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To: "twa@nrc.gov" <twa@nrc.gov>
Date: 10/15/03 6:11PM
Subject: Draft copy of RAI for ANO2 TS

Tom,

Attached is a draft copy of the response to the RAIs and additional proposed changes as related to the ANO-2 TS Section 6.0 amendment change.

Dana

Mail Envelope Properties (3F8DC5CD.EF3 : 22 : 3827)

Subject: Draft copy of RAI for ANO2 TS
Creation Date: 10/15/03 6:06PM
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Letter Number

Date

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

SUBJECT: Supplement to Amendment Request
Related to the Revision of Section 6.0, Administrative Controls
Arkansas Nuclear One, Unit 1 (ANO-1)
Docket No. 50-368
License No. NPF-6

REFERENCES: 1. Entergy letter dated June 30, 2003, License Amendment Request Revision of Section 6.0, Administrative Controls (2CAN060303)

Dear Sir or Madam:

By letter (Reference 1), Entergy Operations, Inc. (Entergy) proposed a change to the Arkansas Nuclear One, Unit 2 (ANO-2) Technical Specifications (TSs) to: 1) reorganize Section 6.0, Administrative Controls; 2) modify the actions and surveillance requirements (SRs) of various other TSs to support the reorganization; 3) modify several action and SRs that are related to systems that are shared by ANO-2 and ANO, Unit 1 (ANO-1); and 4) change various TS bases as needed to support the above changes.

On September 26, 2003, Entergy received 12 questions which were determined to need formal response. Entergy's response is contained in Attachment 1.

In addition, Entergy is proposing two changes that were not included in the previous submittal (Reference 1). One change will increase the minimum fuel volume specified in TS 3.8.1.1.b and 3.8.1.2.b for the emergency diesel generator day tank. The other change corrects a typographical error. These changes are described in Attachment 1.

Two TS amendments (249 and 251), which have been approved since Entergy submitted the original proposed changes in Reference 1, affect pages that were submitted with Reference 1. New marked up and clean pages are included in Attachments 2 and 3 based on the approval of these two amendments.

The original no significant hazards consideration (NSHC) included in Reference 1 is affected by information contained in this supplemental letter. One additional less restrictive change has been identified and is included in the updated NSHC. One change that was classified as less restrictive is being reclassified as a more restrictive change.

Letter #
Page 2 of 2

The list of commitments included in the previous submittal (Reference 1) is being revised. One of the commitments stated in part that the details of the Ventilation Filter Testing Program (VFTP) will be relocated to the TRM. The details of the VFTP will be maintained in site procedures. Another commitment is changed to include the relocation of details related to the change proposed to the facility operating license condition 2.c.(6). A complete list of the commitments, as modified, is included as Attachment 4.

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

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

Sincerely,

Craig G. Anderson

CGA/dm

Attachments:

1. Response to Request For Additional Information
2. Revised Markup of Technical Specification Pages
3. Revised Clean Copy of Technical Specification Pages
4. List of Regulatory Commitments

cc: Mr. Bruce Mallett
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Attachment 1

To

Letter #

Response to Request for Additional Information

**Response to Request for Additional Information Related to
the Revision of Section 6.0, Administrative Controls**

Question 1:

The current wording in 2CTS Table 3.3-1 Action 2 and 2CTS Table 3.3-3 Action 10 states in part "shall be reviewed at the next regularly scheduled PSC meeting in accordance with the QA Manual Operations." The wording in PTS Table 3.3-1 Action 2 and PTS Table 3.3-3 Action 10 is changed to "shall be reviewed as soon as possible but no later than the next regularly scheduled OSRC meeting in accordance with the Quality Assurance Program Manual (QAPM)." As currently written the 2CTS statement would require that a review of the desirability of maintaining a channel in the bypassed condition for greater than 48 hours is required at the next "scheduled" PSC meeting and could not be performed at a "called" meeting held before the next "schedule" meeting. If this review were performed prior to the next "scheduled" meeting, the intent would still be satisfied. While the staff finds the change acceptable, it does not believe the change is an administrative change. The change is a less restrictive (L) change, since it would allow any PSC/OSRC meeting prior to the next scheduled meeting to review the desirability of maintaining the change in the bypass condition. Comment: Provide a discussion and justification for this less restrictive (L) change.

Response 1:

The proposed change will be considered less restrictive and classified as L16. The current requirement to review the desirability of maintaining a channel in a bypassed condition at the next scheduled On Site Safety Review Committee (OSRC) meeting is excessive, as it does not provide the flexibility to perform the review sooner than the next regularly scheduled meeting. The proposed change allows the option to review the desirability of maintaining a channel in a bypassed condition prior to or at the next scheduled OSRC meeting. The review is adequately performed regardless of the timing of the meeting. New marked up pages are included. No changes are proposed to the clean pages, which were submitted to the NRC by Entergy letter dated June 30, 2003.

Question 2:

2CTS Table 4.3-3 Item 2.b is modified by Note 6. The note provides a three (3) hour time period with the monitor inoperable to conduct the CHANNEL FUNCTIONAL TEST without entering the associated Actions. DOC L.2 states that the note was first included NUREG-1432, revision 0 by the lead plant that converted to ITS. This statement is in error NUREG-1432 does not allow this relaxation. The current reference is NUREG-1432, Rev 0. Comment: Correct this discrepancy.

Response 2:

Discussion of Change (DOC) L2 is corrected below:

L2 Note 6 will be added to current Technical Specification (CTS) Table 4.3-3. The note provides a three (3) hour time period with the monitor inoperable to conduct the CHANNEL FUNCTIONAL TEST without entering the associated Actions. This note

was first included in NUREG-1430, revision 0 by the lead plant that converted to the improved Technical Specification (ITS). The time allowance was based on the historical average time frame for conducting the test and the need to conduct the test during conditions for which the monitor is normally required to be OPERABLE. The note was approved for inclusion in the Arkansas Nuclear One, Unit 1 (ANO-1) ITS conversion and as such provides precedence for this request. When performing the channel functional test on the radiation monitors, the monitors' intended function of isolating the control room and starting the appropriate emergency ventilation system is demonstrated. Therefore, it is necessary that while performing the test the control room not be in the emergency ventilation mode as might be required by actions associated with inoperable monitors.

Question 3:

In converting 2CTS 4.7.6.1.2.d.2 to PTS 4.7.6.1.2.b the words "either actual or simulated" were added to allow actuation signals to be used to satisfy the surveillance requirement. This was justified by Doc L.11. This change is acceptable; however, the change was incomplete. 2CTS 4.7.6.1.2.d.2 specifies that the "control room high radiation test signal" is to be used. These words were not changed in converting to PTS 4.7.6.1.2.b. Thus the word "test" would still restrict the surveillance to a simulated signal. The word "test" should be deleted so that it will be consistent with ANO-1 SR 3.7.9.3. Comment: Correct this discrepancy.

Response 3:

The word "test" will be removed. Surveillance Requirement (SR) 4.7.6.1.2.b will be worded: "At least once per 18 months by verifying that on a control room high radiation signal, either actual or simulated, the system automatically isolates the control room and switches into a recirculation mode of operation." A minor change is proposed to DOC L.11, which was included in Entergy's letter to the NRC dated June 30, 2003, License Amendment Request Revision of Section 6.0, Administrative Controls (2CAN060303). New marked up and clean pages are included in Attachments 2 and 3 respectively.

L11 SR 4.7.6.1.2.d.2 will be relocated to SR 4.7.6.1.2.b and an option to verify the system automatically isolates by using either an actual or a simulated signal. This allows satisfactory automatic system initiations for other than surveillance purposed to be used to fulfill the surveillance requirements. OPERABILITY is adequately demonstrated in either case since the system cannot discriminate between "actual" or "simulated" signals.

Question 4:

As stated in RAI 3/4 7-3 a mistake was made in converting 1CTS 4.10.1.a and 4.10.2.a to ITS SR 3.7.9.1 and SR 3.7.10.1 in that the phrase "STAGGERED TEST BASES" was relocated to the ITS Bases by ANO-1 DOC LA.1. It was also stated in RAI 3/4.7-3 that the format and structure of the ITS/STS and 10CFR50.36(s) do not allow the Bases to dictate licensing requirements, particularly frequency requirements. Thus the frequency to perform ITS SR 3.7.9.1 and SR 3.7.10.1 is 31 days with no legal requirement to stagger the tests. In

oil system not within limits. PTS 3.8.1.3 Actions 2 and 3 specify that remedial measures to be taken when the diesel fuel oil properties specified in the program (PTS 6.5.13) are not within limits. However, there is no corresponding surveillance requirement for these Action statements similar to ITS SR 3.8.3.2. Comment: Revise the CTS/PTS markup of 2CTS 4.8.1.1.2 and PTS 3/4 8.1.3 to include a SR similar to ITS SR 3.8.3.2 and provide the appropriate justification and discussion for this administrative change.

Response 5:

A new SR will be added as SR 4.8.3.1.2. The SR will state: "Verify fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of the Diesel Fuel Oil Testing Program." The frequency of performance will be in accordance with the Diesel Fuel Oil Testing Program, which is PTS 6.5.13. The proposed change is administrative and will be classified as A36. The proposed SR provides a link to assure the proposed diesel fuel oil testing program is implemented. PTS SR 4.8.3.1 will be renumbered as SR 4.8.3.1.1 to accommodate the new SR.

Question 6:

DOC M.8 describes and justifies the changes made in converting 2CTS 6.8.1.d to PTS 6.4.1.d. DOC M.8 states the following: "Written procedures for the ODCM will be required by PTS 6.4.d." The PTS does not contain a specification 6.4.d. Comment: Correct this discrepancy.

