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10CFR50.90

BVPS Letter Number L-05-001
DBNPS Letter Serial Number 3080
PNPP Letter PY-CEI/NRR-2852L

February 22, 2005

United States Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001

SUBJECT:

Beaver Valley Power Station Unit 1	Beaver Valley Power Station Unit 2
Docket Number 50-334	Docket Number 50-412
Operating License Number DPR-66	Operating License Number NPF-73
Davis-Besse Nuclear Power Station	Perry Nuclear Power Plant
Docket Number 50-346	Docket Number 50-440
Operating License Number NPF-3	Operating License Number NPF-58

Application for Technical Specification Improvement to Eliminate Requirements to Provide Monthly Operating Reports And Occupational Radiation Exposure Reports

Ladies and Gentlemen:

In accordance with the provisions of Section 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), the FirstEnergy Nuclear Operating Company (FENOC) is submitting a request for amendments to the Technical Specifications (TS) for the Beaver Valley Power Station, Units 1 and 2 (BVPS), the Davis-Besse Nuclear Power Station, Unit 1 (DBNPS), and the Perry Nuclear Power Plant (PNPP).

The proposed amendments would revise the Administrative Controls section of the Technical Specifications to delete the requirements to submit Monthly Operating Reports and Occupational Radiation Exposure Reports. The proposed changes are consistent with NRC-approved Revision 1 to industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report." The availability of this TS improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067) as part of the consolidated line item improvement process (CLIIP).

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In order for FENOC to accrue the benefits afforded by the rule change in a timely manner, approval of the proposed amendments is requested by December 30, 2005. Once approved, the amendments shall be implemented within 60 days.

The proposed changes have been reviewed by the onsite and offsite review committees at each of the respective stations.

Should you have any questions or require additional information, please contact Mr. Henry L. Hegrat, Supervisor – Fleet Licensing, at (330) 315-6944. Enclosure 1 includes a description and assessment of the proposed amendments. A list of regulatory commitments made in this letter is included in Enclosure 2.

The statements contained in this submittal, including its associated enclosures and attachments, are true and correct to the best of my knowledge and belief. I am authorized by the FirstEnergy Nuclear Operating Company to make this submittal. I declare under penalty of perjury that the foregoing is true and correct.

Executed on 02-22-05

Joseph J. Hagan
Senior Vice President, Engineering and Services

MKL

Enclosure1 – License Amendment Application Description and Assessment
- Attachment 1 - Proposed Mark-Up Of Technical Specification Pages for the BVPS
- Attachment 2 - Proposed Mark-Up Of Technical Specification Pages for the DBNPS
- Attachment 3 - Proposed Mark-Up Of Technical Specification Pages for the PNPP
- Attachment 4 - Proposed Retyped Technical Specification Pages for the DBNPS
- Attachment 5 - Proposed Retyped Technical Specification Pages for the PNPP
- Attachment 6 - Technical Specification Bases Pages for the BVPS

Enclosure 2 – Commitment List

cc: S. J. Collins, Regional Administrator, NRC Region I
J. L. Caldwell, Regional Administrator, NRC Region III
T. G. Colburn, NRC/NRR Senior Project Manager – Beaver Valley Power Station
J. B. Hopkins, NRC/NRR Senior Project Manager – Davis-Besse Nuclear Power Station
W. A. Macon, NRC/NRR Project Manager – Perry Nuclear Power Plant
P. C. Cataldo, NRC Region I, Sr. Resident Inspector – Beaver Valley Power Station
C. S. Thomas, NRC Region III, Sr. Resident Inspector –
Davis-Besse Nuclear Power Station
R. J. Powell, NRC Region III, Sr. Resident Inspector – Perry Nuclear Power Plant
D. J. Shipley, Executive Director, Ohio Emergency Management Agency,
State of Ohio (NRC Liaison)
Utility Radiological Safety Board
D. A. Allard, Director PA BRP/DEP
L. E. Ryan, BRP/DEP

APPLICATION FOR TECHNICAL SPECIFICATION IMPROVEMENT TO ELIMINATE REQUIREMENTS TO PROVIDE MONTHLY OPERATING REPORTS AND OCCUPATIONAL RADIATION EXPOSURE REPORTS

