

February 27, 2004

NG-04-0111

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

REFERENCE: B. Mozafari (USNRC) to G. Van Middlesworth (NMC), "Duane Arnold Energy Center – Issuance of Amendment Regarding Extended Power Uprate (TAC No. MB0543), dated November 6, 2001.

SUBJECT: License Amendment Request (TSCR – 056): "Elimination of License Condition 2.C.(2)(b) for Performance of Large Transient Tests for Extended Power Uprate"

Pursuant to 10 CFR 50.90, the Nuclear Management Company, LLC (NMC) is submitting a license amendment request to change the Operating License for the Duane Arnold Energy Center (DAEC). The proposed amendment would remove license condition 2.C.(2)(b) to perform large transient testing as part of the Extended Power Uprate (EPU) power ascension testing program at the DAEC. This license condition was added by the referenced amendment, after extensive negotiation with the Staff, as described more fully in Enclosure I to this letter.

Enclosure I provides a description of the proposed change, the supporting technical analysis, evaluation of No Significant Hazards Consideration pursuant to 10 CFR 50.92, and the Environmental Considerations of this action pursuant to 10 CFR 51.22. Enclosure II provides a mark-up of the existing license page to show the proposed change.

NMC is requesting that this application be approved by March 1, 2005 to support startup from the next scheduled refuel outage. Modifications are planned during that outage that will allow reactor power to be increased above the license condition threshold requiring performance of the Main Steam Line Isolation Valve (MSIV) closure transient test as part of power ascension testing from that outage. NMC requests an implementation period of 30 days after NRC issuance of the approved amendment.

This proposed change has been approved by the DAEC Operations Committee.

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In accordance with 10 CFR 50.91, a copy of this application, with Enclosures, is being provided to the designated state official.

There are no new regulatory commitments being made in this letter.

Please contact Tony Browning of my Staff at (319) 851-7750, if you have any questions regarding this application.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on February 27, 2004.



Mark Peifer
Site Vice President, Duane Arnold Energy Center

cc: J. Caldwell, Regional Administrator, USNRC Region III
D. Beaulieu, Project Manager, Office of Nuclear Reactor Regulation
NRC Resident Inspector Office
D. McGhee, State of Iowa

Enclosures: I) LICENSEE'S EVALUATION
II) PROPOSED OPERATING LICENSE PAGE 4 (markup)

LICENSEEE'S EVALUATION

Subject: Deletion of License Condition 2.C.(2)(b)

1. Description of Change
2. Technical Analysis
3. Regulatory Analysis
 - a. No Significant Hazards Consideration Evaluation
 - b. Applicable Regulatory Requirements Evaluation
4. Environmental Considerations

1. Description of Change: Proposed Change to the Duane Arnold Energy Center
Operating License (TSCR-056)

The holders of Operating License DPR-49 for the Duane Arnold Energy Center propose to amend that license by deleting the referenced page and replacing it with the enclosed new page (Enclosure II to this letter).

<u>Page</u>	<u>Description of Change</u>
Operating License Page 4	Delete License Condition 2.C.(2)(b) for Performance of Large Transient Tests for Extended Power Uprate

2. Technical Analysis

A. Background

In its original application for Extended Power Uprate (EPU) (Reference 1), Nuclear Management Company, LLC proposed to deviate from the General Electric Company (GE) approved topical report for EPU applications, referred to as ELTR-1, by not performing the large transient testing specified in ELTR-1. Specifically, NMC proffered the argument that the large transient tests, i.e., a Main Steamline Isolation Valve Closure (MSIVC) and Generator Load Rejection (GLR) tests from full licensed power level, were not required to be performed to demonstrate acceptable operation at the EPU power level. As part of our justification, we cited the precedence of the NRC's approval of the EPUs for Hatch Units 1 and 2 without the requirement to perform these tests.

