August 17, 2004

Mr. Michael Kansler
President
Entergy Nuclear Operations, Inc.
440 Hamilton Avenue
White Plains, NY 10601

SUBJECT: PILGRIM NUCLEAR POWER STATION - ISSUANCE OF AMENDMENT RE: MULTIPLE CONTROL ROD REMOVAL, LIMITING CONDITION FOR OPERATION 3/4.10.D (TAC NO. MB6214)

Dear Mr. Kansler:

The Commission has issued the enclosed Amendment No. 207 to Facility Operating License No. DPR-35 for the Pilgrim Nuclear Power Station. This amendment is in response to your application dated August 16, 2002, as supplemented by letters dated March 25, 2003, April 6, and July 22, 2004.

This amendment deletes the existing requirements in Technical Specification 3.10.D.1.d from TS 3/4.10.D, "Multiple Control Rod Removal," and the associated Surveillance Requirement 4.10.D.1.d. This amendment adds a new requirement to TS 3.10.D.1.d. Additionally, this amendment makes an editorial change to correct a reference to TS 3.3.B.3 instead of TS 3.3.B.4 in TS 3/4.10.D.1.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly Federal Register Notice.

Sincerely,

/RA/

Travis L. Tate, Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-293

Enclosures: 1. Amendment No. 207 to License No. DPR-35
2. Safety Evaluation

cc w/encls: See next page

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Division of Licensing Project Management
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2. Safety Evaluation
cc w/encls: See next page
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Accession Number: ML041970450

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OFFICIAL RECORD COPY

Pilgrim Nuclear Power Station

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ENTERGY NUCLEAR GENERATION COMPANY

ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-293

PILGRIM NUCLEAR POWER STATION

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 207
License No. DPR-35

1. The Nuclear Regulatory Commission (the Commission) has found that:

   A. The application for amendment filed by Entergy Nuclear Operations, Inc. (the licensee) dated August 16, 2002, as supplemented March 25, 2003, April 6, and July 22, 2004, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations;

   B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;

   C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;

   D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and

   E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 3.B of Facility Operating License No. DPR-35 is hereby amended to read as follows:

   B. Technical Specifications

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 207, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA by D. Collins for/

James W. Clifford, Chief, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

Date of Issuance: August 17, 2004

ATTACHMENT TO LICENSE AMENDMENT NO. 207

FACILITY OPERATING LICENSE NO. DPR-35

DOCKET NO. 50-293

Replace the following page of the Appendix A Technical Specifications with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the areas of change.

Remove	Insert
3/4.10-3	3/4.10-3

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 207 TO FACILITY OPERATING LICENSE NO. DPR-35

ENTERGY NUCLEAR GENERATION COMPANY

ENTERGY NUCLEAR OPERATIONS, INC.

PILGRIM NUCLEAR POWER STATION

DOCKET NO. 50-293

1.0 INTRODUCTION

By application dated August 16, 2002 (Ref. 1), as supplemented by letters dated March 25, 2003 (Ref. 2), April 6 (Ref. 3), and July 22, 2004 (Ref. 4), Entergy Nuclear Operations, Inc. (ENO or the licensee) requested changes to the Technical Specifications (TSs) for the Pilgrim Nuclear Power Station (Pilgrim). The supplements dated March 25, 2003, April 6, and July 22, 2004, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on December 10, 2002 (67 FR 75873).

In the August 16, 2002, application, the licensee proposed to delete TS 3.10.D.1.d from TS 3/4.10.D, "Multiple Control Rod Removal," and the associated Surveillance Requirement 4.10.D.1.d. Following discussions with the Nuclear Regulatory Commission (NRC) staff, the licensee revised its proposed request for TS 3.10.D.1.d in the March 25, 2003, supplement to clarify the intent of the proposed changes. In the July 22, 2004, supplement, the licensee revised its proposed request for TS 3.10.D.1.d to further clarify the intent of the proposed changes. This change would reduce the number of fuel movements or valve manipulations; thereby, reducing the potential for a fuel-handling accident and worker dose.