Station	License Amendment Request No.
Beaver Valley Power Station, Units 1 and 2	329 Unit 1 / 198 Unit 2
Davis-Besse Nuclear Power Station, Unit 1	04-0023
Perry Nuclear Power Plant	04-090

DESCRIPTION AND ASSESSMENT

1.0 INTRODUCTION

2.0 DESCRIPTION OF PROPOSED AMENDMENT

3.0 BACKGROUND

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

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8.0 ENVIRONMENTAL EVALUATION

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1.0 INTRODUCTION

In accordance with the provisions of Section 50.90 of Title 10 of the Code of Federal Regulations (10 CFR), the FirstEnergy Nuclear Operating Company (FENOC) is submitting a request for amendments to the Technical Specifications (TS) for the following Operating Licenses:

Beaver Valley Power Station Unit 1 Docket Number 50-334 Operating License Number DPR-66	Beaver Valley Power Station Unit 2 Docket Number 50-412 Operating License Number NPF-73
Davis-Besse Nuclear Power Station Docket Number 50-346 Operating License Number NPF-3	Perry Nuclear Power Plant Docket Number 50-440 Operating License Number NPF-58

The proposed amendments would revise the Administrative Controls section of the Technical Specifications to delete the requirements to submit Monthly Operating Reports and Occupational Radiation Exposure Reports.

The proposed changes are consistent with NRC-approved Industry/Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1. The availability of this technical specification improvement was announced in the Federal Register on June 23, 2004 (69 FR 35067), as part of the consolidated line item improvement process (CLIIP).

2.0 DESCRIPTION OF PROPOSED AMENDMENTS

Consistent with the NRC-approved Revision 1 of TSTF-369, the proposed changes would revise the Administrative Controls section of the Technical Specifications to delete the requirements to submit Monthly Operating Reports and Occupational Radiation Exposure Reports. The specific changes are as follows:

For the Beaver Valley Power Station, Units 1 and 2 (BVPS):

- TS 6.9.1, pertaining to the annual Occupational Radiation Exposure Report, would be deleted.
- TS 6.9.4, pertaining to the Monthly Operating Report, would be deleted.
- Consistent with the change to TS 6.9.4, TS 3/4.1.3.2, "Reactivity Control Systems, Position Indication Systems – Operating," Footnote 3, will be revised by deleting the phrase "...in the monthly operating report." (Unit 1 only)
- Associated changes to the TS Index would be made.

- Technical Specification pages (including index pages) will be revised and repaginated as necessary to meet format requirements and reflect the changes being proposed by this license amendment request.

For the Davis-Besse Nuclear Power Station, Unit 1 (DBNPS):

- TS 6.9.1.5.a, pertaining to the annual Occupational Radiation Exposure Report, would be deleted.
- TS 6.9.1.6, pertaining to the Monthly Operating Report, would be deleted.

For the Perry Nuclear Power Plant (PNPP):

- TS 5.6.1, pertaining to the annual Occupational Radiation Exposure Report, would be deleted.
- TS 5.6.4, pertaining to the Monthly Operating Reports, would be deleted.

As addressed in the safety evaluation published in the Notice of Availability for TSTF-369, FENOC is also proposing to adopt a part of NRC-approved Revision 4 to TSTF-258, "Changes to Section 5.0, Administrative Controls," for the BVPS and the DBNPS. Specifically, BVPS TS 6.9.4 includes a requirement to include in the Monthly Operating Report "documentation of all challenges to the pressurizer power operated relief valves or pressurizer safety valves." Similarly, DBNPS TS 6.9.1.6 includes a requirement to include in the Monthly Operating Report documentation of any "challenges to the Pressurizer Pilot Operated Relief Valve (PORV) and the Pressurizer Code Safety Valves." The NRC model safety evaluation addressed the removal of requirements to submit monthly operating reports in those cases where the TS includes a requirement to address challenges to relief and safety valves (i.e., if a licensee had not yet adopted the associated part of TSTF-258). The proposed change is consistent with the option described in the Notice of Availability published on June 23, 2004 (69 FR 35067) and the related documentation for both TSTF-369 and the limited portion of TSTF-258 included in this application.