Subsequently, the NRC Staff issued a Request for Additional Information (RAI) to NMC, requesting additional justification for not performing these tests. In its reply (Reference 2) NMC provided that additional justification; however, in that response, NMC committed to either perform these tests or to seek regulatory relief at a later date. This commitment was proposed to expedite the Staff's review of NMC's EPU application, as the first phase of EPU implementation at the DAEC would not reach the specified power levels for performing these large transient tests, and it was known that this issue was being dispositioned on another licensee's docket in parallel with NMC's application.

When preparing the typed pages for the license amendment for the DAEC EPU application (Reference 3), the Staff requested that NMC convert the above commitment into a license condition. NMC complied with the Staff's request, withdrew the commitment and accepted the license condition.

Subsequent to the approval of the DAEC's EPU application, the Staff has approved all other Boiling Water Reactor (BWR) EPUs without the requirement for

large transient testing. To date, no domestic BWR has performed these tests as part of EPU power ascension testing. One foreign BWR has performed large transient tests of a similar nature, with no anomalies observed.

When the ELTR was written, GE attempted to capture all feasible approaches for achieving an EPU of 20% from original licensed thermal power. This included EPUs with and without an increase in steady state reactor dome pressure. However, most licensees, including NMC, have opted for the "no pressure increase EPU," as this greatly simplifies the technical issues that must be addressed in the safety analysis. Consequently, GE submitted a topical report that discusses the simplified approach of a no pressure increase EPU, i.e., a Constant Pressure Power Uprate (CPPU). This topical report is referred to as the CLTR. One of the simplifications in the CPPU approach is that the large transient tests, which are both pressurization transients, are not required as part of the power ascension testing program. In the CLTR approval process, GE provided the generic justification for not requiring the large transient tests for a CPPU plant. While the Staff did not take exception to GE's technical arguments, they did defer resolution of the issue to the Standard Review Plan (SRP) for EPUs, then under development (Reference 4).

The Staff subsequently published draft SRP Chapter 14.2.1, "Generic Guidelines for Extended Power Uprate Testing Programs." In Section III, Part C, the Staff provided their guidelines for not performing specific tests. These will be addressed below.

B. Technical Justification

DAEC Operating Experience

In our RAI response (Reference 2), NMC provided our operating experience with unplanned transients of a similar nature that were experienced prior to the EPU, which demonstrated that the unit performed as expected, per the design. The DAEC's operating experience is similar to the other BWRs that have been granted EPUs without the requirement to perform this transient testing.

The MSIVC and GLR are both pressurization transients caused by a fast shutoff of steamflow from the reactor vessel, from closure of the MSIVs and Turbine Control Valves, respectively. The transient severity is primarily determined by the initial operating pressure and rate of pressure increase, i.e., valve closure times. Rated reactor power, i.e., rated steamflow, has a noticeable, but secondary effect on the rate of pressure increase. NMC has implemented the DAEC EPU without a reactor pressure increase, or shortening the shutoff valve stroke times (i.e., made them close faster). While the Turbine Control Valves were modified from "full arc" to "partial arc" admission (i.e., a change in the valve stroke characteristics) as part of EPU, the effect of this modification is to slow down the rate of pressure increase, i.e., the rate of steamflow cutoff is now less severe than prior to the EPU. In

addition, no modifications to the major structures, systems or components used to mitigate these transients, such as the Safety/Relief Valves or Turbine Bypass Valves, have been made. Only rated steamflow has been affected by EPU.

Consequently, NMC continues to believe that the DAEC would perform consistent with its operating experience if the DAEC were to experience such an unplanned transient sometime in the future. Thus, performing these large transient tests as part of the power ascension testing for EPU would yield no new useful information.

DAEC EPU Power Ascension Testing Experience

As described in detail in Reference 5, NMC performed the power ascension testing program for EPU up to the current steady state operating power level of 1790 MWt (an increase in power of 8% from the previous licensed power level of 1658 MWt.) As noted in the report, while minor equipment problems were encountered during the testing, the Expert Panel concluded that the plant exhibited acceptable operation at 1790 MWt and recommended steady state operation at this level. No issues were encountered that would invalidate our previous operating experience with these large transients or warrant their being performed in the next phase of EPU implementation at DAEC.