Response 6:

The section that should have been referenced is PTS 6.4.1.d. DOC M8 is corrected as follows:

M8 PTS 6.4.1.d – Requirements will be included to provide procedures for each of the programs identified in PTS 6.5. The proposed change is consistent with the NUREGs and is an additional restriction on unit operation. CTS 6.8.1.i, ODCM and PCP implementation will be relocated to the Programs section. Written procedures for the ODCM will be required by PTS 6.4.1.d. Therefore, the ODCM and PCP do not need to be listed separately in section 6.4.

Question 7:

A number of changes were made in converting 2CTS 6.8.4.a.5 to PTS 6.5.4.e. The justification used for these changes DOC A.35 states that they are acceptable because they are consistent with TSTF-308. As stated in RAI 1.0-1 "Consistency with the ITS or STS is not an adequate justification for concluding a change is acceptable....This also implies to any changes made as a result of TSTF's (i.e., TSTF-287)." Comment: Revise the discussion and justification for this administrative change in light of the above discussion and RAI 1.0-1.

Response 7:

The proposed change is an administrative change that provides clarity to the intended requirements for determining cumulative and projected dose contributions. Cumulative dose contributions are determined for the current calendar quarter and the current calendar year. However, the projected doses are not determined for an entire calendar quarter or calendar year. Therefore, the change provides clarity. In addition, the CTS wording states that the dose contributions will be determined using the methodology and parameters in the ODCM. The proposed change eliminates the word "parameters" from the sentence related to projected dose. There is no practical difference between "methodology and parameters" and "methodology." The change will continue to be classified as A35 with the addition of the above justification.

Question 8:

RAI 6.0-30 requested additional justification and discussion on the relocation of that portion of 2CTS 6.9.1.5.c related to the reporting requirements for the LTOP safety valve challenges. DOC LA.3 restated that this commitment was part of Amendment 180 dated March 7, 1997, and that this commitment is being deleted using the allowances of the Commitment Management Program. The allowances contained in the Commitment Management Program are an unacceptable justification from removal of a TS commitment. Comment: Provide a justification and discussion on the deletion of the reporting requirement for LTOP safety valve challenges.

Response 8:

Entergy is not removing an operating license change by the proposed revision, but to only make the change consistent with the current NUREG 1432 guidance. When the commitment to report LTOP relief valve actuations was made as reported in the safety evaluation for Amendment 180 to the ANO-2 Operating License, no actual change to the ANO-2 TSs was made. Therefore, the commitment deletion performed by Entergy for the LTOP reporting commitment did not change the TSs.

SECY-95-300 endorsed the Nuclear Energy Institute's Guidance Document, "Guideline for Managing NRC Commitments." The NEI Guidance document was updated in July 1999 as NEI 99-04, "Guidelines for Managing NRC Commitment Changes." The guidance document, which is reflected in Entergy's Commitment Management Program, allows the deletion of commitments that were specific statements in NRC safety evaluation reports which credited specific licensee commitments as being the basis for an NRC staff safety conclusion. The process states that if the commitment has been implemented, that the licensee can notify the NRC in a summary report. Changes to commitments are summarized to the NRC in ANO's Annual Operating Report.

The reporting of challenges to pressurizer safety valves per TS 6.9.1.5.c is not directly related to the commitment for reporting of LTOP actuations. However, at the time that the commitment was being made NUREG 1432 included the report for challenges to pressurizer safety valves. The commitment to report challenges to the LTOPs was related to this reporting requirement only to define the basis / schedule for the report. In 1997, the NRC issued Generic Letter (GL) 97-02, "Revised Contents of the Monthly Operating Report." The

GL did not specifically identify the need to report challenges to the pressurizer safety and relief valves. The bases for deleting the commitment to report challenges to the LTOP safety valves is consistent with the absence of need to report challenges to the pressurizer safety and relief valves.

Question 9:

2CTS 6.9.5.1.13 through 6.9.5.1.16 reference the NRC approval letters for the methodologies specified in 2CTS 6.9.5.1.4, 6.9.5.1.5, 6.9.5.1.6, 6.9.5.1.8, 6.9.5.1.9, and 6.9.5.1.11. In converting the CTS to the PTS the above methodology references were changed to 6.6.5.4, 6.6.5.5, 6.6.5.6, 6.6.5.8, 6.6.5.9, and 6.6.5.11, respectively. These reference specifications are in error; the correct specifications are 6.6.5.b.4, 6.6.5.b.5, 6.6.5.b.8, 6.6.5.b.9, and 6.6.5.b.11, respectively. Comment: Correct this error.

Response 9:

See corrected pages in Attachments 2 and 3.

Question 10:

In converting FOL 2.C.(5) to PTS 6.5.2 the phrase "at a frequency not to exceed refueling cycle intervals" is changed to "at least once per 18 months." This change is justified by DOC L.14. Based on the justification provided in DOC L.14, refueling cycle intervals are defined as 18 months which is consistent with current requirements, thus the change should be considered as an administrative change. However, this change is based on the same change made by TSTF-299. TSTF-299 justifies and classifies this change as a More restrictive change. The reason for this is that even through a refueling cycle interval may be defined at ANO-2 as 18-months, when one factors in the startups, shutdowns, and down time for maintenance and repairs during this interval, the time may exceed 18 months plus the 25% allowance allowed by 2CTS 4.0.2. Thus restricting the time interval to "at least once per 18 months" is a More restrictive change. Comment: Revise the CTS markup and provide a justification and discussion for this More restrictive change.

Response 10:

The CTS markup will be revised to classify this as a more restrictive change and designate it as M15. The proposed change results in consistency with the surveillance test frequency notation that is included in other ANO-2 Technical Specification Surveillance Requirements. A new marked up page is included in Attachment 3.

Question 11:

DOC L.1 justifies the change made in converting 2CTS 4.8.1.1.2.b to PTS 6.5.13.c. The last sentence for DOC L.1 states the following: "The periodic testing..stored DG fuel oil will support SG operability." The DG fuel oil does not support steam generator (SG) operability, but it does support diesel generator (DG) operability. Comment: Correct this discrepancy.

Response 11:

Doc L1 is corrected as follows:

- L1 PTS 6.5.13.c will require the periodic testing of stored fuel for particulates only. Refer to M1 for added testing requirements. This change reflects industry standard acceptable diesel generator (DG) fuel oil testing programs reflected in NUREG-1432. Over the storage life of ANO-2 fuel oil, the properties tested by ASTM-D975 are not expected to change and performing these tests once on the new fuel oil (see M1) provides adequate assurance of the proper quality fuel oil. The periodic testing for particulates monitors a parameter that reflects degradation of fuel oil and can be trended to provide increased confidence that the stored DG fuel oil and can be trended to provide increased confidence that the stored DG fuel oil will support DG operability.

Question 12:

In converting FOL 2.c.(6) to PTS 6.5.2 the markup shows that the phrase "in vital areas" is relocated by DOC LA.2. DOC LA.2 lists specific CTS requirements that are being relocated to license controlled documents and the specific documents to which they are being relocated. No such entry is provided in DOC LA.2 for the relocation associated with FOL 2.c.(6). Comment: Revise DOC LA.2 to include this information.

Response 12:

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

<u>CTS Location</u>	<u>New Location</u>
FOL2.c.(6)	SAR
4.7.6.1.2.a	Bases, SR 4.7.6.1.2.a
4.7.6.1.2.d.2	Bases, SR 4.7.6.1.2.b
6.9.1.1	TRM
6.9.1.2	TRM
6.9.1.3	TRM

Additional Changes

- 1.0 The following change to CTS 3.8.1.1.b.1 and 3.8.1.2.b.1, which was not included in the original requested change, is being proposed. New marked up and clean pages are included.

Discussion of Changes

In addition to the previously proposed changes to the limiting condition for operation (LCO) of these two TSs, a change is proposed to the minimum fuel volume in the diesel generator day tanks. The proposed change will increase the minimum contained volume in the day tank from 280 gallons to 300 gallons.

Administrative Changes

None

Technical Changes – More Restrictive

- M16 Using a conservative fuel consumption rate, the minimum usable required capacity of each day tank is 263.4 gallons. Each day tank has an unusable volume of 29.4 gallons. Therefore, to assure at least 60 minutes of diesel operation at 110% rated capacity, the minimum contained volume in each day tank should be 292.8 gallons (263.4 + 29.4). The proposed change will conservatively require a minimum volume of 300 gallons in each day tank.

Technical Changes – Less Restrictive

None

Technical Changes – Removal of Details

None

Discussion of Differences

The diesel day tanks are specific to ANO-2 and are not shared with ANO-1 and therefore no comparison is made to the ANO-1 TS or to NUREG-1432.

- 2.0 An administrative change is proposed to TS 3.8.1.1, Action c.4. The change is a correction of a typographical error introduced in TS Amendment 249. The action in part states: "Restore the remaining inoperable A.C. Source to an OPERABLE status (Offsite A.C. Circuit within 72 hours or Diesel Generator with 14 days..." The proposed change will change the portion of the action from "with 14 days" to "within 14 days." The change is classified as A1, administrative. Revised marked up and clean pages are included in Attachments 2 and 3, respectively.
- A1 The designated change represents a non-technical, non-intent change. Examples of this type of change include: wording preference; convention adoption; editorial, numbering and formatting changes; and hierarchy structure.

converting 2CTS 4.7.6.1.1.a and 4.7.6.1.2.a to PTS 4.7.6.1.1.a and 4.7.6.1.2.a, the phase "STAGGERED TEST BASES" was not relocated to the Bases, but retained in the PTS; thus the PTS requires that the SRs be performed on a STAGGERED TEST BASES. This inconsistency between the two specification (ITS and PTS) could cause confusion and misinterpretation on the performance of the SRs and Actions to be taken due to missed surveillances, frequency extensions, and system inoperabilities. Comment: Correct this discrepancy.

