VOLUME 16

CNP UNITS 1 AND 2
IMPROVED TECHNICAL SPECIFICATIONS CONVERSION

ITS CHAPTER 5.0
ADMINISTRATIVE CONTROLS

Revision 0

LIST OF ATTACHMENTS

1. ITS 5.1
2. ITS 5.2
3. ITS 5.3
4. ITS 5.4
5. ITS 5.5
6. ITS 5.6
7. ITS 5.7
8. Relocated/Deleted Current Technical Specifications (CTS)

ATTACHMENT 1

ITS 5.1, Responsibility

Current Technical Specification (CTS) Markup and Discussion of Changes (DOCs)

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

5.1 6.1 RESPONSIBILITY

5.1.1 6.1.1 The Plant Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

INSERT 1

LA.1

M.1

5.1.2 6.1.2 The Shift Manager (or during his absence from the control room complex, a designated individual) shall be responsible for the control room command function. A management directive to this effect signed by the Site Vice President shall be reissued to all station personnel on an annual basis.

M.2

A.2

6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATIONS

6.2.1 Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management level through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the UFSAR and updated in accordance with 10 CFR 50.71(e).

See ITS 5.2

b. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. The Senior Vice President - Nuclear Operations shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

ITS

M.1

INSERT 1

5.1.1 The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affects nuclear safety.

Insert Page 6-1

A.1

ITS 5.1

ITS

6.0 ADMINISTRATIVE CONTROLS

5.1 6.1 RESPONSIBILITY

5.1.1 6.1.1 The Plant Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

INSERT 1

5.1.2 6.1.2 The Shift Manager (or during his absence from the control room complex, a designated individual) shall be responsible for the control room command function. A management directive to this effect signed by the Site Vice President shall be reissued to all station personnel on an annual basis.

LA.1

M.1

M.2

A.2

6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATIONS

6.2.1 Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management level through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the UFSAR and updated in accordance with 10 CFR 50.71(e).

See ITS 5.2

b. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. The Senior Vice President - Nuclear Operations shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

Attachment 1, Volume 16, Rev. 0, Page 7 of 256

ITS

M.1

INSERT 1

5.1.1 The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affects nuclear safety.

Insert Page 6-1

DISCUSSION OF CHANGES
ITS 5.1, RESPONSIBILITY

ADMINISTRATIVE CHANGES

A.1 In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.

A.2 CTS 6.1.2 requires a management directive regarding delegation of the control room command function to be signed by the Site Vice President and issued to all station personnel on an annual basis. ITS 5.1.2 does not include this requirement. This changes the CTS by deleting the requirement to issue this management directive annually.

The purpose of CTS 6.1.2 is to specify the plant specific means of implementing the requirement to notify employees of the responsibilities of the Shift Manager. This change is acceptable because CTS 6.1.2 and ITS 5.1.2 state who is responsible for the control room command function. This requirement appears to serve only as a reminder to personnel as to who is in charge. No where else in the CTS or the ITS is a management directive required to remind personnel of a Technical Specification requirement. In addition, this requirement is not considered to be one of the more important requirements since it does not directly impact safety. The Technical Specification control room command function requirement is not being changed. This change is designated as administrative because it does not result in technical changes to the CTS.

MORE RESTRICTIVE CHANGES

M.1 ITS 5.1.1 requires that the plant manager or his designee approve, prior to implementation, each proposed test, experiment, or modification to systems or equipment that affects nuclear safety. The CTS does not include this requirement. This changes the CTS by adding an approved requirement for the plant manager or his designee.

The purpose of the ITS 5.1.1 requirement is to provide additional assurance that the plant manager has direct responsibility for overall unit operation. This change is acceptable because having the plant manager or his designee approve actions affecting nuclear safety is consistent with the CTS 6.2.1.b (ITS 5.2.1.b) requirement that the plant manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant. This change is designated more restrictive because it adds a requirement for the plant manager or his designee to the CTS.

M.2 CTS 6.1.2 allows a designated individual to assume the responsibility for the control room command function when the Shift Manager is absent from the control room complex. ITS 5.1.2 provides the allowance for the designated

Attachment 1, Volume 16, Rev. 0, Page 9 of 256

individual to assume the responsibility for the control room command function, but provides additional requirements for the designated individual. In MODE 1, 2, 3, or 4, ITS 5.1.2 requires the designated individual hold an active Senior Operator license. In MODE 5 or 6, ITS 5.1.2 requires the designated individual hold an active Senior Operator license or Operator license. This changes the CTS by adding qualification requirements for the designated individual that assumes the control room command function.

The purpose of the ITS 5.1.2 requirement is to ensure that the control room command function is maintained. This change is acceptable because the additional requirements ensure that the designated individual assuming the control room command functions meets the appropriate qualification requirements. This change is designated as more restrictive because it adds qualification requirements for the designated individual that assumes the control room command function to the CTS.

RELOCATED SPECIFICATIONS

None

REMOVED DETAIL CHANGES

LA.1 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements)* CTS 6.1.1 uses the title "Plant Manager" and CTS 6.1.2 uses the title "Shift Manager." ITS 5.1.1 uses the generic title "plant manager" and ITS 5.1.2 uses the generic title "shift manager." This changes the CTS by moving the specific CNP organizational titles to the UFSAR and replacing them with generic titles.

The removal of these details, which are related to meeting Technical Specification requirements, from the Technical Specifications is acceptable because this type of information is not necessary to be included in Technical Specifications to provide adequate protection of public health and safety. The allowance to relocate the specific CNP organizational titles is out of the Technical Specifications is consistent with the NRC letter from C. Grimes to the Owners Groups Technical Specification Committee Chairmen, dated November 10, 1994. The various requirements of the plant manager and shift manager are still retained in the ITS. Also, this change is acceptable because the removed information will be adequately controlled in the UFSAR. Any changes to the UFSAR are made under 10 CFR 50.59 or 10 CFR 50.71(e), which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because information related to meeting Technical Specification requirements are being removed from the Technical Specifications.

LESS RESTRICTIVE CHANGES

None

Attachment 1, Volume 16, Rev. 0, Page 10 of 256

Improved Standard Technical Specifications (ISTS) Markup and Justification for Deviations (JFDs)

CTS

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

- REVIEWER'S NOTES -

1. Titles for members of the unit staff shall be specified by use of an overall statement referencing an ANSI Standard acceptable to the NRC staff from which the titles were obtained, or an alternative title may be designated for this position. Generally, the first method is preferable; however, the second method is adaptable to those unit staffs requiring special titles because of unique organizational structures.

2. The ANSI Standard shall be the same ANSI Standard referenced in Section 5.3, Unit Staff Qualifications. If alternative titles are used, all requirements of these Technical Specifications apply to the position with the alternative title as apply with the specified title. Unit staff titles shall be specified in the Final Safety Analysis Report or Quality Assurance Plan. Unit staff titles shall be maintained and revised using those procedures approved for modifying/revising the Final Safety Analysis Report or Quality Assurance Plan.

6.1.1

5.1.1 The plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

DOC M.1

The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.

6.1.2

5.1.2 The Shift Supervisor (SS) shall be responsible for the control room command function. During any absence of the SS from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the SS from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

manager
shift manager
complex
shift manager
Senior Operator

JUSTIFICATION FOR DEVIATIONS
ITS 5.1, RESPONSIBILITY

1. The brackets are removed and the proper plant specific information/value is provided.

2. Grammatical error corrected.

3. Typographical error corrected. The terms in 10 CFR 55.4 and 10 CFR 50.54(m) are "Senior Operator" and "Operator."

4. The term "control room" in ISTS 5.1.2 has been changed to "control room complex" to be consistent with the current licensing basis.

Attachment 1, Volume 16, Rev. 0, Page 13 of 256

Specific No Significant Hazards Considerations (NSHCs)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 5.1, RESPONSIBILITY

There are no specific NSHC discussions for this Specification.

Attachment 1, Volume 16, Rev. 0, Page 15 of 256

ATTACHMENT 2

ITS 5.2, Organization

Current Technical Specification (CTS) Markup and Discussion of Changes (DOCs)

ITS 5.2

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Manager (or during his absence from the control room complex, a designated individual) shall be responsible for the control room command function. A management directive to this effect signed by the Site Vice President shall be reissued to all station personnel on an annual basis.

See ITS 5.1

5.2 6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATIONS

5.2.1 6.2.1 Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

5.2.1.a a. Lines of authority, responsibility, and communication shall be established and defined for the highest management level through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the UFSAR and updated in accordance with 10 CFR 50.71(e).

INSERT 1

M.1

A.2

5.2.1.b b. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

LA.1

A specified corporate officer

5.2.1.c c. The Senior Vice President - Nuclear Operations shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

LA.1

5.2.1.d d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

ITS

M.1 **INSERT 1**

5.2.1.a requirements including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications

Insert Page 6-1

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

6.2 ORGANIZATION (Continued)

FACILITY STAFF

5.2.2 6.2.2 The Facility organization shall be subject to the following:

a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1. — LA.2

b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in Mode 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room. — A.3

5.2.2.c c. An individual* qualified in radiation protection procedures shall be on site when fuel is in the reactor.

d. All CORE ALTERATIONS shall be directly supervised by a licensed Senior Operator trained or qualified in refueling and CORE ALTERATIONS (SO-CA) who has no other concurrent responsibilities during this operation. — A.3

5.2.2.d e. The amount of overtime worked by plant staff members performing safety-related functions must be limited in accordance with NRC Policy Statement on working hours (Generic Letter 82-12). — LA.3

f. The Shift Manager and Unit Supervisor shall hold a Senior Operator License. — operations manager — LA.1

5.2.2.e g. The Operations Director must hold or have held a Senior Operator License at Cook Nuclear Plant or a similar reactor, or have been certified for equivalent senior operator knowledge. If the Operations Director does not hold a Senior Operator License, then a line (*v.* staff) operations middle manager shall hold a Senior Operator License for the purposes of directing operational activities. — A.1

operations manager — LA.1

5.2.2.c * The unexpected absence, for a period of time not to exceed 2 hours, of the on-site individual qualified in radiation protection procedures is permitted provided immediate action is taken to fill the required position.

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION*

LICENSE CATEGORY	APPLICABLE MODES	
	1, 2, 3 & 4	5 & 6
SM	1**	1**#
SOL	1	None
OL	2	1
Non-Licensed	2	1
Shift Technical Adv.	1**	None

LA.2

5.2.2.a

5.2.2.f

INSERT 2

M.2

LA.2

Does not include the licensed Senior Operator - CA supervising CORE ALTERATIONS.

5.2.2.b

* Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1.

5.2.2.f

** Shared with Cook Nuclear Plant Unit 2.

ITS

M.2 **INSERT 2**

5.2.2.f An individual shall provide advisory technical support to unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit.

Insert Page 6-3

ITS 5.2

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Plant Radiation Protection Manager, who shall meet or exceed qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents and, (3) the Operations Director, who must be qualified as specified in Section 6.2.2.g.

See ITS 5.3

5.2.2.f

A.4

See ITS 5.3

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.

See CTS 6.0

6.5 DELETED

Attachment 1, Volume 16, Rev. 0, Page 23 of 256

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Manager (or during his absence from the control room complex, a designated individual) shall be responsible for the control room command function. A management directive to this effect signed by the Site Vice President shall be reissued to all station personnel on an annual basis.

See ITS 5.1

5.2 6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATIONS

5.2.1 6.2.1 Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

5.2.1.a a. Lines of authority, responsibility, and communication shall be established and defined for the highest management level through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the UFSAR and updated in accordance with 10 CFR 50.71(e).

INSERT 1

M.1

A.2

5.2.1.b b. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

LA.1

A specified corporate officer

5.2.1.c c. The Senior Vice President - Nuclear Operations shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.

LA.1

5.2.1.d d. The individuals who train the operating staff and those who carry out health physics and quality assurance functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.

ITS

M.1 **INSERT 1**

5.2.1.a requirements including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications

Insert Page 6-1

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

6.2 ORGANIZATION (Continued)

FACILITY STAFF

5.2.2 6.2.2 The Facility organization shall be subject to the following:

a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1. — LA.2

b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in Mode 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room. — A.3

5.2.2.c c. An individual* qualified in radiation protection procedures shall be on site when fuel is in the reactor.

d. All CORE ALTERATIONS shall be directly supervised by a licensed Senior Operator trained or qualified in refueling and CORE ALTERATIONS (SO-CA) who has no other concurrent responsibilities during this operation. — A.3

5.2.2.d e. The amount of overtime worked by plant staff members performing safety-related functions must be limited in accordance with NRC Policy Statement on working hours (Generic Letter 82-12).

f. The Shift Manager and Unit Supervisor shall hold a Senior Operator License. — LA.3

operations manager — LA.1

5.2.2.e g. The Operations Director must hold or have held a Senior Operator License at Cook Nuclear Plant or a similar reactor, or have been certified for equivalent senior operator knowledge. If the Operations Director does not hold a Senior Operator License, then a line (*v.* staff) operations middle manager shall hold a Senior Operator License for the purposes of directing operational activities. — A.1

operations manager — LA.1

5.2.2.c * The unexpected absence, for a period of time not to exceed 2 hours, of the on-site individual qualified in radiation protection procedures is permitted provided immediate action is taken to fill the required position.

ITS 5.2

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION*

LICENSE CATEGORY	APPLICABLE MODES	
	1, 2, 3 & 4	5 & 6
SM	1**	1**
SOL	1	None
OL	2	1
Non-Licensed	2	1
Shift Technical Adv.	1**	None

LA.2

5.2.2.a

5.2.2.f

INSERT 2

M.2

LA.2

Does not include the licensed Senior Operator - CA supervising CORE ALTERATIONS.

5.2.2.b

* Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1.

5.2.2.f

** Shared with Cook Nuclear Plant Unit 1

ITS

M.2 **INSERT 2**

5.2.2.f An individual shall provide advisory technical support to unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to safe operation of the unit.

Insert Page 6-3

ITS 5.2

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Plant Radiation Protection Manager, who shall meet or exceed qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents and, (3) the Operations Director, who must be qualified as specified in Section 6.2.2.g.

See ITS 5.3

A.4

See ITS 5.3

5.2.2.f

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.

See CTS 6.0

6.5 DELETED

Attachment 1, Volume 16, Rev. 0, Page 29 of 256

DISCUSSION OF CHANGES
ITS 5.2, ORGANIZATION

ADMINISTRATIVE CHANGES

A.1 In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.

A.2 CTS 6.2.1.a states, in part, "These organizational charts will be documented in the UFSAR and updated in accordance with 10 CFR 50.71(e)." The ITS does not include the requirement associated with updating the UFSAR in accordance with 10 CFR 50.71(e). This changes the CTS by deleting these requirements for updating the UFSAR.

10 CFR 50.71(e) provides requirements for periodically updating the UFSAR. This change is acceptable because the requirements deleted from the Technical Specifications are already required by 10 CFR 50.71(e). This change is designated as administrative because it does not result in technical changes to the CTS.

A.3 CTS 6.2.2.b states "At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in Mode 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room." CTS 6.2.2.d requires all CORE ALTERATIONS to be directly supervised by a licensed Senior Operator trained or qualified in refueling and CORE ALTERATIONS who has no other concurrent responsibilities during this operation. The ITS does not include these requirements. This changes the CTS by deleting these requirements.

10 CFR 50.54(m)(2)(iii) states "When a nuclear power unit is in an operational mode other than cold shutdown or refueling, as defined by a unit's technical specifications, each licensee shall have a person holding a senior operator license for the nuclear power unit in the control room at all times. In addition to this senior operator, for each fueled nuclear power unit, a licensed operator or senior operator shall be at the controls at all times." 10 CFR 50.54(m)(2)(iv) states "Each licensee shall have present, during alteration of the core of a nuclear power unit (including fuel loading or transfer), a person holding a senior operator license or a senior operator license limited to fuel handling to directly supervise the activity and, during this time, the licensee shall not assign other duties to this person." This change is acceptable because the requirements deleted from the Technical Specifications are already required by 10 CFR 50.54(m)(2)(iii) and 10 CFR 50.54(m)(2)(iv). This change is designated as administrative because it does not result in technical changes to the CTS.

A.4 CTS 6.3.1 provides, in part, qualification requirements for the Shift Technical Advisor (STA), and requires the STA to have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents. ITS 5.2.2.f requires this individual to meet the qualification requirements of the Commission

Attachment 1, Volume 16, Rev. 0, Page 30 of 256

DISCUSSION OF CHANGES
ITS 5.2, ORGANIZATION

Policy Statement on Engineering Expertise on Shift. This changes the CTS by referencing the Commission Policy Statement on Engineering Expertise on Shift for qualification requirements instead of listing the specific qualification requirements.

The purpose of the CTS 6.3.1 STA requirements is to specify the minimum qualification requirements for the STA. This change is acceptable because the qualification requirements included in the Commission Policy Statement on Engineering Expertise on Shift encompass the current STA qualification requirements. This change is designated as administrative because it does not result in technical changes to the CTS.

MORE RESTRICTIVE CHANGES

M.1 CTS 6.2.1.a, regarding documentation and updating of the relationships between operating organization positions, requires the organizational charts to be documented in the UFSAR. ITS 5.2.1.a states "These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the UFSAR." This changes the CTS by requiring that the specific CNP organizational titles be specified in the UFSAR.

This change is acceptable because specifying the relationship of the specific CNP organizational titles to the generic titles used in the Technical Specifications and industry standards in the UFSAR continues to ensure that organizational positions and associated responsibilities will be maintained. This change adds this requirement to the Technical Specifications. This change is designated as more restrictive because it requires additional information be maintained in the UFSAR.

M.2 CTS Table 6.2-1 requires the minimum shift crew to include one STA (shared between Units 1 and 2) when the unit is in MODE 1, 2, 3, or 4. ITS 5.2.2.f requires, in part, that an individual (shared between Units 1 and 2) provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit, when the unit is in MODE 1, 2, 3, or 4. This changes the CTS by detailing the specific responsibilities of the STA.

The purpose of the CTS Table 6.2-1 STA requirements is to ensure that appropriate engineering expertise is available on shift. This change is acceptable because it clarifies STA requirements consistent with Commission Policy Statement on Engineering Expertise on Shift. This change is designated as more restrictive because it provides specific details of the responsibilities of the STA.

RELOCATED SPECIFICATIONS

None

Attachment 1, Volume 16, Rev. 0, Page 31 of 256

DISCUSSION OF CHANGES
ITS 5.2, ORGANIZATION

REMOVED DETAIL CHANGES

LA.1 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements)* CTS 6.2.1.b uses the title "Plant Manager," CTS 6.2.1.c uses the title "Senior Vice President - Nuclear Operations," and CTS 6.2.2.g uses the title "Operations Director." ITS 5.2.1.b uses the generic title "plant manager," ITS 5.2.1.c uses the generic title "A specified corporate officer," and ITS 5.2.2.e uses the generic title "operations manager." This changes the CTS by moving the specific CNP organizational titles to the UFSAR and replacing them with generic titles.

The removal of these details, which are related to meeting Technical Specification requirements, from the Technical Specifications is acceptable because this type of information is not necessary to be included in Technical Specifications to provide adequate protection of public health and safety. The allowance to relocate the specific CNP organizational titles out of the Technical Specifications is consistent with the NRC letter from C. Grimes to the Owners Groups Technical Specification Committee Chairmen, dated November 10, 1994. The various requirements of the plant manager, the specified corporate officer, and the operations manager are still retained in the ITS. Also, this change is acceptable because the removed information will be adequately controlled in the UFSAR. Any changes to the UFSAR are made under 10 CFR 50.59 or 10 CFR 50.71(e), which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because information related to meeting Technical Specification requirements are being removed from the Technical Specifications.

LA.2 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements)* CTS 6.2.2 and Table 6.2-1, including footnote #, provide minimum shift crew composition requirements. ITS 5.2.2 only includes the minimum shift crew composition requirements that are not already included in 10 CFR 50.54. This changes the CTS by moving the minimum shift crew composition requirements addressed by 10 CFR 50.54 to the Technical Requirements Manual (TRM).

The removal of these details, which are related to meeting Technical Specification requirements, from the Technical Specifications is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. The minimum shift crew composition requirements for licensed operators and senior operators are also contained in 10 CFR 50.54(k), (l), and (m) and do not need to be repeated in the Technical Specifications. The minimum shift crew composition requirements for non-licensed operators are transferred from CTS Table 6.2-1 to ITS 5.2.2.a and the minimum shift crew composition requirements for the STA are transferred from CTS Table 6.2-1 to ITS 5.2.2.f. The relocation of the details of the minimum shift crew composition requirements to the TRM is acceptable considering the controls provided by regulations and the remaining requirements in the Technical Specifications. Also, this change is acceptable because these details will be adequately controlled in the TRM. Any changes to the TRM are made under 10 CFR 50.59, which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail

Attachment 1, Volume 16, Rev. 0, Page 32 of 256

change because details for meeting Technical Specification and regulatory requirements are being removed from the Technical Specifications.

LA.3 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements)* CTS 6.2.2.f requires the Shift Manager and Unit Supervisor to hold a Senior Operator license. ITS 5.2.2 does not contain this requirement. This changes the CTS by moving the requirement for the Shift Manager and Unit Supervisor to hold a Senior Operator license to the TRM.

The removal of these details, which are related to meeting Technical Specification requirements, from the Technical Specifications is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. The requirement for shift supervision to hold Senior Operator licenses is contained in 10 CFR 50.54(m), and does not need to be repeated in the Technical Specifications. The relocation of the details of the shift supervision personnel that are required to hold Senior Operator licenses to the TRM is acceptable considering the controls provided by regulations. Also, this change is acceptable because these details will be adequately controlled in the TRM. Any changes to the TRM are made under 10 CFR 50.59, which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because details for meeting Technical Specification and regulatory requirements are being removed from the Technical Specifications.

LESS RESTRICTIVE CHANGES

None

Improved Standard Technical Specifications (ISTS) Markup and Justification for Deviations (JFDs)

CTS

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

6.2.1

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

6.2.1.a

a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the UFSAR, QA Plan, (1) (3) (3) (2) (5) (4)

6.2.1.b

b. The plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant,

6.2.1.c

c. A specified corporate officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety, and

6.2.1.d

d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

Table 6.2-1

a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODES 1, 2, 3, or 4. (3)

- REVIEWER'S NOTE -
Two unit sites with both units shutdown or defueled require a total of three non-licensed operators for the two units. (4)

Attachment 1, Volume 16, Rev. 0, Page 35 of 256

CTS

5.2 Organization

5.2.2 Unit Staff (continued)

Specifications (8)

Table 6.2-1 Note *

b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

6.2.2.c and Note *

c. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

6.2.2.e

d. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., [licensed Senior Reactor Operators (SROs), licensed Reactor Operators (ROs), health physicists, auxiliary operators, and key maintenance personnel]).

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.

Any deviation from the above guidelines shall be authorized in advance by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not be assigned.

(5) INSERT 1

(6)

6.2.2.g

e. The operations manager or assistant operations manager shall hold an SRO license.

INSERT 2

Table 6.2-1 and Note **

6.3.1

f. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

INSERT 3 (7)

Attachment 1, Volume 16, Rev. 0, Page 36 of 256

5 **INSERT 1**

The amount of overtime worked by unit staff members performing safety related functions must be limited in accordance with the NRC Policy Statement on working hours (Generic Letter 82-12).

6 **INSERT 2**

must hold or have held a Senior Operator license at Cook Nuclear Plant or a similar reactor, or have been certified for equivalent Senior Operator knowledge. If the operations manager does not hold an Senior Operator license, then a line operations middle manager shall hold a Senior Operator license for the purposes of directing operational activities.

7 **INSERT 3**

In MODE 1, 2, 3, or 4, an individual (shared with Unit 2 (Unit 1) and Unit 1 (Unit 2))

JUSTIFICATION FOR DEVIATIONS
ITS 5.2, ORGANIZATION

1. ISTS 5.2.1.a is revised to reflect the CNP CTS with respect to documentation and updating of the relationships between operating organization positions. Specifically, the ISTS 5.2.1.a requirement for including these relationships in functional descriptions of departmental responsibilities and relationships, and job descriptions of key personnel positions, or in equivalent forms of documentation is not included in ITS 5.2.1.a. This change is made to achieve consistency with CTS 6.2.1.a, which was approved by the NRC in License Amendments 132 (Unit 1) and 117 (Unit 2), dated March 9, 1990.

2. The brackets are removed and the proper plant specific information/value is provided.

3. Grammatical/typographical error corrected.

4. The ISTS Reviewer's Note has been deleted since it is not intended to be included in the ITS. The requirements for non-licensed operators for two unit sites addressed in the ISTS Reviewer's Note are not adopted. This change is consistent with the CNP CTS.

5. ISTS 5.2.2.d provides requirements for working hour limitations. These requirements are revised in ITS 5.2.2.d to reflect the CNP CTS 6.2.2.e requirements, which were approved by the NRC in License Amendments 77 (Unit 1) and 58 (Unit 2), dated November 23, 1983.

6. ISTS 5.2.2.e provides a requirement for the operations manager or the assistant operations manager to hold a Senior Operator license. This requirement is revised in ITS 5.2.2.e to reflect the CNP CTS 6.2.2.g requirements. The CTS 6.2.2.g requirements were approved by the NRC in License Amendments 212 (Unit 1) and 197 (Unit 2), dated November 13, 1996.

7. ISTS 5.2.2.f provides requirements for the Shift Technical Advisor (STA). These requirements are revised in ITS 5.2.2.f to reflect the CNP CTS Table 6.2-1 requirements for the STA. The CTS Table 6.2-1 STA requirements were approved by the NRC in License Amendments 49 (Unit 1) and 34 (Unit 2), dated August 25, 1981.

8. The referenced requirements are Specifications, not Code of Federal Regulations (CFR) requirements. Therefore, the word "Specifications" has been added to clearly state that 5.5.2.a and 5.5.2.f are Specifications.

Attachment 1, Volume 16, Rev. 0, Page 38 of 256

Specific No Significant Hazards Considerations (NSHCs)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 5.2, ORGANIZATION

There are no specific NSHC discussions for this Specification.

Attachment 1, Volume 16, Rev. 0, Page 40 of 256

ATTACHMENT 3

ITS 5.3, Unit Staff Qualifications

Current Technical Specification (CTS) Markup and Discussion of Changes (DOCs)

ITS 5.3

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

5.3

6.3 FACILITY STAFF QUALIFICATIONS

5.3.1

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Plant Radiation Protection Manager, who shall meet or exceed qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents and, (3) the Operations Director who must be qualified as specified in Section 6.2.2.g.

manager

LA.1

See ITS 5.2

LA.1

Add proposed Specification 5.3.2

A.2

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.

See CTS 6.0

6.5 DELETED

Attachment 1, Volume 16, Rev. 0, Page 43 of 256

ITS 5.3

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

5.3

6.3 FACILITY STAFF QUALIFICATIONS

5.3.1

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Plant Radiation Protection Manager, who shall meet or exceed qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents and, (3) the Operations Director, who must be qualified as specified in Section 6.2.2.g.

manager

LA.1

See ITS 5.2

LA.1

Add proposed Specification 5.3.2

A.2

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.

See CTS 6.0

6.5 DELETED

Attachment 1, Volume 16, Rev. 0, Page 44 of 256

DISCUSSION OF CHANGES
ITS 5.3, UNIT STAFF QUALIFICATIONS

ADMINISTRATIVE CHANGES

A.1 In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.

A.2 ITS 5.3.2 states "For the purpose of 10 CFR 55.4, a licensed Senior Operator and a licensed Operator are those individuals who, in addition to meeting the requirements of Specification 5.3.1, perform the functions described in 10 CFR 50.54(m)." The CTS does not include such a statement. This changes the CTS by clarifying that these individuals must meet all of the qualification requirements referenced in 10 CFR 55.4, ITS 5.3.1, and 10 CFR 50.54(m).

This change is acceptable because it clarifies the existing relationship between the Technical Specifications and regulations regarding licensed Senior Operator and Operator qualification requirements. This change is designated as administrative because it does not result in technical changes to the CTS.

MORE RESTRICTIVE CHANGES

None

RELOCATED SPECIFICATIONS

None

REMOVED DETAIL CHANGES

LA.1 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements)* CTS 6.3.1 uses the titles "Plant Radiation Protection Manager" and "Operations Director." ITS 5.3.1 uses the generic titles "radiation protection manager" and "operations manager." This changes the CTS by moving the specific CNP organizational titles to the UFSAR and replacing them with generic titles.

The removal of these details, which are related to meeting Technical Specification requirements, from the Technical Specifications is acceptable because this type of information is not necessary to be included in Technical Specifications to provide adequate protection of public health and safety. The allowance to relocate the specific CNP organizational titles out of the Technical Specifications is consistent with the NRC letter from C. Grimes to the Owners Groups Technical Specification Committee Chairmen, dated November 10, 1994. The various requirements of the radiation protection manager and the operations

Attachment 1, Volume 16, Rev. 0, Page 45 of 256

DISCUSSION OF CHANGES
ITS 5.3, UNIT STAFF QUALIFICATIONS

manager are still retained in the ITS. Also, this change is acceptable because the removed information will be adequately controlled in the UFSAR. Any changes to the UFSAR are made under 10 CFR 50.59 or 10 CFR 50.71(e), which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because information related to meeting Technical Specification requirements are being removed from the Technical Specifications.

LESS RESTRICTIVE CHANGES

None

Attachment 1, Volume 16, Rev. 0, Page 46 of 256

Improved Standard Technical Specifications (ISTS) Markup and Justification for Deviations (JFDs)

CTS

5.0 ADMINISTRATIVE CONTROLS

6.3 5.3 Unit Staff Qualifications

- REVIEWER'S NOTE -

Minimum qualifications for members of the unit staff shall be specified by use of an overall qualification statement referencing an ANSI Standard acceptable to the NRC staff or by specifying individual position qualifications. Generally, the first method is preferable; however, the second method is adaptable to those unit staffs requiring special qualification statements because of unique organizational structures.

(1)

6.3.1 5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of [Regulatory Guide 1.8, Revision 2, 1987, or more recent revisions, or ANSI Standard acceptable to the NRC staff]. [The staff not covered by Regulatory Guide 1.8 shall meet or exceed the minimum qualifications of Regulations, Regulatory Guides, or ANSI Standards acceptable to NRC staff].

(2) INSERT 1

DOC A.2 5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of LS 5.3.1, perform the functions described in 10 CFR 50.54(m).

(3) Specification

(4)

(2)

INSERT 1

ANSI N18.1-1971 for comparable positions, except for the radiation protection manager and the operations manager. The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. The operations manager shall be qualified as required by Specification 5.2.2.e.

Attachment 1, Volume 16, Rev. 0, Page 49 of 256

JUSTIFICATION FOR DEVIATIONS
ITS 5.3, UNIT STAFF QUALIFICATIONS

1. The ISTS Reviewer's Note has been deleted since it is not intended to be included in the ITS.

2. The brackets are removed and the proper plant specific information/value is provided.

3. Grammatical/typographical error corrected. The terms in 10 CFR 55.4 and 10 CFR 50.54(m) are "Senior Operator" and "Operator."

4. Change made for consistency with the terminology used in other Specifications.

Attachment 1, Volume 16, Rev. 0, Page 50 of 256

Specific No Significant Hazards Considerations (NSHCs)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 5.3, UNIT STAFF QUALIFICATIONS

There are no specific NSHC discussions for this Specification.

Attachment 1, Volume 16, Rev. 0, Page 52 of 256

ATTACHMENT 4

ITS 5.4, Procedures

Current Technical Specification (CTS) Markup and Discussion of Changes (DOCs)

ITS 5.4

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

5.4 6.8 PROCEDURES AND PROGRAMS — See ITS 5.5

5.4.1 6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

5.4.1.a a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.

b. Deleted. — Add proposed Specification 5.4.1.b — M.1

c. Deleted.

d. PROCESS CONTROL PROGRAM implementation. — LA.1

5.4.1.e e. OFFSITE DOSE CALCULATION MANUAL implementation. — A.2

5.4.1.c f. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974, and Regulatory Guide 4.1, Rev. 1, April 1975. — LA.2

5.4.1.e g. Component Cyclic or Transient Limits program, which provides controls to track the UFSAR, Section 4.1, cyclic and transient occurrences to ensure that components are maintained within the limits. — A.2

5.4.1.d h. Fire Protection Program implementation.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes, shall be reviewed prior to implementation as set forth in Quality Assurance Program Description, Appendix C, Section 6.5. — LA.3

6.8.3 Deleted.

Add proposed Specification 5.4.1.e — M.2

Attachment 1, Volume 16, Rev. 0, Page 55 of 256

ITS 5.4

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

5.4 6.8 PROCEDURES AND PROGRAMS — See ITS 5.5

5.4.1 6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

5.4.1.a a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.

b. Deleted. — Add proposed Specification 5.4.1.b — M.1

c. Deleted.

d. PROCESS CONTROL PROGRAM implementation. — LA.1

5.4.1.e e. OFFSITE DOSE CALCULATION MANUAL implementation. — A.2

5.4.1.c f. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974, and Regulatory Guide 4.1, Rev. 1, April 1975. — LA.2

5.4.1.e g. Component Cyclic or Transient Limits program, which provides controls to track the UFSAR, Section 4.1, cyclic and transient occurrences to ensure that components are maintained within the limits. — A.2

5.4.1.d h. Fire Protection Program implementation.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes, shall be reviewed prior to implementation as set forth in Qualification Assurance Program Description, Appendix C, Section 6.5. — LA.3

6.8.3 Deleted.

Add proposed Specification 5.4.1.e — M.2

Attachment 1, Volume 16, Rev. 0, Page 56 of 256

DISCUSSION OF CHANGES
ITS 5.4, PROCEDURES

ADMINISTRATIVE CHANGES

A.1 In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.

