensee shall maintain the facility in accordance with the Technical Specifications.

C.(3) Physical Protection

The licensee shall fully implement and maintain in effect all provision of the physical security, guard training and qualification, and safeguards contingency plans approved by the Commission and all amendments and revisions to such plans made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p), as modified by NRC-approved exemptions. The plans, which contains Safeguards information protected under 10 CFR 73.21, are is entitled: "~~Big Rock Point Plant Defueled Security Plan,~~" with revisions submitted through January 16, 2002; "~~Big Rock Point Defueled Suitability Training and Qualification Plan,~~" with revisions submitted through March 12, 2002; "~~Big Rock Point Plant Defueled Safeguards Contingency Plan,~~" with revisions submitted through January 14, 2002; and "~~Big Rock Point ISFSI Security Plan~~" as submitted on July 31, 2001 and modified by letter dated March 6, 2002. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

2.C.(4) Deleted

2.C.(5) Deleted

2.C.(6) Deleted

2.C.(7) Deleted

- D. ~~This amended license becomes~~ The license amendment is effective as of the date of its issuance and shall ~~expire at midnight, May 31, 2000~~ be implemented within 45 days of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

~~Original signed by Richard D. Silver~~
_____ for Signature

~~Dennis L. Ziemann, Chief Name~~
~~Operating Reactor Branch No. 2~~
~~Division of Licensing~~ TITLE

Attachment:
Change No. 46 xxx to the
Technical Specifications

Date of Issuance: ~~December 19, 1975~~ DATE

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

CONSUMERS ENERGY COMPANY

DOCKET NO. 50-155

BIG ROCK POINT PLANT

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 124

License No. DPR-6

4. ~~The Nuclear Regulatory Commission (the Commission) has found that:~~
- ~~A. The application for amendment by Consumers Energy Company (the licensee) dated June 11, 2002, as supplemented by letter dated July 3, 2002, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 40 CFR Chapter I;~~
 - ~~B. The facility will be maintained in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;~~
 - ~~C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the rules and regulations of the Commission;~~
 - ~~D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and~~
 - ~~E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the rules and regulations of the Commission and all applicable requirements have been satisfied.~~

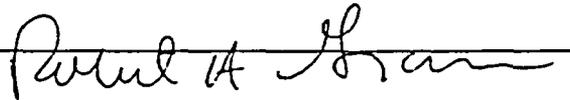
~~2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. DPR-6 and is hereby amended to read as follows:~~

~~2. Technical Specifications~~

~~The Technical Specifications contained in Appendix A, as revised through Amendment No. 124, are hereby incorporated in the license. The licensee shall maintain the facility in accordance with the Technical Specifications.~~

~~3. The license amendment is effective as of its date of issuance and shall be implemented within 45 days from the date of issuance.~~

