

January 30, 2004

10 CFR 50.90

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

Duane Arnold Energy Center  
Docket 50-331  
License No. DPR-49

Monticello Nuclear Generating Plant  
Docket 50-263  
License No. DPR-22

Kewaunee Nuclear Power Plant  
Docket 50-305  
License No. DPR-43

Point Beach Nuclear Plant Units 1 and 2  
Dockets 50-266 and 50-301  
License Nos. DPR-24 and DPR-27

Palisades Nuclear Plant  
Docket 50-255  
License No. DPR-20

Prairie Island Nuclear Generating Plant Units 1 and 2  
Dockets 50-282 and 50-306  
License Nos. DPR-42 and DPR-60

Subject: Application for Technical Specification Improvement to Eliminate  
Requirements for Hydrogen Recombiners and Hydrogen/Oxygen Monitors  
Using the Consolidated Line Item Improvement Process

Pursuant to 10 CFR 50.90, Nuclear Management Company, LLC (NMC) hereby  
requests an amendment to the Technical Specifications (TS) for the above identified  
facilities.

The proposed amendment will delete the TS requirements related to hydrogen  
recombiners, and hydrogen/oxygen<sup>1</sup> monitors. The proposed TS changes support  
implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas  
Control System in Light-Water-Cooled-Power Reactors," that became effective on  
October 16, 2003. The changes are consistent with Revision 1 of NRC-approved  
Industry/Technical Specification Task Force (TSTF) Standard Technical Specification  
Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to  
Hydrogen and Oxygen Monitors." The availability of this TS improvement was  
announced in the *Federal Register* on September 25, 2003, as part of the consolidated  
line item improvement process (CLIIP).

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<sup>1</sup> References to Oxygen Monitors apply only to Duane Arnold Energy Center and Monticello Nuclear Generating  
Plant.

Enclosure 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications and commitments. Enclosure 2 provides site-specific clarifications to the TSTF-447 in conjunction with specifying the location of various changes to each facility's Technical Specifications. Enclosure 3 provides the existing TS pages marked-up to show the proposed change. Enclosure 4 provides revised, clean TS pages. Implementation of TSTF-447 also involves various changes to the TS Bases. The TS Bases changes will be implemented in accordance with each licensee's Technical Specifications (TS) Bases Control Program. In addition, as part of implementation of this change, each site will evaluate previous regulatory commitments, in accordance with approved guidance (SECY-00-0045, "Acceptance of NEI 99-04, Guidelines for Managing NRC Commitments"). The Staff will be notified of any such changes under separate cover, as necessary.

NMC requests approval of the proposed License Amendment by June 2004, with the amendment being implemented within 120 days after issuance of the amendment.

The TS pages submitted with this letter may be impacted by TS page changes in other license amendment requests. The marked up TS pages attached to this submittal do not contain incorporation of other proposed changes but reflect TS pages in their current approved state.

In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to each facility's designated State Official.

#### Summary of Commitments

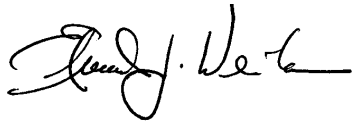
This letter makes the following new commitments:

- 1) NMC has verified that a hydrogen monitoring system capable of diagnosing beyond design-basis accidents is installed at each facility and is making a regulatory commitment to maintain that capability. The hydrogen monitors will be included in the specified document or program identified in Enclosure 1, Table 1. This regulatory commitment will be implemented by the implementation date.
- 2) NMC has verified that an oxygen monitoring system capable of verifying the status of the inerted containment is installed at Duane Arnold Energy Center and Monticello Nuclear Generating Plant and is making a regulatory commitment to maintain that capability. The oxygen monitors will be included in the specified document or program identified in Enclosure 1, Table 1. This regulatory commitment will be implemented by the implementation date.

If you should have any questions regarding this submittal, please contact John Fields, Senior Regulatory Affairs Engineer (763-295-1663).