3.0 BACKGROUND

The background for this application is adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

4.0 REGULATORY REQUIREMENTS AND GUIDANCE

The applicable regulatory requirements and guidance associated with this application are adequately addressed by the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

5.0 TECHNICAL ANALYSIS

FENOC has reviewed the Nuclear Regulatory Commission (NRC) staff's safety evaluation (SE) published on June 23, 2004 (69 FR 35067) as part of the CLIIP Notice of Availability. This verification included a review of the NRC staff's SE, as well as the supporting information provided to support TSTF-369. FENOC has concluded that the information presented in the TSTF proposal and the SE prepared by the NRC staff are applicable and support this amendment for the incorporation of the changes to the TS.

Footnote 3 of the BVPS Unit 1 TS 3/4.1.3.2 presently states: "Malfunctions of the group demand counters or analog RPI, providing no actual rod misalignment existed during the malfunction, shall be reported in the monthly operating report." The phrase "...in the monthly operating report," is proposed to be deleted. The BVPS Unit 1 TS Bases will be revised to state that the mechanism for the required report will be the electronic monthly operating report via the combined industry database. This change is acceptable because the administrative requirement specifying the revised method of reporting will be retained within the TS Bases.

6.0 REGULATORY ANALYSIS

A description of this proposed change and its relationship to applicable regulatory requirements and guidance was provided in the NRC Notice of Availability published on June 23, 2004 (69 FR 35067) and TSTF-369.

6.1 Verification and Commitments

As discussed in the NRC staff's model SE published in the Federal Register on June 23, 2004 (69 FR 35067) for this TS improvement, FENOC is making the following regulatory commitment and verification:

1. FENOC is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations). This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).

2. None of the three sites, taken individually, have different reactor types or both operating and shutdown reactors.

7.0 NO SIGNIFICANT HAZARDS CONSIDERATION

FENOC has reviewed the proposed no significant hazards consideration determination published on June 23, 2004 (69 FR 35067) as part of the CLIIP. FENOC has concluded that the proposed determination presented in the notice is applicable to the BVPS, the DBNPS, and the PNPP, and the determination is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

8.0 ENVIRONMENTAL EVALUATION

FENOC has reviewed the environmental evaluation included in the model SE published on June 23, 2004 (69 FR 35067) as part of the CLIIP. FENOC has concluded that the staff's findings presented in that evaluation are applicable to the BVPS, the DBNPS, and the PNPP, and the evaluation is hereby incorporated by reference for this application.

9.0 PRECEDENT

This application is being made in accordance with the CLIIP. FENOC is not proposing variations or deviations from the TS changes described in TSTF-369 and the limited portion of TSTF-258 or the NRC staff's model SE published on June 23, 2004 (69 FR 35067) other than format differences and deletion of reference to the Monthly Operating Report in BVPS Unit 1 Technical Specification 3/4.1.3.2, Footnote 3.

10.0 REFERENCES

1. "Notice of Availability of Model Application Concerning Technical Specifications Improvement to Eliminate Requirements to Provide Monthly Operating Reports and Occupational Radiation Exposure Reports Using the Consolidated Line Item Improvement Process," published in the Federal Register on June 23, 2004 (69 FR 35067).

2. TSTF-369, "Removal of Monthly Operating Report and Occupational Radiation Exposure Report," Revision 1.

3. TSTF-258, "Changes to Section 5.0, Administrative Controls," Revision 4.

11.0 ATTACHMENTS

1. Proposed Mark-Up Of Technical Specification Pages for the BVPS.
2. Proposed Mark-Up Of Technical Specification Pages for the DBNPS.
3. Proposed Mark-Up Of Technical Specification Pages for the PNPP.
4. Proposed Retyped Technical Specification Pages for the DBNPS.
5. Proposed Retyped Technical Specification Pages for the PNPP.
6. Technical Specification Bases Pages for the BVPS.

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PROPOSED MARK-UP
OF
TECHNICAL SPECIFICATION PAGES
FOR THE
BVPS

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POSITION INDICATION SYSTEMS-OPERATING

LIMITING CONDITION FOR OPERATION

3.1.3.2 The shutdown and control rod position indication system shall be OPERABLE as follows:

Group Demand Counter(1), 1 per group

Individual analog rod position instrument channel, 1 per rod ±12 steps(1) accuracy(3).