~~FOR THE NUCLEAR REGULATORY COMMISSION~~

~~~~

~~Robert A. Gramm, Chief, Section 1
Project Directorate IV
Division of Licensing Project Management
Office of Nuclear Reactor Regulation~~

~~Attachment: Changes to the Technical
Specifications~~

~~Date of Issuance: September 11, 2002~~

BIG ROCK POINT RESTORATION PROJECT
DETAILED TECHNICAL SPECIFICATIONS

Amendment XXX122, 124
DATE September 11, 2002

**DEFUELED TECHNICAL SPECIFICATIONS
FOR
BIG ROCK POINT PLANT
DOCKET 50-155**

LIST OF EFFECTIVE PAGES

as of
**AMENDMENT 124XXX
September 11, 2002 DATE**

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LICENSE - Page 2	120	12/24/1998
LICENSE - Page 3	124XXX	09/11/2002 DATE
LICENSE - Page 4	124XXX	12/19/1975 DATE
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<u>Section 2 - SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS</u>		
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Amendment 121123, 123124XXX
January 13, 2000 September 11, 2002 DATE

DEFUELED TECHNICAL SPECIFICATIONS
 BIG ROCK POINT PLANT - DOCKET 50-155
 AMENDMENT 124-XXX DATED SEPTEMBER 11, 2002 DATE

DESCRIPTION	AMENDMENT NUMBER	REVISION DATE
<u>Section 5 - DESIGN FEATURES</u>		
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Page 6-1	120XXX	12/24/1998DATE
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Page 6-5	120XXX	12/24/1998DATE
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BASES	----	N/A
(Pages B3/4-1 through B 3/4-143)		

Amendment ~~121123, 123124XXX~~
 January 13, 2000 September 11, 2002 DATE

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

1.0 DEFINITIONS

1.1 ACTION

ACTION shall be that part of a specification which prescribes remedial measures required under designated conditions.

~~1.2 CERTIFIED FUEL HANDLER~~

~~CERTIFIED FUEL HANDLER, is an individual who is qualified in accordance with BRP Program D25.1, "Certified Fuel Handler Initial Certification Program."~~

1.32 CHANNEL CALIBRATION

A CHANNEL CALIBRATION is the adjustment as necessary, of the channel output such that the channel responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and includes the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping, or total channel steps such that the entire channel is calibrated.

1.43 CHANNEL CHECK

A CHANNEL CHECK is the qualitative assessment of channel behavior during operation by observation. This assessment shall include, where possible comparison of the channel indication and/or status with other indications and/or status derived from independent instrumentation channels measuring the same parameter.

1.54 CHANNEL FUNCTIONAL TEST

A CHANNEL FUNCTIONAL TEST is the injection of a simulated signal into the channel as close to the sensor as practicable to verify OPERABILITY performance, including alarm and trip functions.

~~1.6 CONTAINMENT CLOSURE~~

~~CONTAINMENT CLOSURE is that condition of containment in which there are no direct paths from containment atmosphere to the outside atmosphere, except for the containment ventilation inlet and exhaust valves, which may be open if at least one exhaust fan is in operation. Leak tightness is not required for CONTAINMENT CLOSURE to exist.~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

1.0 DEFINITIONS

~~1.7~~ DIRECT PATH

~~A DIRECT PATH is a visually observable opening which permits the free exchange of air between containment and the environs. Equipment configurations or an engineered feature such as a closed valve, check valve, water seal, closed door, membrane layer, or securely fastened plate may be used to preclude direct paths. Redundancy of engineered features to eliminate direct paths is not required.~~

~~1.8~~ FUEL HANDLING

~~FUEL HANDLING means the activities associated with moving spent nuclear fuel. When spent nuclear fuel is contained in a closed and sealed canister, the activities associated with moving the canister are not to be considered FUEL HANDLING.~~

1.95 IMMEDIATELY

When "IMMEDIATELY" is used as a completion time for a required ACTION, the ACTION should be pursued without delay and in a controlled manner.

~~1.10~~ MONITORING STATION

~~The MONITORING STATION is the facility which has monitoring, alarming, data archiving and limited control capabilities for selected system parameters during the decommissioning process. The Control Room shall remain the MONITORING STATION until such time as a new facility is activated to serve this function.~~

~~1.11~~ OFFSITE DOSE CALCULATION MANUAL (ODCM)

~~The OFFSITE DOSE CALCULATION MANUAL (ODCM) contains 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. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring programs required by Sections 6.6.2.5 and 6.6.2.6 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.7.2 and 6.7.3.~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

1.0 DEFINITIONS

~~1.12~~ OPERABLE - OPERABILITY

~~A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s) and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its safety function(s) are also capable of performing their related support function(s).~~

~~1.13~~ PROCESS CONTROL PROGRAM (PCP)

~~The PROCESS CONTROL PROGRAM contains the methods and determinations which ensure that the processing and packaging of wet solid radioactive wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61 and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.~~

1.146 REPORTABLE EVENT

A REPORTABLE EVENT is any of those conditions specified as reportable in Specification 6.96.8.

~~1.15~~ SHIFT

~~A SHIFT shall be the duration of the normal work period, which will be either 8 or 12 hours in length as determined by the Site General Manager. For purposes of determining the maximum allowable time between surveillances, when the specified surveillance interval is "Once per SHIFT," the maximum allowable extension not to exceed 25 percent of the specified surveillance interval described in Surveillance Requirement 4.0.2 shall be based upon the SHIFT duration approved by the Site General Manager at that time.~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

2.0 SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

There are no safety limits or limiting safety system settings applicable to the permanently defueled condition.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.0 APPLICABILITY

LIMITING CONDITIONS FOR OPERATION

- 3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.
- 3.0.2 Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.
- 3.0.3 Unless otherwise specified, entry into an applicability condition shall not be made unless the conditions of the associated Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements.

SURVEILLANCE REQUIREMENTS

- 4.0.1 Unless specified otherwise, Surveillance Requirements shall be applicable during the specified applicable conditions for the associated Limiting Conditions for Operation.
- 4.0.2 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.
- 4.0.3 Unless specified otherwise, performance of a Surveillance Requirement within the specified time interval including the maximum allowable extension shall constitute compliance with ~~OPERABILITY~~ requirements for a Limiting Condition for Operation and associated ACTION statements.
- 4.0.4 Unless specified otherwise, entry into a specified applicable condition shall not be made unless the Surveillance Requirements associated with the Limiting Condition for Operation have been performed within the stated surveillance interval including the maximum allowable extension.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

~~3/4.1 FUEL STORAGE~~

~~3/4.1.1 SPENT FUEL POOL PARAMETERS~~

LIMITING CONDITIONS FOR OPERATION

~~3.1.1 The following parameters shall be monitored and maintained within the limits indicated:~~

~~a. The water level in the Spent Fuel Pool shall be maintained at or above 630%.~~

~~b. Spent Fuel Pool water temperature shall be maintained greater than 40°F and less than 140°F.~~

~~c. Water chemistry in the Spent Fuel Pool shall be maintained within the following:~~

~~— pH 5.0 to 9.0~~

~~— Conductivity less than or equal to 10.0 micromhos per cm at 77°F~~

~~d. Radiation levels in the area of the Spent Fuel Pool shall be normally monitored by two gamma radiation monitors, each with a locally and remotely audible alarm set at not less than 5 millirems per hour and not more than 20 millirems per hour, except during the movement of spent fuel or radioactive components in or adjacent to the Spent Fuel Pool, when alarm settings may be raised above 20 mrem/hr provided the overall detection criterion in 10 CFR 70.24(a)(2) is satisfied. At least one monitor is required to be OPERABLE. The monitors shall have remote indication and the capability of recording data.~~

APPLICABILITY: ~~When spent fuel is in the Spent Fuel Pool.~~

ACTION: ~~i. With the requirements of 3.1.1.a not met, IMMEDIATELY suspend activities having potential to drain the Spent Fuel Pool. Place fuel assemblies and the crane load in a safe condition, suspend further movement of fuel assemblies and crane operations with loads in or over the Spent Fuel Pool, and initiate action to restore Spent Fuel Pool water level. Within 24 hours establish CONTAINMENT CLOSURE.~~

~~ii. With the requirements of 3.1.1.b not met, IMMEDIATELY place fuel assemblies and the crane load in a safe condition, suspend further movement of fuel assemblies and crane operations with loads~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

~~3/4.1 — FUEL STORAGE~~

~~3/4.1.1 — SPENT FUEL POOL PARAMETERS~~

LIMITING CONDITIONS FOR OPERATION

