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September 23, 2004

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

SUBJECT: License Amendment Request
End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation
(LAR 2004-15)
River Bend Station, Unit 1
Docket No. 50-458
License No. NPF-47

REFERENCES: Standard Technical Specifications General Electric Plants,
BWR/6-NUREG-1434 Vol. 1, Rev. 3

RBG-46325

Dear Sir or Madam:

Pursuant to 10 CFR 50.90, Entergy Operations, Inc. (Entergy) hereby requests the following amendment for River Bend Station, Unit 1 (RBS). The proposed change will revise the Operating License to allow revision of reactor operational limits, as specified in the RBS Core Operating Limits Report (COLR), to compensate for the inoperability of the End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation. This will provide an alternative to the existing Limiting Condition for Operation (LCO) for the EOC-RPT instrumentation. The revised TS will require that either the EOC-RPT instrumentation be operable or that Minimum Critical Power Ratio (MCPR) and Linear Heat Generation Rate (LHGR) limits for the inoperable EOC-RPT be placed in effect as specified in the COLR. Attachment 3 contains marked-up copies of the Technical Specification Bases for your information only.

The proposed change has been evaluated in accordance with 10 CFR 50.91(a)(1) using criteria in 10 CFR 50.92(c) and it has been determined that this change involves no significant hazards consideration. The bases for these determinations are included in the attached submittal.

The proposed change includes two new commitments as summarized in Attachment 4. The proposed change is consistent with NUREG-1434, *Standard Technical Specifications General Electric Plants, BWR/6*.

Entergy requests approval of the proposed amendment by August 1, 2005. Once approved, the amendment shall be implemented within 60 days. Although this request is neither exigent nor emergency, your prompt review is requested.

A001

If you have any questions or require additional information, please contact Bill Brice at 601-368-5076.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September 23, 2004.

Sincerely,



Paul D. Hinnenkamp
Vice President, Operations
River Bend Station

PDH/WBB

Attachments:

1. Analysis of Proposed Technical Specification Change
2. Proposed Technical Specification Changes (mark-up)
3. Changes to Technical Specification Bases Pages – For Information Only
4. List of Regulatory Commitments

cc: Mr. Bruce S. Mallett
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Attachment 1

RBG-46325

Analysis of Proposed Technical Specification Change

1.0 DESCRIPTION

This letter is a request to amend Operating License NPF-47 for River Bend Station, Unit 1 (RBS).

The proposed change will revise the Operating License to allow revision of reactor operational limits, as specified in the RBS Core Operating Limits Report (COLR), to compensate for the inoperability of the End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation. This will provide an alternative to the existing Limiting Condition for Operation (LCO) for the EOC-RPT instrumentation. The revised TS will require that either the EOC-RPT instrumentation be operable or that Minimum Critical Power Ratio (MCPR) and Linear Heat Generation Rate (LHGR) limits for the inoperable EOC-RPT be placed in effect as specified in the COLR.

2.0 PROPOSED CHANGE

RBS Technical Specification (TS) 3.3.4.1 "End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation," requires that:

Two channels per trip system for each EOC-RPT instrumentation function listed below shall be OPERABLE:

- a. Turbine Stop Valve (TSV) Closure; and
- b. Turbine Control Valve (TCV) Fast Closure, Trip Oil Pressure-Low.

These requirements are applicable any time thermal power is greater than or equal to 40% of rated thermal power (RTP) with any recirculation pump in fast speed. The proposed change will modify the LCO by incorporating an additional provision that allows the alternative of taking an MCPR and a LHGR penalty when the EOC-RPT instrumentation is inoperable. This change would add an alternative LCO which would state that, if the EOC-RPT function is INOPERABLE,

- b. LCO 3.2.2, "Minimum Critical Power Ratio (MCPR)," limits and LCO 3.2.3, "Linear Heat Generation Rate (LHGR)" for inoperable EOC-RPT as specified in the COLR are made applicable.