(1) During the first hour following rod motion, the group demand counter is the primary indicator of precise rod position information, with the analog channels displaying general rod movement information. For power levels below 50%, a 1-hour thermal soak time is allowed before the analog channels are required to perform within the specified accuracy.

(2) For power levels below 50% a one hour thermal soak time is allowed.

(3) Malfunctions of the group demand counters or analog RPI, providing no actual rod misalignment existed during the malfunction, shall be reported ~~in the monthly operating report~~.

The provisions of Specifications 4.0.2 and 4.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

6.9 REPORTING REQUIREMENTS

The following reports shall be submitted in accordance with 10 CFR 50.4.

6.9.1 ~~DELETEDOccupational Radiation Exposure Report~~

~~NOTE~~

~~A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.~~

~~A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totalling less than 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total whole body dose received from external sources should be assigned to specific major work functions. The report shall be submitted by April 30 of each year.~~

6.9.2 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

NOTE

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM) and in 10 CFR Part 50 Appendix I Sections IV.B.2, IV.B.3, and IV.C.

This page includes change proposed by LAR 310

6.9.3 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

- - - - - - - - - - - - - - - - - - NOTE - - - - - - - - - - - - - - - - - - -

A single submittal may be made for a multi-unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

- -

The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program (PCP) and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I Section IV.B.1.

6.9.4 DELETED~~MONTHLY OPERATING REPORT~~

~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the pressurizer power operated relief valves or pressurizer safety valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

6.9.5 CORE OPERATING LIMITS REPORT (COLR)

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

2.1.1	Reactor Core Safety Limits
3.1.3.5	Shutdown Rod Insertion Limits
3.1.3.6	Control Rod Insertion Limits
3.2.1	Axial Flux Difference-~~Constant~~Relaxed Axial Offset Control
3.2.2	Heat Flux Hot Channel Factor-$F_Q(Z)$
3.2.3	Nuclear Enthalpy Rise Hot Channel Factor-$F^N_{\Delta H}$
3.2.5	DNB Parameters
3.3.1.1	Reactor Trip System Instrumentation - Overtemperature and Overpower ΔT Setpoint Parameter Values

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6.9.6	Pressure and Temperature Limits Report (PTLR)	6-21
6.10 DELETED		
6.11 RADIATION PROTECTION PROGRAM		6-22

PROCEDURES (Continued)

The program shall include:

1. The limits for concentrations of hydrogen and oxygen in the Waste Gas Holdup System and a surveillance program to ensure the limits are maintained. Such limits shall ensure that the concentration of hydrogen and oxygen is maintained below the flammability limits.

2. A surveillance program to ensure that the quantity of radioactivity contained in each connected group of Gaseous Waste Storage Tanks is less than the amount that would result in a whole body exposure of > 0.5 rem to any individual in an unrestricted area, in the event of an uncontrolled release of the tanks' contents, and

3. A surveillance program to ensure that the quantity of radioactivity contained in all outdoor liquid radwaste tanks that are not surrounded by liners, dikes, or walls, capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the Liquid Radwaste Treatment System is less than the amount that would result in concentrations greater than the limits of 10 CFR 20, Appendix B, Table 2, Column 2, at the nearest potable water supply and the nearest surface water supply in an unrestricted area, in the event of an uncontrolled release of the tanks' contents.

The provisions of Specifications 4.0.2 and 4.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

6.9 REPORTING REQUIREMENTS

The following reports shall be submitted in accordance with 10 CFR 50.4.

6.9.1 DELETED~~Occupational Radiation Exposure Report~~

~~NOTE~~

~~A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.~~

REPORTING REQUIREMENTS (Continued)

~~A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) receiving exposure greater than 100 mrem/yr and their associated man rem exposure according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totalling less than 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total whole body dose received from external sources should be assigned to specific major work functions. The report shall be submitted by April 30 of each year.~~

6.9.2 ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

- - - - - - - - - - - - - - - - - - NOTE - - - - - - - - - - - - - - - - - -

A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.

- -

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM) and in 10 CFR Part 50, Appendix I Sections IV.B.2, IV.B.3, and IV.C.