Response 4:

The ITS definition of "STAGGERED TEST BASIS" is:

"A STAGGERED TEST BASIS shall consist of the testing of one of the systems, subsystems, channels or other designated components during the interval specified by the Surveillance Frequency, so that all systems, subsystems, channels or other designated components are tested during n Surveillance Frequency intervals, where n is the total number of systems, subsystems, channels, or other designated components in the associated function."

The ANO-2 CTS definition, which was not proposed for change, states:

"A STAGGERED BASIS shall consist of:

- a. A test schedule for n systems, subsystems, trains or other designated components obtained by dividing the specified test interval into n equal subintervals,
- b. The testing of one system, subsystem, train or other designated component at the beginning of each subinterval."

There are two control room air conditioning units (2VUC-27A and 2VUC-27B) which are tested to meet PTS SR 4.7.6.1.1.a and two control room emergency air filtration systems (VSF-9 and 2VSF-9) which are tested to meet PTS SR 4.7.6.1.2.a. The surveillance frequency is 31 days. The ANO-1 SR, as converted, requires each control room ventilation system (2VUC-27A, 2VUC-27B, VSF-9 and 2VSF-9) to be tested every 31 days. Based on the ANO-2 CTS definition of STAGGERED TEST BASIS, both 2VUC-27A and 2VUC-27B will be tested within the 31 day surveillance interval and both VSF-9 and 2VSF-9 will be tested within the 31 day surveillance interval.

Because the definition of STAGGERED TEST BASIS differs between ITS and the ANO-2 CTS, it is appropriate to leave STAGGERED TEST BASIS in the ANO-2 PTS, which is consistent with the testing requirements reflected in the ANO-1 TS. In both the ANO-1 SRs and the proposed ANO-2 SRs, all fans are tested every 31 days.

Question 5:

In converting 2CTS 4.8.1.1.2.a.2 and 4.8.1.1.2.b to the PTS, two new specifications were added: PTS 6.5.13 describes the diesel fuel oil testing program and its requirements, and PTS 3/4 8.1.3 provides the Limiting Conditions for Operation and Actions for the diesel fuel

- 3.0 TS Amendments 249 and 251, which were approved after the original submittal, affect two TSs and several pages of the original submittal. New marked up and clean pages are included in Attachments 2 and 3, respectively.

Revised No Significant Hazards Consideration

(Note: The previous item identified as number 13 in the list of less restrictive changes has been deleted and the remaining list renumbered; a new item, identified as number 14, is included. A minor change is being made to item number 3.)

Entergy Operations, Inc. proposes to change the Arkansas Nuclear One, Unit 2 (ANO-2) Technical Specifications (TSs) to reformat, reword, and relocate several specifications and surveillance requirements (SRs) from their current location in the TSs to another location in the TSs. The changes have been classified as administrative (A); less restrictive, administrative deletion of requirements (LA); more restrictive (M); and less restrictive (L).

Administrative Changes:

Rewording and reformatting various TSs will make the TSs more readily understandable to plant operators and other users. Relocation of the specifications will assist in consistency between ANO-2 and ANO, Unit 1 (ANO-1). During the reformatting and rewording process, no technical changes (either actual or interpretational) to the Technical Specifications were made unless they were identified and justified.

Less Restrictive – Administrative Deletion of Requirements

Portions of some specifications provide information that is descriptive in nature regarding the equipment, system(s), actions or surveillances. This information is proposed to be deleted from the specifications and relocated to other license basis documents or procedures which are under licensee control. The license bases documents may include the TS Bases, Safety Analysis Report (SAR), Technical Requirements Manual, and Program and Manuals identified in TS Section 6.0, "Administrative Controls." The removal of descriptive information is permissible, because the documents containing the relocated information will be controlled through the applicable process provided by the regulatory requirements, e.g., 10 CFR 50.59, 10 CFR 50.54(a)(3), and TS Section 6.0, "Administrative Controls." This will not impact the actual requirements but may provide some flexibility in how the requirement is conducted. Therefore, the descriptive information that has been moved continues to be maintained in an appropriately controlled manner.

More Restrictive Changes

The ANO-2 TSs are proposed to be modified in some areas to impose more stringent requirements than previously required. These more restrictive modifications are being imposed to be consistent with the currently improved ANO-1 TSs and the *Standard Technical Specifications Combustion Engineering Plants* (NUREG-1432).

Less Restrictive Changes

Less restrictive changes that are proposed include the following: (L# in parenthesis is the related explanation in the proposed submittal.)

- 1) A three (3) hour allowance to perform the channel functional test on the control room radiation monitors without entering the associated Actions. (L2)
- 2) An allowance to permit the control room boundary to be opened intermittently under administrative controls and to allow both Control Room Emergency Ventilation System (CREVS) trains to be inoperable for 24 hours if inoperability is due to the control room boundary being inoperable. (L3)
- 3) An allowance to use a simulated or actual signal when testing the automatic isolation feature of the control room air filtration system. (L11)
- 4) An allowance for the diesel fuel storage tanks to contain less than 22,500 gallons of fuel for up to 48 hours as long as the individual tank volume is greater than 17,446 gallons. The lower value when summed with the contents of the other tank ensures six days of fuel oil is available. During the 48 hours, the diesel generator is capable of performing its intended function. There is a low probability that an event would occur for which the diesel generator would be required during this short period of time when the lower fuel oil volume is allowed. (L4)
- 5) Seven days will be allowed to restore the stored diesel fuel oil total particulates to within the required limits prior to declaring the associated diesel inoperable. The presence of particulates does not mean the fuel oil will fail to burn properly in the diesel engine. In addition, particulate concentration is unlikely to change significantly between surveillance intervals (31 days). (L5)
- 6) An allowance for the person who is satisfying the requirement of the radiation protection staff position and for the person filling the Shift Technical Advisor (STA) position to be vacant for not more than two hours in order to provide for unexpected absences. This is consistent with the allowance permitted for the control room operator as reflected in existing TSs. (L6 and L8)
- 7) The STA will be allowed to support the shift crew rather than only the shift supervisor. This provides more flexibility and does not dilute the function of the STA. (L7)
- 8) The Occupational Radiation Exposure Report will be submitted by April 30 of each calendar year instead of prior to March 1. (L9)
- 9) An allowance is proposed that will revise the high radiation areas to include additional previously approved methods for implementation of alternatives to the "control device" or "alarm signal" requirements of 10 CFR 20. These alternatives provide adequate control of personnel in high radiation areas as evidenced by NRC issuance of NUREG-1432. (L10)
- 10) An allowance to require periodic testing of stored fuel for the particulates only. (L1)
- 11) The removal of the requirement to notify the Vice President, Operations ANO within 24 hours of violating a safety limit. (L12)

- 12) The Radioactive Effluent Release Report will be submitted by May 1 of each calendar year instead of prior to March 1. (L13)
- 13) A change that allows a 25% extension of the frequency in accordance with SR 4.0.2 for the integrated leak tests of each system outside containment that could contain highly radioactive fluids. (L15)
- 14) A change that allows the OSRC review of the desirability of maintaining a channel in the bypassed condition to be at or before the next regularly scheduled meeting. (L16)

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

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

Response: No.

Administrative Changes:

The proposed changes involve reformatting and rewording of the existing TSs. The reformatting and rewording process involves no technical changes to existing requirements. As such, the proposed changes are administrative in nature and do not impact initiators of analyzed events or assumed mitigation of accident or transient events.

Less Restrictive – Administrative Deletion of Requirements

The proposed changes relocate requirements from the TSs to other license basis documents which are under licensee control. The documents containing the relocated requirements will be maintained using the provisions of applicable regulatory requirements.

More Restrictive Changes

The proposed changes provide more stringent requirements for the ANO-2 TSs. These more stringent requirements are not assumed to be initiators of analyzed events and will not alter assumptions relative to mitigation of accident or transient events. The more stringent requirements are imposed to ensure process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis and to provide greater consistency with the ANO-1 TS and NUREG 1432.

Less Restrictive Changes

- 1) A note will be added that allows three (3) hours to perform the channel functional test on the control room radiation monitors without entering the associated Actions.

The control room area radiation monitor is used to support mitigation of the consequences of an accident; however, it is not considered the initiator of any

previously analyzed accident. Also, the addition of the Note to allow time for testing reduces the potential for initiation of a previously analyzed accident due to reduced potential for shutdowns and startups due to incomplete or missed surveillances. As such, the proposed revision to include an allowance for testing does not significantly increase the probability of any accident previously evaluated. This change does not result in any hardware changes, but does allow operation for a limited time with an inoperable monitor for the purposes of testing. Since the capability of the control room area radiation monitor to provide the required information continues to be verified, and the time allowed for inoperability for testing is short, the change will not reduce the capability of required equipment to mitigate the event. Also, the consequences of an event occurring during the proposed operation of the unit during the allowed inoperability for testing are the same as the consequences of an event occurring while operating under the current TS Actions. Therefore, this change does not involve a significant increase in the consequences of any accident previously evaluated.

- 2) This change will allow the control room boundary to be opened intermittently under administrative controls, and will allow both trains of the CREVS to be inoperable due to control room boundary inoperability for a period of 24 hours.

Neither CREVS nor the control room boundary is the initiator of any accident analyzed in the SAR. Therefore, this change does not result in a significant increase in the probability of an accident previously evaluated.

