Florida Power & Light Company, 6501 S. Ocean Drive, Jensen Beach, FL 34957

FPL

April 21, 2005

L-2005-056
10 CFR 50.90

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

RE: St. Lucie Units 1 and 2
Docket Nos. 50-335 and 50-389
Proposed License Amendments
Adoption of Selected Improved Standard Technical Specification (ISTS)
Travelers and Selected ISTS Requirements

Pursuant to 10 CFR 50.90, Florida Power & Light Company (FPL) requests to amend Facility Operating Licenses DPR-67 and NPF-16 for St. Lucie Units 1 and 2. The proposed amendments revise the Technical Specifications (TS) to incorporate seven generic changes that have been made to the Improved Standard Technical Specifications (ISTS), NUREG-1432, *Standard Technical Specifications for Combustion Engineering Plants.* These generic changes, known as Travelers, were developed by the Technical Specifications Task Force (TSTF) and have been previously reviewed and approved by the Nuclear Regulatory Commission. The seven Travelers are:

1. TSTF-5, Rev. 1, Delete safety limit violation notification requirements.
2. TSTF-65, Rev. 1, Use of generic titles for utility positions.
3. TSTF-101, Rev. 0, Change AFW pump testing frequency to be in accordance with the Inservice Testing Program. Also delete the plant specific pressures to be consistent with the ISTS.
4. TSTF-258, Rev. 4, Changes to Section 5.0, Administrative Controls.
5. TSTF-299, Rev. 0, Administrative Controls Program 5.5.2.b Test Interval and Exception.
6. TSTF-308, Rev. 1, Determination of Cumulative and Projected Dose Contributions in RECP.
7. TSTF-361, Rev. 2, Allow standby SDC/RHR/DHR loop to inoperable to support testing.

In addition, the proposed amendments revise the Technical Specifications to adopt the ISTS requirements for remote shutdown instrumentation and the ISTS actions and action times for accident monitoring instrumentation.

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Attachment 1 provides the proposed license amendments description and justification. Attachment 2 is the no significant hazards considerations and the environmental consideration. Attachments 3 and 4 provide the marked-up copies of the proposed Technical Specification changes. Attachments 5 and 6 are information copies of the retyped TS pages. Attachments 7 and 8 are information copies of the proposed changes to the TS Bases. There are no regulatory commitments associated with this submittal.

The proposed license amendments are similar in nature to other NRC approved industry license amendments associated with adopting TSTF Travelers. Specific references are included in Attachment 1.

FPL has determined that the proposed license amendments do not involve a significant hazards consideration pursuant to 10 CFR 50.92. The St. Lucie Facility Review Group and the Florida Power & Light Company Nuclear Review Board have reviewed the proposed amendments. In accordance with 10 CFR 50.91 (b)(1), a copy of the proposed amendments is being forwarded to the State Designee for the State of Florida.

FPL requests that the proposed amendments be approved within twelve months of submittal. Please issue the amendment to be effective on the date of issuance and to be implemented within 60 days of receipt by FPL.

Please contact George Madden at 772-467-7155 if there are any questions about this submittal.

Very truly yours,

William Jefferson, Jr.
Vice President
St. Lucie Plant

WJ/GRM

Attachments

cc: Mr. William A. Passetti, Florida Department of Health

STATE OF FLORIDA)
) ss.
COUNTY OF ST. LUCIE)

William Jefferson, Jr. being first duly sworn, deposes and says:

That he is Vice President, St. Lucie Plant, for the Nuclear Division of Florida Power & Light Company, the Licensee herein;

That he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute the document on behalf of said Licensee.

William Jefferson, Jr

STATE OF FLORIDA

COUNTY OF ST. LUCIE

Sworn to and subscribed before me

this 21 day of April, 2005
by William Jefferson, Jr, who is personally known to me.

Name of Notary Public - State of Florida

George R Madden
My Commission DD318814
Expires June 17 2008

(Print, type or stamp Commissioned Name of Notary Public)

ATTACHMENTS

Attachment 1	Proposed License Amendments Description and Justification
Attachment 2	No Significant Hazards Considerations and Environmental Considerations
Attachment 3	Proposed Mark-Up of Unit 1 Affected Technical Specifications
Attachment 4	Proposed Mark-Up of Unit 2 Affected Technical Specifications
Attachment 5	Retyped Unit 1 Technical Specification Pages (for information only)
Attachment 6	Retyped Unit 2 Technical Specification Pages (for information only)
Attachment 7	Proposed Mark-Up of Unit 1 Affected Bases (for information only)
Attachment 8	Proposed Mark-Up of Unit 2 Affected Bases (for information only)

ATTACHMENT 1

PROPOSED LICENSE AMENDMENTS

DESCRIPTION AND JUSTIFICATION

Introduction

The proposed changes revise the St. Lucie Unit 1 and Unit 2 Technical Specifications (TS) to adopt seven generic improvements, known as Travelers. These Travelers have been incorporated into subsequent revisions of the Improved Standard Technical Specifications (ISTS), including NUREG-1432, *Standard Technical Specifications for Combustion Engineering Plants*, and are applicable to the St. Lucie TS as described below. These changes have been reviewed generically and approved by the Nuclear Regulatory Commission (NRC).

In addition, the proposed amendments revise the TS to adopt the ISTS requirements for remote shutdown instrumentation and the ISTS actions and completion times for accident monitoring instrumentation.

Background

Since Revision 1 of the ISTS was published in 1995, the industry and the NRC staff have identified additional ISTS improvements. These improvements are proposed by the industry Technical Specifications Task Force (TSTF) and referenced by a TSTF number. Following industry acceptance and NRC staff approval, the NRC incorporates the Traveler into the ISTS. In most cases, these changes are generally applicable to individual plants and may be adopted by license amendment into plant-specific Technical Specifications.

The St. Lucie Units 1 and 2 Technical Specifications are not based on the ISTS. However, these Travelers, including the justification accepted by the NRC, are applicable to the St. Lucie Units 1 and 2 TS, as described below. Note that when quoting text from the ISTS, text that is plant-specific is surrounded by brackets (i.e., [ ]).

Proposed Change Description and Justification

Each Traveler is treated as a separate and complete entity in order to facilitate the presentation and review of the proposed changes. The following format is used for the descriptions and justifications of the proposed changes:

- Traveler Title – identifies the Traveler number and title.
- NRC Approval – provides the reference for the approval of the Traveler.
- Description of Proposed St. Lucie TS Change – provides a summary description of the proposed TS change associated with this Traveler.
- Comparison of the St. Lucie TS requirements to the ISTS and differences between the proposed TS changes and the Traveler – provides a description of the specific changes to the ISTS that were made by the Traveler together with a

description of the proposed specific changes to the St. Lucie TS. An assessment of the differences between the proposed TS changes and the Traveler is also provided.

- Justification – provides the justification for the proposed TS change.

- St. Lucie Units 1 and 2 TS Pages Affected – lists the Unit 1 and Unit 2 TS pages that are being changed.

- St. Lucie Units 1 and 2 TS Bases Pages Affected – lists the Unit 1 and Unit 2 TS Bases pages that are being changed.

- Licensing Precedent – provides references for previous license amendment requests based on this Traveler, and the associated approval by the NRC.

This is the presentation format for each of the seven Travelers and the associated St. Lucie TS changes.

The proposed changes for the remote shutdown instrumentation and the accident monitoring instrumentation Technical Specifications are not associated with the Travelers. However, the presentation format for the descriptions and justifications for the proposed changes to these specifications is generally the same as the format used for the Travelers with the following exceptions:

- ISTS specification replaces the traveler title, and identifies the ISTS specification number and title associated with these proposed changes

- NRC approval is not used because the ISTS specifications were not approved individually like the Travelers.

Traveler Title: TSTF-5, Revision 1, Delete safety limit violation notification requirements.

NRC Approval: Letter from C. I. Grimes (NRC) to J. Davis (NEI) dated September 27, 1996.

Description of Proposed St. Lucie TS Change: The proposed change deletes notification, reporting, and restart requirements from the TS if a safety limit is violated. Section 6.7 of the St. Lucie Units 1 and 2 TS is being deleted and is being replaced with the term "DELETED," and the references to Specification 6.7.1 are being deleted from Unit 2 TS 2.1.

Comparison of the St. Lucie TS Requirements to the ISTS and Differences Between the Proposed TS Changes and the Traveler:

TSTF-5 deleted ISTS Safety Limit (SL) Violation Action 2.2.3, which required notifying the NRC Operations Center within 1 hour in accordance with 10 CFR 50.72; Action 2.2.4, which required notifying the [Plant Superintendent and Vice President - Nuclear Operations] within 24 hours; Action 2.2.5, which required submitting a Licensee Event Report to the NRC, the [offsite review function], and the [Plant Superintendent, and Vice President - Nuclear Operations] pursuant to 10 CFR 50.73 within 30 days; and Action 2.2.6, which stated that operation of the unit shall not be resumed until authorized by the NRC.

St. Lucie Unit 2 Section 2.1, Safety Limits, Specification 2.1.1.1, Action, and Specification 2.1.2, Action, state that if the applicable Safety Limit has been exceeded the plant is to be in hot standby within 1 hour and then comply with the requirements of Specification 6.7.1, Safety Limit Violation. The St. Lucie Unit 1 TS Safety Limit actions do not reference Specification 6.7.1.

Units 1 and 2 Specification 6.7.1, Safety Limit Violation, requires notifying the NRC Operations Center by telephone as soon as possible and in all cases within one hour, notifying the Chief Nuclear Officer (CNO) and the Company Nuclear Review Board (CNRB) within 24 hours, preparing and having reviewed by the Facility Review Group a Safety Limit Violation Report, and submitting the Safety Limit Violation Report to the NRC, to the CNRB, and the CNO within 14 days of the violation, and prohibits critical operation of the unit until authorized by the NRC.

The Units 1 and 2 Technical Specifications require preparation of a safety limit violation report instead of a Licensee Event Report (LER) and do not explicitly reference 10 CFR 50.72 and 10 CFR 50.73. Units 1 and 2 Specification 6.7.1 states that the Safety Limit Violation Report shall describe the applicable circumstances preceding the violation, effects of the violation upon facility components, systems, or structures, and corrective action taken to prevent recurrence. However, 10 CFR 50.36(c)(l)(i)(A) explicitly references 10 CFR 50.72 and 10 CFR 50.73 and requires reporting safety limit

violations in accordance with 10 CFR 50.73, (i.e, an LER). Therefore, should a safety limit violation occur, an LER would be submitted to the NRC and the LER would be considered to fulfill the requirement to submit a safety limit violation report. The contents of an LER are equivalent to the required content of the safety limit violation report. therefore, eliminating the TS requirement to submit a Safety Limit Violation Report is an administrative change.

The ISTS requirements that were deleted by TSTF-5 and the St. Lucie Units 1 and 2 TS requirements are equivalent. The remaining St. Lucie TS and ISTS Safety Limit Violation actions are equivalent.

Justification: This change deletes requirements from TS that are duplicative or contained in other regulations or required to comply with regulations, as described below:

Title 10 of the Code of Federal Regulations, Part 50.36(c)(l)(i)(A) states, in part:

> "If any safety limit is exceeded, the reactor must be shut down. The licensee shall notify the Commission, review the matter, and record the results of the review, including the cause of the condition and the basis for corrective action taken to preclude recurrence. Operation must not be resumed until authorized by the Commission. The licensee shall retain the record of the results of each review until the Commission terminates the license for the reactor, except for nuclear power reactors licensed under § 50.21(b) or § 50.22 of this part. For these reactors, the licensee shall notify the Commission as required by § 50.72 and submit a Licensee Event Report to the Commission as required by § 50.73."

Specification 6.7.1.a requires in part that the NRC Operations Center be notified by telephone as soon as practical and in all cases within one hour after a safety limit has been violated. This part of the specification duplicates 10 CFR 50.36(c)(1)(i)(A) and 10 CFR 50.72. 10 CFR 50.36(c)(1)(i)(A) requires notifying the Commission in accordance with 10 CFR 50.72 if any safety limit is exceeded.

Specification 6.7.1.a also requires that the CNO and the CNRB be notified within 24 hours of a safety limit violation. The 24-hour limit to inform the CNO and the CNRB may be deleted without significant consequence because an event as significant as the violation of a safety limit will be reported to company management and the review board in accordance with company policies and procedures. The timing and reporting to management and internal oversight organizations is a company-internal procedural issue not appropriate for the Technical Specifications.

Specification 6.7.1.b requires a safety limit violation report to be prepared and reviewed by the Facility Review Group. This specification duplicates the requirements of 10 CFR 50.36(c)(l)(i)(A) which requires the submission of an LER to the Commission as

required by 10 CFR 50.73 and by 10 CFR 50.73 (a)(2)(i)(A), which requires the submittal of an LER for: "The completion of any nuclear plant shutdown required by the plant's Technical Specifications." Use of an LER instead of a safety limit violation report is an administrative change as the information requirements are equivalent and the regulations require the submission of an LER pursuant to 10 CFR 50.73. Use of the 10 CFR 50.73 requirements for submitting the report is appropriate as the regulations reflect the NRC desired reporting criteria.

Specification 6.7.1.b requires the safety limit violation report to be reviewed by the Facility Review Group. As stated above, the safety limit violation report is being replaced with an LER. The Topical Quality Assurance Report (TQAR) requires the Facility Review Group to review all reportable events (LERs) (which are defined in the TS as any of those conditions specified in Section 50.73 to 10 CFR Part 50) prior to submission to the NRC. Deleting this requirement from the Technical Specifications is acceptable, as it is a company-internal review requirement more appropriate for inclusion in the TQAR.

Specification 6.7.1.c requires in part that the safety limit violation report be submitted to the Commission within 14 days. This is in conflict with the requirements of 10 CFR 50.36(c)(l)(i)(A). 10 CFR 50.36(c)(l)(i)(A) requires reporting in accordance with 10 CFR 50.73 and 10 CFR 50.73 requires submission of an LER within 60 days following the event. NRC regulations address reporting requirements for Safety Limit Violations. Additional reporting requirements do not have to be specified in the TS.

Specification 6.7.1.c also requires that the safety limit violation report be submitted to the CNRB and the CNO within 14 days after discovery of the event. The TQAR and Chapter 13 of the St. Lucie Units 1 and 2 Updated Final Safety Analysis Reports (UFSARs) describes the process for on-site and off-site safety committee reviews of reportable events. The timing of reporting to management and internal oversight organizations is a company-internal procedural issue not appropriate for the Technical Specifications.

Specification 6.7.1.d requires that critical operation of the unit shall not be resumed until authorized by the NRC. This specification duplicates the requirements of 10 CFR 50.36(c)(1)(i)(A) which requires that "Operation must not be resumed until authorized by the Commission" if any safety limit is exceeded.

As discussed above, the justification presented in the Traveler is applicable to St. Lucie. The Traveler is being adopted by St. Lucie with no significant changes.

St. Lucie Units 1 and 2 TS Pages Affected

Unit 1 Index page xv
Unit 1 6-12
Unit 1 6-13
Unit 2 Index page XIX

Unit 2 2-1
Unit 2 6-13

St. Lucie Units 1 and 2 TS Bases Pages Affected: None

Licensing Precedent: Grand Gulf Unit 1 requested adoption of TSTF-5, Revision 1, on August 20, 1999. It was approved by the NRC on June 30, 2000 as Amendment 142.

Traveler Title: TSTF-65, Revision 1, Use of Generic Titles for Utility Positions.

NRC Approval: December 2, 1997 as referenced in the NRC Safety Evaluation contained in the letter from G. S. Shukla (NRC) to G. M. Rueger (PSE&G) dated March 7, 2001.

Description of Proposed St. Lucie TS Change: The proposed change revises the plant-specific management titles in the Technical Specifications to generic titles. The plant-specific titles are specified in the UFSAR or Topical Quality Assurance Report (TQAR). The specifications affected by this proposed change are 6.1, "Responsibility," 6.2, "Organization," 6.3, "Unit Staff Qualifications," 6.4, "Training," 6.6, "Reportable Event Action," 6.13, "Process Control Program (PCP)," and 6.14, "Offsite Dose Calculation Manual (ODCM)."

Comparison of the St. Lucie TS Requirements to the ISTS and Differences Between the Proposed TS Changes and the Traveler:

TSTF-65 revised the ISTS to replace plant-specific titles with generic titles. The change eliminated the need for license amendments to reflect revised titles but did not change the Technical Specification related responsibilities for these positions. TSTF-65 replaced the bracketed (i.e., varies by plant) title of "Plant Superintendent" with the term "plant manager," the bracketed phrase "a specified corporate executive position" with "a specified corporate officer," the bracketed phrase "Health Physics Technician" with "radiation protection technician," the bracketed phrase "Radiation Protection Manager" with "radiation protection manager," and the bracketed phrase "Operations Manager or Assistant Operations Manager" with "operations manager or assistant operations manager." TSTF-65 also added a statement to Section 5.2.1, "Onsite and Offsite Organizations" to state that the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in the Technical Specifications are documented in the UFSAR or TQAR.

The St. Lucie Units 1 and 2 TS are being revised to replace the plant-specific titles with generic titles. The title "Plant General Manager" is being replaced with "plant manager," the title, "Chief Nuclear Officer" is being replaced with "a specified corporate officer" or "corporate officer with responsibility for overall plant nuclear safety," the title "Site Vice President" is being replaced with "a corporate officer with direct responsibility for the plant," the title "Health Physics Supervisor" is being replaced with "radiation protection manager," the title "Operations Supervisor" is being replaced with "operations supervisor." The St. Lucie Units 1 and 2 TS requirements containing these titles are comparable with the corresponding requirements in the ISTS. A requirement is being added to Specification 6.2.1.a which states that the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications shall be documented in the UFSAR or the Topical Quality Assurance Report. In order to be consistent with the changes made in TSTF-65, the title "Training Manager" in Specification 6.4.1 is replaced with the generic title "training manager" and

"Health Physics technician" (which could be construed as an organizational name) is replaced with the generic title "health physics technician."

The ISTS requirements affected by this Traveler and the revised St. Lucie Units 1 and 2 TS requirements are equivalent.

Justification: St. Lucie Units 1 and 2 Specification 6.3.1 states that the facility staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978 and provides specific exceptions for some positions. The proposed change provides a direct link between ANSI/ANS 3.1-1978 and the personnel requirements in the Technical Specifications by utilizing the same position titles as those used in ANSI/ANS 3.1-1978 or alternative titles consistent with ANSI/ANS 3.1-1978 required because of unique organizational structures. The plant-specific titles will be specified in the UFSAR or the Topical Quality Assurance Report and will be maintained and revised using the procedures for modifying or revising the UFSAR or the Topical Quality Assurance Report. The UFSAR will be updated in accordance with 10 CFR 50.71(e), and the Topical Quality Assurance Report will be updated in accordance with 10 CFR 50.54(a), as appropriate.