As there are current operational issues at other EPU plants, which appear to be caused by flow-induced vibration and subsequent failure of components, NMC will specifically discuss the DAEC vibration monitoring program. As described in Reference 1, Power Uprate Safety Analysis Report (PUSAR) Section 10.4.3, the DAEC power ascension test program for EPU includes vibration monitoring of main steam and feedwater piping. As noted in our startup test report, Reference 5, Section 6.3.2, DAEC has not exhibited abnormal vibration of these piping systems. In fact, only one monitored location exhibited vibration above the "negligible" range and was well within the "acceptable" range. As part of the power ascension testing program, NMC will monitor main steam and feedwater piping vibration as power level is increased in the next phase of EPU at DAEC.

Similarity to other BWRs granted exception to large transient testing

As noted earlier, all other BWRs with approved EPUs (see Table - 1) have been granted exception to performing the large transient tests specified in ELTR-1. The justifications provided by those plants are fundamentally generic in nature and are applicable to any GE-designed BWR. NMC, in Reference 2, provided many of these same arguments, in particular those relating to the benchmarking of the transient analysis models.

Nothing is unique about the DAEC design or operation that would make the previously-provided justifications not applicable to the DAEC.

Table – 1
Plants with Approved EPU*s

Plant Name	Docket No.	EPU TAC No.
Brunswick, Unit 1	50-325	MB2700
Brunswick, Unit 2	50-324	MB2701
Clinton	50-461	MB2210
Dresden, Unit 2	50-237	MB0844
Dresden, Unit 3	50-249	MB0845
Hatch, Unit 1	50-321	M99393
Hatch, Unit 2	50-366	M99394
Quad Cities, Unit 1	50-254	MB0842
Quad Cities, Unit 2	50-265	MB0843

* Monticello was granted an EPU in 1998; however, they did not increase thermal power above the ELTR threshold for performing the large transients tests. Thus, they did not request exception to this ELTR requirement.

C. Conformance to Draft Standard Review Plan, Chapter 14.2.1 on EPU Testing Programs

As specified in Section III, Part C, Item 2 of the draft SRP, the following factors are to be considered when requesting to not include specific testing in the EPU power ascension test program.

a. Previous Operating Experience

As discussed above, the DAEC has experienced both of these transients at the previous licensed power level. No abnormalities or deviations from predicted behavior were observed. No modifications have been performed as part of EPU implementation that would cause the DAEC to behave significantly different from previous operating experience. While the Turbine Control Valves were modified from "full arc" to "partial arc" admission (i.e., a change in the valve stroke characteristics) as part of EPU, the effect of this modification is to slow down the rate of pressure increase, i.e., the rate of steamflow cutoff is now less severe than prior to the EPU. In addition, early in plant life, the DAEC operated in "partial arc" mode and converted to "full arc" in the mid-80's. Thus, the DAEC has prior operating experience with the turbine valves in partial arc mode, including turbine/generator trip events.

Also, as noted in Reference 2, Plant Hatch has experienced the GLR transient at uprated conditions without anomalies. Plant Hatch and the DAEC are fundamentally the same design (BWR/4's with Mark I

containments), including turbine valve control systems. Thus, the Hatch experience is germane to the DAEC.

b. Introduction of New Thermal-Hydraulic Phenomena or Identified System Interactions

The major EPU modification to the DAEC was to modify the main steam flow path from the reactor to the turbine-generator to accommodate the higher steamflow due to EPU. A new, more efficient high-pressure turbine was installed and the turbine control valves were converted to partial arc mode. However, neither of these modifications introduces new thermal-hydraulic phenomena in the plant, nor do they introduce new or different system interactions that would warrant performing the GLR testing. As noted above, the conversion to partial arc admission lessens the severity of the GLR event from operation in full arc admission. In addition, no instrument setpoints were modified that initiate equipment relied upon to mitigate this event, such as the turbine control valve fast closure signal that initiates a reactor scram.