The CREVS and the control room boundary are intended to provide a habitable environment for the control room operators in the event of an accident that results in the release of radioactivity to the environment. The allowance to open the control room boundary intermittently is acceptable, because of the administrative controls that will be implemented to ensure that the opening can be rapidly closed when the need for control room isolation is indicated, restoring the control room habitability envelope. Allowing both CREVS trains to be inoperable for 24 hours due to an inoperable control room boundary is acceptable because of the low probability of an accident requiring control room isolation during any given 24 hour period, because entry into this condition is expected to be an infrequent occurrence, and because preplanned compensatory measures to protect the control room operators from potential hazards are implemented. Therefore, this change will not result in a significant increase in the probability of an accident previously evaluated.

- 3) An allowance will be added to allow use of a "simulated" or "actual" signal when testing the automatic isolation feature of the control room air filtration system.

The phrase "actual or simulated" in reference to the automatic initiation signal, has been added to the system functional test surveillance test description. This does not impose a requirement to create an "actual" signal, nor does it eliminate any restriction on producing an "actual" signal. The proposed change does not affect the procedures governing plant operations and the acceptability of creating these signals; it simply would allow such a signal to be utilized in evaluating the acceptance criteria for the system functional test requirements. Therefore, the change does not involve a significant increase in the probability of an accident

previously evaluated. Since the function of the system functional test remains unaffected the change does not involve a significant increase in the consequences of an accident previously evaluated.

- 4) An allowance for the diesel fuel storage tanks to contain less than 22,500 gallons of fuel for up to 48 hours as long as the individual volume is greater than 17,446 gallons will be added. The lower value when summed with the contents of the other tank ensures six days of fuel oil is available. During the 48 hours, the diesel generator is capable of performing its intended function. There is a low probability that an event would occur for which the diesel generator would be required during this short period of time when the lower fuel oil volume is allowed.

The AC Sources are used to support mitigation of the consequences of an accident and can be involved in the initiation of the accident analyzed in SAR. Equipment powered by the AC Sources, which may be considered as an initiator, continues to be assured of electrical power. The proposed increased restoration time involves parameters unrelated to initiating the failure of the AC Sources. As such the proposed time allowance for restoration of limited levels of readiness parameter degradation will not increase the probability of any accident previously evaluated. The proposed changes allow additional time for restoration of parameters that have been identified as not immediately affecting the capability of the power source to provide its required safety function. The identified parameters are capable of being replenished during operation of the diesel generators, and the short additional allowable action time continues to provide adequate assurance of operable required equipment. Therefore, this change does not involve a significant increase in the probability of or the consequences of any accident previously evaluated.

- 5) Seven days will be allowed to restore the stored diesel fuel oil total particulates to within the required limits prior to declaring the associated diesel inoperable.

The testing of diesel generator fuel oil is not considered an initiator, or a mitigating factor, in any previously evaluated accident. The presence of particulates does not mean failure of the fuel oil to burn properly in the diesel engine. In addition, particulate concentration is unlikely to change significantly between surveillance intervals (31 days). Therefore, the change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 6) An allowance for the person who is satisfying the requirement of the radiation protection staff position and for the person filling the Shift Technical Advisor (STA) position to be vacant for not more than two hours in order to provide for unexpected absences is being added. This is consistent with the allowance permitted for the control room operator as reflected in existing TSs.

This change does not result in any changes in hardware or methods of operation. The change allowing the absence of the STA or the radiation protection technician is not considered in the safety analysis, and cannot initiate or affect the mitigation of an accident in any way. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 7) The STA will be allowed to support the shift crew rather than only the shift supervisor. This provides more flexibility and does not dilute the function of the STA.

This change does not result in any changes in hardware or methods of operation. The change in the support relationship between the STA and the control room staff is not considered in the safety analysis, and cannot initiate or affect the mitigation of an accident in any way. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 8) The Occupational Radiation Exposure Report will be submitted by April 30 of each calendar year instead of prior to March 1.

This change does not result in any changes in hardware or methods of operation. The change in date for submittal of "after the fact" information is not considered in the safety analysis, and cannot initiate or affect the mitigation of an accident in any way. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 9) An allowance is proposed that will revise the high radiation areas to include additional previously approved methods for implementation of alternatives to the "control device" or "alarm signal" requirements of 10 CFR 20. These alternatives provide adequate control of personnel in high radiation areas as evidenced by NRC issuance of NUREG-1432.

The controls for access to a high radiation area are not considered as initiators, or as a mitigation factor, in any previously evaluated accident. Therefore, the change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 10) An allowance to require periodic testing of stored fuel for the particulates only is proposed.

The testing of diesel generator fuel oil is not considered an initiator or a mitigating factor in any previously evaluated accident. Therefore, the change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 11) The removal of the requirement to notify the Vice President, Operations ANO within 24 hours of violating a safety limit.

Notification of the Vice President, Operations ANO when a safety limit is violated is not considered an initiator or a mitigating factor in any previously evaluated accident. Therefore, the change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 12) The Radioactive Effluent Release Report will be submitted by May 1 of each calendar year instead of prior to March 1.

This change does not result in any changes in hardware or methods of operation. The change in date for submittal of "after the fact" information is not considered in the

safety analysis, and cannot initiate or affect the mitigation of an accident in any way. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 13) A change that allows a 25% extension of the frequency in accordance with SR 4.0.2 for the integrated leak tests of each system outside containment that could contain highly radioactive fluids.

The extension of the testing frequency, up to 25% of the test interval, is not considered an initiator or a mitigating factor in any previously evaluated accident. Therefore, the change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

- 14) A change that allows the OSRC review of the desirability of maintaining a channel in the bypassed condition to be at or before the next regularly scheduled meeting.

The proposed change is not considered an initiator or a mitigating factor in any previously evaluated accident. Therefore, the change does not involve a significant increase in the probability or consequences of any accident previously evaluated.

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

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

Response: No.

Administrative Changes:

The proposed changes do not necessitate a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operations. The proposed changes will not impose any different requirements.

Less Restrictive – Administrative Deletion of Requirements

The proposed change does not necessitate a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operations. The proposed changes will not impose any different requirements and adequate control of the information will be maintained.

More Restrictive Changes

The proposed change does not necessitate a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. The proposed changes do impose different requirements. However, these changes do not impact the safety analysis and licensing basis.

Less Restrictive Changes

- 1) A note will be added that allows three (3) hours to perform the channel functional test on the control room radiation monitors without entering the associated Actions.

The proposed change does not necessitate a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. The proposed change will still ensure proper surveillances are required for the equipment considered in the safety analysis. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 2) This change will allow the control room boundary to be opened intermittently under administrative controls, and will allow both trains of the control room ventilation system (CREVS) to be inoperable due to a control room boundary inoperability for a period of 24 hours.

The proposed change does not necessitate a physical alteration of the unit (no new or different type of equipment will be installed) or changes in parameters governing normal unit operation. Prompt and appropriate compensatory actions will still be taken in the event of an accident. Thus, this change does not create the possibility of a new or different kind of accident from any previously evaluated.

- 3) An allowance will be added to allow use of a "simulated" or "actual" signal when testing the automatic isolation feature of the control room air filtration system.

The possibility of a new or different kind of accident from any accident previously evaluated is not created because the proposed change introduces no new mode of plant operation and it does not involve physical modification to the plant.

- 4) An allowance for the diesel fuel storage tanks to contain less than 22,500 gallons of fuel for up to 48 hours as long as the individual volume is greater than 17,446 gallons will be added. The lower value when summed with the contents of the other tank ensures six days of fuel oil is available. During the 48 hours, the diesel generator is capable of performing its intended function. There is a low probability that an event would occur for which the diesel generator would be required during this short period of time when the lower fuel oil volume is allowed.

The proposed change does not necessitate a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. The proposed change will continue to ensure operable safety equipment is available. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 5) Seven days will be allowed to restore the stored diesel fuel oil total particulates to within the required limits prior to declaring the associated diesel inoperable.

No changes are proposed in the manipulation of the plant structures, systems, or components, or in the design of the plant structures, systems, or components. The presence of particulates does not mean failure of the fuel oil to burn properly in the diesel engine. In addition, particulate concentration is unlikely to change significantly between surveillance intervals (31 days). Therefore, the change does not create the

possibility of a new or different kind of accident from any accident previously evaluated.

- 6) An allowance for the person who is satisfying the requirement of the radiation protection staff position and for the person filling the Shift Technical Advisor (STA) position to be vacant for not more than two hours in order to provide for unexpected absences is proposed. This is consistent with the allowance permitted for the control room operator as reflected in existing TSs.

The proposed change does not necessitate a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. The proposed change will impact only the STA and radiation protection staffing positions and does not directly impact the operation of the plant. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 7) The STA will be allowed to support the shift crew rather than only the shift supervisor. This provides more flexibility and does not dilute the function of the STA.

The proposed change does not necessitate a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. The proposed change will impact only the support relationship the STA provides the control room staff and does not directly impact the operation of the plant. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 8) The Occupational Radiation Exposure Report will be submitted by April 30 of each calendar year instead of prior to March 1.

The proposed change does not necessitate a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. The proposed change will impact only the administrative requirements for submittal of information and does not directly impact the operation of the plant. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 9) An allowance is proposed that will revise the high radiation areas to include additional previously approved methods for implementation of alternates to the "control device" or "alarm signal" requirements of 10 CFR 20. These alternatives provide adequate control of personnel in high radiation areas as evidenced by NRC issuance of NUREG-1432.