A.2 CTS 6.8.1.e requires procedures for implementation of the OFFSITE DOSE CALCULATION MANUAL (ODCM) and CTS 6.8.1.g requires procedures for the implementation of the Component Cyclic or Transient Limits Program. ITS 5.4.1 requires procedures for various activities, but does not specifically list the ODCM and the Component Cyclic or Transient Limits Program. This changes the CTS by removing the explicit requirements for written procedures for implementation of the ODCM and the Component Cyclic or Transient Limits Program.

This change is acceptable because implementing procedures for the ODCM and the Component Cyclic or Transient Limits Program are required by ITS 5.4.1.e. ITS 5.4.1.e (added as described in DOC M.2) requires that written procedures be established, implemented, and maintained for all programs and manuals in ITS 5.5 (including the ODCM and Component Cyclic or Transient Limits Program). Therefore, it is not necessary to specifically identify each program in ITS 5.4.1. This change is designated as administrative because it does not result in technical changes to the CTS.

MORE RESTRICTIVE CHANGES

M.1 ITS 5.4.1.b requires that written procedures shall be established, implemented, and maintained for the emergency operating procedures required to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33. The CTS does not include this requirement. This changes the CTS by adopting a new requirement for emergency operating procedures.

The purpose of ITS 5.4.1.b is to ensure that written procedures are established, implemented, and maintained covering the emergency operating procedures to implement the requirements of NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33. This change is acceptable because it is consistent with an existing requirement to comply with NUREG-0737 and NUREG-0737, Supplement 1, as stated in Generic Letter 82-33, for emergency operating procedures. This change is designated more restrictive because it imposes a new requirement for procedures within the Technical Specifications.

M.2 ITS 5.4.1.e requires that written procedures shall be established, implemented, and maintained for all programs specified in Specification 5.5. The CTS does not include this requirement for any program except the ODCM and the Component

Attachment 1, Volume 16, Rev. 0, Page 57 of 256

DISCUSSION OF CHANGES
ITS 5.4, PROCEDURES

Cyclic or Transient Limits Program. This changes the CTS by adopting a new requirement for procedures to address all programs described in ITS 5.5.

The purpose of ITS 5.4.1.e is to ensure that written procedures are established, implemented, and maintained covering all programs specified in ITS 5.5. This change is considered acceptable because it requires written procedures, including proper procedure control to address programs required by ITS 5.5. This change is designated more restrictive because it imposes new requirements for procedures within the Technical Specifications.

RELOCATED SPECIFICATIONS

None

REMOVED DETAIL CHANGES

LA.1 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements)* CTS 6.8.1.d requires that written procedures for the PROCESS CONTROL PROGRAM (PCP) be established, implemented, and maintained. The ITS does not include these requirements. This changes the CTS by moving the requirements to the UFSAR.

The removal of these details, which are related to meeting Technical Specification requirements, from the Technical Specifications is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. The PCP implements the requirements of 10 CFR 20, 10 CFR 61, and 10 CFR 71. Compliance with these regulations is required by the CNP Units 1 and 2 Operating Licenses, and written procedures are necessary to ensure compliance with the program. Regulations provide an adequate level of control for the affected requirements, and inclusion of this requirement in the Technical Specifications is not necessary. Also, this change is acceptable because these details will be adequately controlled in the UFSAR. Any changes to the UFSAR are made under 10 CFR 50.59 or 10 CFR 50.71(e), which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because details for meeting Technical Specification and regulatory requirements are being removed from the Technical Specifications.

LA.2 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements)* CTS 6.8.1.f requires written procedures be established, implemented and maintained covering the Quality Assurance Program for effluent and environmental monitoring, "using the guidance in Regulatory Guide 1.21, Revision 1, June 1974, and Regulatory Guide 4.1, Revision 1, April 1975." ITS 5.4.1.c does not include the Regulatory Guide references. This changes the CTS by moving the references to the Regulatory Guides to the Quality Assurance Program Description (QAPD).

The removal of these details, which are related to meeting Technical Specification requirements, from the Technical Specifications is acceptable

Attachment 1, Volume 16, Rev. 0, Page 58 of 256

because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. The ITS still retains the requirement for written procedures covering quality assurance for effluent and environmental monitoring. Also, this change is acceptable because these types of procedural details will be adequately controlled in the QAPD. Any changes to the QAPD are made under 10 CFR 50.54(a), which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because references for meeting Technical Specification requirements are being removed from the Technical Specifications.

LA.3 *(Type 3 – Removing Procedural Details for Meeting TS or Reporting Requirements)* CTS 6.8.2 requires that each procedure and administrative policy of Specification 6.8.1, and changes to these documents, including temporary changes, be reviewed prior to implementation in accordance with the QAPD. ITS 5.4 does not include this requirement. This changes the CTS by moving these details of procedure and administrative policy reviews to the QAPD.

The removal of these details, which are related to meeting Technical Specification requirements, from the Technical Specifications is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. ITS 5.4.1 still retains the requirement for written procedures required by the Technical Specifications to be established, implemented, and maintained. Regulations provide an adequate level of control for the affected review requirement. The requirements for establishment, maintenance, and implementation of procedures related to activities affecting quality are contained in 10 CFR 50, Appendix B, Criterion II and Criterion V and ANSI N18.7-1976 (ANS 3.2-1976). In accordance with these requirements, the QAPD includes adequate detail with respect to administrative control of procedures related to activities affecting quality and nuclear safety, including the review requirements associated with maintenance of these procedures. Also, this change is acceptable because these types of procedural details will be adequately controlled in the QAPD. Any changes to the QAPD are made under 10 CFR 50.54(a), which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because references for meeting Technical Specification and regulatory requirements are being removed from the Technical Specifications.

LESS RESTRICTIVE CHANGES

None

Improved Standard Technical Specifications (ISTS) Markup and Justification for Deviations (JFDs)

CTS

5.0 ADMINISTRATIVE CONTROLS

6.8 5.4 Procedures

6.8.1 5.4.1 Written procedures shall be established, implemented, and maintained covering the following activities:

6.8.1.a a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978;

DOC M.1 b. The emergency operating procedures required to implement the requirements of NUREG-0737 and to NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;

6.8.1.f c. Quality assurance for effluent and environmental monitoring;

6.8.1.h d. Fire Protection Program implementation; and

DOC M.2, 6.8.1.d, 6.8.1.g e. All programs specified in Specification 5.5.

(2) (3) (1) (2) (2) (2)

Attachment 1, Volume 16, Rev. 0, Page 61 of 256

JUSTIFICATION FOR DEVIATIONS
ITS 5.4, PROCEDURES

1. The brackets are removed and the proper plant specific information/value is provided.

2. These punctuation corrections have been made consistent with the Writer's Guide for the Improved Standard Technical Specifications, NEI 01-03, Section 5.1.3.

3. Grammatical errors corrected.

Attachment 1, Volume 16, Rev. 0, Page 62 of 256

Specific No Significant Hazards Considerations (NSHCs)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 5.4, PROCEDURES

There are no specific NSHC discussions for this Specification.

Attachment 1, Volume 16, Rev. 0, Page 64 of 256

ATTACHMENT 5

ITS 5.5, Programs and Manuals

Current Technical Specification (CTS) Markup and Discussion of Changes (DOCs)

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

5.5 6.8.4 The following programs shall be established, implemented, and maintained:

5.5.3 a. Radioactive Effluent Controls Program

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

5.5.3.a 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,

5.5.3.b 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR 20.1001-20.2402, Appendix B, Table 2, Column 2,

5.5.3.c 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents pursuant to 10 CFR 20.1302 and with the methodology and parameters in the ODCM,

5.5.3.d 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,

5.5.3.e 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,

5.5.3.f 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,

ITS 5.5

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

5.5.3.g 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY shall be limited to the following:

a) For noble gases: Less than or equal to a dose rate of 500 mrem/year to the total body and less than or equal to a dose rate of 3000 mrem/year to the skin, and

b) For Iodine–131, Iodine–133, tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to a dose rate of 1500 mrem/year to any organ.

5.5.3.h 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,

5.5.3.i 9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50, and

5.5.3.j 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

A.2

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Control Program Surveillance Frequencies.

b. Radiological Environmental Monitoring Program

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

LA.1

1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,

2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and

3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

ITS 5.5

A.1

ITS

JAN 27 2004

(2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 278 are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

(3) Less than Four Loop Operation

The licensee shall not operate the reactor at power levels above P-7 (as defined in Table 3.3-1 of Specification 3.3.1.1 of Appendix A to this license) with less than four reactor coolant loops in operation until (a) safety analyses for less than four loop operation have been submitted, and (b) approval for less than four loop operation at power levels above P-7 has been granted by the Commission by amendment of this license.

(4) Indiana Michigan Power Company shall implement and maintain, in effect, all provisions of the approved Fire Protection Program as described in the Updated Final Safety Analysis Report for the facility and as approved in the SERs dated December 12, 1977, July 31, 1979, January 30, 1981, February 7, 1983, November 22, 1983, December 23, 1983, March 16, 1984, August 27, 1985, June 30, 1986, January 28, 1987, May 26, 1987, June 16, 1988, June 17, 1988, June 7, 1989, February 1, 1990, February 9, 1990, March 26, 1990, April 26, 1990, March 31, 1993, April 8, 1993, December 14, 1994, January 24, 1995, April 19, 1995, June 8, 1995, and March 11, 1996, subject to the following provision:

The licensee 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.

(5) Deleted by Amendment No. 279

(6) Deleted by Amendment No. 80

5.5.8 (7) Secondary Water Chemistry Monitoring Program

The licensee shall implement a secondary water chemistry monitoring program to inhibit steam generator tube degradation. This program shall be described in the station chemistry manual and shall include:

L.6

5.5.8.a 1. Identification of a sampling schedule for the critical parameters and control points for these parameters;

5.5.8.b 2. Identification of the procedures used to measure the values of the critical parameters;

Amendment No. 279

A.1

ITS

5.5.8.c 3. Identification of process sampling points;

5.5.8.d 4. Procedure for the recording and management of data;

5.5.8.e 5. Procedures defining corrective actions for off control point chemistry conditions; and

5.5.8.f 6. A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective actions.

(8) Deleted by Amendment No. 279

(9) Deleted by Amendment No. 279

(10) Deleted by Amendment No. 279

(11) Deleted by Amendment No. 279

D. Physical Protection

The licensee 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: "Donald C. Cook Nuclear Plant Security Plan," with revisions submitted through July 21, 1988; "Donald C. Cook Nuclear Plant Training and Qualification Plan," with revisions submitted through December 19, 1986; and "Donald C. Cook Nuclear Plant Safeguards Contingency Plan," with revisions submitted through June 10, 1988. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

M.1

Add proposed Systems list

E. Deleted by Amendment No. 80

F. Deleted by Amendment No. 80

G. In all places of this license, the reference to the Indiana and Michigan Electric Company is amended to read Indiana Michigan Power Company.

5.5.2 H. System Integrity

The licensee shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low a practical levels. The program shall include the following:

Amendment No. 279

ITS 5.5

A.1

ITS

5.5.2

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and

2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

24 months

L.1

The provisions of SR 3.0.2 are applicable.

I. Iodine Monitoring

The licensee shall implement a program which will ensure the capability to accurately determine the airborne concentration in vital areas under accident conditions. This program shall include the following:

1. Training of Personnel,
2. Procedures for monitoring, and
3. Provisions for maintenance of sampling and analysis equipment.

LA.2

J. The licensee is authorized to use digital signal processing instrumentation in the reactor protection system.

3. This amended license is effective as of the date of issuance and shall expire at midnight October 25, 2014.

FOR THE NUCLEAR REGULATORY COMMISSION

Original signed by
Roger S. Boyd

Roger S. Boyd, Director
Division of Project Management
Office of Nuclear Reactor Regulation

Enclosure:
Appendix A – Technical Specifications

Date of Issuance: March 30, 1976

A.1

ITS

DEFINITIONS

PROCESS CONTROL PROGRAM (PCP)

1.28 The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, state regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

See CTS 6.0

1.29 Deleted.

5.5.1

OFFSITE DOSE CALCULATION MANUAL (ODCM)

5.5.1.a

1.30 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the Environmental Radiological Monitoring Program. The ODCM

5.5.1.b

shall contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.9.1.6 and 6.9.1.7.

GASEOUS RADWASTE TREATMENT SYSTEM

1.31 A GASEOUS RADWASTE TREATMENT SYSTEM is any system designed and installed to reduce radioactive gaseous effluents by collecting primary coolant system off-gases from the primary system and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

See ITS Chapter 1.0

VENTILATION EXHAUST TREATMENT SYSTEM

1.32 A VENTILATION EXHAUST TREATMENT SYSTEM is any system designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal absorbers and/or HEPA filters for the purpose of removing iodines or particulates from the gaseous exhaust stream prior to the release to the environment. Such a system is not considered to have any effect on noble gas effluents. Engineered Safety Feature (ESF) atmospheric cleanup systems are not considered to be VENTILATION EXHAUST TREATMENT SYSTEM components.

PURGE-PURGING

1.33 PURGE or PURGING is the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

VENTING

1.34 VENTING is the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such manner that replacement air or gas is not provided or required during VENTING. Vent, used in system names, does not imply a VENTING process.

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.0 APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

See ITS Section 3.0

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

4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification.

If it is discovered that a surveillance was not performed within its specified surveillance interval, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is less. This delay period is permitted to allow performance of the surveillance.

If the surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be met.

When the surveillance is performed within the delay period and the surveillance criteria are not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be met.

Surveillance requirements do not have to be performed on inoperable equipment.

4.04 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.

5.5.6 4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components shall be applicable as follows:

LA.3

pumps and valves

a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a.

LA.4

Attachment 1, Volume 16, Rev. 0, Page 73 of 256

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.0 APPLICABILITY

SURVEILLANCE REQUIREMENTS

A.15

5.5.6.a

b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

LA.3

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing criteria	Required frequencies for performing inservice inspection and testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

A.15

A.3

5.5.6.b

c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities.

LA.3

d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.

A.4

5.5.6.d

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

A.15

A.5

Add proposed ITS 5.5.6.c

4.0.6 **Deleted**

4.0.7 **Deleted**

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.4 REACTOR COOLANT SYSTEM

STEAM GENERATORS

LIMITING CONDITION FOR OPERATION

3.4.5 Each steam generator shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.*

See ITS 3.4.13

ACTION:

With one or more steam generators inoperable, restore the inoperable generator(s) to OPERABLE status prior to increasing T_{avg} above 200°F.

SURVEILLANCE REQUIREMENTS

4.4.5.0 Each steam generator shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirement of Specification 4.0.5.

5.5.7

4.4.5.1 Steam Generator Sample Selection and Inspection - Each steam generator shall be determined OPERABLE during shutdown by selecting and inspecting at least the minimum number of steam generators specified in Table 4.4-1.

Add proposed ITS 5.5.7 generic program description

A.6

5.5.7

4.4.5.2 Steam Generator Tube Sample Selection and Inspection - The steam generator tube minimum sample size, inspection result classification, and the corresponding action required shall be as specified in Table 4.4-2. The inservice inspection of steam generator tubes shall be performed at the frequencies specified in Specification 4.4.5.3 and the inspected tubes shall be verified acceptable per the acceptance criteria of Specification 4.4.5.4. The tubes selected for each inservice inspection shall include at least 3% of the total number of tubes in all steam generators; the tubes selected for these inspections shall be selected on a random basis except:

5.5.7.a

5.5.7.a.1

a. Where experience in similar plants with similar water chemistry indicates critical areas to be inspected, then at least 50% of the tubes inspected shall be from these critical areas.

5.5.7.a.2

b. The first sample of tubes selected for each inservice inspection (subsequent to the preservice inspection) of each steam generator shall include:

5.5.7.a.2.a)

1. All tubes that previously had detectable wall penetrations (greater than or equal to 20%) that have not been plugged.

* This Specification does not apply in Mode 4 while performing crevice flushing as long as Limiting Conditions for Operation for Specification 3.4.1.3 are maintained.

See ITS 3.4.13

Attachment 1, Volume 16, Rev. 0, Page 75 of 256

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.4 REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS (continued)

5.5.7.a.2.b) 2. Tubes in those areas where experience has indicated potential problems.

5.5.7.a.2.c) 3. A tube inspection (pursuant to Specification 4.4.5.4.a.8) shall be performed on each selected tube. If any selected tube does not permit the passage of the eddy current probe for a tube inspection, this shall be recorded and an adjacent tube shall be selected and subjected to a tube inspection.

5.5.7.a.3 c. The tubes selected as the second and third samples (if required by Table 4.4-2) during each inservice inspection may be subjected to a partial tube inspection provided:

5.5.7.a.3.a) 1. The tubes selected for the samples include the tubes from those areas of the tube sheet array where tubes with imperfections were previously found.

5.5.7.a.3.b) 2. The inspections include those portions of the tubes where imperfections were previously found.

5.5.7.b The results of each sample inspection shall be classified into one of the following three categories:

Category	Inspection Results
C-1	Less than 5% of the total tubes inspected are degraded tubes and none of the inspected tubes are defective.
C-2	One or more tubes, but not more than 1% of the total tubes inspected are defective, or between 5% and 10% of the total tubes inspected are degraded tubes.
C-3	More than 10% of the total tubes inspected are degraded tubes or more than 1% of the inspected tubes are defective.

Attachment 1, Volume 16, Rev. 0, Page 76 of 256

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.4 REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS (continued)

5.5.7.b

Note: In all inspections, previously degraded tubes must exhibit significant (greater than or equal to 10%) further wall penetrations to be included in the above percentage calculations.

5.5.7.c

4.4.5.3 Inspection Frequencies - The above required inservice inspections of steam generator tubes shall be performed at the following frequencies:

5.5.7.c.1

a. The first inservice inspection shall be performed after 6 Effective Full Power Months but within 24 calendar months of initial criticality or replacement of steam generators. Subsequent inservice inspections shall be performed at intervals of not less than 12 nor more than 24 calendar months after the previous inspection. If two consecutive inspections following service under AVT conditions, not including the preservice inspection, result in all inspection results falling into the C-1 category or if two consecutive inspections demonstrate that previously observed degradation has not continued and no additional degradation has occurred, the inspection interval may be extended to a maximum of once per 40 months.

5.5.7.c.2

b. If the results of inservice inspection of a steam generator conducted in accordance with Table 4.4-2 at 40 month intervals fall in Category C-3, the inspection frequency shall be increased to at least once per 20 months. The increase in inspection frequency shall apply until the subsequent inspections satisfy the criteria of Specification 4.4.5.3.a; the interval may then be extended to a maximum of once per 40 months.

5.5.7.c.3

c. Additional, unscheduled inservice inspections shall be performed on each steam generator in accordance with the first sample inspection specified in Table 4.4-2 during the shutdown subsequent to any of the following conditions:

5.5.7.c.3.a)

1. Primary-to-secondary tubes leaks (not including leaks originating from tube-to-tube sheet welds) in excess of the limits of Specification 3.4.6.2.

5.5.7.c.3.b)

2. A seismic occurrence greater than the Operating Basis Earthquake.

5.5.7 c.3.c)

3. A loss-of-coolant accident requiring actuation of the engineered safeguards.

5.5.7.c.3.d)

4. A main steam line or feedwater line break.

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.4 REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS (continued)

5.5.7.d 4.4.5.4 Acceptance Criteria

5.5.7.d.1 a. As used in this Specification:

5.5.7.d.1.a) 1. Imperfection means an exception to the dimensions, finish or contour of a tube from that required by fabrication drawings or specifications. Eddy-current testing indications below 20% of the nominal tube wall thickness, if detectable, may be considered as imperfections.

5.5.7.d.1.b) 2. Degradation means a service-induced cracking, wastage, wear or general corrosion occurring on either inside or outside of a tube.

5.5.7.d.1.c) 3. Degraded Tube means an imperfection greater than or equal to 20% of the nominal wall thickness caused by degradation.

5.5.7 d.1.d) 4. Percent Degradation means the amount of the tube wall thickness affected or removed by degradation.

5.5.7.d.1.e) 5. Defect means an imperfection of such severity that it exceeds the plugging limit. A tube containing a defect is defective.

5.5.7.d.1.f) 6. Plugging Limit means the imperfection depth at or beyond which the tube shall be removed from service. Any tube which, upon inspection, exhibits tube wall degradation of 40 percent or more of the nominal tube wall thickness shall be plugged prior to returning the steam generator to service.

5.5.7.d.1.g) 7. Unserviceable describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of an Operating Basis Earthquake, a loss-of-coolant accident, or a steam line or feedwater line break as specified in 4.4.5.3.c, above.

5.5.7.d.1.h) 8. Inspection determines the condition of the steam generator tube from the point of entry (hot leg side) completely around the U-bend to the top support of the cold leg.

Add proposed ITS 5.5.7.d.1.i)

A.14

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.4 REACTOR COOLANT SYSTEM

5.5.7.d.2

b. The steam generator shall be determined OPERABLE after completing the corresponding actions (plugging all tubes exceeding the plugging limit and all tubes containing through-wall cracks) required by Table 4.4-2.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the SG Program test Frequencies.

A.6

A.1

ITS

REACTOR COOLANT SYSTEMS

Table 5.5.7-1

TABLE 4.4-1

MINIMUM NUMBER OF STEAM GENERATORS TO BE INSPECTED DURING INSERVICE INSPECTION

Preservice Inspection	Yes
No. of Steam Generators per Unit	Four
First Inservice Inspection	Two
Second & Subsequent Inservice Inspections	One[2]

Table Notation:

Table 5.5.7-1 Footnote (a)

1. The inservice inspection may be limited to one steam generator on a rotating schedule encompassing 3 N% of the tubes (where N is the number of steam generators in the plant) if the results of the first or previous inspections indicate that all steam generators are performing in a like manner. Note that under some circumstances, the operating conditions in one or more steam generators may be found to be more severe than those in other steam generators. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

Table 5.5.7-1 Footnote (a)

2. The third and fourth steam generators not inspected during the first inservice inspection shall be inspected during the second and third inspections, respectively. The fourth and subsequent inspections shall follow the instructions described in 1 above.

ITS 5.5

A.1

ITS

Table 5.5.7-2

TABLE 4.4-2
STEAM GENERATOR TUBE INSPECTION

1ST SAMPLE INSPECTION			2ND SAMPLE INSPECTION		3RD SAMPLE INSPECTION	
Sample Size	Result	Action Required	Result	Action Required	Result	Action Required
A minimum of S Tubes per S.G.	C-1	None	N/A	N/A	N/A	N/A
	C-2	Plug defective tubes and inspect additional 2S tubes in this S.G.	C-1	None	N/A	N/A
			C-2	Plug defective tubes and inspect additional 4S tubes in this S.G.	C-1	None
					C-2	Plug defective tubes
					C-3	Perform action for C-3 result of first sample
			C-3	Perform action for C-3 result of first sample	N/A	N/A
	C-3	Inspect all tubes in this S.G., plug defective tubes, and inspect 2S tubes in each other S.G. Prompt notification to NRC pursuant to specification 6.9.1	All other S.G.s are C-1	None	N/A	N/A
			Some S.G.s C-2 but no additional S.G.s are C-3	Perform action for C-2 result of second sample	N/A	N/A
			Additional S.G. is C-3	Inspect all tubes in each S.G. and plug defective tubes. Prompt notification to NRC pursuant to specification 6.9.1	N/A	N/A

S=3(N/n)% N is the number of steam generators in the unit, and n is the number of steam generators inspected during an inspection.

Attachment 1, Volume 16, Rev. 0, Page 81 of 256

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.4 REACTOR COOLANT SYSTEM

3/4.4.10 STRUCTURAL INTEGRITY

ASME CODE CLASS 1, 2 and 3 COMPONENTS

LIMITING CONDITION FOR OPERATION

3.4.10.1 The structural integrity of the ASME Code Class 1, 2 and 3 components shall be maintained in accordance with Specification 4.4.10.1.

APPLICABILITY: ALL MODES

ACTION:

a. With the structural integrity of any ASME Code Class 1 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) prior to increasing the Reactor Coolant System temperature more than 50°F above the minimum temperature required by NDT considerations.

b. With the structural integrity of any ASME Code Class 2 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) prior to increasing the Reactor Coolant System temperature above 200°F.

c. With the structural integrity of any ASME Code Class 3 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) from service.

d. *The provisions of Specification 3.0.4 are not applicable.*

See CTS 3/4.4.10.1

SURVEILLANCE REQUIREMENTS

5.5.5

4.4.10.1 In addition to the requirements of Specification 4.0.5, each reactor coolant pump flywheel shall be inspected by either qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination (magnetic particle testing and/or penetrant testing) of exposed surfaces defined by the volume of the disassembled flywheels once every 10 years.

Add proposed ITS 5.5.5 generic program statement

A.13

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Reactor Coolant Pump Flywheel Inspection Program Surveillance Frequency.

COOK NUCLEAR PLANT-UNIT 1 Page 3/4 4-33 AMENDMENT 98, 217

Attachment 1, Volume 16, Rev. 0, Page 82 of 256

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.6 CONTAINMENT SYSTEMS

See ITS 3.6.1

CONTAINMENT LEAKAGE

LIMITING CONDITION FOR OPERATION

Add proposed ITS 5.5.14 and 5.5.14.a

3.6.1.2 Containment leakage rates shall be limited to:

5.5.14.b, 5.5.14.c, 5.5.14.d.1

a. An overall integrated leakage rate of $\leq L_a$, 0.25 percent by weight of the containment air per 24 hours at P_a, 12.0 psig, and

A.7

5.5.14.d.1

b. A combined leakage rate of $\leq 0.60\ L_a$ for all penetrations and valves subject to Types B and C tests when pressurized to P_a.

L.2

APPLICABILITY: MODES 1, 2, 3 and 4.

See ITS 3.6.1

ACTION:

5.5.14.d.1

With either (a) the measured overall integrated containment leakage rate exceeding $0.75\ L_a$, or (b) with the measured combined leakage rate for all penetrations and valves subject to Types B and C tests exceeding $0.60\ L_a$, restore the overall integrated leakage rate to $\leq 0.75\ L_a$ and the combined leakage rate for all penetrations and valves subject to Types B and C tests to $\leq 0.60\ L_a$ prior to increasing the Reactor Coolant System temperature above 200°F.

L.2

SURVEILLANCE REQUIREMENTS

5.5.14.a 4.6.1.2 Perform leakage rate testing in accordance with 10 CFR 50 Appendix J Option B, except as modified by NRC-approved exemptions, and Regulatory Guide 1.163, dated September 1995. See Notes 1 and 2.

a. Each containment air lock shall be verified to be in compliance with the requirements of Specification 3.6.1.3.

See ITS 3.6.1

b. ~~The provisions of Specification 4.0.2 are not applicable.~~

A.7

Add proposed ITS 5.5.14.e

A.7

Notes:

5.5.14.a.2 1 A one-time exception to the requirement to perform post-modification Type A testing is allowed for the steam generators and associated piping, as components of the containment barrier. For this case, ASME Section XI leak testing will be used to verify the leak tightness of the repaired or modified portions of the containment barrier. Entry into MODES 3 and 4 following the extended outage that commenced in 1997 may be made to perform this testing.

5.5.14.a.1 2 The Type A testing frequency specified in NEI 94-01, Revision 0, Paragraph 9.2.3, as "...at least once per 10 years based on acceptable performance history" is modified to be "...at least once per 15 years based on acceptable performance history." This change applies only to the interval following the Type A test performed in October 1992.

Attachment 1, Volume 16, Rev. 0, Page 83 of 256

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.6 CONTAINMENT SYSTEMS

CONTAINMENT AIR LOCKS

See ITS 3.6.2

LIMITING CONDITION FOR OPERATION

3.6.1.3 Each containment air lock shall be OPERABLE with:

a. Both doors closed except when the air lock is being used for normal transit entry and exit through the containment, then at least one air lock door shall be closed, and

5.5.14.d.2.a), 5.5.14.b

b. An overall air lock leakage rate of $\leq 0.05\ L_a$ at P_a, 12 psig.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

See ITS 3.6.2

With an air lock inoperable, restore the air lock 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.

SURVEILLANCE REQUIREMENTS

4.6.1.3 Each containment air lock shall be demonstrated OPERABLE:

5.5.14.a

a. In accordance with 10 CFR 50 Appendix J Option B and Regulatory Guide 1.163, dated September 1995, and

b. At least once per 6 months by verifying that only one door in each air lock can be opened at a time.

See ITS 3.6.2

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.7 PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

Add proposed ITS 5.5.9 generic program statement

A.9

4.7.5.1 The control room emergency ventilation system shall be demonstrated OPERABLE:

a. Deleted

See ITS 3.7.10

b. At least once per 31 days on a STAGGERED TEST BASIS by initiating flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for at least 15 minutes.

L.3

A.8

24

5.5.9 c. At least once per ~~18~~ months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system, by:

while it is in operation that could adversely affect the filter bank or charcoal adsorber capability

5.5.9.b 1. Verifying that the charcoal adsorbers remove ≥ 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 6000 cfm ± 10%.

5.5.9.a 2. Verifying that the HEPA filter banks remove ≥ 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 6000 cfm ± 10%.

LA.5

5.5.9.c 3. Verifying ~~within 31 days after removal~~ that a laboratory analysis of a carbon sample from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers shows a penetration of less than or equal to 1.0% radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989, 30°C, 95% R.H. The carbon samples not obtained from test canisters shall be prepared by either:

5.5.9.c.1 a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

5.5.9.c.2 b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

5.5.9.a, 5.5.9.b 4. Verifying a system flow rate of 6000 cfm ± 10% during system operation when tested in accordance with ANSI N510-1975.

Attachment 1, Volume 16, Rev. 0, Page 85 of 256

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.7 PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

5.5.9 d. After every 720 hours of charcoal adsorber operation by either:

LA.5

5.5.9.c 1. Verifying within 31 days after removal that a laboratory analysis of a carbon sample obtained from a test canister shows a penetration of less than or equal to 1.0% for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989, 30°C, 95% R.H; or

LA.5

5.5.9.c 2. Verifying within 31 days after removal that a laboratory analysis of at least two carbon samples shows a penetration of less than or equal to 1.0% for radioactive methyl iodide when the samples are tested in accordance with ASTM D3803-1989, 30°C, 95% R.H; and the samples are prepared by either:

5.5.9.c.1 a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

5.5.9.c.2 b) Emptying a *longitudinal sample from* an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also:

a) Verifying that the charcoal adsorbers remove ≥ 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 6000 cfm ± 10%, and

L.4

b) Verifying that the HEPA filter banks remove ≥ 99% of the DOP when *they are tested in-place in accordance with ANSI N510-1975 while* operating the ventilation system at a flow rate of 6000 cfm ± 10%.

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.7 PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

L.3

24

5.5.9 e. At least once per ~~18~~ months by:

5.5.9.d 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches Water Gauge while operating the ventilation system at a flow rate of 6000 cfm plus or minus 10%.

2. a. Verifying that on a Safety Injection Signal from Unit 1, the system automatically operates in the pressurization/cleanup mode.

b. Verifying that on a Safety Injection Signal from Unit 2, the system automatically operates in the pressurization/cleanup mode.

See ITS 3.3.7 and ITS 3.7.10

3. Verifying that the system maintains the control room envelope/pressure boundary at a positive pressure of greater than or equal to 1/16 inch W. G. relative to the outside atmosphere at a system flow rate of 6000 cfm plus or minus 10%, with a makeup air flow rate of $\leq$ 1000 cfm.

See ITS 3.7.10

5.5.9 f. After each complete or partial replacement of a HEPA filter bank by verifying that the

5.5.9.a HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 6000 cfm plus or minus 10%.

5.5.9 g. After each complete or partial replacement of a charcoal adsorber bank by verifying that

5.5.9.b the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 6000 cfm plus or minus 10%.

A.9

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test Frequencies.

Attachment 1, Volume 16, Rev. 0, Page 87 of 256

A.1

ITS

PLANT SYSTEMS

3/4.7.6 ESF VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.6.1 Two independent ESF ventilation system exhaust air filter trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one ESF ventilation system exhaust air filter train inoperable, restore the inoperable train to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

See ITS 3.7.12

SURVEILLANCE REQUIREMENTS

Add proposed ITS 5.5.9 generic program statement

A.9

4.7.6.1 Each ESF ventilation system exhaust air filter train shall be demonstrated OPERABLE:

a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for at least 15 minutes.