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

Executed on January 30, 2004

A handwritten signature in black ink, appearing to read "Edward J. Weinkam". The signature is fluid and cursive, with the first name "Edward" being more prominent.

Edward J. Weinkam  
Director of Regulatory Services  
Nuclear Management Company, LLC

Enclosures (14)

cc: Regional Administrator, USNRC, Region III  
Project Managers, Office of Nuclear Reactor Regulation (Duane Arnold Energy Center, Kewaunee Nuclear Power Plant, Monticello Nuclear Generating Plant, Palisades Nuclear Plant, Point Beach Nuclear Plant, Prairie Island Nuclear Generating Plant)  
NRC Resident Inspectors (Duane Arnold Energy Center, Kewaunee Nuclear Power Plant, Monticello Nuclear Generating Plant, Palisades Nuclear Plant, Point Beach Nuclear Plant, Prairie Island Nuclear Generating Plant)  
State Consultation (Minnesota Department of Commerce, Lou Brandon - Chief - NFU/HWRPS/WHMD, Ms. Ave M Bie - Public Service Commission of WI, State of Iowa - D. McGhee

## ENCLOSURE 1

### Description and Assessment

#### 1.0 INTRODUCTION

The proposed License amendment deletes Technical Specification (TS) requirements for Hydrogen Recombiners and references to the hydrogen and oxygen<sup>1</sup> monitors in TS. These changes are numbered according to each facility's TS as identified in Table 1. The proposed TS changes support implementation of the revisions to 10 CFR 50.44, "Standards for Combustible Gas Control System in Light-Water-Cooled Power Reactors," that became effective on October 16, 2003. The revision of the requirements for the hydrogen recombiner and hydrogen/oxygen monitors resulted in numbering and formatting changes to other TS, which were otherwise unaffected by this proposed amendment.

The changes are consistent with Revision 1 of NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-447, "Elimination of Hydrogen Recombiners and Change to Hydrogen and Oxygen Monitors." The availability of this TS improvement was announced in the *Federal Register* on September 25, 2003, as part of the consolidated line item improvement process (CLIIP).

#### 2.0 DESCRIPTION OF PROPOSED AMENDMENT

Consistent with the NRC-approved Revision 1 of TSTF-447, the proposed TS changes include:<sup>2</sup>

Inoperable Hydrogen Monitors	Deleted
Containment Hydrogen Concentration Drywell H <sub>2</sub> & O <sub>2</sub> Analyzer Containment H <sub>2</sub> & O <sub>2</sub> Analyzer	Deleted
Hydrogen Recombiners	Deleted

Other TS changes included in this application are limited to renumbering and formatting changes that resulted directly from the deletion of the above requirements related to hydrogen recombiners and hydrogen and oxygen monitors.

As described in NRC-approved Revision 1 of TSTF-447, the changes to TS requirements and associated renumbering of other TSs results in changes to various TS Bases sections. The TS Bases changes will be implemented in accordance with each facility's TS Bases Control Program.

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<sup>1</sup> References to Oxygen Monitors apply only to Duane Arnold Energy Center and Monticello Nuclear Generating Plant.

<sup>2</sup> Each facility's unique TS Section Identification number is provided in Table 1 and in the applicable Enclosure 3(X).

### **3.0 BACKGROUND**

The background for this application is adequately addressed by the NRC Notice of Availability published on September 25, 2003 (68 FR 55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

### **4.0 REGULATORY REQUIREMENTS AND GUIDANCE**

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on September 25, 2003 (68 FR 55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

### **5.0 TECHNICAL ANALYSIS**

Nuclear Management Company, LLC (NMC) has reviewed the safety evaluation (SE) published on September 25, 2003 (68 FR 55416) as part of the CLIP Notice of Availability. This verification included a review of the NRC staff's SE, as well as the supporting information provided to support TSTF-447. NMC has concluded that the justifications presented in the TSTF proposal and the SE prepared by the NRC staff are applicable to each of the facilities identified in this amendment request and justify this amendment for the incorporation of the changes to each facility's TS.