The proposed change does not eliminate any of the qualifications, responsibilities, or requirements for these positions, since the plant-specific personnel titles currently specified in the Technical Specifications will be identified in the UFSAR or Topical Quality Assurance Report.

As discussed above, the justification presented in the Traveler is applicable to St. Lucie. The Traveler is being adopted by St. Lucie with no significant changes.

The text on Unit 1 TS pages 6-5 and 6-6 has also been reformatted.

St. Lucie Units 1 and 2 TS Pages Affected:

Unit 1 6-1
Unit 1 6-5
Unit 1 6-6
Unit 1 6-12
Unit 1 6-23
Unit 2 6-1
Unit 2 6-2
Unit 2 6-6
Unit 2 6-7
Unit 2 6-13
Unit 2 6-23

St. Lucie Units 1 and 2 TS Bases Pages Affected: None

Licensing Precedent: Diablo Canyon Units 1 and 2 requested adoption of TSTF-65, Revision 1, on December 6, 2000. The request was approved by the NRC on March 7, 2001 as Amendments 80 and 145.

Traveler Title: TSTF-101, Revision 0, Change AFW pump testing frequency to be in accordance with the Inservice Testing Program

NRC Approval: Letter from C. I. Grimes (NRC) to J. Davis (NEI) dated September 27, 1996.

Description of Proposed St. Lucie TS Change: The proposed change to TS 3/4.7.1.2, Auxiliary Feedwater System, revises the surveillance frequency for the Auxiliary Feedwater (AFW) pumps from 31 days to a frequency set by the inservice testing (IST) program, and removes the specific discharge pressures. Procedural details are also being deleted from the surveillance requirements.

Comparison of the St. Lucie TS Requirements to the ISTS and Differences Between the Proposed TS Changes and the Traveler

TSTF-101 revised ISTS 3.7.5, Auxiliary Feedwater System. Surveillance Requirement (SR) 3.7.5.2 requires verifying the developed head for each AFW pump at the flow test point is greater than or equal to the required developed head. TSTF-101 revised the surveillance frequency from 31 days on a staggered test basis to a frequency set by the IST Program. The ISTS surveillance also contains a note which states that the surveillance test is not required to be performed for the turbine driven AFW pump until [24 hours] after ≥[800] psig in the steam generators. The purpose of the note is to allow entering the mode of applicability to establish the necessary conditions to perform the test.

Unit 1 Surveillance Requirements 4.7.1.2.a.1 and a.2 require testing the motor driven and steam turbine driven AFW pumps at least once per 31 days and verifying that the discharge pressure is ≥1342 psig on recirculation flow. Unit 1 TS Surveillance Requirement 4.7.1.2.a.2 is modified by a note that states that when not in Modes 1, 2, or 3, the surveillance test shall be performed within 24 hours after entering Mode 3 and prior to entering Mode 2. The purpose of the note is to allow entering the mode of applicability without performing the test in order to establish the necessary test conditions. This is an implied exception to Specification 4.0.4.

Unit 2 Surveillance Requirements 4.7.1.2.a.1 and a.2 require testing the motor driven and steam turbine driven AFW pumps at least once per 31 days and verifying the discharge pressure is ≥1270 psig on recirculation flow for the motor driven pumps and ≥1260 psig on recirculation flow for the turbine-driven pump when the secondary steam supply pressure is greater than 50 psig. Surveillance Requirement 4.7.1.2.a.2 states that the provisions of Specification 4.0.4 are not applicable for entry into Mode 3. The purpose of the note is to allow entering the mode of applicability without performing the test in order to establish the necessary test conditions.

These surveillance tests are being replaced by a surveillance requirement consistent with ISTS SR 3.7.5.2. The revised SR requires testing the AFW pumps and verifying

that the developed head of each AFW pump at the flow test point is greater than or equal to the required developed head when tested in accordance with the IST Program. The St. Lucie Units 1 and 2 SRs are being modified by a statement allowing an exception to Specification 4.0.4 when performing the steam turbine driven AFW pump surveillance test and stating that the surveillance test must be performed within 24 hours after entering Mode 3 and before entering Mode 2. Specification 4.0.4 states, "Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with a Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to OPERATIONAL MODES as required to comply with ACTION requirements." The exception to Specification 4.0.4 is equivalent to the ISTS note to allow entering the mode of applicability in order to establish the conditions to perform the surveillance test. This note explicitly states the Specification 4.0.4 exception similar to the Unit 2 TS and provides a time limit to perform the test similar to the Unit 1 Technical Specifications and the ISTS.

The ISTS ssurveillance requirement affected by this Traveler and the revised St. Lucie surveillance requirements are equivalent.

Justification: This change will result in the testing frequency of the AFW pumps being in accordance with the inservice testing program consistent with other pumps required by the Technical Specifications, such as charging pumps, boric acid pumps, safety injection pumps, and containment spray pumps. This will eliminate any potential ambiguity associated with AFW pump testing as a result of ASME changes, and results in consistent presentation of pump testing throughout the Technical Specifications. This frequency for testing AFW pumps is consistent with the ASME Code requirements. Such inservice tests confirm component operability, trend performance, and detect incipient failures by indicating abnormal performance.

The other changes to the surveillance make the testing requirements consistent with the pump testing requirements in the ISTS.

As discussed above, the justification presented in the Traveler is applicable to St. Lucie. The Traveler is being adopted by St. Lucie with no significant changes.

St. Lucie Units 1 and 2 TS Pages Affected
Unit 1 3/4 7-4
Unit 1 3/4 7-5
Unit 2 3/4 7-4
Unit 2 3/4 7-5

St. Lucie Units 1 and 2 TS Bases Pages Affected: None

Licensing Precedent: There are no identified previous licensing actions for individual adoption of TSTF-101. However, many plants that have converted to the ISTS have adopted TSTF-101 during conversion. For example, North Anna Units 1 and 2 submitted a license amendment request to convert to the ISTS on December 11, 2000. The request was approved by the NRC in a letter dated April 5, 2002 as Amendments 232 and 212.

Traveler Title: TSTF-258, Revision 5, Changes to Section 5.0, Administrative Controls

NRC Approval: Letter from W. D. Beckner (NRC) to J. Davis (NEI) dated June 29, 1999.

Description of Proposed St. Lucie TS Change: The proposed change revises the Administrative Controls section of the Technical Specifications to adopt several improvements to unit staffing, the radioactive effluent controls program, reporting, and high radiation area requirements.

Comparison of the St. Lucie TS Requirements to the ISTS and Differences Between the Proposed TS Changes and the Traveler

TSTF-258 made seven changes to the Administrative Controls section of the ISTS.

- It deleted requirements for a licensed operator to be present in the control room when fuel is in the reactor vessel and for a senior licensed operator to be in the control room when either unit is in Modes 1, 2, 3, or 4 in ISTS 5.2.2.
- It eliminated details from working hour limitations from ISTS 5.2.2.
- It clarified the requirements for the shift technical advisor function in ISTS 5.2.2.
- It modified the unit staff requirements in ISTS 5.3 to add elements required to be in the Technical Specifications by 10 CFR 55.4.
- It revised the radioactive effluent controls program in ISTS 5.5.4 to be consistent with 10 CFR 20 and to make other improvements.
- It revised the Monthly Operating Report in ISTS 5.6.4 to eliminate the requirement to report challenges to the pressurizer power operated relief valves and safety valves.
- It revised the high radiation area requirements in ISTS 5.7 based on 10 CFR 20 and the letter from C. Grimes (NRC) to J. Davis (NEI) dated April 9, 1997.

St. Lucie Units 1 and 2 Specification 6.2.2.b contains the requirements for at least one licensed operator to be in the control room when fuel is in the reactor and for at least one senior licensed operator to be in the control room when the unit is in Mode 1, 2, 3, or 4. These are the same requirements deleted by TSTF-258. The TS requirements are being deleted to be consistent with the ISTS and the changes made in TSTF-258.

St. Lucie Units 1 and 2 Specification 6.2.2.f contains the same working hour limitations presented in TSTF-258. Therefore, incorporation of this portion of TSTF-258 is not necessary for the corresponding St. Lucie Units 1 and 2 TS to be consistent with the ISTS.

St. Lucie Units 1 and 2 Specification 6.2.3, Shift Technical Advisor, contains requirements on the responsibilities and qualifications of the engineering expertise on shift. The TS requirements are being revised to be consistent with the ISTS and the changes made in TSTF-258. These changes include revising the Section title from "Shift Technical Advisor" to "Shift Technical Advisor Function" and adding the

requirement that the individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

St. Lucie Units 1 and 2 Specification 6.3, Unit Staff Qualifications, is being modified to include a statement that a senior licensed operator performs the functions described in 10 CFR 50.54(m). This change is administrative and establishes consistency with 10 CFR 55.4. This change is consistent with the addition to the ISTS made by TSTF-258.

St. Lucie Units 1 and 2 Specifications 6.8.4.f, Radioactive Effluent Controls Program, requirements are consistent with the ISTS radioactive effluent controls program requirements except that TSTF-258 applied the provisions of Specifications 4.0.2 and 4.0.3 to the surveillance frequencies. The Units 1 and 2 TS radioactive effluent controls program is being revised to incorporate the provisions of Specification 4.0.2 and 4.0.3 consistent with the ISTS and the changes made by TSTF-258. Additionally, Specification 6.8.4.f.10 is being revised to include an editorial clarification that does not change the intent of the requirement and to be more consistent with the ISTS and the changes made by TSTF-258.

St. Lucie Units 1 and 2 Specification 6.9.1.6, Monthly Operating Reports, contains a requirement to document all challenges to the power operated relief valves (PORVs) or safety valves. TSTF-258 eliminated this requirement. The TS requirements are being revised to be consistent with the ISTS and the changes made by TSTF-258.

St. Lucie Units 1 and 2 Specification 6.12, High Radiation Area, requirements are consistent with the ISTS high radiation area requirements that were replaced by TSTF-258. St. Lucie Specification 6.12 is not being revised at this time.

The affected ISTS requirements and the revised St. Lucie TS requirements are equivalent.

Justification: TSTF-258 deleted requirements in ISTS 5.2.2 for a licensed operator to be present in the control room when fuel is in the reactor vessel and for a senior licensed operator to be in the control room when either unit is in Modes 1, 2, 3, or 4. These requirements appear in St. Lucie Units 1 and 2 Specification 6.2.2.b. The deleted requirements are not needed in the Technical Specifications, as they are already required by the Code of Federal Regulations. The requirements of 10 CFR 50.54(m)(2)(iii) and 50.54(k) adequately provide for shift manning. These regulations, 50.54(m)(2)(iii), require "when a nuclear power unit is in an operational mode other than cold shutdown or refueling, as defined by the unit's technical specifications, each licensee shall have a person holding a senior operator license for the nuclear power unit in the control room at all times. In addition to this senior operator, for each fueled nuclear power unit, a licensed operator or senior operator shall be present at the controls at all times." Further, 50.54(k) requires "An operator or senior operator licensed pursuant to part 55 of this chapter shall be present at the controls at all times during the

operation of the facility." The requirements will be met through compliance with these regulations and are not required to be reiterated in the Technical Specifications.

TSTF-258 eliminates details from working hour limitations from ISTS 5.2.2. St. Lucie Units 1 and 2 Specification 6.2.2.f currently contains the changes made in TSTF-258. As a result, incorporation of this portion of TSTF-258 is not necessary in order for the St. Lucie TS to be consistent with TSTF-258 and the ISTS.

TSTF-258 clarified the requirements for the shift technical advisor function in ISTS 5.2.2. St. Lucie Units 1 and 2 Specification 6.2.3 is being revised to adopt the ISTS requirements, including the changes made in TSTF-258, for the shift technical advisor (STA) function. Option 1 of the Commission Policy Statement on engineering expertise on shift is satisfied by assigning an individual with specified educational qualifications to each operating crew as one of the SROs (preferably the shift supervisor) required by 10 CFR 50.54(m)(2)(i) to provide the technical expertise on shift. This change is also consistent with note [*] of Table 6.2-1, "Minimum Shift Crew Composition." A statement is being added that the individual performing the shift technical advisor function must meet the qualifications of the Commission's Policy Statement on engineering expertise on shift consistent with the requirements of the ISTS.

TSTF-258 modified the unit staff requirements of ISTS 5.3 to add elements required to be in the Technical Specifications by 10 CFR 55.4. The definitions in 10 CFR 55.4 state: "Actively performing the functions of an operator or senior operator means that an individual has a position on the shift crew that requires the individual to be licensed as defined in the facility's technical specifications, and that ...." TSTF-258 added to ISTS 5.3, "For the purpose of 10 CFR 55.4, a licensed Senior Operator and a licensed reactor operator are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m)." A similar paragraph is being added to St. Lucie Specification 6.3. Adding a paragraph to Specification 6.3 referencing 10 CFR 55.4 ensures that there is no misunderstanding when complying with 10 CFR 55.4 requirements. Adding this paragraph is consistent with the recommendations in the April 9, 1997 letter from C. Grimes (NRC) to J. Davis (NEI).

TSTF-258 revised the radioactive effluent controls program in ISTS 5.5.4 to be consistent with 10 CFR 20 and to make other improvements. St. Lucie Units 1 and 2 Specification 6.8.4.f, Radioactive Effluent Controls Program, requirements are consistent with the ISTS radioactive effluent controls program requirements with the exception that TSTF-258 applied the provisions of Specification 4.0.2 and 4.0.3 to the surveillance frequency. The provisions of Specification 4.0.2 are being applied to the radioactive effluent controls program surveillance frequencies to allow for scheduling flexibility. Specification 4.0.2 permits a 25% extension of the specified frequency (31 days). Allowing a 25% extension of the frequency of performing the cumulative dose and projected dose calculation will have no affect on the outcome of the calculations. The provisions of Specification 4.0.3 are also being applied to the radioactive effluent controls program. Specification 4.0.3 specifies the requirements if a surveillance

requirement is missed. Adding these requirements to the radiological effluent controls program establishes consistency with the other surveillance requirements in the TS, and is consistent with the ISTS and the changes made by TSTF-258. Also, an editorial change is made to 6.8.4.f.10 to clarify that the limits on annual dose or dose commitment to any member of the public applies only to those members of the public "beyond the site boundary." This is consistent with the TSTF-258, the ISTS, and the recommendations in the April 9, 1997 letter from C. Grimes (NRC) to J. Davis (NEI).

TSTF-258 revised the monthly operating report requirements in ISTS 5.6.4 to eliminate the requirement to report challenges to the pressurizer power operated relief valves (PORVs) and safety valves. The reporting of pressurizer safety and relief valve failures and challenges is based on the guidance of NUREG-0694, TMI-Related Requirements for New Operating Licensees. This guidance states, Assure that any failure of a PORV or safety valve to close will be reported to the NRC promptly. All challenges to the PORVs or safety valves should be documented in the annual report. NRC Generic Letter 97-02, Revised Contents of the Monthly Operating Report, requested the submittal of less information in the monthly operating report. The generic letter specifies information that needs to be reported to support the NRC performance indicator program, and availability and capacity statistics. The generic letter does not specify that challenges to the pressurizer PORVs and safety valves should be reported. Given that the NRC no longer requires the reporting of this information for the performance indicator program, it is acceptable to delete the requirement to provide documentation of all challenges to the PORVs or safety valves from Specification 6.9.1.6.

As discussed above, the justification presented in the Traveler is applicable to St. Lucie. The Traveler is being adopted by St. Lucie with no significant changes.

The text on Unit 1 TS pages 6-5, 6-6, and 6-15a has also been reformatted.

St. Lucie Units 1 and 2 TS Pages Affected:

Unit 1 xiv
Unit 1 6-2
Unit 1 6-5
Unit 1 6-6
Unit 1 6-15a
Unit 1 6-16a
Unit 2 xviii
Unit 2 6-2
Unit 2 6-6
Unit 2 6-15b
Unit 2 6-17

St. Lucie Units 1 and 2 TS Bases Pages Affected: None

Licensing Precedent: Calvert Cliffs Units 1 and 2 requested adoption of TSTF-258, Revision 4, on June 11, 2002. The request was approved by the NRC on July 16, 2003 as Amendments 259 and 236.

Traveler Title: TSTF-299, Revision 0, Administrative Controls Program 5.5.2.b Test Interval and Exception

NRC Approval: Letter from W. D. Beckner (NRC) to A. R. Pietrangelo (NEI) dated October 31, 2000.

Description of Proposed St. Lucie TS Change: The proposed change clarifies the meaning of "refueling cycle" for system integrated leak test intervals in the Primary Coolant Sources Outside Containment program in Specification 6.8.4.a. In addition, the proposed change also specifies that the provisions of Specification 4.0.2 are applicable to these test intervals.

Comparison of the St. Lucie TS Requirements to the ISTS and Differences Between the Proposed TS Changes and the Traveler

TSTF-299 revised the primary coolant sources outside containment program in ISTS 5.5.2. The primary coolant sources outside containment program requires that the program include integrated leak test requirements for each system at refueling cycle intervals or less. TSTF-299 revised the program to require the integrated leak test requirements for each system at least every 18 months. In addition, the program was modified to state that the requirements of Surveillance Requirement 3.0.2 are applicable.

St. Lucie Units 1 and 2 Specification 6.8.4.a, Primary Coolant Sources Outside Containment, is consistent with the program in the ISTS and contains the same requirements. The St. Lucie program is being revised to require testing at least every 18 months instead of refueling cycle intervals or less. The program is also being revised to specify that the requirements of Specification 4.0.2 are applicable. Specification 4.0.2 is equivalent to ISTS Surveillance Requirement 3.0.2. Both allow the frequency of testing to be extended by 25%.

The ISTS requirements affected by this Traveler and the revised St. Lucie TS requirements are equivalent.

Justification: The fixed testing frequency of 18 months is more precise than the existing frequency of at least once per refueling cycle and is more consistent with similar requirements in the St. Lucie TS. The system leak testing is similar to a surveillance requirement. Specification 4.0.2 permits surveillance requirement frequencies to be extended by 25%. For consistency with the other surveillance requirements, the provisions of Specification 4.0.2 are being applied to the system leak testing. The applicability of Specification 4.0.2 must be explicitly stated in Specification 6.8.4.a because Specification 4.0.2 only applies to the surveillance requirement sections. The Specification 4.0.2 provision also provides the needed flexibility to perform the leak testing during a refueling outage should the previous fuel cycle be extended due to a lengthy forced shutdown. The revised test interval combined with the

provisions of Specification 4.0.2 is equivalent to the existing requirement, provided the interval between refueling outages is no greater than 22.5 months (18 months plus 25%) for plants on an 18 month fuel cycle. As St. Lucie Units 1 and 2 are on an 18 month fuel cycle, this change is administrative.