No changes are proposed in the manipulation of the plant structures, systems, or components, or in the design of the plant structures, systems, or components. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 10) An allowance to require periodic testing of stored fuel for the particulates only is proposed.

No changes are proposed in the manipulation of the plant structures, systems, or components, or in the design of the plant structures, systems, or components. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 11) The removal of the requirement to notify the Vice President, Operations ANO within 24 hours of violating a safety limit.

No changes are proposed that result in the manipulation or the design of plant structures, systems, or components. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 12) The Radioactive Effluent Release Report will be submitted by May 1 of each calendar year instead of prior to March 1.

The proposed change does not necessitate a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. The proposed change will impact only the administrative requirements for submittal of information and does not directly impact the operation of the plant. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 13) A change that allows a 25% extension of the frequency in accordance with SR 4.0.2 for the integrated leak tests of each system outside containment that could contain highly radioactive fluids.

No changes are proposed that result in the manipulation or the design of plant structures, systems, or components. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- 14) A change that allows the OSRC review of the desirability of maintaining a channel in the bypassed condition to be at or before the next regularly scheduled meeting.

No changes are proposed that result in the manipulation or the design of plant structures, systems, or components. Therefore, the change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

3. Do the proposed changes involve a significant reduction in a margin of safety?

Response: No.

Administrative Changes:

The proposed changes will not reduce the margin of safety because they have no impact on any safety analysis assumptions. The changes are administrative in nature.

Less Restrictive – Administrative Deletion of Requirements

The proposed changes will not reduce a margin of safety because they have no impact on any safety analysis assumptions. In addition, the requirements to be transposed from the TSs to other license basis documents, which are under licensee control, are the same as the exiting TSs. The documents containing the relocated requirements will be maintained using the provisions of applicable regulatory requirements.

More Restrictive Changes

The imposition of more stringent requirements prevents a reduction in the margin of plant safety by:

- a) increasing the scope of the specification to include additional plant equipment,
- b) providing additional actions,
- c) decreasing restoration times, or
- d) imposing new surveillances.

The changes are consistent with the safety analysis and licensing basis.

Less Restrictive Changes

- 1) A note will be added that allows three (3) hours to perform the channel functional test on the control room radiation monitors without entering the associated Actions.

The margin of safety for the control room area radiation monitor is based on availability and capability of the instrumentation to provide the required information to the operator. The frequency is based on unit operating experience that demonstrates channel failure is rare, and on the use of less formal but more frequent checks of channels during normal operational use of the displays associated with the required channels. Therefore, the availability and capability of the control room area radiation monitor continues to be assured by the proposed Surveillance Requirements and this change does not involve a significant reduction in a margin of safety.

- 2) This change will allow the control room boundary to be opened intermittently under administrative controls, and will allow both trains of the control room ventilation system (CREVS) to be inoperable due to control room boundary inoperability for a period of 24 hours.

This change does not involve a significant reduction in a margin of safety since: 1) administrative controls will be in place to ensure that an open control room boundary can be rapidly closed when a need for control room isolation is indicated; and 2) an inoperable control room boundary that renders both trains of CREVS inoperable is an infrequent occurrence, the probability of an accident requiring control room isolation

during any given 24 hour period is low, and preplanned compensatory measures to protect the control room operators from potential hazards are implemented.

- 3) An allowance will be added to use a simulated or actual signal when testing the automatic isolation feature of the control room air filtration system.

Use of an actual signal instead of the existing requirement which limits use to a simulated signal, will not affect the performance of the surveillance test. OPERABILITY is adequately demonstrated in either case since the system itself can not discriminate between "actual" or "simulated" signals. Therefore, the change does not involve a significant reduction in a margin of safety.

- 4) An allowance for the diesel fuel storage tanks to contain less than 22,500 gallons of fuel for up to 48 hours as long as the individual volume is greater than 17,446 gallons. The lower value when summed with the contents of the other tank ensures six days of fuel oil is available. During the 48 hours, the diesel generator is capable of performing its intended function. There is a low probability that an event would occur for which the diesel generator would be required during this short period of time when the lower fuel oil volume is allowed.

The parameter limits provide substantial margin to the parameter values that would be absolutely necessary for diesel generator operability. When the parameters are less than their limits this margin is reduced. However, the availability of AC Sources continues to be assured since the allowed time for parameters to be less than their limits is short and the allowed levels for the parameters are adequate to provide the immediately needed power availability. Further, the parameters can be restored to within limits during the proposed time provided should they be required. Therefore, this change does not result in a significant reduction in margin of safety.

- 5) Seven days will be allowed to restore the stored diesel fuel oil total particulates to within the required limits prior to declaring the associated diesel inoperable.

The proposed change allows the stored diesel fuel oil total particulates to be outside the required limits for seven days before declaring the associated diesel inoperable. The presence of particulates does not mean failure of the fuel oil to burn properly in the diesel engine. In addition, particulate concentration is unlikely to change significantly between surveillance intervals (31 days). The seven day allowance provides an appropriate backstop to ensure the particulate level is restored to within limits in a reasonable time period. Since the diesel is still capable of performing its function the margin to safety is not reduced.

- 6) An allowance for the person who is satisfying the requirement of the radiation protection staff position and for the person filling the Shift Technical Advisor (STA) position to be vacant for not more than two hours in order to provide for unexpected absences is proposed. This is consistent with the allowance permitted for the control room operator as reflected in existing TSs.

The margin of safety is not dependent on the presence of the STA or the radiation protection technician. Therefore, this change does not involve a significant reduction in a margin of safety.

- 7) The STA will be allowed to support the shift crew rather than only the shift supervisor. This provides more flexibility and does not dilute the function of the STA.

The margin of safety is not dependent upon who the STA supports. Therefore, this change does not involve a significant reduction in a margin of safety.

- 8) The Occupational Radiation Exposure Report will be submitted by April 30 of each calendar year instead of prior to March 1.

The margin of safety is not dependent on the submittal of information. Therefore, this change does not involve a significant reduction in a margin of safety.

- 9) An allowance is proposed that will revise the high radiation areas to include additional previously approved methods for implementation of alternatives to the "control device" or "alarm signal" requirements of 10 CFR 20. These alternatives provide adequate control of personnel in high radiation areas as evidenced by NRC issuance of NUREG-1432.

The requirements for control of high radiation areas provide for the use of alternates to the "control device" or "alarm signal" requirements of 10 CFR 20.1601. This change provides such alternative methods for controlling access. These methods and additional administrative requirements have been determined to provide adequate controls to prevent unauthorized and inadvertent access to such areas. Therefore, this change does not involve a significant reduction in a margin of safety.

- 10) An allowance to require periodic testing of stored fuel for the particulates only is proposed.

The testing of stored diesel generator fuel oil is revised to require the periodic testing of the stored fuel oil only for particulates (replacing the periodic testing per ASTM-D975) once every 31 days. The change reflects industry-standard acceptable DG fuel oil testing programs. Over the storage life of ANO-2 DG fuel oil, the properties tested by ASTM-D975 are not expected to change and performing these tests once on the new fuel oil provides adequate assurance of the proper initial quality of fuel oil. The periodic testing for particulates monitors a parameter that reflects degradation of fuel oil and can be trended to provide increased confidence that the stored DG fuel oil will support DG operability. Therefore, this change does not involve a significant reduction in a margin of safety.

- 11) The removal of the requirement to notify the Vice President, Operations ANO within 24 hours of violating a safety limit.

The margin of safety is not dependent upon notification of the Vice President, Operations ANO upon the violation of a TS safety limit. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

- 12) The Radioactive Effluent Release Report will be submitted by May 1 of each calendar year instead of prior to March 1.

The margin of safety is not dependent on the submittal of information. Therefore, this change does not involve a significant reduction in a margin of safety.

- 13) A change that allows a 25% extension of the frequency in accordance with SR 4.0.2 for the integrated leak tests of each system outside containment that could contain highly radioactive fluids.

The proposed allowance allows a possible increase in performance interval. However, the test will still be performed at reasonable intervals to ensure the intent of the surveillance is maintained. Therefore, this change does not involve a significant reduction in a margin of safety.

- 14) A change that allows the OSRC review of the desirability of maintaining a channel in the bypassed condition to be at or before the next regularly scheduled meeting.

The proposed change allows the OSRC review to occur earlier than previously required if an OSRC meeting is called before the next regularly scheduled meeting. Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

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

3.3 Environmental Considerations

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

Attachment 2

To

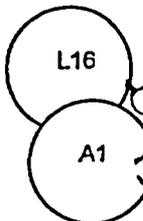
Letter #

Revised Markup of Technical Specification Pages

TABLE 3.3-1 (Continued)

ACTION STATEMENTS

ACTION 2 – With the number of channels OPERABLE one less than the Total Number of Channels, operation in the applicable MODES may continue provided the inoperable channel is placed in the bypassed or tripped condition within 1 hour. If the inoperable channel is bypassed for greater than 48 hours, the desirability of maintaining this channel in the bypassed condition shall be reviewed as soon as possible but no later than at the next regularly scheduled PSC OSRC meeting in accordance with the QA Manual Operations Quality Assurance Program Manual (QAPM). The channel shall be returned to OPERABLE status prior to startup following the next COLD SHUTDOWN.



With a channel process measurement circuit that affects multiple functional units inoperable or in test, bypass or trip all associated functional units as listed below.