~~in or over the Spent Fuel Pool, and initiate ACTION to restore acceptable temperature. Within 24 hours establish CONTAINMENT CLOSURE.~~

~~iii. — If the water quality specifications of 3.1.1.c are exceeded, initiate corrective measures to meet chemistry requirements within 24 hours and sample pool water at least once a day until readings meet the requirements of 3.1.1.c. If water quality cannot be recovered after one week, prepare a special report that identifies the causes and proposed corrective action(s) to ensure future water quality is in compliance and submit to the NRC by 31 days following entry into the LCO.~~

~~iv. — With the requirements of 3.1.1.d not met, IMMEDIATELY provide an alternate method of monitoring Spent Fuel Pool radiation levels. If the alternate instrumentation does not have an audible alarm, locally and in the MONITORING STATION, radiation levels shall be continuously monitored by personnel in communication with the MONITORING STATION, when personnel are in the vicinity of the Spent Fuel Pool.~~

The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

~~4.1.1.a — Twice per SHIFT, the water level in the Spent Fuel Pool shall be determined to be at or above the elevation of 630'.~~

~~4.1.1.b — Twice per SHIFT, Spent Fuel Pool water temperature shall be determined to meet the requirements of Specification 3.1.1.b.~~

~~4.1.1.c — Once per 31 days, Spent Fuel Pool water chemistry shall be determined to meet the requirements of Specification 3.1.1.c.~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

~~3/4.1 FUEL STORAGE~~

~~3/4.1.1 SPENT FUEL POOL PARAMETERS~~

SURVEILLANCE REQUIREMENTS

~~4.1.1.d The Spent Fuel Pool radiation monitor required by this specification shall be demonstrated operable:~~

~~i. Daily by performing a CHANNEL CHECK.~~

~~ii. Once per 31 days by performing a CHANNEL CALIBRATION.~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

~~3/4.1 — FUEL STORAGE~~

~~3/4.1.2 — SPENT FUEL POOL SUPPORT SYSTEM REQUIREMENTS~~

LIMITING CONDITIONS FOR OPERATION

~~3.1.2 — The capability to supply makeup to the Spent Fuel Pool shall be maintained as follows:~~

~~a. — A diesel generator capable of providing power within 24 hours to operate an onsite electric motor driven pump shall be available OR,~~

~~One offsite source of ac power capable of providing power to operate an onsite electric motor driven pump shall be available, OR,~~

~~An onsite pump not requiring electrical power shall be capable of providing makeup water to the Spent Fuel Pool within 24 hours.~~

~~b. — The pump designated to satisfy the requirements of Specification 3.1.2.a shall be capable of supplying at least 28 gpm of water within 24 hours at a temperature equal to or less than 100 °F to the Spent Fuel Pool. The capability to manually initiate at least 28 gpm flow to the Spent Fuel Pool shall be maintained.~~

APPLICABILITY: ~~When spent fuel is in the Spent Fuel Pool.~~

ACTION: ~~With the requirements of Specifications 3.1.2.a or 3.1.2.b not met, within 24 hours establish an alternate source of water capable of delivering at least 28 gpm of water at a temperature equal to or less than 100 °F to the Spent Fuel Pool.~~

~~The provisions of Specification 3.0.3 are not applicable.~~

SURVEILLANCE REQUIREMENTS

~~4.1.2.a — i. — Daily, verify the presence of potential on the offsite power line.~~

~~ii. — Once per 31 days, manually start the diesel generator and run loaded for 30 minutes using an electric motor driven pump as a load.~~

~~4.1.2.b — i. — Once per 12 months, verify that the pumps satisfying the requirements of this specification are capable of supplying water within 24 hours and will deliver at least 28 gpm of water.~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

~~3/4.1 FUEL STORAGE~~

~~3/4.1.2 SPENT FUEL POOL SUPPORT SYSTEM REQUIREMENTS~~

SURVEILLANCE REQUIREMENTS

~~ii. Once per 12 months, Spent Fuel Pool makeup shall be determined to be OPERABLE by verifying its flow capacity to be at least 28 gpm.~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

3/4.1 FUEL STORAGE

3/4.1.3 FUEL STORAGE GENERAL REQUIREMENTS

LIMITING CONDITIONS FOR OPERATION

3.1.3 The following limitations shall apply to the storage of spent fuel in the Spent Fuel Pool:

- a. Spent fuel assemblies shall be stored in fuel storage racks located in the Spent Fuel Pool.
- b. The storage of materials in the area directly between rack B and the east wall of the Spent Fuel Pool is prohibited.

APPLICABILITY: When spent fuel is in the Spent Fuel Pool.

ACTION: With the requirements of Specifications 3.1.3.a or 3.1.3.b not met, suspend Spent Fuel Pool work activities other than required surveillance activities and perform a prompt investigation to determine the cause and initiate appropriate corrective actions.

SURVEILLANCE REQUIREMENTS

- 4.1.3 a. At least semi-annually and within 4 hours of completion of any activity involving movement of spent fuel in the Spent Fuel Pool, verify that the requirements of Specification 3.1.3.a have been met.
- b. At least semi-annually and within 4 hours of completion of any activity involving movement of components in the Spent Fuel Pool, verify that the requirements of Specification 3.1.3.b have been met.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

3/4.2 — FUEL HANDLING

3/4.2.1 — FUEL HANDLING SUPPORT SYSTEM REQUIREMENTS

LIMITING CONDITIONS FOR OPERATION

- 3.2.1 — The following conditions apply when handling fuel inside containment:
- a. — For containment penetrations or openings, CONTAINMENT CLOSURE shall exist and containment ventilation valves shall be closed or capable of being closed.
 - b. — Radiation levels shall be maintained below the alarm setting requirements of Specification 3.1.1.d.

APPLICABILITY: During FUEL HANDLING operations

- ACTION:
- i. — With the requirements of Specification 3.2.1.a not met, place fuel assemblies in a safe condition, and suspend FUEL HANDLING activities inside containment.
 - ii. — With the requirements of Specification 3.2.1.b not met, initiate closure of containment ventilation inlet and exhaust valves and initiate corrective actions to reduce the radiation levels to acceptable values.

SURVEILLANCE REQUIREMENTS

- 4.2.1 — a. — Prior to commencement of FUEL HANDLING activities, perform verification of CONTAINMENT CLOSURE for all containment penetrations or openings and verify OPERABILITY of containment ventilation valves (CV 4094, CV 4095, CV 4096, CV 4097).
- b. — Verify that the radiation levels on the Spent Fuel Pool area radiation monitor are less than the alarm setting requirements of Specification 3.1.1.d at least twice per SHIFT.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

3/4.2 FUEL HANDLING

3/4.2.2 FUEL HANDLING GENERAL REQUIREMENTS

LIMITING CONDITIONS FOR OPERATION

~~3.2.2 FUEL HANDLING operations shall conform to the following requirements:~~

- ~~a. Movement of spent fuel into and out of the storage racks or inspection stations shall be restricted to one assembly at a time.~~
- ~~b. Radiation levels at the south wall of the Spent Fuel Pool, elevation 600'6", shall be maintained at less than 50 mrem/hr above the background level during FUEL HANDLING operations.~~
- ~~c. FUEL HANDLING shall be accomplished by manual guidance and visual observation of all FUEL HANDLING operations.~~
- ~~d. Water shall be used as the basic shielding except when transferring spent fuel from the Spent Fuel Pool using the dry fuel storage system transfer cask.~~

APPLICABILITY: ~~When handling fuel in the Spent Fuel Pool.~~

- ACTION:
- ~~i. With the requirements of Specification 3.2.2.a not met, suspend FUEL HANDLING operations and place irradiated fuel assemblies in a safe condition. Conduct a prompt investigation to determine the cause and initiate appropriate corrective actions.~~
 - ~~ii. With the requirements of Specification 3.2.2.b not met, IMMEDIATELY suspend FUEL HANDLING operations, initiate action to restore radiation levels to less than 50 mrem/hr above background levels and conduct a prompt investigation to determine the cause of increased radiation levels. FUEL HANDLING may resume if it is determined that increased radiation levels have not been caused by the handling of fuel in the Spent Fuel Pool and radiation levels are verified to be within the required range.~~
 - ~~iii. With the requirements of Specification 3.2.2.c not met, suspend FUEL HANDLING operations. FUEL HANDLING may resume once the requirements of 3.2.2.c have been re-established.~~
 - ~~iv. With the requirements of Specification 3.2.2.d not met, suspend FUEL HANDLING operations. FUEL HANDLING may resume once the requirements of 3.2.2.d have been re-established.~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

~~3/4.2 FUEL HANDLING~~

~~3/4.2.2 FUEL HANDLING GENERAL REQUIREMENTS~~

SURVEILLANCE REQUIREMENTS

~~4.2.2 a. None.~~

~~b. Prior to commencing, once per SHIFT during and IMMEDIATELY upon completion of FUEL HANDLING operations, monitor the radiation levels at the south wall of the Spent Fuel Pool, elevation 600'6", to verify that the requirements of Specification 3.2.2.b are met.~~

~~c. None.~~

~~d. None.~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

3/4.3 CONTROL OF HEAVY LOADS

LIMITING CONDITIONS FOR OPERATION

3.3.1 (DELETED)

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

3/4.3 — CONTROL OF HEAVY LOADS

SURVEILLANCE REQUIREMENTS

4.3.1 — (DELETED)

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

3/4.41 SEALED SOURCE CONTAMINATION

LIMITING CONDITIONS FOR OPERATION