This LCO allows the imposition of a MCPR and LHGR operating penalty in lieu of the EOC-RPT to ensure adequate margin for the fuel thermal limits. The penalty is calculated using approved analytical methods, and will be documented in the COLR.

An additional action that addresses the new provision in the LCO is being added to CONDITION B as REQUIRED ACTION B.2. The new action invokes requirements to adjust the MCPR and LHGR limit within 2 hours of finding the instrumentation inoperable. The proposed change is consistent with NUREG-1434, *Standard Technical Specifications General Electric Plants, BWR/6*, except for the addition of the alternative LHGR limits.

The Bases will be revised to confirm that the alternative MCPR and LHGR operating limits are sufficient to mitigate pressurization transient effects and that the alternative limits restore the margin to the MCPR and LHGR assumed in the safety analysis.

In summary, this amendment allows revision of reactor operational limits, as specified in the River Bend Station Unit 1, Core Operating Limits Report, to compensate for possible inoperability of the End of Cycle Recirculation Pump Trip instrumentation. The revised TS will require that either the EOC-RPT instrumentation be operable or that MCPR and LHGR limits for the inoperable EOC-RPT be placed in effect as specified in the COLR. The proposed change is consistent with NUREG-1434, *Standard Technical Specifications General Electric Plants, BWR/6*, except for the addition of the alternative LHGR limits.

3.0 BACKGROUND

The EOC-RPT is intended to supplement the negative reactivity provided by the control rods at the end of a fuel cycle when rod worths are reduced due to core characteristics. Closure of the turbine stop valves (indicative of a turbine trip) or a fast closure of the turbine control valves (indicative of a load rejection) initiates a reactor scram and an EOC-RPT. The EOC-RPT is designed to trip the reactor recirculation pumps from main power supply and to initiate the low frequency motor generator automatic transfer sequence. This results in a downshift in speed of the pumps. This inserts negative reactivity and assists the control rods to keep the core within the thermal-hydraulic safety limits during operational transients. The Recirculation Flow Control System is described in Section 7.7.1.2 of the RBS UFSAR and the associated instrumentation is discussed in Section 7.6.1.1.

When River Bend Station (RBS) and Grand Gulf Nuclear Station (GGNS) adopted the improved Technical Specifications, the option to adopt the alternative compliance method was not deemed necessary. Subsequently, GGNS experienced an unplanned shutdown and was prohibited from returning to full power because of the EOC-RPT LCO restrictions. GGNS asked for and received an emergency change to the TS (TAC NO. MB2595). That situation demonstrated the need for a TS change for RBS to prevent a similar situation.

4.0 TECHNICAL ANALYSIS

The EOC-RPT instrumentation initiates a reactor recirculation pump downshift to low speed in order to reduce the peak reactor pressure and power resulting from a turbine trip or generator load rejection transient. This helps insure adequate margin to protect the reactor core thermal MCPR Safety Limits and the thermal mechanical design limits. The trip is used to quickly insert additional negative reactivity into the core during the period at the beginning of a transient. This occurs because the coolant void fraction (the relative amount of steam vs. liquid water) in the core rises, reducing neutron moderation and therefore reducing reactor power. The combined effects of the EOC-RPT and the reactor scram reduce fuel bundle power more rapidly than a scram alone. This results in additional margin to the MCPR Safety Limit and LHGR Limit.

The EOC-RPT reduces the severity of these transients at any time during the fuel cycle, but was intended to have the greatest effect at the end of a fuel cycle. During this period of operation, the neutron flux shape in the reactor is such that the initial control rod effectiveness (or rod worth) is reduced during a scram. Because of this flux shape the control rods may not

be able to insert sufficient negative reactivity during the first few feet of their insertion to ensure that the fuel thermal limits will be met. The proposed change establishes MCPR and LHGR limits that compensate for periods when EOC-RPT is not available. The proposed change is consistent with NUREG-1434, *Standard Technical Specifications, General Electric plants, BWR/6*, except for the addition of the alternative LHGR limits.