### **6.0 REGULATORY ANALYSIS**

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on September 25, 2003 (68 FR 55416), TSTF-447, the documentation associated with the 10 CFR 50.44 rulemaking, and other related documents.

#### **6.1 Verification and Commitments**

As discussed in the model SE published in the *Federal Register* on September 25, 2003 (68 FR 55416) for this TS improvement, NMC is making the following verifications and regulatory commitments:

1. NMC has verified that a hydrogen monitoring system capable of diagnosing beyond design-basis accidents is installed at each facility and is making a regulatory commitment to maintain that capability. The hydrogen monitors will be included in the specified document or program identified in Table 1. This regulatory commitment will be implemented by the implementation date.
2. Kewaunee Nuclear Power Plant, Palisades Nuclear Plant, Point Beach Nuclear Plant Units 1 and 2, and Prairie Island Nuclear Generating Plant Units 1 and 2 do not have an inerted containment.

Duane Arnold Energy Center and Monticello Nuclear Generating Plant have an inerted containment. NMC has verified that an oxygen monitoring system capable of verifying the status of the inerted containment is installed at Duane Arnold Energy Center and Monticello Nuclear Generating Plant and is making a regulatory commitment to maintain that capability. The oxygen monitors will be included in the specified document or program identified in Table 1.

This regulatory commitment will be implemented by the implementation date.

## **7.0 NO SIGNIFICANT HAZARDS CONSIDERATION**

NMC has reviewed the proposed no significant hazards consideration determination published on September 25, 2003 (68 FR 55416) as part of the CLIIP. NMC has concluded that the proposed determination presented in the notice is applicable to each of the facilities identified in this amendment request and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

## **8.0 ENVIRONMENTAL EVALUATION**

NMC has reviewed the environmental evaluation included in the model SE published on September 25, 2003 (68 FR 55416) as part of the CLIIP. NMC has concluded that the staff's findings presented in that evaluation are applicable to each of the facilities identified in this amendment request and the evaluation is hereby incorporated by reference for this application.

## **9.0 PRECEDENT**

This application is being made in accordance with the CLIIP. NMC is not proposing variations or deviations from the TS changes described in TSTF-447 or the NRC staff's model SE published on September 25, 2003 (68 FR 55416). However, the unique characteristics of each facility's TS in relationship to TSTF-447 are identified and clarified in Enclosure 2. The differences between each facility's TS and TSTF-447 do not affect the no significant hazards consideration determination and environmental evaluation included in the model SE published on September 25, 2003 (68 FR 55416) as part of the CLIIP.

## **10.0 REFERENCES**

Federal Register Notice: Notice of Availability of Model Application Concerning Technical Specification Improvement To Eliminate Hydrogen Recombiner Requirement, and Relax the Hydrogen and Oxygen Monitor Requirements for Light Water Reactors Using the Consolidated Line Item Improvement Process, published September 25, 2003 (68 FR 55416).

**Table 1 – Site Specific Information**

<b>Facility *</b>	<b>Revised TS Section Identification numbers</b>	<b>Specified document or program for relocation of Hydrogen Monitors</b>	<b>Specified document or program for relocation of Oxygen Monitors</b>
<b>Duane Arnold Energy Center</b>	3.3.3.1	Technical Requirements Manual	Technical Requirements Manual <sup>(a)</sup>
<b>Kewaunee Nuclear Power Plant</b>	Table 3.5-6 Table 4.1-1	Technical Requirements Manual	N/A
<b>Monticello Nuclear Generating Plant</b>	3.7.E/4.7.E Table 3.14.1/4.14.1	Commitment Tracking Program	Commitment Tracking Program <sup>(a)</sup>
<b>Palisades Nuclear Plant</b>	3.3.7 Table 3.3.7-1 3.6.7	Commitment Management Program	N/A
<b>Point Beach Nuclear Plant</b>	3.3.3 Table 3.3.3-1 5.6.6	Technical Requirements Manual	N/A
<b>Prairie Island Nuclear Generating Plant</b>	3.3.3 Table 3.3.3-1 3.6.7 5.6.8	Technical Requirements Manual	N/A

\* Site-specific clarifications from TSTF-447, Rev. 1 are included and explained in Enclosure 2.