Additionally, the proposed request would make an editorial change in TS 3/4.10.D.1 to correct a reference to TS 3.3.B.3 instead of TS 3.3.B.4.

2.0 REGULATORY EVALUATION

Title 10 of the *Code of Federal Regulations* (10 CFR), Section 50.36(c)(2)(ii), specifies four criteria to be used for operation of a nuclear reactor when making a determination of whether a particular structure, system or component is required to be included in a TS limiting condition for operation (LCO). The criterion are as follows: (A) Criterion 1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (B) Criterion 2. A process variable, design feature, or

operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (C) Criterion 3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; or (D) Criterion 4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety. TS LCOs and related requirements that fall within or satisfy any of the criteria in the regulation must be retained in the TSs, while those requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents.

The proposed change pertains to requirements in a TS LCO that meets Criterion 2 from 10 CFR 50.36. The proposed change involves an operating restriction that is an initial condition of a transient analysis that presents a challenge to the integrity of a fission product barrier. During refueling operations, reactivity in boiling water reactor (BWR) cores can be changed by either control rod withdrawals or by fuel movements. Instead of analyzing the possible reactivity-initiated events during refueling operations, General Electric designed the refueling equipment interlocks to prevent inadvertent control rod withdrawals and fuel movement errors. Chapter 15.4 of the Pilgrim Updated Final Safety Analysis Report (UFSAR) does not analyze inadvertent criticality during refueling operations when the core reactivity is being changed (control rod withdrawals or fuel movement). Instead, the Pilgrim UFSAR assumes that the refueling equipment interlocks and the one-rod-out interlock would be operable and would prevent inadvertent criticality due to an error while performing refueling operations.

In a safety evaluation for Amendment No. 41 (Ref. 5), dated February 22, 1980, the requirements of TS 3/4.10.D.1.d, 3/4.10.D.1.e, and 3/4.10.D.1.f, were added to the TSs for Pilgrim because the licensee had not provided an analysis that considered the effect of withdrawing a control blade in addition to the blade associated with the water-filled cavity.

Appendix A to 10 CFR Part 50, “General Design Criteria [GDC] For Nuclear Power Plants,” establishes the minimum requirements for the principal design criteria for nuclear power plants. Criterion 26, “Reactivity control system redundancy and capability,” of the GDC requires that two independent reactivity control systems of different design principles be provided. One of the systems shall be capable of holding the reactor core subcritical under cold conditions. Additionally, Criterion 62, “Prevention of criticality in fuel storage and handling,” of the GDC requires that criticality in the fuel storage and handling system be prevented by physical systems or processes, preferably by use of geometrically safe configurations. TS 3/4.10.D applies to conditions when the plant is in the refueling mode, and when one or more control rods are removed from the core. The purpose of TS 3/4.10.D is to provide the necessary controls to prevent criticality by prohibiting the movement of fuel or control rods into geometrically unsafe configurations.

The principal criterion underlying the NRC staff’s acceptance of the proposed changes is the requirement to maintain a safe core geometric configuration when performing multiple control rod withdrawals or fuel movements.

3.0 TECHNICAL EVALUATION

3.1 Technical Background

The Pilgrim refueling operations are performed with refueling interlocks, which provide protection against inadvertent refueling activities. The refueling interlocks are design-basis automatic features intended to prevent inadvertent reactivity-initiated events during refueling operations. When the reactor mode switch is in the Refuel position, the refueling equipment interlocks receive and process signals from the refueling equipment. The refueling platform position indication interlock senses whether the platform is over or near the core; the refueling platform main hoist grapple senses whether fuel is loaded; and the all-rods-in interlock senses whether all the control rods are inserted to their full-in positions. The refueling equipment interlocks combine the signals to enforce the licensing design-basis assumptions by preventing: (1) the operation of the refueling equipment, to move fuel, if all control rods are not inserted, and (2) control rod withdrawals, if fuel loading is in progress.

