September 9, 2004

Mr. David A. Christian
Sr. Vice President and Chief Nuclear Officer
Dominion Nuclear Connecticut, Inc.
Innsbrook Technical Center
5000 Dominion Boulevard
Glen Allen, VA 23060-6711

SUBJECT: MILLSTONE POWER STATION, UNIT NO. 2 - ISSUANCE OF AMENDMENT RE: TECHNICAL SPECIFICATION CHANGES TO THE BORATION, EMERGENCY CORE COOLING, CONTAINMENT SPRAY AND COOLING, AND AUXILIARY FEEDWATER SYSTEMS (TAC NO. MB5019)

Dear Mr. Christian:

The Commission has issued the enclosed Amendment No. 283 to Facility Operating License No. DPR-65 for the Millstone Power Station, Unit No. 2, in response to your application dated May 7, 2002, as supplemented on April 7, 2003 and July 19, 2004.

The amendment revises the Technical Specification (TS) Limiting Condition for Operation, action requirements, and surveillance requirements associated with the Emergency Core Cooling, Containment Spray and Cooling, and Auxiliary Feedwater Systems. In addition, the amendment revises the TSs to retain the boron dilution analysis restrictions as a result of the relocation of the Boration System TS requirements to the Technical Requirements Manual.

As a result of the considerable number of changes proposed, the staff treated your application similar to a conversion to the improved TSs, modeled on the Standard Technical Specifications.

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/

Victor Nerses, Senior Project Manager, Section 2
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-336

Enclosures: 1. Amendment No. 283 to DPR-65
2. Safety Evaluation

cc w/encls: See next page

September 9, 2004

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Docket No. 50-336
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cc w/encls: See next page
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Millstone Power Station
Unit 2

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DOMINION NUCLEAR CONNECTICUT, INC.

DOCKET NO. 50-336

MILLSTONE POWER STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 283
License No. DPR-65

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

   A. The application for amendment by the applicant dated May 7, 2002, as supplemented on April 7, 2003 and July 19, 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 set forth in 10 CFR Chapter I;

   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 2.C.(2) of Facility Operating License No. DPR-65 is hereby amended to read as follows:

   (2) Technical Specifications

   The Technical Specifications contained in Appendix A, as revised through Amendment No. 283, 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 90 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Daniel S. Collins, Acting 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: September 9, 2004

ATTACHMENT TO LICENSE AMENDMENT NO. 283

FACILITY OPERATING LICENSE NO. DPR-65

DOCKET NO. 50-336

Replace the following pages of the Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	Insert
IV	IV
XI	XI
3/4 1-4	3/4 1-4
3/4 1-8	3/4 1-8
3/4 1-9	3/4 1-9
3/4 1-10	3/4 1-10
3/4 1-11	3/4 1-11
3/4 1-13	3/4 1-13
3/4 1-14	3/4 1-14
3/4 1-15	3/4 1-15
3/4 1-16	3/4 1-16
3/4 1-16a	3/4 1-16a
3/4 1-17	3/4 1-17
3/4 1-18	3/4 1-18
3/4 1-19	3/4 1-19
3/4 5-3	3/4 5-3
3/4 5-4	3/4 5-4
3/4 5-5	3/4 5-5
3/4 5-5a	----------
3/4 5-6	3/4 5-6
3/4 5-6a	----------
3/4 5-7	3/4 5-7
3/4 6-12	3/4 6-12
3/4 6-13	3/4 6-13
3/4 7-4	3/4 7-4
3/4 7-5	3/4 7-5
B 3/4 1-1a	B 3/4 1-1a
B 3/4 1-2	B 3/4 1-2
B 3/4 1-3	----------
B 3/4 1-3a	----------
B 3/4 5-2	B 3/4 5-2
B 3/4 5-2a	B 3/4 5-2a
B 3/4 5-2b	B 3/4 5-2b
B 3/4 5-2c	B 3/4 5-2c
B 3/4 5-2d	B 3/4 5-2d
----------	B 3/4 5-2e
B 3/4 6-3	B 3/4 6-3
B 3/4 6-3a	B 3/4 6-3a
B 3/4 6-3b	B 3/4 6-3b
B 3/4 6-3c	B 3/4 6-3c
B 3/4 6-3d	B 3/4 6-3d
B 3/4 6-3e	B 3/4 6-3e

Remove	Insert
B 3/4 6-3f	B 3/4 6-3f
----------	B 3/4 6-3g
B 3/4 7-2	B 3/4 7-2
B 3/4 7-2a	B 3/4 7-2a
B 3/4 7-2b	B 3/4 7-2b
----------	B 3/4 7-2c

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 283

TO FACILITY OPERATING LICENSE NO. DPR-65

DOMINION NUCLEAR CONNECTICUT, INC.

MILLSTONE POWER STATION, UNIT NO. 2

DOCKET NO. 50-336

1.0 INTRODUCTION

By application May 7, 2002, as supplemented on April 7, 2003 and July 19, 2004, Dominion Nuclear Connecticut, Inc. (the licensee) requested changes to the Millstone Power Station, Unit No. 2 (MP2) Technical Specifications (TSs). The supplements dated April 7, 2003, and July 19, 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 June 11, 2002 (67 FR 40021).

The proposed amendment would revise the TS Limiting Condition for Operation (LCO), action requirements, and surveillance requirements (SRs) associated with the Emergency Core Cooling, Containment Spray and Cooling, and Auxiliary Feedwater Systems. The proposed changes would remove redundant testing requirements that are already addressed by the Inservice Testing (IST) Program, which is required pursuant to TS 4.0.5. The proposed changes would also increase the allowed outage time and shutdown time for an inoperable train (subsystem) of the Emergency Core Cooling System (ECCS), consistent with standard industry guidelines and other MP2 TSs. The proposed amendment would also relocate the Boration System TS requirements to the Technical Requirements Manual (TRM). Additional TS changes to retain boron dilution analysis restrictions would be made as a result of the relocation of the Boration System TS requirements to the TRM.

2.0 REGULATORY EVALUATION

Section 182a of the Atomic Energy Act of 1954, as amended (the Act), requires applicants for nuclear power plant operating licenses to state TSs to be included as part of the license. The Nuclear Regulatory Commission's (NRC or Commission) regulatory requirements related to the content of TSs are set forth in Section 50.36 of Title 10 of the *Code of Federal Regulations* (10 CFR). That regulation requires that the TSs include items in five specific categories, including: (1) safety limits, limiting safety system settings and limiting control settings; (2)LCOs; (3) SRs; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in a plant's TSs. The Commission has provided guidance for the contents of TSs in its "Final Policy Statement on Technical

Specifications Improvements for Nuclear Power Reactors" (Final Policy Statement), as published in the *Federal Register* on July 22, 1993 (58 FR 39132), in which the Commission indicated that compliance with the Final Policy Statement satisfies Section 182a of the Act. In particular, the Commission indicated that certain items could be relocated from the TSs to licensee-controlled documents, consistent with the standard enunciated in Portland General Electric Company (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). In that case, the Atomic Safety and Licensing Appeal Board indicated that "technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety." Consistent with this approach, in its Final Policy Statement the Commission identified four criteria to be used in determining whether a facility's TSs must include an LCO, and associated appropriate action and SRs, for a particular structure, system, or component (SSC), process variable, design feature, or operating restriction, as follows:

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.

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.

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.

Criterion 4 — A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

These criteria have been codified in 10 CFR 50.36(c)(2)(ii)). See Final Rule, "Technical Specifications," 60 FR 36593 (July 19, 1995). As a result, TS requirements which fall within or satisfy any of the criteria in the Final Policy Statement must be retained in the TSs, while those TS requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents. The Final Policy Statement provides that those existing TS LCOs which do not satisfy these four criteria may be relocated to the Final Safety Analysis Report (FSAR), so that future changes could be made to these provisions pursuant to 10 CFR 50.59. Other TS requirements may be moved to more appropriate documents, such as the TRM, the IST Program, the TS Bases, the Systems Integrity Program, and procedures required by TS 6.8.1. Any changes to these documents are also controlled by the applicable regulatory requirements, such as TSs, 10 CFR 50.55a, and 10 CFR 50.59.

In addition to the above criteria in 10 CFR 50.36, the staff reviewed the proposed changes using other applicable regulatory guidance and docketed information including the following:

- The FSAR description of each system associated with a specification that the licensee has proposed to relocate to the TRM.

- Letter from Thomas E. Murley, NRC, to industry owners groups chairmen, dated May 9,1988. This letter forwarded a report entitled, “NRC Staff Review of Nuclear Steam Supply System Vendor Owners Groups’ Application of the Commission’s Interim Policy Statement Criteria to Standard Technical Specifications” (the NRC “Split Report”).

- The model TSs contained in the improved standard technical specifications (STSs), NUREG-1432, Revision 2, “Standard Technical Specifications, Combustion Engineering Plants," dated April 2001.