- 3.4.1 Each sealed source containing more than 100 microcuries of beta and/or gamma emitting material, or more than 5 microcuries of alpha emitting material shall not have removable contamination which equals or exceeds 0.005 microcuries.

APPLICABILITY: At all times.

- ACTION:
1. Each sealed source with removable contamination in excess of the above limits shall be IMMEDIATELY withdrawn from use and either decontaminated and repaired, or disposed of in accordance with NRC regulations.
 - a. A special report shall be submitted to the NRC as indicated by Specification 6.7.4.b.

SURVEILLANCE REQUIREMENTS

- 4.4.1 Except for: 1) sealed sources which are stored and not in use, and 2) start up sources and fission detectors previously subjected to core neutron flux, sealed sources containing radioactive materials in any form other than gas and with a half-life greater than 30 days (excluding ${}^3\text{H}$) shall be tested for contamination and/or leakage at least once per six months by the licensee or other person specifically authorized by the NRC or an Agreement State to perform such services. The test method shall have a detection sensitivity of at least 0.005 microcuries per test sample. The test sample shall be taken from the sealed source or from the surfaces of the device in which the sealed source is permanently mounted or stored, on which one might expect contamination to accumulate. Records of leak test results shall be kept in units of microcuries and maintained for inspection by the NRC.
- a. Sealed sources requiring testing by this section, but exempted on the basis of not being in use, shall have been tested within 6 months prior to being transferred or put into use.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

5.0 DESIGN FEATURES

5.1 SITE

5.1.1 LOCATION AND BOUNDARIES

The plant site is located in Charlevoix County, Michigan, about 4 miles northeast of Charlevoix, Michigan, and about 11 miles west of Petoskey, Michigan.

~~5.2 STORAGE AND INSPECTION OF SPENT FUEL~~

~~Applicability: The design features specified in Section 5.2 apply only when irradiated fuel is stored in the Spent Fuel Pool.~~

~~5.2.1 CRITICALITY~~

~~Spent fuel is stored in spent fuel storage racks which are designed and shall be maintained with sufficient center-to-center distance between stored fuel assemblies to ensure a k_{eff} less than or equal to 0.95 when the racks are flooded with unborated water.~~

~~The fuel loading per axial centimeter of any assembly placed in the Spent Fuel Pool shall be less than or equal to a maximum of 28.3 grams of U^{235} or equivalent.~~

~~Fuel inspection stations, if installed, shall be designed and maintained with sufficient center-to-center distance between fuel assemblies placed in the inspection stations to ensure a k_{eff} less than or equal to 0.95 when flooded with unborated water.~~

~~5.2.2 WATER LEVEL~~

~~The Spent Fuel Pool is designed to maintain a normal water level between 630' and 632' 6".~~

~~5.2.3 COOLING~~

~~The configuration of storage racks placed in the Spent Fuel Pool allows for adequate circulation of water to prevent localized pool boiling.~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

5.0 DESIGN FEATURES

Figure 5.1-1, BRP Site Map

FIGURE DELETE

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

5.0 DESIGN FEATURES

5.2.4 CAPACITY

~~Subject to the limits listed below, the fuel pool is designed for and shall be maintained with a storage capacity of no more than 441 fuel assemblies. In addition, fuel pins which have been removed from fuel assemblies shall be stored in the Spent Fuel Pool and shall be in a geometry which ensures subcriticality. The following limits apply to the amount of special nuclear material which may be stored in the Spent Fuel Pool:~~

- ~~□ 2500 kilograms of contained uranium 235.~~
- ~~□ 10.32 grams of uranium 235 as contained in fission counters.~~
- ~~□ 150 kilograms of plutonium contained in PuO₂-UO₂ fuel rods.~~
- ~~□ 5 curies of plutonium encapsulated as a plutonium beryllium source.~~

5.3 REACTOR

5.3.1 STATUS

~~The reactor is not licensed for power operation. Fuel shall not be placed in the reactor vessel.~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY AND AUTHORITY

6.1.1 SENIOR NUCLEAR OFFICER

The Senior Nuclear Officer shall be the Senior Vice President - Nuclear, Fossil, and Hydro Operations and shall be responsible for the overall operation, maintenance and decommissioning of the Big Rock Point nuclear power plant.

6.1.2 SITE GENERAL MANAGER

The Site General Manager shall be responsible for overall facility operation, maintenance and decommissioning and for periods of absence shall delegate in writing the succession to this responsibility. Unless otherwise specified, the Site General Manager's delegate has authority to perform all actions and grant approvals assigned by these specifications to the Site General Manager. The Site General Manager may delegate specific tasks to other individuals who may perform those tasks whether the Site General Manager is absent or present at the site.

~~6.1.3 SHIFT SUPERVISOR~~

~~The Shift Supervisor shall be responsible for the shift command function. This position will be filled by a Certified Fuel Handler.~~

6.2 ORGANIZATION

6.2.1 REPORTING RELATIONSHIPS

Onsite organization and corporate reporting relationship shall be established for activities affecting safety of the facility as described in the "Quality Program Description for Nuclear Power Plants, Part 1 - Big Rock Point (CPC-2A)".

a. ~~Lines of authority, responsibility and communication shall be established and documented in facility administrative procedures.~~

b. ~~The Site General Manager shall be responsible for safe operation of the facility and shall have control over those onsite activities necessary for safe operation and maintenance of the facility. The individual filling this position shall report directly to the Senior Nuclear Officer.~~

c. ~~The individuals who perform audits, surveillances and independent~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

~~safety reviews report to the Manager, Nuclear Performance Assessment Department.~~

- ~~d. The individuals who train the Certified Fuel Handlers and those who carry out radiation protection functions report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.~~

6.2.2 FACILITY ORGANIZATION

The Site General Manager or his designate shall verify that required security staffing and Dry Fuel Storage Technical Specifications have been met. ~~The facility organization shall be subject to the following:~~

- ~~a. Each on-duty shift shall be comprised of at least the minimum shift crew composition shown in Table 6.2-1.~~
- ~~b. At least one individual, who shall be qualified to stand watch in the MONITORING STATION, shall be in the MONITORING STATION when irradiated fuel is in the Spent Fuel Pool.~~
- ~~c. During operations without FUEL HANDLING either the SHIFT Supervisor or the Non-Certified Operator shall be qualified in radiation protection procedures; or a Radiation Protection Technician shall be on site. During FUEL HANDLING operations a qualified Radiation Protection Technician shall be on site.~~
- ~~d. When spent fuel is stored in the Spent Fuel Pool or during FUEL HANDLING operations, administrative procedures shall be implemented to limit the working hours of the facility staff who perform safety-related functions, and activities important to the safe storage of spent fuel (ISSSF) and the monitoring and control of radiological hazards (IMCRH). These individuals include the minimum SHIFT crew required by Table 6.2-1, key maintenance personnel and Radiation Protection Technicians.~~

~~Adequate SHIFT coverage shall be maintained without routine heavy use of overtime. However, in the event that unforeseen problems require substantial amounts of overtime to be used, the following guidelines shall be followed:~~

- ~~(1) An individual should not be permitted to work more than 16 hours straight, excluding SHIFT turnover time.~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

- (2) ~~An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding SHIFT turnover time.~~
- (3) ~~A break, including SHIFT turnover time, of at least 8 hours should be allowed after continuous work periods of 16 hours duration.~~

~~Any deviation from the above guidelines shall be authorized by the Site General Manager or designated alternates in accordance with established administrative procedures and with documentation of the basis for granting the deviation. Administrative procedures shall include a requirement for the Site General Manager or designated alternates to review individual overtime on a monthly basis in order to verify that excessive hours have not been assigned. Routine deviations from the above guidelines are not authorized.~~

TABLE 6.2-1: MINIMUM SHIFT CREW COMPOSITION
DURING PERMANENTLY DEFUELED CONDITION

POSITION	STAFFING FOR OPERATIONS WITHOUT FUEL HANDLING	STAFFING DURING FUEL HANDLING OPERATIONS
SHIFT Supervisor (CERTIFIED FUEL HANDLER)	1	1
Non-Certified Operator	1	1
CERTIFIED FUEL HANDLER		1
Radiation Protection Technician	1 ²	1

² - If Shift Supervisor or Non-Certified Operator are not certified in Radiation Protection Procedures

- e. ~~FUEL HANDLING operations shall be directly supervised by a CERTIFIED FUEL HANDLER who shall have no other concurrent responsibilities during this operation. CERTIFIED FUEL HANDLERS shall meet qualifications set forth in the CERTIFIED FUEL HANDLER Training Program.~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