6.9.3 ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

- - - - - - - - - - - - - - - - - - NOTE - - - - - - - - - - - - - - - - - -

A single submittal may be made for a multi-unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

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This page includes change proposed by LAR 182

REPORTING REQUIREMENTS (Continued)

The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program (PCP) and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I Section IV.B.1.

6.9.4 DELETED~~MONTHLY OPERATING REPORT~~

~~Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the pressurizer power operated relief valves or pressurizer safety valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

6.9.5 CORE OPERATING LIMITS REPORT (COLR)

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

2.1.1	Reactor Core Safety Limits
3.1.3.5	Shutdown Rod Insertion Limits
3.1.3.6	Control Rod Insertion Limits
3.2.1	Axial Flux Difference-~~Constant~~Relaxed Axial Offset Control
3.2.2	Heat Flux Hot Channel Factor-$F_Q(Z)$
3.2.3	Nuclear Enthalpy Rise Hot Channel Factor-$F^N_{\Delta H}$
3.2.5	DNB Parameter
3.3.1.1	Reactor Trip System Instrumentation - Overtemperature and Overpower ΔT setpoint parameter values

b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

WCAP-9272-P-A, "WESTINGHOUSE RELOAD SAFETY EVALUATION METHODOLOGY," July 1985 (Westinghouse Proprietary).

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Enclosure 1
Attachment 2

PROPOSED MARK-UP
OF
TECHNICAL SPECIFICATION PAGES
FOR THE
DBNPS

(2 pages follow)

ANNUAL OPERATING REPORT

6.9.1.4 Annual reports covering the activities of the unit during the previous calendar year shall be submitted prior to March 31 of each year.

6.9.1.5 Reports required on an annual basis shall include:

a. ~~A tabulation on an annual basis of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions[*], e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (described maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.~~ Deleted

b. The complete results of steam generator tube inservice inspections (Specification 4.4.5.5.b).

c. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in

~~[*]This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.~~

microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

MONTHLY OPERATING REPORT

6.9.1.6 ~~Routine reports of operating statistics, shutdown experience and challenges to the Pressurizer Pilot Operated Relief Valve (PORV) and the Pressurizer Code Safety Valves shall be submitted on a monthly basis to arrive no later than the 15th of each month following the calendar month covered by the report, as follows: The signed original to the Nuclear Regulatory Commission, Document Control Desk, Washington, D. C. 20555, and one copy each to the Region III Administrator and the Davis-Besse Resident Inspector.~~Deleted

CORE OPERATING LIMITS REPORT

6.9.1.7 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle and any remaining part of a reload cycle for the following:

2.1.2	AXIAL POWER IMBALANCE Protective Limits for Reactor Core Specification 2.1.2
2.2.1	Trip Setpoint for Flux – ΔFlux/Flow for Reactor Protection System Setpoints Specification 2.2.1
3.1.1.3c	Negative Moderator Temperature Coefficient Limit
3.1.3.6	Regulating Rod Insertion Limits
3.1.3.7	Rod Program
3.1.3.8	Xenon Reactivity
3.1.3.9	Axial Power Shaping Rod Insertion Limits
3.2.1	AXIAL POWER IMBALANCE
3.2.2	Nuclear Heat Flux Hot Channel Factor, F_Q
3.2.3	Nuclear Enthalpy Rise Hot Channel Factor, $F^N_{\Delta H}$
3.2.4	QUADRANT POWER TILT

The analytical methods used to determine the core operating limits addressed by the individual Technical Specifications shall be: those previously reviewed and approved by the NRC, as described in BAW-10179P-A, "Safety Criteria and Methodology for Acceptable Cycle Reload Analyses", or any other new NRC-approved analytical methods used to determine core operating limits that are not yet referenced in the applicable approved revision of BAW-10179P-A. The applicable approved revision number for BAW-10179P-A at the time the reload analyses are performed shall be identified in the CORE OPERATING LIMITS REPORT. The CORE OPERATING LIMITS REPORT shall also list any new NRC-approved analytical methods used to determine core operating limits that are not yet referenced in the applicable approved revision of BAW-10179P-A.