- The model TSs contained in the previous STSs, NUREG-0212, Revision 2, “STSs for Combustion Engineering Pressurized Water Reactors," dated fall 1980.

- 10 CFR 50.59, 10 CFR 50.55a, 10 CFR 50.54, 10 CFR 50.36, 10 CFR 50.34.

- NUREG-1482, “Guidelines for Inservice Testing at Nuclear Power Plants,” April 1995.

- Generic Letter 91-04, “Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle,” April 2, 1991.

Changes to the specifications proposed for relocation to the TRM will require evaluation in accordance with 10 CFR 50.59.

3.0 EVALUATION

The NRC staff has organized this safety evaluation (SE) by identifying each proposed TS change as belonging to one of the following TS change categories:

A	Administrative	A change that neither reduces nor increases the existing operational limitations and administrative controls for the facility.
M	More Restrictive	A change that increases an existing operational limitation or administrative control, or that adds a new operational limitation or administrative control for the facility.
L	Less Restrictive (Specific)	A change that reduces or deletes an existing operational limitation or administrative control for the facility.
LA	Less Restrictive (Generic)	A change that involves moving detailed technical information or requirements, which are inappropriate or unnecessary for inclusion in TSs, to licensee-controlled documents.
R	Relocation	A change that moves an LCO and associated action and SR to a licensee-controlled document, such as the FSAR or the TRM.

Grouping TS changes in these five categories is customary for evaluating applications that propose to convert a facility's TSs to improved TSs, modeled on the STSs. The NRC staff chose this approach for this review because of the number of changes proposed and the similarity of the resulting TS requirements to corresponding provisions in the STSs.

The staff has described the proposed TS changes in Table 1, which is attached to this SE. For each change, the table indicates the change category using the designators A, M, L, LA, or R, as previously defined. The table also references the licensee's discussion of each change, by listing the corresponding paragraph number in Attachment 1 of the licensee's application. For some of the changes, Attachment 1 contains additional discussion in un-numbered paragraphs. In these cases, Table 1 also lists the page number(s) of Attachment 1 where the additional discussions may be found. The following subsections provide detailed discussions of the five TS change categories, and the staff's evaluations of the acceptability of changes under each category.

3.1 Administrative Changes

Administrative changes, which are incidental to adopting STS format or phrasing, are intended to incorporate human factors principles into the form and structure of the TSs making them easier to understand and use by plant operations personnel. These changes are editorial in nature and involve reorganizing, reformatting, and clarifying TS requirements without affecting technical content or operational restrictions. Among the administrative-type changes proposed by the licensee in the present application and found acceptable by the NRC staff are:

- Using plant-specific terms for names of SSCs;
- Splitting up requirements currently grouped under a single specification to more appropriate locations in two or more specifications;
- Combining related requirements currently presented in separate specifications into a single specification;
- Presentation changes that involve rewording or reformatting for clarity (including reorganizing existing requirements within the TSs) that do not involve changing operational requirements and restrictions;
- Wording changes and additions that are consistent with established interpretations and practices to more clearly or explicitly state the NRC staff's accepted intent of existing TS requirements;
- Deletion of redundant statements of requirements that are unnecessarily specified in more than one location in the TSs; and
- Editorial changes to correct typographical, spelling, and grammatical errors.

Table 1 lists the administrative changes proposed by the licensee. It provides a summary description of the administrative change that was made, and references to the specifications involved in the change. The NRC staff reviewed all of the administrative changes proposed by the licensee and finds them acceptable because they do not result in any substantive change in operating requirements and are consistent with the Commission's regulations.

3.2 More Restrictive Changes

The licensee proposed a number of requirements that are more restrictive than those in the existing TSs. Proposed TSs in this category include changes to existing requirements and new requirements that represent additional restrictions on plant operation. More restrictive requirements in the present application include increases in the scope of equipment subject to an SR, decreases in the time allowed to complete a required action, decreases in operational flexibility for performing a surveillance, and additional SRs. Table 1 lists the proposed more restrictive changes incorporated in the TSs. It provides a summary description of each more restrictive change that was made, and references the affected TSs. Changes categorized as more restrictive are acceptable because they place additional limitations on plant operation that enhance safety.

3.3 Less Restrictive Changes (Specific)

Less restrictive changes include deletions and relaxations to TS requirements. When requirements have been shown to give little or no safety benefit, their removal from the TSs may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups comments during the development of the STSs. The NRC staff reviewed generic relaxations contained in the STSs and found them acceptable because they are consistent with current licensing practices and the Commission's regulations.

Less restrictive changes proposed by the licensee involved deletions and relaxations to TS requirements. The NRC staff evaluated these changes under the following five change categories:

Category I - Relaxation of a Surveillance Frequency

Category II - Deletion of a Redundant Surveillance Requirement

Category III - Relaxation of a Surveillance Requirement Acceptance Criterion

Category IV - Relaxation of a Required Action Completion Time

Category V - Relaxation of a Limiting Condition for Operation

The following discussions address why the proposed TS changes within each of these categories are acceptable.

3.3.1 Relaxation of Surveillance Frequency (Category I)

A facility's TS SRs specify time interval requirements, or frequencies, for verifying that the plant is operating within specified parameter limits or for performing tests to verify that required systems are capable of performing their intended safety functions, i.e., that they are operable. Increasing the time interval between performances of a surveillance for an SSC can enhance safety by increasing the SSC's overall availability (by decreasing the contribution of testing to the SSC's unavailability), while maintaining or increasing the SSC's reliability. In general, the STSs contain test frequencies that are consistent with industry practice or industry standards for achieving acceptable levels of equipment reliability. Adoption of STS testing practices by plants is acceptable when justified on the basis of similar design, like-component testing for the system application, and the availability of other TS requirements that provide regular checks to ensure limits are met. Reduced testing is also acceptable when it is consistent with industry practice or industry standards, such as manufacturers' recommendations, and when operating experience has shown that the specified SSC usually passes the surveillance when performed at the currently specified interval. In such cases, the relaxed surveillance frequency is acceptable because the expectation of no reduction in reliability of the equipment or component is adequately justified. In the present application, the licensee proposed relaxing surveillance test intervals for pumps and valves that are already included in the MP 2 IST program. These changes, which are consistent with STSs, are acceptable because IST program test frequencies are derived from the requirements and recommendations of industry standards for IST and 10 CFR 50.55a, and on operating experience in the testing of safety system pumps and valves. In addition, should a tested component exhibit declining performance, the licensee's IST program will require testing the component more frequently. The staff finds that relaxing surveillance frequencies, as proposed in the present application, will not adversely impact the capability of the affected pumps and valves to perform their intended safety functions.

In addition to increasing test intervals, surveillance frequency relaxations include removing unnecessary staggered testing requirements. The licensee proposed removing the requirements to test two train systems (e.g., ECCS) on a staggered test basis. The MP2 TS staggered testing requirements are consistent with the Combustion Engineering STSs that were current at the time MP2 was initially licensed. The purpose of specifying staggered testing is to minimize the potential for human error-related common cause failures.

MP2 TS 1.21 defines staggered test basis as:

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

Hence, testing on a staggered basis requires testing each train alternately at a frequency equal to one-half of the specified interval. Any one train would then be tested once within the specified interval, but the redundant train (for the case of n = 2) would not be tested until the beginning of the next subinterval. Inservice test intervals for pumps and valves, which are

based on industry standards, were relaxed from monthly to quarterly subsequent to the initial licensing of MP2. In view of this change and recognizing that the benefit of testing on a staggered test basis to the prevention of common mode failures was not significant enough to justify the additional administrative burden associated with scheduling the surveillance tests, the NRC omitted staggered testing from many SRs in NUREG-0212.

In its letter of April 7, 2003, the licensee addressed its proposal to remove staggered testing from ECCS subsystems, containment spray (CS) trains, and containment air recirculation and cooling system trains:

> It is acceptable because the proposed testing on a non-staggered frequency will continue to verify the system performs as required. It is common practice at Millstone Unit No. 2, as well as most other nuclear facilities, to test the safety systems by trains. For example, ECCS Train A would be tested with CS Train A during the same work window, although not necessarily at the exact same time. Normally, different components on different trains are not tested on the same day. This is a good operating practice because it prevents components from opposite trains from being inoperable at the same time. In addition, testing on a non-staggered frequency will provide increased flexibility in the scheduling of surveillance testing while not changing the overall surveillance frequency. Therefore, this less restrictive change will not adversely impact public health and safety.

The NRC staff finds that deleting staggered inservice test requirements from the MP2 TSs, as proposed in the present application, is acceptable.

For the reasons stated, the staff concludes that the proposed relaxations of surveillance frequencies, which are consistent with STSs, will not adversely impact plant safety. Therefore, changes identified as Category I are acceptable.