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- ~~f. The SHIFT Supervisor shall be a CERTIFIED FUEL HANDLER.~~
- ~~g. The SHIFT Supervisor shall report to an individual who is CERTIFIED FUEL HANDLER.~~
- ~~h. Personnel requirements of (a) and (c) above may be less than the minimum specified for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty personnel provided immediate ACTION is taken to restore the minimum requirements specified. This provision only applies to on-SHIFT personnel and does not permit any SHIFT crew position to be unmanned upon SHIFT change due to oncoming SHIFT crew member being late or absent.~~

6.3 STAFF QUALIFICATIONS

Each member of the facility management and supervisory staff shall meet the minimum requirements of ANSI N18.1-1971 for comparable positions. The individual responsible for radiation protection functions shall meet the minimum requirements of Regulatory Guide 1.8, September 1975.¹

6.4 TRAINING

~~A training program for the facility's CERTIFIED FUEL HANDLERS shall meet the requirements and recommendations of Section 5.5 of ANSI N18.1-1971. The Site General Manager has overall responsibility for implementation and maintenance of the training program.~~

6.54 REVIEW AND AUDIT

- 6.54.1 Requirements for onsite and offsite reviews and audits are described in CPC-2A, Quality Program Description.

¹ As applied to this specification, "equivalent," as used in Regulatory Guide 1.8 for the bachelor's degree requirement, may be met with four years of any one or combination of the following: (a) formal training in science engineering or (b) operational or technical experience and training in nuclear power.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

6.65 PROCEDURES AND PROGRAMS

6.65.1 PROCEDURES

6.65.1.1 Scope

Written procedures shall be established, implemented and maintained for safety quality related ~~structures, systems components and safety actions~~ activities defined in the Big Rock Point Decommissioning Quality List and those ~~structures, systems, components and activities important to the safe storage of spent fuel (ISSSF) and monitoring and control of radiological hazards (IMCRH).~~ These procedures shall meet or exceed the requirements of ANSI N18.7-1976, as ~~endorsed~~ described by the Quality Program Description (CPC-2A).

Written procedures shall also be established, implemented, and maintained covering the following activities:

- a. ~~Defueled-ISFSI Security Plan;~~
- b. ~~Defueled-Emergency Plan;~~
- c. ~~Fire Protection Plan;~~
- ed. ~~Quality Program Description (CPC-2A); and,~~
- de. ~~All programs listed in Specification 6.6.2. Radiation Protection Program.~~

6.65.1.2 Review and Approval

Requirements for review and approval of procedures (and revisions thereto) required by this section are described in CPC-2A, Quality Program Description.

6.65.1.3 Temporary Changes

Requirements for making temporary changes to procedures which fall within the scope of this section are described in CPC-2A, Quality Program Description.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

6.65.2 PROGRAMS

The following programs shall have been established, implemented and maintained in accordance with written procedures meeting the requirements contained in Specification 6.65.1:

6.65.2.1 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.

6.65.2.21.1 High Radiation Area

6.65.2.21.1.1 Dose Rates less than or equal to 1000 Millirem per Hour

In lieu of the "control device" or "alarm signal" required by Paragraph 20.1601(a) of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than or equal to 1000 mrem/hr at 30 cm (12 inches) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by the use of a Radiation Work Permit (RWP). Radiation protection qualified personnel or personnel continuously escorted by radiation protection qualified personnel may be exempt from working under an RWP during the performance of their assigned radiation protection duties in high radiation areas with exposure rates of less than or equal to 1000 mrem/hr, provided they are otherwise following facility radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area, or
- 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 may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them, or
- c. A radiation protection qualified individual (e.g., Radiation Protection Technician) with a radiation dose rate monitoring device, responsible

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for providing positive control over the activities within the area.

6.65.2.21.1.2 Dose Rates greater than 1000 Millirem per Hour

In addition to the requirements of 6.65.2.21.1.1, areas accessible to personnel with radiation levels greater than 1000 mrem/hr at 30 cm (12 inches) but less than 500 rad/hr at 1 meter from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under administrative controls specified in the facility administrative procedures. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

For individual high radiation areas accessible to personnel with radiation levels greater than 1000 mrem/hr that are located within large areas where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

~~6.6.2.3 Process Control Program (PCP)~~

~~6.6.2.3.1 Changes to the PCP~~

~~Changes to the PCP shall become effective after approval by the Site General Manager.~~

~~6.6.2.3.2 Reports~~

~~Changes to the PCP shall be submitted to the Commission in the Radioactive Effluent Release Report for the period in which the changes were made effective. This submittal shall contain sufficiently detailed information to support the rationale for each change and a determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes.~~

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6.0 ADMINISTRATIVE CONTROLS

6.6.2.4 Offsite Dose Calculation Manual (ODCM)

6.6.2.4.1 Changes to the ODCM

Changes to the ODCM shall become effective after approval by the Site General Manager.

6.6.2.4.2 Reports

Changes to the ODCM shall be submitted to the Commission in the Radioactive Effluent Release Report for the period in which the changes were made effective. This submittal shall contain sufficiently detailed information to support the rationale for each change and a determination that the change did not reduce the accuracy or reliability of dose calculations or setpoint determinations.

6.6.2.5 Radioactive Effluent Controls Program

A program, conforming with 10 CFR 50.36a, for the control of radioactive effluents and for maintaining doses from radioactive effluents to members of the public as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by facility procedures, and (3) shall include remedial actions to be taken whenever program limits are exceeded. The program shall include the following elements:

- a. Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations conforming to 10 times the concentration values specified in Appendix B, Table 2, Column 2, to 10 CFR 20.1001 - 20.2402 for the radioactive material release in liquid effluents to unrestricted areas.
- 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;
- d. Limitations conforming to Appendix I to 10 CFR Part 50 on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from the facility to unrestricted areas;

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

- 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;
- f. Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50.
- g. The dose rate due to radioactive materials released in gaseous effluents from the site to areas at or beyond the site boundary shall be limited to the following:
 - (a) For noble gases: Less than or equal to 500 mrem/yr to the total body and less than or equal to 3000 mrem/yr to the skin, and
 - (b) For tritium and for all radionuclides in particulate form with half lives greater than 8 days: Less than or equal to 1500 mrem/yr to any organ.
- h. Limitations conforming to Appendix I to 10 CFR Part 50 on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the facility to areas beyond the site boundary; and
- i. Limitations conforming to 40 CFR Part 190 on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources.
- j. The dose to a member of the public from tritium and all radionuclides in particulate form with half lives greater than 8 days in gaseous effluents released to areas at or beyond the site boundary shall be limited to the following:
 - (a) During any calendar quarter: Less than or equal to 7.5 mrem to any organ, and
 - (b) During any calendar year: Less than or equal to 15 mrem to any organ.

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January 13, 2000

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6.0 ADMINISTRATIVE CONTROLS

6.6.2.6 Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the facility. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- a. Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM;
- b. A Land Use Census to ensure that changes in the use of areas at and beyond the site boundary are identified and that modifications to the monitoring program are made if required by the results of this census, or alternatively, that critical receptors are assumed to exist at the site boundary or offsite location of highest dose consequence; and
- c. Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

~~6.6.2.7 Fire Protection Program~~

~~A fire protection program meeting the requirements of 10 CFR 50.48(f) shall be established, implemented, and maintained.~~

~~6.6.2.8 Cold Weather Protection Program~~