As discussed above, the justification presented in the Traveler is applicable to St. Lucie. The Traveler is being adopted by St. Lucie with no significant changes.

St. Lucie Units 1 and 2 TS Pages Affected:

Unit 1 6-14
Unit 2 6-14a

St. Lucie Units 1 and 2 TS Bases Pages Affected: None

Licensing Precedent: Calvert Cliffs Units 1 and 2 requested adoption of TSTF-299, Revision 0, on June 11, 2002. The request was approved by the NRC on July 16, 2003 as Amendments 259 and 236.

Traveler Title: TSTF-308, Revision 1, Determination of Cumulative and Projected Dose Contributions in RECP

NRC Approval: June 27, 2000 as referenced in the NRC Safety Evaluation contained in the letter from G. S. Vissing (NRC) to P. E. Katz (Calvert Cliffs) dated July 16, 2003.

Description of Proposed St. Lucie TS Change: The proposed change to Specification 6.8.4.f, Radioactive Effluent Controls Program, clarifies the requirements for the determination of cumulative and projected dose contributions from radioactive effluents.

Comparison of Units 1 and 2 TS Requirements to ISTS and Differences Between the Proposed Changes and the Traveler

TSTF-308 revised the radioactive effluent controls program requirements for the determination of cumulative and projected dose contributions to describe the actual intent of the requirement (ISTS 5.5.4.e). The ISTS stated, "Determination of cumulative and projected dose contributions from radioactive effluent for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the Offsite Dose Calculation Manual (ODCM) at least every 31 days." TSTF-308 revised the requirement to state, "Determination of cumulative dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days."

St. Lucie Units 1 and 2 Technical Specification 6.8.4.f, Radioactive Effluent Controls Program, is consistent with the program in the ISTS. The current paragraph (6.8.4.f.5) regarding determination of cumulative and projected dose contributions from radioactive effluents is worded the same as the paragraph that was revised by TSTF-308. The wording being adopted in the St. Lucie TS is consistent with the change made by TSTF-308.

The ISTS radioactive effluent controls program requirements affected by this Traveler and the revised St. Lucie TS requirements are equivalent.

Justification: TSTF-308 was proposed because there was concern that the text of this requirement can be misinterpreted to require determining projected dose contribution for the current calendar quarter and current calendar year every 31 days. The current St. Lucie wording was specified in Generic Letter 89-01, Implementation of Programmatic Controls for Radiological Effluent Technical Specifications (RETSs) in the Administrative Controls Section of the Technical Specifications and the relocation of procedural details of retss to the offsite dose calculation manual or to the process control program. Generic Letter 89-01 provided new programmatic controls for radioactive effluents and radiological environmental monitoring that were to be incorporated into the TS to

conform to the requirements of 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I of 10 CFR Part 50. The pre-Generic Letter 89-01 requirements required determining the cumulative dose contributions every 31 days, and required determining projected dose contributions every 31 days, but did not require determining projected dose contributions for the current calendar quarter and current calendar year every 31 days.

The NRC Staff's draft standard technical specifications for 4-loop Westinghouse plants (documented in a August 14, 1987 letter to Texas Utilities) included Radioactive Effluent Technical Specifications. Surveillance 4.11.1.2 for liquid effluents states, "Cumulative dose contributions from liquid effluents for the current calendar quarter and the current calendar year shall be determined in accordance with the methodology and parameters in the Offsite Dose Calculation Manual (ODCM) at least once per 31 days." Surveillance 4.11.1.3.1 for the liquid radioactive waste treatment system states, "Doses due to liquid releases from each unit to unrestricted areas shall be projected at least once per 31 days in accordance with the methodology and parameters in the ODCM when liquid radioactive waste treatment systems are not being fully utilized."

Generic Letter 89-01 appears to have combined these two surveillance requirements for cumulative and projected doses. In combining these requirements in Generic Letter 89-01, the new program element can be interpreted to require determining projected dose contribution for the current calendar quarter and current calendar year every 31 days. This was not the NRC's intention. TSTF-308 clarified the requirement by stating, "Determination of cumulative dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days."

As discussed above, the justification presented in the Traveler is applicable to St. Lucie. The Traveler is being adopted by St. Lucie with no significant changes.

The text on Unit 1 TS page 6-15a has also been reformatted.

St. Lucie Units 1 and 2 TS Pages Affected

Unit 1 6-15a
Unit 2 6-15a

St. Lucie Units 1 and 2 TS Bases Pages Affected: None

Licensing Precedent: Calvert Cliffs Units 1 and 2 requested adoption of TSTF-308, Revision 1, on June 11, 2002. The request was approved by the NRC on July 16, 2003 as Amendments 259 and 236.

Traveler Title: TSTF-361, Revision 2, Allow Standby SDC/RHR/DHR Loop to be Inoperable to Support Testing

NRC Approval: Letter from W. D. Beckner (NRC) to A. R. Pietrangelo (NEI) dated October 31, 2000.

Description of Proposed St. Lucie TS Change: The proposed change adds a note to the shutdown cooling (SDC) requirements during Mode 6 low water level operations (TS 3.9.8.2) which allows one required SDC loop to be inoperable for up to two hours for surveillance testing provided the other SDC loop is operable and in operation.

Comparison of the St. Lucie TS Requirements to the ISTS and Differences Between the Proposed TS Changes and the Traveler

TSTF-361 revised ISTS LCO 3.9.5, Shutdown Cooling (SDC) and Coolant Circulation - Low Water Level, which requires two SDC loops to be operable and one loop to be in operation in Mode 6 when the water level less than 23 feet above the top of the reactor vessel flange. An LCO note is added which allows one of the required SDC loops to be inoperable for up to two hours for required surveillance testing provided the other loop is operable and in operation.

St. Lucie Unit 1 Technical Specification 3.9.8.2 requires two independent SDC loops to be operable and at least one loop to be in operation in Mode 6 when the water level above the top of irradiated fuel assemblies seated within the reactor vessel is less than 23 feet. Unit 2 Technical Specification 3.9.8.2 requires two independent SDC loops to be operable and at least one loop to be in operation in Mode 6 when the water level above the top of the reactor vessel flange is less than 23 feet. A footnote is being added which allows one required SDC loop to be inoperable for up to two hours for surveillance testing, provided that the other SDC loop is operable and in operation.

The ISTS requirements affected by this Traveler and the revised St. Lucie TS requirements are equivalent.

Justification: St. Lucie Units 1 and 2 Specification 3.9.8.2 currently does not allow the non-operating SDC loop to be made inoperable to support surveillance testing. The St. Lucie Units 1 and 2 SDC specifications applicable in Mode 5, Specification 3.4.1.4.1, Cold Shutdown - Loops Filled, and 3.4.1.4.2, Cold Shutdown - Loops Not Filled, contain the footnote being added to Specification 3.9.8.2. The allowance is needed in Specification 3.9.8.2 to provide the flexibility to perform surveillance testing while ensuring that there is reasonable time for operators to respond to and mitigate any expected failures. Therefore, for consistency, and to support required outage activities and still maintain the plant in a safe condition, this footnote should be added to Specification 3.9.8.2.

As discussed above, the justification presented in the Traveler is applicable to St. Lucie. The Traveler is being adopted by St. Lucie with no significant changes.

St. Lucie Units 1 and 2 TS Pages Affected

Unit 1 3/4 9-8a
Unit 2 3/4 9-9

St. Lucie Units 1 and 2 TS Bases Pages Affected

Unit 1 Section 3/4.9.8, Page 7
Unit 2 Section 3/4.9.8, Page 7

Licensing Precedent: Calvert Cliffs Units 1 and 2 requested adoption of TSTF-361, Revision 2, on September 20, 2002. The request was approved by the NRC on February 25, 2003 as Amendments 256 and 233.

ISTS Specification: 3.3.12, Remote Shutdown System

Description of Proposed St. Lucie TS Change: The proposed change will revise St. Lucie Unit 1 Specification 3.3.3.5, Remote Shutdown Instrumentation, and Unit 2 Specification 3.3.3.5, Remote Shutdown System Instrumentation, to make the requirements consistent with the requirements in ISTS 3.3.12, Remote Shutdown System.

Comparison of the St. Lucie TS Requirements to the ISTS and Differences Between the Proposed TS Changes and the ISTS

The remote shutdown system (RSS) requirements in Revision 1 of the ISTS were similar to the St. Lucie requirements. However, during adoption of the ISTS by the four BWR/6 plants in the early 1990's (Clinton, Grand Gulf, River Bend, and Perry), the NRC allowed the table of remote shutdown instrument channels and transfer and control switches to be relocated to the Technical Specification Bases. In 1996, the industry proposed a similar generic change to the ISTS for all plant types. This generic change, TSTF-266, Revision 3, was approved by the NRC in a letter to NEI dated September 10, 1999. This change was subsequently incorporated into Revision 2 of the ISTS.

Changes applicable to both the St. Lucie Unit 1 and Unit 2 Technical Specifications are:

- The Specification title is being changed to "Remote Shutdown System." This proposed change is consistent with the ISTS Specification title.

- Table 3.3-9 is being relocated to the Technical Specification Bases. The table is revised to delete the readout location column, the measurement range column (Channels Range for Unit 2), and required number of channels column (Unit 2 only) and to change the column titles to be consistent with the Specification. The title of the table (Unit 1 only) is also being changed to Remote Shutdown System Instrumentation. This proposed change is consistent with the ISTS because the information that is being retained in the table and being relocated to the Bases has been relocated to the ISTS Bases.

- The LCO and Actions are being revised to delete the references to Table 3.3-9. This proposed change is consistent with the ISTS because the ISTS Specification does not refer to ISTS Bases Table B3.3.12-1.

- The Unit 1 Action and Unit 2 Action "a" are being revised to replace references to the number of operable remote shutdown monitoring channels less than the required number of channels shown in Table 3.3-9 with the phrase, "With one or more remote shutdown system functions inoperable." This proposed change is consistent with ISTS Condition A which states, "With one or more required Functions inoperable."

- A new Action "c" is being added which states that separate action entry is allowed for each Function. This proposed change is consistent with the ISTS Action Note which states, "Separate Condition entry is allowed for each Function."

- Table 4.3-6, Remote Shutdown System Surveillance Requirements, is being deleted. The table is being replaced with a presentation of the surveillance requirements in text format. This proposed change is consistent with the ISTS because the ISTS surveillance requirements are presented in text format.

- Editorial changes are being made to enhance the consistency between the Unit 1 and Unit 2 Technical Specifications.

- A new surveillance is being added which requires a Channel Functional Test of the reactor trip breaker open and closed indications at least once per 18 months. This proposed change is consistent with ISTS Surveillance Requirement (SR) 3.3.12.4, which specifies performing a Channel Functional Test of the reactor trip circuit breaker open/closed indication with a Frequency of 18 months.

Changes specific to the Unit 1 Technical Specifications are:

- The LCO is being revised to replace the phrase, "monitoring instrumentation channels," with the term "functions" and to delete the phase, "with readouts displayed external to the control room." The revised LCO states, "The remote shutdown system functions shall be OPERABLE," which is consistent with the ISTS, and

- The existing Action is being reformatted as Action "a" and a new Action "b" is being added which states, "The provisions of Specification 3.0.4 are not applicable." This proposed change is consistent with the ISTS prior to incorporation of TSTF-359, "Increase Flexibility in MODE Restraints." This is appropriate because TSTF-359 has not been adopted by St. Lucie. This provision is also consistent with the current licensing basis for St. Lucie Unit 2 Specification 3.3.3.5, Action "c."

Changes specific to the Unit 2 Technical Specifications are:

- The LCO is being revised to replace the phrase, "transfer switches, control, and instrumentation channels" with the term, "functions." The revised LCO states, "The remote shutdown system functions shall be OPERABLE," which is consistent with the ISTS;

- Action "b" states that with the number of operable remote shutdown channels less than the Minimum Channels operable requirements, restore the inoperable channel to operable status within 7 days or be in Hot Shutdown within the next 12 hours. Action "b" is being deleted. This is consistent with the ISTS because the ISTS does not specify this as a Condition and Required Action;

- The frequency for performing a channel calibration of the power range neutron flux indication is being changed from quarterly to at least once per 18 months. This proposed change is consistent with ISTS Surveillance Requirement SR 3.3.12.3; and

- The channel calibration surveillance is being modified to exclude neutron detectors. This proposed change is consistent with the ISTS surveillance note contained in SR 3.3.12.3, which states, "Neutron detectors are excluded from the CHANNEL CALIBRATION."

The ISTS remote shutdown system requirements and the revised St. Lucie TS requirements are equivalent.

Justification: The remote shutdown system provides the control room operator with sufficient instrumentation and controls to place and maintain the unit in a safe shutdown condition from a location other than the control room. This capability is necessary to protect against the possibility that the control room becomes inaccessible.

The instruments and, in some cases, controls and transfer switches required by the Remote Shutdown System Technical Specification depend on the plant-specific licensing basis. The St. Lucie Unit 1 Technical Specifications list only instruments while the St. Lucie Unit 2 Technical Specifications list instruments, controls, and transfer switches. This is typical of plants of their respective vintages. Retaining these plant-specific differences is consistent with each unit's licensing basis and consistent with adoption of the NUREG-1432 Remote Shutdown System requirements by plants during full conversion to the ISTS (see the referenced precedent).

St. Lucie Unit 1 table of instruments (Table 3.3-9) and the Unit 2 table of instruments, controls, and transfer switches (Table 3.3-9) are being relocated to the Technical Specification Bases. It is unnecessary to list specific instruments, controls, and transfer switches in the Technical Specifications to provide adequate assurance that the functions can be performed. General design criteria (GDC) 19 requires that remote shutdown capability be provided. The LCO provides references to the functions that will be described in the TS Bases. This is sufficient to ensure that the system will be operable. Listing specific instrumentation, controls, and transfer switches is unnecessary and may lead to needless expenditure of licensee and NRC resources processing license amendments to revise the table when the information can be adequately controlled by the licensee. In addition to the relocation, the table columns of location and range are being deleted. This design information is not needed to understand the Specification and is more appropriately maintained in plant design documents.

The Unit 1 and Unit 2 remote shutdown system Technical Specifications place requirements on the number of operable channels. The ISTS remote shutdown system

requirements are based on operable functions. A function is considered operable if at least one channel is available to provide the necessary indication or control. This results in a change to the Unit 1 and Unit 2 LCOs to refer to functions instead of instruments, or control and transfer switches.

St. Lucie Unit 1 Actions state that with the number of operable channels less than required by Table 3.3-9, either restore the inoperable channel to operable status within 30 days or be in hot shutdown within the next 12 hours. Table 3.3-9 requires one channel per instrument. Therefore, for the current requirement, when the instrument is inoperable, the action is to restore the instrument to operable status within 30 days. That is consistent with the proposed action which states that with one or more RSS functions inoperable, restore the function(s) to operable status within 30 days. The current Table 3.3-9 "Instrumentation" designation is being revised to "Function" as described above.

St. Lucie Unit 2 Action "a" states that with the number of operable channels less than the required number of channels in Table 3.3-9, either restore the inoperable channel to operable status within 30 days or be in hot shutdown within the next 12 hours. Action "b" states that with the number of operable channels less than the minimum channels operable requirements restore the inoperable channel to operable status within 7 days or be in hot shutdown within 12 hours. The Unit 2 Actions are being revised to allow 30 days to restore an inoperable function when the required number of divisions for the function are inoperable. The 30 day action time is based on operating experience and the low probability of an event that would require evacuation of the control room. With the change to the Actions, the "Required Number of Channels" column in Table 3.3-9 is no longer needed and is being deleted.

A new Action "c" is being added to the St. Lucie Unit 1 and Unit 2 Technical Specifications, which states, "Separate action entry is allowed for each Function." This means that the action time(s) of the inoperable channel(s) of a function will be tracked separately for each function, starting from the time the action was entered for that function. For example, Table 3.3-9 states that reactor trip breaker indication requires one indication per trip breaker. Should the indication on one reactor trip breaker be inoperable and subsequently a second reactor trip breaker indication become inoperable and the first reactor trip breaker is restored, restoration of the second inoperable indication is allowed the full 30 day action time as tracked from the inoperability of the second indication. This is appropriate because each indication is of a separate component and the inoperability of one indication does not degrade the ability to monitor another component.

St. Lucie Unit 2 Action "b" states that the provisions of Specification 3.0.4 are not applicable. This action allows entry into the modes in the applicability with the requirements of the LCO not met and while relying on the Actions. This action is being added to the Unit 1 Technical Specifications. This action is consistent with the ISTS prior to the incorporation of TSTF-359, "Increase Flexibility in MODE Restraints." St.

Lucie has not adopted TSTF-359. Therefore, this statement is required. This allowance is acceptable because of the low probability of an event requiring the system and because the remote shutdown system components can generally be repaired during operation without affecting the safe operation of the unit.

The format of the St. Lucie Units 1 and 2 surveillance requirements is being revised to be consistent with the presentation in NUREG-1432. Table 4.3-6 is being deleted and the existing surveillance tests are being replaced, as described below.

St. Lucie Unit 1 Surveillance 4.3.3.5 and Unit 2 Surveillance 4.3.3.5.1 require a channel check every month (defined in TS Table 1.1 as 31 days). The proposed Surveillance 4.3.3.5.1 requires a channel check every 31 days for each channel that is normally energized. This will change the surveillance by not requiring performance on channels that are not normally energized. This is consistent with the generic exception in NUREG-1432 which recognizes that in some plant designs energizing a remote shutdown instrument requires de-energizing the corresponding control room indication.

St. Lucie Unit 1 Surveillance 4.3.3.5 and Unit 2 Surveillance 4.3.3.5.1 require a Channel Calibration. The Unit 1 Surveillance requires a channel calibration every refueling (defined in TS Table 1.1 as at least once per 18 months) for all functions except the reactor trip breaker indication. The Unit 2 surveillance requires a channel calibration every refueling for all functions except the power range neutron flux, which is required quarterly, and reactor trip breaker indication. A channel calibration is not required for the reactor trip breaker indication for Units 1 and 2. Proposed Surveillance 4.3.3.5.2 requires a channel calibration to be performed for all functions except the reactor trip breaker indication at least once per 18 months. This will revise the Unit 2 requirements by reducing the frequency of the power range neutron flux channel calibration from quarterly to every 18 months. The power range neutron flux channel is calibrated quarterly by Specification 3.3.1. The channel calibration required by Surveillance 4.3.3.5.2 only ensures that the remote shutdown indication of reactor power is accurate. This calibration frequency is appropriate for this function and is consistent with the surveillance frequency for the other remote shutdown instruments. The Unit 2 proposed channel calibration surveillance states that neutron detectors are excluded from the channel calibration. This is consistent with notes in the Unit 2 Specifications for channel calibration of neutron flux channels and is appropriate because neutron detectors cannot be manipulated to provide a range of outputs as required by the channel calibration definition. The Unit 1 proposed Surveillance does not include this exception as there are no functions which use neutron detectors listed in the Unit 1 table of functions.