No equipment modifications were made during EPU that would impact the MSIVC transient. Specifically, MSIV stroke times were not changed, nor were the opening settings of the safety/relief valves (S/RVs). No instrument setpoints were modified that initiate equipment that are relied upon to mitigate this event, such as the MSIV closure signal that initiates a reactor scram.

As discussed above, while the higher steam flows associated with EPU have caused industry events due to flow-induced vibration phenomena, NMC has a monitoring program for the main steam and feedwater piping systems and the DAEC operating experience at the current power level does not indicate that abnormal flow-induced vibrations are occurring. However, based upon the industry experience, NMC will continue to monitor these piping systems for vibration in the next phase of EPU implementation and testing.

c. Facility Conformance to Limitations Associated with Analytical Analysis Methods

GE's analytical model for analyzing transients (ODYN) and associated methods (GEMINI) have been proven to acceptably predict plant behavior during these particular pressurization transients, including the DAEC, even at EPU conditions (e.g., the Hatch events noted above). These methods are routinely used in the analysis of core reloads that form the basis for the Core Operating Limits Report (COLR). No new limitations on these methods have been imposed as a result of EPU implementation.

d. Plant Staff Familiarization with Facility Operation and Trial Use of Operating and Emergency Operating Procedures

The Staff has previously reviewed and approved NMC's process for updating the plant operating procedures (normal and off-normal), training (including plant simulator), and human factors aspects of the DAEC's EPU implementation.

e. Margin Reduction in Safety Analysis Results for Anticipated Operational Occurrences

One of the benefits of a "no-pressure increase EPU" is that the severity of these particular transients is not significantly impacted by the increased power level/steamflow. For example, the increase in peak pressure from pre-EPU to EPU from a GLR transient, with failure of the turbine bypass valves (the bounding case), was less than 1%. Similarly for the MSIVC transient, with associated failure of the direct valve position scram (the bounding case), the increase in peak pressure was less than 3%. Thus, there is not a significant reduction in safety margin from these bounding transients due to EPU.

f. Guidance Contained in Vendor Topical Reports

As discussed in the Background section, GE has updated their original topical report for EPU (i.e., the ELTR), for constant pressure uprates (i.e., the CLTR), to no longer specify the requirement for performing these large transient tests as part of power ascension testing. While the DAEC EPU was not licensed to the CLTR, it is a CPPU, thus, this specific aspect of the CLTR is applicable to the DAEC.

g. Risk Implications

While this application is not "risk-informed," NMC believes, on a qualitative basis, that the benefits from performing these tests are negligible, when assessed against the risks of subjecting the plant to an otherwise unnecessary challenge.

D. Conclusion

Based upon all the above information, NMC does not believe that the risk of performing these large transient tests is warranted in light of the limited value of the information that would be gained from their performance. In addition, granting this application is consistent with current regulatory practice, based upon the guidelines in the draft SRP chapter, and the precedence of the other licensees that have been granted EPU applications subsequent to the DAEC that did not require these tests as part of their power ascension testing program.

E. References

1. G. Van Middlesworth (NMC) to USNRC, "Technical Specification Change Request (TSCR-042): 'Extended Power Uprate'," NG-00-1900, November 16, 2000. Included as Attachment 6, NEDC-32980P, "Safety Analysis Report for Duane Arnold Energy Center Extended Power Uprate," November 2000.
2. G. Van Middlesworth (NMC) to USNRC, "Response to Request for Additional Information (RAI) to Technical Specification Change Request TSCR-042 – Extended Power Uprate. (TAC # MB0543)," NG-01-0764, June 11, 2001.
3. G. Van Middlesworth (NMC) to USNRC, "Final Typed Pages for Technical Specification Change Request TSCR-042 – Extended Power Uprate. (TAC # MB0543)," NG-01-1198, October 12, 2001.
4. W. Ruland (USNRC) to J. Klapproth (GE), "Review of GE Nuclear Energy Licensing Topical Report, NEDC-33004P, Revision 3, 'Constant Pressure Power Uprate' (TAC No. MB2510)," March 31, 2003.
5. K. Putnam (NMC) to USNRC, "Startup Test Report for Extended Power Uprate – Phase I, NG-02-0187, March 4, 2002.
6. USNRC, NUREG-0800, Standard Review Plan 14.2.1, "Generic Guidelines for Extended Power Uprate Testing Programs," Draft Rev. 0, December 2002.