~~This program provides administrative controls to ensure that appropriate measures are implemented and maintained during cold weather to protect the facility against cold temperatures which could impact the safe storage of irradiated fuel or result in unplanned or unmonitored radioactive material release.~~

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September 11, 2002

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

6.6.2.9 ~~Spent Fuel Pool Water Chemistry Program~~

~~This program uses procedures to provide controls for monitoring Spent Fuel Pool water chemistry. The Spent Fuel Pool Water Chemistry Program shall be established, implemented, and maintained whenever irradiated fuel is stored in the Spent Fuel Pool.~~

6.6.2.10 ~~Inservice Inspection and Testing Program~~

a. ~~Applicability~~

~~Applies to Inservice Inspection and Testing of ASME Code Class 1, Class 2 and Class 3 piping systems and components.~~

b. ~~Objective~~

~~To insure integrity of the Class 1, Class 2 and Class 3 piping systems and components.~~

c. ~~Specifications~~

1. ~~Inservice Inspection of ASME Code Class 1, 2 and 3 components and Inservice Testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i), and where provisions of Sections 11.4.1.4, 4.1.5 and 11.4.3.4 take precedence.~~

2. ~~Sufficient records of each inspection shall be kept to allow comparison and evaluation of future tests.~~

3. ~~The Inservice Inspection program shall be reevaluated as required by 10 CFR 50, Section 50.55a(g)(5) to consider incorporation of new inspection techniques that have been proven practical, and the conclusions of the evaluation shall be used as appropriate to update the inspection program.~~

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

6.76 REPORTING REQUIREMENTS

The reports identified in this section shall be submitted in accordance with 10 CFR 50.4.

6.76.1 ANNUAL OCCUPATIONAL RADIATION EXPOSURE REPORT

An annual report of radiation exposures received during the previous calendar year shall be submitted prior to March 1 of each year. This report shall tabulate the numbers of facility, utility and other personnel (including contractors) receiving exposures greater than 100 millirem during the year, along with their associated dose according to work and job functions, for example, operations and surveillance, routine maintenance, special maintenance (identify), and waste processing. The dose assignments to various duty functions may be estimated based on pocket dosimeter, TLD 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 dose received from external sources should be assigned to specific major work functions.

6.76.2 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

An annual radiological environmental operating report covering operation of the facility during the previous calendar year shall be submitted prior to May 1 of each year. The report shall include summaries, interpretations, and statistical evaluation 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 ODCM and Sections IV.B.2, IV.B.3 and IV.C of Appendix I to 10 CFR 50.

6.76.3 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

An annual radioactive effluent release report covering operation of the facility during the previous calendar year shall be submitted prior to May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the facility. The material provided shall be consistent with the objectives outlined in the ODCM and the PROCESS CONTROL PROGRAM, and shall comply with the requirements of 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

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6.0 ADMINISTRATIVE CONTROLS

6.76.4 SPECIAL REPORTS

The following special reports shall be submitted to the NRC as indicated.

- a. ~~If the water quality specifications of 3.1.1.c are exceeded, and the water quality cannot be recovered after one week, prepare a special report that identifies the causes and proposed corrective action(s) to ensure future water quality is in compliance and submit to the NRC by 31 days following entry into the LCO.~~
- b. If the sealed source contamination limits of Specification 3.4.1 are exceeded, a special report shall be submitted to the NRC within 30 days of identification of the existence of the excessive contamination. The report shall describe the equipment involved, the test results and corrective actions taken.
- e. ~~Inservice Inspection reports required by 10 CFR 50.55a and Section XI of the ASME Boiler and Pressure Vessel Code.~~

6.87 RECORDS

Record retention requirements are described in CPC-2A, Quality Program Description.

6.98 REPORTABLE EVENTS

A reportable event is any event or condition that must be reported to the NRC in accordance with 10 CFR 50.72, 10 CFR 50.73, or 10 CFR 50.9(b).

Attachment 4

Consumers Energy
BIG ROCK POINT
Docket Numbers 50-155 and 72-043

Replacement Pages
FACILITY OPERATING LICENSE
AND
DEFUELED TECHNICAL SPECIFICATIONS

(Originally submitted as Attachment 5 to August 6, 2003 Correspondence)
Revisions are Marked by a Double Line in the Right Margin

December 1, 2003

22 Pages

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555

CONSUMERS ENERGY COMPANY

DOCKET NO 50-155

BIG ROCK POINT PLANT

FACILITY OPERATING LICENSE

License No DPR-6

- I. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Consumers Power Company (renamed Consumers Energy Company by Amendment No. 119, the licensee) dated January 13, 1975, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. Construction of the Big Rock Point Plant (the facility) has been substantially completed in conformity with Construction Permit No. CPPR-9 and the application, as amended, the provisions of the Act and the rules and regulations of the Commission;
 - C. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - D. There is reasonable assurance: (i) that the activities authorized by this operating license can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the rules and regulations of the Commission;
 - E. The licensee is technically and financially qualified to engage in the activities authorized by this operating license in accordance with the rules and regulations of the Commission;
 - F. The licensee has satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;
 - G. The issuance of this operating license will not be inimical to the common defense and security or to the health and safety of the public; and

- H. The receipt, possession, and use of source, byproduct and special nuclear material as authorized by this license will be in accordance with the Commission's regulations in 10 CFR Parts 30, 40, and 70, including 10 CFR Sections 30.33, 40.32, and 70.23 and 70.31.
2. Facility Operating License No. DPR-6, issued to the Consumers Energy Company, is hereby amended in its entirety to read as follows:
- A. This license applies to the Big Rock Point Plant (the facility) owned by Consumers Energy Company (the licensee). The facility is located in Charlevoix County, Michigan, and is described in the licensee's application dated January 14, 1960, and the Final Hazards Summary Report, as supplemented, updated, and amended by subsequent filings by the licensee.
 - B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses Consumers Energy Company:
 - B.(1) Pursuant to Section 104b of the Act and 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities" to possess the facility at the designated location in Charlevoix County, Michigan, in accordance with the procedures and limitations set forth in this license;
 - B.(2) Pursuant to the Act and 10 CFR Part 70, "Domestic Licensing of Special Nuclear Material," to possess at any one time up to (a) 2500 kilograms of contained uranium 235 in fuel rods, (b) 10.32 grams of uranium 235 as contained in fission counters, (c) 150 kilograms of plutonium contained in PuO₂-UO₂ fuel rods, and (d) 5 curies of plutonium encapsulated as a plutonium-beryllium neutron source;
 - (a) Deleted
 - (b) Deleted
 - (c) Deleted
 - (d) Deleted
 - (e) Deleted
 - (f) Deleted
 - (g) Deleted
 - (3) Pursuant to the Act and 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of By-product Material," to receive, possess and use at any one time up to 7000 curies of antimony-beryllium in the form of neutron sources, 3.7 curies of cobalt-60 as sealed sources, 45 curies of cesium-137 as sealed sources, 10 microcuries of miscellaneous alpha emitting material as sealed sources, and up to 500 millicuries per nuclide of any byproduct material between atomic numbers 1 and 83, inclusive, without restriction as to chemical and physical form;

2.B.(4) Pursuant to the Act and 10 CFR Part 40, "Domestic Licensing of Source Material," to possess at any one time up to 500 kilograms of depleted uranium dioxide contained in the facility's fuel assemblies;

(5) Pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such by product and special nuclear materials as may be produced by the operation of the facility.

C. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

C.(1) Reactor Operation

The reactor is not licensed for power operation. Fuel shall not be placed in the reactor vessel.

C.(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No., xxx are hereby incorporated in the license. The licensee shall maintain the facility in accordance with the Technical Specifications.

C.(3) Physical Protection

The licensee shall fully implement and maintain in effect all provision of the physical security, guard training and qualification, and safeguards contingency plans approved by the Commission and all amendments and revisions to such plans made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p), as modified by NRC-approved exemptions. The plan, which contains Safeguards information protected under 10 CFR 73.21, is entitled: "Big Rock Point ISFSI Security Plan" Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