A new surveillance is being added to the St. Lucie Unit 1 and Unit 2 TS. Proposed Surveillance 4.3.3.5.3 requires verification of the operability of the reactor trip breaker open/closed indication by performance of a channel functional test every 18 months. This ensures the reactor trip breaker indication is operable on a frequency consistent with the other remote shutdown functions.

St. Lucie Unit 2 Surveillance 4.3.3.5.2 requires verification that each transfer switch and control circuit is operable every 18 months. This requirement is being retained without change as Unit 2 Surveillance 4.3.3.5.4.

As discussed above, the justification for the ISTS 3.3.12 requirements presented in the ISTS Bases is applicable to St. Lucie. These requirements are being adopted by St. Lucie with no significant changes.

St. Lucie Units 1 and 2 TS Pages Affected:

Unit 1 3/4 3-33
Unit 1 3/4 3-34
Unit 1 3/4 3-35
Unit 2 3/4 3-38
Unit 2 3/4 3-39
Unit 2 3/4 3-40

St. Lucie Units 1 and 2 TS Bases Pages Affected:

Unit 1 Bases 3/4.3, Page 4
Unit 2 Bases 3/4.3, Page 5

Licensing Precedent: South Texas Project Units 1 and 2 requested changes to the Technical Specification actions and relocation of the table of remote shutdown channels to the Technical Specifications Bases on November 4, 2003. The request was approved by the NRC on August 20, 2004 as Amendments 163 and 152.

ISTS Specification: 3.3.3, "Post Accident Monitoring"

Description of Proposed St. Lucie TS Change: The proposed changes revise the actions of St. Lucie Unit 1 TS 3.3.3.8 and Unit 2 TS 3.3.3.6, Accident Monitoring Instrumentation, to be consistent with ISTS 3.3.11, Post Accident Monitoring (PAM) Instrumentation.

Comparison of the St. Lucie TS Requirements to the ISTS and Differences Between the Proposed TS Changes and the ISTS

St. Lucie Unit 1 TS 3.3.3.8 and Unit 2 TS 3.3.3.6 are being revised to make the accident monitoring instrumentation actions and action times consistent with the requirements of ISTS 3.3.11, PAM Instrumentation.

The accident monitoring instrumentation requirements in the St. Lucie Unit 1 and Unit 2 TS are similar to the requirements in ISTS 3.3.11 (analog), PAM Instrumentation, in that:

- The ISTS and St. Lucie TS Limiting Conditions for Operation (LCOs) require the instruments to be operable;

- The ISTS and St. Lucie TS applicability is Modes 1, 2, and 3;

- The ISTS provides an exception to LCO 3.0.4. The St. Lucie TS provide an exception to the equivalent Specification 3.0.4; and

- The ISTS and St. Lucie TS require a channel check of each channel at least once per 31 days and a channel calibration of each channel at least once per 18 months.

Changes specific to the Unit 1 Technical Specifications are:

- a new Action "c" is being added which states that separate action entry is allowed for each instrument. This proposed change is consistent with the ISTS actions note which states, "Separate Condition entry is allowed for each Function;"

- Table 3.3-11, Action 4, which applies when the number of operable channels is one less than the total number of channels, requires the inoperable channel to be restored to operable status within 7 days if repairs are feasible without shutting down or submit a special report to the NRC within 30 days following the event. This requirement is being revised to allow 30 days to restore the inoperable channel to operable status or submit a special report to the NRC within the next 14 days. This proposed change is consistent with ISTS Action A.1 which requires restoring the required channel to operable status within 30 days; ISTS Action B.1 which requires initiating action in accordance with Specification 5.6.7 immediately if the required action and associated completion time of Condition A are not met; and ISTS

Specification 5.6.7 which requires submitting a post accident monitoring report within the following 14 days;

- Table 3.3-11, Action 1, which applies when the number of operable channels is one less than the total number of channels, requires the inoperable channel(s) to be restored to operable status within 30 days or be in hot shutdown within the next 12 hours. This requirement is being deleted. References to Action 1 on Table 3.3-11 are being replaced with references to Action 4. This proposed change is consistent with ISTS Actions A.1 and B.1, and ISTS Specification 5.6.7 as described above.

- Table 3.3-11, Action 5, which applies when the number of operable channels is less than the minimum channels operable requirements, requires in part the inoperable channel(s) to be restored to operable status within 48 hours if repairs are feasible without shutting down, or a Special Report be submitted to the NRC within 30 days following the event. This requirement is being revised to allow 7 days to restore an inoperable channel to operable status or submit a special report to the NRC within the next 14 days. This proposed change is consistent with ISTS Action C.1 which requires restoring one channel to operable status within 7 days, ISTS Action F.1 which requires initiating action in accordance with Specification 5.6.7 immediately if the required action and associated completion time of Condition C are not met as specified in Table 3.3.11-1; and ISTS Specification 5.6.7 as described above;

- Table 3.3-11, Action 6, which applies when the number of operable channels is less than the minimum channels operable requirements, requires the inoperable channel(s) to be restored to operable status within 48 hours or the plant to be in hot shutdown within the next 12 hours. This requirement is being revised to allow 7 days to restore an inoperable channel to operable status or be in hot shutdown within the next 12 hours. This proposed change is consistent with ISTS Action C.1 which requires restoring one channel to operable status within 7 days, ISTS Actions E.1 and E.2 which require the unit to be in Mode 3 (Hot Standby) within 6 hours and to be in Mode 4 (Hot Shutdown) within 12 hours if the required action and associated completion time of Condition C are not met as specified in Table 3.3.11-1; and

- Table 3.3-11, Action 7, which applies when the number of operable channels is less than the minimum channels operable requirements, and requires the inoperable channel(s) to be restored to operable status within 72 hours or the plant to be in hot shutdown within the next 12 hours. This requirement is being deleted. References to Action 7 on Table 3.3-11 are being replaced with references to Action 6.

Changes specific to the Unit 2 Technical Specifications are:

- Specification 3.3.3.6, Action "c," applies only to the reactor vessel level monitoring system and containment sump water level (narrow range and wide range) instruments when the number of operable channels is one less than the total number of channels. Action "c" requires restoration of the inoperable channel to operable

status within 7 days if repairs are feasible without shutting down or submission of a special report to the NRC within 30 days following the event. This requirement is being revised to apply to all instruments, and being revised to allow 30 days to restore the inoperable channel to operable status or submit a Special Report to the NRC within the next 14 days. The reference to the "Total Number of Channels" is being changed to the "Required Number of Channels." This proposed change is consistent with ISTS Action A.1 which requires restoring the required channel to operable status within 30 days; ISTS Action B.1 which requires initiating action in accordance with Specification 5.6.7 immediately if the required action and associated completion time of Condition A are not met; and ISTS Specification 5.6.7 which requires submitting a post accident monitoring report within the following 14 days;

- Specification 3.3.3.6, Action "a", applies to all instruments except the reactor vessel level monitoring system and containment sump water level (narrow range and wide range) instruments when the number of operable channels is one less than the required number of channels. Action "a" requires restoration of the inoperable channels to operable status within 7 days or to be in hot shutdown within the next 12 hours. This requirement is being deleted;

- Specification 3.3.3.6, Action "b", applies to all channels except the reactor vessel level monitoring system and containment sump water level (narrow range and wide range) instruments when the number of operable channels is less than the minimum channels operable requirements. Action "b" requires restoration of the inoperable channels to operable status within 48 hours or to be in hot shutdown within the next 12 hours. This requirement is being revised to allow 7 days to restore an inoperable channel to operable status or be in hot shutdown within the next 12 hours. This proposed change is consistent with ISTS Action C.1 which requires restoring one channel to operable status within 7 days, and ISTS Actions E.1 and E.2 which require the plant to be in Mode 3 (Hot Standby) within 6 hours and to be in Mode 4 (Hot Shutdown) within 12 hours if the required action and associated completion time of Condition C are not met as specified in Table 3.3.11-1;

- Specification 3.3.3.6, Action "d", applies to the reactor vessel level monitoring system and containment sump water level (narrow range and wide range) instruments when the number of operable channels is less than the minimum channels operable requirements. Action "d" requires in part restoration of the inoperable channel(s) to operable status within 48 hours or submission of a special report to the NRC within 30 days following the event. This requirement is being revised to allow 7 days to restore an inoperable channel to operable status or submit a special report to the NRC within the next 14 days. This proposed change is consistent with ISTS Action C.1 which requires restoring one channel to operable status within 7 days, ISTS Action F.1 which requires initiating action in accordance with Specification 5.6.7 immediately if the required action and associated completion

time of Condition C are not met as specified in Table 3.3.11-1; and ISTS Specification 5.6.7 as described above; and

- A new Action "f" is being added which states that separate action entry is allowed for each instrument. This proposed change is consistent with the ISTS actions note as described above.

The ISTS post accident monitoring instrumentation requirements and the revised St. Lucie TS requirements affected by these changes are equivalent.

Justification: The operability of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, Instrumentation for Light-Water-Cooled Nuclear Plants to Assess Plant Conditions During and Following an Accident, December 1975 and NUREG 0578, TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations.

St. Lucie Unit 1 and Unit 2 TS actions are being modified to allow separate action entry for each instrument. This action is provided for clarification, and is consistent with the application of the current TS. This action has the same intent as the NUREG-1432, Revision 3 action note, which states, "Separate Condition entry is allowed for each Function."

St. Lucie Unit 1 TS Action 4 and Unit 2 TS Action "c" allow 7 days to restore an inoperable channel to operable status or a special report must be submitted to the NRC within 30 days following the event. St. Lucie Unit 1 TS Action 1 allows 30 days to restore an inoperable channel to operable status or a plant shutdown is required within the next 12 hours. St. Lucie Unit 2 TS Action "a" allows 7 days to restore an inoperable channel to operable status or a plant shutdown is required within the next 12 hours. These actions are required when the number of operable channels are less than the specified total number of channels. The proposed change will allow 30 days to restore an inoperable channel to operable status or a special report must be submitted to the NRC within the next 14 days describing the cause of the inoperability, the actions taken, and the plan and schedule for restoration of the inoperable system to operable status. The 30 day action time is appropriate based on operating experience and takes into account the remaining operable channel (or in the case of a parameter that has only one required channel, other non-Regulatory Guide 1.97 instrument channels to monitor the parameter), the passive nature of the instruments (no critical automatic action is assumed to occur from these instruments), and the low probability of an event requiring the post accident monitoring instrumentation during this interval. Changing the submittal time for the report is consistent with NUREG-1432, Revision 3 Specification 5.6.7, Post Accident Monitoring Report, which requires a report to be submitted within 14 days if the required actions and associated completion time of the restoration actions are not met. A special report in lieu of a shutdown is appropriate because alternative

actions are identified before a loss of functional capability condition occurs, and given the likelihood of unit conditions that would require the information provided by this instrumentation.

The changes that are being made to Unit 1 TS Action 1 and Action 4 result in the actions being redundant. Therefore, Unit 1 Action 1 is being deleted and Unit 1 Table 3.3-11 is being revised to specify that Action 4 is applicable to the pressurizer water level, RCS subcooling margin monitor, incore thermocouples, and containment pressure instrumentation, replacing Action 1. Similarly, the changes that are being made to Unit 2 TS Action "a" and Action "c" result in the Actions being redundant. Therefore, Unit 2 Action a is being deleted and Unit 2 Table 3.3-10 is being revised to specify that Action "c" is applicable to all of the accident monitoring instruments.

St. Lucie Unit 1 TS Action 6 and Unit 2 TS Action "b" allow 48 hours to restore an inoperable channel to operable status or the plant must be in hot shutdown within the next 12 hours. These actions are required when the number of operable channels is less than the minimum channels operable requirements. Unit 1 TS Action 7 allows 72 hours to restore an inoperable auxiliary feedwater flow rate instrumentation channel to operable status or the plant must be in hot shutdown within the next 12 hours. This action is required when the number of operable channels is less than the minimum channels operable requirements. The proposed change will allow 7 days to restore an inoperable channel to operable status, or a plant shutdown to hot shutdown will be required within the next 12 hours. The additional time to restore an inoperable channel to operable status is appropriate based on the low probability of an event requiring an inoperable accident monitoring function during the restoration interval, providing a reasonable time for repair, and other means which may be available to obtain the required information. The changes that are being made to Unit 1 TS Action 6 and Action 7 result in the Actions being redundant. Therefore, Unit 1 Action 7 is being deleted and Unit 1 Table 3.3-11 is being revised to specify that Action 6 is applicable to the auxiliary feedwater flow rate instruments.

St. Lucie Unit 1 TS Action 5 and Unit 2 TS Action "d" allow 48 hours to restore an inoperable channel to operable status, or a special report is required to be submitted to the NRC within 30 days following the event. These actions are required when the number of operable channels is less than the minimum channels operable requirements. The proposed change will allow 7 days to restore an inoperable channel to operable status, or a special report must be submitted to the NRC within the next 14 days. The additional time to restore an inoperable channel to operable status is appropriate based on the low probability of an event requiring an inoperable post accident monitoring instrument during the interval, providing a reasonable time for repair, and other means which may be available to obtain the required information. Changing the submittal time for the report is consistent with NUREG-1432, Revision 3 Specification 5.6.7, Post Accident Monitoring Report, which requires a report to be submitted within 14 days if the required actions and associated completion time of the restoration actions are not met. A special report in lieu of a shutdown is appropriate

because alternative actions are identified before a loss of functional capability condition occurs, and given the likelihood of unit conditions that would require the information provided by this instrumentation.

St. Lucie Units 1 and 2 TS Pages Affected:

Unit 1 3/4 3-41
Unit 1 3/4 3-42
Unit 1 3/4 3-43
Unit 2 3/4 3-41

St. Lucie Units 1 and 2 TS Bases Pages Affected:

Unit 1 Bases 3/4.3, Page 5
Unit 2 Bases 3/4.3, Page 5

Licensing Precedent: Vermont Yankee requested revision of the post accident monitoring action statements to be consistent with the ISTS on November 20, 2001. The request was approved by the NRC on May 10, 2002 as Amendment 207.

ATTACHMENT 2

NO SIGNIFICANT HAZARDS CONSIDERATIONS

AND

ENVIRONMENTAL CONSIDERATIONS

Introduction

The proposed amendments revise the St. Lucie Unit 1 and Unit 2 Technical Specifications (TS) to adopt seven generic changes that have been made to NUREG-1432, *Standard Technical Specifications for Combustion Engineering Plants*, (ISTS) and that have been previously reviewed and approved by the NRC. The proposed amendments also adopt the ISTS requirements for remote shutdown instrumentation and the ISTS actions for post accident monitoring instrumentation.

A summary listing of the proposed changes to the Technical Specifications follows.

- Unit 2 Section 2.1.1, Reactor Core, and 2.1.2, Reactor Coolant System Pressure References to Specification 6.7.1 are being deleted.

- Unit 1 Section 3/4.3.3.5, Remote Shutdown Instrumentation and Unit 2 Section 3/4.3.3.5, Remote Shutdown System Instrumentation. The requirements are being revised to be consistent with the ISTS requirements and the table of remote shutdown instruments are being relocated to the TS Bases.

- Unit 1 Section 3/4.3.3.8 and Unit 2 Section 3/4.3.3.6, Accident Monitoring Instrumentation - The actions are being revised to be consistent with the ISTS actions.

- Units 1 and 2 Section 3/4.7.1.2, Auxiliary Feedwater System - The surveillance requirement and surveillance interval for the auxiliary feedwater pumps are being changed.

- Units 1 and 2 Section 3/4.9.8.2, Shutdown Cooling and Coolant Circulation, Low Water Level - A footnote is being added to the Limiting Condition for Operation that would allow one required shutdown cooling (SDC) loop to be inoperable for up to 2 hours for surveillance testing, provided that the other SDC loop is operable and in operation.

- Unit 1 and Unit 2 Sections 6.1, Responsibility, 6.2, Organization, 6.3, Unit Staff Qualifications, 6.4, Training, 6.6, Reportable Event Action, 6.13, Process Control Program (PCP), and 6.14, Offsite Dose Calculation Manual (ODCM) - Specific personnel titles are being replaced with generic titles.

- Unit 1 and 2 Sections 6.2.2, Unit Staff - Several requirements for licensed operators are being deleted.

- Unit 1 and 2 Sections 6.2.3, Shift Technical Advisor - This section is being revised to be consistent with ISTS Specification 5.2.2.f.

- Unit 1 and 2 Sections 6.3.1 - This section is being added to indicate that a senior reactor operator and a licensed reactor operator perform the functions described in 10 CFR 50.54(m).

- Unit 1 and 2 Sections 6.7, Safety Limit Violation - This section is being deleted.

- 6.8.4.a, Primary Coolant Sources Outside Containment - The surveillance interval is being revised to be consistent with the other Technical Specification surveillance intervals. The applicability of Specification 4.0.2 is being extended to this specification.

- 6.8.4.f, Radioactive Effluent Controls Program - This section is being revised to be consistent with ISTS Specification 5.5.4.

- 6.9.1.6, Monthly Operating Reports - The requirement to include documentation of all challenges to the power operated relief valves or safety valves is being deleted.

Determination of No Significant Hazards Consideration

The standards used to arrive at a determination that a request for amendment involves a no significant hazards consideration are included in the Commission's regulation, 10 CFR 50.92, which states that no significant hazards considerations are involved if the operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) involve a significant reduction in a margin of safety. Each standard is discussed as follows:

(1) Operation of the facility in accordance with the proposed amendments would not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes revise administrative requirements, actions, action times, surveillance requirements, and surveillance frequencies. The revised requirements are not an initiator of any accident previously evaluated. As a result, the probability of any accident previously evaluated is not significantly increased by the proposed changes. The Technical Specifications continue to require the systems, structures, and components associated with the revised requirements to be operable. Therefore, any mitigation functions assumed in the accident analyses will continue to be performed. As a result, the consequences of any accident previously evaluated are not significantly increased. Therefore, the proposed amendments do not involve a significant increase in the probability or consequences of any accident previously evaluated.

(2) Operation of the facility in accordance with the proposed amendments would not create the possibility of a new or different kind of accident from any previously evaluated.