The fuel designs used at RBS have evolved over time and are more critical power ratio and LHGR tolerant than earlier designs. This has reduced the need for the EOC-RPT function. Therefore the development of fuel thermal limits that do not credit the EOC-RPT function will have a minor impact on plant operation over the operating cycle. Because of the GGNS EOC-RPT instrument malfunction, Entergy intends to implement more restrictive core operating limits that do not credit the EOC-RPT function to protect MCPR and LHGR safety limits at RBS when the trip function is inoperable. Note that the EOC-RPT function is not being disabled and actuation of this feature is expected for turbine trip and load reject events. The effect of EOC-RPT actuation is to lessen the severity of any plant transient.

The cycle specific fuel operating limits based on the design function of the EOC-RPT are currently implemented by and documented in the RBS COLR. Operating limits for the entire cycle are based on an operable EOC-RPT function. The proposed change will allow the COLR to contain operating limits that are applicable when the EOC-RPT function is not operable. The additional restrictions imposed by the revised set of operating limits essentially offset the impact of losing the EOC-RPT function. Therefore, there are no safety consequences associated with the proposed changes.

The EOC-RPT out-of-service condition has been analyzed by the RBS current cycle fuel supplier, Framatome ANP Richland, Inc (FANP). FANP has identified several adjustments to the MCPR and LHGR limits that are necessary to support operation without EOC-RPT. These adjustments will be incorporated into the COLR and into the core monitoring software in the core monitoring computer within 60 days of the issuance of this amendment. This will effectively change the initial conditions for the applicable transients. Core damage risk and other risk measures are unaffected by the proposed change since implementation of revised core operating limits provides equivalent protection for anticipated transients.

5.0 REGULATORY ANALYSIS

5.1 Applicable Regulatory Requirements/Criteria

The proposed changes have been evaluated to determine whether applicable regulations and requirements continue to be met.

Entergy has determined that the proposed changes do not require any exemptions or relief from regulatory requirements, other than the TS, and do not affect conformance with any General Design Criterion (GDC) differently than described in the Updated Final Safety Analysis Report (UFSAR.)

5.2 No Significant Hazards Consideration

Entergy Operations, Inc. has evaluated whether or not a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The End of Cycle Recirculation Pump Trip (EOC-RPT) functions to insert negative reactivity in response to certain anticipated transients. The EOC-RPT is a mitigation function and not the initiator of any evaluated accident or transient. Operation with inoperable EOC-RPT instrumentation and compliance with new restrictive Minimum Critical Power Ratio (MCPR) and Linear Heat Generation Rate (LHGR) operating limits establish sufficient margin to the core thermal MCPR safety limit (SL) and the thermal mechanical design limits as would be the case with operable EOC-RPT instrumentation and existing MCPR and LHGR limits.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change will not create any new modes of plant or equipment operation. The proposed change allows the option to apply an additional penalty factor to the MCPR and LHGR when the EOC-RPT is inoperable. With the addition of the penalty factor, the margin to the MCPR SL and the thermal mechanical design limits are maintained. Therefore, operating the plant with the proposed change will not create the possibility of a new or different kind of accident from any previously analyzed.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

By establishing a new restrictive MCPR and LHGR operating limit, there are no changes to the plant design and safety analysis. There are no changes to the reactor core design instrument setpoints. The margin of safety assumed in the safety analysis is not affected. Applicable regulatory requirements will continue to be met and adequate defense-in-depth will be maintained. Sufficient safety margins will be maintained.