3.3.2 Deletion of a Redundant Surveillance Requirement (Category II)

The MP2 TSs contain SRs that are redundant to other TS testing requirements, or are redundant to regulation. Although not usually duplicative of other TSs or regulatory requirements, such surveillances verify similar specified conditions. SRs like these, which are proposed for removal in the present application, include verification of emergency electrical power to ECCS components and verification of a flow path through an operable shutdown cooling heat exchanger upon automatic opening of containment sump recirculation isolation valves. These requirements are redundant to electrical power distribution and power source specifications, the surveillance that verifies correct CS system flow path valve alignment, and the TS definition of operability. These deletions are acceptable because the retained TS requirements are adequate to ensure the tested equipment and subsystems meet the associated LCO operability requirements. The staff finds that these changes, which are consistent with STSs, will not adversely impact plant safety. Therefore, changes identified as Category II are acceptable.

3.3.3 Relaxation of a Surveillance Requirement Acceptance Criterion (Category III)

SR acceptance criteria typically include individual component or subsystem performance measures, such as flow rate, pump differential pressure (pump head), and actuation time. In some cases, surveillances specify test conditions that may be overly restrictive, or even unnecessary to adequately demonstrate equipment operability. The present application proposes to change such test conditions. These are (1) pump minimum run time and (2) use of a test actuation signal to demonstrate automatic actuation of an end device (pump start or valve repositioning). Requiring high-pressure safety injection (HPSI), low-pressure safety injection (LPSI), CS, and auxiliary feedwater (AFW) pumps to run for a minimum of 15 minutes on recirculation flow is an unnecessary restriction. These surveillances correspond to IST, specified by TS 4.0.5, and implemented by the licensee's IST program for MP2, which conforms to 10 CFR 50.55a. The IST requirements and associated test procedures require that these pumps run long enough before taking data to ensure the test results can be relied upon to accurately track pump performance. Therefore, the 15-minute run requirement may be deleted from these SRs. The surveillances that verify pump and valve actuation on a test signal are revised to allow taking credit for an actual signal from the engineered safety features actuation system instrumentation (e.g., in the event an actual signal is generated by an abnormal plant condition or system malfunction), as well as a simulated (i.e., test) signal, for meeting the SR acceptance criteria. This is acceptable because the end device cannot distinguish between an actual or simulated signal. Changes like this have no impact on the validity of such surveillances, but do provide flexibility in meeting them. The NRC staff finds that crediting actual actuation signals and leaving pump run time to IST procedures are consistent with STSs and will not adversely impact plant safety. Therefore, changes identified as Category III are acceptable.

3.3.4 Relaxation of a Required Action Completion Time (Category IV)

Upon discovery of a degraded or nonconforming condition (e.g., an inoperable subsystem or a specified parameter outside normal limits) that results in a failure to meet a TS LCO, the licensee must perform the required actions specified for each applicable condition of the LCO's associated action requirements table. The licensee must perform these actions within the specified required action completion times. If the licensee does not resolve the degraded condition within the specified completion time for restoring operability (the allowed outage time), or returning the specified parameter to within limits, or fails to perform any other remedial action specified for the condition within the specified completion time, the LCO's associated action requirements usually require placing the unit in a condition that is outside the LCO's mode of applicability (typically, a unit shutdown) on a schedule defined by the associated specified completion times. The STSs contain standard completion times that are specified for similar conditions. For example, STSs specify 72 hours for restoring redundancy of a 2-train system, and 36 hours for placing the unit in cold shutdown (Mode 5).

Adopting completion times from the STSs is acceptable because standard completion times take into account the operability status of the redundant systems of TS required features, the capacity and capability of remaining features, a reasonable time for repair or replacement of required features, and the low probability of a design basis accident (DBA) occurring during the repair period. These reasons apply to the relaxation of MP2 TS required action completion times proposed in the present application. The staff finds that these changes are consistent with STSs and will not adversely impact plant safety. Therefore, changes identified as Category IV are acceptable.

3.3.6 Relaxation of a Limiting Condition for Operation (Category V)

As a consequence of relocating boration subsystem specifications to the TRM, the charging pump operability requirements of TS 3.5.2 are reduced. An operable charging pump will continue to be necessary for the operability of the associated ECCS subsystem in Modes 1, 2, and 3 with pressurizer pressure at or above 1750 psia. However, a charging pump must be capable of performing its manual start and RCS injection function to be considered operable. In the present application, the charging pump function to automatically start and inject borated water from the boric acid storage tanks into the RCS on a safety injection actuation signal (SIAS) is relocated to the TRM, and is no longer required for meeting LCO 3.5.2. This change is acceptable because the charging pump modified operability requirement provides additional RCS injection capability consistent with the design philosophy of defense-in-depth. Maintaining this modified LCO for the charging pumps goes beyond what is required by regulation, in that the accident analyses for MP2 take no credit for its function, and neither the MP2 probabilistic risk assessment (PRA) nor operating experience shows its function to be significant to public health and safety. The licensee stated in its application that the PRA only credits manually starting charging pumps in the beyond-design basis events of anticipated transient without scram, and complete loss of secondary heat sink. The PRA does not show the charging pumps' manual reactor coolant system (RCS) injection function to be risk-significant. The staff finds that this relaxation of LCO 3.5.2, in conjunction with the relocation of the boration subsystems, will not adversely impact plant safety. Therefore, changes identified as Category V are acceptable.

3.3.6 Less Restrictive Changes (Specific) Summary Conclusion

For the reasons presented previously, the NRC staff finds that the proposed less restrictive requirements will not adversely impact the safe operation of the plant. The resulting TS requirements are consistent with current licensing practices and operating experience, and provide reasonable assurance that public health and safety will be protected. Therefore, the proposed L-type changes, as described in Table 1, are acceptable.

3.4 Less Restrictive Changes (Generic)

When requirements have been shown to give little or no benefit, removing them from the TSs may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Group comments on STSs. The NRC staff reviewed generic relaxations contained in STSs and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. A number of the proposed changes to the MP2 TSs involved the removal of specific requirements and detailed information from individual specifications. The NRC staff evaluated each of these changes under one of the following four LA-change types:

Type 1 - Details of System Design and System Description Including Design Limits

Type 2 - Procedural Details for Meeting TS Requirements

Type 3 - Post Maintenance Testing and Inspection Requirements

Type 4 - Requirements to Cycle Remote, Power, or Automatically Operated Valves

The following discussions address why each of the four types of information or specific requirements may be moved from the TSs and placed in licensee-controlled documents.

3.4.1 Details of System Design and System Description Including Design Limits (Type 1)

The design of the facility is required to be described in the safety analysis report (SAR) by 10 CFR 50.34. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 require that plant design be documented in controlled procedures and drawings, and maintained in accordance with an NRC-approved QA plan (referenced in the FSAR). In 10 CFR 50.59, the NRC has specified controls for changing the facility as described in the FSAR, and in 10 CFR 50.54(a), the NRC has specified controls for changing the QA plan. The MP2 TS Bases also contain descriptions of system design (although not to the extent found in the STSs). The MP2 TS 6.23 specifies controls for changing the Bases. Removing details of system design and description from the TSs is acceptable because no reduction in the operational restrictions afforded by the affected specifications results. The removed information will be adequately controlled in the FSAR, controlled design documents and drawings or the TS Bases, as appropriate. The NRC staff finds that these kinds of changes will not adversely affect safe operation of the plant. Therefore, Type 1 changes are acceptable.

3.4.2 Procedural Details for Meeting TS Requirements (Type 2)

Details for performing actions and SRs are more appropriately specified in the plant procedures required by TS 6.8.1, the FSAR, the IST program, and the TS Bases. For example, control of the plant conditions appropriate to perform a surveillance test is an issue for procedures and scheduling and has previously been determined to be unnecessary as a TS restriction. As indicated in Generic Letter 91-04, allowing this procedural control is consistent with the vast majority of other SRs that do not dictate plant conditions for surveillances. Prescriptive procedural information in an action requirement is unlikely to contain all procedural considerations necessary for the plant operators to complete the actions required, and referral to plant procedures would be required in any event. Other changes to procedural details include those associated with the surveillance acceptance criteria of specified SSCs. For instance, the present application proposes to move acceptance criteria values from IST SRs for HPSI, LPSI, CS, AFW, and charging pumps to IST program documents. In another example, two TS SRs contain details for conducting leak testing of systems that penetrate containment. In the event of an accident, these systems could contain highly contaminated water. Leakage from these systems to the surrounding space could bypass containment and release radioactivity to the environment. Limiting this leakage to within assumed values is the purpose of TS 6.13, “System Integrity Program.” The leak test SRs fall within Type 2 because they are essentially procedural details for implementing TS 6.13.