The proposed changes do not alter the design or physical configuration of the plant. No changes are being made to the plant that would introduce any new accident causal mechanisms. Therefore, operation of the facility in accordance with the proposed amendments do not create the possibility of a new or different kind of accident from any previously evaluated.

(3) Operation of the facility in accordance with the proposed amendments would not involve a significant reduction in a margin of safety.

The proposed changes do not change the design or function of plant equipment. The proposed changes do not significantly reduce the level of assurance that any associated plant equipment will be available to perform its function. The proposed changes provide operating flexibility without significantly affecting plant operation. Therefore, operation of the facility in accordance with the proposed amendments would not involve a significant reduction in the margin of safety.

Based on the above, the proposed amendments do not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any previously evaluated, or (3) involve a significant reduction in a margin of safety; and therefore does not involve a significant hazards consideration.

Environmental Considerations

The proposed license amendments change requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The proposed amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released off-site, and no significant increase in individual or cumulative occupational radiation exposure. FPL has concluded that the proposed amendments involve no significant hazards consideration, and therefore, meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Hence, pursuant to 10 CFR 51.22(b), an environmental impact statement or environmental assessment need not be prepared in connection with issuance of the amendments.

ATTACHMENT 3

PROPOSED MARK-UP OF

UNIT 1

AFFECTED TECHNICAL SPECIFICATIONS

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INSTRUMENTATION

REMOTE SHUTDOWN INSTRUMENTATION System

LIMITING CONDITION FOR OPERATION

3.3.3.5 The remote shutdown monitoring instrumentation channels shown in Table 3.3-9 shall be OPERABLE with readouts displayed external to the control room. System functions

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

a. With the number of OPERABLE (one or more) remote shutdown monitoring channels (System functions inoperable) less than required by Table 3.3-9, either:

1. ~~a.~~ Restore the inoperable channel (function) to OPERABLE status within 30 days, or

2. ~~b.~~ Be in HOT SHUTDOWN within the next 12 hours.

b. The provisions of Specification 3.0.4 are not applicable.

c. Separate action entry is allowed for each Function.

SURVEILLANCE REQUIREMENTS

4.3.3.5 Each remote shutdown monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-6.

Insert

INSERT to Unit 1 Page 3/4-33

4.3.3.5.1 Each remote shutdown instrumentation channel shall be demonstrated OPERABLE by performance of a CHANNEL CHECK for each channel that is normally energized at least once per 31 days.

4.3.3.5.2 Each remote shutdown instrumentation channel shall be demonstrated OPERABLE by performance of a CHANNEL CALIBRATION at least once per 18 months.

4.3.3.5.3 The OPERABILITY of the reactor trip breaker open/closed indication shall be demonstrated by performance of a CHANNEL FUNCTIONAL TEST at least once per 18 months.

<Relocate to Bases>

TABLE 3.3-9 (B)

REMOTE SHUTDOWN ~~MONITORING~~ INSTRUMENTATION

SYSTEM

Function ~~INSTRUMENT~~	~~READOUT LOCATION~~	~~MEASUREMENT RANGE~~	Required Number of Divisions ~~MINIMUM CHANNELS OPERABLE~~
1. Reactor Trip Breaker Indication	SWGR	OPEN-CLOSE	1/trip breaker
2. Pressurizer Pressure	Hot Shutdown Panel	1500-2500 psia	1
3. Pressurizer Level	Hot Shutdown Panel	0-100%	1
4. Main Steam Pressure	Hot Shutdown Panel	0-1200 psig	1/steam generator
5. Steam Generator Level	Hot Shutdown Panel	0-100%	1/steam generator
6. Cold Leg Temperature	Hot Shutdown Panel	0-600°F	1

<Table Deleted>

TABLE 4.3-6

REMOTE SHUTDOWN MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION
1. Reactor Trip Breaker Indication	M	N.A.
2. Pressurizer Pressure	M	R
3. Pressurizer Level	M	R
4. Steam Generator Level	M	R
5. Main Steam Pressure	M	R
6. Cold Leg Temperature	M	R

INSTRUMENTATION

ACCIDENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.8 The accident monitoring instrumentation channels shown in Table 3.3-11 shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

a. Actions per Table 3.3-11.

b. The provisions of Specification 3.0.4 are not applicable.

c. Separate action entry is allowed for each instrument.

SURVEILLANCE REQUIREMENTS

4.3.3.8 Each accident monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-7.

TABLE 3.3-11

ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	TOTAL NO. OF CHANNELS	MINIMUM CHANNELS OPERABLE	ACTION
1. Pressurizer Water Level	2	1	4 → 1, 6
2. Auxiliary Feedwater Flow Rate	1/pump	1/pump	6 → 7
3. RCS Subcooling Margin Monitor	2	1	4 → 1, 6
4. PORV Position Indicator Acoustic Flow Monitor	1/valve	1/valve	2
5. PORV Block Valve Position Indicator	1/valve	1/valve	2
6. Safety Valve Position Indicator	1/valve	1/valve	3
7. Incore thermocouples	4/core quadrant	2/core quadrant	4 → 1, 6
8. Containment Sump Water Level (Narrow Range)	1*	1*	4, 5
9. Containment Sump Water Level (Wide Range)	2	1	4, 5
10. Reactor Vessel Level Monitoring System	2**	1**	4, 5
11. Containment Pressure	2	1	4 → 1, 6

* The non-safety grade containment sump water level instrument may be substituted.

** Definition of OPERABLE: A channel is composed of eight (8) sensors in a probe, of which four (4) sensors must be OPERABLE.

TABLE 3.3-11 (continued)

ACTION STATEMENTS

Not used

ACTION 1 - With the number of OPERABLE channels less than the Total No. of Channels shown in Table 3.3-11, either restore the inoperable channel(s) to OPERABLE status within 30 days or be in HOT STANDBY within the next 12 hours.

ACTION 2 - With position indication inoperable, restore the inoperable indicator to OPERABLE status or close the associated PORV block valve and remove power from its operator within 48 hours or be in HOT STANDBY within the next 6 hours.

ACTION 3 - With any individual valve position indicator inoperable, obtain quench tank temperature, level and pressure information once per shift to determine valve position.

ACTION 4 - With the number of OPERABLE Channels one less than the Total Number of Channels shown in Table 3.3-11, either restore the inoperable channel to OPERABLE status within 7 days (30) if repairs are feasible without shutting down or prepare and submit a Special Report to the Commission pursuant to the specification 6.9.2 within 30 days (the next 14) following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

ACTION 5 - With the number of OPERABLE Channels less than the Minimum Channels OPERABLE requirements of Table 3.3-11, either restore the inoperable channel(s) (one channel) to OPERABLE status within 48 hours (7 days) if repairs are feasible without shutting down or:

1. Initiate an alternate method of monitoring the reactor vessel inventory; and

2. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days (the next 14) following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status; and

3. Restore the Channel to OPERABLE status at the next scheduled refueling.

ACTION 6 - With the number of OPERABLE accident monitoring channels less than the Minimum Channels OPERABLE requirements of Table 3.3-11, either restore the inoperable channel(s) (one channel) to OPERABLE status within 48 hours (7 days) or be at least in HOT SHUTDOWN within the next 12 hours.

ACTION 7 - With the number of OPERABLE accident monitoring channels less than the Minimum Channels OPERABLE requirements of Table 3.3-11, either restore the inoperable channel(s) to OPERABLE status within 72 hours or be at least in HOT SHUTDOWN within the next 12 hours.

Not used

PLANT SYSTEMS

AUXILIARY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 At least three independent steam generator auxiliary feedwater pumps and associated flow paths shall be OPERABLE with:

a. Two motor driven feedwater pumps, and

b. One feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

With one auxiliary feedwater pump inoperable, restore at least three auxiliary feedwater pumps (two motor driven pumps and one capable of being powered by an OPERABLE steam supply system) to OPERABLE status within 72 hours or be in HOT SHUTDOWN within the next 12 hours.

SURVEILLANCE REQUIREMENTS

4.7.1.2 Each auxiliary feedwater pump shall be demonstrated OPERABLE:

a. At least once per 31 days by:

1. Verifying that each motor driven pump develops a discharge pressure of ≥ 1342 psig on recirculation flow.

2. Verifying that the steam turbine driven pump develops a discharge pressure of ≥ 1342 psig on recirculation flow.*

* When not in MODES 1, 2 or 3, this surveillance shall be performed within 24 hours after entering MODE 3 and prior to entering MODE 2.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

1.~~8~~ Verifying that each valve (manual, power operated or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.

b. At least once per 18 months during shutdown by:

1. Verifying that each automatic valve in the flowpath actuates to its correct position upon receipt of the Auto Start actuation test signal.

2. Verifying that each auxiliary feedwater pump starts automatically as designed upon receipt of the Auto Start actuation test signal.

Insert

INSERT to Unit 1 Page TS 3/4 7-5

c. By verifying the developed head of each AFW pump at the flow test point is greater than or equal to the required developed head when tested in accordance with the Inservice Testing Program. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3 when testing the steam turbine-driven AFW pump and this Surveillance must be performed within 24 hours after entering MODE 3 and prior to entering MODE 2.

REFUELING OPERATIONS

LOW WATER LEVEL

LIMITING CONDITION FOR OPERATION

3.9.8.2 Two independent shutdown cooling loops shall be OPERABLE and at least one shutdown cooling loop shall be in operation. (*)

APPLICABILITY: MODE 6 when the water level above the top of irradiated fuel assemblies seated within the reactor pressure vessel is less than 23 feet.

ACTION:

a. With less than the required shutdown cooling loops OPERABLE, within one (1) hour 1) initiate corrective action to return the required loops to OPERABLE status, or 2) establish greater than or equal to 23 feet of water above irradiated fuel assemblies seated within the reactor pressure vessel.

b. With no shutdown cooling loop in operation, suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of Technical Specification 3.9.1. and within one (1) hour initiate corrective action to return the required shutdown cooling loop to operation. Close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere within 4 hours.

c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.8.2 At least one shutdown cooling loop shall be verified to be in operation and circulating reactor coolant at a flow rate of greater than or equal to 3000 gpm at least once per 12 hours.

Insert

INSERT to Unit 1 Page TS 3/4 9-8a

* One required shutdown cooling loop may be inoperable for up to 2 hours for surveillance testing, provided that the other shutdown cooling loop is OPERABLE and in operation.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

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

corporate officer with direct responsibility for the plant

6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATION

6.2.1 An onsite and an offsite organization shall be established for unit operation and corporate management. This onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

Insert

a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the Topical Quality Assurance Report and updated in accordance with 10 CFR 50.54(a)(3).

A specified corporate officer

b. The Chief Nuclear Officer shall be responsible for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.

c. The Plant General Manager shall be responsible for overall safe operation and shall have control over those onsite resources necessary for safe operation and maintenance of the plant.

d. Although the individuals who train the operating staff and those who carry out the quality assurance functions may report to the appropriate manager onsite, they shall have sufficient organizational freedom to be independent from operating pressures.

Radiation protection manager

e. Although health physics individuals may report to any appropriate manager onsite, for matters relating to radiological health and safety of employees and the public, the Health Physics Supervisor shall have direct access to that onsite individual having responsibility for overall unit management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.

INSERT to Unit 1 Page TS 6-1

The plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications shall be documented in the UFSAR or the Topical Quality Assurance Report.

6.0 ADMINISTRATIVE CONTROLS

6.2 ORGANIZATION (continued)

UNIT STAFF

6.2.2 The unit organization shall be subject to the following:

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

b. ~~At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the reactor is in MODE 1, 2, 3, or 4, at least one licensed Senior Reactor Operator shall be in the control room.~~ Deleted

c. A health physics technician# shall be on site when fuel is in the reactor.

d. Either a licensed SRO or licensed SRO limited to fuel handling who has no concurrent responsibilities during this operation shall be present during fuel handling and shall directly supervise all CORE ALTERATIONS.

e. Deleted.

The health physics technician may be less than the minimum requirement for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

6.0 ADMINISTRATIVE CONTROLS

f. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., licensed senior reactor operators (SROs), licensed reactor operators (ROs), health physicists, auxiliary operators, and key maintenance personnel). The administrative procedures shall include guidelines on working hours that ensure that adequate shift coverage shall be maintained without routine heavy use of overtime.

Any deviation from the above guidelines shall be authorized by the Plant General Manager or the Plant General Manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned. Routine deviation from the working hour guidelines shall not be authorized.

g. The Operations Supervisor shall hold a Senior Reactor Operator license.

SHIFT TECHNICAL ADVISOR FUNCTION

6.2.3 The Shift Technical Advisor function is to provide on shift advisory technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit.

Insert

INSERT to Unit 1 Page TS 6-5

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

6.0 ADMINISTRATIVE CONTROLS

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI / ANS-3.1-1978 for comparable positions, except for:

(1) the ~~Health Physics Supervisor~~ radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975,

(2) the Shift Technical Advisor who shall have specific training in plant design and plant operating characteristics, including transients and accidents, and any of the following educational requirements:

- Bachelor's degree in engineering from an accredited institution; or
- Professional Engineer's (PE) license obtained by successful completion of the PE examination; or
- Bachelor's degree in engineering technology from an accredited institution, including course work in the physical, mathematical, or engineering sciences, or
- Bachelor's degree in physical science from an accredited institution, including course work in the physical, mathematical, or engineering sciences.

(3) the Multi-Discipline Supervisors who shall meet or exceed the following requirements:

a. *Education: Minimum of a high school diploma or equivalent.*

b. Experience: Minimum of four years of related technical experience, which shall include three years power plant experience of which one year is at a nuclear power plant.

Insert

c. Training: Complete the Multi-Discipline Supervisor training program.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI / ANS-3.1 – 1978 and 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

6.5 DELETED

INSERT to Unit 1 Page TS 6-6

For the purpose of 10 CFR 55.4, a licensed senior reactor operator and a licensed reactor operator are those individuals who, in addition to meeting the requirements of 6.3.1, perform the functions described in 10 CFR 50.54(m).

corporate officer responsible for overall plant nuclear safety

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and

b. Each REPORTABLE EVENT shall be reviewed by the FRG, and the results of the review shall be submitted to the CNRB, and the ~~Chief Nuclear Officer~~.

6.7 ~~SAFETY LIMIT VIOLATION~~ DELETED

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Chief Nuclear Officer and the CNRB shall be notified within 24 hours.

b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the FRG. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.

6.0 ADMINISTRATIVE CONTROLS

c. The Safety Limit Violation Report shall be submitted to the Commission, the CNRB, and the Chief Nuclear Officer within 14 days of the violation.

d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

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

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, and those required for implementing the requirements of NUREG 0737.

b. Refueling operations.

c. Surveillance and test activities of safety-related equipment.

d. Not Used.

e. Not Used.

f. Fire Protection Program implementation.

g. PROCESS CONTROL PROGRAM implementation.

h. OFFSITE DOSE CALCULATION MANUAL implementation.

i. Quality Control Program for effluent monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974.

j. Quality Control Program for environmental monitoring using the guidance in Regulatory Guide 4.1, Revision 1, April 1975.

6.8.2 DELETED

6.0 ADMINISTRATIVE CONTROLS

6.8.3 DELETED

6.8.4 The following programs shall be established, implemented, maintained, and shall be audited under the cognizance of the CNRB:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the Shutdown Cooling System, High Pressure Safety Injection System, Containment Spray System, and RCS Sampling. The program shall include the following:

(i) Preventive maintenance and periodic visual inspection requirements, and

(ii) Integrated leak test requirements for each system at ~~refueling cycle intervals or less~~ least once per 18 months

b. In-Plant Radioiodine Monitoring

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

(i) Training of personnel,

(ii) Procedures for monitoring, and

(iii) Provisions for maintenance of sampling and analysis equipment.

The provisions of specification 4.0.2 are applicable.

3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM,

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

Insert1

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

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

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

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

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

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

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

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

Insert2

g. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of the environmental exposure pathways. The program shall (1) be contained in the ODCM,

INSERTS to Unit 1 Page TS 6-15a

Insert 1

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

Insert 2

The provisions of Specifications 4.0.2 and 4.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the 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 REPORTS

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

6.13 PROCESS CONTROL PROGRAM (PCP)

Changes to the PCP:

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2q. This documentation shall contain:

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

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

2. Shall become effective after review and acceptance by the Facility Review Group and the approval of the Plant General Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2q. This documentation shall contain:

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

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

2. Shall become effective after review and acceptance by the Facility Review Group and the approval of the Plant General Manager.

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

ATTACHMENT 4

PROPOSED MARK-UP OF

UNIT 2

AFFECTED TECHNICAL SPECIFICATIONS

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2.0 SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

2.1 SAFETY LIMITS

2.1.1 REACTOR CORE

DNBR

2.1.1.1 The combination of THERMAL POWER, pressurizer pressure, and maximum cold leg coolant temperature shall not exceed the limits shown on Figure 2.1-1.

APPLICABILITY: MODES 1 and 2.

ACTION:

Whenever the combination of THERMAL POWER, pressurizer pressure and maximum cold leg coolant temperature has exceeded the limits shown on Figure 2.1-1, be in HOT STANDBY within 1 hour and comply with the requirements of Specification 6.7.1

REACTOR COOLANT SYSTEM PRESSURE

2.1.2 The Reactor Coolant System pressure shall not exceed 2750 psia.

APPLICABILITY: MODES 1, 2, 3, 4 and 5.

ACTION:

MODES 1 and 2

Whenever the Reactor Coolant System pressure has exceeded 2750 psia, be in HOT STANDBY with the Reactor Coolant System pressure within its limit within 1 hour and comply with the requirements of Specification 6.7.1.

MODES 3, 4 and 5

Whenever the Reactor Coolant System pressure has exceeded 2750 psia, reduce the Reactor Coolant System pressure to within its limit within 5 minutes and comply with the requirements of Specification 6.7.1.

INSTRUMENTATION

REMOTE SHUTDOWN SYSTEM INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.5 The remote shutdown system transfer switches, control and instrumentation channels shown in Table 3.3-9 shall be OPERABLE. Functions

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

a. With one or more the number of OPERABLE remote shutdown channels less than the Required Number of Channels shown in Table 3.3-9, either restore the inoperable channel (function) to OPERABLE status within 30 days (1.) or be in HOT SHUTDOWN within the next 12 hours. (2.)

System functions inoperable

b. With the number of OPERABLE remote shutdown channels less than the Minimum Channels OPERABLE requirements of Table 3.3-9, either restore the inoperable channel to OPERABLE status within 7 days, or be in HOT SHUTDOWN within the next 12 hours.

b. The provisions of Specification 3.0.4 are not applicable.

c. Seperate action entry is allowed for each Function.