<u>Process Measurement Circuit</u>	<u>Functional Unit Bypassed</u>
1. Linear Power (Subchannel or Linear)	Linear Power Level – High Local Power Density – High DNBR – Low Log Power Level – High*
2. Pressurizer Pressure – NR	Pressurizer Pressure – High Local Power Density – High DNBR – Low
3. Containment Pressure – NR	Containment Pressure – High (RPS) Containment Pressure – High (ESFAS) Containment Pressure – High-High (ESFAS)
4. Steam Generator 1 Pressure	Steam Generator 1 Pressure – Low Steam Generator 1 ΔP (EFAS 1) Steam Generator 2 ΔP (EFAS 2)
5. Steam Generator 2 Pressure	Steam Generator 2 Pressure – Low Steam Generator 1 ΔP (EFAS 1) Steam Generator 2 ΔP (EFAS 2)
6. Steam Generator 1 Level	Steam Generator 1 Level – Low Steam Generator 1 ΔP (EFAS 1)
7. Steam Generator 2 Level	Steam Generator 2 Level – Low Steam Generator 2 ΔP (EFAS 2)
8. Core Protection Calculator	Local Power Density – High DNBR – Low

* Only for failure common to both linear power and log power.

TABLE 3.3-3 (Continued)

TABLE NOTATION

- (a) Trip function may be bypassed in this MODE when pressurizer pressure is below 400 psia; bypass shall be automatically removed before pressurizer pressure exceeds 500 psia.
- (b) An SIAS signal is first necessary to enable CSAS logic.
- (c) Remote manual not provided for RAS. These are local manuals at each ESF auxiliary relay cabinet.

ACTION STATEMENTS

ACTION 9 – With the number of OPERABLE channels one less than the Total Number of Channels, restore the inoperable channel to OPERABLE status within 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

ACTION 10 – With the number of channels OPERABLE one less than the Total Number of Channels, operation in the applicable MODES may continue provided the inoperable channel is placed in the bypassed or tripped condition within 1 hour. If the inoperable channel is bypassed for greater than 48 hours, the desirability of maintaining this channel in the bypassed condition shall be reviewed as soon as possible but no later than at the next regularly scheduled PSC OSRC meeting in accordance with the QA Manual Operations Quality Assurance Program Manual (QAPM). The channel shall be returned to OPERABLE status prior to startup following the next COLD SHUTDOWN.

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A1

If an inoperable Steam Generator ΔP or RWT Level – Low channel is placed in the tripped condition, remove the inoperable channel from the tripped condition within 48 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

With a channel process measurement circuit that affects multiple functional units inoperable or in test, bypass or trip all associated functional units as listed below.

<u>Process Measurement Circuit</u>	<u>Functional Unit Bypassed</u>
1. Containment Pressure – NR	Containment Pressure – High (RPS) Containment Pressure – High (ESFAS) Containment Pressure – High-High (ESFAS)
2. Steam Generator 1 Pressure	Steam Generator 1 Pressure – Low Steam Generator 1 ΔP (ESFAS 1) Steam Generator 2 ΔP (ESFAS 2)
3. Steam Generator 2 Pressure	Steam Generator 2 Pressure – Low Steam Generator 1 ΔP (ESFAS 1) Steam Generator 2 ΔP (ESFAS 2)
4. Steam Generator 1 Level	Steam Generator 1 Level – Low Steam Generator 1 ΔP (EFAS 1)
5. Steam Generator 2 Level	Steam Generator 2 Level – Low Steam Generator 2 ΔP (EFAS 2)

EMERGENCY CORE COOLING SYSTEMS

ECCS SUBSYSTEMS – $T_{avg} \geq 300^{\circ}\text{F}$

LIMITING CONDITION FOR OPERATION

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

APPLICABILITY: MODES 1, 2 and 3 with pressurizer pressure ≥ 1700 psia.

ACTION:

- With one ECCS subsystem inoperable due to an inoperable LPSI train, restore the inoperable train to OPERABLE status within 7 days or be in HOT STANDBY within the next 6 hours and reduce pressurizer pressure to < 1700 psia within the following 6 hours.
- With one or more ECCS subsystems inoperable due to conditions other than "a" above and 100% of ECCS flow equivalent to a single OPERABLE HPSI and LPSI train is available, restore the inoperable train(s) to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and reduce pressurizer pressure to < 1700 psia within the following 6 hours.
- With less than 100% ECCS flow equivalent to either the HPSI or LPSI trains within both ECCS subsystems, restore at least one HPSI train and one LPSI train to OPERABLE status within one hour or be in at least HOT STANDBY within the next 6 hours and reduce pressurizer pressure to < 1700 psia within the following 6 hours.
- In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the Commission pursuant to Specification 6.9.2 NRC within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date.

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PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- (AI) (eb.) At least once per 18 months by: (AI)
1. ~~Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is < 6 inches Water Gauge while operating the system at a flow rate of 2000 cfm \pm 10%.~~ (AI) ~~LATER PTS 6.5.11~~ (LII) (LII)
2. ~~Verifying verifying that on a control room high radiation test signal (either actual or simulated) the system automatically isolates the control room within 70 seconds and switches into a recirculation mode of operation with flow through the HEPA filters and charcoal adsorber banks.~~ (AI) (LII) (LA2)
- e. ~~After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove \geq 99.95% of the DOP when they are tested in place in accordance with ANSI N510-1975 while operating the system at a flow rate of 2000 cfm \pm 10%.~~
- f. ~~After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove \geq 99.95% of a halogenated hydrocarbon refrigerant test gas when they are tested in place in accordance with ANSI N510-1975 while operating the system at a flow rate of 2000 cfm \pm 10%.~~ (AI) Later PTS 6.5.11
- c. ~~By performing the required Control Room Emergency Ventilation filter testing in accordance with the Ventilation Filter Testing Program (VFTP).~~ (AB)
- d. ~~At least once per 18 months verify VSF-9 makeup flow rate is \geq 300 and \leq 366 cfm when supplying the control room with outside air.~~ (MII)
- e. ~~At least once per 18 months verify 2VSF-9 makeup flow rate is \geq 418.5 and \leq 511.5 cfm when supplying the control room with outside air.~~ (MII)

Note: The new actions b.2, c, d. and e. will be on page 3/4 7-18 in the clean pages and page 3/4 7-19 will be deleted.

(AI)

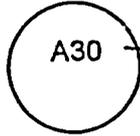
3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

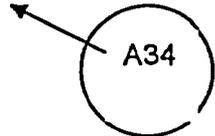
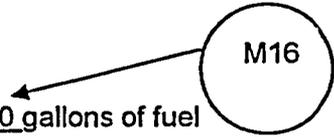
LIMITING CONDITION FOR OPERATION

3.8.1.1 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

- a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system and
- b. Two separate and independent diesel generators each with:



- 1. A day fuel tank containing a minimum volume of 280-300 gallons of fuel (equivalent to 50% of indicated tank volume).
- 2. A separate fuel storage system containing a minimum volume of 22,500 gallons of fuel (equivalent to 100% of indicated tank level), and
- 3. A separate fuel transfer pump.



APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With one offsite A.C. circuit of the above required A.C. electrical power sources inoperable, perform the following:
 - 1. Demonstrate the OPERABILITY of the remaining offsite A.C. circuit by performing Surveillance Requirement 4.8.1.1.a within 1 hour and at least once per 8 hours thereafter, and
 - 2. Restore the offsite A.C. circuit to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Startup Transformer No. 2 may be removed from service for up to 30 days as part of a preplanned preventative maintenance schedule. The 30-day allowance may be applied not more than once in a 10-year period. The provisions of Specification 3.0.4 are not applicable to Startup Transformer No. 2 during the 30-day preventative maintenance period.

ELECTRICAL POWER SYSTEMS

3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

LIMITING CONDITION FOR OPERATION

- b. With one diesel generator of the above required A.C. electrical power source inoperable, perform the following:
1. Demonstrate the OPERABILITY of both the offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.a within 1 hour and at least once per 8 hours thereafter, and
 2. Demonstrate the OPERABILITY of the remaining OPERABLE diesel generator within 24 hours by:
 - i. Determining the OPERABLE diesel generator is not inoperable due to a common cause failure, or
 - ii. Perform Surveillance Requirement 4.8.1.1.2.a.4 unless:
 - a. The remaining diesel generator is currently in operation, or
 - b. The remaining diesel generator has been demonstrated OPERABLE within the previous 24 hours, and
 3. Restore the diesel generator to OPERABLE status within 14 days (See Note 1) or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

Note 1 - If the Alternate A.C. Diesel Generator (AACDG) is determined to be inoperable during this period, the a 72 hour restoration period is applicable until either the AACDG or the diesel generator is returned to operable status (not to exceed 14 days from the initial diesel generator inoperability).

No Changes are proposed to this page. It is included for reference only. In the original submittal this was moved from page 8-1. Amendment 249 moved this and included the other changes that are reflected.

ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

LIMITING CONDITION FOR OPERATION

- c. With one offsite A.C. circuit and one diesel generator of the above required A.C. electrical power sources inoperable, perform the following:
1. Demonstrate the OPERABILITY of the remaining offsite A.C. circuit by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter; and,
 2. If the diesel generator became inoperable due to any cause other than preplanned preventive maintenance or testing, then
 - i. Demonstrate the OPERABILITY of the remaining OPERABLE diesel generator by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours except when:
 - a. The remaining diesel generator is currently in operation, or
 - b. The remaining diesel generator has been demonstrated OPERABLE within the previous 8 hours, and
 3. Restore at least one of the inoperable sources to OPERABLE status within 12 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours, and
 4. Restore the remaining inoperable A.C. Source to an OPERABLE status (Offsite A.C. Circuit within 72 hours or Diesel Generator ~~with~~within 14 days(see b.3, Note 1)) based on the time of the initiating event that caused the inoperability or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- d. With two offsite A.C. circuits of the above required A.C. electrical power sources inoperable, perform the following:
1. Perform Surveillance Requirement 4.8.1.1.2.a.4 on the diesel generators within the next 8 hours except when:
 - i. The diesel generators are currently in operation, or
 - ii. The diesel generators have been demonstrated OPERABLE within the previous 8 hours, and
 2. Restore one of the inoperable offsite A.C. circuits to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours, and
 3. Restore both A.C. circuits within 72 hours of the ~~initiating~~initiating event or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

All
A1

ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

LIMITING CONDITION FOR OPERATION

- e. With two diesel generators of the above required A.C. electrical power sources inoperable, perform the following:
1. Demonstrate the OPERABILITY of the two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter, and
 2. Restore one of the inoperable diesel generators to OPERABLE status within 2 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours, and
 3. Restore the remaining inoperable diesel generators within 14 days (see b.3, Note 1) of the initiating event or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

The original proposed change moved this information from page 3/4 8-2a. TS Amendment 249 relocated this information to this page and included the changes as reflected. This page is included for information only as no changes were proposed other than the relocation of the action.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

- 4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:
- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments, indicated power availability, and
 - b. Demonstrated OPERABLE at least once per 18 months during shutdown by transferring (manually and automatically) unit power supply from the normal circuit to the alternate circuit.

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

- a. At least once per 31 days on a STAGGERED TEST BASIS by:
 - 1. Verifying the fuel level in the day fuel tank.
 - 2. ~~Verifying the fuel level in the fuel storage tank.~~ deleted
 - 3. Verifying the fuel transfer pump can be started and transfers fuel from the storage system to the day tank.
 - 4. Verifying the diesel starts from a standby condition and accelerates to at least 900 rpm in ≤ 15 seconds. (Note 2)
 - 5. Verifying the generator is synchronized, loaded to an indicated 2600 to 2850 Kw and operates for ≥ 60 minutes. (Notes 3 & 4)
 - 6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
- b. ~~At least once per 92 days by verifying that a sample of diesel fuel from the fuel storage tank obtained in accordance with ASTM D270-65, is within the acceptable limits specified in Table 1 of ASTM D975-74 when checked for viscosity, water and sediment.~~ deleted

A34

Later PTS SR
4.8.1.3

Later PTS 6.5.13

A1

Note 1

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

Note 2

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

Note 3

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

Note 4

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

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION

3.8.1.3 The stored diesel fuel oil shall be within limits for each required diesel generator.

APPLICABILITY: When associated diesel generator is required to be OPERABLE.

(A1)

ACTION:

With the volume of the stored diesel fuel oil less than 22,500 gallons for either fuel oil storage tank or the new or stored fuel oil properties outside the limits of the Diesel Fuel Oil Testing Program, perform the following as appropriate: (Note – Separate ACTION entry is allowed for each diesel generator.)

1. If one or more fuel storage tanks contain less than 22,500 gallons and greater than 17,446 gallons, restore the fuel oil volume to within limits within 48 hours. (L4)

2. If the stored fuel oil total particulates are not within limits for one or more diesel generators, restore fuel oil total particulates to within limits within 7 days. (L5)

3. If new fuel oil properties are not within limits for the one or more diesel generators, restore stored fuel oil properties to within limits within 30 days. (M6)

4. If ACTION 1 is not met within the allowable outage time or is outside the allowable limits, or if ACTION 2 or 3 is not met within the allowable outage time, then immediately declare the associated diesel generator inoperable. (A10)

SURVEILLANCE REQUIREMENTS

4.8.1.3.1 At least once per 31 days on a STAGGERED TEST BASIS verify the fuel oil storage tank contains $\geq 22,500$ gallons of fuel. (A1) Moved from SR 4.8.1.1.2.b

4.8.1.3.2 Verify fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of the Diesel Fuel Oil Testing Program. (A36)

ADMINISTRATIVE CONTROL

(AI)

6.6.5 CORE OPERATING LIMITS REPORT (COLR) (Continued)

(AI)

- 10) "Calculative Methods for the CE Small Break LOCA Evaluation Model," CENPD-137, Supplement 2-P-A, dated April, 1998 (Methodology for Specification 3.1.1.4 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI).
- 11) "CESEC-Digital Simulation of a Combustion Engineering Nuclear Steam Supply System," December 1981 (Methodology for Specifications 3.1.1.1 and 3.1.1.2 for Shutdown Margin, 3.1.1.4 for MTC, 3.1.3.1 for CEA Position, 3.1.3.6 for Regulating CEA and Group P Insertion Limits, and 3.2.4.b for DNBR Margin).
- 12) "Technical Manual for the CENTS Code," CENPD 282-P-A, February 1991 (Methodology for Specifications 3.1.1.1 and 3.1.1.2 for Shutdown Margin, 3.1.1.4 for MTC, 3.1.3.1 for CEA Position, 3.1.3.6 for Regulating and Group P Insertion Limits, and 3.2.4.b for DNBR Margin).
- 13) Letter: O.D. Parr (NRC) to F.M. Stern (CE), dated June 13, 1975 (NRC Staff Review of the Combustion Engineering ECCS Evaluation Model). NRC approval for 6.9.5.1.46.6.5.b.4, 6.9.5.1.56.6.5.b.5, and 6.9.5.1.86.6.5.b.8 methodologies. (AI)
- 14) Letter: O.D. Parr (NRC) to A.E. Scherer (CE), dated December 9, 1975 (NRC Staff Review of the Proposed Combustion Engineering ECCS Evaluation Model changes). NRC approval for 6.9.5.16.6.5.d.6 methodology. (AI)
- 15) Letter: K. Kniel (NRC) to A.E. Scherer (CE), dated September 27, 1977 (Evaluation of Topical Reports CENPD-133, Supplement 3-P and CENPD-137, Supplement 1-P). NRC approval for 6.9.5.16.6.5.b.9 methodology. (AI)
- 16) Letter: 2CNA038403, dated March 20, 1984, J.R. Miller (NRC) to J.M. Griffin (AP&L), "CESEC Code Verification." NRC approval for 6.9.5.16.6.5.b.11 methodology. (AI)
- 17) "Calculative Methods for the CE Nuclear Power Large Break LOCA Evaluation Model," CENPD-132-P, Supplement 4-P-A, Revision 1 (Methodology for Specification 3.1.1.4 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI).

6.9.5.2c

(AI)

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

(AI)

6.9.5.3d

The CORE OPERATING LIMITS REPORT (COLR), including any mid-cycle revisions or supplements thereto, shall be provided upon issuance to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector for each reload cycle to the NRC.

(AI)

2) New 6.5.2 (A3)

Primary Coolant Sources Outside Containment

(A1) ~~EOI shall implement a program to reduce. This program provides controls to minimize leakage from those portions of systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable levels.~~ The program shall include the following:

a. ~~Provisions establishing preventive maintenance and periodic visual inspection requirements, and~~

(MIS) b. ~~Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals, least once per 18 months. The provisions of Surveillance Requirements 4.0.2 are applicable.~~

(LIS)

Attachment 3

To

Letter #

Revised Clean Copy of Technical Specification Pages

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

- 4.7.6.1.1 Each control room emergency air conditioning system shall be demonstrated OPERABLE:
- a. At least once per 31 days on a STAGGERED TEST BASIS by:
 1. Starting each unit from the control room, and
 2. Verifying that each unit operates for at least 1 hour and maintains the control room air temperature $\leq 84^{\circ}\text{F D.B.}$
 - b. At least once per 18 months by verifying a system flow rate of $9900 \text{ cfm} \pm 10\%$.
- 4.7.6.1.2 Each control room emergency air filtration system shall be demonstrated OPERABLE:
- a. At least once per 31 days on a STAGGERED TEST BASIS by verifying that the system operates for at least 15 minutes.
 - b. At least once per 18 months by verifying that on a control room high radiation signal, either actual or simulated, the system automatically isolates the control room and switches into a recirculation mode of operation.
 - c. By performing the required Control Room Emergency Ventilation filter testing in accordance with the Ventilation Filter Testing Program (VFTP).
 - d. At least once per 18 months verify VSF-9 makeup flow rate is ≥ 300 and ≤ 366 cfm when supplying the control room with outside air.
 - e. At least once per 18 months verify 2VSF-9 makeup flow rate is ≥ 418.5 and ≤ 511.5 cfm when supplying the control room with outside air.

EMERGENCY CORE COOLING SYSTEMS

ECCS SUBSYSTEMS – $T_{avg} \geq 300^{\circ}\text{F}$

LIMITING CONDITION FOR OPERATION

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

APPLICABILITY: MODES 1, 2 and 3 with pressurizer pressure ≥ 1700 psia.

ACTION:

- With one ECCS subsystem inoperable due to an inoperable LPSI train, restore the inoperable train to OPERABLE status within 7 days or be in HOT STANDBY within the next 6 hours and reduce pressurizer pressure to < 1700 psia within the following 6 hours.
- With one or more ECCS subsystems inoperable due to conditions other than "a" above and 100% of ECCS flow equivalent to a single OPERABLE HPSI and LPSI train is available, restore the inoperable train(s) to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and reduce pressurizer pressure to < 1700 psia within the following 6 hours.
- With less than 100% ECCS flow equivalent to either the HPSI or LPSI trains within both ECCS subsystems, restore at least one HPSI train and one LPSI train to OPERABLE status within one hour or be in at least HOT STANDBY within the next 6 hours and reduce pressurizer pressure to < 1700 psia within the following 6 hours.
- In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be prepared and submitted to the NRC within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date.