The removal of these kinds of procedural details from the TSs does not reduce the restrictions on unit operation specified by the associated existing TS requirements. Any changes to these

details will be adequately controlled by 10 CFR 50.59 (for specified procedures and the FSAR), the TS Bases control program, 10 CFR 50.55a (for the IST program), and TS 6.13, as appropriate. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. The NRC staff finds that the proposed removal of procedural details for meeting TS requirements, which are listed and described in Table 1, from the MP2 TSs will not have an adverse effect upon the safe operation of the plant. Therefore, Type 2 changes are acceptable.

3.4.3 Post-Maintenance Testing and Inspection Requirements (Type 3)

Any time the operability of a TS-required component or system has been affected by maintenance (e.g., repair or replacement of a component), appropriate post-maintenance tests must be performed to demonstrate operability of the system or component. For some TS-required components and systems, the MP2 TSs contain specific post-maintenance SRs. In the TSs, all SRs associated with a TS-required component or system must usually be met to consider the component or system operable (TSs typically specify a few exceptions, however). This means that appropriate testing following maintenance must include satisfying the SRs in order to return the affected equipment to an operable status. Explicit post-maintenance SRs are not necessary to ensure the performance of appropriate testing following maintenance on TS-required equipment. The TRM and plant procedures for conducting maintenance, as applicable, will continue to implement the TS requirement that all specified SRs for a specified SSC must be met in order to consider the associated SSC operable (see TSs 4.0.3 and 4.0.4, and associated Bases). The provisions of 10 CFR 50.59 will ensure adequate control of any changes to the translated post-maintenance test requirements contained in the procedures required by TS 6.8.1. The NRC staff finds that the proposed removal of the post-maintenance test requirements, which are listed and described in Table 1, from the MP2 TSs will not have an adverse effect upon the safe operation of the plant. Therefore, Type 3 changes are acceptable.

3.4.4 Requirements to Cycle Remote, Power, or Automatically Operated Valves (Type 4)

The MP2 IST program implements the requirements of TS 4.0.5 and 10 CFR 50.55a for valve testing. The MP2 TS SRs for valve cycling are redundant to IST program test requirements for valves. The TS surveillances for the ECCS and CS valves are in two frequency groups: “automatically operated” valves that are testable during plant operation have a 31-day test interval; and “power operated” valves that are not testable have an 18-month interval. The AFW system TS specifies a 31-day frequency for testable “remote operated” valves; however, there are no valves in the AFW system that are not testable during plant operation.

The licensee proposed removing the explicit valve cycle SRs from the ECCS, CS, and AFW specifications, and also the 31-day frequency. Therefore, the 92-day ITS program frequency will apply. (This change represents a frequency relaxation for testable valves, and is addressed in the preceding discussion of L-type changes.) However, the 18-month interval does not change because the non-testable valve frequency in the IST program is the same.

Removing these explicit SRs, which is consistent with STSs, is appropriate because TS 4.0.5 requires IST in accordance with 10 CFR 50.55a, and the valves included in the scope of both the TS requirements and the IST program requirements are the same. In addition, for any of these subsystems to be operable, the TS definition of operability requires all the subsystem’s remote, power, or automatically operated valves to be operable. Being capable of cycling is necessary for valve operability. The NRC staff concludes that the proposed reliance on the TS

definition of operability, TS 4.0.5, and the IST program to ensure adequate cycle testing of the remote, power, and automatically operated valves in the ECCS, CS, and AFW systems, as applicable, will not reduce or adversely impact the capability of these valves to perform their intended safety function in the event of a DBA that requires these systems to function. Thus, moving these valve test requirements to the IST program has no impact on the safe operation of the plant. Changes to these translated valve testing requirements will be adequately controlled by 10 CFR 50.55a and the NRC-approved IST program. Therefore, Type 4 changes, which are described in Table 1, are acceptable.

3.4.5 Less Restrictive Changes (Generic) Summary Conclusion

The NRC staff concludes that these four types of detailed information and specific requirements are not necessary to ensure the effectiveness of the MP2 TSs to adequately protect the health and safety of the public. Accordingly, these requirements may be moved to one of the following licensee-controlled documents for which changes are adequately governed by a regulatory or TS requirement: (1) FSAR controlled by 10 CFR 50.59; (2) TRM controlled by 10 CFR 50.59; (3) site procedures controlled by 10 CFR 50.59; (4) TS Bases controlled by the TS Bases control program (TS 6.23), the IST program controlled by TS 4.0.5 and 10 CFR 50.55a; and (5) QA plans as approved by the NRC and referenced in the FSAR and controlled by 10 CFR Part 50, Appendix B and 10 CFR 50.54(a). For each of these LA-type changes, Table 1 also lists the licensee-controlled documents and the TS or regulatory requirements governing changes to those documents.

3.5 Relocated Specifications

A facility's TSs are required to contain LCOs for SSCs, and for parameters and system configurations with functions, values, or conditions that satisfy one or more of the four criteria of 10 CFR 50.36(c)(2)(ii). Under 10 CFR 50.59, a licensee may reanalyze its facility's accident and transient analyses and determine that part or all of an existing LCO no longer meets Criteria 1, 2, and 3. In addition, if a facility's current PRA or operating experience shows that an LCO-specified SSC's function is not significant to public health and safety, then the SSC's function may not satisfy Criterion 4, either. According to the Final Policy Statement, LCOs that do not satisfy or fall within any of the four criteria of 10 CFR 50.36(c)(2)(ii) may be relocated from the TSs (an NRC-controlled document) to appropriate licensee-controlled documents.

The NRC staff reviewed the reactivity control system related TSs proposed for relocation from the MP2 TSs against the 10 CFR 50.36 criteria. These specifications include the LCOs and associated actions and SRs. The TRM is an acceptable location for these requirements because the TRM is incorporated by reference into the MP2 FSAR. Accordingly, the requirements of 10 CFR 50.59 will apply to any changes the licensee proposes in these relocated requirements, thereby assuring adequate control of such changes. In addition, the licensee will continue to implement these relocated requirements in accordance with approved MP2 procedures for unit operation, maintenance, surveillance, test, and work control, as appropriate.

3.5.1 Relocation of Boration System Specifications

The licensee proposed to relocate the following specifications in TS Section 3/4.1.2, "Reactivity Control Systems - Boration Systems," to the MP2 TRM:

3/4.1.2.1, Flow Paths - Shutdown	3/4.1.2.5, Boric Acid Pumps - Shutdown
3/4.1.2.2, Flow Paths - Operating	3/4.1.2.6, Boric Acid Pumps - Operating
3/4.1.2.3, Charging Pumps - Shutdown	3/4.1.2.7, Borated Water Sources - Shutdown
3/4.1.2.4, Charging Pumps - Operating	3/4.1.2.8, Borated Water Sources - Operating

The boration system is a part of the chemical and volume control system and is required to control the chemical neutron absorber (boron) concentration in the RCS and to help maintain the shutdown margin within the limits specified in TSs 3/4.1.1.1, "Boration Control," and TS 3/4.1.1.2, "Shutdown Margin - Tavg $\geq$ 200 °F," and the Core Operating Limits Report. Accomplishing these functions requires a source of borated water, one or more flow paths to inject this borated water into the RCS, and charging pumps capable of providing the necessary injection flow against RCS pressure. Therefore, the boration system ensures that negative reactivity control is available during all facility operational modes, defined in TS 1.4, "Operational Modes - Modes," and TS Table 1.1.

On an SIAS, either pressurizer low-pressure or containment high-pressure or both, the two boric acid pumps transfer concentrated boric acid from the boric acid storage tanks directly to the charging pump suction header. Should the boric acid pumps fail to start automatically, an additional line is provided for gravity-feeding concentrated boric acid from the storage tanks to the charging pump suction header. Also, on an SIAS, all three charging pumps are started (normally, one of these three pumps will already be running) and pump concentrated boric acid into the RCS. Although the boration subsystems and charging pumps are designed to automatically perform the accident mitigation function of boration on an SIAS, the licensee has determined through analysis that they are not needed to perform this function for events for which the analyses credit an SIAS.

In its application of May 7, 2002, the licensee stated that the MP2 revised analyses of the design basis large and small break loss of coolant accidents (LOCAs) do not credit safety injection into the RCS from the three charging pumps, which have a combined capacity of approximately 128 gallons per minute. The revised LOCA analyses also do not credit boron injection into the RCS from the boric acid storage tanks by the charging pumps. These analyses are described in the MP2 FSAR, Section 14.6, "Loss of Coolant Accidents Resulting from a Spectrum of Postulated Piping Breaks Within the Reactor Coolant Pressure Boundary." The licensee indicated that the PRA for MP2 does not model the automatic boration and safety injection functions of the charging pumps; thus the PRA does not show these functions to be significant to public health and safety. In addition, the licensee reported no operating experience with the charging pumps to indicate otherwise.