As an additional safety feature, the control rod design makes it physically difficult to decouple and remove a control rod blade without initially removing the fuel assemblies from the corresponding fuel cell. Also, BWR cores are designed with sufficient shutdown margin to ensure that the core will remain subcritical, with the highest worth control rod withdrawn to its full-out position. With one control rod withdrawn, the one-rod-out interlock prevents the selection and the withdrawal of a second control rod. The one-rod-out interlock uses the all-rods-in signal, which is based upon the “full in” position indication from all the control rods, to detect a withdrawn control rod, and a rod selection signal (from the Reactor Manual Control System) to detect the selection of another control rod.

Core physics calculations indicate that the creation of two adjacent loaded uncontrolled fuel cells may result in prompt critical conditions. Two adjacent loaded uncontrolled fuel cells can be created by an inadvertent control rod withdrawal from a loaded cell that is adjacent to a loaded uncontrolled fuel cell, or by the inadvertent loading of fuel into adjacent, defueled uncontrolled fuel cells. Under certain conditions, the one-rod-out interlock and the refueling equipment interlocks prevent: (1) inadvertent fuel loading into de-fueled uncontrolled cells and (2) inadvertent withdrawal of a control rod from a loaded fuel cell that is adjacent to or near another loaded fuel cell, with a withdrawn control rod.

Since these interlocks are design-basis requirements that prevent inadvertent fuel loading and control rod withdrawal errors, there are refueling TS LCOs in Section 3.10 to enforce the functions of these refueling interlocks. The refueling LCOs require the refueling interlocks be operable, ensure that control rod withdrawals and fuel movement are not performed simultaneously, and ensure that more than one control rod is not withdrawn.

However, TS 3.10.D, “Multiple Control Rod Removal,” allows one to bypass the position indication probes (PIP), which provide input to the all-rods-in permissive refueling equipment interlocks and the one-rod-out interlock. Since the control rod positions are bypassed for those control rods or control rod drives that are selected for maintenance (control rod or control rod drive removal), the refueling equipment interlocks and the one-rod-out interlock would not be operable for those control rods. All other control rods would remain under the control of the refueling equipment interlocks and the one-rod-out interlock.

3.2 Proposed Change

Currently, TS 3/4.10.D.1.d requires for each of the cells in a 3x3 array centered on the cell selected for control rod removal, that: (1) its control rod be fully inserted and its drive be electrically or hydraulically disarmed, or (2) all four of the cell's surrounding fuel assemblies be removed.

In its application dated August 16, 2002, ENO proposed to delete the requirements in TS 3/4.10.D.1.d. ENO requested the change to reduce the number of fuel movements or control rod drive valve manipulations that would be necessary during maintenance or replacement of control rods.

In the supplement dated July 22, 2004, ENO proposed to modify TS 3.10.D.1.d to prohibit the loading of any fuel into the reactor core under the conditions of TS 3/4.10.D. The following table outlined ENO's proposed changes:

Current TS 3.10.D	**Proposed TS 3.10.D**
1. Any number of control rods and/or control rod drive mechanisms may be removed from the reactor pressure vessel provided that at least the following requirements are satisfied until all control rods and control rod drive mechanisms are reinstalled and all control rods are fully inserted in the core.	1. {no change}
a. The reactor mode switch is operable and locked in the Refuel position except that the position indication may be bypassed, as required, for those control rods and/or control rod drive mechanisms to be removed, after the fuel assemblies have been removed as specified below.	a. {no change}
b. The source range monitors (SRM) are operable per Specification 3.3.B.4.	b. {change reference from Specification 3.3.B.4 to 3.3.B.3}
c. The Reactivity Margin requirements of Specification 3.3.A.1 are satisfied.	c. {no change}
d. All control rods in a 3x3 array centered on each of the control rods being removed are fully inserted and electrically or hydraulically disarmed, or have the surrounding four fuel assemblies removed from the core cell.	d. No fuel is being loaded into the reactor core
e. All other control rods are fully inserted.	e. {no change}
f. The four fuel assemblies are removed from the core cell surrounding each control rod or control rod drive mechanism to be removed from the core and/or reactor vessel.	f. {no change}

The licensee's revised proposed changes, as presented in the July 22, 2004, supplement would replace the current 3x3 buffer array requirement with a requirement that no fuel is being loaded into the reactor core, while refueling under the requirements of TS 3/4.10.D.