See ITS 3.7.12

L.3

A.8

24 months

5.5.9

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system, by:

while it is in operation that could adversely affect the filter bank or charcoal adsorber capability

1. Deleted.

5.5.9.b

2. Verifying that the charcoal adsorbers remove ≥ 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 25,000 cfm ± 10%.

5.5.9.a

3. Verifying that the HEPA filter banks remove ≥ 99% of the DOP when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 25,000 cfm ± 10%.

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.7 PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

LA.5

5.5.9.c

4. Verifying ~~within 31 days after removal~~ that a laboratory analysis of a carbon sample from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers shows a penetration of less than or equal to 5% for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989, 30°C, 95% R.H., and ≥ 45.5 fpm face velocity. The carbon samples not obtained from test canisters shall be prepared by either:

5.5.9.c.1

a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

5.5.9.c.2

b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

~~Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 25,000 cfm plus or minus 10%.~~

L.4

5.5.9.a, 5.5.9.b

5. Verifying a system flow rate of 25,000 cfm plus or minus 10% during system operation when tested in accordance with ANSI N510-1980.

5.5.9

c. After every 720 hours of charcoal adsorber operation by either:

5.5.9.c

1. Verifying ~~within 31 days after removal~~ that a laboratory analysis of a carbon sample obtained from a test canister shows a penetration of less than or equal to 5% for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989, 30°C, 95% R.H., and ≥ 45.5 fpm face velocity; or

LA.5

5.5.9.c

2. Verifying ~~within 31 days after removal~~ that laboratory analyses of at least two carbon samples shows a penetration of less than or equal to 5% for radioactive methyl iodide when the samples are tested in accordance with ASTM D3803-1989, 30°C, 95% R.H., and ≥ 45.5 fpm face velocity and the samples are prepared by either:

LA.5

5.5.9.c.1

a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

A.1

ITS

PLANT SYSTEM
SURVEILLANCE REQUIREMENTS (Continued)

5.5.9.c.2

b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 25,000 cfm plus or minus 10%:

L.4

L.3

24

5.5.9 d. At least once per 18 months by:

5.5.9.d

1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches Water Gauge while operating the ventilation system at a flow rate of 25,000 cfm plus or minus 10%.

2. Deleted.

3. Verifying that the standby fan starts automatically on a Containment Pressure--High-High Signal and directs its exhaust flow through the HEPA filters and charcoal adsorber banks on a Containment Pressure--High-High Signal.

See ITS 3.7.12

5.5.9 e. After each complete or partial replacement of HEPA filter band by

5.5.9.a verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 25,000 cfm plus or minus 10%.

5.5.9 f. After each complete or partial replacement of a charcoal adsorber bank

5.5.9.b by verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 25,000 cfm plus or minus 10%.

A.9

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test Frequencies.

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.8 ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE:

a. In accordance with the frequency specified in Table 4.8-1 on a STAGGERED TEST BASIS by:

1. Verifying the fuel level in the day tank,

2. Verifying the fuel level in the fuel storage tank,

3. Verifying that the fuel transfer pump can be started and that it transfers fuel from the storage system to the day tank,

4. Verifying that the diesel starts from standby conditions and achieves in less than or equal to 10 seconds, voltage = 4160±420 V, and frequency = 60±1.2 Hz,*

5. Verifying the diesel is synchronized and loaded and operates for greater than or equal to 60 minutes at a load of 3500 kw**, and

6. Verifying that the diesel generator is aligned to provide standby power to the associated emergency busses.

b. By removing accumulated water***

1) From the day tank at least once per 31 days and after each occasion when the diesel is operated for greater than 1 hour, and

2) From the storage tanks at least once per 31 days.

5.5.11.a c. By sampling new fuel oil*** in accordance with the applicable guidelines of ASTM D4057-81 prior to adding new fuel to the storage tanks and

5.5.11.a 1) By verifying, in accordance with the tests specified in ASTM D975-81 and prior to adding the new fuel to the storage tanks, that the sample has:

Add proposed ITS 5.5.11 generic program statement

See ITS 3.8.1 and ITS 3.8.3

See ITS 3.8.1

See ITS 3.8.3

See ITS 3.8.1

See ITS 3.8.1 and ITS 3.8.3

See ITS 3.8.1

See ITS 3.8.3

LA.6

A.10

* The diesel generator start (10 seconds) from standby conditions shall be performed at least once per 184 days in these surveillance tests. All other engine starts for the purpose of this surveillance testing and compensatory action may be at reduced acceleration rates as recommended by the manufacturer so that mechanical stress and wear on the diesel engine are minimized.

** Momentary load transients do not invalidate this test.

*** The actions to be taken should any of the properties be found outside of specified limits are defined in the Bases.

See ITS 3.8.1

See ITS 3.8.3

Attachment 1, Volume 16, Rev. 0, Page 91 of 256

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.8 ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

5.5.11.a.2 a) A kinematic viscosity of greater than or equal to 1.9 centistokes but less than or equal to 4.1 centistokes at 40°C (alternatively, Saybolt viscosity, SUS at 100°F of greater than or equal to 32.6 but less than or equal to 40.1), if gravity was not determined by comparison with supplier's certification.

5.5.11.a.2 b) A flash point equal to or greater than 125°F.

5.5.11.a.1 2) By verifying, in accordance with the test specified in ASTM D1298-80 and prior to adding the new fuel to the storage tanks, that the sample has either an API gravity of greater than or equal to 30 degrees but less than or equal to 40 degrees at 60°F or an absolute specific gravity at 60/60°F of greater than or equal to 0.82 but less than or equal to 0.88, or an API gravity of within 0.3 degrees at 60°F when compared to the supplier's certificate or a specific gravity of within 0.0016 at 60/60° when compared to the supplier's certificate.

5.5.11.a.3 3) By verifying, in accordance with the test specified in ASTM D4176-82 and prior to adding new fuel to the storage tanks, that the sample has a clear and bright appearance with proper color.

5.5.11.b 4) By verifying within 31 days of obtaining the sample that the other properties specified in Table 1 of ASTM D975-81 are within the appropriate limits when tested in accordance with ASTM D975-81 except that the analysis for sulfur may be performed in accordance with ASTM D2622-82.

5.5.11.c d. At least once per 31 days by obtaining a sample of fuel oil from the storage tanks in accordance with ASTM D2276-83, and verifying that total particulate contamination is less than 10 mg/liter when tested in accordance with ASTM D2276-83, Method A*.

e. At least once per 18 months, during shutdown, by:

1. Subjecting the diesel engine to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service,

*The actions to be taken should any of the properties be found outside of the specified limits are defined in the Bases.

COOK NUCLEAR PLANT-UNIT 1 Page 3/4 8-4 AMENDMENT 125

within limits

LA.6

within limits

within limits

LA.6

of new fuel oil, other than those addressed in Specification 5.5.11.a above,

L.5

LA.6

See ITS 3.8.3

See ITS 3.8.1

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program test Frequencies.

A.10

See ITS 3.8.3

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.9 REFUELING OPERATIONS

STORAGE POOL VENTILATION SYSTEM**

LIMITING CONDITION FOR OPERATION

3.9.12 The spent fuel storage pool exhaust ventilation system shall be OPERABLE.

See ITS 3.7.13

APPLICABILITY: Whenever irradiated fuel is in the storage pool.

ACTION:

a. With no fuel storage pool exhaust ventilation system OPERABLE, suspend all operations involving movement of fuel within the storage pool or crane operation with loads over the storage pool until at least one spent fuel storage pool exhaust ventilation system is restored to OPERABLE status.*

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

Add proposed ITS 5.5.9 generic program statement

A.9

4.9.12 The above required fuel storage pool ventilation system shall be demonstrated OPERABLE:

See ITS 3.7.13

a. At least once per 31 days by initiating flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for at least 15 minutes.

L.3

24

5.5.9

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system, by:

while it is in operation that could adversely affect the filter bank or charcoal adsorber capability

A.8

1. Deleted

5.5.9.b

2. Verifying that the charcoal adsorbers remove ≥ 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the exhaust ventilation system at a flow rate of 30,000 cfm ± 10%.

* The crane bay roll-up door and the south door of the auxiliary building crane bay may be opened under administrative control during movement of fuel within the storage pool or crane operation with loads over the storage pool.

See ITS 3.7.13

** Shared system with D.C. COOK - UNIT 2.

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.9 REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

5.5.9.a

3. Verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1980 while operating the exhaust ventilation system at a flow rate of 30,000 cfm plus or minus 10%.

LA.5

5.5.9.c

4. Verifying ~~within 31 days after removal~~ that a laboratory analysis of a carbon sample from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers shows a penetration of less than or equal to 5% for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989, 30°C, 95% R.H., and ≥ 46.8 fpm face velocity. The carbon samples not obtained from test canisters shall be prepared by either:

5.5.9.c.1

(a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

5.5.9.c.2

(b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

~~Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 30,000 cfm plus or minus 10%.~~

L.4

5.5.9.a, 5.5.9.b

5. Verifying a system flow rate of 30,000 cfm plus or minus 10% during system operation when tested in accordance with ANSI N510-1980.

5.5.9

c. After every 720 hours of charcoal adsorber operation by either:

LA.5

5.5.9.c

1. Verifying ~~within 31 days after removal~~ that a laboratory analysis of a carbon sample obtained from a test canister shows a penetration of less than or equal to 5% for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989, 30°C, 95% R.H., and ≥ 46.8 fpm face velocity; or

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.9 REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

LA.5

5.5.9.c 2. Verifying ~~within 31 days after removal~~ that laboratory analysis of at least two carbon samples shows a penetration of less than or equal to 5% for radioactive methyl iodide when the samples are tested in accordance with ASTM D3803-1989, 30°C, 95% R.H., and ≥ 46.8 fpm face velocity and the samples are prepared by either:

5.5.9.c.1 (a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

5.5.9.c.2 (b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 30,000 cfm plus or minus 10%.

L.4

24

L.3

5.5.9 d. At least once per ~~18~~ months by:

5.5.9.d 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than or equal to 6 inches Water Gauge while operating the exhaust ventilation system at a flow rate of 30,000 cfm plus or minus 10%.

2. Deleted.

3. Verifying that on a high-radiation signal, the system automatically directs its exhaust flow through the charcoal adsorber banks and automatically shuts down the storage pool ventilation system supply fans.

4. Verifying that the exhaust ventilation system maintains the spent fuel storage pool area at a negative pressure of greater than or equal to 1/8 inches Water Gauge relative to the outside atmosphere during system operation.

See ITS 3.7.13

A.1

ITS

REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

5.5.9
5.5.9.a

e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove ≥ 99% of the DOP when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 30,000 cfm ± 10%.

5.5.9
5.5.9.b

f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove ≥ 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 30,000 cfm ± 10%.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test Frequencies.

A.9

A.1

ITS

3/4.11 RADIOACTIVE EFFLUENTS

LIQUID HOLDUP TANKS*

LIMITING CONDITION FOR OPERATION

Add proposed ITS 5.5.10 generic program statement — A.11

5.5.10, 5.5.10.c

3.11.1 The quantity of radioactive material contained in each of the following tanks shall be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases. — LA.7

a. Outside temporary tanks.

APPLICABILITY: At all times.

ACTION:

a. With the quantity of radioactive material in any of the above listed tanks exceeding the above limit, without delay suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents to within the limit. — LA.7

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

5.5.10.c

4.11.1 The quantity of radioactive material contained in each of the above listed tanks shall be determined to be within the above limit by analyzing a representative sample of the tank's contents at least once per 7 days when radioactive materials are being added to the tank. — LA.7

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Storage Tank Radioactivity Monitoring Program Surveillance Frequencies. — A.11

5.5.10.c

* Tanks included in this Specification are those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents and that do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

COOK NUCLEAR PLANT - UNIT 1 3/4 11-1 AMENDMENT NO. ~~69~~, ~~154~~, 189

A.1

ITS

RADIOACTIVE EFFLUENTS

3/4.11.2 GASEOUS EFFLUENTS

EXPLOSIVE GAS MIXTURE

LIMITING CONDITION FOR OPERATION

Add proposed ITS 5.5.10 generic program statement

A.11

5.5.10, 5.5.10.a

3.11.2.1 The concentration of oxygen in the waste gas holdup system shall be limited to less than or equal to 3% by volume if the hydrogen in the system is greater than or equal to 4% by volume.

LA.7

APPLICABILITY: At all times.

ACTION:

a. With the concentration of oxygen in the waste gas holdup system greater than 3% by volume but less than or equal to 4% by volume and containing greater than or equal to 4% hydrogen, restore the concentration of oxygen to less than or equal to 3% or reduce the hydrogen concentration to less than 4% within 96 hours.

b. With the concentration of oxygen in the waste gas holdup system or tank greater than 4% by volume and greater than 4% hydrogen by volume without delay suspend all additions of waste gases to the system or tank and reduce the concentration of oxygen to less than or equal to 3% or the concentration of hydrogen to less than or equal to 4% within 96 hours in the system or tank.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

LA.7

SURVEILLANCE REQUIREMENTS

5.5.10.a

4.11.2.1 The concentration of oxygen in the waste gas holdup system shall be determined to within the above limits by continuously monitoring the waste gases in the waste gas holdup system with the oxygen monitors required OPERABLE by Table 3.3-12 of Specification 3.3.3.9.

LA.7

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas Radioactivity Monitoring Program Surveillance Frequencies.

A.11

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.11 RADIOACTIVE EFFLUENTS

GAS STORAGE TANKS

LIMITING CONDITION FOR OPERATION

Add proposed ITS 5.5.10 generic program statement

A.11

5.5.10, 5.5.10.b

3.11.2.2 The quantity of radioactivity contained in each gas storage tank shall be limited to 43,800 curies noble gas (considered as Xe-133).

LA.7

APPLICABILITY: At all times.

ACTION:

a. With the quantity of radioactive material in any gas storage tank exceeding the above limit, without delay suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents to within the limit.

LA.7

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

5.5.10.b

4.11.2.2 The quantity of radioactive material contained in each gas storage tank shall be determined to be within the above limit at least once per 7 days whenever radioactive materials are added to the tank and at least once per 24 hours during primary coolant system degassing operations.

LA.7

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Storage Tank Radioactivity Monitoring Program Surveillance Frequencies.

A.11

ITS 5.5

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.

b. Deleted.

c. Deleted.

d. PROCESS CONTROL PROGRAM implementation.

e. OFFSITE DOSE CALCULATION MANUAL implementation.

f. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974, and Regulatory Guide 4.1, Rev. 1, April 1975.

See ITS 5.4

5.5.4

g. Component Cyclic or Transient Limits program, which provides controls to track the UFSAR, Section 4.1, cyclic and transient occurrences to ensure that components are maintained within the limits.

A.12

h. Fire Protection Program implementation.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes, shall be reviewed prior to implementation as set forth in Quality Assurance Program Description, Appendix C, Section 6.5.

See ITS 5.4

6.8.3 Deleted.

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

a. Shall be documented and records of reviews performed shall be retained as required by the Quality Assurance Program Description, Appendix C, Section 6.10.2.n. This documentation shall contain:

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

2. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

See CTS 6.0

b. Shall become effective after review and acceptance by the PORC and the approval of the Plant Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

5.5.1.c 6.14.1 Changes to the ODCM:

5.5.1.c.1 a. Shall be documented and records of reviews performed shall be retained ~~as required by the Quality Assurance Program Description, Appendix C, Section 6.10.2.n.~~ This documentation shall contain:

LA.8

5.5.1.c.1.a) 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

5.5.1.c.1.b) 2. A determination that the change will maintain the level of radioactive effluent control pursuant to 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

LA.8

5.5.1.c.2 b. Shall become effective after ~~review and acceptance by the PORC~~ and the approval of the Plant Manager.

LA.9

5.5.1.c.3 c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

Add proposed ITS 5.5.12, ITS 5.5.13, and ITS 5.5.15

M.2

ITS

A.1

6.0 ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

5.5 6.8.4 The following programs shall be established, implemented, and maintained:

5.5.3 a. Radioactive Effluent Controls Program

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

5.5.3.a 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,

5.5.3.b 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR 20.1001-20.2402, Appendix B, Table 2, Column 2,

5.5.3.c 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents pursuant to 10 CFR 20.1302 and with the methodology and parameters in the ODCM,

5.5.3.d 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,

5.5.3.e 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,

5.5.3.f 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,

ITS

A.1

6.0 ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

5.5.3.g

7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY shall be limited to the following:

a) For noble gases: Less than or equal to a dose rate of 500 mrem/year to the total body and less than or equal to a dose rate of 3000 mrem/year to the skin, and

b) For Iodine-131, Iodine-133, tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to a dose rate of 1500 mrem/year to any organ.

5.5.3.h

8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,

5.5.3.i

9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50, and

A.2

5.5.3.j

10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR Part 190.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Control Program Surveillance Frequencies.

b. Radiological Environmental Monitoring Program

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

LA.1

1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,

2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and

3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

Attachment 1, Volume 16, Rev. 0, Page 103 of 256

ITS

A.1

(s) Deleted by Amendment No. 261

(t) Deleted by Amendment 63

(u) Deleted by Amendment No. 261

5.5.8 (v) Secondary Water Chemistry Monitoring Program

The licensee shall implement a secondary water chemistry monitoring program to inhibit steam generator tube degradation. This program shall be described in the station chemistry manual and shall include:

L.6

5.5.8.a 1. Identification of a sampling schedule for the critical parameters and control points for these parameters;

5.5.8.b 2. Identification of the procedures used to measure the values of the critical parameters;

5.5.8.c 3. Identification of process sampling points;

5.5.8.d 4. Procedure for the recording and management of data;

5.5.8.e 5. Procedures defining corrective actions for off control point chemistry conditions; and

5.5.8.f 6. A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective actions.

(w) Deleted by Amendment No. 261

(x) Deleted by Amendment No. 261

(y) Deleted by Amendment No. 261

(z) The 72-hour allowed outage time of Technical Specification 3.8.1.1 Action "b" which was entered at 0923, on December 7, 2003, may be extended one time by an additional 72 hours to complete repair and testing of the 2 AB diesel generator.

D. Physical Protection

The licensee 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: "Donald C. Cook Nuclear Plant Security Plan," with revisions submitted

ITS

A.1

through July 21, 1988; "Donald C. Cook Nuclear Plant Training and Qualification Plan," with revisions submitted through December 19, 1986; and "Donald C. Cook Nuclear Plant Safeguards Contingency Plan," with revisions submitted through June 10, 1988. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

E. Deleted by Amendment No. 63

F. In all places of this license, the reference to the Indiana and Michigan Electric Company is amended to read Indiana Michigan Power Company.

5.5.2 G. System Integrity

The licensee shall implement a program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. This program shall include the following:

M.1

Add proposed Systems list

1. Provisions establishing preventive maintenance and periodic visual inspection requirements, and

2. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.

24 months

L.1

The provisions of SR 3.0.2 are applicable.

H. Iodine Monitoring

The licensee shall implement a program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

1. Training of personnel,

2. Procedures for monitoring, and

3. Provisions for maintenance of sampling and analysis equipment.

LA.2

I. Deleted by Amendment No. 261

(1) Deleted by Amendment No. 261

(2) Deleted by Amendment No. 261

J. The licensee is authorized to use digital signal processing instrumentation in the reactor protection system.

Amendment No. 261

ITS

A.1

DEFINITIONS

1.29 Deleted.

5.5.1 OFFSITE DOSE CALCULATION MANUAL (ODCM)

5.5.1.a 1.30 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the Environmental Radiological Monitoring Program.

5.5.1.b The ODCM shall contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.9.1.6 and 6.9.1.7.

GASEOUS RADWASTE TREATMENT SYSTEM

1.31 A GASEOUS RADWASTE TREATMENT SYSTEM is any system designed and installed to reduce radioactive gaseous effluents by collecting primary coolant system off-gases from the primary system and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

VENTILATION EXHAUST TREATMENT SYSTEM

1.32 A VENTILATION EXHAUST TREATMENT SYSTEM is any system designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal absorbers and/or HEPA filters for the purpose of removing iodines or particulates from the gaseous exhaust stream prior to the release to the environment. Such a system is not considered to have any effect on noble gas effluents. Engineered Safety Feature (ESF) atmospheric cleanup systems are not considered to be VENTILATION EXHAUST TREATMENT SYSTEM components.

See ITS Chapter 1.0

PURGE-PURGING

1.33 PURGE or PURGING is the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

VENTING

1.34 VENTING is the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is not provided or required during VENTING. Vent, used in system names, does not imply a VENTING process.

ITS 5.5

ITS

A.1

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.0 APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be applicable during the OPERATIONAL MODES or other conditions *specified for individual* Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

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

4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification.

If it is discovered that a surveillance was not performed within its specified surveillance interval, then compliance with the requirement to declare the Limiting Condition for Operation not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is less. This delay period is permitted to allow performance of the surveillance.

If the surveillance is not performed within the delay period, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be met.

When the surveillance is performed within the delay period and the surveillance criteria are not met, the Limiting Condition for Operation must immediately be declared not met, and the applicable ACTION requirements must be met.

Surveillance requirements do not have to be performed on inoperable equipment.

4.0.4 Entry into an OPERATIONAL MODE or other specified applicability condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified.

See ITS Section 3.0

5.5.6 4.0.5 *Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 3 components* shall be applicable as follows:

LA.3

pumps and valves

a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2 and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a.

LA.4

Attachment 1, Volume 16, Rev. 0, Page 107 of 256

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.0 APPLICABILITY

SURVEILLANCE REQUIREMENTS

A.15

5.5.6.a

b. Surveillance Intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

LA.3

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing criteria	Required frequencies for performing inservice inspection and testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

A.15

A.3

5.5.6.b

c. The provisions of Specification 4.0.2 are applicable to the above required frequencies for performing inservice inspection and testing activities.

LA.3

d. Performance of the above inservice inspection and testing activities shall be in addition to other specified Surveillance Requirements.

A.4

5.5.6.d

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

A.15

4.0.6 Deleted

Add proposed ITS 5.5.6.c

A.5

4.0.7 Deleted

Attachment 1, Volume 16, Rev. 0, Page 108 of 256

ITS

A.1

REACTOR COOLANT SYSTEM

STEAM GENERATORS

LIMITING CONDITION FOR OPERATION

3.4.5 Each steam generator shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.*

See ITS 3.4.13

ACTION:

With one or more steam generators inoperable, restore the inoperable generator(s) to OPERABLE status prior to increasing T_{avg} above 200°F.

SURVEILLANCE REQUIREMENTS

4.4.5.0 Each steam generator shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirement of Specification 4.0.5.

5.5.7

4.4.5.1 Steam Generator Sample Selection and Inspection - Each steam generator shall be determined OPERABLE during shutdown by selecting and inspecting at least the minimum number of steam generators specified in Table 4.4-1.

Add proposed ITS 5.5.7 generic program description

A.6

5.5.7

4.4.5.2 Steam Generator Tube Sample Selection and Inspection - The steam generator tube minimum sample size, inspection result classification, and the corresponding action required shall be as specified in Table 4.4-2. The inservice inspection of steam generator tubes shall be performed at the frequencies specified in Specification 4.4.5.3 and the inspected tubes shall be verified acceptable per the acceptance criteria of Specification 4.4.5.4. The tubes selected for each inservice inspection shall include at least 3% of the total number of tubes in all steam generators; the tubes selected for these inspections shall be selected on a random basis except:

5.5.7.a

5.5.7.a.1

a. Where experience in similar plants with similar water chemistry indicates critical areas to be inspected, then at least 50% of the tubes inspected shall be from these critical areas.

5.5.7.a.2

b. The first sample of tubes selected for each inservice inspection (subsequent to the preservice inspection) of each steam generator shall include:

* This Specification does not apply in Mode 4 while performing crevice flushing as long as Limiting Conditions For Operation for Specification 3.4.1.3 are maintained.

See ITS 3.4.13

ITS

A.1

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

5.5.7.a.2.a) 1. All nonplugged tubes that previously had detectable wall penetrations (>20%).

5.5.7.a.2.b) 2. Tubes in those areas where experience has indicated potential problems.

5.5.7.a.2.c) 3. A tube inspection (pursuant to Specification 4.4.5.4.a.8) shall be performed on each selected tube. If any selected tube does not permit the passage of the eddy current probe for a tube inspection, this shall be recorded and an adjacent tube shall be selected and subjected to a tube inspection.

5.5.7.a.3 c. The tubes selected as the second and third samples (if required by Table 4.4-2) during each inservice inspection may be subjected to a partial tube inspection provided:

5.5.7.a.3.a) 1. The tubes selected for these samples include the tubes from those areas of the tube sheet array where tubes with imperfections were previously found.

5.5.7.a.3.b) 2. The inspections include those portions of the tubes where imperfections were previously found.

5.5.7.b The results of each sample inspection shall be classified into one of the following three categories:

Category	Inspection Results
C-1	Less than 5% of the total tubes inspected are degraded tubes and none of the inspected tubes are defective.
C-2	One or more tubes, but not more than 1% of the total tubes inspected are defective, or between 5% and 10% of the total tubes inspected are degraded tubes.
C-3	More than 10% of the total tubes inspected are degraded tubes or more than 1% of the inspected tubes are defective.

Note: In all inspections, previously degraded tubes must exhibit significant (>10%) further wall penetrations to be included in the above percentage calculations.

ITS

A.1

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

5.5.7.c

4.4.5.3 *Inspection Frequencies* - The above required inservice inspections of steam generator tubes shall be performed at the following frequencies:

5.5.7.c.1

a. The first inservice inspection shall be performed after 6 Effective Full Power Months but within 24 calendar months of initial criticality. Subsequent inservice inspections shall be performed at intervals of not less than 12 nor more than 24 calendar months after the previous inspection. If two consecutive inspections following service under AVT conditions, not including the preservice inspection, result in all inspection results falling into the C-1 category or if two consecutive inspections demonstrate that previously observed degradation has not continued and no additional degradation has occurred, the inspection interval may be extended to a maximum of once per 40 months.

5.5.7.c.2

b. If the results of the inservice inspection of a steam generator conducted in accordance with Table 4.4-2 at 40 month intervals fall in Category C-3, the inspection frequency shall be increased to at least once per 20 months. The increase in inspection frequency shall apply until the subsequent inspections satisfy the criteria of Specification 4.4.5.3.a; the interval may then be extended to a maximum of once per 40 months.

5.5.7.c.3

c. Additional, unscheduled inservice inspections shall be performed on each steam generator in accordance with the first sample inspection specified in Table 4.4-2 during the shutdown subsequent to any of the following conditions:

5.5.7.c.3.a)

1. Primary-to-secondary tubes leaks (not including leaks originating from tube-to-tube sheet welds) in excess of the limits of Specification 3.4.6.2.

5.5.7.c.3.b)

2. A seismic occurrence greater than the Operating Basis Earthquake.

5.5.7.c.3.c)

3. A loss-of-coolant accident requiring actuation of the engineered safeguards.

5.5.7.c.3.d)

4. A main steam line or feedwater line break.

ITS

A.1

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

5.5.7.d 4.4.5.4 Acceptance Criteria

5.5.7.d.1 a. As used in this Specification:

5.5.7.d.1.a) 1. Imperfection means an exception to the dimensions, finish or contour of a tube from that required by fabrication drawings or specifications. Eddy-current testing indications below 20% of the nominal tube wall thickness, if detectable, may be considered as imperfections.

5.5.7.d.1.b) 2. Degradation means a service-induced cracking, wastage, wear or general corrosion occurring on either inside or outside of a tube.

5.5.7.d.1.c) 3. Degraded Tube means a tube containing imperfections ≥20% of the nominal wall thickness caused by degradation.

5.5.7 d.1.d) 4. % Degradation means the percentage of the tube wall thickness affected or removed by degradation.

5.5.7.d.1.e) 5. Defect means an imperfection of such severity that it exceeds the plugging limit. A tube containing a defect is defective.

5.5.7.d.1.f) 6. Plugging Limit means the imperfection depth at or beyond which the tube shall be removed from service because it may become unserviceable prior to the next inspection and is equal to 40% of the nominal tube wall thickness.

5.5.7.d.1.g) 7. Unserviceable describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of an Operating Basis Earthquake, a loss-of-coolant accident, or a steam line or feedwater line break as specified in 4.4.5.3.c, above.

5.5.7.d.1.h) 8. Tube Inspection means an inspection of the steam generator tube from the point of entry (hot leg side) completely around the U-bend to the top support of the cold leg.

ITS

A.1

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

5.5.7.d.1.i)

9. Preservice Inspection means an inspection of the full length of each tube in each steam generator performed by eddy current techniques prior to service establish a baseline condition of the tubing. This inspection shall be performed after the field hydrostatic test and prior to initial POWER OPERATION using the equipment and techniques expected to be used during subsequent inservice inspections.

5.5.7.d.2

b. The steam generator shall be determined OPERABLE after completing the corresponding actions (plug all tubes exceeding the plugging limit and all tubes containing through-wall cracks) required by Table 4.4-2.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the SG Program test Frequencies.

A.6

4.4.5.5 Reports

a. Following each inservice inspection of steam generator tubes, the number of tubes plugged in each steam generator shall be reported to the Commission within 15 days.

b. The complete results of the steam generator tube inservice inspection shall be included in the Annual Operating Report for the period in which this inspection was completed. This report shall include:

1. Number and extent of tubes inspected.

2. Location and percent of wall-thickness penetration for each indication of an imperfection.

3. Identification of tubes plugged.

c. Results of steam generator tube inspections which fall into Category C-3 and require prompt notification of the Commission shall be reported pursuant to Specification 6.9.1 prior to resumption of plant operation. The written followup of this report shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence.

See ITS 5.6

D.C. COOK - UNIT 2 3/4 4-11

ITS 5.5

A.1

ITS

Table 5.5.7-1

TABLE 4.4-1

MINIMUM NUMBER OF STEAM GENERATORS TO BE

INSPECTED DURING INSERVICE INSPECTION

Preservice Inspection	Yes
No. of Steam Generators per Unit	Four
First Inservice Inspection	Two
Second & Subsequent Inservice Inspections	One[2]

Table Notation:

Table 5.5.7-1 Footnote (a)

1. The inservice inspection may be limited to one steam generator on a rotating schedule encompassing 3 N % of the tubes (where N is the number of steam generators in the plant) if the results of the first or previous inspections indicate that all steam generators are performing in a like manner. Note that under some circumstances, the operating conditions in one or more steam generators may be found to be more severe than those in other steam generators. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

Table 5.5.7-1 Footnote (a)

ne third and fourth steam generators not inspected during the first inservice inspection hall be inspected during the second and third inspections, respectively. The fourth and bsequent inspections shall follow the instructions described in 1 above.

Attachment 1, Volume 16, Rev. 0, Page 114 of 256

A.1

ITS

Table 5.5.7-2

TABLE 4.4-2
STEAM GENERATOR TUBE INSPECTION

1ST SAMPLE INSPECTION			2ND SAMPLE INSPECTION		3RD SAMPLE INSPECTION	
Sample Size	Result	Action Required	Result	Action Required	Result	Action Required
A minimum of S Tubes per S.G.	C-1	None	N/A	N/A	N/A	N/A
	C-2	Plug defective tubes and inspect additional 2S tubes in this S.G.	C-1	None	N/A	N/A
			C-2	Plug defective tubes and inspect additional 4S tubes in this S.G.	C-1	None
					C-2	Plug defective tubes
					C-3	Perform action for C-3 result of first sample
			C-3	Perform action for C-3 result of first sample	N/A	N/A
	C-3	Inspect all tubes in this S.G., plug defective tubes and inspect 2S tubes in each other S.G. Prompt notification to NRC pursuant to specification 6.9.1	All other S.G.s are C-1	None	N/A	N/A
			Some S.G.s C-2 but no additional S.G. are C-3.	Perform action for C-2 result of second sample	N/A	N/A
			Additional S.G. is C-3	Inspect all tubes in each S.G. and plug defective tubes. Prompt notification to NRC pursuant to specification 6.9.1.	N/A	N/A

S = 3(N/n)% Where N is the number of steam generators in the unit, and n is the number of steam generators inspected during an inspection.

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.4 REACTOR COOLANT SYSTEM

3/4.4.10 STRUCTURAL INTEGRITY

ASME CODE CLASS 1, 2 and 3 COMPONENTS

LIMITING CONDITION FOR OPERATION

3.4.10.1 The structural integrity of ASME Code Class 1, 2 and 3 components shall be maintained in accordance with Specification 4.4.10.1.

APPLICABILITY: ALL MODES

ACTION:

a. With the structural integrity of any ASME Code Class 1 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) prior to increasing the Reactor Coolant System temperature more than 50°F above the minimum temperature required by NDT considerations.

b. With the structural integrity of any ASME Code Class 2 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) prior to increasing the Reactor Coolant System temperature above 200°F.

c. With the structural integrity of any ASME Code Class 3 component(s) not conforming to the above requirements, restore the structural integrity of the affected component(s) to within its limit or isolate the affected component(s) from service.

d. The provisions of Specification 3.0.4 are not applicable.