The NRC staff reviewed the FSAR Chapter 14 descriptions of the accidents analyzed for MP2, and verified that for the LOCAs, the analyses do not assume operation of the boration system and charging pumps. In addition, all other accident analyses that model boron injection do not credit injection by the charging pumps from the boric acid storage tanks; rather, the analyses model boron injection by the HPSI system from the refueling water storage tank (RWST).

In its application of May 7, 2002, the licensee stated that the MP2 PRA does model manual actuation of charging pumps to supply water from the RWST to the RCS for the beyond-design bases events of (1) anticipated transient without scram (ATWS), and (2) complete loss of secondary heat sink. The licensee indicated that the PRA showed that this manual actuation function is risk-significant. Subsequent to the licensee's initial application, however, the licensee's updated PRA showed that this manual charging function is not risk-significant. Based on this, and the lack of operating experience with the charging pumps to the contrary, the NRC staff finds that the charging pump manual function is also not significant to public health and safety.

Based on its review of the licensee's application and the MP2 licensing basis as described in the FSAR, the NRC staff finds that the boration subsystems and the charging pumps (1) are not installed instrumentation; (2) are not design features with operating restrictions that are initial conditions of any MP2 design basis LOCA analysis "that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;" and (3) "are not part of the primary success path" and do not "function or actuate to mitigate" an MP2 design basis LOCA "that either assumes the failure of or presents a challenge to the integrity of a fission product barrier;" and (4) have not been shown by operating experience or PRA to be "significant to public health and safety."

The NRC staff concludes that the boration subsystems do not meet the four criteria in 10 CFR 50.36. They are not needed to obviate the possibility that an abnormal situation or event will give rise to an immediate threat to the public health and safety. Accordingly, as stated in the NRC Final Policy Statement, the specifications for the boration subsystems may be relocated from the TSs to a licensee-controlled document. Therefore, relocation of these specifications to the MP2 TRM is acceptable. Any change to these former requirements regarding the boron subsystems, as relocated to the TRM, will require an evaluation pursuant to 10 CFR 50.59. Such an evaluation will ensure that any change to these former requirements is adequately assessed for its impact on plant safety and the MP2 licensing basis, and whether NRC prior review and approval, pursuant to 10 CFR 50.90, is required.

3.6 Charging Pump Requirements Retained in TS 3/4.5.2

Although the automatic boron injection function of the charging pumps is relocated to the TRM, the licensee elected to retain the requirement of TS 3.5.2 that for an ECCS subsystem to be operable, it must include an operable charging pump "in order to provide margin for future changes," as stated in the revised TS Bases for TS 3.5.2. For a charging pump to be operable to meet TS 3.5.2, it must be capable of being manually started and charging borated water into the RCS. The NRC staff finds that requiring the charging pumps to be capable of this function is conservative, and may be considered a "defense-in-depth" measure that supports the modeling of this function in the PRA for the beyond-design bases events of ATWS and complete loss of secondary heat sink. The revised TS Bases also clarify that the charging pump boration flow paths are not required to be operable to meet TS 3.5.2. Lastly, the licensee proposed to make explicit, as TS 4.5.2.e, the surveillance to verify the flow rate of the charging pumps in accordance with the IST program and TS 4.0.5. These retained requirements for the charging pumps are conservative, and provide additional assurance of their availability for accident and transient mitigation. Therefore, they are acceptable.

3.7 MP2 TS Index Pages

Included with this application is a revision to MP2 TS index page IV to reflect the changes made to the TSs. This page change is administrative and acceptable.

3.8 MP2 TS Bases

The licensee proposed to move the TS Bases along with the relocation of the associated boration system specifications, to the MP2 TRM. In addition, the licensee proposed conforming changes to the Bases for the specifications revised in this amendment. The NRC staff has no objection to these Bases changes.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Connecticut 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 SRs. 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 40021). 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.

Principal Contributor: C. Craig Harbuck

Date: September 9, 2004

Attachment: Table 1 - Description of Changes to the Millstone Power Station, Unit No. 2 Technical Specifications

Table 1 - Description of Changes to the Millstone Power Station, Unit No. 2 Technical Specifications

Row No.	Change Type	Attachment 1 Change and/or Page Number	Affected Existing Specifications	Corresponding Revised/Equivalent Specifications	Description of Change
1	A	3.1.1.3 - 1 3.1.1.3 - 2 3.1.1.3 - 3 3.1.1.3 - 4 page 32	3.1.1.1 3.1.1.1 Action 3.1.2.3 3.1.2.4 Note **	3.1.1.3.a 3.1.1.3 Action a 3.1.1.3.b 3.1.1.3 Action b	Move the restriction of no more than two charging pumps capable of injection into the RCS when RCS temperature is below 300°F from relocated TS 3.1.2.3 (in Modes 5 and 6) and TS 3.1.2.4 Note ** (in Mode 4) to TS 3.1.1.3 (which is applicable in all Modes), and renumber the LCO and Actions.
2	A	3.1.1.3 - 5	4.1.1.3 4.1.1.3 Note *	4.1.1.3.1 4.1.1.3.1 Note *	Renumber TS 4.1.1.3 as TS 4.1.1.3.1, and change its reference in Note * to match.
3	A	3.1.1.3 - 6	4.1.2.3.2 4.1.2.4.2	4.1.1.3.2	The two surveillance requirements in relocated TSs 3/4.1.2.3 and 3/4.1.2.4 to demonstrate once per 12 hours that one (of the three) charging pumps is not capable of injecting into the RCS, in Modes 5 and 6 for TS 4.1.2.3.2, and in Mode 4 whenever RCS temperature is below 300°F for TS 4.1.2.4.2, are retained as a single surveillance in TS 4.1.1.3.2.
4	R	page 7 pages 27 - 32 * 3.5.2 - 2 * 3.5.2 - 6.b * 3.5.2 - 7 * 3.5.2 - 22	3/4.1.2.1 3/4.1.2.5 3/4.1.2.2 3/4.1.2.6 3/4.1.2.3 3/4.1.2.7 3/4.1.2.4 3/4.1.2.8 * 3.5.2.d * 4.5.2.a.3.a * 4.5.2.a.4.a & b * 4.5.2.g	Not Applicable	The existing specifications in TS Section 3/4.1.2 “Boration Systems” are relocated to the TRM, for which changes will be governed by 10 CFR 50.59, except as discussed in Rows 1 and 3 of this table. * Note that the boration system requirements and charging pump requirements related to boration in existing Specifications 3.5.2.d, 4.5.2.a, and 4.5.2.g, are also moved to the TRM as part of this relocation. The charging pumps’ automatic start function, which is no longer required, is also relocated, but not the charging pump IST requirements.

L-type Change Categories
- I Relaxation of an SR Frequency
- II Deletion of a Redundant SR
- III Relaxation of an SR Acceptance Criterion
- IV Relaxation of a Required Action Completion Time
- V Relaxation of an LCO

LA-type Change Types
- 1 Details of System Design and System Description Including Design Limits
- 2 Procedural Details for Meeting TS Requirements
- 3 Post Maintenance Testing and Inspection Requirements
- 4 Requirements to Cycle Remote, Power, or Automatically Operated Valves

Table 1 - Description of Changes to the Millstone Power Station, Unit No. 2 Technical Specifications

Row No.	Change Type	Attachment 1 Change and/or Page Number	Affected Existing Specifications	Corresponding Revised/Equivalent Specifications	Description of Change
5	LA Type 1	3.5.2 - 1 page 32	3.5.2	3.5.2	Remove the phrase “separate and independent” from the LCO statement. This design detail is discussed in the FSAR, for which changes are governed by 10 CFR 50.59.
6	LA Type 1	3.5.2 - 2 page 33	3.5.2 3.5.2.a 3.5.2.b 3.5.2.c	3.5.2	Remove from the LCO statement, starting with the phrase “with each subsystem comprised of:” the list of components and flowpaths contained in an ECCS subsystem, and place this design information in the Bases for TS 3/4.5.2. Changes to this information are governed by TS 6.23 “Bases Control Program”
7	LA Type 1	3.5.2 - 2	3.5.2.d	3.5.2	The requirement for an ECCS subsystem to include “one operable charging pump with a separate and independent operable flow path from an operable boric acid storage tank via either an operable boric acid pump or a gravity feed connection” is moved to the TRM along with the boration system specifications from TS Section 3/4.1.2.
8	L Category V	3.5.2 - 2	3.5.2.d	3.5.2	The LCO requirement that each ECCS subsystem include an operable charging pump is relaxed by moving to the TRM the requirement that the charging pump automatically start on an SIAS.
9	L Category IV	3.5.2 - 3 Page 33	3.5.2 Action a	3.5.2 Action a	The time allowed for restoring an inoperable ECCS subsystem to operable status is increased from 48 hours to 72 hours.