The analytical methods used to determine the revised core operating limits were reviewed and approved by the NRC, and are described in Technical Specification 5.6.5. Specific analyses were prepared by the RBS fuel vendor to develop core operating limits without crediting the EOC-RPT. Therefore, implementation of the proposed changes will not involve a significant reduction in the margin of safety.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, Entergy concludes that the proposed amendment present no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.3 Environmental Considerations

The proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 PRECEDENCE

This change is similar to a request made by Grand Gulf Nuclear Station (GGNS) by letter dated August 10, 2001 and approved by the NRC in a letter dated August 10, 2001. The request was made on an emergency basis for GGNS.

7.0 REFERENCES

1. NUREG-1434, *Standard Technical Specifications, General Electric plants, BWR/6*.
2. Request made by Grand Gulf Nuclear Station by letter dated August 10, 2001 and approved by the NRC in a letter dated August 10, 2001 (TAC NO. MB2595).

Attachment 2

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Proposed Technical Specification Changes (mark-up)

3.3 INSTRUMENTATION

3.3.4.1 End of Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation

LCO 3.3.4.1 *a.* Two channels per trip system for each EOC-RPT instrumentation Function listed below shall be OPERABLE:

- 1. *a*
- 2. *b*

Turbine Stop Valve (TSV) Closure; and

Turbine Control Valve (TCV) Fast Closure, Trip Oil Pressure-Low.

Insert "A"

APPLICABILITY: THERMAL POWER \geq 40% RTP with any recirculation pump in fast speed.

ACTIONS

NOTE

Separate Condition entry is allowed for each channel.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required channels inoperable.	A.1 Restore channel to OPERABLE status.	72 hours
	OR	
	A.2	
	NOTE Not applicable if inoperable channel is the result of an inoperable breaker.	
	Place channel in trip.	72 hours

(continued)

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One or more Functions with EOC-RPT trip capability not maintained.	B.1 Restore EOC-RPT trip capability.	2 hours
	<i>insert "B"</i>	
C. Required Action and associated Completion Time not met.	C.1 Remove the associated recirculation pump fast speed breaker from service.	4 hours
	<u>OR</u> C.2 Reduce THERMAL POWER to < 40% RTP.	4 hours

TECHNICAL SPECIFICATION 3.3.4.1 INSERT

INSERT A

OR

- b. LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR) and LCO 3.2.3, "Linear Heat Generation Rate (LHGR)," limits for inoperable EOC-RPT as specified in the COLR are made applicable.

INSERT B

<p><u>AND</u></p> <p>MCPR and LHGR limits for inoperable EOC-RPT not made applicable.</p>	<p><u>OR</u></p> <p>B.2 Apply the MCPR and LHGR limits for inoperable EOC-RPT as specified in the COLR</p>	<p>2 hours</p>
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Attachment 3

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**Changes to Technical Specification Bases Pages
For Information Only**

BASES

BACKGROUND
(continued) per recirculation pump. One trip system trips one of the two EOC-RPT breakers for each recirculation pump and the second trip system trips the other EOC-RPT breaker for each recirculation pump.

APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY The TSV Closure and the TCV Fast Closure, Trip Oil Pressure-Low Functions are designed to trip the recirculation pumps from fast speed operation in the event of a turbine trip or generator load rejection to mitigate the neutron flux, heat flux, and pressure transients, and to increase the margin to the MCPR SL. The analytical methods and assumptions used in evaluating the turbine trip and generator load rejection, as well as other safety analyses that assume EOC-RPT, are summarized in References 2, 3, and 4.

Insert A

To mitigate pressurization transient effects, the EOC-RPT must trip the recirculation pumps from fast speed operation after initiation of initial closure movement of either the TSVs or the TCVs. The combined effects of this trip and a scram reduce fuel bundle power more rapidly than does a scram alone, resulting in an increased margin to the MCPR SL. The EOC-RPT function is automatically disabled when turbine first stage pressure is < 40% RTP.

EOC-RPT instrumentation satisfies Criterion 3 of the NRC Policy Statement.