2.C.(4) Deleted

2.C.(5) Deleted

2.C.(6) Deleted

2.C.(7) Deleted

- D. The license amendment is effective as of the date of its issuance and shall be implemented within 45 days of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Signature
Name
TITLE

Attachment:
Change No. xxx to the
Technical Specifications

Date of Issuance: DATE

BIG ROCK POINT RESTORATION PROJECT

DEFUELED TECHNICAL SPECIFICATIONS

Amendment XXX
Date

DEFUELED TECHNICAL SPECIFICATIONS

FOR
BIG ROCK POINT PLANT
DOCKET 50-155

LIST OF EFFECTIVE PAGES

as of
AMENDMENT XXX
DATE

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LICENSE - Page 3	XXX	DATE
LICENSE - Page 4	XXX	DATE
Table of Contents (3 Pages)	XXX	DATE
<u>Section 1 - DEFINITIONS</u>		
Page 1-1	XXX	DATE
<u>Section 2 - SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS</u>		
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<u>Section 3 & 4 - LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS</u>		
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BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

1.0 DEFINITIONS

1.1 ACTION

ACTION shall be that part of a specification which prescribes remedial measures required under designated conditions.

1.2 CHANNEL CALIBRATION

A CHANNEL CALIBRATION is the adjustment as necessary, of the channel output such that the channel responds with the necessary range and accuracy to known values of the parameter which the channel monitors. The CHANNEL CALIBRATION shall encompass the entire channel including the sensor and alarm and/or trip functions, and includes the CHANNEL FUNCTIONAL TEST. The CHANNEL CALIBRATION may be performed by any series of sequential, overlapping, or total channel steps such that the entire channel is calibrated.

1.3 CHANNEL CHECK

A CHANNEL CHECK is the qualitative assessment of channel behavior during operation by observation. This assessment shall include, where possible comparison of the channel indication and/or status with other indications and/or status derived from independent instrumentation channels measuring the same parameter.

1.4 CHANNEL FUNCTIONAL TEST

A CHANNEL FUNCTIONAL TEST is the injection of a simulated signal into the channel as close to the sensor as practicable to verify performance, including alarm and trip functions.

1.5 IMMEDIATELY

When "IMMEDIATELY" is used as a completion time for a required ACTION, the ACTION should be pursued without delay and in a controlled manner.

1.6 REPORTABLE EVENT

A REPORTABLE EVENT is any of those conditions specified as reportable in Specification 6.8.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

2.0 SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

There are no safety limits or limiting safety system settings applicable to the permanently defueled condition.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.0 APPLICABILITY

LIMITING CONDITIONS FOR OPERATION

- 3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding specifications is required during the conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.
- 3.0.2 Noncompliance with a specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the ACTION requirements is not required.
- 3.0.3 Unless otherwise specified, entry into an applicability condition shall not be made unless the conditions of the associated Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements.

SURVEILLANCE REQUIREMENTS

- 4.0.1 Unless specified otherwise, Surveillance Requirements shall be applicable during the specified applicable conditions for the associated Limiting Conditions for Operation.
- 4.0.2 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.
- 4.0.3 Unless specified otherwise, performance of a Surveillance Requirement within the specified time interval including the maximum allowable extension shall constitute compliance with associated ACTION statements.
- 4.0.4 Unless specified otherwise, entry into a specified applicable condition shall not be made unless the Surveillance Requirements associated with the Limiting Condition for Operation have been performed within the stated surveillance interval including the maximum allowable extension.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

3/4.1 SEALED SOURCE CONTAMINATION

LIMITING CONDITIONS FOR OPERATION

- 3.4.1 Each sealed source containing more than 100 microcuries of beta and/or gamma emitting material, or more than 5 microcuries of alpha emitting material shall not have removable contamination which equals or exceeds 0.005 microcuries.

APPLICABILITY: At all times.

- ACTION:
1. Each sealed source with removable contamination in excess of the above limits shall be IMMEDIATELY withdrawn from use and either decontaminated and repaired, or disposed of in accordance with NRC regulations.
 - a. A special report shall be submitted to the NRC as indicated by Specification 6.6.4.a.

SURVEILLANCE REQUIREMENTS

- 4.4.1 Except for: 1) sealed sources which are stored and not in use, and 2) start up sources and fission detectors previously subjected to core neutron flux, sealed sources containing radioactive materials in any form other than gas and with a half-life greater than 30 days (excluding ${}^3\text{H}$) shall be tested for contamination and/or leakage at least once per six months by the licensee or other person specifically authorized by the NRC or an Agreement State to perform such services. The test method shall have a detection sensitivity of at least 0.005 microcuries per test sample. The test sample shall be taken from the sealed source or from the surfaces of the device in which the sealed source is permanently mounted or stored, on which one might expect contamination to accumulate. Records of leak test results shall be kept in units of microcuries and maintained for inspection by the NRC.
- a. Sealed sources requiring testing by this section, but exempted on the basis of not being in use, shall have been tested within 6 months prior to being transferred or put into use.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

5.0 DESIGN FEATURES

5.1 SITE

5.1.1 LOCATION AND BOUNDARIES

The plant site is located in Charlevoix County, Michigan, about 4 miles northeast of Charlevoix, Michigan, and about 11 miles west of Petoskey, Michigan.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY AND AUTHORITY

6.1.1 SENIOR NUCLEAR OFFICER

The Senior Nuclear Officer shall be the Senior Vice President - Nuclear, Fossil, and Hydro Operations and shall be responsible for the overall operation, maintenance and decommissioning of the Big Rock Point nuclear power plant.

6.1.2 SITE GENERAL MANAGER

The Site General Manager shall be responsible for overall facility operation, maintenance and decommissioning and for periods of absence shall delegate in writing the succession to this responsibility. Unless otherwise specified, the Site General Manager's delegate has authority to perform all actions and grant approvals assigned by these specifications to the Site General Manager. The Site General Manager may delegate specific tasks to other individuals who may perform those tasks whether the Site General Manager is absent or present at the site.

6.2 ORGANIZATION

6.2.1 REPORTING RELATIONSHIPS

Onsite organization and corporate reporting relationship shall be established as described in the Quality Program Description for Nuclear Power Plants Part 1 - Big Rock Point (CPC-2A).

6.2.2 FACILITY ORGANIZATION

The Site General Manager or his designate shall verify that required security staffing and Dry Fuel Storage Technical Specification surveillance(s) have been met.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

6.3 STAFF QUALIFICATIONS

Each member of the facility management and supervisory staff shall meet the minimum requirements of ANSI N18.1-1971 for comparable positions. The individual responsible for radiation protection functions shall meet the minimum requirements of Regulatory Guide 1.8, September 1975.¹

6.4 REVIEW AND AUDIT

Requirements for onsite and offsite reviews and audits are described in the Quality Program Description for Nuclear Power Plants Part 1- Big Rock Point (CPC-2A).

¹ As applied to this specification, "equivalent," as used in Regulatory Guide 1.8 for the bachelor's degree requirement, may be met with four years of any one or combination of the following: (a) formal training in science engineering or (b) operational or technical experience and training in nuclear power.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

6.5 PROCEDURES AND PROGRAMS

6.5.1 PROCEDURES

6.5.1.1 Scope

Written procedures shall be established, implemented and maintained for quality related activities defined in the Big Rock Point Decommissioning Quality List and shall meet or exceed the requirements described by the Quality Program Description (CPC-2A).

Written procedures shall also be established, implemented, and maintained covering the following activities:

- a. ISFSI Security Plan;
- b. Emergency Plan;
- c. Fire Protection Plan;
- d. Quality Program Description (CPC-2A); and
- e. Radiation Protection Program.

6.5.1.2 Review and Approval

Requirements for review and approval of procedures (and revisions thereto) required by this section are described in CPC-2A, Quality Program Description.

6.5.1.3 Temporary Changes

Requirements for making temporary changes to procedures which fall within the scope of this section are described in CPC-2A, Quality Program Description.