L-type Change Categories
- I Relaxation of an SR Frequency
- II Deletion of a Redundant SR
- III Relaxation of an SR Acceptance Criterion
- IV Relaxation of a Required Action Completion Time
- V Relaxation of an LCO

LA-type Change Types
- 1 Details of System Design and System Description Including Design Limits
- 2 Procedural Details for Meeting TS Requirements
- 3 Post Maintenance Testing and Inspection Requirements
- 4 Requirements to Cycle Remote, Power, or Automatically Operated Valves

Table 1 - Description of Changes to the Millstone Power Station, Unit No. 2 Technical Specifications

Row No.	Change Type	Attachment 1 Change and/or Page Number	Affected Existing Specifications	Corresponding Revised/Equivalent Specifications	Description of Change
10	A	3.5.2 - 3 Page 33	3.5.2 Action a	3.5.2 Action a	The current action to “be in Hot Shutdown within the next twelve hours” is replaced with an equivalent set of actions, which are more consistent with the Applicability of TS 3/4.5.2. That is, to “be in Hot Standby within the next 6 hours and reduce pressurizer pressure to less than 1750 psia within the following 6 hours.”
11	A	3.5.2 - 3	TS Page 3/4 5-3	TS Page 3/4 5-3	Add the phrase “Amendment No. 52" to bottom of page to indicate the latest revision to the page.
12	L Category I	Page 34 3.5.2 - 4.a 3.5.2 - 5.a 3.5.2 - 6.a 3.5.2 - 8 3.5.2 - 9 3.5.2 - 10 3.5.2 - 11 3.5.2 - 12 3.5.2 - 13	- 4.5.2.a.1.b & a 4.5.2.a.2.b & a 4.5.2.a.3 & 4.0.5 4.5.2.a.5 4.5.2.a.6 4.5.2.a.7 4.5.2.a.8 4.5.2.a.9 4.5.2.a.10	- 4.5.2.c & g 4.5.2.d & g 4.5.2.e & 4.0.5 4.5.2.f 4.0.5 4.5.2.a 4.5.2.a 1.6 Operable 4.5.2.b	Deletion of staggered testing of ECCS subsystems 1. HPSI pumps 2. LPSI pumps 3. Charging pumps 4. Containment sump isolation valve 5. ECCS automatic motor-operated valves - cycle 6. ECCS manual valves - position 7. ECCS automatic power operated valves - position 8. Electrical power alignment for ECCS subsystems 9. Selected ECCS power operated valves - position
13	L Category I	3.5.2 - 4.a 3.5.2 - 5.a 3.5.2 - 6.a Page 34	4.5.2.a.1.b & a 4.5.2.a.2.b & a 4.5.2.a.3	4.5.2.c 4.5.2.d 4.5.2.e	Relax 31-day ECCS pump surveillance intervals to “when tested pursuant to Specification 4.0.5,” which means 92 days provided test history is supportive.
14	A	3.5.2 - 6.a	4.0.5	4.0.5 & 4.5.2.e	Make explicit the flow test for the charging pumps already required by TS 4.0.5, Inservice Testing.

L-type Change Categories
- I Relaxation of an SR Frequency
- II Deletion of a Redundant SR
- III Relaxation of an SR Acceptance Criterion
- IV Relaxation of a Required Action Completion Time
- V Relaxation of an LCO

LA-type Change Types
- 1 Details of System Design and System Description Including Design Limits
- 2 Procedural Details for Meeting TS Requirements
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Table 1 - Description of Changes to the Millstone Power Station, Unit No. 2 Technical Specifications

Row No.	Change Type	Attachment 1 Change and/or Page Number	Affected Existing Specifications	Corresponding Revised/Equivalent Specifications	Description of Change
15	L Category 1	3.5.2 - 4.b 3.5.2 - 5.b	4.5.2.a.1.a 4.5.2.a.2.a	4.5.2.g 4.5.2.g	Combine the HPSI & LPSI pump automatic start function test into one surveillance and relax the 31-day test interval to 18 months.
16	L Category III	3.5.2 - 4.b 3.5.2 - 5.b	4.5.2.a.1.a 4.5.2.a.2.a	4.5.2.g 4.5.2.g	Revises surveillance requirements of the HPSI and LPSI pumps to verify the capability to automatically start on an actuation signal, by allowing actual signals as well as simulated (or test) signals to be credited for meeting the surveillance.
17	LA Type 2	3.5.2 - 4.c 3.5.2 - 5.c Page 34	4.5.2.a.1.b 4.5.2.a.2.b	4.5.2.c 4.5.2.d	Move HPSI & LPSI pump flow / head test acceptance criteria values to IST Program document, for which changes are controlled by 10 CFR 50.55a.
18	L Category III	3.5.2 - 4.d 3.5.2 - 5.d 3.5.2 - 6.d	4.5.2.a.1.c 4.5.2.a.2.c 4.5.2.a.3.b	None	Delete explicit requirement for HPSI, LPSI, & charging pumps to operate for 15 minutes following automatic start during flow / head test. Rely on IST program guidance to ensure sufficient run time for reliable data.
19	M	3.5.2 - 8	4.5.2.a.5	4.5.2.f	Renumber surveillance to verify containment sump isolation valves open on a sump recirculation actuation signal. Replaced reference to specific actuation signal, valves, and actuated position with “verifying each ECCS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position.” This will require testing more valves than the sump isolation valves; so it is more restrictive.

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LA-type Change Types
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20	L Category I	3.5.2 - 8	4.5.2.a.5	4.5.2.f	Relaxed frequency of actuation test of ECCS automatic valves from 31 days to 18 months.
21	L Category III	3.5.2 - 8	4.5.2.a.5	4.5.2.f	Revises surveillance requirement of ECCS automatic valves to verify the capability to automatically change position on an actuation signal, by allowing actual signals as well as simulated (or test) signals to be credited for meeting the surveillance.
22	M	3.5.2 - 5.e Page 35	None	4.5.2.h	Add an18-month test interval surveillance to verify that each LPSI pump stops automatically on an actual or simulated actuation signal.
23	LA Type 4	3.5.2 - 9 page 4 pages 34 - 35	4.5.2.a.6	4.0.5	Move the requirement to cycle “each testable, automatically operated [ECCS] valve through at least one complete cycle” at least once per 31 days, to IST program documents. The IST program is controlled by 10 CFR 50.55a.
24	L Category I	3.5.2 - 9 page 4 pages 34 - 35	4.5.2.a.6	4.0.5	Relax 31-day test interval for surveillance requirement to cycle each ECCS testable, automatically operated valve in each ECCS subsystem to once every 92 days provided the test can be accomplished during power operations, or at least once every 18 months for valves that can only be tested during shutdown conditions.

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25	A	3.5.2 - 10 3.5.2 - 11	4.5.2.a.7 4.5.2.a.8	4.5.2.a 4.5.2.a	Combine valve position verification surveillances for manual, power operated, and automatic ECCS valves into a single surveillance requirement. The 31-day surveillance interval is retained.
26	L Category II	3.5.2 - 12 page 36	4.5.2.a.9	1.6 Operable	Deletes explicit 31-day surveillance to verify the required electrical power alignment for ECCS subsystems to be operable. This is redundant to the definition of Operable.
27	A	3.5.2 - 13	4.5.2.a.10	4.5.2.b	Renumber surveillance to verify required status of three ECCS valves at least once per 31 days.
28	LA Type 3	3.5.2 - 14 page 36	4.5.2.b	None	Move requirement to visually inspect containment for loose debris, which could cause restrictions of ECCS pump suctions if transported to the containment sump during LOCA conditions, to the TRM. This is a procedural detail included in any surveillance or maintenance activity requiring containment entry. Changes to such procedural details for establishing and maintaining operability of ECCS pump suction flow paths from containment will be governed by 10 CFR 50.59.
29	L Category III	3.5.2 - 15	4.5.2.c.1	4.5.2.k	Renumber surveillance to verify operability of automatic interlock that prevents opening the shutdown cooling system's RCS suction valves above an RCS pressure signal at or above 300 psia, and allows an actual signal as well as simulated (or test) signal to be credited for meeting the surveillance.

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30	A	3.5.2 - 16	4.5.2.c.2	4.5.2.j	Renumber surveillance to visually inspect the containment sump to verify it is free of obstructions and that sump components show no evidence of structural distress or corrosion. The revised surveillance adds the word 'abnormal' to modify the word 'corrosion' to clarify the intent of the existing requirement.
31	A	3.5.2 - 17	not applicable	not applicable	Delete references to previously deleted requirements 4.5.2.c.3 and 4.5.2.c.4 on existing TS page 3/4 5-5.
32	LA Type 2	3.5.2 - 18 page 36	4.5.2.c.5	6.13	Move requirement to verify total leak rate of HPSI system discharge and suction lines outside containment to "Systems Integrity" program document. This program is a plant-specific requirement controlled by TS 6.13 "Systems Integrity," which includes a requirement for determining leakage of safety injection lines outside containment on the same 18-month frequency.
33	M	3.5.2 - 18	4.5.2.c.5	6.13	By specifying the leakage determination requirement for HPSI lines outside containment through TS 6.13, the provisions of TS 4.0.2 regarding the 25% interval extension and TS 4.0.3 regarding the delay in taking action requirements to allow time to perform a missed (overdue) surveillance no longer apply. This reduction in scheduling flexibility is more restrictive.