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PROPOSED MARK-UP
OF
TECHNICAL SPECIFICATION PAGES
FOR THE
PNPP

(2 pages follow)

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

Deleted

A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was performed, receiving an annual deep dose equivalent > 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions, (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescent dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totalling < 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total deep dose equivalent received from external sources should be assigned to specific major work functions.

The Occupational Radiation Exposure Report covering the activities of the unit for the previous year shall be submitted by April 30 of each year.

5.6.2 Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous year shall be submitted by May 1 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated

(continued)

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted by May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and process control program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Deleted

~~Routine reports of operating statistics and shutdown experience, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.~~

5.6.5 Core Operating Limits Report (COLR)

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

1. LCO 3.2.1, Average Planar Linear Heat Generation Rate (APLHGR),
2. LCO 3.2.2, Minimum Critical Power Ratio (MCPR),
3. LCO 3.2.3, Linear Heat Generation Rate (LHGR),

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ANNUAL OPERATING REPORT

6.9.1.4 Annual reports covering the activities of the unit during the previous calendar year shall be submitted prior to March 31 of each year.

6.9.1.5 Reports required on an annual basis shall include:

a. Deleted.

b. The complete results of steam generator tube inservice inspections (Specification 4.4.5.5.b).

c. The results of specific activity analysis in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded; (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up system flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration and one other radioiodine isotope concentration in

microcuries per gram as a function of time for the duration of the specific activity above the steady-state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

MONTHLY OPERATING REPORT

6.9.1.6 Deleted

CORE OPERATING LIMITS REPORT

6.9.1.7 Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle and any remaining part of a reload cycle for the following:

2.1.2	AXIAL POWER IMBALANCE Protective Limits for Reactor Core Specification 2.1.2
2.2.1	Trip Setpoint for Flux – ΔFlux/Flow for Reactor Protection System Setpoints Specification 2.2.1
3.1.1.3c	Negative Moderator Temperature Coefficient Limit
3.1.3.6	Regulating Rod Insertion Limits
3.1.3.7	Rod Program
3.1.3.8	Xenon Reactivity
3.1.3.9	Axial Power Shaping Rod Insertion Limits
3.2.1	AXIAL POWER IMBALANCE
3.2.2	Nuclear Heat Flux Hot Channel Factor, F_Q
3.2.3	Nuclear Enthalpy Rise Hot Channel Factor, $F^N_{\Delta H}$
3.2.4	QUADRANT POWER TILT

The analytical methods used to determine the core operating limits addressed by the individual Technical Specifications shall be: those previously reviewed and approved by the NRC, as described in BAW-10179P-A, "Safety Criteria and Methodology for Acceptable Cycle Reload Analyses", or any other new NRC-approved analytical methods used to determine core operating limits that are not yet referenced in the applicable approved revision of BAW-10179P-A. The applicable approved revision number for BAW-10179P-A at the time the reload analyses are performed shall be identified in the CORE OPERATING LIMITS REPORT. The CORE OPERATING LIMITS REPORT shall also list any new NRC-approved analytical methods used to determine core operating limits that are not yet referenced in the applicable approved revision of BAW-10179P-A.

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PROPOSED RETYPED
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5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Occupational Radiation Exposure Report

Deleted

5.6.2 Annual Radiological Environmental Operating Report

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous year shall be submitted by May 1 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated

(continued)

5.6 Reporting Requirements

5.6.2 Annual Radiological Environmental Operating Report (continued)

results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering the operation of the unit during the previous year shall be submitted by May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and process control program and in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6.4 Monthly Operating Reports

Deleted

5.6.5 Core Operating Limits Report (COLR)

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

1. LCO 3.2.1, Average Planar Linear Heat Generation Rate (APLHGR).

2. LCO 3.2.2, Minimum Critical Power Ratio (MCPR).

3. LCO 3.2.3, Linear Heat Generation Rate (LHGR).

(continued)

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TECHNICAL SPECIFICATION BASES PAGES
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Note: The Bases pages are provided for information only.

Provided for Information Only.