ENO also proposed to change the reference in TS 3/4.10.D.1.b from Specification 3.3.B.4 to 3.3.B.3, such that the requirement will read, "The source range monitors (SRM) are operable per Specification 3.3.B.3."

3.3 Evaluation of Proposed Change

TS 3.10.D.1.d was added in Amendment No. 41 to provide the necessary controls to protect against the potential for establishing an unsafe core geometric configuration by preventing the inadvertent withdrawal of a control rod from an adjacent, loaded fuel cell. This is accomplished by inserting the control rods and disarming the control rod drives in a 3X3 array of fuel cells surrounding the cell from which the control rod is removed or withdrawn. If a loaded uncontrolled fuel cell is formed by inadvertently loading fuel into the central cell, then a second, adjacent loaded uncontrolled fuel cell could not be formed, since all the adjacent cells are required to be either controlled (control rods are inserted and disarmed to prevent inadvertent withdrawal) or defueled.

Since TS 3.10.D.1.e requires all other control rods to be fully inserted, the creation of any loaded uncontrolled fuel cells by inadvertently loading fuel into uncontrolled, defueled cells would be a TS violation. (Control rods in a defueled cell are supported by blade guides.) Since the PIPs for all other control rods are OPERABLE, then withdrawal of another control rod would actuate the one-rod-out interlock and the refueling equipment interlock (if fuel loading is in progress). Therefore, under the current Pilgrim TS requirement, the administrative requirement in TS 3.10.D.1.e. is supported by training, procedures, refueling equipment interlocks, and the one-rod-out interlock.

TS 3.10.D.1.f requires that the four fuel assemblies, removed from the core cell surrounding each control rod or control rod drive mechanism be removed from the core and/or reactor vessel. This requirement ensures that the fuel removed from the defueled cell is not temporarily loaded into other defueled core cells, increasing the potential for inadvertent fuel loading errors.

TSs 3/4.10.D.1.d., 3/4.10.D.1.e, and 3/4.10.D.1.f were added to the Pilgrim's TSs in February 1980 as part of Amendment No. 41 because the licensee had not provided information addressing the effects of withdrawing a second control rod (in addition to the control rod that is removed for maintenance). Instead, the licensee relied upon the UFSAR's assertion that the protection provided by the system of refueling interlocks made such evaluations unnecessary.

During multiple control rod operations, the NRC staff's concern remains focused upon the possibility of creating an unsafe core geometric configuration by: (1) inadvertently withdrawing a second control rod from a loaded adjacent fuel cell, (2) inadvertently loading fuel into an uncontrolled cell, or (3) a combination of the two. The staff expressed this concern to the licensee in a telephone conference on March 13, 2003. ENO responded on March 25, 2003, with a supplemental proposal to prohibit the loading of any fuel while refueling under the terms of TS 3/4.10.D. This additional requirement was viewed by the staff as an administrative measure intended to substitute for a hardware configuration (the 3x3 array of cells without fuel

or with disarmed control rod drives). The staff continued to be concerned with the possibility that an unsafe core geometry could be formed while refueling under the proposed TS requirements.

To illustrate its concern, the staff postulated two scenarios that could lead to an unsafe core geometry as a result of only two errors, as outlined in a Request for Additional Information (RAI) (Ref. 6) to ENO which requested that an analysis be provided to show that withdrawal of a second control rod from an adjacent cell would be acceptable.

The scenarios are: (1) the cell that is selected for maintenance is inadvertently loaded with fuel, and the control rod in an adjacent cell is inadvertently withdrawn; and (2) the control rod PIP, in a cell is selected for maintenance, is bypassed and its control rod is withdrawn before the cell is defueled; and, the control rod in an adjacent cell is inadvertently withdrawn.