SURVEILLANCE REQUIREMENTS

4.3.3.5.1 Each remote shutdown monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-6.

4.3.3.5.2 Each remote shutdown system instrumentation transfer switch and control circuit shall be demonstrated OPERABLE by verifying its capability to perform its intended function(s) at least once per 18 months.

Insert

INSERT to Unit 2 Page 3/4-38

4.3.3.5.1 Each remote shutdown instrumentation channel shall be demonstrated OPERABLE by performance of a CHANNEL CHECK for each channel that is normally energized at least once per 31 days.

4.3.3.5.2 Each remote shutdown instrumentation channel shall be demonstrated OPERABLE by performance of a CHANNEL CALIBRATION at least once per 18 months. Neutron detectors are excluded from the CHANNEL CALIBRATION.

4.3.3.5.3 The OPERABILITY of the reactor trip breaker open/closed indication shall be demonstrated by performance of a CHANNEL FUNCTIONAL TEST at least once per 18 months.

4.3.3.5.4 Each remote shutdown system instrumentation transfer switch and control circuit shall be demonstrated OPERABLE by verifying its capability to perform its intended function(s) at least once per 18 months.

<Relocate to Bases>

TABLE 3.3-9 (B)

REMOTE SHUTDOWN SYSTEM INSTRUMENTATION

Function / INSTRUMENT	READOUT LOCATION	CHANNELS RANGE	REQUIRED NUMBER OF CHANNELS	Required Number of Divisions / MINIMUM CHANNELS OPERABLE
1. Power Range Neutron Flux	Hot Shutdown Panel	2×10^{-8}% - 200%	2	1
2. Reactor Trip Breaker Indication	Reactor Trip Switch Gear (RB)	OPEN-CLOSE	1/trip breaker	1/trip breaker
3. Reactor Coolant Temperature – T_{Cold}	Hot Shutdown Panel	0°F - 600°F	2	1
4. Pressurizer Pressure	Hot Shutdown Panel	0 - 3000 psia	2	1
5. Pressurizer Level	Hot Shutdown Panel	0 - 100% level	2	1
6. Steam Generator Pressure	Hot Shutdown Panel	0 - 1200 psia	1/steam generator	1/steam generator
7. Steam Generator Level	Hot Shutdown Panel	0 - 100% level	2/steam generator	1/steam generator
8. Shutdown Cooling Flow Rate	Hot Shutdown Panel	0 - 5000 gpm	2	1
9. Shutdown Cooling Temperature	Hot Shutdown Panel	0°F - 350°F	2	1
10. Diesel Generator Voltage	Hot Shutdown Panel	0 - 5250 V	1/diesel generator	1/diesel generator
11. Diesel Generator Power	Hot Shutdown Panel	0 - 5000 kW	1/diesel generator	1/diesel generator
12. Atmospheric Dump Valve Pressure	Hot Shutdown Panel	0 - 1200 psig	1/steam generator	1/steam generator
13. Charging Flow/Pressure	Hot Shutdown Panel	0 - 150 gpm/ 0 - 3000 psia	2	1
CONTROLS/ISOLATE SWITCHES				
14 → 0. Atmospheric Stm Dump Controllers	Hot Shutdown Panel/ RAB431	N.A.	2/steam generator	1/steam generator
15 → 0. Aux. Spray Valves	Hot Shutdown Panel/ RAB431	N.A	2	1
16 → 0. Charging Pump Controls	Hot Shutdown Panel/ RAB431	N.A	3	2
17 → 0. Letdown Isol Valve	Hot Shutdown Panel/ RAB431	N.A	3	2
18 → 0. AFW Pump/Valve Controls	Hot Shutdown Panel/ RAB431	N.A	3	2
19 → 0. AFW Pump Steam Inlet Valve	Hot Shutdown Panel/ RAB431	N.A	2	1
20 → 0. Pzr Heater Controls	Hot Shutdown Panel/ RAB431	N.A	6	3

<Table Deleted>

TABLE 4.3-6

REMOTE SHUTDOWN SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

	INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION
1.	Power Range Neutron Flux	M	Q
2.	Reactor Trip Breaker Indication	M	N.A.
3.	Reactor Coolant Temperature – T_{Cold}	M	R
4.	Pressurizer Pressure	M	R
5.	Pressurizer Level	M	R
6.	Steam Generator Level	M	R
7.	Steam Generator Pressure	M	R
8.	Shutdown Cooling Flow Rate	M	R
9.	Shutdown Cooling Temperature	M	R
10.	Diesel Geneator Voltage	M	R
11.	Diesel Generator Power	M	R
12.	Atmospheric Dump Valve Pressure	M	R
13.	Charging Flow/Pressure	M	R

INSTRUMENTATION

ACCIDENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.6 The accident monitoring instrumentation channels shown in Table 3.3-10 shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

Not used.

a.* With the number of OPERABLE accident monitoring channels less than the Required Number of Channels shown in Table 3.3-10, either restore the inoperable channel to OPERABLE status within 7 days, or be in HOT SHUTDOWN within the next 12 hours.

b.* With the number of OPERABLE accident monitoring channels less than the Minimum Channels OPERABLE requirements of Table 3.3-10, either restore the inoperable channels to OPERABLE status within 48 hours or be in at least HOT SHUTDOWN within the next 12 hours.

One channel — 7 days

c.* With the number of OPERABLE Channels one less than the Total Number of Channels shown in Table 3.3-10, either restore the inoperable channel to OPERABLE status within 7 days if repairs are feasible without shutting down or prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

30 — Required — the next 14

d.** With the number of OPERABLE Channels less than the Minimum Channels OPERABLE requirements of Table 3.3-10, either restore the inoperable channel(s) to OPERABLE status within 48 hours if repairs are feasible without shutting down or:

One channel — 7 days

1. Initiate an alternate method of monitoring the reactor vessel inventory; and

2. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within 30 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status, and

the next 14

3. Restore the Channel to OPERABLE status at the next scheduled refueling.

e. The provisions of Specification 3.0.4 are not applicable.

f. Separate action entry is allowed for each Instrument.

* Action statements do not apply to Reactor Vessel Level Monitoring System, Containment Sump Water Level (narrow range) and Containment Sump Water Level (wide range) instruments.

** Action statements apply only to Reactor Vessel Level Monitoring System, Containment Sump Water Level (narrow range) and Containment Sump Water Level (wide range) instruments.

PLANT SYSTEMS

AUXILIARY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 At least three independent steam generator auxiliary feedwater pumps and associated flow paths shall be OPERABLE with:

a. Two feedwater pumps, each capable of being powered from separate OPERABLE emergency busses, and

b. One feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

a. With one auxiliary feedwater pump inoperable, restore the required auxiliary feedwater pumps to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

b. With two auxiliary feedwater pumps inoperable be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.

c. With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.7.1.2 Each auxiliary feedwater pump shall be demonstrated OPERABLE:

a. At least once per 31 days by:

1. Verifying that each motor-driven pump develops a discharge pressure of greater than or equal to 1270 psig on recirculation flow.

2. Verifying that the turbine-driven pump develops a discharge pressure of greater than or equal to 1260 psig on recirculation flow when the secondary steam supply pressure is greater than 50 psig. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3.

1. 3. Verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (continued)

b. At least once per 18 months during shutdown by:

1. Verifying that each automatic valve in the flowpath path actuates to its correct position upon receipt of an auxiliary feedwater actuation test signal.

2. Verifying that each pump starts automatically upon receipt of an auxiliary feedwater actuation test signal.

c. Following an extended cold shutdown (30 days or longer) and prior to entering MODE 2, a flow test shall be performed to verify that normal flow path from the condensate storage tank (CST) to the steam generators.

Insert

INSERT to Unit 2 Page TS 3/4 7-5

d. By verifying the developed head of each AFW pump at the flow test point is greater than or equal to the required developed head when tested in accordance with the Inservice Testing Program. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3 when testing the steam turbine-driven AFW pump and this Surveillance must be performed within 24 hours after entering MODE 3 and prior to entering MODE 2.

REFUELING OPERATIONS

LOW WATER LEVEL

LIMITING CONDITION FOR OPERATION

3.9.8.2 The independent shutdown cooling loops shall be OPERABLE and at least one shutdown cooling shall be in operation.**

APPLICABILITY: MODE 6 when the water level above the top of the reactor pressure vessel flange is less than 23 feet.

ACTION:

a. With less than the required shutdown cooling loops OPERABLE, within 1 hour initiate corrective action to return the required loops to OPERABLE status, or to establish greater than or equal to 23 feet of water above the reactor pressure vessel flange, as soon as possible.

b. With no shutdown cooling loop in operation, suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of Technical Specification 3.9.1 and within 1 hour initiate corrective action to return the required shutdown cooling loop to operation. Close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere within 4 hours.

SURVEILLANCE REQUIREMENTS

4.9.8.2 At least once per 12 hours:

a. At least one shutdown cooling loop shall be verified to be in operation.

b. The total flow rate of reactor coolant to the reactor pressure vessel shall be verified to be greater than or equal to 3000 gpm.*

---

* The reactor coolant flow rate requirement may be reduced to 1850 gpm if the following conditions are satisfied before the reduced requirement is implemented: the reactor has been determined to have been subcritical for at least 125 hours, the maximum RCS temperature is ≤ 117°F, and the temperature of CCW to the shutdown cooling heat exchanger is ≤ 87°F.

Insert

INSERT to Unit 2 Page TS 3/4 9-9

** One required shutdown cooling loop may be inoperable for up to 2 hours for surveillance testing, provided that the other shutdown cooling loop is OPERABLE and in operation.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

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

corporate officer with direct responsibility for the plant

6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATION

6.2.1 An onsite and an offsite organization shall be established for unit operation and corporate management. This onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

Insert

a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the Topical Quality Assurance Report and updated in accordance with 10 CFR 50.54(a)(3).

A specified corporate officer

b. The Chief Nuclear Officer shall be responsible for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.

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

d. Although the individuals who train the operating staff and those who carry out the quality assurance functions may report to the appropriate manager onsite, they shall have sufficient organizational freedom to be independent from operating pressures.

radiation protection manager

e. Although health physics individuals may report to any appropriate manager onsite, for matters relating to radiological health and safety of employees and the public, the Health Physics Supervisor shall have direct access to that onsite individual having responsibility for overall unit management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.

INSERT to Unit 2 Page TS 6-1

The plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications shall be documented in the UFSAR or the Topical Quality Assurance Report.

6.0 ADMINISTRATIVE CONTROLS

6.2 ORGANIZATION (Continued)

UNIT STAFF

6.2.2 The unit organization shall be subject to the following:

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

b. ~~At least one licensed Reactor Operator shall be in the control room when fuel is in the reactor. In addition, while the reactor is in MODE 1, 2, 3, or 4, at least one licensed Senior Reactor Operator shall be in the control room.~~ DELETED

c. A health physics technician# shall be on site when fuel is in the reactor.

d. Either a licensed SRO or licensed SRO limited to fuel handling who has no concurrent responsibilities during this operation shall be present during fuel handling and shall directly supervise all CORE ALTERATIONS.

e. DELETED

f. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., licensed senior reactor operators (SROs), licensed reactor operators (ROs), health physicists, auxiliary operators, and key maintenance personnel). The administrative procedures shall include guidelines on working hours that ensure that adequate shift coverage shall be maintained without routine heavy use of overtime.

Any deviation from the above guidelines shall be authorized by the Plant General Manager or the Plant General Manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned. Routine deviation from the working hour guidelines shall not be authorized.

g. The Operations Supervisor shall hold a Senior Reactor Operator License.

The health physics technician may be less than the minimum requirement for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

6.0 ADMINISTRATIVE CONTROLS

Insert 1

6.2.3 SHIFT TECHNICAL ADVISOR

FUNCTION

The Shift Technical Advisor function is to provide on shift advisory technical support in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit.

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI / ANS-3.1-1978 for comparable positions, except for:

radiation protection manager

(1) the Health Physics Supervisor who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975,

(2) the Shift Technical Advisor who shall have specific training in plant design and plant operating characteristics, including transients and accidents, and any of the following educational requirements:

- Bachelor's degree in engineering from an accredited institution; or
- Professional Engineer's (PE) license obtained by successful completion of the PE examination; or
- Bachelor's degree in engineering technology from an accredited institution, including course work in the physical, mathematical, or engineering sciences, or
- Bachelor's degree in physical science from an accredited institution, including course work in the physical, mathematical, or engineering sciences.

(3) the Multi-Discipline Supervisors who shall meet or exceed the following requirements:

a. Education: Minimum of a high school diploma or equivalent.

b. Experience: Minimum of four years of related technical experience, which shall include three years power plant experience of which one year is at a nuclear power plant.

c. Training: Complete the Multi-Discipline Supervisor training program.

Insert 2

INSERTS to Unit 2 Page TS 6-6

Insert 1

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

Insert 2

For the purpose of 10 CFR 55.4, a licensed senior reactor operator and a licensed reactor operator are those individuals who, in addition to meeting the requirements of 6.3.1, perform the functions described in 10 CFR 50.54(m).

6.0 ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI / ANS-3.1-1978 and 10 CFR Part 55 and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

6.5 DELETED

6.6 REPORTABLE EVENTS ACTION

corporate officer responsible for overall plant nuclear safety

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and

b. Each REPORTABLE EVENT shall be reviewed by the FRG, and the results of this review shall be submitted to the CNRB, and the Chief Nuclear Officer.

6.7 SAFETY LIMIT VIOLATION

6.7 DELETED

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

a. The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The Chief Nuclear Officer and the CNRB shall be notified within 24 hours.

b. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the FRG. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.

c. The Safety Limit Violation Report shall be submitted to the Commission, the CNRB, and the Chief Nuclear Officer within 14 days of the violation.

d. Critical operation of the unit shall not be resumed until authorized by the Commission.

6.8 PROCEDURES AND PROGRAMS

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

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, and those required for implementing the requirements of NUREG 0737.

b. Refueling operations.

c. Surveillance and test activities of safety-related equipment.

d. Not Used.

e. Not Used.

6.0 ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

6.8.4 The following programs shall be established, implemented, maintained, and shall be audited under the cognizance of the CNRB:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the Shutdown Cooling System, High Pressure Safety Injection System, Containment Spray System, and RCS Sampling. The program shall include the following:

(i) Preventive maintenance and periodic visual inspection requirements, and

(ii) Integrated leak test requirements for each system at ~~refueling cycle intervals~~ least once per 18 months ~~or less~~.

b. In-Plant Radioiodine Monitoring

A program which will ensure the capability to accurately determine the airborne Iodine concentration in vital areas under accident conditions. This program shall include the following:

(i) Training of personnel,

(ii) Procedures for monitoring, and

(iii) Provisions for maintenance of sampling and analysis equipment.

The provisions of Specification 4.0.2 are applicable.

f. Radioactive Effluent Controls Program

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

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

2) Limitations on the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to ten times the concentration values in 10 CFR 20.1001 – 20.2401, Appendix B, Table 2, Column 2.

3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM,

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

Insert

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

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

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

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

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

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

9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater

INSERT to Unit 2 Page TS 6-15a

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

than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,

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

Insert

g. Radiological Environmental Monitoring Program

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

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

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

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

h. Containment Leakage Rate Testing Program

A program to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50 Appendix J, Option B, as modified by approved exemptions. This program is in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," as modified by the following exception(s):

a) Bechtel Topical Report, BN-TOP-1 or ANS 56.8-1994 (as recommended by R.G. 1.163) will be used for type A testing.

b) The first Type A test performed after the June 1992 Type A test shall be no later than June 2007.

The peak calculated containment internal pressure for the design basis loss of coolant accident P_a, is 41.8 psig. The containment design pressure is 44 psig.

The maximum allow containment leakage rate, L_a, at P_a, shall be 0.50% of containment air weight per day.

INSERT to Unit 2 Page TS 6-15b

The provisions of Specifications 4.0.2 and 4.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

ANNUAL REPORTS (Continued)

greater than 100 mrems/yr and their associated man-rem exposure according to work and job functions,[2] e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignments to various duty functions may be estimated 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 Deep Dose Equivalent received from external sources should be assigned to specific major work functions.

b. 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 the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the 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 REPORTS

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

[2] This tabulation supplements the requirements of 20.2206 of 10 CFR Part 20.

6.13 PROCESS CONTROL PROGRAM (PCP)

Changes to the PCP:

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2q. This documentation shall contain:

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

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

2. Shall become effective after review and acceptance by the Facility Review Group and the approval of the Plant General Manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2q. This documentation shall contain:

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

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

2. Shall become effective after review and acceptance by the Facility Review Group and the approval of the Plant General Manager.

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

ATTACHMENT 5

RETYPED UNIT 1 TECHNICAL SPECIFICATION PAGES
(For information only)

The attached retype reflects the currently issued version of the Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

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INSTRUMENTATION

REMOTE SHUTDOWN SYSTEM

LIMITING CONDITION FOR OPERATION

3.3.3.5 The remote shutdown system functions shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

a. With one or more remote shutdown system functions inoperable, either:

   1. Restore the inoperable function to OPERABLE status within 30 days, or

   2. Be in HOT SHUTDOWN within the next 12 hours.

b. The provisions of Specification 3.0.4 are not applicable.

c. Separate action entry is allowed for each function.

SURVEILLANCE REQUIREMENTS

4.3.3.5.1 Each remote shutdown instrumentation channel shall be demonstrated OPERABLE by performance of a CHANNEL CHECK for each channel that is normally energized at least once per 31 days.

4.3.3.5.2 Each remote shutdown instrumentation channel shall be demonstrated OPERABLE by performance of a CHANNEL CALIBRATION at least once per 18 months.

4.3.3.5.3 The OPERABILITY of the reactor trip breaker open/closed indication shall be demonstrated by performance of a CHANNEL FUNCTIONAL TEST at least once per 18 months.

TABLE DELETED

TABLE DELETED

INSTRUMENTATION

ACCIDENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.8 The accident monitoring instrumentation channels shown in Table 3.3-11 shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

a. Actions per Table 3.3-11.

b. The provisions of Specification 3.0.4 are not applicable.

c. Separate action entry is allowed for each instrument.