3/4.1.3 MOVABLE CONTROL ASSEMBLIES

The specifications of this section ensure that (1) acceptable power distribution limits are maintained, (2) the minimum SHUTDOWN MARGIN is maintained, and (3) the potential effects of rod misalignment on associated accident analyses are limited. OPERABILITY of the movable control assemblies is established by observing rod motion and determining that rods are positioned within ± 12 steps (indicated position), of the respective group demand counter position. The OPERABILITY of the rod position indication system is established by appropriate periodic CHANNEL CHECKS and verification that the analog rod position indicators agree with the demand position indicators within 12 steps over the full range of indicated rod travel. The verification of individual rod position indicators and demand position indicators within the required 12 steps over the full range of indicated rod travel is accomplished by comparisons of the indications at specific rod positions (identified in the applicable surveillance procedure) and calibrations as necessary to ensure the required accuracy is achieved. OPERABILITY of the control rod position indicators is required to determine control rod position and thereby ensure compliance with the control rod alignment and insertion limits. The OPERABLE condition for the analog rod position indicators is defined as being capable of indicating rod position within ± 12 steps of the associated group demand indicator. For power levels below 50 percent, the specifications of this section permit a one hour stabilization period to permit stabilization of known thermal drift in the analog rod position indicator channels. During this stabilization period, greater reliance is placed upon the group demand position indicators to determine rod position. Above 50 percent power, rod motion is not expected to induce thermal transients of sufficient magnitude to exceed the rod position indicator instrument accuracy of ± 12 steps. Limited use of rod position indication primary detector voltages is allowed as a backup method of determining control rod positions. Comparison of the group demand indicator to the calibration curve is sufficient to allow determination that a control rod is indeed misaligned from its bank when primary voltage measurements are used. Comparison of the group demand counters to the bank insertion limits with verification of rod position with the analog rod

position indicators (after thermal soak after rod motion) is sufficient verification that the control rods are above the insertion limits below 50 percent power. Above 50 percent power, reliance is placed on the analog rod position indicator channels to assure that control rods are above the insertion limits.

The ACTION statements which permit limited variations from the basic requirements are accompanied by additional restrictions which ensure that the original design criteria are met. Misalignment of a rod requires measurement of peaking factors and a restriction in THERMAL POWER. These restrictions provide assurance of fuel rod integrity during continued operation. In addition, those safety analyses affected by a misaligned rod are reevaluated to confirm that the results remain valid during future operation.

For Specification 3.1.3.1 ACTION c. and d., it is incumbent upon the plant to verify the trippability of the inoperable control rod(s). Trippability is defined in Attachment C to a letter dated December 21, 1984, from E. P. Rahe (Westinghouse) to C. O. Thomas (NRC). This may be by verification of a control system failure, usually electrical in nature, or that the failure is associated with the control rod stepping mechanism. In the event the plant is unable to verify the rod(s) trippability, it must be assumed to be untrippable and thus falls under the requirements of ACTION a.

Malfunctions of the group demand counters or analog RPI described in Footnote 3 of Specification 3.1.3.2 shall be reported to the NRC in the electronic monthly operating report via the combined industry database.

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COMMITMENT LIST

THE FOLLOWING LIST IDENTIFIES THOSE ACTIONS COMMITTED TO BY FENOC IN THIS DOCUMENT. ANY OTHER ACTIONS DISCUSSED IN THE SUBMITTAL REPRESENT INTENDED OR PLANNED ACTIONS, AND ARE DESCRIBED ONLY FOR INFORMATION AND ARE NOT REGULATORY COMMITMENTS. PLEASE NOTIFY HENRY L. HEGRAT, SUPERVISOR – FLEET LICENSING, AT (330) 315-6944 OF ANY QUESTIONS REGARDING THIS DOCUMENT OR ANY ASSOCIATED REGULATORY COMMITMENTS.

COMMITMENTS	DUE DATE
FENOC is making a regulatory commitment to provide to the NRC using an industry database the operating data (for each calendar month) that is described in Generic Letter 97-02, "Revised Contents of the Monthly Operating Report," by the last day of the month following the end of each calendar quarter. The regulatory commitment will be based on use of an industry database (e.g., the industry's Consolidated Data Entry (CDE) program, currently being developed and maintained by the Institute of Nuclear Power Operations).	This regulatory commitment will be implemented to prevent any gaps in the monthly operating statistics and shutdown experience provided to the NRC (i.e., data for all months will be provided using one or both systems (monthly operating reports and CDE)).