See ITS 3/4.4.10.1

SURVEILLANCE REQUIREMENTS

5.5.5

4.4.10.1 In addition to the requirements of Specification 4.0.5, each reactor coolant pump flywheel shall be inspected by either qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle of one-half the outer radius or a surface examination (magnetic particle testing and/or penetrant testing) of exposed surfaces defined by the volume of the disassembled flywheels once every 10 years.

Add proposed ITS 5.5.5 generic program statement

A.13

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Reactor Coolant Pump Flywheel Inspection Program Surveillance Frequency.

Attachment 1, Volume 16, Rev. 0, Page 116 of 256

ITS

A.1

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.6 CONTAINMENT SYSTEMS

See ITS 3.6.1

CONTAINMENT LEAKAGE

LIMITING CONDITION FOR OPERATION

Add proposed ITS 5.5.14 and 5.5.14.a

3.6.1.2 Containment leakage rates shall be limited to:

5.5.14.b, 5.5.14.c, 5.5.14.d.1

a. An overall integrated leakage rate of ≤ L_a, 0.25 percent by weight of the containment air per 24 hours at P_a, 12 psig, and

A.7

5.5.14.d.1

b. A combined leakage rate of ≤ 0.60 L_a for all penetrations and valves subject to Types B and C tests when pressurized to P_a.

L.2

APPLICABILITY: MODES 1, 2, 3 and 4.

See ITS 3.6.1

ACTION:

5.5.14.d.1

With either (a) the measured overall integrated containment leakage rate exceeding 0.75 L_a, or (b) with the measured combined leakage rate for all penetrations and valves subject to Types B and C tests exceeding 0.60 L_a, restore the overall integrated leakage rate to ≤ 0.75 L_a and the combined leakage rate for all penetrations and valves subject to Types B and C tests to ≤ 0.60 L_a prior to increasing the Reactor Coolant System temperature above 200°F.

L.2

SURVEILLANCE REQUIREMENTS

5.5.14.a

4.6.1.2 Perform leakage rate testing in accordance with 10 CFR 50 Appendix J Option B, except as modified by NRC-approved exemptions, and Regulatory Guide 1.163, dated September 1995. See Note 1.

a. Each containment air lock shall be verified to be in compliance with the requirements of Specification 3.6.1.3.

See ITS 3.6.1

b. The provisions of Specification 4.0.2 are not applicable.

A.7

Add proposed ITS 5.5.14.e

A.7

Notes:

5.5.14.a.1

1 The Type A testing frequency specified in NEI 94-01, Revision 0, Paragraph 9.2.3, as "...at least once per 10 years based on acceptable performance history" is modified to be "...at least once per 15 years based on acceptable performance history." This change applies only to the interval following the Type A test performed in May 1992.

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.6 CONTAINMENT SYSTEMS

CONTAINMENT AIR LOCKS

See ITS 3.6.2

LIMITING CONDITION FOR OPERATION

3.6.1.3 Each containment air lock shall be OPERABLE with:

a. Both doors closed except when the air lock is being used for normal transit entry and exit through the containment, then at least one air lock door shall be closed, and

5.5.14.d.2.a), 5.5.14.b

b. An overall air lock leakage rate of $\leq$ 0.05 L_a at P_a, 12.0 psig.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

See ITS 3.6.2

With an air lock inoperable, maintain at least one door closed; restore the air lock 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.

SURVEILLANCE REQUIREMENTS

4.6.1.3 Each containment air lock shall be demonstrated OPERABLE:

5.5.14.a

a. In accordance with 10 CFR 50 Appendix J Option B and Regulatory Guide 1.163, dated September 1995, and

See ITS 3.6.2

b. At least once per 6 months by verifying that only one door in each air lock can be opened at a time.

ITS

A.1

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.7 PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS

Add proposed ITS 5.5.9 generic program statement

A.9

4.7.5.1 The control room emergency ventilation system shall be demonstrated OPERABLE:

a. Deleted

See ITS 3.7.10

b. At least once per 31 days on a STAGGERED TEST BASIS by initiating flow through the HEPA filter and charcoal adsorber train and verifying that the system operates for at least 15 minutes.

L.3

A.8

24

5.5.9 c. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system, by:

while it is in operation that could adversely affect the filter bank or charcoal adsorber capability

5.5.9.b 1. Verifying that the charcoal adsorbers remove ≥ 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 6000 cfm ± 10%.

5.5.9.a 2. Verifying that the HEPA filter banks remove ≥ 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 6000 cfm ± 10%.

LA.5

5.5.9.c 3. Verifying within 31 days after removal that a laboratory analysis of a carbon sample from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers shows a penetration of less than or equal to 1.0% for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989, 30°C, 95% R.H. The carbon samples not obtained from test canisters shall be prepared by either:

5.5.9.c.1 a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

5.5.9.c.2 b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

5.5.9.a, 5.5.9.b 4. Verifying a system flow rate of 6000 cfm ± 10% during system operation when tested in accordance with ANSI N510-1975.

Attachment 1, Volume 16, Rev. 0, Page 119 of 256

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.7 PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

5.5.9 d. After every 720 hours of charcoal adsorber operation by either:

LA.5

5.5.9.c 1. Verifying within 31 days after removal that a laboratory analysis of a carbon sample obtained from a test canister shows a penetration of less than or equal to 1.0% for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989, 30°C, 95% R.H; or

LA.5

5.5.9.c 2. Verifying within 31 days after removal that a laboratory analysis of at least two carbon samples shows a penetration of less than or equal to 1.0% for radioactive methyl iodide when the samples are tested in accordance with ASTM D3803-1989, 30°C, 95% R.H. and the samples are prepared by either:

5.5.9.c.1 a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

5.5.9.c.2 b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also:

a) Verifying that the charcoal adsorbers remove ≥ 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 6000 cfm ± 10%, and

L.4

b) Verifying that the HEPA filter banks remove ≥ 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 6000 cfm ± 10%.

ITS 5.5

ITS

A.1

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.7 PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

L.3

24

5.5.9

e. At least once per 18 months by:

5.5.9.d

1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches Water Gauge while operating the ventilation system at a flow rate of 6000 cfm plus or minus 10%.

2. a. Verifying that on a Safety Injection Signal from Unit 1, the system automatically operates in the pressurization/cleanup mode.

b. Verifying that on a Safety Injection Signal from Unit 2, the system automatically operates in the pressurization/cleanup mode.

See ITS 3.3.7 and ITS 3.7.10

3. Verifying that the system maintains the control room envelope/pressure boundary at a positive pressure of greater than or equal to 1/16 inch W. G. relative to the outside atmosphere at a system flow rate of 6000 cfm plus or minus 10% with a makeup air flow rate of $\leq$ 1000 cfm.

See ITS 3.7.10

5.5.9

5.5.9.a

f. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 6000 cfm plus or minus 10%.

5.5.9

5.5.9.b

g. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1975 while operating the ventilation system at a flow rate of 6000 cfm plus or minus 10%.

A.9

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test Frequencies.

Attachment 1, Volume 16, Rev. 0, Page 121 of 256

ITS

A.1

PLANT SYSTEMS

3/4.7.6 ESF VENTILATION SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.6.1 Two independent ESF ventilation system exhaust air filter trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

With one ESF ventilation system exhaust air filter train inoperable, restore the inoperable train to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

See ITS 3.7.12

SURVEILLANCE REQUIREMENTS

Add proposed ITS 5.5.9 generic program statement

A.9

4.7.6.1 Each ESF ventilation system exhaust air filter train shall be demonstrated OPERABLE:

See ITS 3.7.12

a. At least once per 31 days on a STAGGERED TEST BASIS by initiating, from the control room, flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for at least 15 minutes.

L.3

A.8

24 months

5.5.9 b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system by:

while it is in operation that could adversely affect the filter bank or charcoal adsorber capability

1. Deleted.

5.5.9.b 2. Verifying that the charcoal adsorbers remove ≥ 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 25,000 cfm ± 10%.

5.5.9.a 3. Verifying that the HEPA filter banks remove ≥ 99% of the DOP when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 25,000 cfm ± 10%.

D. C. COOK - UNIT 2 3/4 7-17 Amendment No111

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.7 PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

LA.5

5.5.9.c

4. Verifying ~~within 31 days after removal~~ that a laboratory analysis of a carbon sample from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers shows a penetration of less than or equal to 5% for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989, 30°C, 95% R.H., and ≥ 45.5 fpm face velocity. The carbon samples not obtained from test canisters shall be prepared by either:

5.5.9.c.1

a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

5.5.9.c.2

b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

~~Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 25,000 cfm plus or minus 10%.~~

L.4

5.5.9.a, 5.5.9.b

5. Verifying a system flow rate of 25,000 cfm plus or minus 10% during system operation when tested in accordance with ANSI N510-1980.

5.5.9

c. After every 720 hours of charcoal adsorber operation by either:

LA.5

5.5.9.c

1. Verifying ~~within 31 days after removal~~ that a laboratory analysis of a carbon sample obtained from a test shows a penetration of less than or equal to 5% for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989, 30°C, 95% R.H., and ≥ 45.5 fpm face velocity; or

LA.5

5.5.9.c

2. Verifying ~~within 31 days after removal~~ that laboratory analysis of at least two carbon samples shows a penetration of less than or equal to 5% for radioactive methyl iodide when the samples are tested in accordance with ASTM D3803-1989, 30°C, 95% R.H., and ≥ 45.5 fpm face velocity and the samples are prepared by either:

5.5.9.c.1

a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

ITS

A.1

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

5.5.9.c.2

b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 25,000 cfm plus or minus 10%.

L.4

L.3

24

5.5.9

d. At least once per 18 months by:

5.5.9.d

1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 6 inches Water Gauge while operating the ventilation system at a flow rate of 25,000 cfm plus or minus 10%.

2. Deleted.

3. Verifying that the standby fan starts automatically on a Containment Pressure--High-High Signal and directs its exhaust flow through the HEPA filters and charcoal adsorber banks on a Containment Pressure--High-High Signal.†

See ITS 3.7.12

5.5.9

e. After each complete or partial replacement of a HEPA filter bank by

5.5.9.a

verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 25,000 cfm plus or minus 10%.

5.5.9

f. After each complete or partial replacement of a charcoal adsorber

5.5.9.b

bank by verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 25,000 cfm plus or minus 10%.

A.9

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test Frequencies.

† The provisions of Technical Specification 4.0.8 are applicable.

See ITS 3.7.12

ITS 5.5

ITS

A.1

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.8 ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

4.8.1.1.2 Each diesel generator shall be demonstrated OPERABLE:

a. In accordance with the frequency specified in Table 4.8-1 on a STAGGERED TEST BASIS by:

1. Verifying the fuel level in the day tank,

2. Verifying the fuel level in the fuel storage tank,

3. Verifying that the fuel transfer pump can be started and that it transfers fuel from the storage system to the day tank,

4. Verifying that the diesel starts from standby conditions and achieves in less than or equal to 10 seconds, voltage = 4160±420 V, and frequency = 60±1.2 Hz,*

5. Verifying the diesel is synchronized and loaded and operates for greater than or equal to 60 minutes at a load of 3500 kw**, and

6. Verifying that the diesel generator is aligned to provide standby power to the associated emergency busses.

b. By removing accumulated water***:

1) From the day tank at least once per 31 days and after each occasion when the diesel is operated for greater than 1 hour, and

2) From the storage tanks at least once per 31 days.

5.5.11.a c. By sampling new fuel oil**** in accordance with the applicable guidelines of ASTM D4057-81 prior to adding new fuel to the storage tanks and

5.5.11.a 1) By verifying, in accordance with the tests specified in ASTM D975-81 and prior to adding the new fuel to the storage tanks, that the sample has:

Add proposed ITS 5.5.11 generic program statement

See ITS 3.8.1 and ITS 3.8.3

See ITS 3.8.1

See ITS 3.8.3

See ITS 3.8.1

See ITS 3.8.1 and ITS 3.8.3

See ITS 3.8.1

See ITS 3.8.3

LA.6

A.10

* The diesel generator start (10 seconds) from standby conditions shall be performed at least once per 184 days in these surveillance tests. All other engine starts for the purpose of this surveillance testing and compensatory action may be at reduced acceleration rates as recommended by the manufacturer so that mechanical stress and wear on the diesel engine are minimized.

** Momentary load transients do not invalidate this test.

*** The actions to be taken should any of the properties be found outside of specified limits are defined in the Bases.

See ITS 3.8.1

See ITS 3.8.3

Attachment 1, Volume 16, Rev. 0, Page 125 of 256

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.8 ELECTRICAL POWER SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

5.5.11.a.2

a) A kinematic viscosity of greater than or equal to 1.9 centistokes but less than or equal to 4.1 centistokes at 40°C (alternatively, Saybolt viscosity, SUS at 100°F of greater than or equal to 32.6 but less than or equal to 40.1), if gravity was not determined by comparison with supplier's certification.

5.5.11.a.2

b) A flash point equal to or greater than 125°F.

5.5.11.a.1

2) By verifying, in accordance with the test specified in ASTM D1298-80 and prior to adding the new fuel to the storage tanks, that the sample has either an API gravity of greater than or equal to 30 degrees but less than or equal to 40 degrees at 60°F or an absolute specific gravity at 60/60°F of greater than or equal to 0.82 but less than or equal to 0.88, or an API gravity of within 0.3 degrees at 60°F when compared to the supplier's certificate or a specific gravity of within 0.0016 at 60/60°F when compared to the supplier's certificate.

5.5.11.a.3

3) By verifying, in accordance with the test specified in ASTM D4176-82 and prior to adding new fuel to the storage tanks, that the sample has a clear and bright appearance with proper color.

5.5.11.b

4) By verifying within 31 days of obtaining the sample that the other properties specified in Table 1 of ASTM D975-81 are within the appropriate limits when tested in accordance with ASTM D975-81 except that the analysis for sulfur may be performed in accordance with ASTM D2622-82.

5.5.11c

d. At least once per 31 days by obtaining a sample of fuel oil from the storage tanks in accordance with ASTM D2276-83, and verifying that total particulate contamination is less than 10 mg/liter when tested in accordance with ASTM D2276-83, Method A*.

e. At least once per 18 months, during shutdown, by:

1. Subjecting the diesel engine to an inspection in accordance with procedures prepared in conjunction with its manufacturer's recommendations for this class of standby service,

* The actions to be taken should any of the properties be found outside of the specified limits are defined in the Bases.

within limits

LA.6

within limits

within limits

LA.6

LA.6

of new fuel oil, other than those addressed in Specification 5.5.11.a above,

L.5

LA.6

See ITS 3.8.3

See ITS 3.8.1

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program test Frequencies.

A.10

See ITS 3.8.3

ITS 5.5

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.9 REFUELING OPERATIONS

STORAGE POOL VENTILATION SYSTEM**

LIMITING CONDITION FOR OPERATION

3.9.12 The spent fuel storage pool exhaust ventilation system shall be OPERABLE.

See ITS 3.7.13

APPLICABILITY: Whenever irradiated fuel is in the storage pool.

ACTION:

a. With no fuel storage pool exhaust ventilation system OPERABLE, suspend all operations involving movement of fuel within the storage pool or crane operation with loads over the storage pool until at least one spent fuel storage pool exhaust ventilation system is restored to OPERABLE status.*

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

Add proposed ITS 5.5.9 generic program statement

A.9

4.9.12 The above required fuel storage pool ventilation system shall be demonstrated OPERABLE:

See ITS 3.7.13

a. At least once per 31 days by initiating flow through the HEPA filter and charcoal adsorber train and verifying that the train operates for at least 15 minutes.

24

L.3

5.5.9

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the system, by:

while it is in operation that could adversely affect the filter bank or charcoal adsorber capability

A.8

1. Deleted.

5.5.9.b

2. Verifying that the charcoal adsorbers remove ≥ 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the exhaust ventilation system at a flow rate of 30,000 cfm ± 10%.

---

* The crane bay roll-up door and the south door of the auxiliary building crane bay may be opened under administrative control during movement of fuel within the storage pool or crane operation with loads over the storage pool.

See ITS 3.7.13

** Shared system with D. C. COOK - UNIT 1.

Attachment 1, Volume 16, Rev. 0, Page 127 of 256

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.9 REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

5.5.9.a

3. Verifying that the HEPA filter banks remove greater than or equal to 99% of the DOP when they are tested in-place in accordance with ANSI N510-1980 while operating the exhaust ventilation system at a flow rate of 30,000 cfm plus or minus 10%.

LA.5

5.5.9.c

4. Verifying ~~within 31 days after removal~~ that a laboratory analysis of a carbon sample from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers shows a penetration of less than or equal to 5% for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989, 30°C, 95% R.H., and ≥ 46.8 fpm face velocity. The carbon samples not obtained from test canisters shall be prepared by either:

5.5.9.c.1

(a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

5.5.9.c.2

(b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 30,000 cfm plus or minus 10%.

L.4

5.5.9.a, 5.5.9.b

5. Verifying a system flow rate of 30,000 cfm plus or minus 10% during system operation when tested in accordance with ANSI N510-1980.

5.5.9

c. After every 720 hours of charcoal adsorber operation by either:

LA.5

5.5.9.c

1. Verifying ~~within 31 days after removal~~ that a laboratory analysis of a carbon sample obtained from a test canister shows a penetration of less than or equal to 5% for radioactive methyl iodide when the sample is tested in accordance with ASTM D3803-1989, 30°C, 95%,R.H., and ≥ 46.8 fpm face velocity.

Attachment 1, Volume 16, Rev. 0, Page 128 of 256

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.9 REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

LA.5

5.5.9.c 2. Verifying within 31 days after removal that laboratory analysis of at least two carbon samples shows a penetration of less than or equal to 5% for radioactive methyl iodide when the samples are tested in accordance with ASTM D3803-1989, 30°C, 95% R.H., and ≥ 46.8 *fpm face velocity* and the samples are prepared by either:

5.5.9.c.1 (a) Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed, or

5.5.9.c.2 (b) Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, the system shall be demonstrated OPERABLE by also verifying that the charcoal adsorbers remove greater than or equal to 99% of a halogenated *hydrocarbon refrigerant test gas when they are tested in-place in accordance with* ANSI N510-1980 while operating the ventilation system at a flow rate of 30,000 cfm plus or minus 10%.

L.4

24

L.3

5.5.9 d. At least once per 18 months by:

5.5.9.d 1. Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than or equal to 6 inches Water Gauge while operating the exhaust ventilation system at a flow rate of 30,000 cfm plus or minus 10%.

2. Deleted.

3. Verifying that on a high-radiation signal, the system automatically directs its exhaust flow through the charcoal adsorber banks and automatically shuts down the storage pool ventilation system supply fans.

4. Verifying that the exhaust ventilation system maintains the spent fuel storage pool area at a negative pressure of greater than or equal to 1/8 inches Water Gauge relative to the *outside atmosphere during system* operation.

See ITS 3.7.13

ITS

A.1

REFUELING OPERATIONS

SURVEILLANCE REQUIREMENTS (Continued)

5.5.9

5.5.9.a

e. After each complete or partial replacement of a HEPA filter bank by verifying that the HEPA filter banks remove ≥ 99% of the DOP when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 30,000 cfm ± 10%.

5.5.9

5.5.9.b

f. After each complete or partial replacement of a charcoal adsorber bank by verifying that the charcoal adsorbers remove ≥ 99% of a halogenated hydrocarbon refrigerant test gas when they are tested in-place in accordance with ANSI N510-1980 while operating the ventilation system at a flow rate of 30,000 cfm ± 10%.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test Frequencies.

A.9

ITS

A.1

3/4.11 RADIOACTIVE EFFLUENTS

LIQUID HOLDUP TANKS*

LIMITING CONDITION FOR OPERATION

Add proposed ITS 5.5.10 generic program statement — A.11

5.5.10, 5.5.10.c

3.11.1 The quantity of radioactive material contained in each of the following tanks shall be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases. — LA.7

a. Outside temporary tanks.

APPLICABILITY: At all times.

ACTION:

a. With the quantity of radioactive material in any of the above listed tanks exceeding the above limit, without delay suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents to within the limit. — LA.7

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

5.5.10.c

4.11.1 The quantity of radioactive material contained in each of the above listed tanks shall be determined to be within the above limit by analyzing a representative sample of the tank's contents at least once per 7 days when radioactive materials are being added to the tank. — LA.7

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Storage Tank Radioactivity Monitoring Program Surveillance Frequencies. — A.11

5.5.10.c

* Tanks included in this Specifications are those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tanks contents and that do not have tank over flows and surrounding area drains connected to the liquid radwaste treatment system.

ITS

A.1

RADIOACTIVE EFFLUENTS

3/4.11.2 GASEOUS EFFLUENTS

EXPLOSIVE GAS MIXTURE

LIMITING CONDITION FOR OPERATION

Add proposed ITS 5.5.10 generic program statement

A.11

5.5.10, 5.5.10.a

3.11.2.1 The concentration of oxygen in the waste gas holdup system shall be limited to less than or equal to 3% by volume if the hydrogen in the system is greater than or equal to 4% by volume.

LA.7

APPLICABILITY: At all times.

ACTION:

a. With the concentration of oxygen in the waste gas holdup system greater than 3% by volume but less than or equal to 4% by volume and containing greater than or equal to 4% hydrogen, restore the concentration of oxygen to less than or equal to 3% or reduce the hydrogen concentration to less than 4% within 96 hours.

b. With the concentration of oxygen in the waste gas holdup system or tank greater than 4% by volume and greater than 4% hydrogen by volume without delay suspend all additions of waste gases to the system or tank and reduce the concentration of oxygen to less than or equal to 3% or the concentration of hydrogen to less than or equal to 4% within 96 hours in the system or tank.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

LA.7

SURVEILLANCE REQUIREMENTS

5.5.10.a

4.11.2.1 The concentration of oxygen in the waste gas holdup system shall be determined to within the above limits by continuously monitoring the waste gases in the waste gas holdup system with the oxygen monitors required OPERABLE by Table 3.3-12 of Specification 3.3.3.9.

LA.7

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas Radioactivity Monitoring Program Surveillance Frequencies.

A.11

COOK NUCLEAR PLANT - UNIT 2 3/4 11-2 AMENDMENT NO. ~~54~~, ~~138~~, 175

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.11 RADIOACTIVE EFFLUENTS

GAS STORAGE TANKS

LIMITING CONDITION FOR OPERATION

Add proposed ITS 5.5.10 generic program statement

A.11

5.5.10, 5.5.10.b

3.11.2.2 The quantity of radioactivity contained in each gas storage tank shall be limited to 43,800 curies noble gas (considered as Xe-133).

LA.7

APPLICABILITY: At all times.

ACTION:

a. With the quantity of radioactive material in any gas storage tank exceeding the above limit, without delay suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents to within the limit.

LA.7

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

5.5.10.b

4.11.2.2 The quantity of radioactive material contained in each gas storage tank shall be determined to be within the above limit at least once per 7 days whenever radioactive materials are added to the tank and at least once per 24 hours during primary coolant system degassing operations.

LA.7

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Storage Tank Radioactivity Monitoring Program Surveillance Frequencies.

A.11

COOK NUCLEAR PLANT-UNIT 2 Page 3/4 11-3 AMENDMENT ~~51~~, ~~138~~, ~~168~~, ~~175~~, 214

ITS 5.5

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2, February 1978.

b. Deleted.

c. Deleted.

d. PROCESS CONTROL PROGRAM implementation.

e. OFFSITE DOSE CALCULATION MANUAL implementation.

f. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 1.21, Rev. 1, June 1974, and Regulatory Guide 4.1, Rev. 1, April 1975.

See ITS 5.4

5.5.4

g. Component Cyclic or Transient Limits program, which provides controls to track the UFSAR, Section 4.1, cyclic and transient occurrences to ensure that components are maintained within the limits.

A.12

h. Fire Protection Program implementation.

6.8.2 Each procedure and administrative policy of Specification 6.8.1 above, and changes thereto, including temporary changes, shall be reviewed prior to implementation as set forth in Qualification Assurance Program Description, Appendix C, Section 6.5.

See ITS 5.4

6.8.3 Deleted.

Attachment 1, Volume 16, Rev. 0, Page 134 of 256

ITS

A.1

6.0 ADMINISTRATIVE CONTROLS

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

a. Shall be documented and records of reviews performed shall be retained as required by the Quality Assurance Program Description, Appendix C, Section 6.10.2.n. This documentation shall contain:

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

2. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

b. Shall become effective after review and acceptance by the PORC and the approval of the Plant Manager.

See CTS 6.0

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

5.5.1.c 6.14.1 Changes to the ODCM:

5.5.1.c.1 a. Shall be documented and records of reviews performed shall be retained ~~as required by the Quality Assurance Program Description, Appendix C, Section 6.10.2.n~~. This documentation shall contain:

LA.8

5.5.1.c.1.a) 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

5.5.1.c.1.b) 2. A determination that the change will maintain the level of radioactive effluent control pursuant to 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

5.5.1.c.2 b. Shall become effective after ~~review and acceptance by the PORC and~~ the approval of the Plant Manager.

LA.8

LA.9

5.5.1.c.3 c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

Add proposed ITS 5.5.12, ITS 5.5.13, and ITS 5.5.15

M.2

Attachment 1, Volume 16, Rev. 0, Page 135 of 256

DISCUSSION OF CHANGES
ITS 5.5, PROGRAMS AND MANUALS

ADMINISTRATIVE CHANGES

A.1 In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.

A.2 CTS 6.8.4.a specifies the requirements for the Radioactive Effluent Controls Program, however there is no statement as to whether or not the provisions of CTS 4.0.2 and CTS 4.0.3 are applicable. ITS 5.5.3 states that the provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program Surveillance Frequencies. This changes the CTS by adding the allowances of ITS SR 3.0.2 and SR 3.0.3 to the Radioactive Effluent Controls Program.

This statement is needed to maintain allowances for Surveillance Frequency extensions contained in the ITS since ITS SR 3.0.2 and SR 3.0.3 are not normally applied to Frequencies identified in the Administrative Controls Chapter of the ITS. In addition, prior to Amendments 189 (Unit 1) and 175 (Unit 2), dated February 10, 1995, these requirements were located in the LCO sections of the Technical Specifications. Amendments 189 (Unit 1) and 175 (Unit 2) relocated the Radiological Effluents Technical Specification from the Technical Specifications to other plant controlled documents, and added CTS 6.8.4.a to the CTS. Since this change is a clarification required to maintain provisions that would be allowed in the LCO sections of the Technical Specifications, it is considered administrative in nature. This change is designated as administrative because it does not result in technical changes to the CTS.

A.3 CTS 4.0.5.b does not include all of the required Surveillance Frequencies for performing inservice testing activities. ITS 5.5.6.a adds a new required Frequency of "Biennially or every 2 years." This changes the CTS by adding a new Frequency to the required Frequencies for performing inservice testing activities.

This change is acceptable because the change does not include any new requirements, but only provides clarification of required Frequencies for performing inservice testing activities. Therefore, this change is considered administrative. This change is designated as administrative because it does not result in technical changes to the CTS.

A.4 CTS 4.0.5.d states that the performance of the above testing activities shall be in addition to other specified Surveillance Requirements. ITS 5.5.6 does not include a similar statement. This changes the CTS by deleting the statement.

CTS 4.0.5.d restates that all applicable requirements must be met. Repeating this overall requirement as a specific detail is redundant and unnecessary. Therefore, this detail can be omitted without any technical change in the

Attachment 1, Volume 16, Rev. 0, Page 136 of 256

requirements and is considered administrative in nature. This change is designated as administrative because it does not result in technical changes to the CTS.

A.5 CTS 4.0.5 specifies the requirements for the Inservice Testing Program, however there is no statement whether the provisions of CTS 4.0.3 are applicable. ITS 5.5.6.c states that the provisions of SR 3.0.3 are applicable to the inservice testing activities. This changes the CTS by adding the allowances of ITS SR 3.0.3 to the Technical Specification Inservice Testing Program requirements.

This statement is needed to maintain allowances for Surveillance Frequency extensions contained in the ITS since ITS SR 3.0.3 is not normally applied to Frequencies identified in the Administrative Controls Chapter of the ITS. Since this change is a clarification required to maintain provisions that would be allowed in the LCO sections of the Technical Specifications, it is considered administrative in nature. This change is designated as administrative because it does not result in a technical change to the CTS.

A.6 CTS 4.4.5.1, 4.4.5.2, 4.4.5.3, and 4.4.5.4, including Table 4.4-1 and 4.4-2, specify the requirements for the steam generator tube surveillance testing activities. In the ITS, these requirements are included as ITS 5.5.7, "Steam Generator (SG) Program," and a generic statement describing the program has been included. In addition, a statement has been added which states that the provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Steam Generator Program test Frequencies. This changes the CTS by adding a generic description of the program and specifically stating that the allowances of ITS SR 3.0.2 and SR 3.0.3 are applicable to the Steam Generator Program.

The ITS SR 3.0.2 and SR 3.0.3 statement is needed to maintain allowances for Surveillance Frequency extensions contained in the ITS since ITS SR 3.0.2 and SR 3.0.3 are not normally applied to Frequencies identified in the Administrative Controls Chapter of the ITS. Since this change is a clarification required to maintain provisions that are allowed in the CTS (since CTS 4.0.2 and CTS 4.0.3 apply to the Surveillances of CTS 3/4.4.5), it is considered acceptable. In addition, the generic statement describing the program is also acceptable. This change is designated as administrative because it does not result in technical changes to the CTS.

A.7 CTS 4.6.1.2 requires the performance of containment leakage rate testing in accordance with 10 CFR 50 Appendix J Option B, except as modified by NRC-approved exemptions, and Regulatory Guide 1.1.63, dated September 1995. CTS 4.6.1.2 is also modified by two exceptions. CTS 4.6.1.2.b states that the requirements of Specification 4.0.2 are not applicable. CTS 4.6.1.3.a contains a requirement to perform air lock testing in accordance with 10 CFR 50 Appendix J Option B and Regulatory Guide 1.163, dated September 1995. ITS 5.5.14.a requires a program to establish the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September, 1995, as modified by the listed exceptions. ITS 5.5.14.e states that the provision of SR 3.0.3 are

applicable to the Containment Leakage Rate Testing Program. This changes the CTS by including the requirements of CTS 4.6.1.2 and 4.6.1.3 in a program, adding the statement that the provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program, and deleting the statement that the provisions of Specification 4.0.2 are not applicable.

This change is acceptable because no changes have been made to the existing requirements. The CTS and proposed ITS 5.5.14 continue to require the same testing to be performed. The statement associated with CTS 4.0.2 is not needed since the Frequency extensions of ITS SR 3.0.2 are not applied to Frequencies identified in the Administrative Controls Section of the ITS, unless specifically identified. The statement associated with ITS SR 3.0.3 is needed to maintain allowances for Surveillance Frequency extensions contained in the ITS since ITS SR 3.0.2 and SR 3.0.3 are not applied to Frequencies identified in the Administrative Controls Chapter of the ITS, unless specifically identified. Since these changes are clarifications required to maintain provisions that would be allowed in the LCO sections of the Technical Specifications, it is considered administrative in nature. This change is designated as administrative because it does not result in technical changes to the CTS.

A.8 CTS 4.7.5.1.c, 4.7.6.1.b, and 4.9.12.b require the performance of ventilation filter testing "following painting, fire, or chemical release in any ventilation zone communicating with the system." ITS 5.5.9 requires the performance of the same ventilation filter testing "following painting, fire, or chemical release in any ventilation zone communicating with the system while it is in operation that could adversely affect the filter bank or charcoal adsorber capability." This changes the CTS by requiring the filter testing to be performed only if the associated system was in operation and the painting, fire, or chemical release is considered significant enough to adversely affect the filter bank or charcoal adsorber capability.

The purpose of ITS 5.5.9 is to ensure that ventilation filter testing is only performed when there is a potential adverse impact on the affected filter. Current CNP practice is that not all painting, fire, or chemical release results in the need to perform certain ventilation filter tests. Only painting, fire, or chemical release that could affect the functional capability of the ventilation filter trains (i.e., that are significant) would require performance of the tests. The words "that could adversely affect the filter bank or charcoal adsorber capability" were added for clarity and consistency with current practice to avoid a misinterpretation that any painting, fire, or chemical release (such as using a small can of paint to do touch-up work) would result in the need to perform the tests. Similarly, the wording "while it is in operation" was added to clarify that this is the time when the painting, fire, or chemical release could be communicating with the system. This clarification is administrative, and is consistent with other ITS submittals. In addition, the NRC in a letter to Entergy Operations, Inc., dated September 11, 1997, supported the clarification that not all painting, fires, or chemical releases required the filter trains to be tested. Furthermore, this clarification is also consistent with Regulatory Guide 1.52, Revision 3. This change is designated as administrative because it does not result in technical changes to the CTS.