<sup>(a)</sup> Only the post-accident monitoring function will meet Regulatory Guide 1.97 (RG 1.97) and will be included in the Technical Requirements Manual or Commitment Tracking Program. Other, non-RG 1.97 instruments may be used to verify an inerted containment during normal power operations.

## ENCLOSURE 2

### SITE SPECIFIC CLARIFICATIONS FROM TSTF-447

The purpose of this enclosure is to provide site-specific clarifications to the TSTF-447 in conjunction with specifying the location of various changes to each facility's Technical Specifications. This enclosure augments discussions contained in Enclosure 1, Section 9.0 and Table 1.

#### Duane Arnold Energy Center

Duane Arnold Energy Center (DAEC) is not proposing any variations or deviations from the model Technical Specification (TS) changes for TSTF-447 Revision 1. However, due to minor differences between DAEC TS and the model TS in NUREG-1433, "Standard Technical Specifications, General Electric Plants BWR/4," Revision 2 in several cases small variances from the TSTF mark-up changes are necessary. These clarifications are discussed below and do not affect the adoption or application of TSTF-447, Revision 1.

1. In the TSTF mark-ups, STS 3.3.3.1, PAM Instrumentation, is modified by deleting a Note to Condition C, eliminating Condition D and re-numbering the following Conditions. DAEC TS do not have the Note in Condition C and do not include Condition D in the STS. Thus, these changes are not needed to adopt the TSTF.
2. In the TSTF mark-ups, STS Table 3.3.3.1-1, Post Accident Monitoring Instrumentation, deletes line items 10 and 11 for the Drywell and Containment H<sub>2</sub> and O<sub>2</sub> Analyzers, respectively. In DAEC Table 3.3.3.1-1, the equivalent line items are Items 7a and b and the same change is being made.
3. In the TSTF mark-ups, STS 3.6.3.1, Primary Containment Hydrogen Recombiners is deleted and the subsequent LCOs are re-numbered accordingly. DAEC TS do not have an equivalent section, so these changes are not needed in the DAEC TS to adopt the TSTF.
4. In the TSTF mark-ups, STS 5.6.7, Post Accident Monitoring Report, is modified based upon the changes described in Item 1 above. Because the DAEC TS do not require the Conditions in LCO 3.3.3.1 to be re-numbered, the DAEC TS do not require this change.



## **Kewaunee Nuclear Power Plant**

Kewaunee Nuclear Power Plant (KNPP) Technical Specifications (TS) have not been modified to the Improved Standard Technical Specifications included in NUREG-1431, "Standard Technical Specifications, Westinghouse Plants," Revision 2. Therefore, the following clarifications were made to accommodate the TSTF-447, Revision 1. These clarifications are discussed below and do not affect the adoption or application of TSTF-447, Revision 1.

1. In the TSTF mark-ups, STS Table 3.3.3.1-1, Post Accident Monitoring Instrumentation, deletes line item 11 for Hydrogen Monitors. KNPP TS refer to Hydrogen Monitors in TS Table 3.5-6, Item 7 as "Containment Hydrogen Monitor." This line item is being deleted as an equivalent change to the TSTF.

2. TS Table 3.5-6, Item 7, Containment Hydrogen Monitor, has an associated note (3), which states,

"With the number of OPERABLE accident monitoring instrumentation channels less than the required total number of channels shown, either restore the inoperable channels to OPERABLE status within 30 days or be in at least HOT STANDBY within the next 6 hours and HOT SHUTDOWN within the following 6 hours."