The OPERABILITY of the EOC-RPT is dependent on the OPERABILITY of the individual instrumentation channel Functions. Each Function must have a required number of OPERABLE channels in each trip system, with their setpoints within the specified Allowable Value of SR 3.3.4.1.3. The actual setpoint is calibrated consistent with applicable setpoint methodology assumptions. Channel OPERABILITY also includes the associated EOC-RPT breakers. Each channel (including the associated EOC-RPT breakers) must also respond within its assumed response time.

Allowable Values are specified for each EOC-RPT Function specified in the LCO. Nominal trip setpoints are specified in the setpoint calculations. A channel is inoperable if

(continued)

BASES

APPLICABLE
SAFETY ANALYSES,
LCO, and
APPLICABILITY
(continued)

its actual trip setpoint is not within its required Allowable Value. The nominal setpoints are selected to ensure the setpoints do not exceed the Allowable Value between successive CHANNEL CALIBRATIONS. Operation with a trip setpoint less conservative than the nominal trip setpoint, but within its Allowable Value, is acceptable. Trip setpoints are those predetermined values of output at which an action should take place. The setpoints are compared to the actual process parameter (e.g., TSV electrohydraulic control (EHC) pressure), and when the measured output value of the process parameter exceeds the setpoint, the associated device (e.g., trip unit) changes state. The analytic limits are derived from the limiting values of the process parameters obtained from the safety analysis. The Allowable Values are derived from the analytic limits, corrected for calibration, process, and some of the instrument errors. The trip setpoints are then determined accounting for the remaining instrument errors (e.g., drift). The trip setpoints derived in this manner provide adequate protection because instrumentation uncertainties, process effects, calibration tolerances, instrument drift, and severe environment errors (for channels that must function in harsh environments as defined by 10 CFR 50.49) are accounted for.

The specific Applicable Safety Analysis, LCO, and Applicability discussions are listed below on a Function by Function basis.

INSERT B

Turbine Stop Valve Closure

Closure of the TSVs and a main turbine trip result in the loss of a heat sink that produces reactor pressure, neutron flux, and heat flux transients that must be limited. Therefore, an EOC-RPT is initiated on TSV Closure in anticipation of the transients that would result from closure of these valves. EOC-RPT decreases reactor power and aids the reactor scram in ensuring the MCPR SL is not exceeded during the worst case transient.

Closure of the TSVs is determined by limit switches on each stop valve. There are two limit switches associated with each stop valve, and the signal from each limit switch is assigned to a separate trip system. Thus, each trip system

(continued)

BASES

ACTIONS

A.1 and A.2 (continued)

Or apply
the EOC-RPT
inoperable
MCPR and
LHGR limit

the EOC-RPT System is capable of performing the intended function. However, the reliability and redundancy of the EOC-RPT instrumentation is reduced such that a single failure in the remaining trip system could result in the inability of the EOC-RPT System to perform the intended function. Therefore, only a limited time is allowed to restore compliance with the LCO. Because of the diversity of sensors available to provide trip signals, the low probability of extensive numbers of inoperabilities affecting all diverse Functions, and the low probability of an event requiring the initiation of an EOC-RPT, 72 hours is allowed to restore the inoperable channels (Required Action A.1). Alternately, the inoperable channels may be placed in trip (Required Action A.2) since this would conservatively compensate for the inoperability, restore capability to accommodate a single failure, and allow operation to continue. As noted in Required Action A.2, placing the channel in trip with no further restrictions is not allowed if the inoperable channel is the result of an inoperable breaker, since this may not adequately compensate for the inoperable breaker (e.g., the breaker may be inoperable such that it will not open). If it is not desired to place the channel in trip (e.g., as in the case where placing the inoperable channel in trip would result in an EOC-RPT), or if the inoperable channel is the result of an inoperable breaker, Condition C must be entered and its Required Actions taken.