DISCUSSION OF CHANGES
ITS 5.5, PROGRAMS AND MANUALS

A.9 The Surveillances (CTS 4.7.5.1.c, 4.7.5.1.d, 4.7.5.1.e.1, 4.7.5.1.f, and 4.7.5.1.g) associated with the ventilation filter testing for the Control Room Emergency Ventilation (CREV) System, the Surveillances (CTS 4.7.6.1.b, 4.7.6.1.c, 4.7.6.1.d.1, 4.7.6.1.e, and 4.7.6.1.f) associated with the ventilation filter testing for the Engineered Safety Features (ESF) Ventilation System, and the Surveillances (CTS 4.9.12.b, 4.9.12.c, 4.9.12.d.1, 4.9.12.e, and 4.9.12.f) associated with the filter testing for the Fuel Handling Area Exhaust Ventilation (FHAEV) System have been placed in a program in the proposed Administrative Controls Chapter 5.0 (ITS 5.5.9). As such, a general program statement has been added as ITS 5.5.9. Also, a statement of the applicability of ITS SR 3.0.2 and SR 3.0.3 is needed to clarify that the allowances for Surveillance Frequency extension do apply. This changes the CTS by moving the ventilation filter testing Surveillances associated with the CREV, ESF Ventilation, and FHAEV Systems to a program in ITS 5.5 and specifically stating the applicability of ITS SR 3.0.2 and SR 3.0.3 in the program.

The addition of the program statement is acceptable because it is describing the intent of the CTS Surveillances. The addition of the ITS SR 3.0.2 and SR 3.0.3 statement is a clarification needed to maintain provisions that are currently allowed in the LCO and SR sections of the CTS, therefore it is considered acceptable. This change is designated as administrative because it does not result in technical changes to the CTS.

A.10 The Surveillances associated with diesel fuel oil testing (CTS 4.8.1.1.2.c and d) have been placed in a program in the proposed Administrative Controls Chapter 5.0 (ITS 5.5.11). As such, a general program statement has been added as ITS 5.5.11. Also, a statement of the applicability of ITS SR 3.0.2 and SR 3.0.3 is needed to clarify that the allowances for Surveillance Frequency extension do apply. This changes the CTS by moving the diesel fuel oil testing Surveillances to a program in ITS 5.5 and specifically stating the applicability of ITS SR 3.0.2 and SR 3.0.3 in the program.

The addition of the program statement is acceptable because it is describing the intent of the CTS Surveillances. The addition of the ITS SR 3.0.2 and SR 3.0.3 statement is a clarification needed to maintain provisions that are currently allowed in the LCO and SR sections of the CTS, therefore it is considered acceptable. This change is designated as administrative because it does not result in technical changes to the CTS.

A.11 The liquid holdup tank requirements in CTS 3/4.11.1, the explosive gas mixture requirements in CTS 3/4.11.2.1, and the gas storage tank requirements in CTS 3/4.11.2.2 have been placed in a program in the proposed Administrative Controls Chapter 5.0 (ITS 5.5.10). As such, a general program statement has been added. Also, a statement of applicability of ITS SR 3.0.2 and SR 3.0.3 is needed to clarify that the allowances for Surveillance Frequency extensions do apply. This changes the CTS by moving the liquid holdup tank, explosive gas mixture, and gas storage tank requirements to a program in ITS 5.5.10 and specifically stating the applicability of ITS SR 3.0.2 and SR 3.0.3 in the program.

The addition of the program statement is acceptable because it is describing the intent of the CTS Specifications. The addition of the ITS SR 3.0.2 and SR 3.0.3

Attachment 1, Volume 16, Rev. 0, Page 139 of 256

statement is a clarification needed to maintain provisions that are currently allowed in the LCO and SR sections of the CTS, therefore it is considered acceptable. This change is designated as administrative because it does not result in technical changes to the CTS.

A.12 CTS 6.8.1.g requires written procedures to be established, implemented and maintained covering the activities of the component cyclic or transient limits program, which provides controls to track the UFSAR Section 4.1, cyclic and transient occurrences to ensure that components are maintained within the limits. ITS 5.5.4 requires a program to track the UFSAR, Section 4.1 cyclic and transient occurrences to ensure that components are maintained within the design limits. This changes the CTS by placing the requirements of the Component Cyclic or Transient Limits Program currently located in the procedure section of the CTS Administration Controls Chapter into the Program section of the ITS Administrative Controls Chapter.

One purpose of CTS 6.8.1.g is to ensure that there is a program to track the UFSAR, Section 4.1 cyclic and transient occurrences to ensure that components are maintained within the design limits. Since this change is a clarification that CTS 6.8.1.g also requires a program to be established, it is considered acceptable. This change is designated as administrative because it does not result in technical changes to the CTS.

A.13 CTS 4.4.10.1 requires the inspection of each reactor coolant pump flywheel. ITS 5.5.5 requires a program to provide for the inspection of each reactor coolant pump flywheel. In addition, a statement has been added which states the provisions of ITS SR 3.0.2 and SR 3.0.3 are applicable to the Reactor Coolant Pump Flywheel Inspection Program Surveillance Frequency. This changes the CTS by including the requirements of CTS 4.4.10.1 in a program in the Administrative Controls Chapter of the Technical Specifications instead of as a Surveillance and specifically stating that the allowances of ITS SR 3.0.2 and SR 3.0.3 are applicable to the Reactor Coolant Pump Flywheel Inspection Program Surveillance Frequency. Other changes to 3/4.4.10.1 is discussed in the Discussion of Changes for CTS 3/4.4.10.1.

This change is acceptable because no changes have been made to the existing requirements. The CTS and proposed ITS 5.5.5 continue to require the same reactor coolant pump flywheel inspections to be performed. The ITS SR 3.0.2 and SR 3.0.3 statement is needed to maintain allowances for Surveillance Frequency extensions contained in the CTS because ITS SR 3.0.2 and SR 3.0.3 are not normally applied to Frequencies identified in the Administrative Controls Chapter of the ITS. Since this change is a clarification required to maintain provisions that are allowed in the CTS (since CTS 4.0.2 and CTS 4.0.3 apply to the Surveillances of CTS 3/4.4.10), it is considered acceptable. This change is designated as administrative because it does not result in technical changes to the CTS.

A.14 (Unit 1 only) CTS 4.4.5.4.a does not contain a definition for Preservice Inspection. ITS 5.5.7.d.1.i) includes the definition. This changes the Unit 1 CTS by adding a definition for Preservice Inspection.

CTS 4.4.5.2.b, 4.4.5.3.a, and Table 4.4-1 (ITS 5.5.7.a.2, ITS 5.5.7.e.1, and ITS Table 5.5.7-1) refer to a preservice inspection. This proposed change is acceptable because the definition is consistent with the definition for preservice inspection in CTS 4.4.5.4.a.9 for Unit 2, and because ITS 5.5.7.a.2, 5.5.7.e.1, and Table 5.5.7-1 continue to refer to the preservice inspections. This change is designated as administrative because it does not result in technical changes to the CTS.

A.15 CTS 4.0.5 requires pump and valve testing per the requirements of Section XI of the ASME Boiler and Pressure Vessel Code. ITS 5.5.6 requires pump and valve testing per the requirements of the ASME Operation and Maintenance Standards and Guides (OM Codes). This changes the CTS by referring to the ASME OM Codes instead of ASME Boiler and Pressure Code, Section XI.

In the 1987 Addenda to the 1986 edition of ASME Boiler and Pressure Vessel Code, Section XI, the requirements for Inservice Testing were removed and relocated to the ASME/ANSI OM Codes. This change was endorsed in 10CFR50.55a. 10CFR50.55a(f) now addresses the requirements for inservice testing using the ASME/ANSI OM Codes and 10CFR50.55a(g) addresses the requirements for inservice inspection using ASME Boiler and Pressure Vessel Code, Section XI. The ITS has been revised to incorporate the current Code requirements. In addition, the terms weekly, monthly, and semiannually are not used in the applicable ASME/ANSI OM Codes. Therefore, these Frequencies have been deleted. This change is designated as administrative because it does not result in technical changes to the CTS.

MORE RESTRICTIVE CHANGES

M.1 License Conditions 2.H (Unit 1) and 2.G (Unit 2) provide the requirements for a System Integrity program. The program is not explicit as to which systems outside containment must be monitored. ITS 5.5.2 includes the requirements for the Leakage Monitoring Program and provides a list of systems that should be monitored because they could contain highly radioactive fluids during a serious transient or accident.

The purpose of the Leakage Monitoring Program is to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems added to the Specification include the Safety Injection System, Chemical and Volume Control System, Residual Heat Removal System, Containment Spray System, post accident sampling, and the boron injection tank injection flowpath of the Centrifugal Charging System. The change is acceptable because these systems are currently monitored to satisfy the current License Conditions and is a complete list of those systems that could contain highly radioactive fluids during a serious transient or accident. This change is designated as more restrictive because it adds an explicit list of systems to the Technical Specifications.

M.2 The CTS does not include program requirements for a Technical Specification Bases Control Program, Safety Function Determination Program, or Battery

DISCUSSION OF CHANGES
ITS 5.5, PROGRAMS AND MANUALS

Monitoring and Maintenance Program. The ITS includes programs for these activities. This changes the CTS be adding the following programs:

ITS 5.5.12, "Technical Specifications (TS) Bases Control Program";
ITS 5.5.13, "Safety Function Determination Program (SFDP)"; and
ITS 5.5.15, "Battery Monitoring and Maintenance Program."

The TS Bases Control Program is provided to specifically delineate the appropriate methods and reviews necessary for a change to the Technical Specification Bases. The Safety Function Determination Program is included to support implementation of the support system OPERABILITY characteristics of the Technical Specifications. The Battery Monitoring and Maintenance Program is included to provide for battery restoration and maintenance. The specific wording associated with these three programs may be found in ITS 5.5.12, ITS 5.5.13, and ITS 5.5.15. The changes are acceptable because they support implementation of the requirements of the ITS and the UFSAR. This change is designated as more restrictive because it imposes additional programmatic requirements in the Technical Specifications.

RELOCATED SPECIFICATIONS

None

REMOVED DETAIL CHANGES

LA.1 *(Type 6 - Removal of LCO, SR, or other TS requirement to the TRM, UFSAR, ODCM, QAPD, or IIP)* CTS 6.8.4.b, "Radiological Environmental Monitoring Program," describes a program to monitor the radiation and radionuclides in the environs of the plant. ITS Chapter 5.0 does not require such a program. This changes the CTS by moving the requirements for the Radiological Environmental Monitoring Program to the Offsite Dose Calculation Manual (ODCM).

The purpose of CTS 6.8.4.b is to provide representative measurements of radioactivity in the highest potential exposure pathways, and verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The removal of the requirement for this program from the Technical Specifications is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. ITS 5.6.2 still requires an annual report of the results of the "Radiological Environmental Monitoring Program." Also, this change is acceptable because these types of procedural details will be adequately controlled in the ODCM. Changes to the ODCM are controlled by the ODCM change control process in ITS 5.5.1, which ensures changes are properly evaluated. This change is designated as a less restrictive removal of requirement change because the requirements for a program are being removed from the Technical Specifications.

Attachment 1, Volume 16, Rev. 0, Page 142 of 256

DISCUSSION OF CHANGES
ITS 5.5, PROGRAMS AND MANUALS

LA.2 *(Type 6 – Removal of LCO, SR, or other TS requirement to the TRM, UFSAR, ODCM, QAPD, or IIP)* Operating License Conditions 2.I (Unit 1) and 2.H (Unit 2) specify that the Iodine Monitoring Program shall be implemented and provides a description of what the program shall include. ITS 5.5 does not include this program. This changes the CTS by moving the details of the Iodine Monitoring Program to the Technical Requirements Manual (TRM).

The removal of this requirement from the Technical Specifications is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. This program is required by the CNP Units 1 and 2 commitment to NUREG-0578, Item 2.1.8.c, as stated in a letter from R.S. Hunter (AEP) to Harold R. Denton (NRC) dated December 10, 1980. The program is designed to minimize radiation exposure to plant personnel in vital areas of the plant after an accident, and has no impact on nuclear safety or the health and safety of the public. The training aspect of the program is accomplished as part of the continual training program for personnel in the cognizant organizations, as well as during training for those individuals responsible for implementing the radiological emergency planning procedures. Provisions for monitoring and performing maintenance of the sampling and analysis equipment are addressed in chemistry and radiation protection procedures. This change is acceptable because the program requirements will be adequately controlled in the TRM. Any changes to the TRM are made under 10 CFR 50.59, which ensures changes are properly evaluated. This change is designated as a less restrictive removal of requirement change because requirements are being removed from the Technical Specifications.

LA.3 *(Type 6 - Removal of LCO, SR, or other TS requirement to the TRM, UFSAR, ODCM, QAPD, or IIP)* CTS 4.0.5 provides requirements for the Inservice Inspection Program. The ITS does not include Inservice Inspection Program requirements. In addition, since the Inservice Testing Program is the only requirement remaining, the reference to ASME Code Class 1, 2, and 3 "components" has been changed to "pumps and valves" for clarity. Pumps and valves are the only components related to the Inservice Testing Program (as described in CTS 4.0.5.a). This changes the CTS by moving these requirements from the Technical Specifications to the Inservice Inspection Program (IIP).

The removal of these requirements is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. The Technical Specifications still retain requirements for the affected components to be OPERABLE. Also, this change is acceptable because these requirements will be adequately controlled by the IIP, which is required by 10 CFR 50.55a. Compliance with 10 CFR 50.55a is required by the CNP Units 1 and 2 Operating Licenses. This change is designated as a less restrictive removal of requirement change because requirements are being removed from the Technical Specifications.

LA.4 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements*) CTS 4.0.5.a specifies that the Inservice Testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and

Attachment 1, Volume 16, Rev. 0, Page 143 of 256

applicable Addenda as required by 10 CFR 50, Section 50.55a. ITS 5.5.6 states that the Inservice Testing Program provides controls for inservice testing of ASME Code Class 1, 2, and 3 pumps and valves. This changes the CTS by moving these procedural details from the Technical Specifications to the Inservice Testing Program.

The removal of these details for meeting Technical Specification requirements from the Technical Specifications is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. The ITS still retains requirements for the control for inservice testing of ASME Code Class 1, 2, and 3 pumps and valves. Also, this change is acceptable because these types of details will be adequately controlled in the plant controlled Inservice Testing Program. Changes to the Inservice Testing Program will be controlled by the provisions of 10 CFR 50.55a. This change is designated as a less restrictive removal of detail change because the details for meeting Technical Specification requirements are being removed from the Technical Specifications.

LA.5 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements)* CTS 4.7.5.1.c.3, 4.7.5.1.d.1, 4.7.5.1.d.2, 4.7.6.1.b.4, 4.7.6.1.c.1, 4.7.6.1.c.2, 4.9.12.b.4, 4.9.12.c.1, and 4.9.12.c.2 require that within 31 days after removal of a carbon sample the laboratory analysis results are shown to be within limit. ITS 5.5.9.c requires the same analysis to be performed however the detail of "within 31 days after removal of a carbon sample" is not included. This changes the CTS by moving these procedural details from the Technical Specifications to the Technical Requirements Manual (TRM).

The removal of these details for performing Surveillance Requirements from the Technical Specifications is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. The ITS still retains the requirement to perform the testing at the appropriate Frequencies. Also, this change is acceptable because these types of procedural details will be adequately controlled in the TRM. Any changes to the TRM are made under 10 CFR 50.59, which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because procedural details for meeting Technical Specification requirements are being removed from the Technical Specifications.

LA.6 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements)* CTS 4.8.1.1.2.c, 4.8.1.1.2.c.1), 4.8.1.1.2.c.1)a), 4.8.1.1.2.c.1)b), 4.8.1.1.2.c.2), 4.8.1.1.2.c.3), 4.8.1.1.2.c.4), and 4.8.1.1.2.d specify test and sampling requirements for new diesel fuel oil and diesel fuel oil in the storage tanks in accordance with certain ASTM standards (i.e., D4057-81, D975-81, D1298-80, D4176-82, D2622-82, and D2276-83) and provide limits for kinematic viscosity, flash point, API gravity, absolute specific gravity, and specific gravity. ITS 5.5.11 does not include either the explicit reference to the ASTM standards or the specific limits, but continues to require the verification that the new and stored diesel fuel oil is tested in accordance with the applicable standards and that the parameters are within limits. This changes the CTS by

moving the procedural details on the testing requirements and the specific limits to the Bases of ITS 3.8.3.

The removal of these details for performing Surveillance Requirements from the CTS is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. The ITS still retains requirement to determine that new and stored diesel fuel oil are within the applicable limits. Also, this change is acceptable because these types of procedural details will be adequately controlled in the ITS Bases. Changes to the Bases are controlled by the Technical Specification Bases Control Program in Chapter 5. This program provides for the evaluation of changes to ensure the Bases are properly controlled. This change is designated as a less restrictive removal of detail change because procedural details for meeting Technical Specification requirements are being removed from the CTS.

LA.7 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements)* CTS 3/4.11.1 includes the details for implementing the requirements for the liquid holdup tank. CTS 3/4.11.2.1 includes the details for implementing the requirements for the explosive gas mixture. CTS 3/4.11.2.2 includes the details for implementing the requirements for the gas storage tank. The details for implementing these requirements, including the specific limits, are not included in the ITS. The ITS only includes a requirement to maintain a program for these requirements. This changes the CTS by moving these procedural details for implementing the requirements, including the specific limits, from the Technical Specifications to the Technical Requirements Manual (TRM).

The removal of these details for the specific limits, Applicability, Actions, and Surveillance Requirements from the Technical Specifications is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. ITS 5.5.10 still retains the requirement to include a program, which provides controls for potentially explosive gas mixtures contained in the Waste Gas Holdup System, the quantity of radioactivity contained in gas storage tanks, and the quantity of radioactivity contained in unprotected outdoor temporary liquid storage tanks. Also, this change is acceptable because these types of procedural details will be adequately controlled in the TRM. Any changes to the TRM are made under 10 CFR 50.59, which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because procedural details for meeting Technical Specification requirements are being removed from the Technical Specifications.

LA.8 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements)* CTS 6.14.1.a requires changes to the ODCM to be documented and records of reviews performed to be retained as required by the Quality Assurance Program Description, Appendix C, Section 6.10.2.n. CTS 6.14.1.b requires changes to the ODCM to be effective after review and acceptance by the PORC and the approval of the plant manager. ITS 5.5.1.c.1 requires changes to the ODCM to be documented and records of reviews performed to be retained. ITS 5.5.1.c.2 requires changes to the ODCM to become effective after the approval of the plant manager. This changes the CTS

by moving the record retention requirement reference and the PORC review and approval requirement to the Quality Assurance Program Description (QAPD).

The removal of these details, which are related to meeting Technical Specification requirements, from the Technical Specifications is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. ITS 5.5.1 still retains the requirement for changes to the ODCM. Also, this change is acceptable because these types of procedural details will be adequately controlled in the QAPD. Any changes to the QAPD are made under 10 CFR 50.54(a), which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because procedural details for meeting Technical Specification requirements are being removed from the Technical Specifications.

LA.9 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements)* CTS 6.14.1.b uses the title "Plant Manager." ITS 5.5.1.c.2 uses the generic title "plant manager." This changes the CTS by moving the specific CNP organizational title to the UFSAR and replacing it with a generic title.

The removal of these details, which are related to meeting Technical Specification requirements, from the Technical Specifications is acceptable because this type of information is not necessary to be included in Technical Specifications to provide adequate protection of public health and safety. The allowance to relocate the specific CNP organizational title out of the Technical Specifications is consistent with the NRC letter from C. Grimes to the Owners Groups Technical Specification Committee Chairmen, dated November 10, 1994. The various requirements of the plant manager are still retained in the ITS. Also, this change is acceptable because the removed information will be adequately controlled in the UFSAR. Any changes to the UFSAR are made under 10 CFR 50.59 or 10 CFR 50.71(e), which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because information related to meeting Technical Specification requirements are being removed from the Technical Specifications.

LESS RESTRICTIVE CHANGES

L.1 *(Category 10 – 18 to 24 Month Surveillance Frequency Change, Non-Channel Calibration Type)* License Conditions 2.H (Unit 1) and 2.G (Unit 2) specify that the integrated leak test requirements for each system outside containment that would or could contain highly radioactive fluids during a serious transient or accident must be performed at a frequency not to exceed refueling cycle intervals. ITS 5.5.2 specifies that the same test must be performed at least once per 24 months and an allowance has been added which states that the provisions of ITS SR 3.0.2 are applicable. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., the current CNP normal refueling cycle interval) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in ITS SR 3.0.2).

DISCUSSION OF CHANGES
ITS 5.5, PROGRAMS AND MANUALS

The purpose of License Conditions 2.H (Unit 1) and 2.G (Unit 2) is to ensure the leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident is reduced to as low as practicable levels. This change was evaluated in accordance with the guidance provided in NRC Generic Letter No. 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. Reviews of historical surveillance data and maintenance data sufficient to determine failure modes have shown that these tests normally pass their Surveillances at the current Frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended Surveillance Frequency will be minimal. Extending the Surveillance test interval for the System Integrity integrated leak test verification SR is acceptable because most portions of the subject systems included in this program are visually walked down, while the plant is operating, during plant testing, and/or operator/system engineer walkdowns. In addition, housekeeping/safety walkdowns also serve to detect any gross leakage. If leakage is observed from these systems, corrective actions will be taken to repair the leakage. Finally, the plant radiological surveys will also identify any potential sources of leakage. These visual walkdowns and surveys provide monitoring of the systems at a greater frequency than once per refueling cycle, and support the conclusion that the impact, if any, on safety is minimal as a result of the proposed changes. Based on the inherent system and component reliability and the testing performed during the operating cycle, the impact, if any, from this change on system availability is minimal. The review of historical surveillance data also demonstrated that there are no failures that would invalidate this conclusion. In addition, the proposed 24 month Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (30 months) does not invalidate any assumptions in the plant licensing basis. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.

L.2 *(Category 1 – Relaxation of LCO Requirements)* CTS 3.6.1.2.a specifies that the overall integrated leakage rate shall be limited to $\leq L_a$. CTS 3.6.1.2.b specifies that combined leakage rate shall be limited to $\leq 0.60\ L_a$ for all penetrations and valves subject to Types B and C tests. However, the CTS 3.6.1.2 Action does not allow the unit to increase Reactor Coolant System temperature above 200°F if either the measured overall integrated leakage rate exceeds $0.75\ L_a$ or if the measured combined leakage rate for all penetrations and valves subject to Type B and C tests exceeds $0.60\ L_a$. ITS 5.5.14 specifies that the containment leakage rate acceptance criterion is $1.0\ L_a$ and that during the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60\ L_a$ for the Type B and C tests and $\leq 0.75\ L_a$ for Type A tests. This changes the CTS by only requiring the $0.60\ L_a$ and $0.75\ L_a$ limits to be met during the first unit startup following testing in accordance with the Containment Leakage Rate Testing Program.

The purpose of ITS 5.5.14 is to ensure the appropriate limits are specified for the Containment Leakage Rate Testing Program. This change is acceptable because the acceptance limits continue to ensure the containment leakage is within the value assumed in the accident analysis. Currently, the overall integrated leakage rate of $\leq L_a$ and the combined leakage rate of $\leq 0.6\ L_a$ applies

Attachment 1, Volume 16, Rev. 0, Page 147 of 256

in MODES 1, 2, 3, and 4. The CTS 3.6.1.2 Action will not allow the unit to enter MODE 4 from MODE 5 unless the integrated leakage rate is $\leq$ 0.75 L_a and the combined leakage rate for all penetrations and valves subject to Types B and C tests is $\leq$ 0.60 L_a. In the ITS, the containment leakage rate acceptance criterion is $\leq$ 1.0 L_a and is applicable in MODES 1, 2, 3, and 4. The other limits (i.e., $\leq$ 0.60 L_a and $\leq$ 0.75 L_a) are only applicable during the first unit startup following testing in accordance with this program. This will allow subsequent unit startups (after the first unit startup following testing in accordance with the program) to proceed as long as the containment leakage rate acceptance criterion of $\leq$ 1.0 L_a is met. This is acceptable because the leakage limit of L_a is assumed in the accident analysis. This change is designated as less restrictive because less stringent LCO requirements are being applied in the ITS than were applied in the CTS.

L.3 *(Category 10 – 18 to 24 Month Surveillance Frequency Change, Non-Channel Calibration Type)* CTS 4.7.5.1.c, 4.7.5.1.e.1, 4.7.6.1.b, 4.7.6.1.d.1, 4.9.12.b, and 4.9.12.d.1 require the performance of ventilation filter testing once per 18 months. ITS 5.5.9 requires these same Surveillances to be performed once per 24 months. This changes the CTS by extending the Frequency of the Surveillance from 18 months (i.e., a maximum of 22.5 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2) to 24 months (i.e., a maximum of 30 months accounting for the allowable grace period specified in CTS 4.0.2 and ITS SR 3.0.2).

The purpose of CTS 4.7.5.1.c, 4.7.5.1.e.1, 4.7.6.1.b, 4.7.6.1.d.1, 4.9.12.b, and 4.9.12.d.1 is to ensure that the Control Room Emergency Ventilation (CREV) System, the Engineered Safety Features (ESF) Ventilation System, and the Fuel Handling Area Exhaust Ventilation (FHAEV) System charcoal adsorbers and HEPA filters can perform their safety function. This change was evaluated in accordance with the guidance provided in NRC Generic Letter No. 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991. Reviews of historical surveillance data and maintenance data sufficient to determine failure modes have shown that these tests normally pass their Surveillances at the current Frequency. An evaluation has been performed using this data, and it has been determined that the effect on safety due to the extended Surveillance Frequency will be minimal. Extending the Surveillance test interval for the HEPA filter dioctyl phthalate (DOP) tests, the charcoal adsorber halogenated hydrocarbon refrigerant tests, the laboratory analysis test, and the flow test is acceptable since other tests may be required to be performed during the operating cycle. Tests described in ITS 5.5.9.a (the HEPA filter test) and 5.5.9.b (the charcoal adsorber halogenated hydrocarbon), shall be performed once per 24 months; after each complete or partial replacement of the HEPA filter bank or charcoal adsorber bank; subsequent to reinstalling the adsorber tray used for obtaining the carbon sample, after any structural maintenance on the HEPA filter bank or charcoal adsorber bank housing; and, following painting, fire, or chemical release in any ventilation zone communicating with the subsystem while it is in operation that could adversely affect the filter bank or charcoal adsorber capability. Tests described in ITS 5.5.9.c (laboratory test of the charcoal sample) shall be performed once per 24 months; after 720 hours of adsorber operation, after any structural maintenance on the HEPA filter or charcoal adsorber bank housing;

and, following painting, fire, or chemical release in any ventilation zone communicating with the subsystem while it is in operation that could adversely affect the filter bank or charcoal adsorber capability. The additional Surveillance Frequencies are adequate to ensure the filters remain OPERABLE during the cycle. Tests described in ITS 5.5.9.d (combined pressure drop across the combined HEPA filter and charcoal adsorbers) shall be performed once per 24 months. The CREV, ESF Ventilation, and FHAEV Systems are required to be tested every 184 days for $\geq$ 15 minutes. This testing ensures that a significant portion of the associated ventilation system is operating properly and will detect significant failures. Based on the inherent system and component reliability and the testing performed during the operating cycle, the impact, if any, from this change on system availability is minimal. The review of historical surveillance data also demonstrated that there are no failures that would invalidate this conclusion. In addition, the proposed 24 month Surveillance Frequency, if performed at the maximum interval allowed by ITS SR 3.0.2 (30 months) does not invalidate any assumptions in the plant licensing basis. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.

L.4 *(Category 5 – Deletion of Surveillance Requirement)* CTS 4.7.5.1.d.2 requires the performance of a halogenated hydrocarbon refrigerant gas test on the CREV System charcoal adsorber and a DOP test on the CREV System HEPA filter banks after the reinstallation of the adsorber tray used for obtaining a carbon sample. CTS 4.7.6.1.b.4 and 4.7.6.1.c.2 require the performance of a halogenated hydrocarbon refrigerant gas test on the ESF Ventilation System charcoal adsorber after the reinstallation of the adsorber tray used for obtaining a carbon sample. CTS 4.9.12.b.4 and 4.9.12.c.2 require the performance of a halogenated hydrocarbon refrigerant gas test on the FHAEV System charcoal adsorber after the reinstallation of the adsorber tray used for obtaining a carbon sample. ITS 5.5.9 does not contain these explicit post maintenance testing requirements. This changes the CTS by deleting these explicit post maintenance requirements.

The purpose of CTS 4.7.5.1.d.2, 4.7.6.1.b.4, 4.7.6.1.c.2, 4.9.12.b.4, and 4.9.12.c.2 is to verify the OPERABILITY of the ventilation filter trains after the reinstallation of the adsorber tray used for taking a carbon sample. This change is acceptable because the deleted Surveillance Requirements are not necessary to verify the equipment used to meet the LCO can perform its required function. Thus, appropriate equipment continues to be tested in a manner and at a Frequency necessary to give confidence that the equipment can perform its assumed safety function. Any time the OPERABILITY of a system or component has been affected by repair, maintenance, modification, or replacement of a component, post maintenance testing is required to demonstrate the OPERABILITY of the system or component. This is described in the Bases for ITS SR 3.0.1 and required under ITS SR 3.0.1. The OPERABILITY requirements for the affected ventilation filter trains are described in the Bases for ITS 3.7.10, 3.7.12, and 3.7.13. In addition, the requirements of 10 CFR 50, Appendix B, Section XI (Test Control) provide adequate controls for test programs to ensure that testing incorporates applicable acceptance criteria. Compliance with 10 CFR 50, Appendix B is required under the Units 1 and 2 Operating Licenses. As a result, post maintenance testing will continue to be performed and an

explicit requirement in the Technical Specifications is not necessary. In addition, ITS 5.5.9 requires the performance of ITS 5.5.9.a (a halogenated hydrocarbon refrigerant gas test on the charcoal adsorber) and ITS 5.5.9.b (a DOP test on the HEPA filter banks) after any structural maintenance on the HEPA filter bank or charcoal adsorber bank housing. Therefore, if after the reinstallation of the adsorber tray used for obtaining a carbon sample it is determined that ITS 5.5.9.a or 5.5.9.b are not met, the applicable ITS SRs must be declared not met and the appropriate Required Actions must be entered. Therefore, although the explicit Surveillance Frequency has been deleted, both ITS SR 3.0.1 and ITS 5.5.9 will require the performance of these tests if it is determined that the Surveillances may not be satisfied after reinstallation of the adsorber trays. This change is designated as less restrictive because Surveillances which are required in the CTS will not be required in the ITS.

L.5 *(Category 7 – Relaxation Of Surveillance Frequency, Non-24 Month Type Change)* CTS 4.8.1.1.2.c.4 requires the evaluation that certain diesel fuel oil properties are within the appropriate limits within 31 days of obtaining the sample. ITS 5.5.11.b requires this same evaluation to be performed within 31 days following addition of the new fuel oil to the storage tanks. This changes the CTS by changing the time by which the evaluation for these properties must be completed.

The purpose of ITS 5.5.11.b is to ensure that the properties of the new diesel fuel oil added to the storage tanks are acceptable. This change is acceptable because the new Surveillance Frequency has been evaluated to ensure that it provides an acceptable level of equipment reliability. CTS 4.8.1.1.2.c.4 requires the evaluation that certain diesel fuel oil properties are within the appropriate limits within 31 days of obtaining the sample, while the ITS time limit begins after the fuel oil is added to the storage tanks. The new fuel oil can affect the stored fuel oil only when it is added to the storage tanks. Failure to meet the limit for these other fuel oil properties would not have an immediate effect on diesel generator operation because the oil added is normally only a small portion of the entire fuel oil storage volume. The 31 day period is also acceptable because the fuel oil properties of interest, even if they were not within stated limits, would not have an immediate effect on diesel generator operation. This change is designated as less restrictive because Surveillances will be performed less frequently under the ITS than under the CTS.

L.6 *(Category 1 – Relaxation of LCO Requirements)* Operating License Conditions 2.C.(7) (Unit 1) and 2.C.(3)(v) (Unit 2) specify that the Secondary Water Chemistry Monitoring Program shall be described in the station chemistry manual and provides a description of what the manual should contain. ITS 5.5.8 does not specify that the program must be described in the station chemistry manual. It only states what shall be included in the Secondary Water Chemistry Program. This changes the CTS by deleting the details of where the description of the Secondary Water Chemistry Program shall reside from the Technical Specifications.

The purpose of the Secondary Water Chemistry Program is to ensure proper controls are placed on monitoring secondary water chemistry in order to inhibit steam generator tube degradation. The change is acceptable because the

DISCUSSION OF CHANGES
ITS 5.5, PROGRAMS AND MANUALS

Technical Specifications still retain the requirement to have a Secondary Water Chemistry Program and the Technical Specifications continue to describe the contents of the program. Thus, the Technical Specifications continue to control the general content of the program and any changes will still require NRC approval. In addition, removal of this detail for meeting Technical Specification requirements (i.e., the actual location of the program) from the Technical Specifications is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. This change is designated as less restrictive because less stringent Technical Specifications requirements are being applied in the ITS than were applied in the CTS.