Since this note is only applicable to TS Table 3.5-6, Item 7, which is being deleted from the KNPP TS, the note is no longer required and may also be deleted. The proposed deletion is consistent with TSTF-447.

3. KNPP Table TS 4.1-1 "MINIMUM FREQUENCIES FOR CHECKS, CALIBRATIONS AND TEST OF INSTRUMENT CHANNELS," Item 38 is proposed for deletion.

Since the requirements for hydrogen monitors are being deleted from the KNPP TS, the supporting checks, calibrations, and tests for the hydrogen monitors is no longer required and may also be deleted. The proposed deletion is consistent with TSTF-447.

4. In the TSTF mark-ups, STS 3.6.8, "Hydrogen Recombiners", is deleted. Because the KNPP TS do not contain similar requirements, the KNPP TS do not require this change. Based on the revisions to 10 CFR 50.44 that became effective on October 16, 2003, KNPP will no longer require dedicated penetrations into containment for combustible gas control nor require the hydrogen recombiners to be available.

## Monticello Nuclear Generating Plant

Monticello Nuclear Generating Plant (MNGP) Technical Specifications (TS) have not been modified to the Improved Standard Technical Specifications included in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," Revision 2. Therefore, the following clarifications were made to accommodate the TSTF-447, Revision 1. These clarifications are discussed below and do not affect the adoption or application of TSTF-447, Revision 1.

1. MNGP TS Table of Contents indicate that "Combustible Gas Control System" is identified as subsection 3.7.E/4.7.E. This Table of Contents entry will be deleted. The TSTF does not include changes to the Table of Contents, but these changes are administrative in nature and are in keeping with the intent of TSTF-447, Revision 1.
2. In the TSTF mark-ups, STS 3.6.3.1, Primary Containment Hydrogen Recombiners is deleted and the subsequent LCOs are re-numbered accordingly. MNGP TS refer to the identical equipment as "Combustible Gas Control System." Therefore, the equivalent changes remove MNGP TS section 3.7.E/4.7.E.
3. In the TSTF mark-ups, STS Table 3.3.3.1-1, Post Accident Monitoring Instrumentation, deletes line items 10 and 11 for the Drywell and Containment H<sub>2</sub> and O<sub>2</sub> Analyzers, respectively. MNGP TS refer to the identical equipment in TS Table 3.14.1/4.14.1 as "Drywell and Suppression Pool Hydrogen and Oxygen Monitor." This line item is being deleted as an equivalent change to the TSTF.
4. In the TSTF mark-ups, STS 5.6.7, Post Accident Monitoring Report, is modified based upon the changes described in Item 3 above. Because the MNGP TS do not contain similar requirements, the MNGP TS do not require this change.

## **Palisades Nuclear Plant**

NMC is not proposing any variations or deviations from the model TS changes for TSTF-447, Revision 1. However, due to minor differences between Palisades TS and the model TS in NUREG-1432, "Standard Technical Specifications, Combustion Engineering Plants," Revision 2, in several cases small variances from the TSTF mark-up changes are necessary. These clarifications are discussed below and do not affect the adoption or application of TSTF-447, Revision 1.

1. In the TSTF mark-ups, STS 3.3.11, PAM Instrumentation, is modified by eliminating Condition D and renumbers the remaining Conditions. In Palisades TS 3.1.7, Condition D has been marked "not used" and the remaining Conditions have not been renumbered. This change is equivalent to the TSTF mark-up and will avoid unnecessary renumbering in supporting plant documents.
2. In the TSTF mark-ups, STS Table 3.3.11-1, Post Accident Monitoring Instrumentation, deletes line item 10 for the Containment Hydrogen Monitors and renumbers the remaining items. In Palisades Table 3.3.7-1, the equivalent line item, Item 7, has been marked as "deleted" and the remaining items have not been renumbered. This change is equivalent to the TSTF mark-up and will avoid unnecessary renumbering in supporting plant documents.
3. In the TSTF mark-ups, STS 3.6.13, Shield Building Exhaust Air Cleanup System (SEBEACS)(Dual), is renumbered as STS 3.6.8. Palisades TS do not have an equivalent section, so these changes are not needed in the Palisades TS to adopt the TSTF.
4. In the TSTF mark-ups, STS 5.6.7, Post Accident Monitoring Report, is modified to reflect changes made in the TSTF to the PAM Instrumentation Conditions. Palisades TS 5.6.6 does not have wording concerning specific PAM Instrumentation Condition numbers, so these changes are not needed in the Palisades TS to adopt the TSTF.