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34	LA Type 4	3.5.2 - 19 page 4 pages 34 - 35	4.5.2.d	4.0.5	Move requirement to cycle each ECCS subsystem power operated valve in each flow path not testable during unit operation at least once per 18 months, to IST program documents. The IST program is controlled by 10 CFR 50.55a.
35	A	3.5.2 - 20.a 3.5.2 - 20.c	4.5.2.e.1 4.5.2.e.3	4.5.2.i.1 4.5.2.i.2	Renumber requirements to verify position stop of ECCS injection valves listed in Table 4.5-1 within 4 hours after valve operations (valve stroking), and at least once per 18 months.
36	LA Type 3	3.5.2 - 20.b	4.5.2.i.2	None	Move requirement to verify position stop of ECCS injection valves, that are listed in Table 4.5-1, following maintenance, repair, or replacement of the valve, its actuator, or its control circuit, to maintenance procedures. Changes to these procedures, which are required by TS 6.8.1, are controlled by 10 CFR 50.59.
37	LA Type 3	3.5.2 - 21 page 37	4.5.2.f	None	Move requirement to conduct a flow balance verification of the safety injection lines (HPSI and LPSI) following any system modification that could alter their flow characteristics, along with procedural details, to the TRM. Any changes to the post-modification verification test requirement and the flow balance procedural details will be controlled by 10 CFR 50.59.

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38	LA Type 1	3.5.3 - 1 page 33	3.5.3 3.5.3.a 3.5.3.b	3.5.3	The LCO for ECCS subsystems below 300°F is modified by moving the details of what the one required subsystem contains to the associated TS Bases, which is controlled by TS 6.23, and referring only to the HPSI subsystem.
39	A	3.5.3 - 2 page 33	3.5.3 footnotes **, ***, and ****.	3.5.3 Notes 1, 2, and 3	Move the LCO statement's footnotes on page 3/4 5-7 to right after the LCO statement, and renumber them.
40	L Category IV	3.5.3 - 3	3.5.3 Action a	3.5.3 Action a	In the event the one required HPSI subsystem is inoperable, one hour is allowed to restore it; otherwise the unit must be cooled down to Mode 5, Cold Shutdown (at or below 200°F) in 20 hours. The time allowed to be in Mode 5, from at most Mode 3 at 1750 psia pressurizer pressure, is relaxed to the standard time interval of 24 hours. The safety impact of the longer Completion Time, which is consistent with corresponding STS 3.5.3 Action B, is negligible and therefore is acceptable.
41	A	3.5.3 - 4 page 37	4.5.3.1	4.5.3.1	The TS to require performance of applicable surveillance requirements of Section 4.5.2 to demonstrate operability of the required HPSI subsystem is clarified by listing the specific surveillances.

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42	M	3.6.2.1 - 1 Page 33	3.6.2.1.Action a	3.6.2.1.Action a	Revise TS 3.6.2.1 Required Action a.1 (for the condition of one inoperable containment spray system train) to make it consistent with the Applicability of TS 3/4.6.2.1, and to replace the 12-hour time specified to be in Mode 4 (Hot Shutdown) with a 6-hour time to be in Mode 3, followed by a 6-hour time to reduce pressurizer pressure below 1750 psia, which exits the Applicability. In some shutdown scenarios, this change may be viewed as more restrictive because the time to reach Mode 3 is limited to 6 hours.
43	L Category I	Page 34 3.6.2.1 - 2.a 3.6.2.1 - 2.a 3.6.2.1 - 2.a 3.6.2.1 - 2.a 3.6.2.1 - 2.a 3.6.2.1 - 2.a 3.6.2.1 - 5	- 4.6.2.1.1.a.1 4.6.2.1.1.a.2 4.6.2.1.1.a.3 4.6.2.1.1.a.4 4.6.2.1.1.a.5 4.6.2.1.1.a.6 4.6.2.1.1.a.6	- moved from TSs 4.6.2.1.1.b Deleted 4.0.5 4.6.2.1.1.c 4.6.2.1.1.a 4.6.2.1.1.a	Deletion of containment spray (CS) staggered testing 1. CS pump flow test procedural detail for starting 2. CS pump flow test with ΔP acceptance criteria 3. CS pump flow test procedural detail for run time 4. Cycle automatically operated valves in CS flow paths 5. Test automatic alignment of CS to sump recirculation 6. Verify CS manual, remote, and automatic valves (that are not secured in position) in the flow path are aligned to RWST
44	L Category I	3.6.2.1 - 2.a	4.6.2.1.1.a.2	4.6.2.1.1.b	Relax 31-day test interval for CS pump flow test to “when tested pursuant to Specification 4.0.5,” which means 92 days provided test history is supportive.
45	LA Type 2	3.6.2.1 - 2.b	4.6.2.1.1.a.1	None	Remove requirement to start CS pump from control room on the pump flow test. The FSAR, which is controlled by 10 CFR 50.59, describes CS system operation.

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46	L Category III	3.6.2.1 - 2.d	4.6.2.1.1.a.3	None	Delete explicit requirement for CS pumps to operate for 15 minutes following automatic start during flow / head test. Rely on IST program guidance to ensure sufficient run time for reliable data.
47	LA Type 2	3.6.2.1 - 2.c	4.6.2.1.1.a.2	4.6.2.1.1.b 4.0.5	Move CS pump flow / head test ΔP acceptance criteria to IST program document, required by TS 4.0.5. The IST program is controlled by 10 CFR 50.55a.
48	LA Type 4	3.6.2.1 - 3	4.6.2.1.1.a.4	4.0.5	Move requirement to cycle each CS system testable, automatically operated valve in each CS train flow path at least once per 31 days, to IST program documents. The IST program is controlled by 10 CFR 50.55a.
49	L Category I	3.6.2.1 - 3 pages 34 - 35	4.6.2.1.1.a.4	4.0.5	Relax 31-day test interval for surveillance requirement to cycle each CS system testable, automatically operated valve in each CS train flow path to once every 92 days provided the test can be accomplished during power operations, or at least once every 18 months for valves that can only be tested during shutdown conditions.

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50	M	3.6.2.1 - 4	4.6.2.1.1.a.5	4.6.2.1.1.c	Revise the surveillance to verify that upon a containment sump recirculation actuation signal the sump isolation valves open and a recirculation mode flow path through an operable shutdown cooling heat exchanger is established. Increase the number of valves addressed by this surveillance by restating it as "verifying each automatic containment spray valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal."
51	L Category I	3.6.2.1 - 4	4.6.2.1.1.a.5	4.6.2.1.1.c	Relax the 31-day frequency of the surveillance to verify the automatic opening of the CS system sump isolation valves, on a recirculation actuation signal, to 18 months.
52	L Category III	3.6.2.1 - 4	4.6.2.1.1.a.5	4.6.2.1.1.c	Relax the surveillance that requires verifying the automatic opening of the CS system sump isolation valves by allowing an actual signal as well as simulated (or test) signal to be credited for meeting the surveillance.
53	L Category II	3.6.2.1 - 4 page 36	4.6.2.1.1.a.5	4.6.2.1.1.c	Relax the surveillance that requires verifying that the sump isolation valves open on an actuation signal, by deleting the requirement to verify a recirculation mode flow path through an operable shutdown cooling heat exchanger is established. This flow path is adequately verified by the retained requirement to verify the required position of all unsecured valves in the CS system flow paths every 31 days (revised TS 4.6.2.1.1.a).

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54	A	3.6.2.1 - 5	4.6.2.1.1.a.6	4.6.2.1.1.a	Renumber surveillance that requires verifying the required position of all unsecured containment spray valves in the CS system flow paths every 31 days.
55	A	3.6.2.1 - 5 page 35	4.6.2.1.1.a.6	4.6.2.1.1.a	Revise the surveillance that requires verifying the required position of all unsecured valves in the CS system flow paths every 31 days by deleting the reference to “accessible” manual valves. This word is unnecessary because there are no manual valves in the flow paths for the CS system, which are not locked, sealed, or otherwise secured in position, that are inaccessible during power operation.
56	LA Type 4	3.6.2.1 - 6 page 35	4.6.2.1.1.b	4.0.5	Move requirement to cycle CS system power operated valves, which are not testable during plant operation, at least once per 18 months during shutdown to the IST program document. The IST program is controlled by 10 CFR 50.55a.
57	LA Type 2	3.6.2.1 - 7 page 36	4.6.2.1.1.c	6.13	Move requirement to verify total leak rate of CS system discharge and suction lines outside containment to “Systems Integrity” program document. This program is a plant-specific requirement controlled by TS 6.13 “Systems Integrity,” which includes a requirement for determining leakage of CS system lines outside containment on the same 18-month frequency.