Attachment 1, Volume 16, Rev. 0, Page 151 of 256

Improved Standard Technical Specifications (ISTS) Markup and Justification for Deviations (JFDs)

CTS

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

6.8.4

The following programs shall be established, implemented, and maintained.

Definitions 1.30

5.5.1 Offsite Dose Calculation Manual (ODCM)

a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and

Definition 1.30

b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release Reports required by Specification 5.6.2 and Specification 5.6.3.

6.14.1

c. Licensee initiated changes to the ODCM:

6.14.1.a

1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:

6.14.1.a.1

a) Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s), and

6.14.1.a.2

b) A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;

6.14.1.b

2. Shall become effective after the approval of the plant manager; and

6.14.1.c

3. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

CTS

5.5 Programs and Manuals

Unit 1 License Condition 2.H, Unit 2 License Condition 2.G

5.5.2 ~~Primary Coolant Sources Outside Containment~~ Leakage Monitoring Program

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include ~~[Recirculation Spray,]~~ Safety Injection, Chemical and Volume Control, ~~gas stripper, and Hydrogen Recombiner~~ [system]. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements [and]

b. Integrated leak test requirements for each system at least once per [18] months.

The provisions of SR 3.0.2 are applicable.

5.5.3 [Post Accident Sampling

- REVIEWER'S NOTE -

This program may be eliminated based on the implementation of WCAP-14986, Rev. 1, "Post Accident Sampling System Requirements: A Technical Basis," and the associated NRC Safety Evaluation dated June 14, 2000.

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:

a. Training of personnel,

b. Procedures for sampling and analysis, and

c. Provisions for maintenance of sampling and analysis equipment.]

6.8.4.a

5.5.4 Radioactive Effluent Controls Program

6.8.4.a

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

Attachment 1, Volume 16, Rev. 0, Page 154 of 256

1

INSERT 1

Residual Heat Removal System, Containment Spray System, post accident sampling, and the boron injection tank injection flowpath of the Centrifugal Charging System

CTS

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

6.8.4.a.1) a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;

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

6.8.4.a.3) c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;

6.8.4.a.4) d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;

6.8.4.a.5) e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days;

6.8.4.a.6) f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;

6.8.4.a.7) g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the site boundary shall be in accordance with the following:

1. For noble gases: a dose rate ≤ 500 mrem/yr to the whole body and a dose rate ≤ 3000 mrem/yr to the skin; and

2. For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days: a dose rate ≤ 1500 mrem/yr to any organ;

6.8.4.a.8) h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;

CTS

5.5 Programs and Manuals

5.5.4 Radioactive Effluent Controls Program (continued)

6.8.4.a.9)

i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I, and

6.8.4.a.10)

j. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

DOC A.2

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency(ies).

6.8.1.g

5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the FSAR, Section [ ], cyclic and transient occurrences to ensure that components are maintained within the design limits.

5.5.6 [Pre-Stressed Concrete Containment Tendon Surveillance Program

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial operations. The Tendon Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with [Regulatory Guide 1.35, Revision 3, 1989].

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Tendon Surveillance Program inspection frequencies.]

4.4.10.1

5.5.7 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendations of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, August 1975.

In lieu of Position C.4.b(1) and C.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (MT and/or PT) of exposed surfaces of the removed flywheels may be conducted at approximately 10 year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI.

DOC A.13

TSTF-421 Not shown

21

INSERT 1A

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Reactor Coolant Pump Flywheel Inspection Program Surveillance Frequency.

CTS

5.5 Programs and Manuals

5.5.7 Reactor Coolant Pump Flywheel Inspection Program (continued)

- REVIEWER'S NOTES -

1. The inspection interval and scope for RCP flywheels stated above can be applied to plants that satisfy the staff requirements in the safety evaluation of Topical Report, WCAP-14535A, "Topical Report on Reactor Coolant Pump Flywheel Inspection Elimination."

2. Licensees shall confirm that the flywheels are made of SA 533 B material. Further, licensees having Group-15 flywheels (as determined in WCAP-14535A, "Topical Report on Reactor Coolant Pump Flywheel Inspection Elimination") need to demonstrate that material properties of their A516 material is equivalent to SA 533 B material, and its reference temperature, RT, is less than 30 °F.

3. For flywheels not made of SA 533 B or A516 material, licensees need to either demonstrate that the flywheel material properties are bounded by those of SA 533 B material, or provide the minimum specified ultimate tensile stress, the fracture toughness, and the reference temperature, RT_{NDT}, for that material. For the latter, the licensees should employ these material properties, and use the methodology in the topical report, as extended in the two responses to the staff's RAI, to provide an assessment to justify a change in inspection schedule for their plants.

4. Licensees with Group-10 flywheels need to confirm that their flywheels have an adequate shrink fit to preclude loss of shrink fit of the flywheel at the maximum overspeed, or to provide an evaluation demonstrating that no detrimental effects would occur if the shrink fit was lost as maximum overspeed.

5.5.8 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:

a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as follows:

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days

TSTF-421 Not shown

4.0.5

4.0.5

4.0.5.b

pumps and valves

Operation and Maintenance Standards and Guides (OM Codes)

are

OM Codes

CTS

5.5 Programs and Manuals

5.5.6 Inservice Testing Program (continued)

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

4.0.5.b

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities.

4.0.5.c

DOC A.5

c. The provisions of SR 3.0.3 are applicable to inservice testing activities.

4.0.5.e

d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS.

5.5.7 Steam Generator (SG) Tube Surveillance Program

- REVIEWER'S NOTE -

The Licensee's current licensing basis steam generator tube surveillance requirements shall be relocated from the LCO and included here. An appropriate administrative controls program format should be used.

4.4.5.1, 4.4.5.2, 4.4.5.3, 4.4.5.4, Table 4.4-1 and 4.4-2

INSERT 2

DOC A.6

The provisions of SR 3.0.2 are applicable to the SG Tube Surveillance Program test frequencies.

and SR 3.0.3

INSERT 2A

5.5.8 Secondary Water Chemistry Program

Unit 1 License Condition 2.C.(7), Unit 2 License Condition 2.C.(3)(v)

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation and low pressure turbine disc stress corrosion cracking. The program shall include:

a. Identification of a sampling schedule for the critical variables and control points for these variables;

b. Identification of the procedures used to measure the values of the critical variables;

12

INSERT 2

This program provides requirements for steam generator tube sample selection and inspection. Each steam generator shall be determined OPERABLE during shutdown by selecting and inspecting at least the minimum number of steam generators specified in Table 5.5.7-1. The steam generator tube minimum sample size, inspection result classification, and the corresponding action required shall be as specified in Table 5.5.7-2. The inservice inspection of steam generator tubes shall be performed at the Frequencies specified in Specification 5.5.7.c and the inspected tubes shall be verified acceptable per the acceptance criteria of Specification 5.5.7.d.

a. The tubes selected for each inservice inspection shall include at least 3% of the total number of tubes in all steam generators. The tubes selected for these inspections shall be selected on a random basis except:

   1. Where experience in similar plants with similar water chemistry indicates critical areas to be inspected, then at least 50% of the tubes inspected shall be from these critical areas;

   2. The first sample of tubes selected for each inservice inspection (subsequent to the preservice inspection) of each steam generator shall include:

      a) All nonplugged tubes that previously had detectable wall penetrations greater than or equal to 20%;

      b) Tubes in those areas where experience has indicated potential problems; and

      c) A tube inspection pursuant to Specification 5.5.7.d.1.h) shall be performed on each selected tube. If any selected tube does not permit the passage of the eddy current probe for a tube inspection, this shall be recorded and an adjacent tube shall be selected and subjected to a tube inspection;

   3. The tubes selected as the second and third samples (if required by Table 5.5.7-2) during each inservice inspection may be subjected to a partial tube inspection provided:

      a) The tubes selected for these samples include the tubes from those areas of the tube sheet array where tubes with imperfections were previously found; and

      b) The inspections include those portions of the tubes where imperfections were previously found.

b. The results of each sample inspection shall be classified into one of the following three categories:

12

INSERT 2 (continued)

Category	Inspection Results
C-1	Less than 5% of the total tubes inspected are degraded tubes and none of the inspected tubes are defective.
C-2	Greater than or equal to 5% and less than or equal to 10% of the total tubes inspected are degraded tubes or one or more tubes, but not more than 1% of the total tubes inspected, are defective.
C-3	More than 10% of the total tubes inspected are degraded tubes or more than 1% of the inspected tubes are defective.

Note: In all inspections, previously degraded tubes must exhibit significant (greater than or equal to 10%) further wall penetrations to be included in the above percentage calculations.

c. The above required inservice inspections of steam generator tubes shall be performed at the following Frequencies:

1. The first inservice inspection shall be performed after 6 Effective Full Power Months but within 24 calendar months of initial criticality or replacement of steam generators. Subsequent inservice inspections shall be performed at intervals of not less than 12 nor more than 24 calendar months after the previous inspection. If two consecutive inspections following service under All Volatile Treatment conditions, not including the preservice inspection, result in all inspection results falling into the C-1 category or if two consecutive inspections demonstrate that previously observed degradation has not continued and no additional degradation has occurred, the inspection Frequency may be extended to a maximum of once per 40 months.

2. If the results inservice inspection of a steam generator conducted in accordance with Table 5.5.7-2 at 40 month intervals fall in Category C-3, the inspection Frequency shall be increased to once per 20 months. The increase in inspection Frequency shall apply until a subsequent inspection satisfies the criteria of Specification 5.5.7.c.1, at which time the Frequency may be extended to a maximum of once per 40 months; and

3. Additional, unscheduled inservice inspections shall be performed on each steam generator in accordance with the first sample inspection specified in Table 5.5.7-2 during the shutdown subsequent to any of the following conditions:

   a) Primary-to-secondary tube leaks (not including leaks originating from tube-to-tube sheet welds) in excess of the limits of LCO 3.4.13;

Attachment 1, Volume 16, Rev. 0, Page 162 of 256

12

INSERT 2 (continued)

b) A seismic occurrence greater than the Operating Basis Earthquake;

c) A loss of coolant accident requiring actuation of the engineered safety features; or

d) A main steam line or feedwater line break.

d. Acceptance Criteria

1. As used in this Specification:

a) Imperfection means an exception to the dimensions, finish, or contour of a tube from that required by fabrication drawings or specifications. Eddy-current testing indications below 20% of the nominal tube wall thickness, if detectable, may be considered as imperfections;

b) Degradation means a service-induced cracking, wastage, wear, or general corrosion occurring on either inside or outside of a tube;

c) Degraded Tube means an imperfection greater than or equal to 20% of the nominal wall thickness caused by degradation:

d) Percent Degradation means the percentage of the tube wall thickness affected or removed by degradation;

e) Defect means an imperfection of such severity that it exceeds the plugging limit. A tube containing a defect is defective;

f) Plugging Limit means the imperfection depth at or beyond which the tube shall be removed from service. Any tube which, upon inspection, exhibits tube wall degradation of 40% or more of the nominal tube wall thickness shall be plugged prior to returning the steam generator to service;

g) Unserviceable describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of an Operating Basis Earthquake, a loss of coolant accident, or a main steam line or feedwater line break, as specified in Specification 5.5.7.c.3 above;

h) Tube Inspection means an inspection of the steam generator tube from the point of entry (hot leg side) completely around the U-bend to the top support to the cold leg; and

i) Preservice Inspection means an inspection of the full length of each tube in the steam generator performed by eddy current techniques prior to service to establish a baseline condition of the tubing. This inspection shall be performed after the field hydrostatic test and prior to initial entry into MODE 1 using the equipment and techniques expected to be used during subsequent inservice inspections.

Insert Page 5.5-6c

12

INSERT 2 (continued)

2. The steam generator shall be determined OPERABLE after completing the corresponding actions (plugging all tubes exceeding the plugging limit and all tubes containing through-wall cracks) required by Table 5.5.7-2.

Insert Page 5.5-6d

12

INSERT 2A

Table 5.5.7-1 (page 1 of 1)
Minimum Number of Steam Generators to be Inspected During Inservice Inspection

Preservice Inspection	Yes
Number of Steam Generators per Unit	4
First Inservice Inspection	2
Second and Subsequent Inservice Inspections	1[(a)]

(a) The third and fourth steam generators not inspected during the first inservice inspection shall be inspected during the second and third inspections, respectively. The fourth and subsequent inspections may be limited to one steam generator on a rotating schedule encompassing 3 N% of the tubes (where N is the number of steam generators in the plant) if the results of the first or previous inspections indicate that all steam generators are performing in a like manner. Note that under some circumstances, the operating conditions in one or more steam generators may be found to be more severe than those in other steam generators. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

.

12

INSERT 2A (continued)

Table 5.5.7-2 (page 1 of 1)
Steam Generator (SG) Tube Inspection

First Sample Inspection			Second Sample Inspection		Third Sample Inspection	
Sample Size	Result	Action Required	Result	Action Required	Result	Action Required
A minimum of S tubes per SG	C-1	None	NA	NA	NA	NA
	C-2	Plug defective tubes and inspect additional 2S tubes in this SG	C-1	None	NA	NA
			C-2	Plug defective tubes and inspect additional 4S tubes in this SG	C-1	None
					C-2	Plug defective tubes
					C-3	Perform action for C-3 result of first sample
			C-3	Perform action for C-3 result of first sample	NA	NA
	C-3	Inspect all tubes in this SG, plug defective tubes, inspect 2S tubes in each other SG, and notify NRC pursuant to Specification 5.6.7	All other SGs are C-1	None	NA	NA
			Some SGs are C-2, but no additional SGs are C-3	Perform action for C-2 result for second sample	NA	NA
			Additional SG is C-3	Inspect all tubes in each SG, plug or repair defective tubes, and notify NRC pursuant to Specification 5.6.7	NA	NA

Where: S = 3 (N/n)%;
N is the number of SGs in the unit; and
n is the number of SGs inspected during an inspection.

Insert Page 5.5-6f

CTS

5.5 Programs and Manuals

Unit 1 License Condition 2.C.(7), Unit 2 License Condition 2.C.(3)(v)

5.5.10 Secondary Water Chemistry Program (continued)

c. Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in leakage;

d. Procedures for the recording and management of data;

e. Procedures defining corrective actions for all off control point chemistry conditions; and

f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.

5.5.11 Ventilation Filter Testing Program (VFTP)

4.7.5.1.c,d,e,f,g; 4.7.6.1.b,c,d,e,f; 4.9.12.b,c,d,e,f; DOC A.9

The VFTP

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in [Regulatory Guide], and in accordance with Regulatory Guide 1.52, Revision 2, ASME N510-1989, and AG-1:

INSERT 3

INSERT 3A

a. Demonstrate for each of the ESF systems that an inplace test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < [0.05]% when tested in accordance with Regulatory Guide 1.52, Revision 2 and ASME N510-1989 at the system flowrate specified below ±10%;

the standard and

4.7.5.1.c.2, 4.7.5.1.c.4, 4.7.5.1.f; 4.7.6.1.b.3, 4.7.6.1.b.5, 4.7.6.1.e; 4.9.12.b.3, 4.9.12.b.5, 4.9.12.e

ESF Ventilation System	Flowrate
[ ]	[ ]

INSERT 4

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < [0.05]% when tested in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1989 at the system flowrate specified below ±10%;

INSERT 4A

the standard and

4.7.5.1.c.1, 4.7.5.1.c.4, 4.7.5.1.g; 4.7.6.1.b.2, 4.7.6.1.b.5, 4.7.6.1.f; 4.9.12.b.2, 4.9.12.b.5, 4.9.12.f

ESF Ventilation System	Flowrate
[ ]	[ ]

INSERT 5

c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in [Regulatory Guide 1.52, Revision 2], shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C (86 °F) and the relative humidity specified below:

4.7.5.1.c.3, 4.7.5.1.d; 4.7.6.1.b.4, 4.7.6.1.c.1; 4.9.12.b.4, 4.9.12.c

INSERT 5A

(RH)

or equal to

15

INSERT 3

Tests described in Specifications 5.5.9.a and 5.5.9.b shall be performed once per 24 months; after each complete or partial replacement of the HEPA filter bank or charcoal adsorber bank; after any structural maintenance on the HEPA filter bank or charcoal adsorber bank housing; and, following painting, fire, or chemical release in any ventilation zone communicating with the subsystem while it is in operation that could adversely affect the filter bank or charcoal adsorber capability.

Tests described in Specification 5.5.9.c shall be performed once per 24 months; after 720 hours of adsorber operation; after any structural maintenance on the HEPA filter bank or charcoal adsorber bank housing; and, following painting, fire, or chemical release in any ventilation zone communicating with the subsystem while it is in operation that could adversely affect the charcoal adsorber capability.

Tests described in Specifications 5.5.9.d shall be performed once per 24 months.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test Frequencies.

15

INSERT 3A

removal efficiency of $\geq$ 99% of the dioctyl phthalate (DOP)

15

INSERT 4

ESF Ventilation System	ANSI Standard	Flowrate (cfm)
CREV System	N510-1975	$\geq$ 5,400 and $\leq$ 6,600
ESF Ventilation System	N510-1980	$\geq$ 22,500 and $\leq$ 27,500
FHAEV System	N510-1980	$\geq$ 27,000 and $\leq$ 33,000

15

INSERT 4A

removal efficiency of $\geq$ 99% of a halogenated hydrocarbon refrigerant test gas

Attachment 1, Volume 16, Rev. 0, Page 168 of 256

15

INSERT 5

ESF Ventilation System	ANSI Standard	Flowrate (cfm)
CREV System	N510-1975	≥ 5,400 and ≤ 6,600
ESF Ventilation System	N510-1980	≥ 22,500 and ≤ 27,500
FHAEV System	N510-1980	≥ 27,000 and ≤ 33,000

1

INSERT 5A

from either at least one test canister or at least two carbon samples removed from one of the charcoal adsorbers

CTS

5.5 Programs and Manuals

5.5.(1) Ventilation Filter Testing Program (continued)

4.7.5.1.c.3, 4.7.5.1.d, 4.7.6.1.b.4, 4.7.6.1.c.1, 4.9.12.b.4, 4.9.12.c

ESF Ventilation System	Penetration	RH	Face Velocity (fps)
[ ]	[See Reviewer's Note]	[See Reviewer's Note]	[See Reviewer's Note]

INSERT 6

- REVIEWER'S NOTE -

The use of any standard other than ASTM D3803-1989 to test the charcoal sample may result in an overestimation of the capability of the charcoal to adsorb radioiodine. As a result, the ability of the charcoal filters to perform in a manner consistent with the licensing basis for the facility is indeterminate.

ASTM D 3803-1989 is a more stringent testing standard because it does not differentiate between used and new charcoal, it has a longer equilibration period performed at a temperature of 30 °C (86 °F) and a relative humidity (RH) of 95% (or 70% RH with humidity control), and it has more stringent tolerances that improve repeatability of the test.

Allowable Penetration = [(100% - Methyl Iodide Efficiency * for Charcoal Credited in Licensee's Accident Analysis) / Safety Factor]

When ASTM D3803-1989 is used with 30 °C (86 °F) and 95% RH (or 70% RH with humidity control) is used, the staff will accept the following:

Safety factor ≥ 2 for systems with or without humidity control.

Humidity control can be provided by heaters or an NRC-approved analysis that demonstrates that the air entering the charcoal will be maintained less than or equal to 70 percent RH under worst-case design-basis conditions.

If the system has a face velocity greater than 110 percent of 0.203 m/s (40 ft/min), the face velocity should be specified.

*This value should be the efficiency that was incorporated in the licensee's accident analysis which was reviewed and approved by the staff in a safety evaluation.

4.7.5.1.e.1, 4.7.6.1.d.1, 4.9.12.d.1

d. Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the value specified below when tested in accordance with [Regulatory Guide 1.52, Revision 2, and ASME N510-1989] at the system flowrate specified below (±10%).

15

INSERT 6

ESF Ventilation System	Face Velocity (fpm)	Penetration (%)	RH (%)
CREV System	NA	1	95
ESF Ventilation System	45.5	5	95
FHAEV System	46.8	5	95

In addition, the carbon samples not obtained from test canisters shall be prepared by either:

1. Emptying one entire bed from a removed adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed; or

2. Emptying a longitudinal sample from an adsorber tray, mixing the adsorbent thoroughly, and obtaining samples at least two inches in diameter and with a length equal to the thickness of the bed.

Attachment 1, Volume 16, Rev. 0, Page 171 of 256

CTS

5.5 Programs and Manuals

5.5.[ ] Ventilation Filter Testing Program (continued)

4.7.5.1.e.1, 4.7.6.1.d.1, 4.9.12.d.1

ESF Ventilation System	Delta P	Flowrate
[ ]	[ ]	[ ]

INSERT 7

[e. Demonstrate that the heaters for each of the ESF systems dissipate the value specified below [± 10%] when tested in accordance with [ASME N510-1989]

ESF Ventilation System	Wattage]
[ ]	[ ]

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

5.5.[ ] Explosive Gas and Storage Tank Radioactivity Monitoring Program

DOC A.11, 3.11.1, 3.11.2.1, 3.11.2.2

This program provides controls for potentially explosive gas mixtures contained in the [Waste Gas Holdup System], the quantity of radioactivity contained in gas storage tanks or fed into the offgas treatment system, and the quantity of radioactivity contained in unprotected outdoor liquid storage tanks[. The gaseous radioactivity quantities shall be determined following the methodology in [Branch Technical Position (BTP) ETSB 11-5, "Postulated Radioactive Release due to Waste Gas System Leak or Failure"]. The liquid radwaste quantities shall be determined in accordance with [Standard Review Plan, Section 15.7.3, "Postulated Radioactive Release due to Tank Failures"].

temporary

The program shall include:

3.11.2.1, 4.11.2.1

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

3.11.2.2, 4.11.2.2

b. A surveillance program to ensure that the quantity of radioactivity contained in each gas storage tank and fed into the offgas treatment system is less than the amount that would result in a whole body exposure of ≥ 0.5 rem to any individual in an unrestricted area, in the event of an uncontrolled release of the tanks' contents; and

3.11.1, 4.11.1

c. A surveillance program to ensure that the quantity of radioactivity contained in all outdoor liquid radwaste storage tanks that are not surrounded by liners, dikes,

temporary

Attachment 1, Volume 16, Rev. 0, Page 172 of 256

15

INSERT 7

ESF Ventilation System	Delta P (inches water gauge)	Flowrate (cfm)
CREV System	6	$\geq$ 5,400 and $\leq$ 6,600
ESF Ventilation System	6	$\geq$ 22,500 and $\leq$ 27,500
FHAEV System	6	$\geq$ 27,000 and $\leq$ 33,000

Attachment 1, Volume 16, Rev. 0, Page 173 of 256

5.5 Programs and Manuals

5.5.12 Explosive Gas and Storage Tank Radioactivity Monitoring Program (continued)

or walls capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the Liquid Radwaste Treatment System is less than the amount that would result in concentrations less than the limits of 10 CFR 20, Appendix B, Table 2, Column 2, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

5.5.13 Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:

1. An API gravity or an absolute specific gravity within limits, or a Specific Gravity within limits

2. A flash point and kinematic viscosity within limits for ASTM 2D fuel oil or Saybolt and

INSERT B

3. A clear and bright appearance with proper color;

b. Within 31 days following addition of the new fuel oil to storage tanks, verify that the properties of the new fuel oil, other than those addressed in a above, are within limits for ASTM 2D fuel oil, and Specification 5.5.14

c. Total particulate concentration of the fuel oil is ≤ 10 mg/l when tested every 31 days in accordance with ASTM D-2276, Method A-2 or A-3.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies.

16

INSERT 8

, if the gravity was not determined by comparison with the supplier's certification, a

CTS

5.5 Programs and Manuals

DOC M.2

5.5.12 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.

b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:

1. A change in the TS incorporated in the license or

2. A change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.

d. Proposed changes that meet the criteria of Specification 5.5.12.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

DOC M.2

5.5.13 Safety Function Determination Program (SFDP)

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate actions may be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6. The SFDP shall contain the following:

a. Provisions for cross train checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected;

b. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists;

c. Provisions to ensure that an inoperable supported system's Completion Time is not inappropriately extended as a result of multiple support system inoperabilities; and

CTS

DOC M.2

5.5 Programs and Manuals

5.5.[ ] Safety Function Determination Program (continued)

a. Other appropriate limitations and remedial or compensatory actions.

b. A loss of safety function exists when, assuming no concurrent single failure, and assuming no concurrent loss of offsite power, or no concurrent loss of onsite diesel generator(s), a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:

1. A required system redundant to the system(s) supported by the inoperable support system is also inoperable; or

2. A required system redundant to the system(s) in turn supported by the inoperable supported system is also inoperable; or

3. A required system redundant to the support system(s) for the supported systems (a) and (b) above is also inoperable.

INSERT 9

c. The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered. When a loss of safety function is caused by the inoperability of a single Technical Specification support system, the appropriate Conditions and Required Actions to enter are those of the support system.

DOC A.7

5.5.[ ] Containment Leakage Rate Testing Program

[OPTION A]

a. A program shall establish the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option A, as modified by approved exemptions.

b. The maximum allowable containment leakage rate, L_a, at P_a, shall be [ ]% of containment air weight per day.

c. Leakage rate acceptance criteria are:

1. Containment leakage rate acceptance criterion is $\leq$ 1.0 L_a. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are < 0.60 L_a for the Type B and C tests and < 0.75 L_a for Type A tests.

2. Air lock testing acceptance criteria are:

5

INSERT 9

described in Specifications 5.5.13.b.1 and 5.5.13.b.2

CTS

5.5 Programs and Manuals

5.5.[illegible] Containment Leakage Rate Testing Program (continued)

a) Overall air lock leakage rate is ≤[0.05 L_a] when tested at ≥ P_a.

b) For each door, leakage rate is ≤[0.01 L_a] when pressurized to [≥10 psig].

d. The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

e. Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J.

[OPTION B]

4.6.1.2, 4.6.1.3.a

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

1. [. . .] — INSERT 10

LCO 3.6.1.2.a, LCO 3.6.1.3.b

b. The calculated peak containment internal pressure for the design basis loss of coolant accident, P_a, is [45 psig]. The containment design pressure is [50 psig].

LCO 3.6.1.2.a

c. The maximum allowable containment leakage rate, L_a, at P_a, shall be 0.25% of containment air weight per day.

LCO 3.6.1.2.a, LCO 3.6.1.2.b, 3.6.1.2 Action

d. Leakage rate acceptance criteria are:

1. Containment leakage rate acceptance criterion is 1.0 L_a. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are < 0.60 L_a for the Type B and C tests and ≤ 0.75 L_a for Type A tests.

2. Air lock testing acceptance criteria are:

LCO 3.6.1.3.b

a) Overall air lock leakage rate is ≤[0.05 L_a] when tested at ≥P_a.

b) For each door, leakage rate is ≤[0.01 L_a] when pressurized to [≥10 psig].

CTS

17

INSERT 10

Unit 1 4.6.1.2 Note 2, Unit 2 4.6.1.2 Note 1

1. The Type A testing Frequency specified in NEI 94-01, Revision 0, Paragraph 9.2.3, as "at least once per 10 years based on acceptable performance history" is modified to be "at least once per 15 years based on acceptable performance history." This change applies only to the interval following the Type A test performed in October 1992 (Unit 1) and May 1992 (Unit 2).

Unit 1 4.6.1.2 Note 1

2. (Unit 1 only) A one-time exception to the requirement to perform post-modification Type A testing is allowed for the steam generators and associated piping, as components of the containment barrier. For this case, ASME Section XI leak testing will be used to verify the leak tightness of the repaired or modified portions of the containment barrier. Entry into MODES 3 and 4 following the extended outage that commenced in 1997 may be made to perform this testing.

5.5 Programs and Manuals

5.5.18 Containment Leakage Rate Testing Program (continued)

DOC A.7

e. The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

f. Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J.

[OPTION A/B Combined]

a. A program shall establish the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J. [Type A][Type B and C] test requirements are in accordance with 10 CFR 50, Appendix J, Option A, as modified by approved exemptions. [Type B and C][Type A] test requirements are in accordance with 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. The 10 CFR 50, Appendix J, Option B test requirements shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September, 1995 [,as modified by the following exemptions:

1. . . .]

b. The calculated peak containment internal pressure for the design basis loss of coolant accident, P_a, [45 psig]. The containment design pressure is [50 psig].

c. The maximum allowable containment leakage rate, L_a, at P_a, shall be [ ]% of containment air weight per day.

d. Leakage rate acceptance criteria are:

1. Containment leakage rate acceptance criterion is $\leq 1.0\ L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $< 0.60\ L_a$ for the Type B and C tests and [$< 0.75\ L_a$ for Option A Type A tests][$\leq 0.75\ L_a$ for Option B Type A tests].

2. Air lock testing acceptance criteria are:

a) Overall air lock leakage rate is $\leq$ [0.05 L_a] when tested at $\geq P_a$.

b) For each door, leakage rate is $\leq$ [0.01 L_a] when pressurized to [$\geq$ 10 psig].

5.5 Programs and Manuals

5.5.16 Containment Leakage Rate Testing Program (continued)

e. The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

f. Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J.

5.5.17 Battery Monitoring and Maintenance Program

This Program provides for battery restoration and maintenance, based on the recommendations of IEEE Standard 450-1995, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications," or of the battery manufacturer, including the following:

a. Actions to restore battery cells with float voltage < 2.13 V, and

b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the minimum established design limit.

Attachment 1, Volume 16, Rev. 0, Page 182 of 256

JUSTIFICATION FOR DEVIATIONS
ITS 5.5, PROGRAMS AND MANUALS

1. The brackets are removed and the proper plant specific information/value is provided.

2. This Specification has been renumbered to be consistent with the ITS format and for clarity.

3. These punctuation corrections have been made consistent with the Writer's Guide for the Improved Standard Technical Specifications, NEI 01-03, Section 5.1.3.

4. The bracketed ISTS 5.5.3, Post Accident Sampling, is not included in the CNP Units 1 and 2 ITS. The requirements for Post Accident Sampling have been deleted from the CTS in License Amendments 261 (Unit 1) and 244 (Unit 2) dated January 16, 2002. Subsequent programs have been renumbered, as necessary.

5. Editorial changes made for enhanced clarity or to be consistent with the Writer's Guide.

6. Changes are made (additions, deletions, and/or changes) to the ISTS which reflect the plant specific nomenclature, number, reference, system description, analysis, or licensing basis description.

7. ISTS 5.5.6 provides requirements for the Pre-Stressed Concrete Containment Tendon Surveillance Program. There is no requirement for this program in the CTS. Not including this ISTS program in the CNP Units 1 and 2 ITS is consistent with the CNP Units 1 and 2 licensing bases.

8. ISTS 5.5.7 (ITS 5.5.5) provides requirements for the Reactor Coolant Pump Flywheel Inspection Program. The allowance to perform the inspection per the recommendations of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, August 1975 has been deleted. This change is consistent with the CNP Units 1 and 2 licensing bases. The Surveillance Frequency has also been modified to be consistent with the CNP Units 1 and 2 licensing bases.

9. The Reviewer's Note has been deleted since it is not intended to be included in the ITS.

10. The Inservice Testing (IST) Program (ISTS 5.5.8) has been modified to state that the IST Program provides control for ASME Code Class 1, 2, and 3 "pumps and valves" in place of the current "components." 10 CFR 50.55a(f) provides the regulatory requirements for an IST Program. It specifies that ASME Code Class 1, 2, and 3 pumps and valves are the only components covered by an IST Program. 10 CFR 50.55a(g) provides regulatory requirements for an Inservice Inspection (ISI) Program. It specifies that ASME Code Class 1, 2, and 3 components are covered by the ISI Program, and that pumps and valves are covered by the IST Program in 10 CFR 50.55a(f). The ISTS does not include ISI Program requirements as these requirements have been relocated to a plant specific document. Therefore, the components to which the IST Program applies (i.e., pumps and valves) have been added for clarity. In addition, the statement "The program shall include the following:" has been deleted because not all of the statements that follow are really part of the program requirements. Also, in the 1987 Addenda to the 1986 edition of ASME Boiler and Pressure Vessel Code, Section XI, the requirements for Inservice

Attachment 1, Volume 16, Rev. 0, Page 183 of 256

JUSTIFICATION FOR DEVIATIONS
ITS 5.5, PROGRAMS AND MANUALS

Testing were removed and relocated to the ASME/ANSI OM Code. This change was endorsed in 10 CFR 50.55a. 10 CFR 50.55a(f) now addresses the requirements for inservice testing using the ASME/ANSI OM Code and 10 CFR 50.55a(g) addresses the requirements for inservice inspection using ASME Boiler and Pressure Vessel Code, Section XI. The ITS has been revised to incorporate the current ASME/ANSI OM Code requirements. In addition, the terms weekly, monthly, semiannually, and every 9 months are not used in the ASME/ANSI OM Code and have been deleted.