## Point Beach Nuclear Plant

Point Beach Nuclear Plant (PBNP)-specific clarifications are being proposed so as to eliminate differences between the existing PBNP TS and the Standard TS (NUREG-1431, Revision 2) on which TSTF-447 is based. This variation will align PBNP TS 3.3.3 with the Standard TS in accordance with TSTF-447.

Surveillance Requirement (SR) 3.3.3.2, and an associated note, are not separately listed in the Standard TS (nor in TSTF-447). This requirement and the associated note are being proposed for deletion. SR 3.3.3.2 states, "Calibrate gas portion of Hydrogen Monitor." The associated note, which precedes it, states, "SR 3.3.3.2 applies to Function 14 only." This SR and its associated note were supplementary requirements that were carried over from the former PBNP Custom TS, during the conversion to Improved TS, as a surveillance necessary to ensure the operability of the hydrogen monitors.

Since the requirements for hydrogen monitors are being deleted from the PBNP TS, the supporting SR for hydrogen monitors is no longer required and may also be deleted. The proposed deletion is consistent with TSTF-447.

TS Table 3.3.3-1, Item 14, Hydrogen Monitors, has an associated note (c), which states,

(c) Each monitor shall be powered from an independent power supply.

This note is not separately listed in the Standard TS (nor in TSTF-447). The note is being proposed for deletion. This note was a requirement that was carried over from the former PBNP Custom TS, during the conversion to Improved TS, as a plant-specific clarification of the requirements for the hydrogen monitors.

Since this note is only applicable to TS Table 3.3.3-1, Item 14, which is being deleted from the PBNP TS, the note is no longer required and may also be deleted. The proposed deletion is consistent with TSTF-447.

Other TS changes associated with this variation are limited to renumbering and formatting changes that resulted directly from the deletion of the above requirements related to hydrogen monitors. As a result of these plant-specific variations, the proposed changes to Point Beach TS 3.3.3 will make this specification consistent with TSTF-447.

## **Prairie Island Nuclear Generating Plant**

Prairie Island Nuclear Generating Plant (PINGP) is not proposing any variations or deviations from the model TS changes for TSTF-447 Revision 1. However, due to differences between PINGP TS and the model STS in NUREG-1431, "Standard Technical Specifications, Westinghouse Plant," Revision 2 in several cases variances from the TSTF mark-up changes are necessary. These clarifications are discussed below and do not affect the adoption or application of TSTF-447, Revision 1.

### **LCO 3.3.3**

PINGP LCO 3.3.3, [Event Monitoring] EM Instrumentation, Actions Table is formatted differently than NUREG-1431 and TSTF-447. In the PINGP TS mark-ups, LCO 3.3.3 is modified by revising the Note to Condition D, eliminating Condition E and re-lettering the following Conditions. These changes are necessary to remove the hydrogen monitors from the TS.