SURVEILLANCE REQUIREMENTS

4.3.3.8 Each accident monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-7.

TABLE 3.3-11

ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	TOTAL NO. OF CHANNELS	MINIMUM CHANNELS OPERABLE	ACTION
1. Pressurizer Water Level	2	1	4, 6
2. Auxiliary Feedwater Flow Rate	1/pump	1/pump	6
3. RCS Subcooling Margin Monitor	2	1	4, 6
4. PORV Position Indicator Acoustic Flow Monitor	1/valve	1/valve	2
5. PORV Block Valve Position Indicator	1/valve	1/valve	2
6. Safety Valve Position Indicator	1/valve	1/valve	3
7. Incore thermocouples	4/core quadrant	2/core quadrant	4, 6
8. Containment Sump Water Level (Narrow Range)	1*	1*	4, 5
9. Containment Sump Water Level (Wide Range)	2	1	4, 5
10. Reactor Vessel Level Monitoring System	2**	1**	4, 5
11. Containment Pressure	2	1	4, 6

* The non-safety grade containment sump water level instrument may be substituted.

** Definition of OPERABLE: A channel is composed of eight (8) sensors in a probe, of which four (4) sensors must be OPERABLE.

TABLE 3.3-11 (continued)

ACTION STATEMENTS

ACTION 1 - Not Used

ACTION 2 - With position indication inoperable, restore the inoperable indicator to OPERABLE status or close the associated PORV block valve and remove power from its operator within 48 hours or be in HOT STANDBY within the next 6 hours.

ACTION 3 - With any individual valve position indicator inoperable, obtain quench tank temperature, level and pressure information once per shift to determine valve position.

ACTION 4 - With the number of OPERABLE Channels one less than the Total Number of Channels shown in Table 3.3-11, either restore the inoperable channel to OPERABLE status within 30 days if repairs are feasible without shutting down or prepare and submit a Special Report to the Commission pursuant to the specification 6.9.2 within the next 14 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

ACTION 5 - With the number of OPERABLE Channels less than the Minimum Channels OPERABLE requirements of Table 3.3-11, either restore one channel to OPERABLE status within 7 days if repairs are feasible without shutting down or:

1. Initiate an alternate method of monitoring the reactor vessel inventory; and

2. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 14 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status; and

3. Restore the Channel to OPERABLE status at the next scheduled refueling.

ACTION 6 - With the number of OPERABLE accident monitoring channels less than the Minimum Channels OPERABLE requirements of Table 3.3-11, either restore one channel to OPERABLE status within 7 days or be at least in HOT SHUTDOWN within the next 12 hours.

ACTION 7 - Not Used

PLANT SYSTEMS

AUXILIARY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 At least three independent steam generator auxiliary feedwater pumps and associated flow paths shall be OPERABLE with:

a. Two motor driven feedwater pumps, and

b. One feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2 and 3.

ACTION:

With one auxiliary feedwater pump inoperable, restore at least three auxiliary feedwater pumps (two motor driven pumps and one capable of being powered by an OPERABLE steam supply system) to OPERABLE status within 72 hours or be in HOT SHUTDOWN within the next 12 hours.

SURVEILLANCE REQUIREMENTS

4.7.1.2 Each auxiliary feedwater pump shall be demonstrated OPERABLE:

a. At least once per 31 days by:

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

1. Verifying that each valve (manual, power operated or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.

b. At least once per 18 months during shutdown by:

1. Verifying that each automatic valve in the flowpath actuates to its correct position upon receipt of the Auto Start actuation test signal.

2. Verifying that each auxiliary feedwater pump starts automatically as designed upon receipt of the Auto Start actuation test signal.

c. By verifying the developed head of each AFW pump at the flow test point is greater than or equal to the required developed head when tested in accordance with the Inservice Testing Program. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3 when testing the steam turbine-driven AFW pump and this Surveillance must be performed within 24 hours after entering MODE 3 and prior to entering MODE 2.

REFUELING OPERATIONS

LOW WATER LEVEL

LIMITING CONDITION FOR OPERATION

3.9.8.2 Two independent shutdown cooling loops shall be OPERABLE and at least one shutdown cooling loop shall be in operation.*

APPLICABILITY: MODE 6 when the water level above the top of irradiated fuel assemblies seated within the reactor pressure vessel is less than 23 feet.

ACTION:

a. With less than the required shutdown cooling loops OPERABLE, within one (1) hour 1) initiate corrective action to return the required loops to OPERABLE status, or 2) establish greater than or equal to 23 feet of water above irradiated fuel assemblies seated within the reactor pressure vessel.

b. With no shutdown cooling loop in operation, suspend operations that would cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of Technical Specification 3.9.1. and within one (1) hour initiate corrective action to return the required shutdown cooling loop to operation. Close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere within 4 hours.

c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.9.8.2 At least one shutdown cooling loop shall be verified to be in operation and circulating reactor coolant at a flow rate of greater than or equal to 3000 gpm at least once per 12 hours.

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* One required shutdown cooling loop may be inoperable for up to 2 hours for surveillance testing, provided that the other shutdown cooling loop is OPERABLE and in operation.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

6.1.2 The Shift Supervisor, or during his absence from the control room a designated individual, shall be responsible for the control room command function. A management directive to this effect, signed by the corporate officer with direct responsibility for the plant, shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATION

6.2.1 An onsite and an offsite organization shall be established for unit operation and corporate management. This onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the Topical Quality Assurance Report and updated in accordance with 10 CFR 50.54(a)(3). The plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications shall be documented in the UFSAR or the Topical Quality Assurance Report.

b. A specified corporate officer shall be responsible for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.

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

d. Although the individuals who train the operating staff and those who carry out the quality assurance functions may report to the appropriate manager onsite, they shall have sufficient organizational freedom to be independent from operating pressures.

e. Although health physics individuals may report to any appropriate manager onsite, for matters relating to radiological health and safety of employees and the public, the radiation protection manager shall have direct access to that onsite individual having responsibility for overall unit management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.

6.0 ADMINISTRATIVE CONTROLS

6.2 ORGANIZATION (continued)

UNIT STAFF

6.2.2 The unit organization shall be subject to the following:

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

b. Deleted.

c. A health physics technician# shall be on site when fuel is in the reactor.

d. Either a licensed SRO or licensed SRO limited to fuel handling who has no concurrent responsibilities during this operation shall be present during fuel handling and shall directly supervise all CORE ALTERATIONS.

e. Deleted.

The health physics technician may be less than the minimum requirement for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

6.0 ADMINISTRATIVE CONTROLS

f. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., licensed senior reactor operators (SROs), licensed reactor operators (ROs), health physicists, auxiliary operators, and key maintenance personnel). The administrative procedures shall include guidelines on working hours that ensure that adequate shift coverage shall be maintained without routine heavy use of overtime.

   Any deviation from the above guidelines shall be authorized by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned. Routine deviation from the working hour guidelines shall not be authorized.

g. The operations supervisor shall hold a Senior Reactor Operator license.

SHIFT TECHNICAL ADVISOR FUNCTION

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

6.0 ADMINISTRATIVE CONTROLS

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI / ANS-3.1-1978 for comparable positions, except for:

(1) the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975,

(2) the Shift Technical Advisor who shall have specific training in plant design and plant operating characteristics, including transients and accidents, and any of the following educational requirements:

- Bachelor's degree in engineering from an accredited institution; or
- Professional Engineer's (PE) license obtained by successful completion of the PE examination; or
- Bachelor's degree in engineering technology from an accredited institution, including course work in the physical, mathematical, or engineering sciences, or
- Bachelor's degree in physical science from an accredited institution, including course work in the physical, mathematical, or engineering sciences.

(3) the Multi-Discipline Supervisors who shall meet or exceed the following requirements:

a. Education: Minimum of a high school diploma or equivalent.

b. Experience: Minimum of four years of related technical experience, which shall include three years power plant experience of which one year is at a nuclear power plant.

c. Training: Complete the Multi-Discipline Supervisor training program.

For the purpose of 10 CFR 55.4, a licensed senior reactor operator and a licensed reactor operator are those individuals who, in addition to meeting the requirements of 6.3.1, perform the functions described in 10 CFR 50.54(m).

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the training manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI / ANS-3.1 – 1978 and 10 CFR Part 55 and the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

6.5 DELETED

ADMINISTRATIVE CONTROLS

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and

b. Each REPORTABLE EVENT shall be reviewed by the FRG, and the results of the review shall be submitted to the CNRB, and the corporate officer responsible for overall plant nuclear safety.

6.7 DELETED

6.0 ADMINISTRATIVE CONTROLS

6.8 PROCEDURES AND PROGRAMS

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

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, and those required for implementing the requirements of NUREG 0737.

b. Refueling operations.

c. Surveillance and test activities of safety-related equipment.

d. Not Used.

e. Not Used.

f. Fire Protection Program implementation.

g. PROCESS CONTROL PROGRAM implementation.

h. OFFSITE DOSE CALCULATION MANUAL implementation.

i. Quality Control Program for effluent monitoring, using the guidance in Regulatory Guide 1.21, Revision 1, June 1974.

j. Quality Control Program for environmental monitoring using the guidance in Regulatory Guide 4.1, Revision 1, April 1975.

6.8.2 DELETED

6.0 ADMINISTRATIVE CONTROLS

6.8.3 DELETED

6.8.4 The following programs shall be established, implemented, maintained, and shall be audited under the cognizance of the CNRB:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the Shutdown Cooling System, High Pressure Safety Injection System, Containment Spray System, and RCS Sampling. The program shall include the following:

(i) Preventive maintenance and periodic visual inspection requirements, and

(ii) Integrated leak test requirements for each system at least once per 18 months.

The provisions of Specification 4.0.2 are applicable.

b. In-Plant Radioiodine Monitoring

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

(i) Training of personnel,

(ii) Procedures for monitoring, and

(iii) Provisions for maintenance of sampling and analysis equipment.

3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM,

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

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

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

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

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

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

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

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

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

The provisions of Specifications 4.0.2 and 4.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

g. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radio-nuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of the environmental exposure pathways. The program shall (1) be contained in the ODCM,

isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the 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 REPORTS

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

6.13 PROCESS CONTROL PROGRAM (PCP)

Changes to the PCP:

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2q. This documentation shall contain:

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

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

2. Shall become effective after review and acceptance by the Facility Review Group and the approval of the plant manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2q. This documentation shall contain:

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

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

2. Shall become effective after review and acceptance by the Facility Review Group and the approval of the plant manager.

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

ATTACHMENT 6

RETYPED UNIT 2 TECHNICAL SPECIFICATION PAGES
(For information only)

The attached retype reflects the currently issued version of the Technical Specifications. Pending Technical Specification changes or Technical Specification changes issued subsequent to this submittal are not reflected in the enclosed retype. The enclosed retype should be checked for continuity with Technical Specifications prior to issuance.

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2.0 SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

2.1 SAFETY LIMITS

2.1.1 REACTOR CORE

DNBR

2.1.1.1 The combination of THERMAL POWER, pressurizer pressure, and maximum cold leg coolant temperature shall not exceed the limits shown on Figure 2.1-1.

APPLICABILITY: MODES 1 and 2.

ACTION:

Whenever the combination of THERMAL POWER, pressurizer pressure and maximum cold leg coolant temperature has exceeded the limits shown on Figure 2.1-1, be in HOT STANDBY within 1 hour.

REACTOR COOLANT SYSTEM PRESSURE

2.1.2 The Reactor Coolant System pressure shall not exceed 2750 psia.

APPLICABILITY: MODES 1, 2, 3, 4 and 5.

ACTION:

MODES 1 and 2

Whenever the Reactor Coolant System pressure has exceeded 2750 psia, be in HOT STANDBY with the Reactor Coolant System pressure within its limit within 1 hour.

MODES 3, 4 and 5

Whenever the Reactor Coolant System pressure has exceeded 2750 psia, reduce the Reactor Coolant System pressure to within its limit within 5 minutes.

INSTRUMENTATION

REMOTE SHUTDOWN SYSTEM

LIMITING CONDITION FOR OPERATION

3.3.3.5 The remote shutdown system functions shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

a. With one or more remote shutdown system functions inoperable either
1) restore the inoperable function to OPERABLE status within 30 days, or
2) be in HOT SHUTDOWN within the next 12 hours.

b. The provisions of Specification 3.0.4 are not applicable.

c. Separate action entry is allowed for each function.

SURVEILLANCE REQUIREMENTS

4.3.3.5.1 Each remote shutdown instrumentation channel shall be demonstrated OPERABLE by performance of a CHANNEL CHECK for each channel that is normally energized at least once per 31 days.

4.3.3.5.2 Each remote shutdown system instrumentation channel shall be demonstrated OPERABLE by performance of a CHANNEL CALIBRATION at least once per 18 months. Neutron detectors are excluded from the CHANNEL CALIBRATION.

4.3.3.5.3 The OPERABILITY of the reactor trip breaker open/closed indication shall be demonstrated by performance of a CHANNEL FUNCTIONAL TEST at least once per 18 months.

4.3.3.5.4 Each remote shutdown system instrumentation transfer switch and control circuit shall be demonstrated OPERABLE by verifying its capability to perform its intended function(s) at least once per 18 months.

TABLE DELETED

TABLE DELETED

INSTRUMENTATION

ACCIDENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.6 The accident monitoring instrumentation channels shown in Table 3.3-10 shall be OPERABLE.

APPLICABILITY: *MODES 1, 2 and 3.*

ACTION:

a. Not used.

b.* With the number of OPERABLE accident monitoring channels less than the Minimum Channels OPERABLE requirements of Table 3.3-10, either restore one channel to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours.

c. With the number of OPERABLE Channels one less than the Required Number of Channels shown in Table 3.3-10, either restore the inoperable channel to OPERABLE status within 30 days if repairs are feasible without shutting down or prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 14 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.

d.** With the number of OPERABLE Channels less than the Minimum Channels OPERABLE *requirements of Table 3.3-10, either restore one channel to* OPERABLE status within 7 days if repairs are feasible without shutting down or:

1. Initiate an alternate method of monitoring the reactor vessel inventory; and

2. Prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 14 days outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status, and

3. *Restore the Channel to OPERABLE status at the next scheduled* refueling.

e. The provisions of Specification 3.0.4 are not applicable.

f. Separate action entry is allowed for each instrument.

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* Action statements do not apply to Reactor Vessel Level Monitoring System, Containment Sump Water Level (narrow range) and Containment Sump Water Level (wide range) instruments.

** Action statements apply only to Reactor Vessel Level Monitoring System, Containment Sump Water Level (narrow range) and Containment Sump Water Level (wide range) instruments.

PLANT SYSTEMS

AUXILIARY FEEDWATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 At least three independent steam generator auxiliary feedwater pumps and associated flow paths shall be OPERABLE with:

a. Two feedwater pumps, each capable of being powered from separate OPERABLE emergency busses, and

b. One feedwater pump capable of being powered from an OPERABLE steam supply system.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

a. With one auxiliary feedwater pump inoperable, restore the required auxiliary feedwater pumps to OPERABLE status within 72 hours or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.

b. With two auxiliary feedwater pumps inoperable be in at least HOT STANDBY within 6 hours and in HOT SHUTDOWN within the following 6 hours.

c. With three auxiliary feedwater pumps inoperable, immediately initiate corrective action to restore at least one auxiliary feedwater pump to OPERABLE status.

SURVEILLANCE REQUIREMENTS

4.7.1.2 Each auxiliary feedwater pump shall be demonstrated OPERABLE:

a. At least once per 31 days by:

1. Verifying that each valve (manual, power-operated, or automatic) in the flow path that is not locked, sealed, or otherwise secured in position, is in its correct position.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

b. At least once per 18 months during shutdown by:

   1. Verifying that each automatic valve in the flowpath path actuates to its correct position upon receipt of an auxiliary feedwater actuation test signal.

   2. Verifying that each pump starts automatically upon receipt of an auxiliary feedwater actuation test signal.

c. Following an extended cold shutdown (30 days or longer) and prior to entering MODE 2, a flow test shall be performed to verify the normal flow path from the condensate storage tank (CST) to the steam generators.

d. By verifying the developed head of each AFW pump at the flow test point is greater than or equal to the required developed head when tested in accordance with the Inservice Testing Program. The provisions of Specification 4.0.4 are not applicable for entry into MODE 3 when testing the steam turbine-driven AFW pump and this Surveillance must be performed within 24 hours after entering MODE 3 and prior to entering MODE 2.

REFUELING OPERATIONS

LOW WATER LEVEL

LIMITING CONDITION FOR OPERATION

3.9.8.2 The independent shutdown cooling loops shall be OPERABLE and at least one shutdown cooling shall be in operation.**

APPLICABILITY: MODE 6 when the water level above the top of the reactor pressure vessel flange is less than 23 feet.

ACTION:

a. With less than the required shutdown cooling loops OPERABLE, within 1 hour initiate corrective action to return the required loops to OPERABLE status, or to establish greater than or equal to 23 feet of water above the reactor pressure vessel flange, as soon as possible.

b. *With no shutdown cooling loop in operation, suspend operations that would* cause introduction into the RCS, coolant with boron concentration less than required to meet the boron concentration of Technical Specification 3.9.1 and within 1 hour initiate corrective action to return the required shutdown cooling loop to operation. Close all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere within 4 hours.

SURVEILLANCE REQUIREMENTS

4.9.8.2 At least once per 12 hours:

a. At least one shutdown cooling loop shall be verified to be in operation.

b. The total flow rate of reactor coolant to the reactor pressure vessel shall be verified to be greater than or equal to 3000 gpm.*

---

* The reactor coolant flow rate requirement may be reduced to 1850 gpm if the following conditions are satisfied before the reduced requirement is implemented: the reactor has been determined to have been subcritical for at least 125 hours, the maximum RCS temperature is $\leq$ 117°F, and the temperature of CCW to the shutdown cooling heat exchanger is $\leq$ 87°F.

** One required shutdown cooling loop may be inoperable for up to 2 hours for surveillance testing, provided that the other shutdown cooling loop is OPERABLE and in operation.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

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

6.1.2 The Shift Supervisor, or during his absence from the control room, a designated individual, shall be responsible for the control room command function. A management directive to this effect, signed by the corporate officer with direct responsibility for the plant, shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

ONSITE AND OFFSITE ORGANIZATION

6.2.1 An onsite and an offsite organization shall be established for unit operation and corporate management. This onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including all operating organization positions. Those relationships shall be documented and updated, as appropriate, in the form of organizational charts. These organizational charts will be documented in the Topical Quality Assurance Report and updated in accordance with 10 CFR 50.54(a)(3). The plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications shall be documented in the UFSAR or the Topical Quality Assurance Report.

b. A specified corporate officer shall be responsible for overall plant nuclear safety. This individual shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support in the plant so that continued nuclear safety is assured.

c. The plant manager shall be responsible for overall unit safe operation and shall have control over those onsite resources necessary for safe operation and maintenance of the plant.

d. Although the individuals who train the operating staff and those who carry out the quality assurance functions may report to the appropriate manager onsite, they shall have sufficient organizational freedom to be independent from operating pressures.

e. Although health physics individuals may report to any appropriate manager onsite, for matters relating to radiological health and safety of employees and the public, the radiation protection manager shall have direct access to that onsite individual having responsibility for overall unit management. Health physics personnel shall have the authority to cease any work activity when worker safety is jeopardized or in the event of unnecessary personnel radiation exposures.