6.5.2 PROGRAMS

The following programs shall be established, implemented and maintained in accordance with written procedures meeting the requirements contained in Specification 6.5.1.

6.5.2.1 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.

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

6.5.2.1.1 High Radiation Area

6.5.2.1.1.1 Dose Rates less than or equal to 1000 Millirem per Hour

In lieu of the "control device" or "alarm signal" required by Paragraph 20.1601(a) of 10 CFR Part 20, each high radiation area in which the intensity of radiation is greater than 100 mrem/hr but less than or equal to 1000 mrem/hr at 30 cm (12 inches) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by the use of a Radiation Work Permit (RWP). Radiation protection qualified personnel or personnel continuously escorted by radiation protection qualified personnel may be exempt from working under an RWP during the performance of their assigned radiation protection duties in high radiation areas with exposure rates of less than or equal to 1000 mrem/hr, provided they are otherwise following facility radiation protection procedures for entry into such high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area, or
- 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 may be made after the dose rate levels in the area have been established and personnel have been made knowledgeable of them, or
- c. A radiation protection qualified individual (e.g., Radiation Protection Technician) with a radiation dose rate monitoring device, responsible or providing positive control over the activities within the area.

6.5.2.1.1.2 Dose Rates greater than 1000 Millirem per Hour

In addition to the requirements of 6.5.2.1.1.1, areas accessible to personnel with radiation levels greater than 1000 mrem/hr at 30 cm (12 inches) but less than 500 rad/hr at 1 meter from the radiation source or from any surface which the radiation penetrates shall be provided with locked doors to prevent unauthorized entry, and the keys shall be maintained under administrative controls specified in the facility administrative procedures. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area. In lieu of a stay time specification, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by personnel qualified in radiation protection procedures to provide positive exposure control over the activities

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

For individual high radiation areas accessible to personnel with radiation levels greater than 1000 mrem/hr that are located within large areas where no enclosure exists for purposes of locking, and no enclosure can be reasonably constructed around the individual areas, then that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

6.6.2.3 Process Control Program (PCP)

6.6.2.3.1 Changes to the PCP

Changes to the PCP shall become effective after approval by the Site General Manager.

6.6.2.3.2 Reports

Changes to the PCP shall be submitted to the Commission in the Radioactive Effluent Release Report for the period in which the changes were made effective. This submittal shall contain sufficiently detailed information to support the rationale for each change and a determination that the change did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes

6.6.2.4 Offsite Dose Calculation Manual (ODCM)

6.6.2.4.1 Changes to the ODCM

Changes to the ODCM shall become effective after approval by the Site General Manager.

6.6.2.4.2 Reports

Changes to the ODCM shall be submitted to the Commission in the Radioactive Effluent Release Report for the period in which the changes were made effective. This submittal shall contain sufficiently detailed information to support the rationale for each change and a determination that the change did not reduce the accuracy or reliability of dose calculations or setpoint determinations.

6.6.2.5 Radioactive Effluent Controls Program

A program, conforming with 10 CFR 50.36a, for the control of radioactive effluents and for maintaining doses from radioactive effluents to members of the public as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by facility procedures, and (3) shall include remedial actions to be taken whenever program limits are exceeded. The program shall include the following elements:

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

- a. Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations conforming to 10 times the concentration values specified in Appendix B, Table 2, Column 2, to 10 CFR 20.1001 - 20.2402 for the radioactive material release in liquid effluents to unrestricted areas.
- 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;
- d. Limitations conforming to Appendix I to 10 CFR Part 50 on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from the facility to unrestricted areas;
- 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;
- f. Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50.
- g. The dose rate due to radioactive materials released in gaseous effluents from the site to areas at or beyond the site boundary shall be limited to the following:
 - (a) For noble gases: Less than or equal to 500 mrem/yr to the total body and less than or equal to 3000 mrem/yr to the skin, and
 - (b) For tritium and for all radionuclides in particulate form with half lives greater than 8 days: Less than or equal to 1500 mrem/yr to any organ.
- h. Limitations conforming to Appendix I to 10 CFR Part 50 on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the facility to areas beyond the site boundary; and
- i. Limitations conforming to 40 CFR Part 190 on the annual dose or dose commitment to any member of the public due to releases of radioactivity and to radiation from uranium fuel cycle sources.
- j. The dose to a member of the public from tritium and all radionuclides in particulate form with half lives greater than 8 days in gaseous effluents

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

released to areas at or beyond the site boundary shall be limited to the following:

- (a) During any calendar quarter: Less than or equal to 7.5 mrems to any organ, and
- (b) During any calendar year: Less than or equal to 15 mrems to any organ.

6.6.2.6 Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the facility. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- a. Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM;
- b. A Land Use Census to ensure that changes in the use of areas at and beyond the site boundary are identified and that modifications to the monitoring program are made if required by the results of this census, or alternatively, that critical receptors are assumed to exist at the site boundary or offsite location of highest dose consequence; and
- c. Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

6.6 REPORTING REQUIREMENTS

The reports identified in this section shall be submitted in accordance with 10 CFR 50.4.

6.6.1 ANNUAL OCCUPATIONAL RADIATION EXPOSURE REPORT

An annual report of radiation exposures received during the previous calendar year shall be submitted prior to March 1 of each year. This report shall tabulate the numbers of facility, utility and other personnel (including contractors) receiving exposures greater than 100 millirem during the year, along with their associated dose according to work and job functions, for example, operations and surveillance, routine maintenance, special

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

maintenance (identify), and waste processing. The dose assignments to various duty functions may be estimated based on pocket dosimeter, TLD 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 dose received from external sources should be assigned to specific major work functions.

6.6.2 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

An annual radiological environmental operating report covering operation of the facility during the previous calendar year shall be submitted prior to May 1 of each year. The report shall include summaries, interpretations, and statistical evaluation 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 ODCM and Sections IV.B.2, IV.B.3 and IV.C of Appendix I to 10 CFR 50.

6.6.3 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

An annual radioactive effluent release report covering operation of the facility during the previous calendar year shall be submitted prior to May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the facility. The material provided shall be consistent with the objectives outlined in the ODCM and the PROCESS CONTROL PROGRAM, and shall comply with the requirements of 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

6.6.4 SPECIAL REPORTS

The following special reports shall be submitted to the NRC as indicated.

- a. If the sealed source contamination limits of Specification 3.4.1 are exceeded, a special report shall be submitted to the NRC within 30 days of identification of the existence of the excessive contamination. The report shall describe the equipment involved, the test results and corrective actions taken.

6.7 RECORDS

Record retention requirements are described in the Quality Program Description for Nuclear Power Plants Part 1- Big Rock Point (CPC-2A).

BIG ROCK POINT DEFUELED TECHNICAL SPECIFICATIONS

6.0 ADMINISTRATIVE CONTROLS

6.8 REPORTABLE EVENTS

A reportable event is any event or condition that must be reported to the NRC in accordance with 10 CFR 50.72, 10 CFR 50.73, 10 CFR 50.9(b), or 10 CFR 72.75.