PINGP Surveillance Requirement (SR) includes SR 3.3.3.2 which the SR Table Note clarifies is only applicable to Function 11 (Hydrogen Monitors). This SR is being proposed for deletion and the SR Table Note is proposed to be conformed to the guidance of NUREG-1431. SR 3.3.3.3 is proposed to be re-numbered as SR 3.3.3.2. Neither the Standard TS nor TSTF-447 identifies a separate SR for the Hydrogen Monitors. This SR, and the SR Table Note clarification, were supplementary requirements that were carried over from the former PINGP custom TS, during the conversion to Improved TS, as a surveillance necessary to ensure the operability of the hydrogen monitors. Since the requirements for Hydrogen Monitors are being removed from the PINGP TS, the supporting SR for Hydrogen Monitors is no longer required and may also be deleted. The proposed deletion is consistent with TSTF-447.

Table 3.3.3-1 mark-up differs from TSTF-447 in that, Item 11 is shown as "Not used" and the subsequent Item numbers remain unchanged.

### **LCO 3.6.7**

The PINGP TS are numbered differently than NUREG-1431 for Westinghouse plants. The TSTF-447 changes in LCO 3.6.8, "Hydrogen Recombiners" apply to PINGP TS LCO 3.6.7.

### **TS 5.6.8**

The PINGP TS are numbered differently than NUREG-1431 for Westinghouse plants. The TSTF-447 changes in TS 5.6.7, "EM Report" apply to PINGP TS 5.6.8. The specific reference to LCO 3.3.3 differs from TSTF-447 due to the different format of LCO 3.3.3 discussed above.

## **ENCLOSURE 3**

**The following Proposed Technical Specification Changes (Markups) are contained within Enclosure 3:**

**Enclosure 3A - Duane Arnold Energy Center**

**Enclosure 3B - Kewaunee Nuclear Power Plant**

**Enclosure 3C - Monticello Nuclear Generating Plant**

**Enclosure 3D - Palisades Nuclear Plant**

**Enclosure 3E - Point Beach Nuclear Plant Units 1 and 2**

**Enclosure 3F - Prairie Island Nuclear Generating Plant Units 1 and 2**

**ENCLOSURE 3A**

**Proposed Technical Specification Changes (Markup)**

**Duane Arnold Energy Center**

**ENCLOSURE 3B**

**Proposed Technical Specification Changes (Markup)**

**Kewaunee Nuclear Power Plant**



**ENCLOSURE 3C**

**Proposed Technical Specification Changes (Markup)**

**Monticello Nuclear Generating Plant**

**ENCLOSURE 3D**

**Proposed Technical Specification Changes (Markup)**

**Palisades Nuclear Plant**

**ENCLOSURE 3E**

**Proposed Technical Specification Changes (Markup)**

**Point Beach Nuclear Plant Units 1 and 2**

**ENCLOSURE 3F**

**Proposed Technical Specification Changes (Markup)**

**Prairie Island Nuclear Generating Plant Units 1 and 2**

## **ENCLOSURE 4**

**The following Final Technical Specification Pages are contained within  
Enclosure 4:**

**Enclosure 4A - Duane Arnold Energy Center**

**Enclosure 4B - Kewaunee Nuclear Power Plant**

**Enclosure 4C - Monticello Nuclear Generating Plant**

**Enclosure 4D - Palisades Nuclear Plant**

**Enclosure 4E - Point Beach Nuclear Plant Units 1 and 2**

**Enclosure 4F - Prairie Island Nuclear Generating Plant Units 1 and 2**

**ENCLOSURE 4A**

**Proposed Technical Specification Pages**

**Duane Arnold Energy Center**

**ENCLOSURE 4B**

**Proposed Technical Specification Pages**

**Kewaunee Nuclear Power Plant**

**ENCLOSURE 4C**

**Proposed Technical Specification Pages**

**Monticello Nuclear Generating Plant**



**ENCLOSURE 4D**

**Proposed Technical Specification Pages**

**Palisades Nuclear Plant**

**ENCLOSURE 4E**

**Proposed Technical Specification Pages**

**Point Beach Nuclear Plant Units 1 and 2**

**ENCLOSURE 4F**

**Proposed Technical Specification Pages**

**Prairie Island Nuclear Generating Plant Units 1 and 2**