B.1 and B.2

Actions B.1 and B.2 are

Required Action B.1 is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same Function result in the Function not maintaining EOC-RPT trip capability. A Function is considered to be maintaining EOC-RPT trip capability when sufficient channels are OPERABLE or in trip, such that the EOC-RPT System will generate a trip signal from the given Function on a valid signal and both recirculation pumps can be tripped from fast speed operation. This requires two channels of the Function, in the same trip system, to be OPERABLE or in trip, and the associated EOC-RPT fast speed breakers to be OPERABLE or in trip.

Insert C

(continued)

BASES

and B.2

ACTIONS

B.1 (continued)

The 2 hour Completion Time is sufficient for the operator to take corrective action, and takes into account the likelihood of an event requiring actuation of the EOC-RPT instrumentation during this period. It is also consistent with the 2 hour Completion Time provided in LCO 3.2.2, Required Action A.1, since this instrumentation's purpose is to preclude a MCPR violation.

C.1 and C.2

With any Required Action and associated Completion Time not met, THERMAL POWER must be reduced to < 40% RTP within 4 hours. Alternately, the associated recirculation pump fast speed breaker may be removed from service since this performs the intended function of the instrumentation. The allowed Completion Time of 4 hours is reasonable, based on operating experience, to reduce THERMAL POWER to < 40% RTP from full power conditions in an orderly manner and without challenging plant systems.

SURVEILLANCE
REQUIREMENTS

The Surveillances are modified by a Note to indicate that when a channel is placed in an inoperable status solely for performance of required Surveillances, entry into associated Conditions and Required Actions may be delayed for up to 6 hours, provided the associated Function maintains EOC-RPT trip capability. Upon completion of the Surveillance, or expiration of the 6 hour allowance, the channel must be returned to OPERABLE status or the applicable Condition entered and Required Actions taken. This Note is based on the reliability analysis (Ref. 5) assumption of the average time required to perform channel surveillance. That analysis demonstrated that the 6 hour testing allowance does not significantly reduce the probability that the recirculation pumps will trip when necessary.

SR 3.3.4.1.1

A CHANNEL FUNCTIONAL TEST is performed on each required channel to ensure that the entire channel will perform the intended function. Any setpoint adjustment shall be consistent with the assumptions of the current plant specific setpoint methodology.

(continued)

TECHNICAL SPECIFICATION BASES 3.3.4.1 INSERT

INSERT A

Alternatively, MCPR and LHGR limits for an inoperable EOC-RPT as specified in the COLR are sufficient to mitigate pressurization transient effects.

INSERT B

Alternately, since this instrumentation protects against MCPR SL and LHGR violations with the instrumentation inoperable, modifications to the MCPR limits (LCO 3.2.2) and the LHGR limits (LCO 3.2.3) may be applied to allow this LCO to be met. The MCPR and LHGR penalties for the Condition EOC-RPT inoperable is specified in the COLR.

INSERT C

Alternatively, Required Action B.2 requires the MCPR limit and the LHGR limit for inoperable EOC-RPT, as specified in the COLR, to be applied. This also restores the margins to MCPR and LHGR assumed in the safety analysis.

Attachment 4

RBG-46325

List of Regulatory Commitments

List of Regulatory Commitments

The following table identifies those actions committed to by Entergy in this document. Any other statements in this submittal are provided for information purposes and are not considered to be regulatory commitments.

COMMITMENT	TYPE (Check one)		SCHEDULED COMPLETION DATE (if Required)
	ONE- TIME ACTION	CONTINUING COMPLIANCE	
The Bases will be revised to confirm that the alternative MCPR and LHGR operating limits are sufficient to mitigate pressurization transient effects and that the alternative limits restore the margin to the MCPR assumed in the safety analysis.	X		Within 60 days of issuance of amendment
These adjustments will be incorporated into the COLR and into the core monitoring software in the core monitoring computer within 60 days of the issuance of this amendment.	X		Within 60 days of issuance of amendment