3. Regulatory Analysis

a. No Significant Hazards Consideration Evaluation

Background:

In its original application for a license amendment for an Extended Power Uprate (EPU) for the Duane Arnold Energy Center (DAEC), Nuclear Management Company, LLC (NMC) took a deviation from the NRC-approved General Electric Company (GE) licensing topical report for EPU applications (i.e., ELTR-1) to not perform the large transient tests as part of the power ascension testing program required for EPU implementation.

During the NRC Staff's review of this submittal, NMC accepted the Staff's inclusion of a license condition requiring these large transient tests to be performed as part of the implementation of the EPU power ascension testing program. NMC accepted that license condition to expedite the Staff's review of the application, as the first phase of EPU implementation at the DAEC would not reach the specified power levels for performing these large transient tests, and it was known that this issue was being dispositioned on another licensee's docket in parallel with NMC's application.

NMC is preparing to implement the next phase of EPU at the DAEC during the next scheduled refuel outage in March, 2005. This phase will increase the thermal power level above that specified in the license condition for performing the main steam line isolation valve (MSIV) closure transient test. Therefore, NMC is requesting that the license condition requiring this test, as well as the generator load reject transient test, be removed prior to plant startup from that refuel outage.

Nuclear Management Company, LLC, Docket No. 50-331,
Duane Arnold Energy Center, Linn County, Iowa
Date of Amendment Request: February 27, 2004

Description of Amendment Request:

The proposed licensing action would remove license condition 2.C.(2)(b), which requires specific large transient tests to be performed as part of the DAEC Extended Power Uprate power ascension testing program.

Basis for proposed No Significant Hazards Consideration:

The Commission has provided standards (10 CFR Section 50.92(c)) for determining whether a significant hazards consideration exists. A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

After reviewing this proposed amendment, NMC has concluded:

- 1) The proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The requested licensing action would remove the current requirement to perform specific large transient tests as part of the DAEC EPU power ascension testing program. No other changes are proposed. Therefore, the probability of an accident previously evaluated is not significantly increased.

The proposed action will not affect any System, Structure or Component designed for the mitigation of previously analyzed events. The proposed change does not affect the source term, containment isolation, or radiological release assumptions used in evaluating the radiological consequences of any accident previously evaluated. Thus, the proposed

change will not increase the consequences of any previously evaluated accident.

- 2) The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The requested licensing action would remove the current requirement to perform specific large transient tests as part of the DAEC EPU power ascension testing program. No other changes are proposed. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

- 3) The proposed amendment will not involve a significant reduction in a margin of safety.

Performance of these specific large transient tests is not necessary to ensure acceptable plant operation at the higher thermal power level. Simple, integrated systems tests are performed in lieu of the complex, challenging large transient tests. Other required testing of the specific SSCs that have been modified for EPU ensures that the plant will respond as expected during any abnormal operating event, including these specific transients. Thus, the proposed elimination of the large transient tests will not significantly reduce any margin of safety from that previously approved for EPU operation at the DAEC.

Based upon the above, NMC has determined that the proposed amendment will not involve a significant hazards consideration.

Attorney for Licensee: Jonathan Rogoff, Esquire, General Counsel, NMC, LLC,
700 First St., Hudson, WI, 54016.

b. Applicable Regulatory Requirements Evaluation

10 CFR 50, Appendix B, Criterion XI, "Test Control" specifies that a testing program be established that demonstrates that plant SSCs will perform satisfactorily in service and that written test procedures are developed which incorporate the requirements and acceptance limits contained in applicable design documents.