11. Typographical/grammatical error corrected.

12. ISTS 5.5.9 (ITS 5.5.7) provides the requirements for the Steam Generator (SG) Program. Consistent with the associated Reviewer's Note, the CNP Units 1 and 2 current licensing basis, reflected in CTS 4.4.5.1, 4.4.5.2, 4.4.5.3, and 4.4.5.4, for SG tube inspections are included in this program. The corresponding ISTS Reviewer's Note is deleted. The Reviewer's Note provides information for the NRC to identify acceptable methods to meet the requirements. The Reviewer's Note is not meant to be retained in the final version of the plant-specific submittal.

13. ISTS 5.5.10 (ITS 5.5.8) provides the requirements for the Secondary Water Chemistry Program. The program in the ISTS includes requirements to provide controls for monitoring secondary water chemistry to inhibit SG tube degradation and low pressure turbine disc stress corrosion. ITS 5.5.8 provides controls for monitoring secondary water chemistry only to inhibit SG tube degradation. This modification is consistent with the current requirements in License Condition 2.C.(7) (Unit 1) and 2.C.(3)(v) (Unit 2).

14. ISTS 5.5.10.c includes a requirement that the Secondary Water Chemistry Program identify process sampling points, "which shall include monitoring the discharge of the condensate pumps for evidence of condenser in leakage." ITS 5.5.8.c only includes the requirement that the Secondary Chemistry Program identify process sampling points and does not provide any explicit monitoring points. This change is consistent with current Operating Licensing Conditions 2.C.(7).3 (Unit 1) and 2.C.(3)(v)3 (Unit 2).

15. ISTS 5.5.11 (ITS 5.5.9) provides requirements for the Ventilation Filter Testing Program. ITS 5.5.9 is revised to reflect the CNP Units 1 and 2 licensing bases. The 18 month Frequencies in the CTS have been changed to 24 months in the ITS.

16. The following changes have been made to ISTS 5.5.13 (ITS 5.5.11):

    a. Specific gravity has been added as an option to API gravity or absolute specific gravity consistent with the current licensing basis;

    b. Saybolt viscosity has been added as an option to kinematic viscosity and the viscosity check is only required if the gravity was not determined by comparison with the supplier's certification, consistent with current licensing basis;

    c. The type of fuel oil, Type 2D, has been deleted consistent with current licensing basis; and

Attachment 1, Volume 16, Rev. 0, Page 184 of 256

JUSTIFICATION FOR DEVIATIONS
ITS 5.5, PROGRAMS AND MANUALS

d. The words "ASTM D-2276 Method A-2 or A-3" in ISTS 5.5.13.c (ITS 5.5.11.c) have been changed to "ASTM D-2276 Method A" in ITS 5.5.11.c to be consistent with current licensing basis.

17. ISTS 5.5.16 (ITS 5.5.14) provides requirements for the Containment Leakage Rate Testing Program. The requirements of the ISTS are revised to reflect the Containment Leakage Rate Testing Program requirements of CTS 3/4.6.1.2 and 3/4.6.1.3. The containment design pressure limit specified in ISTS 5.5.16.b was not included because it currently does not exist in the CTS, and because this limit does not provide any useful input to the Containment Leakage Rate Testing Program. The air lock door leakage test of ISTS 5.5.16.d.2.b) is not included because it is not required by the CTS. In addition, the statement in ISTS 5.5.16.f that "Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J" has been deleted because the phrase is not consistent with the allowances in ISTS 5.5.16.a (ITS 5.5.14.a), which states that the 10 CFR 50, Appendix J, Option B requirements may be modified by approved exemptions and exceptions.

18. The program details of the Explosive Gas and Storage Tank Radioactivity Monitoring Program are described in ISTS 5.5.12 (ITS 5.5.10) parts a, b, and c. Therefore, the sentence in the introductory paragraph that specifies a method to determine the explosive gas and storage tank radioactivity is not necessary .

19. Changes are made to ISTS 5.5.12.c (ITS 5.5.10.c) to be consistent with the first paragraph in ISTS 5.5.12 (ITS 5.5.10).

20. ISTS 5.5.11.d demonstrates that the pressure drop across the combined HEPA filters, prefilters, and charcoal adsorbers is less than the specified pressure drop when tested at the specified system flow rate. The referenced methods for performing the test, Regulatory Guide 1.52, Revision 2 and ASME N510-1989, do not provide the methods for performing this test. As a result, these test method references have been deleted in ITS 5.5.9.d.

21. The requirement of ISTS 5.5.7 (ITS 5.5.5) is currently located in an individual Specification in the CTS (CTS 4.4.10.1). Thus, CTS 4.0.2 (ITS SR 3.0.2) and CTS 4.0.3 (ITS SR 3.0.3) apply to the CTS Surveillance Frequency. To maintain consistency with the current licensing basis requirements, an allowance that ITS SR 3.0.2 and SR 3.0.3 are applicable to the Reactor Coolant Pump Flywheel Inspection Program Surveillance Frequency has been included in ITS 5.5.5. In addition, approved TSTF-421, which extends the Frequency to 20 years has not been adopted.

Attachment 1, Volume 16, Rev. 0, Page 185 of 256

Specific No Significant Hazards Considerations (NSHCs)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 5.5, PROGRAMS AND MANUALS

There are no specific NSHC discussions for this Specification.

Attachment 1, Volume 16, Rev. 0, Page 187 of 256

ATTACHMENT 6

ITS 5.6, Reporting Requirements

Current Technical Specification (CTS) Markup and Discussion of Changes (DOCs)

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

5.6 6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

5.6 6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator unless otherwise noted.

in accordance with 10 CFR 50.4

A.2

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

L.1

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

6.9 STARTUP REPORT (Continued)

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

L.1

ANNUAL REPORTS[1]

by April 30 (for Occupational Radiation Exposure Report)

L.2

5.6.1, 5.6.7

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

A.3

6.9.1.5 Reports required on an annual basis shall include:

5.6.1

a. A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving annual exposures greater than 100 mrem according to work and job functions[2], e.g., reactor operations and surveillance, in-service inspection, routine maintenance, special maintenance (describe maintenance), waste processing and refueling. Also included is a tabulation of the total person rem exposures for station, utility, and other personnel associated with each work and job function. The dose assignment to various duty functions may be estimates based on pocket dosimeter, electronic dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose received shall be assigned to specific major work functions.

5.6.7

b. The complete results of steam generator tube in-service inspections performed during the report period (reference Specification 4.4.5.5.b).

c. Documentation of all challenges to the pressurizer power operated relief valves (PORVs) or safety valves.

L.3

d. Information regarding any instances when the I-131 specific activity limit was exceeded.

L.4

5.6.1 Note [1] A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

5.6.1 [2] This tabulation supplements the requirements of 20.2206 of 10 CFR Part 20.

ITS 5.6

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT[3]

by May 15 — L.2

5.6.2 6.9.1.6 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

INSERT 1 — M.1

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT[3] — A.1

5.6.3 6.9.1.7 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months of operation shall be submitted within 90 days after January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

5.6.2 Note, 5.6.3 Note

[3] A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material for each unit. — A.9

Attachment 1, Volume 16, Rev. 0, Page 192 of 256

ITS

M.1

INSERT 1

5.6.2 The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

Insert Page 6-11

Attachment 1, Volume 16, Rev. 0, Page 193 of 256

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

MONTHLY REACTOR OPERATING REPORT

5.6.4 6.9.1.8 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission (Attn: Document Control Desk), Washington, D.C. 20555, with a copy to the Regional Office no later than the 15th of each month following the calendar month covered by the report.

L.3

A.4

5.6.5 CORE OPERATING LIMITS REPORT

5.6.5.a 6.9.1.9.1 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following:

A.5

Reactor Core Safety Limits; SHUTDOWN MARGIN;

a. Moderator Temperature Coefficient Limits for Specification 3/4.1.1.4,

b. Rod Drop Time Limits for Specification 3/4.1.3.3,

c. Shutdown Rod Insertion Limits for Specification 3/4.1.3.4,

RTS Instrumentation Overpressure ΔT and Overpower ΔT Allowable Value parameter values; RCS Pressure, Temperature, and Flow DNB Limits; and Boron Concentration.

d. Control Rod Insertion Limits for Specification 3/4.1.3.5,

e. Axial Flux Difference for Specification 3/4.2.1,

f. Heat Flux Hot Channel Factor for Specification 3/4.2.2,

g. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3/4.2.3, and

h. Allowable Power Level for Specification 3/4.2.6.

A.6

5.6.5.b 6.9.1.9.2 The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:

a. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985 (Westinghouse Proprietary),

b. WCAP-8385, "Power Distribution Control and Load Following Procedures - Topical Report," September 1974 (Westinghouse Proprietary),

c. WCAP-10216-P-A, Revision 1A, "Relaxation of Constant Axial Offset Control/F_Q Surveillance Technical Specification," February 1994 (Westinghouse Proprietary),

d. WCAP-10266-P-A Rev. 2, "The 1981 Version of Westinghouse Evaluation Mode Using BASH Code," March 1987 (Westinghouse Proprietary).

e. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Reference Core Report," July 1991 (Westinghouse Proprietary).

LA.1

ITS 5.6

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

CORE OPERATING LIMITS REPORT (Continued)

5.6.5.c

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

5.6.5.d

6.9.1.9.4 The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC document control desk with copies to the Regional Administrator and Resident Inspector.

A.4

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the attention of the document control desk - U.S. Nuclear Regulatory Commission (Washington, D.C. 20555), with copies to the Region III Administrator and the Resident Inspector at the Cook Nuclear Plant within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

a. Inoperable Seismic Monitoring Instrumentation, Specification 3.3.3.3.

b. Seismic Monitoring Instrumentation Actuated, Specification 4.3.3.3.2.

c. Inoperable Meteorological Monitoring Instrumentation, Specification 3.3.3.4.

d. High Specific Activity in RCS Coolant, Specification 3.4.8.

e. RCS Pressure Transient Mitigated By RHR Safety Valve or RCS Vent(s), Specification 3.4.9.3.

f. Moderator Temperature Coefficient, Specification 3.1.1.4.

g. Sealed Source Leakage in Excess of Limits, Specification 4.7.7.1.3.

h. ECCS Actuation, Specifications 3.5.2 and 3.5.3.

i. Violation of Safety Limit, Specification 6.7.1.

A.7

6.10 DELETED

Attachment 1, Volume 16, Rev. 0, Page 195 of 256

ITS 5.6

A.1

ITS

TABLE 3.3-6 (Continued)
TABLE NOTATION

ACTION 20 - With the number of channels OPERABLE less than required by the Minimum Channels Operable requirement, comply with the ACTION requirements of Specification 3.4.6.1.

See ITS 3.4.15

ACTION 21 - With the number of channels OPERABLE less than required by the Minimum Channels Operable requirement, perform area surveys of the monitored area with portable monitoring instrumentation at least once per day.

See CTS 3/4.3.3.1

ACTION 22 - With the number of channels OPERABLE less than required by the Minimum Channels Operable requirements, comply with the ACTION requirements of Specification 3.9.9. This ACTION is not required during the performance of containment integrated leak rate test.

See ITS 3.3.6

ACTION 22A- With the number of OPERABLE Channels less than required by the Minimum Channels OPERABLE requirements:

1. either restore the inoperable Channel(s) to OPERABLE status within 7 days of the event, or

See ITS 3.3.3

2. prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

5.6.6

3. Technical Specification Sections 3.0.3 and 3.0.4 Not Applicable.

See ITS 3.3.3

ACTION 22B- With the number of OPERABLE Channels less than required by the Minimum Channels OPERABLE requirements.

1. either restore the inoperable Channel(s) to OPERABLE status within 7 days of the event, or

2. prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

See CTS 3/4.3.3.1

3. In the event of an accident involving radiological releases initiate the preplanned alternate method of monitoring the appropriate parameter(s) within 72 hours.

4. Technical Specification Sections 3.0.3 and 3.0.4 Not Applicable.

ITS 5.6

A.1

ITS

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS
3/4.4 REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS (continued)

5.6.7

4.4.5.5 Reports

a. Following each inservice inspection of steam generator tubes, the number of tubes plugged in each steam generator shall be reported to the Commission within 15 days.

b. The complete results of the steam generator tube inservice inspection shall be included in the Annual Operating Report for the period in which this inspection was completed. This report shall include:

A.8

1. Number and extent of tubes inspected.

2. Location and percent of wall-thickness penetration for each indication of an imperfection.

3. Identification of tubes plugged.

c. Results of steam generator tube inspections which fall into Category C-3 and require prompt notification of the Commission shall be reported pursuant to Specification 6.9.1 prior to resumption of plant operation. The written followup of this report shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence.

A.10

Attachment 1, Volume 16, Rev. 0, Page 197 of 256

ITS 5.6

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

5.6 6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

5.6 6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator unless otherwise noted in accordance with 10 CFR 50.4 A.2

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

L.1

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Attachment 1, Volume 16, Rev. 0, Page 198 of 256

ITS 5.6

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

STARTUP REPORT (Continued)

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

L.1

ANNUAL REPORTS[1]

by April 30 (for Occupational Radiation Exposure Report)

L.2

5.6.1, 5.6.7

6.9.1.4 Annual reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. The initial report shall be submitted prior to March 1 of the year following initial criticality.

A.3

6.9.1.5 Reports required on an annual basis shall include:

5.6.1

a. A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving annual exposures greater than 100 mrem according to work and job functions[2], e.g., reactor operations and surveillance, in-service inspection, routine maintenance, special maintenance (describe maintenance), waste processing and refueling. Also included is a tabulation of the total person rem exposures for station, utility, and other personnel associated with each work and job function. The dose assignment to various duty functions may be estimates based on pocket dosimeter, electronic dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose received shall be assigned to specific major work functions.

5.6.7

b. The complete results of steam generator tube in-service inspections performed during the report period (reference Specification 4.4.5.5.b).

c. Documentation of all challenges to the pressurizer power operated relief valves (PORVs) or safety valves.

L.3

d. Information regarding any instances when the I-131 specific activity limit was exceeded.

L.4

5.6.1 Note

[1] A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

5.6.1

[2] This tabulation supplements the requirements of 20.2206 of 10 CFR Part 20.

Attachment 1, Volume 16, Rev. 0, Page 199 of 256

ITS 5.6

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT[3]

by May 15 — L.2

5.6.2 6.9.1.6 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

INSERT 1 — M.1

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT[3]

A.1

5.6.3 6.9.1.7 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous 12 months of operation shall be submitted within 90 days after January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

5.6.2 Note, 5.6.3 Note

[3] A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material for each unit.

A.9

Attachment 1, Volume 16, Rev. 0, Page 200 of 256

ITS

M.1

INSERT 1

5.6.2 The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

MONTHLY REACTOR OPERATING REPORT

5.6.4 6.9.1.8 Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the U.S. Nuclear Regulatory Commission (Attn: Document Control Desk), Washington, D.C. 20555, with a copy to the Regional Office no later than the 15th of each month following the calendar month covered by the report.

L.3

A.4

5.6.5 CORE OPERATING LIMITS REPORT

5.6.5.a 6.9.1.9.1 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle for the following:

Reactor Core Safety Limits; SHUTDOWN MARGIN;

a. Moderator Temperature Coefficient Limits for Specification 3/4.1.1.4,

b. Rod Drop Time Limits for Specification 3/4.1.3.4,

c. Shutdown Rod Insertion Limits for Specification 3/4.1.3.5,

d. Control Rod Insertion Limits for Specification 3/4.1.3.6,

e. Axial Flux Difference for Specification 3/4.2.1,

f. Heat Flux Hot Channel Factor for Specification 3/4.2.2,

g. Nuclear Enthalpy Rise Hot Channel Factor for Specification 3/4.2.3, and

h. Allowable Power Level for Specification 3/4.2.6.

RTS Instrumentation Overpressure ΔT and Overpower ΔT Allowable Value parameter values; RCS Pressure, Temperature, and Flow DNB Limits; and Boron Concentration.

A.5

A.6

5.6.5.b 6.9.1.9.2 The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC in:

a. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985 (Westinghouse Proprietary),

b. WCAP-8385, "Power Distribution Control and Load Following Procedures - Topical Report," September 1974 (Westinghouse Proprietary),

c. WCAP-10216-P-A, Revision 1A, "Relaxation of Constant Axial Offset Control/F_Q Surveillance Technical Specification," February 1994 (Westinghouse Proprietary),

d. WCAP-10266-P-A Rev. 2, "The 1981 Version of Westinghouse Evaluation Mode Using BASH Code," March 1987 (Westinghouse Proprietary).

e. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Reference Core Report," July 1991 (Westinghouse Proprietary).

LA.1

ITS 5.6

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

CORE OPERATING LIMITS REPORT (Continued)

5.6.5.c 6.9.1.9.3 The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met.

5.6.5.d 6.9.1.9.4 The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC document control desk with copies to the Regional Administrator and Resident Inspector.

A.4

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the attention of the document control desk - U.S. Nuclear Regulatory Commission (Washington, D.C. 20555), with copies to the Region III Administrator and the Resident Inspector at the Cook Nuclear Plant within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

a. Inoperable Seismic Monitoring Instrumentation, Specification 3.3.3.3.

b. Seismic Monitoring Instrumentation Actuated, Specification 4.3.3.3.2.

c. Inoperable Meteorological Monitoring Instrumentation, Specification 3.3.3.4.

d. High Specific Activity in RCS Coolant, Specification 3.4.8.

e. RCS Pressure Transient Mitigated By RHR Safety Valve or RCS Vent(s), Specification 3.4.9.3.

f. Moderator Temperature Coefficient, Specification 3.1.1.4.

g. Sealed Source Leakage in Excess of Limits, Specification 4.7.7.1.3.

h. ECCS Actuation, Specifications 3.5.2 and 3.5.3.

i. Violation of Safety Limit, Specification 6.7.1.

A.7

6.10 DELETED

ITS 5.6

A.1

ITS

TABLE 3.3-6 (Continued)

TABLE NOTATION

ACTION 20 - With the number of channels OPERABLE less than required by the Minimum Channels Operable requirement, comply with the ACTION requirements of Specification 3.4.6.1.

See ITS 3.4.15

ACTION 21 - With the number of channels OPERABLE less than required by the Minimum Channels Operable requirement, perform area surveys of the monitored area with portable monitoring instrumentation at least once per day.

See CTS 3/4.3.3.1

ACTION 22 - With the number of channels OPERABLE less than required by the Minimum Channels Operable requirement, comply with the ACTION requirements of Specification 3.9.9. This ACTION is not required during the performance of containment integrated leak rate test.

See ITS 3.3.6

ACTION 22A- With the number of OPERABLE Channels less than required by the Minimum Channels OPERABLE requirements:

1. either restore the inoperable Channel(s) to OPERABLE status within 7 days of the event, or

See ITS 3.3.3

2. prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

5.6.6

3. Technical Specification Sections 3.0.3 and 3.0.4 Not Applicable.

See ITS 3.3.3

ACTION 22B- With the number of OPERABLE Channels less than required by the Minimum Channels OPERABLE requirements.

1. either restore the inoperable Channel(s) to OPERABLE status within 7 days of the event, or

2. prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 14 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

See CTS 3/4.3.3.1

3. In the event of an accident involving radiological releases initiate the preplanned alternate method of monitoring the appropriate parameter(s) within 72 hours.

4. Technical Specification Sections 3.0.3 and 3.0.4 Not Applicable.

ITS 5.6

A.1

ITS

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

9. Preservice Inspection means an inspection of the full length of each tube in each steam generator performed by eddy current techniques prior to service establish a baseline condition of the tubing. This inspection shall be performed after the field hydrostatic test and prior to initial POWER OPERATION using the equipment and techniques expected to be used during subsequent inservice inspections.

See ITS 5.5

b. The steam generator shall be determined OPERABLE after completing the corresponding actions (plug all tubes exceeding the plugging limit and all tubes containing through-wall cracks) required by Table 4.4-2.

5.6.7

4.4.5.5 Reports

a. Following each inservice inspection of steam generator tubes, the number of tubes plugged in each steam generator shall be reported to the Commission within 15 days.

A.8

b. The complete results of the steam generator tube inservice inspection shall be included in the Annual Operating Report for the period in which this inspection was completed. This report shall include:

1. Number and extent of tubes inspected.

2. Location and percent of wall-thickness penetration for each indication of an imperfection.

3. Identification of tubes plugged.

c. Results of steam generator tube inspections which fall into Category C-3 and require prompt notification of the Commission shall be reported pursuant to Specification 6.9.1 prior to resumption of plant operation. The written followup of this report shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence.

A.10

D.C. COOK - UNIT 2 3/4 4-11

Attachment 1, Volume 16, Rev. 0, Page 205 of 256

DISCUSSION OF CHANGES
ITS 5.6, REPORTING REQUIREMENTS

ADMINISTRATIVE CHANGES

A.1 In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.

A.2 CTS 6.9.1 requires, in addition to the requirements of 10 CFR, reports be submitted to the Regional Administrator. ITS 5.6 requires that the reports be submitted in accordance with 10 CFR 50.4. This changes the CTS by removing the explicit requirement to send reports to the Regional Administrator.

10 CFR 50.4 provides distribution requirements for written communications to the NRC. This change is acceptable because the requirements deleted from the Technical Specifications are already required by 10 CFR 50.4. This change is designated as administrative because it does not result in technical changes to the CTS.

A.3 CTS 6.9.1.4 regarding annual reports requires the initial report to be submitted prior to March 1 of the year following initial criticality. The ITS does not include such a statement. This changes the CTS by deleting a requirement for report submissions that have already occurred and will not be repeated.

This change is acceptable because the one time reporting requirement has already been met and no longer needs to be specified. This change is designated as administrative because it does not result in technical changes to the CTS.

A.4 CTS 6.9.1.8 requires the Monthly Reactor Operating Report be submitted to the U.S. Nuclear Regulatory Commission with a copy to the Regional Office. CTS 6.9.1.9.4 requires the CORE OPERATING LIMITS REPORT (COLR) to be provided to the NRC document control desk with copies to the Regional Administrator and Resident Inspector. ITS 5.6.4 requires the Monthly Operating Report to be submitted and ITS 5.6.5.d requires the COLR to be provided to the NRC. This changes the CTS by removing the specifics regarding distribution of the reports to the NRC.

10 CFR 50.4 provides distribution requirements for written communications to the NRC. This change is acceptable because the requirements deleted from the Technical Specifications are already required by 10 CFR 50.4. This change is designated as administrative because it does not result in technical changes to the CTS.

A.5 CTS 6.9.1.9.1 requires, in part, that core operating limits be established and documented in the COLR for the rod drop time limits in CTS 3/4.1.3.3. ITS 5.6.5.a does not include a reference to rod drop time limits. This changes

Attachment 1, Volume 16, Rev. 0, Page 206 of 256

the CTS eliminating the reference to rod drop time limits being core operating limits that are included in the COLR.

Rod drop time limits are included in the CTS and the ITS, not the COLR. The information that CTS 3/4.1.3.3 is referring to in the COLR is the definition of what constitutes the full withdrawn position for the purposes of performing the rod drop time Surveillance. This information is not a core operating limit and is therefore not included in the list of individual Specifications that address core operating limits in ITS 5.6.5. This change is acceptable because the information that was moved to the COLR and is referenced in CTS 3/4.1.3.3 (i.e., what constitutes the full withdrawn position) remains in the COLR. This change is designated as administrative because it does not result in technical changes to the CTS.

A.6 CTS 6.9.1.9.1 contains a list of the core operating limits established and documented in the COLR. ITS 5.6.5.a includes additional core operating limits established and documented in the COLR. These are Reactor Core Safety Limits; SHUTDOWN MARGIN; Reactor Trip System Instrumentation Functions 6 and 7 (Overtemperature ΔT and Overpressure ΔT; respectively) Allowable Value parameter values; RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling Limits; and Boron Concentration. These limits had previously been addressed in other parts of the CTS, but are being moved to the COLR in the ITS, and because of this are listed in ITS 5.6.5.a. This changes the CTS by adding core operating limits established and documented in the COLR because they are being moved there as part of changes to other parts of the CTS. Technical aspects of the changes are addressed in the Discussion of Changes for the respective individual ITS Specifications.

This change is acceptable because it administratively documents changes made to other parts of the CTS and the COLR. This change is designated as administrative because it does not result in technical changes to the CTS.

A.7 CTS 6.9.2 requires special reports be submitted to the NRC and lists the CTS Specifications that require special reports to be submitted. The ITS does not require these special reports to be prepared and submitted. This changes the CTS by deleting the references to the CTS Specifications requiring special reports. Justification for disposition of each of the special report requirements is addressed by the Discussion of Changes for the respective ITS or CTS Specification.

The purpose of CTS 6.9.2 is to identify the Specifications that require special reports to be submitted. This change is acceptable because the special reports are no longer required by the respective Specifications. Justification for disposition of each of the special report requirements is addressed by the Discussion of Changes for the respective ITS or CTS Specification. This change is designated as administrative because it does not result in technical changes to the CTS.

A.8 CTS 4.4.5.5.b requires the complete results of the steam generator tube inservice inspection to be included in the Annual Operating Report. ITS 5.6.7 requires these same results to be submitted on an annual basis (i.e., prior to March 1 for the inspection that was completed in the previous calendar year).

DISCUSSION OF CHANGES
ITS 5.6, REPORTING REQUIREMENTS

This changes the CTS by eliminating the requirement to include the steam generator tube inservice inspection results in the Annual Operating Report.

The purpose of CTS 4.4.5.5.b is to ensure the results of the steam generator tube inservice inspection are provided to the NRC. It is not necessary to specify the report that will include the results. This change is acceptable because the steam generator tube inservice inspection results will still be required to be provided to the NRC at the same Frequency as in the CTS. This change is designated as administrative because it does not result in technical changes to the CTS.

A.9 CTS 6.9.1.6 and 6.9.1.7 Footnote 3 states that, for these reports, the submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material for each unit. ITS 5.6.2 and 5.6.3 does not include the portion of the statement concerning units with separate radwaste systems. This changes the CTS by deleting the reference to units with separate radwaste systems.

This change is acceptable because CNP Units 1 and 2 share a radwaste system; they do not have separate radwaste systems. This change is designated as administrative because it does not result in technical changes to the CTS.

A.10 CTS 4.4.5.5.c requires a prompt notification to the NRC pursuant to CTS 6.9.1 prior to resumption of plant operation and a followup written report if the results of the steam generator tube inspection fall into the Category C-3. ITS 5.6.7.c requires Category C-3 results to be reported to the NRC in accordance with 10 CFR 50.72 and a Licensee Event Report to be submitted in accordance with 10 CFR 50.73. This changes the CTS by explicitly referencing the applicable Regulations that require the report.

The purpose of CTS 4.4.5.5.c is to ensure NRC prompt notification and followup written reporting if an inspection result falls into Category C-3. 10 CFR 50.72 governs prompt phone notifications and 10 CFR 50.73 governs written reports. These changes are acceptable because they are consistent with the current manner in which the CTS 4.4.5.5.c notification and reporting are performed. This change is designated as administrative because it does not result in technical changes to the CTS.

MORE RESTRICTIVE CHANGES

M.1 The second paragraph of ITS 5.6.2 includes details required to be included in the Annual Radiological Environmental Operating Report. CTS 6.9.1.6 does not contain this level of detail. This changes the CTS by requiring additional detail to be included in the Annual Radiological Environmental Operating Report.

The purpose of the second paragraph of ITS 5.6.2 is to specify details to be included in the Annual Radiological Environmental Operating Report. This change is acceptable because the content requirements are consistent with the objectives outlined in the Offsite Dose Calculation Manual. This change is

Attachment 1, Volume 16, Rev. 0, Page 208 of 256

designated more restrictive because it adds new reporting requirements to the Technical Specifications.

RELOCATED SPECIFICATIONS

None

REMOVED DETAIL CHANGES

LA.1 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements)* CTS 6.9.1.9.2 specifies the revision numbers and dates of the referenced methodologies used for the development of the COLR. ITS 5.6.5.b does not contain this level of detail. This changes the CTS by moving the specific methodology references for revisions and dates to the COLR.

The removal of these details, which are related to meeting Technical Specifications requirements, from the Technical Specifications is acceptable because this type of information is not necessary to be included in Technical Specifications to provide adequate protection of public health and safety. The ITS still retains the references for the COLR and only NRC-approved methodologies may be used. The methodologies used to develop the parameters in the COLR have obtained prior approval by the NRC in accordance with Generic Letter 88-16. Also, this change is acceptable because the removed information will be adequately controlled in the COLR under the requirements provided in ITS 5.6.5, "CORE OPERATING LIMITS REPORT". ITS 5.6.5 ensures that the applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems limits, and nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analyses are met and that only NRC-approved methodologies are used. This change is designated as a less restrictive removal of detail change because information relating to the methodology used to develop cycle-specific parameter limits is being removed from the Technical Specifications.

LESS RESTRICTIVE CHANGES

L.1 *(Category 8 – Deletion of Reporting Requirements)* CTS 6.9.1.1, CTS 6.9.1.2, and CTS 6.9.1.3 contain requirements for submitting a report of plant startup and power escalation testing following receipt of an operating license; amendments to the license involving planned increase in power level; installation of fuel that has a different design or has been manufactured by a different fuel supplier; and modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit. The ITS does not contain such reporting requirements. This changes the CTS by deleting the requirements of CTS 6.9.1.1, CTS 6.9.1.2, and CTS 6.9.1.3.

The purpose of CTS 6.9.1.1, CTS 6.9.1.2 and CTS 6.9.1.3, is to provide a summary of plant startup and power escalation testing following the four specified conditions as verification that the unit operated as expected. This change is acceptable because the regulations provide adequate reporting requirements. If

there were any unit conditions outside the expected parameters during unit startup, they would be reported to the NRC if they met the reporting requirements in the regulations. Otherwise, the reports would document that the unit operated as expected and already approved by the NRC, as required by regulations. This change is designated as less restrictive because reports that would be submitted under the CTS will not be required under the ITS.

L.2 *(Category 1 – Relaxation of LCO Requirements)* CTS 6.9.1.4 requires annual reports described in CTS 6.9.1.5, which include the Occupational Radiation Exposure Report, to be submitted prior to March 1 of each year. CTS 6.9.1.6 requires the Annual Radiological Environmental Operating Report to be submitted before May 1 of each year. ITS 5.6.1 requires the Occupational Radiation Exposure Report to be submitted by April 30 of each year. ITS 5.6.2 requires the Annual Radiological Environmental Operating Report to be submitted by May 15 of each year. This changes the CTS by allowing an additional time to submit these reports each year.

The purpose of the due date for submitting the Occupational Radiation Exposure Report and Annual Radiological Environmental Operating Report is to ensure that the reports are provided in a reasonable period of time to the NRC for review. This change is acceptable because the reports are still required to be submitted in a reasonable time frame. Given that the reports are still required to be provided to the NRC on or before April 30 or May 15, respectively, and cover the previous calendar year, report completion and submittal is clearly not necessary to assure operation in a safe manner for the interval between March 1 and April 30, and May 1 and May 15, respectively. Additionally, there is no requirement for the NRC to approve the reports. This change is designated as less restrictive because it allows more time to prepare and submit the reports to the NRC.

L.3 *(Category 8 – Deletion of Reporting Requirements)* CTS 6.9.1.5.c and 6.9.1.8 require annual and monthly reporting of all challenges to the Reactor Coolant System pressurizer operated relief valves (PORVs) or safety valves. ITS 5.6 does not include these reporting requirements. This changes the CTS by deleting the requirement to include documentation of all challenges to the Reactor Coolant System PORVs or safety valves in the annual and monthly reports.

The purpose of the annual and monthly reporting requirements is to ensure the NRC receives appropriate routine reports of operating statistics and shutdown experience. This change is acceptable because the regulations provide adequate details of reporting requirements, and the reporting of these challenges does not affect continued plant operation. The change deletes the requirement to include documentation of all challenges to the Reactor Coolant System PORVs or safety valves in the annual and monthly reports. This change is designated as less restrictive because reports that would be submitted under the CTS will not be required under the ITS.

L.4 *(Category 8 – Deletion of Reporting Requirements)* CTS 6.9.1.5.d requires annual reporting of information regarding any instances when the I-131 specific activity limit for the primary coolant is exceeded. ITS 5.6 does not contain any

requirements for such a report. This changes the CTS by not including the requirements for the annual reporting of instances when the Technical Specification I-131 specific activity limit for the primary coolant is exceeded.

The purpose of CTS 6.9.1.5.d is to specify the requirements for submitting information regarding any instances when the Technical Specification I-131 specific activity limit for the primary coolant is exceeded in an annual report. This change is acceptable because the regulations provide adequate details of reporting requirements, and the reporting of exceeding the I-131 limit does not affect continued plant operation. Operations or conditions prohibited by the plant's Technical Specifications are required to be reported in accordance with 10 CFR 50.73. Subsequent reports would be provided if necessary, without requiring a specific annual report. This change is designated as less restrictive because reports that would be submitted under the CTS will not be required under the ITS.