3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

LIMITING CONDITION FOR OPERATION

- 3.8.1.1 As a minimum, the following A.C. electrical power sources shall be OPERABLE:
- a. Two physically independent circuits between the offsite transmission network and the onsite Class 1E distribution system and
 - b. Two separate and independent diesel generators each with:
 1. A day fuel tank containing a minimum volume of 300 gallons of fuel,
 2. A separate fuel storage system, and
 3. A separate fuel transfer pump.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

- a. With one offsite A.C. circuit of the above required A.C. electrical power sources inoperable, perform the following:
 1. Demonstrate the OPERABILITY of the remaining offsite A.C. circuit by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter, and
 2. Restore the offsite A.C. circuit to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Startup Transformer No. 2 may be removed from service for up to 30 days as part of a preplanned preventative maintenance schedule. The 30-day allowance may be applied not more than once in a 10-year period. The provisions of Specification 3.0.4 are not applicable to Startup Transformer No. 2 during the 30-day preventative maintenance period.

ELECTRICAL POWER SYSTEMS

3/4.8 ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

LIMITING CONDITION FOR OPERATION

- b. With one diesel generator of the above required A.C. electrical power source inoperable, perform the following:
1. Demonstrate the OPERABILITY of both the offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter, and
 2. Demonstrate the OPERABILITY of the remaining OPERABLE diesel generator within 24 hours by:
 - i. Determining the OPERABLE diesel generator is not inoperable due to a common cause failure, or
 - ii. Perform Surveillance Requirement 4.8.1.1.2.a.4 unless:
 - a. The remaining diesel generator is currently in operation, or
 - b. The remaining diesel generator has been demonstrated OPERABLE within the previous 24 hours, and
 3. Restore the diesel generator to OPERABLE status within 14 days (See Note 1) or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

Note 1 - If the Alternate A.C. Diesel Generator (AACDG) is determined to be inoperable during this period, the a 72 hour restoration period is applicable until either the AACDG or the diesel generator is returned to operable status (not to exceed 14 days from the initial diesel generator inoperability).

ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

LIMITING CONDITION FOR OPERATION

- c. With one offsite A.C. circuit and one diesel generator of the above required A.C. electrical power sources inoperable, perform the following:
1. Demonstrate the OPERABILITY of the remaining offsite A.C. circuit by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter; and,
 2. If the diesel generator became inoperable due to any cause other than preplanned preventive maintenance or testing, then
 - i. Demonstrate the OPERABILITY of the remaining OPERABLE diesel generator by performing Surveillance Requirement 4.8.1.1.2.a.4 within 8 hours except when:
 - a. The remaining diesel generator is currently in operation, or
 - b. The remaining diesel generator has been demonstrated OPERABLE within the previous 8 hours, and
 3. Restore at least one of the inoperable sources to OPERABLE status within 12 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours, and
 4. Restore the remaining inoperable A.C. Source to an OPERABLE status (Offsite A.C. Circuit within 72 hours or Diesel Generator within 14 days(see b.3, Note 1)) based on the time of the initiating event that caused the inoperability or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- d. With two offsite A.C. circuits of the above required A.C. electrical power sources inoperable, perform the following:
1. Perform Surveillance Requirement 4.8.1.1.2.a.4 on the diesel generators within the next 8 hours except when:
 - i. The diesel generators are currently in operation, or
 - ii. The diesel generators have been demonstrated OPERABLE within the previous 8 hours, and
 2. Restore one of the inoperable offsite A.C. circuits to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours, and
 3. Restore both A.C. circuits within 72 hours of the initiating event or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

ELECTRICAL POWER SYSTEMS

3/4.8.1 A.C. SOURCES

LIMITING CONDITION FOR OPERATION

- e. With two diesel generators of the above required A.C. electrical power sources inoperable, perform the following:
1. Demonstrate the OPERABILITY of the two offsite A.C. circuits by performing Surveillance Requirement 4.8.1.1.1.a within 1 hour and at least once per 8 hours thereafter, and
 2. Restore one of the inoperable diesel generators to OPERABLE status within 2 hours or be in a least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours, and
 3. Restore the remaining inoperable diesel generators within 14 days (see b.3, Note 1) of the initiating event or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS

- 4.8.1.1.1 Each of the above required independent circuits between the offsite transmission network and the onsite Class 1E distribution system shall be:
- a. Determined OPERABLE at least once per 7 days by verifying correct breaker alignments, indicated power availability, and
 - b. Demonstrated OPERABLE at least once per 18 months during shutdown by transferring (manually and automatically) unit power supply from the normal circuit to the alternate circuit.
- 4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE: (Note 1)
- a. At least once per 31 days on a STAGGERED TEST BASIS by:
 1. Verifying the fuel level in the day fuel tank.
 2. deleted
 3. Verifying the fuel transfer pump can be started and transfers fuel from the storage system to the day tank.
 4. Verifying the diesel starts from a standby condition and accelerates to at least 900 rpm in ≤ 15 seconds. (Note 2)
 5. Verifying the generator is synchronized, loaded to an indicated 2600 to 2850 Kw and operates for ≥ 60 minutes. (Notes 3 & 4)
 6. Verifying the diesel generator is aligned to provide standby power to the associated emergency busses.
 - b. deleted

Note 1

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

Note 2

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

Note 3

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

Note 4

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

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION

3.8.1.3 The stored diesel fuel oil shall be within limits for each required diesel generator.

APPLICABILITY: When associated diesel generator is required to be OPERABLE.

ACTION:

With the volume of the stored diesel fuel oil less than 22,500 gallons for either fuel oil storage tank or the new or stored fuel oil properties outside the limits of the Diesel Fuel Oil Testing Program, perform the following as appropriate: (Note – Separate ACTION entry is allowed for each diesel generator.)

1. If one or more fuel storage tanks contain less than 22,500 gallons and greater than 17,446 gallons, restore the fuel oil volume to within limits within 48 hours.
2. If the stored fuel oil total particulates are not within limits for one or more diesel generators, restore fuel oil total particulates to within limits within 7 days.
3. If new fuel oil properties are not within limits for the one or more diesel generators, restore stored fuel oil properties to within limits within 30 days.
4. If ACTION 1 is not met within the allowable outage time or is outside the allowable limits, or if ACTION 2 or 3 is not met within the allowable outage time, then immediately declare the associated diesel generator inoperable.

SURVEILLANCE REQUIREMENTS

4.8.1.3.1 At least once per 31 days on a STAGGERED TEST BASIS verify the fuel oil storage tank contains $\geq 22,500$ gallons of fuel.

4.8.1.3.2 Verify fuel oil properties of new and stored fuel oil are tested in accordance with, and maintained within the limits of the Diesel Fuel Oil Testing Program.

ADMINISTRATIVE CONTROLS

6.6.5 CORE OPERATING LIMITS REPORT (COLR) (Continued)

- 12) "Technical Manual for the CENTS Code," CENPD 282-P-A, February 1991 (Methodology for Specifications 3.1.1.1 and 3.1.1.2 for Shutdown Margin, 3.1.1.4 for MTC, 3.1.3.1 for CEA Position, 3.1.3.6 for Regulating and Group P Insertion Limits, and 3.2.4.b for DNBR Margin).
 - 13) Letter: O.D. Parr (NRC) to F.M. Stern (CE), dated June 13, 1975 (NRC Staff Review of the Combustion Engineering ECCS Evaluation Model). NRC approval for 6.6.5.b.4), 6.6.5.b.5), and 6.6.5.b.8) methodologies.
 - 14) Letter: O.D. Parr (NRC) to A.E. Scherer (CE), dated December 9, 1975 (NRC Staff Review of the Proposed Combustion Engineering ECCS Evaluation Model changes). NRC approval for 6.6.5.b.6) methodology.
 - 15) Letter: K. Kniel (NRC) to A.E. Scherer (CE), dated September 27, 1977 (Evaluation of Topical Reports CENPD-133, Supplement 3-P and CENPD-137, Supplement 1-P). NRC approval for 6.6.5.b.9) methodology.
 - 16) Letter: 2CNA038403, dated March 20, 1984, J.R. Miller (NRC) to J.M. Griffin (AP&L), "CESEC Code Verification." NRC approval for 6.6.5.b.11) methodology.
 - 17) "Calculative Methods for the CE Nuclear Power Large Break LOCA Evaluation Model," CENPD-132-P, Supplement 4-P-A, Revision 1 (Methodology for Specification 3.1.1.4 for MTC, 3.2.1 for Linear Heat Rate, 3.2.3 for Azimuthal Power Tilt, and 3.2.7 for ASI).
- c. The core operating limits shall be determined such that all applicable limits (e.g. fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling System (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

Attachment 4

Letter #

List of Regulatory Commitments

List of Regulatory Commitments

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

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (If Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
The details of the Diesel Fuel Oil Testing Program (DFOTP) and the details of the Ventilation Filter Testing Program (VFTP) will be maintained in site procedures.	X		Upon implementation
The details of design or process which are not directly pertinent to the actual requirement, i.e., Definition, Limiting Condition for Operation, or Surveillance Requirement, but rather describe additional unnecessary details such as an acceptable method of compliance will be relocated as follows. <u>CTS Location</u> <u>New Location</u> FOL 2.c.(6) SAR 4.7.6.1.2.a Bases, SR 4.7.6.1.2.a 4.7.6.1.2.d.2 Bases, SR 4.7.6.1.2.b 6.9.1.1 TRM 6.9.1.2 TRM 6.9.1.3 TRM	X		Upon implementation
Compliance details relating to the plant specific management position titles fulfilling the duties of generic positions will continue to be defined, established, documented, and updated in the ANO-2 Safety Analysis Report (SAR).		X	