DAEC UFSAR Section 14.2 describes the plant's startup testing program, which includes the EPU power ascension testing program (UFSAR 14.2.14.1). As stated therein, this program complies with the DAEC Quality Assurance Program, Section 17.2.14.6, which implements Criterion XI of Appendix B.

As discussed in the previous sections of this Enclosure, NMC believes that performance of these large transient tests is not necessary to demonstrate acceptable plant operation at EPU conditions. Therefore, the elimination of large transient tests from the DAEC EPU testing program is not inconsistent with the objectives of the Appendix B requirements for Test Control.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

4. Environmental Considerations

10 CFR Section 51.22(c)(9) identifies certain licensing and regulatory actions which are eligible for categorical exclusion from the requirement to perform an environmental assessment. A proposed amendment to an operating license for a facility requires no environmental assessment if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant hazards consideration; (2) result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite; and (3) result in a significant increase in individual or cumulative occupational radiation exposure.

NMC has reviewed this request and determined that the proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(9). The basis for this determination follows:

Basis

The change meets the eligibility criteria for categorical exclusion set forth in 10 CFR Section 51.22(c)(9) for the following reasons:

1. As demonstrated in Section 3 of this Enclosure, the proposed amendment does not involve a significant hazards consideration.
2. The proposed change does not involve modifications to the radioactive waste processing systems or to radioactive waste effluent monitors. The requested change will not impact the amount of radioactive waste produced by the facility. Accordingly, the changes do not require the radioactive waste processing systems to perform any different function than they are currently designed to perform nor do they change the operation or testing of any such system. Therefore, this change will not result in a significant change in the types or significant increase in the amounts of any effluents that may be released offsite.

3. The proposed change will not alter the way the plant or its systems are normally operated, maintained, or tested. The request will eliminate a current one-time test requirement. Therefore, this change will not result in a significant increase in individual or cumulative occupational radiation exposure.

Pursuant to 10 CFR Section 51.22(b), no environmental impact statement or environmental assessment needs to be prepared in connection with the issuance of the amendment.

- (a) For Surveillance Requirements (SRs) whose acceptance criteria are modified, either directly or indirectly, by the increase in authorized maximum power level in 2.C.(1) above, in accordance with Amendment No. 243 to Facility Operating License DPR-49, those SRs are not required to be performed until their next scheduled performance, which is due at the end of the first surveillance interval that begins on the date the Surveillance was last performed prior to implementation of Amendment No. 243.

(b) The licensee will perform the generator load reject and full main steamline isolation valve closure transients tests required by the General Electric Licensing Topical Report for Extended Power Uprate (NEDC-32424P-A) - ELTR-1, including the allowances described in Section L.2.4 (2) of ELTR-1 regarding credit for unplanned plant transient events, using the thermal power level (1688 MWt) to establish ELTR-1 power level limits. The testing shall be performed at an initiating power level greater than the steady-state operation power level exceeding the respective ELTR-1 power level limit for each transient.

(3) Fire Protection

NMC shall implement and maintain in effect all provisions of the approved fire protection program as described in the Final Safety Analysis Report for the Duane Arnold Energy Center and as approved in the SER dated June 1, 1978, and Supplement dated February 10, 1981, subject to the following provision:

NMC may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

- (4) The licensee is authorized to operate the Duane Arnold Energy Center following installation of modified safe-ends on the eight primary recirculation system inlet lines which are described in the licensee letter dated July 31, 1978, and supplemented by letter dated December 8, 1978.

(5) Physical Protection

NMC shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain Safeguards Information protected under 10 CFR 73.21, are entitled: "Duane Arnold Energy Center Security Plan," with revisions submitted through December 17, 1987; "Duane Arnold Energy Center Guard Training and Qualification Plan," with revisions submitted through October 18, 1985; and "Duane Arnold Energy Center Safeguards Contingency Plan," with revisions submitted through December 5, 1986. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

**PROPOSED OPERATING LICENSE PAGE 4
(markup)**