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58	M	3.6.2.1 - 7	4.6.2.1.1.c	6.13	By specifying the leakage determination requirement for CS system lines outside containment through TS 6.13, the provisions of TS 4.0.2 regarding the 25% interval extension and TS 4.0.3 regarding the delay in taking action requirements to allow time to perform a missed (overdue) surveillance no longer apply. This reduction in scheduling flexibility is more restrictive.
59	L Category I	3.6.2.1 - 8	4.6.2.1.1.d	4.6.2.1.1.e	Relax the surveillance to verify that the containment spray system nozzles are not obstructed by increasing the test interval from 5 years to 10 years, which is consistent with STSs and Generic Letter 93-05.
60	LA Type 2	3.6.2.1 - 8	4.6.2.1.1.d	4.6.2.1.1.e	Move the prescriptive methods specified for verifying that the containment spray system nozzles are not obstructed to the Bases for TS 4.6.2.1.1.e. TS 6.23 controls changes to the Bases.
61	M	3.6.2.1 - 9 page 35	none	4.6.2.1.1.d	Add a surveillance to verify at least once per 18 months that each CS pump starts automatically on an actual or simulated actuation signal.
62	LA Type 2	3.6.2.1 - 10.a	4.6.2.1.2.a	4.6.2.1.2.a	Move the procedural information that specifies starting each containment air recirculation and cooling unit from the control room to the FSAR, which describes operation of this system. Changes to such information in the FSAR is controlled by 10 CFR 50.59.

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63	A	3.6.2.1 - 10.a 3.6.2.1 - 10.b	4.6.2.1.2.a 4.6.2.1.2.b	4.6.2.1.2.a	Retain the requirement to run each containment air recirculation and cooling unit in slow speed (same as low speed) for at least 15 minutes on a 31-day interval.
64	A	3.6.2.1 - 10.c	4.6.2.1.2.c	4.6.2.1.2.b	Renumber surveillance to verify cooling water flow rate to each containment air recirculation and cooling unit is at least 500 gpm on a 31-day interval.
65	L Category I	Page 34 3.6.2.1 - 10.d	- - 4.6.2.1.2.a 4.6.2.1.2.b 4.6.2.1.2.c	- - 4.6.2.1.2.a 4.6.2.1.2.a 4.6.2.1.2.b	Deletion of air recirculation and cooling system staggered testing. a. Start test b. Run test c. Cooling water flow rate verification
66	M	3.6.2.1 - 11 page 35	none	4.6.2.1.2.c	Add a surveillance to verify at least once per 18 months that each air recirculation and cooling unit starts automatically on an actual or simulated actuation signal.
67	L Category I	3.7.1.2 - 1.a Pages 34 - 35	 4.7.1.2.a.1 4.7.1.2.a.2.a 4.7.1.2.a.2.b 4.7.1.2.a.3 4.7.1.2.a.4 4.7.1.2.a.5 4.7.1.2.a.6	 - 4.7.1.2.b 4.7.1.2.b - - 4.7.1.2.a 4.7.1.2.a	Relax test interval for AFW system surveillances from 31 days to “when tested pursuant to Specification 4.0.5, which means 92 days provided test history is supportive. 1. Start each AFW pump from control room 2.a. Motor driven AFW pump flow / ΔP test 2.b. Turbine driven AFW pump flow / ΔP test 3. Each AFW pump runs for at least 15 minutes 4. Testable remote operated valve cycle test 5. Manual valve position verification 6. Remote operated valve position verification.

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68	LA Type 2	3.7.1.2 - 1.b	4.7.1.2.a.1	4.7.1.2.b	Move the procedural information that specifies starting each auxiliary feedwater (AFW) pump from the control room to the FSAR, which describes operation of the AFW system, Changes to such information in the FSAR are controlled by 10 CFR 50.59.
69	LA Type 2	3.7.1.2 - 1.c	4.7.1.2.a.2.a & b	4.7.1.2.b	Move AFW pump flow / head test ΔP acceptance criteria to IST program document, required by TS 4.0.5. The IST program is controlled by 10 CFR 50.55a.
70	M	3.7.1.2 - 1.d Page 37	4.7.1.2.a.2.b	4.7.1.2.b	Revise the existing exception to Specification 4.0.4 for entry into Mode 3 to permit performance of the turbine driven AFW pump flow / ΔP test in Mode 3 after secondary steam supply pressure exceeds the specified 800 psig, but before entering Mode 2. This exception is made more restrictive by requiring performance of the surveillance within 24 hours after reaching 800 psig in the steam generators, but still before entering Mode 2.
71	L Category III	3.7.1.2 - 1.e page 35	4.7.1.2.a.3	None	Delete explicit requirement for AFW pumps to operate for 15 minutes following automatic start during flow / head test. Rely on IST program guidance to ensure sufficient run time for reliable data.

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Table 1 - Description of Changes to the Millstone Power Station, Unit No. 2 Technical Specifications

Row No.	Change Type	Attachment 1 Change and/or Page Number	Affected Existing Specifications	Corresponding Revised/Equivalent Specifications	Description of Change
72	L Category I	3.7.1.2 - 2 page 35	4.7.1.2.a.4	4.0.5	Relax 31-day test interval for surveillance requirement to cycle each AFW system testable, remote operated valve [in each AFW flow path] to once every 92 days provided the test can be accomplished during power operations, or at least once every 18 months for valves that can only be tested during shutdown conditions.
73	LA Type 4	3.7.1.2 - 2	4.7.1.2.a.4	4.0.5	Move requirement to cycle each AFW system testable, remote operated valve [in each AFW flow path] at least once per 31 days, to IST program documents. The IST program is controlled by 10 CFR 50.55a.
74	A	3.7.1.2 - 3	4.7.1.2.a.5 4.7.1.2.a.6	4.7.1.2.a	Combine the two surveillance requirements that verify the correct position of each unsecured manual valve and each remote operated valve in the AFW system steam and water flow paths, on a 31-day interval, into a single surveillance requirement..
75	L Category I	3.7.1.2 - 4 page 38	4.7.1.2.b	4.7.1.2.e	Clarify the surveillance to conduct a flow test to verify the AFW system flow paths from the condensate storage tank to the steam generators “before entering Mode 3 after a Cold Shutdown (Mode 5) of at least 30 days,” by requiring this flow test “prior to entering Mode 2 whenever the unit has been in Mode 5, Mode 6, or defueled for a cumulative period of greater than 30 days, which is consistent with STS SR 3.7.5.5. This change is less restrictive because the test is allowed to be performed in Mode 3.

L-type Change Categories
- I Relaxation of an SR Frequency
- II Deletion of a Redundant SR
- III Relaxation of an SR Acceptance Criterion
- IV Relaxation of a Required Action Completion Time
- V Relaxation of an LCO

LA-type Change Types
- 1 Details of System Design and System Description Including Design Limits
- 2 Procedural Details for Meeting TS Requirements
- 3 Post Maintenance Testing and Inspection Requirements
- 4 Requirements to Cycle Remote, Power, or Automatically Operated Valves

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76	A	3.7.1.2 - 5	4.7.1.2.c.1	4.7.1.2.c	Clarify the surveillance that verifies each AFW system automatic valve in the flow path actuates to its correct position upon receipt of each AFW actuation signal, by adding the phrase “as designed” to account for the steam turbine driven pump having no automatic start feature. In addition, clarify that any automatic valves that are locked, sealed, or otherwise secured in position, are not required to be tested.
77	L Category III	3.7.1.2 - 5	4.7.1.2.c.1	4.7.1.2.c	Relax the surveillance to verify, at least once per 18 months during shutdown, that each AFW system automatic valve in the flow path actuates to its correct position upon receipt of each AFW actuation test signal. This surveillance is changed to allow an actual as well as a simulated signal to be credited as meeting the surveillance.
78	LA Type 2	3.7.1.2 - 5 3.7.1.2 - 6	4.7.1.2.c.1 4.7.1.2.c.2	4.7.1.2.c 4.7.1.2.d	The procedural requirement to perform the AFW system automatic valve actuation test and AFW pump automatic actuation test “during shutdown” is moved to plant procedures, which are controlled by 10 CFR 50.59.
79	L Category III	3.7.1.2 - 6	4.7.1.2.c.2	4.7.1.2.d	Relax the surveillance that verifies, at least once per 18 months during shutdown, that each AFW system pump starts automatically upon receipt of each AFW actuation test signal. This surveillance is changed to allow an actual as well as a simulated signal to be credited as meeting the surveillance.

L-type Change Categories
- I Relaxation of an SR Frequency
- II Deletion of a Redundant SR
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LA-type Change Types
- 1 Details of System Design and System Description Including Design Limits
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