The licensee considered the staff's concern, and reviewed the postulated scenarios. ENO's response to the RAI dated April 6, 2004, addressed the staff's concern by detailing the refueling procedures, checks, and precautions that would pertain to the postulated scenarios, and concluded that more than two errors would be required to realize either of the postulated scenarios. In the first scenario, a loaded uncontrolled fuel cell is created by a fuel loading error, whereas, in the second scenario, a loaded uncontrolled fuel cell is created by withdrawal of two control rods; one in the cell that is selected for maintenance and one in an adjacent cell.

To address the fuel loading error scenario, the licensee stated in the supplement that, "Individual fuel moves are controlled via a fuel movement schedule that is approved by Reactor Engineering. Deviations from the fuel movement schedule are only allowed if documentation is provided and both the On-duty Shift [M]anager and a Reactor Engineer approve the change. A Refueling Services Technician (RST) uses the fuel movement schedule to identify the move sequence and from-to locations. Each move is independently verified and supervised by a Senior Reactor Operator (SRO), who has no other concurrent responsibilities during the fuel move operation. Each fuel move is communicated to the Control Room to facilitate separate Control Room fuel move tracking. These administrative controls minimize fuel move errors when fuel is being handled. In addition to the controlled fuel movement schedule and the independent move verifications, site procedures and refueling interlocks are also used to prevent fuel movement errors."

With respect to the control rod withdrawal scenario, the licensee stated, "The Rod Position Information System (RPIS) provides Control Room indication of control rod position. During control rod multiple withdrawal for control rod drive or control rod blade exchanges, it becomes necessary to provide jumpers/lifted leads to modify the system to allow normal control rod and refuel bridge movement until the drive or blade maintenance is completed and all rods are fully inserted. Station procedures are used to identify the control rod locations that require maintenance and to define the process used to control jumper installation and removal. The jumpers simulate a "Full In" indication and are installed on the input of the probe buffer card in the [RPIS]. Jumpers are only installed on control rod locations that require rod withdrawal to facilitate maintenance. Additionally, jumpers are only installed after applicable [TSs] are verified and after the Refuel Floor SRO verifies that all fuel assemblies are removed from the core cells surrounding the control rod. Jumpers are tracked to ensure removal and are only removed after the control rod is verified fully inserted. Control rod position indication in the Control Room is not impacted by the installation or removal of these jumpers."

The licensee also stated that, “Per the outage schedule[,] fuel shuffle and core loading activities will not begin until in-vessel maintenance is completed. Per proposed [TS] 3.10.D[,] no fuel is being loaded into the core when control rods are withdrawn. Per plant procedures[,] refuel interlocks will be verified operable prior to moving fuel. Therefore, prior to initiating core reload or in-vessel fuel shuffling, all control rod drive and blade maintenance will be complete, all rod position jumpers will be removed, all control rods will be fully inserted, and the refueling platform interlocks will be tested and operable.”

In the April 6, 2004, supplement, the licensee noted the steps, checks, communications, and personnel required to make the fuel movements, connect the control rod position jumpers, respond to the alarms that may be actuated, and implement various other operations that are in place to prevent the formation of an unsafe core geometry. In the supplement dated July 22, 2004, ENO further clarified the proposal to prohibit fuel loading under TS 3/4.10.D. ENO concluded that more than two errors would be required in order to realize the NRC staff’s postulated scenarios. Based on the information provided in the April 6, and July 22, 2004, supplements, the NRC staff agrees that more than two errors would be required for either of the postulated scenarios to occur.

ENO also noted that the proposed prohibition of fuel loading is consistent with the NRC’s Information Notice (IN) 83-85, “Fuel Movement with Control Rods Withdrawn.” This IN addressed two industry events wherein fuel was loaded into core locations that had control rods withdrawn. The IN referenced General Electric Service Information Letter (SIL) No. 372 which identified potential problems with moving fuel into the core with multiple control rods withdrawn and recommended that utilities adopt the principle of not loading any fuel whenever multiple control rods are withdrawn. The licensee stated that the proposed TS change would be consistent with the GE SIL recommendation in that it will prohibit fuel loading into the core whenever multiple control rods are withdrawn.