Attachment 1, Volume 16, Rev. 0, Page 211 of 256

Improved Standard Technical Specifications (ISTS) Markup and Justification for Deviations (JFDs)

CTS

5.0 ADMINISTRATIVE CONTROLS

6.9 5.6 Reporting Requirements

6.9.1 The following reports shall be submitted in accordance with 10 CFR 50.4.

6.9.1.4, 6.9.1.5 including Footnotes 1 and 2

5.6.1 Occupational Radiation Exposure Report

- REVIEWER'S NOTE -

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrems and the associated collective deep dose equivalent (reported in person - rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescence dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling < 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year. [The initial report shall be submitted by April 30 of the year following the initial criticality.]

6.9.1.6 including Footnote 3

5.6.2 Annual Radiological Environmental Operating Report

- REVIEWER'S NOTE -

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all

CTS

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued) (1)

6.9.1.6 including footnote 3

environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. (2) In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

6.9.1.7 including Footnote 3

5.6.3 Radioactive Effluent Release Report

- REVIEWER'S NOTE -

(1) A single submittal may be made for a multiple unit station. The submittal shall combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit. (2)

The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. (3) The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

INSERT 1

6.9.1.8

5.6.4 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

5.6.5 CORE OPERATING LIMITS REPORT (COLR)

6.9.1.9.1

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

[The individual specifications that address core operating limits must be referenced here.] (2)

INSERT 2

CTS

3

INSERT 1

6.9.1.7 within 90 days of January 1 of each year

2

INSERT 2

6.9.1.9.1

1. SL 2.1.1, "Reactor Core Safety Limits;"
2. LCO 3.1.1, "SHUTDOWN MARGIN (SDM);"
3. LCO 3.1.3, "Moderator Temperature Coefficient (MTC);"
4. LCO 3.1.5, "Shutdown Bank Insertion Limits;"
5. LCO 3.1.6, "Control Bank Insertion Limits;"
6. LCO 3.2.1, "Heat Flux Hot Channel Factor ($F_Q(Z)$);"
7. LCO 3.2.2, "Nuclear Enthalpy Rise Hot Channel Factor ($F^N_{\Delta H}$);"
8. LCO 3.2.3, "AXIAL FLUX DIFFERENCE (AFD);"
9. LCO 3.3.1, "Reactor Trip System (RTS) Instrumentation," Functions 6 and 7 (Overtemperature ΔT and Overpower ΔT, respectively) Allowable Value parameter values;
10. LCO 3.4.1, "RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits;" and
11. LCO 3.9.1, "Boron Concentration."

Attachment 1, Volume 16, Rev. 0, Page 215 of 256

CTS

5.6 Reporting Requirements

5.6.5 CORE OPERATING LIMITS REPORT (continued) (1)

6.9.1.9.2

b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

[Identify the Topical Report(s) by number and title or identify the staff Safety Evaluation Report for a plant specific methodology by NRC letter and date. The COLR will contain the complete identification for each of the TS referenced topical reports used to prepare the COLR (i.e., report number, title, revision, date, and any supplements).] (2)

INSERT 3

6.9.1.9.3

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 Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.

6.9.1.9.4

d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6.6 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

a. RCS pressure and temperature limits for heat up, cooldown, low temperature operation, criticality, and hydrostatic testing, LTOP arming, and PORV lift settings as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:

[The individual specifications that address RCS pressure and temperature limits must be referenced here.] (4)

b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

[Identify the NRC staff approval document by date.]

c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

CTS

2

INSERT 3

6.9.1.9.2

1. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," (Westinghouse Proprietary);

2. WCAP-8385, "Power Distribution Control and Load Following Procedures - Topical Report," (Westinghouse Proprietary);

3. WCAP-10216-P-A, "Relaxation of Constant Axial Offset Control/F_Q Surveillance Technical Specification," (Westinghouse Proprietary);

4. WCAP-10266-P-A, "The 1981 Version of Westinghouse Evaluation Mode Using BASH Code," (Westinghouse Proprietary); and

5. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Reference Core Report," (Westinghouse Proprietary).

CTS

5.6 Reporting Requirements

5.6.6 RCS PRESSURE AND TEMPERATURE LIMITS REPORT (continued)

- REVIEWER'S NOTE -

The methodology for the calculation of the P-T limits for NRC approval should include the following provisions:

1. The methodology shall describe how the neutron fluence is calculated (reference new Regulatory Guide when issued).

2. The Reactor Vessel Material Surveillance Program shall comply with Appendix H to 10 CFR 50. The reactor vessel material irradiation surveillance specimen removal schedule shall be provided, along with how the specimen examinations shall be used to update the PTLR curves.

3. Low Temperature Overpressure Protection (LTOP) System lift setting limits for the Power Operated Relief Valves (PORVs), developed using NRC-approved methodologies may be included in the PTLR.

4. The adjusted reference temperature (ART) for each reactor beltline material shall be calculated, accounting for radiation embrittlement, in accordance with Regulatory Guide 1.99, Revision 2. (4)

5. The limiting ART shall be incorporated into the calculation of the pressure and temperature limit curves in accordance with NUREG-0800 Standard Review Plan 5.3.2, Pressure-Temperature Limits.

6. LTOP arming temperature limit development methodology.

7. The minimum temperature requirements of Appendix G to 10 CFR Part 50 shall be incorporated into the pressure and temperature limit curves.

8. Licensees who have removed two or more capsules should compare for each surveillance material the measured increase in reference temperature (RT_{NDT}) to the predicted increase in RT_{NDT}; where the predicted increase in RT_{NDT} is based on the mean shift in RT_{NDT} plus the two standard deviation value ($2\sigma_{\Delta}$) specified in Regulatory Guide 1.99, Revision 2. If the measured value exceeds the predicted value (increase $RT_{NDT} + 2\sigma_{\Delta}$), the licensee should provide a supplement to the PTLR to demonstrate how the results affect the approved methodology.

Attachment 1, Volume 16, Rev. 0, Page 218 of 256

CTS

5.6 Reporting Requirements

5.6.7 Post Accident Monitoring Report

Table 3.3-6 Action 22A.2

When a report is required by Condition B or G of LCO 3.3.3 "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6.8 [Tendon Surveillance Report

Any abnormal degradation of the containment structure detected during the tests required by the Pre-stressed Concrete Containment Tendon Surveillance Program shall be reported to the NRC within 30 days. The report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective action taken.]

5.6.9 Steam Generator Tube Inspection Report

6.9.1.4, 6.9.1.5.b, 4.4.5.5

INSERT 4

- REVIEWER'S NOTES -

1. Reports required by the Licensee's current licensing basis regarding steam generator tube surveillance requirements shall be included here. An appropriate administrative controls format should be used.

2. These reports may be required covering inspection, test, and maintenance activities. These reports are determined on an individual basis for each unit and their preparation and submittal are designated in the Technical Specifications.

Attachment 1, Volume 16, Rev. 0, Page 219 of 256

CTS

5

INSERT 4

6.9.1.5.b, 4.4.5.5

a. Within 15 days following the completion of each inservice inspection of steam generator tubes, the number of tubes plugged in each steam generator shall be reported to the NRC.

b. The complete results of the steam generator tube inservice inspection shall be submitted to the NRC prior to March 1 for the inspection that was completed in the previous calendar year. This report shall include:

1. Number and extent of tubes inspected;

2. Location and percent of wall-thickness penetration for each indication of an imperfection; and

3. Identification of tubes plugged.

c. Results of steam generator tube inspections which fall into Category C-3 shall be reported to the NRC in accordance with 10 CFR 50.72. A Licensee Event Report shall be submitted in accordance with 10 CFR 50.73 and shall provide a description of investigations conducted to determine the cause of the tube degradation and corrective measures taken to prevent recurrence.

Attachment 1, Volume 16, Rev. 0, Page 220 of 256

JUSTIFICATION FOR DEVIATIONS
ITS 5.6, REPORTING REQUIREMENTS

1. Grammatical/typographical error corrected.

2. The brackets are removed and the proper plant specific information/value is provided.

3. ISTS 5.6.3 requires submittal of the Radioactive Effluent Release Report prior to May 1 of each year in accordance with 10 CFR 50.36a. The phrase "in accordance with 10 CFR 50.36a" is duplicative of the requirements in 10 CFR 50.36a, and is therefore not required to be in the Technical Specifications. 10 CFR 50.36a states that the report must be submitted within one year of the previous report. The existing CNP CTS submittal date for this report is not May 1 of each year. Since Technical Specifications cannot supersede the requirements of 10 CFR 50, implementation of this change would require NRC approval of an exemption request in accordance with 10 CFR 50.12. This is considered to be outside the scope of the ITS conversion. Therefore, the submittal date for this report is revised in ITS 5.6.3 to reflect the CNP CTS (i.e., within 90 days of January 1 of each year).

4. ISTS 5.6.6, "Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)," is not adopted in the ITS. CTS Figures 3.4-2 and 3.4-3, which provide Reactor Coolant System heatup and cooldown limitations, respectively, were adopted in ITS 3.4.3, "RCS Pressure and Temperature (P/T) Limits." Subsequent Specifications are renumbered accordingly. In addition, since the PTLR is not included in the ITS, approved TSTF-419, which modifies ISTS 5.6.6, is not incorporated.

5. The ISTS Reviewer's Notes have been deleted since they were not intended to be included in the ITS. The requirements for the Steam Generator Tube Inspection Report have been included consistent with these ISTS Reviewer's Notes and the CNP CTS requirements.

Attachment 1, Volume 16, Rev. 0, Page 221 of 256

Specific No Significant Hazards Considerations (NSHCs)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 5.6, REPORTING REQUIREMENTS

There are no specific NSHC discussions for this Specification.

Attachment 1, Volume 16, Rev. 0, Page 223 of 256

ATTACHMENT 7

ITS 5.7, High Radiation Area

Current Technical Specification (CTS) Markup and Discussion of Changes (DOCs)

ITS 5.7

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

See CTS 6.0

6.12 HIGH RADIATION AREA

5.7 6.12.1 Pursuant to 10 CFR 20.1601(c), in lieu of the requirements of 10 CFR 20.1601(a) and (b), each high radiation area in which radiation levels from radiation sources external to the body could result in an individual receiving a dose equivalent in excess of 100 mrem but less than or equal to 1000 mrem in 1 hour at 30 cm from the radiation source or 30 cm from any surface that the radiation penetrates, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

5.7.1

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made aware of it.

c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Plant Radiation Protection Manager in the Radiation Work Permit.

LA.1

5.7.2 6.12.2 The requirements of 6.12.1 shall also apply to each high radiation area in which the radiation level at 30 cm from the radiation source or 30 cm from any surface that the radiation penetrates is greater than 1000 mrem in 1 hour. When possible, locked doors shall be provided to prevent unauthorized entry into such areas, and the keys shall be maintained under the administrative control of the Shift Manager on duty and/or the Plant Radiation Protection Manager. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas. In the event that it is not possible or practicable to provide locked doors due to area size or configuration, the area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

LA.1

5.7.1 * Health Physics (Radiation Protection) personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

Attachment 1, Volume 16, Rev. 0, Page 226 of 256

ITS 5.7

A.1

ITS

6.0 ADMINISTRATIVE CONTROLS

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

See CTS 6.0

6.12 HIGH RADIATION AREA

5.7 5.7.1 6.12.1 Pursuant to 10 CFR 20.1601(c), in lieu of the requirements of 10 CFR 20.1601(a) and (b), each high radiation area in which radiation levels from radiation sources external to the body could result in an individual receiving a dose equivalent in excess of 100 mrem but less than or equal to 1000 mrem in 1 hour at 30 cm from the radiation source or 30 cm from any surface that the radiation penetrates, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made aware of it.

c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Plant Radiation Protection Manager in the Radiation Work Permit.

LA.1

5.7.2 6.12.2 The requirements of 6.12.1 shall also apply to each high radiation area in which the radiation level at 30 cm from the radiation source or 30 cm from any surface that the radiation penetrates is greater than 1000 mrem in 1 hour. When possible, locked doors shall be provided to prevent unauthorized entry into such areas, and the keys shall be maintained under the administrative control of the Shift Manager on duty and/or the Plant Radiation Protection Manager. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas. In the event that it is not possible or practicable to provide locked doors due to area size or configuration, the area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

LA.1

5.7.1 * Health Physics (Radiation Protection) personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

Attachment 1, Volume 16, Rev. 0, Page 227 of 256

DISCUSSION OF CHANGES
ITS 5.7, HIGH RADIATION AREA

ADMINISTRATIVE CHANGES

A.1 In the conversion of the CNP Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1431, Rev. 2, "Standard Technical Specifications-Westinghouse Plants" (ISTS).

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.

MORE RESTRICTIVE CHANGES

None

RELOCATED SPECIFICATIONS

None

REMOVED DETAIL CHANGES

LA.1 *(Type 3 – Removing Procedural Details for Meeting TS Requirements or Reporting Requirements)* CTS 6.12.1.c uses the title "Plant Radiation Protection Manager" and CTS 6.12.2 uses the titles "Shift Manager" and "Plant Radiation Protection Manager." ITS 5.7.1.c uses the generic title "radiation protection manager" and ITS 5.7.2 uses the generic titles "shift manager" and "radiation protection manager." This changes the CTS by moving the specific CNP organizational titles to the UFSAR and replacing them with generic titles.

The removal of these details, which are related to meeting Technical Specification requirements, from the Technical Specifications is acceptable because this type of information is not necessary to be included in Technical Specifications to provide adequate protection of public health and safety. The allowance to relocate the specific CNP organizational titles out of the Technical Specifications is consistent with the NRC letter from C. Grimes to the Owners Groups Technical Specification Committee Chairmen, dated November 10, 1994. The various requirements of the radiation protection manager and the shift manager are still retained in the ITS. Also, this change is acceptable because the removed information will be adequately controlled in the UFSAR. Any changes to the UFSAR are made under 10 CFR 50.59 or 10 CFR 50.71(e), which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because information related to meeting Technical Specification requirements are being removed from the Technical Specifications.

Attachment 1, Volume 16, Rev. 0, Page 228 of 256

DISCUSSION OF CHANGES
ITS 5.7, HIGH RADIATION AREA

LESS RESTRICTIVE CHANGES

None

Attachment 1, Volume 16, Rev. 0, Page 229 of 256

Improved Standard Technical Specifications (ISTS) Markup and Justification for Deviations (JFDs)

CTS

5.0 ADMINISTRATIVE CONTROLS

5.7 High Radiation Area

(1)

6.12.1

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

5.7.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation

a. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.

b. Access to, and activities in, each such area shall be controlled by means of Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

c. Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

d. Each individual or group entering such an area shall possess:

1. A radiation monitoring device that continuously displays radiation dose rates in the area, or

2. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or

3. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area, or

4. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

(i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that

INSERT 1

(1)

Attachment 1, Volume 16, Rev. 0, Page 231 of 256

CTS

5.7

1 **INSERT 1**

6.12.1 including Footnote *

5.7.1 Each high radiation area in which radiation levels from radiation sources external to the body could result in an individual receiving a dose equivalent in excess of 100 mrem but less than or equal to 1000 mrem in 1 hour at 30 cm from the radiation source or 30 cm from any surface that the radiation penetrates, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiological Work Permit (RWP). Radiation protection personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by at least one of the following:

a. A radiation monitoring device that continuously indicates the radiation dose rate in the area;

b. A radiation monitoring device that continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of it; or

c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by a radiation protection manager in the RWP.

6.12.2 5.7.2 In addition to the requirements of Specification 5.7.1 above, for each high radiation area in which the radiation level at 30 cm from the radiation source or 30 cm from any surface that the radiation penetrates is greater than 1000 mrem in 1 hour, locked doors shall be provided, when possible, to prevent unauthorized entry into such areas and the keys shall be maintained under administrative control of the shift manager on duty or a radiation protection manager. Doors shall remain locked except during periods of access by personnel under an approved RWP that shall specify the dose rate levels in the immediate work areas. In the event that it is not possible or practicable to provide locked doors due to area size or configuration, the area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

5.7 High Radiation Area

5.7.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or

(ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.

e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source of from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation

a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door or gate that prevents unauthorized entry, and, in addition:

1. All such door and gate keys shall be maintained under the administrative control of the shift supervisor, radiation protection manager, or his or her designees, and

2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.

b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation

Attachment 1, Volume 16, Rev. 0, Page 233 of 256

5.7 High Radiation Area

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.

d. Each individual group entering such an area shall possess:

1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint, or

2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area, or

3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

(i) Be under surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or

(ii) Be under surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, or personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.

4. In those cases where options (2) and (3), above, are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displaces radiation dose rates in the area.

e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and

Attachment 1, Volume 16, Rev. 0, Page 234 of 256

5.7 High Radiation Area

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

f. Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.

1

Attachment 1, Volume 16, Rev. 0, Page 235 of 256

JUSTIFICATION FOR DEVIATIONS
ITS 5.7, HIGH RADIATION AREA

1. ISTS 5.7 provides requirements for High Radiation Areas. The brackets are removed and the proper plant specific information/value is provided. ITS 5.5.7 is revised to reflect the CNP current licensing basis and high radiation area controls The change is consistent with the requirements in CTS 6.12.

Attachment 1, Volume 16, Rev. 0, Page 236 of 256

Specific No Significant Hazards Considerations (NSHCs)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 5.7, HIGH RADIATION AREA

There are no specific NSHC discussions for this Specification.

Attachment 1, Volume 16, Rev. 0, Page 238 of 256

ATTACHMENT 8

Relocated/Deleted Current Technical Specifications (CTS)

CTS 6.0, Administrative Controls

Current Technical Specification (CTS) Markup and Discussion of Changes (DOCs)

6.0 ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Plant Radiation Protection Manager, who shall meet or exceed qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents and, (3) the Operations Director, who must be qualified as specified in Section 6.2.2.g.

See ITS 5.2 and ITS 5.3

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.

LA.1

6.5 DELETED

Attachment 1, Volume 16, Rev. 0, Page 242 of 256

6.0 ADMINISTRATIVE CONTROLS

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified and a report submitted pursuant to the requirements of 10 CFR 50.73.

A.1

b. Each REPORTABLE EVENT shall be reviewed by the PORC, and the results of this review shall be submitted to the NSRB and the Site Vice President.

LA.2

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a safety limit is violated:

a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Chairman of the NSRB shall be notified within 24 hours.

b. A Safety Limit Violation Report shall be prepared. This report shall be reviewed by the PORC. This report shall describe (1) applicable circumstances preceding the violation; (2) effects of the violation upon facility components, systems or structures; and (3) corrective action taken to prevent recurrence.

See ITS Chapter 2.0

c. The Safety Limit Violation Report shall be submitted to the Commission, the Chairman of the NSRB and the Senior Vice President – Nuclear Operations within 14 days of the violation.

d. Operation of the unit shall not be resumed until authorized by the Commission.

Attachment 1, Volume 16, Rev. 0, Page 243 of 256

6.0 ADMINISTRATIVE CONTROLS

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

LA.3

6.12 HIGH RADIATION AREA

6.12.1 Pursuant to 10 CFR 20.1601(c), in lieu of the requirements of 10 CFR 20.1601(a) and (b), each high radiation area in which radiation levels from radiation sources external to the body could result in an individual receiving a dose equivalent in excess of 100 mrem but less than or equal to 1000 mrem in 1 hour at 30 cm from the radiation source or 30 cm from any surface that the radiation penetrates, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

See ITS 5.7

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made aware of it.

c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Plant Radiation Protection Manager in the Radiation Work Permit.

6.12.2 The requirements of 6.12.1 shall also apply to each high radiation area in which the radiation level at 30 cm from the radiation source or 30 cm from any surface that the radiation penetrates is greater than 1000 mrem in 1 hour. When possible, locked doors shall be provided to prevent unauthorized entry into such areas, and the keys shall be maintained under the administrative control of the Shift Manager on duty and/or the Plant Radiation Protection Manager. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas. In the event that it is not possible or practicable to provide locked doors due to area size or configuration, the area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

* Health Physics (Radiation Protection) personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

Attachment 1, Volume 16, Rev. 0, Page 244 of 256

6.0 ADMINISTRATIVE CONTROLS

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

a. Shall be documented and records of reviews performed shall be retained as required by the Quality Assurance Program Description, Appendix C, Section 6.10.2.n. This documentation shall contain:

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

2. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

b. Shall become effective after review and acceptance by the PORC and the approval of the Plant Manager.

LA.4

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 Changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained as required by the Quality Assurance Program Description, Appendix C, Section 6.10.2.n. This documentation shall contain:

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

2. A determination that the change will maintain the level of radioactive effluent control pursuant to 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

b. Shall become effective after review and acceptance by the PORC and the approval of the Plant Manager.

c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

See ITS 5.5

CTS 6.0

DEFINITIONS

PROCESS CONTROL PROGRAM (PCP)

1.28 The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, state regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

LA.4

1.29 Deleted.

OFFSITE DOSE CALCULATION MANUAL (ODCM)

1.30 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the Environmental Radiological Monitoring Program. The ODCM shall contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.9.1.6 and 6.9.1.7.

See ITS 5.5

GASEOUS RADWASTE TREATMENT SYSTEM

1.31 A GASEOUS RADWASTE TREATMENT SYSTEM is any system designed and installed to reduce radioactive gaseous effluents by collecting primary coolant system off-gases from the primary system and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

VENTILATION EXHAUST TREATMENT SYSTEM

1.32 A VENTILATION EXHAUST TREATMENT SYSTEM is any system designed and installed to reduce gaseous radioiodine or radioactive material in particulate form in effluents by passing ventilation or vent exhaust gases through charcoal absorbers and/or HEPA filters for the purpose of removing iodines or particulates from the gaseous exhaust stream prior to the release to the environment. Such a system is not considered to have any effect on noble gas effluents. Engineered Safety Feature (ESF) atmospheric cleanup systems are not considered to be VENTILATION EXHAUST TREATMENT SYSTEM components.

See ITS Chapter 1.0

PURGE-PURGING

1.33 PURGE or PURGING is the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

VENTING

1.34 VENTING is the controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such manner that replacement air or gas is not provided or required during VENTING. Vent, used in system names, does not imply a VENTING process.

Attachment 1, Volume 16, Rev. 0, Page 246 of 256

6.0 ADMINISTRATIVE CONTROLS

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Plant Radiation Protection Manager, who shall meet or exceed qualifications of Regulatory Guide 1.8, September 1975, (2) the Shift Technical Advisor, who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents and, (3) the Operations Director, who must be qualified as specified in Section 6.2.2.g.

See ITS 5.2 and ITS 5.3

6.4 TRAINING

6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55.

LA.1

6.5 DELETED

Attachment 1, Volume 16, Rev. 0, Page 247 of 256

6.0 ADMINISTRATIVE CONTROLS

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified and a report submitted pursuant to the requirements of 10 CFR 50.73.

A.1

b. Each REPORTABLE EVENT shall be reviewed by the PORC, and the results of this review shall be submitted to the NSRB and the Site Vice President.

LA.2

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a safety limit is violated:

a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Chairman of the NSRB shall be notified within 24 hours.

b. A Safety Limit Violation Report shall be prepared. This report shall be reviewed by the PORC. The report shall describe (1) applicable circumstances preceding the violation; (2) effects of the violation upon facility components, systems or structures; and (3) corrective action taken to prevent recurrence.

See ITS Chapter 2.0

c. The Safety Limit Violation Report shall be submitted to the Commission, the Chairman of the NSRB and the Senior Vice President – Nuclear Operations within 14 days of the violation.

d. Operation of the unit shall not be resumed until authorized by the Commission.

6.0 ADMINISTRATIVE CONTROLS

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

LA.3

6.12 HIGH RADIATION AREA

6.12.1 Pursuant to 10 CFR 20.1601(c), in lieu of the requirements of 10 CFR 20.1601(a) and (b), each high radiation area in which radiation levels from radiation sources external to the body could result in an individual receiving a dose equivalent in excess of 100 mrem but less than or equal to 1000 mrem in 1 hour at 30 cm from the radiation source or 30 cm from any surface that the radiation penetrates, shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by requiring issuance of a Radiation Work Permit*. Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

See ITS 5.7

a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.

b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made aware of it.

c. An individual qualified in radiation protection procedures who is equipped with a radiation dose rate monitoring device. This individual shall be responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the Plant Radiation Protection Manager in the Radiation Work Permit.

6.12.2 The requirements of 6.12.1 shall also apply to each high radiation area in which the radiation level at 30 cm from the radiation source or 30 cm from any surface that the radiation penetrates is greater than 1000 mrem in 1 hour. When possible, locked doors shall be provided to prevent unauthorized entry into such areas, and the keys shall be maintained under the administrative control of the Shift Manager on duty and/or the Plant Radiation Protection Manager. Doors shall remain locked except during periods of access by personnel under an approved RWP which shall specify the dose rate levels in the immediate work areas. In the event that it is not possible or practicable to provide locked doors due to area size or configuration, the area shall be roped off, conspicuously posted and a flashing light shall be activated as a warning device.

* Health Physics (Radiation Protection) personnel shall be exempt from the RWP issuance requirement during the performance of their assigned radiation protection duties, provided they comply with approved radiation protection procedures for entry into high radiation areas.

6.0 ADMINISTRATIVE CONTROLS

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 Changes to the PCP:

a. Shall be documented and records of reviews performed shall be retained as required by the Quality Assurance Program Description, Appendix C, Section 6.10.2.n. This documentation shall contain:

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

2. A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

b. Shall become effective after review and acceptance by the PORC and the approval of the Plant Manager.

LA.4

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 Changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained as required by the Quality Assurance Program Description, Appendix C, Section 6.10.2.n. This documentation shall contain:

1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and

2. A determination that the change will maintain the level of radioactive effluent control pursuant to 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

b. Shall become effective after review and acceptance by the PORC and the approval of the Plant Manager.

c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

See ITS 5.5

DEFINITIONS

PHYSICS TESTS

1.25 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation and 1) described in Chapter 13.0 of the FSAR, 2) authorized under the provisions of 10 CFR 50.59, or 3) otherwise approved by the Commission.

See ITS Chapter 1.0

$\bar{E}$ - AVERAGE DISINTEGRATION ENERGY

1.26 $\bar{E}$ shall be the average (weighted in proportion to the concentration of each radionuclide in the reactor coolant at the time of sampling) of the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives greater than 15 minutes, making up at least 95% of the total non-iodine activity in the coolant.

SOURCE CHECK

1.27 A SOURCE CHECK shall be the qualitative assessment of Channel response when the Channel sensor is exposed to a radioactive source.

PROCESS CONTROL PROGRAM (PCP)

1.28 The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

LA.4

DISCUSSION OF CHANGES
CTS 6.0, ADMINISTRATIVE CONTROLS

ADMINISTRATIVE CHANGES

A.1 CTS 6.6.1, Reportable Event Action, including CTS 6.6.1.a, specifies, in the case of a Reportable Event, that the Commission be notified and a report be submitted pursuant to the requirements of 10 CFR 50.73. The requirements of CTS 6.6.1 and 6.6.1.a are not included in the ITS. This changes the CTS by removing the requirements for Reportable Event Action.

This change is acceptable because the requirements of CTS 6.6.1 and 6.6.1.a are contained in 10 CFR 50.72 and 10 CFR 50.73. Therefore, there is no need to repeat these requirements in the Technical Specifications. Since the CNP Units 1 and 2 Operating Licenses require compliance with 10 CFR 50, the change is designated as administrative because it does not result in technical changes to the CTS.

MORE RESTRICTIVE CHANGES

None

RELOCATED SPECIFICATIONS

None

REMOVED DETAIL CHANGES

LA.1 *(Type 6 - Removal of LCO, SR, or other TS requirements to the TRM, UFSAR, ODCM, QAPD, or IIP)* CTS 6.4 states that a retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55. ITS Chapter 5.0 does not require such a program. This changes the CTS by moving the requirements for the retraining and replacement training program to the UFSAR.

The removal of these details from the Technical Specifications is acceptable because this type of information is not necessary to provide adequate protection of public health and safety. These training provisions are adequately addressed by other proposed ITS Chapter 5.0 provisions and by regulations. ITS 5.3, "Unit Staff Qualifications," provides requirements to ensure adequate, competent staff in accordance with ANSI N 18.1-1971 and Regulatory Guide 1.8, 1975. ITS 5.2 details organization requirements. ITS 5.2.2.a, 5.2.2.b, and 10 CFR 50.54 state minimum shift crew requirements. Training and requalification of NRC licensed positions is contained in 10 CFR 50.55. Placement of training requirements in the UFSAR will ensure that training programs are properly maintained in accordance with CNP Unit 1 and 2 commitments and applicable regulations. Also, this change is acceptable because the removed information will be adequately controlled in the UFSAR. Any changes to the UFSAR are made under 10 CFR 50.59 or 10 CFR 50.71(e), which ensures changes are properly

Attachment 1, Volume 16, Rev. 0, Page 252 of 256

DISCUSSION OF CHANGES
CTS 6.0, ADMINISTRATIVE CONTROLS

evaluated. This change is designated as a less restrictive removal of detail change because a requirement is being removed from the Technical Specifications.

LA.2 *(Type 6 - Removal of LCO, SR, or other TS requirements to the TRM, UFSAR, ODCM, QAPD, or IIP)* CTS 6.6.1.b states that each reportable event shall be reviewed by the PORC, and the results of this review shall be submitted to the NSRB and the Site Vice President. The ITS does not include this requirement. This changes the CTS by moving these details of Reportable Event Action to the Quality Assurance Program Description (QAPD).

The removal of these requirements from the Technical Specifications is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. Given that these reviews and submittal of results are required following the event without a specified completion time, the proposed relocated requirements are not necessary to assure operation of the facility in a safe manner. As such, the relocated requirements are not required to be in the ITS to provide adequate protection of the public health and safety. Also, this change is acceptable because these types of procedural details will be adequately controlled in the QAPD. Any changes to the QAPD are made under 10 CFR 50.54(a), which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because requirements are being removed from the Technical Specifications.

LA.3 *(Type 6 - Removal of LCO, SR, or other TS requirements to the TRM, UFSAR, ODCM, QAPD, or IIP)* CTS 6.11 provides requirements for the Radiation Protection Program. The ITS does not include these requirements. This changes the CTS by moving the requirements for the Radiation Protection Program to the UFSAR.

The removal of these requirements from the Technical Specifications is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. The Radiation Protection Program requires procedures to be prepared for personnel radiation protection consistent with 10 CFR 20. These procedures are for nuclear plant personnel and have no impact on nuclear safety or the health and safety of the public. Requirements to have procedures to implement 10 CFR 20 are contained in 10 CFR 20.1101(b). Periodic review of these procedures is addressed in 10 CFR 20.1101(c). Since the CNP Units 1 and 2 Operating Licenses require compliance with 10 CFR 20, there is no need to repeat the requirements in the ITS. As such, the relocated details are not required to be in the ITS to provide adequate protection of the public health and safety. Also, this change is acceptable because these details will be adequately controlled in the UFSAR. Any changes to the UFSAR are made under 10 CFR 50.59 or 10 CFR 50.71(e), which ensures changes are properly evaluated. This change is designated as a less restrictive removal of detail change because details for meeting Technical Specification and regulatory requirements are being removed from the Technical Specifications.

Attachment 1, Volume 16, Rev. 0, Page 253 of 256

DISCUSSION OF CHANGES
CTS 6.0, ADMINISTRATIVE CONTROLS

LA.4 *(Type 6 - Removal of LCO, SR, or other TS requirements to the TRM, UFSAR, ODCM, QAPD, or IIP)* CTS Definition 1.28 contains the definition for the Process Control Program (PCP). CTS 6.13.1 describe the process for control of changes to the PCP. The ITS does not include these requirements. This changes the CTS by moving the requirements of the PCP to the UFSAR.

The removal of these requirements from the Technical Specifications is acceptable because this type of information is not necessary to be included in the Technical Specifications to provide adequate protection of public health and safety. The PCP implements the requirements of 10 CFR 20, 10 CFR 61, and 10 CFR 71. Compliance with these regulations is required by the CNP Units 1 and 2 Operating Licenses, and procedures are the method to ensure compliance with the program. Regulations provide an adequate level of control for the affected requirements and inclusion of this requirement in the Technical Specifications is not necessary. Also, this change is acceptable because these details will be adequately controlled in the UFSAR. Any changes to the UFSAR are made under 10 CFR 50.59 or 10 CFR 50.71(e), which ensures changes are properly evaluated. This change is designated as a less restrictive removal of requirements because details for meeting Technical Specification and regulatory requirements are being removed from the Technical Specifications.

LESS RESTRICTIVE CHANGES

None

Attachment 1, Volume 16, Rev. 0, Page 254 of 256

Specific No Significant Hazards Considerations (NSHCs)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
CTS 6.0, ADMINISTRATIVE CONTROLS

There are no specific NSHC discussions for this Specification.

Attachment 1, Volume 16, Rev. 0, Page 256 of 256