6.0 ADMINISTRATIVE CONTROLS

6.2 ORGANIZATION (Continued)

UNIT STAFF

6.2.2 The unit organization shall be subject to the following:

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

b. DELETED

c. A health physics technician# shall be on site when fuel is in the reactor.

d. Either a licensed SRO or licensed SRO limited to fuel handling who has no concurrent responsibilities during this operation shall be present during fuel handling and shall directly supervise all CORE ALTERATIONS.

e. DELETED

f. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., licensed senior reactor operators (SROs), licensed reactor operators (ROs), health physicists, auxiliary operators, and key maintenance personnel). The administrative procedures shall include guidelines on working hours that ensure that adequate shift coverage shall be maintained without routine heavy use of overtime.

   Any deviation from the above guidelines shall be authorized by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned. Routine deviation from the working hour guidelines shall not be authorized.

g. The operations supervisor shall hold a Senior Reactor Operator License.

The health physics technician may be less than the minimum requirement for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

6.0 ADMINISTRATIVE CONTROLS

6.2.3 SHIFT TECHNICAL ADVISOR FUNCTION

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

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI / ANS-3.1-1978 for comparable positions, except for:

(1) the radiation protection manager who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975,

(2) the Shift Technical Advisor who shall have specific training in plant design and plant operating characteristics, including transients and accidents, and any of the following educational requirements:

- Bachelor's degree in engineering from an accredited institution; or
- Professional Engineer's (PE) license obtained by successful completion of the PE examination; or
- Bachelor's degree in engineering technology from an accredited institution, including course work in the physical, mathematical, or engineering sciences, or
- Bachelor's degree in physical science from an accredited institution, including course work in the physical, mathematical, or engineering sciences.

(3) the Multi-Discipline Supervisors who shall meet or exceed the following requirements:

a. Education: Minimum of a high school diploma or equivalent.

b. Experience: Minimum of four years of related technical experience, which shall include three years power plant experience of which one year is at a nuclear power plant.

c. Training: Complete the Multi-Discipline Supervisor training program.

For the purpose of 10 CFR 55.4, a licensed senior reactor operator and a licensed reactor operator are those individuals who, in addition to meeting the requirements of 6.3.1, perform the functions described in 10 CFR 50.54(m).

6.0 ADMINISTRATIVE CONTROLS

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the training manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI / ANS-3.1-1978 and 10 CFR Part 55 and the supplemental requirements specified in Section A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees, and shall include familiarization with relevant industry operational experience.

6.5 DELETED

6.6 REPORTABLE EVENTS ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR Part 50, and

b. Each REPORTABLE EVENT shall be reviewed by the FRG, and the results of this review shall be submitted to the CNRB, and the corporate officer responsible for overall plant nuclear safety.

6.7 DELETED

6.8 PROCEDURES AND PROGRAMS

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

a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, and those required for implementing the requirements of NUREG 0737.

b. Refueling operations.

c. Surveillance and test activities of safety-related equipment.

d. Not Used.

e. Not Used.

6.0 ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

6.8.4 The following programs shall be established, implemented, maintained, and shall be audited under the cognizance of the CNRB:

a. Primary Coolant Sources Outside Containment

A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the Shutdown Cooling System, High Pressure Safety Injection System, Containment Spray System, and RCS Sampling. The program shall include the following:

(i) Preventive maintenance and periodic visual inspection requirements, and

(ii) Integrated leak test requirements for each system at least once per 18 months.

The provisions of Specification 4.0.2 are applicable.

b. In-Plant Radioiodine Monitoring

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

(i) Training of personnel,

(ii) Procedures for monitoring, and

(iii) Provisions for maintenance of sampling and analysis equipment.

ADMINISTRATIVE CONTROLS

f. Radioactive Effluent Controls Program

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

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

2) Limitations on the concentration of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to ten times the concentration values in 10 CFR 20.1001 – 20.2401, Appendix B, Table 2, Column 2.

3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM,

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

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

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

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

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

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

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

9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater

than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,

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

The provisions of Specifications 4.0.2 and 4.0.3 are applicable to the Radioactive Effluent Controls Program surveillance frequency.

g. Radiological Environmental Monitoring Program

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

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

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

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

h. Containment Leakage Rate Testing Program

A program to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50 Appendix J, Option B, as modified by approved exemptions. This program is in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," as modified by the following exception(s):

a) Bechtel Topical Report, BN-TOP-1 or ANS 56.8-1994 (as recommended by R.G. 1.163) will be used for type A testing.

b) The first Type A test performed after the June 1992 Type A test shall be no later than June 2007.

The peak calculated containment internal pressure for the design basis loss of coolant accident P_a, is 41.8 psig. The containment design pressure is 44 psig.

The maximum allow containment leakage rate, L_a, at P_a, shall be 0.50% of containment air weight per day.

ANNUAL REPORTS (Continued)

greater than 100 mrems/yr and their associated man-rem exposure according to work and job functions,[2/] e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignments to various duty functions may be estimated based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total Deep Dose Equivalent received from external sources should be assigned to specific major work functions.

b. 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 the limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than the 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 REPORTS

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

[2/] This tabulation supplements the requirements of 20.2206 of 10 CFR Part 20.

6.13 PROCESS CONTROL PROGRAM (PCP)

Changes to the PCP:

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2q. This documentation shall contain:

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

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

2. Shall become effective after review and acceptance by the Facility Review Group and the approval of the plant manager.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

1. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2q. This documentation shall contain:

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

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

2. Shall become effective after review and acceptance by the Facility Review Group and the approval of the plant manager.

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

ATTACHMENT 7

PROPOSED MARK-UP OF UNIT 1 AFFECTED BASES
(For information only)

(FOR INFORMATION ONLY)

3/4.3 **INSTRUMENTATION** (continued)

BASES (continued)

3/4.3.3 **MONITORING INSTRUMENTATION**

3/4.3.3.1 **RADIATION MONITORING INSTRUMENTATION**

The OPERABILITY of the radiation monitoring channels ensures that 1) the radiation levels are continually measured in the areas served by the individual channels; and (2) the alarm or automatic action is initiated when the radiation level trip setpoint is exceeded; and (3) sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," December 1980 and NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.

3/4.3.3.2 **Deleted**

3/4.3.3.3 **Deleted**

3/4.3.3.4 **Deleted**

3/4.3.3.5 **REMOTE SHUTDOWN INSTRUMENTATION**

The OPERABILITY of the remote shutdown instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT SHUTDOWN of the facility from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criteria 19 of 10 CFR 50.

Insert 1

Insert Relocated Table 3.3-9

Insert 2

(FOR INFORMATION ONLY)

INSERTS to Unit 1 TS Bases 3/4.3 Page 4

Insert 1

A function of a remote shutdown system is OPERABLE if the required number of divisions listed in Table B 3.3-9 are OPERABLE. The remote shutdown system instrumentation covered by this LCO do not need to be energized to be considered OPERABLE. This LCO is intended to ensure that the Functions will be OPERABLE if plant conditions require that the Remote Shutdown System be placed in operation.

Action c states that separate Action entry is allowed for each Function. This Action has been added for clarification. The actions of this Specification may be entered independently for each function. Allowable outage time(s) of the inoperable function(s) will be tracked separately for each function starting from the time the action was entered for that function.

Insert 2

3/4.3.3.8 ACCIDENT MONITORING INSTRUMENTATION

The OPERABILITY of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, Instrumentation for Light-Water-Cooled Nuclear Plants to Assess Plant Conditions During and Following an Accident, December 1975, and NUREG 0578, TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations.

Action c states that separate Action entry is allowed for each Instrument. This Action has been added for clarification. The actions of this Specification may be entered independently for each Instrument listed on Table 3.3-11. Allowable outage time(s) of the inoperable channel(s) of an Instrument will be tracked separately for each Instrument starting from the time the action was entered for that Instrument.

<Relocate to Bases>

TABLE 3.3-9 (B)

REMOTE SHUTDOWN ~~MONITORING~~ SYSTEM INSTRUMENTATION

Function ~~INSTRUMENT~~	~~READOUT LOCATION~~	~~MEASUREMENT RANGE~~	Required Number of Divisions ~~MINIMUM CHANNELS OPERABLE~~
1. Reactor Trip Breaker Indication	SWGR	OPEN-CLOSE	1/trip breaker
2. Pressurizer Pressure	Hot Shutdown Panel	1500-2500 psia	1
3. Pressurizer Level	Hot Shutdown Panel	0-100%	1
4. Main Steam Pressure	Hot Shutdown Panel	0-1200 psig	1/steam generator
5. Steam Generator Level	Hot Shutdown Panel	0-100%	1/steam generator
6. Cold Leg Temperature	Hot Shutdown Panel	0-600°F	1

(FOR INFORMATION ONLY)

3/4.9 **REFUELING OPERATIONS** (continued)

BASES (continued)

3/4.9.8 **SHUTDOWN COOLING AND COOLANT CIRCULATION** (continued)

The requirement to have two shutdown cooling loops OPERABLE when there is less than 23 feet of water above the irradiated fuel in the core ensures that a single failure of the operating shutdown cooling loop will not result in a complete loss of decay heat removal capability. With the reactor vessel head removed and 23 feet of water above the irradiated fuel in the core, a large heat sink is available for core cooling, thus in the event of a failure of the operating shutdown cooling loop, adequate time is provided to initiate emergency procedures to cool the core.

Insert

3/4.9.9 **CONTAINMENT ISOLATION SYSTEM**

The OPERABILITY of this system ensures that the containment isolation valves will be automatically isolated upon detection of high radiation levels within the containment. The OPERABILITY of this system is required to restrict the release of radioactive material resulting from a fuel handling accident of a recently irradiated fuel assembly from the containment atmosphere to the environment.

Recently irradiated fuel is defined as fuel that has occupied part of a critical reactor core within the previous 72 hours.

3/4.9.4.10 and 3/4.9.11 **WATER LEVEL – REACTOR VESSEL AND STORAGE POOL WATER LEVEL**

The restrictions on minimum water level ensure that sufficient water depth is available to remove 99% of the assumed 10% iodine gap activity released from the rupture of an irradiated fuel assembly. The minimum water depth is consistent with the assumptions of the accident analysis.

3/4.9.12 **FUEL POOL VENTILATION SYSTEM – FUEL STORAGE**

The limitations on the fuel handling building ventilation system ensures that all radioactive material released from a recently irradiated fuel assembly will be filtered through the HEPA filters and charcoal adsorber prior to discharge to the atmosphere. The OPERABILITY of this system and the resulting iodine removal capacity are consistent with the assumptions of the fuel handling accident analyses.

(FOR INFORMATION ONLY)

INSERT to Unit 1 TS Bases 3/4.9, Page 7

Specification 3.9.8.2 is modified by a footnote that allows one shutdown cooling loop to be inoperable for a period of 2 hours provided the other loop is OPERABLE and in operation. Prior to declaring the loop inoperable, consideration should be given to the existing plant configuration. This consideration should include the core time to boil, that there is no draining operation to further reduce RCS water level, and that the capability exists to inject borated water into the reactor vessel. This permits surveillance tests to be performed on the inoperable loop during a time when these tests are safe and possible.

ATTACHMENT 8

PROPOSED MARK-UP OF UNIT 2 AFFECTED BASES
(For information only)

(FOR INFORMATION ONLY)

3/4.3 **INSTRUMENTATION** (continued)

BASES (continued)

3/4.3.3 **MONITORING INSTRUMENTATION** (continued)

3/4.3.3.2 **DELETED**

3/4.3.3.3 **DELETED**

3/4.3.3.4 **DELETED**

3/4.3.3.5 **REMOTE SHUTDOWN INSTRUMENTATION**

The OPERABILITY of the remote shutdown instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT STANDBY of the facility from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criteria 19 of 10 CFR 50.

The OPERABILITY of the remote shutdown system instrumentation ensures that a fire will not preclude achieving safe shutdown. The remote shutdown system instrumentation, control circuits, and transfer switches are independent of areas where a fire could damage systems normally used to shut down the reactor. This capability is consistent with General Design Criterion 3 and Appendix R to 10 CFR Part 50.

3/4.3.3.6 **ACCIDENT MONITORING INSTRUMENTATION** Insert 1

The OPERABILITY of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Plants to Assess Plant Conditions During and Following an Accident," December 1975 and NUREG 0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations."

3/4.3.3.7 **DELETED**

3/4.3.3.8 **DELETED**

Insert 2

Insert Relocated Table 3.3-9

(FOR INFORMATION ONLY)

INSERTS to Unit 2 TS Bases 3/4.3 Page 5

Insert 1

A function of a remote shutdown system is OPERABLE if the required number of divisions listed in Table B 3.3-9 are OPERABLE. The remote shutdown system instrumentation and control circuits covered by this LCO do not need to be energized to be considered OPERABLE. This LCO is intended to ensure that the functions will be OPERABLE if plant conditions require that the remote shutdown system be placed in operation.

Action "c" states that separate action entry is allowed for each function. This action has been added for clarification. The actions of this Specification may be entered independently for each function. Allowable outage time(s) of the inoperable function(s) will be tracked separately for each function starting from the time the action was entered for that function.

Insert 2

Action "e" states that separate action entry is allowed for each Instrument. This action has been added for clarification. The actions of this Specification may be entered independently for each Instrument listed on Table 3.3-10. Allowable outage time(s) of the inoperable channel(s) of an Instrument will be tracked separately for each Instrument starting from the time the action was entered for that instrument.

<Relocate to Bases>

TABLE 3.3-9 (B)

REMOTE SHUTDOWN SYSTEM INSTRUMENTATION

Function / INSTRUMENT	READOUT LOCATION	CHANNELS RANGE	REQUIRED NUMBER OF CHANNELS	Required Number of Divisions / MINIMUM CHANNELS OPERABLE
1. Power Range Neutron Flux	Hot Shutdown Panel	2×10^{-8}% - 200%	2	1
2. Reactor Trip Breaker Indication	Reactor Trip Switch Gear (RB)	OPEN-CLOSE	1/trip breaker	1/trip breaker
3. Reactor Coolant Temperature – T_{Cold}	Hot Shutdown Panel	0°F - 600°F	2	1
4. Pressurizer Pressure	Hot Shutdown Panel	0 - 3000 psia	2	1
5. Pressurizer Level	Hot Shutdown Panel	0 - 100% level	2	1
6. Steam Generator Pressure	Hot Shutdown Panel	0 - 1200 psia	1/steam generator	1/steam generator
7. Steam Generator Level	Hot Shutdown Panel	0 - 100% level	2/steam generator	1/steam generator
8. Shutdown Cooling Flow Rate	Hot Shutdown Panel	0 - 5000 gpm	2	1
9. Shutdown Cooling Temperature	Hot Shutdown Panel	0°F - 350°F	2	1
10. Diesel Generator Voltage	Hot Shutdown Panel	0 - 5250 V	1/diesel generator	1/diesel generator
11. Diesel Generator Power	Hot Shutdown Panel	0 - 5000 kW	1/diesel generator	1/diesel generator
12. Atmospheric Dump Valve Pressure	Hot Shutdown Panel	0 - 1200 psig	1/steam generator	1/steam generator
13. Charging Flow/Pressure	Hot Shutdown Panel	0 - 150 gpm/ 0 - 3000 psia	2	1
CONTROLS/ISOLATE SWITCHES				
14 → 14. Atmospheric Stm Dump Controllers	Hot Shutdown Panel/ RAB431	N.A.	2/steam generator	1/steam generator
15 → 15. Aux. Spray Valves	Hot Shutdown Panel/ RAB431	N.A	2	1
16 → 16. Charging Pump Controls	Hot Shutdown Panel/ RAB431	N.A	3	2
17 → 17. Letdown Isol Valve	Hot Shutdown Panel/ RAB431	N.A	3	2
18 → 18. AFW Pump/Valve Controls	Hot Shutdown Panel/ RAB431	N.A	3	2
19 → 19. AFW Pump Steam Inlet Valve	Hot Shutdown Panel/ RAB431	N.A	2	1
20 → 20. Pzr Heater Controls	Hot Shutdown Panel/ RAB431	N.A	6	3

(FOR INFORMATION ONLY)

3/4.9 **REFUELING OPERATIONS** (continued)

BASES (continued)

3/4.9.8 **SHUTDOWN COOLING AND COOLANT CIRCULATION** (continued)

The requirement to have two shutdown cooling loops OPERABLE when there is less than 23 feet of water above the reactor pressure vessel flange with irradiated fuel in the core ensures that a single failure of the operating shutdown cooling loop will not result in a complete loss of decay heat removal capability. With the reactor vessel head removed and 23 feet of water above the reactor pressure vessel flange with irradiated fuel in the core, a large heat sink is available for core cooling, thus in the event of a failure of the operating shutdown cooling loop, adequate time is provided to initiate emergency procedures to cool the core. Insert

The footnote providing for a minimum reactor coolant flow rate of ≥ 1850 gpm considers one of the two RCS injection points for a SDCS train to be isolated. The specified parameters include 50 gpm for flow measurement uncertainty, and 3°F uncertainty for RCS and CCW temperature measurements. The conditions of minimum shutdown time, maximum RCS temperature, and maximum temperature of CCW to the shutdown cooling heat exchanger are initial conditions specified to assure that a reduction in flow rate from 3000 gpm to 1800 gpm will not result in a temperature transient exceeding 140°F during conditions when the RCS water level is at an elevation ≥ 29.5 feet.

3/4.9.9 **CONTAINMENT ISOLATION SYSTEM**

The OPERABILITY of this system ensures that the containment isolation valves will be automatically isolated upon detection of high radiation levels within the containment. The OPERABILITY of this system is required to restrict the release of radioactive material resulting from a fuel handling accident of a recently irradiated fuel assembly from the containment atmosphere to the environment. Recently irradiated fuel is defined as fuel that has occupied parts of a critical reactor core within the previous 72 hours.

(FOR INFORMATION ONLY)

INSERT to Unit 2 TS Bases 3/4.9, Page 7

Specification 3.9.8.2 is modified by a footnote that allows one shutdown cooling loop to be inoperable for a period of 2 hours provided the other loop is OPERABLE and in operation. Prior to declaring the loop inoperable, consideration should be given to the existing plant configuration. This consideration should include the core time to boil, that there is no draining operation to further reduce RCS water level, and that the capability exists to inject borated water into the reactor vessel. This permits surveillance tests to be performed on the inoperable loop during a time when these tests are safe and possible.