The NRC staff has reviewed the information provided by the licensee. The NRC staff determined that the procedures and interlocks, in conjunction with the proposed operating restriction, would provide effective protection against the creation of two adjacent loaded uncontrolled fuel cells. Therefore, the changes provide sufficient controls to prevent the formation of an unsafe core geometric configuration when refueling under the terms of TS LCO, Section 3.10.D. The NRC staff concludes that the proposed changes meet the requirements of 10 CFR 50.36 because the changes provide protection that is equivalent to the protection provided by the current TSs.

The proposed change to correct the reference from Specification 3.3.B.4 to 3.3.B.3, in TS 3/4.10.D.1.b, stems from Amendment No. 186 (Ref. 7), which revised Specification 3.3.B.4 and renumbered it to 3.3.B.3. The staff determined that this proposed change is administrative in nature and, therefore, is acceptable.

3.4 Conclusion

The staff has reviewed ENO's proposed changes to the Pilgrim TSs to facilitate the process of maintaining and replacing control rods during refueling outages. The proposed change deletes a requirement that is intended to guard against unsafe core geometric configurations caused by the formation of loaded uncontrolled fuel cells in adjacent core locations. Instead, equivalent protection is provided by a proposed new requirement that prohibits all fuel loading by a variety of procedures and other administrative precautions, as well as, by the one-rod-out interlock. Based on the discussion presented above, the staff finds the proposed change acceptable.

The staff also reviewed ENO's proposed change to correct a reference in TS 3/4.10.D.1.b from Specification 3.3.B.4 to 3.3.B.3 such that the requirement will read, "The source range monitors (SRM) are operable per Specification 3.3.B.3." This proposal has its origins in Amendment No. 186, which revised Specification 3.3.B.4 and renumbered it to 3.3.B.3. The staff determined the proposed change to be administrative in nature and finds the change acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Massachusetts State Official was notified of the proposed issuance of the amendment. The State official had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (67 FR 75873). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

6.0 CONCLUSION

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

7.0 REFERENCES

1. Robert M. Bellamy, Entergy Nuclear Operations, Inc., letter to USNRC, "Request for Amendment to the Technical Specifications, Deletion of Requirement from TS LCO 3/4.10.D, 'Multiple Control Rod Removal'," August 16, 2002 (ML022380343)

2. Robert M. Bellamy, Entergy Nuclear Operations, Inc., letter to USNRC, “Response to NRC Request for Additional Information, Deletion of Requirement from TS LCO 3/4.10.D, ‘Multiple Control Rod Removal’,” March 25, 2003 (ML030920014)

3. Stephen J. Bethay, Entergy Nuclear Operations, Inc., letter to USNRC, “Response to NRC Request for Additional Information, Deletion of Requirement from TS LCO 3/4.10.D, ‘Multiple Control Rod Removal’,” April 6, 2004 (ML041050129)

4. Michael A. Balduzzi, Entergy Nuclear Operations, Inc., letter to USNRC, “Deletion of Requirement from LCO 3/4.10.D, ‘Multiple Control Rod Removal’,” July 22, 2004 (ML042160226)

5. Thomas A. Ippolito, USNRC, letter to G. Carl Andognini, Boston Edison Company, "Amendment No. 41 to Facility Operating License No. DPR-35," February 22, 1980

6. Travis L. Tate, USNRC, letter to Michael Kansler, Entergy Nuclear Operations, Inc., “Request for Additional Information Re: Deletion of Requirement From Technical Specification, Limiting Condition for Operation 3/4.10.D, Multiple Control Rod Removal (TAC NO. MB6214),” December 24, 2003 (ML033430506)

7. Alan B. Wang, USNRC, letter to Mike Bellamy, Entergy Nuclear Generation Company, “Issuance of Amendment Re: Compliance with the Operating Requirements Derived from NEDO-21231 (TAC NO. MA6107),” October 16, 2000 (ML003744478)

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