SONGS Units 2 and 3 Soluble Boron Credit

Propose Change Number (PCN) 556

Introduction, Purpose and Background

Purpose of SCE Presentation

- Present an overview of the proposed SONGS spent fuel storage Technical Specifications and Licensee Controlled Specifications.

- Discuss submittal schedule and expected review time

- Obtain NRC feedback on the proposed change

History of SCE Request for Soluble Boron Credit

- 2/22/02 SCE submitted PCN 536
  - Prepared in anticipation of Boraflex panels dissolving
  - Created a Fuel Storage Program – Section 5 of TS
- 5/8/03 SCE withdrew PCN 536
- SCE has revised and renumbered the request. PCN 536 will be resubmitted as PCN 556
  - Revised to ensure compliance with 10 CFR 50.36, follow NUREG 1432, and maintain consistency with current TS and LCS.

Overview of PCN 556

Proposed PCN 556 Outline

- TS 3.7.17 minimum boron concentration will increase from 1850 ppm to 2000 ppm
  - SCE will take credit for 970 ppm for reactivity hold down purposes, instead of taking credit for 0 ppm

- LCO 3.7.18 will contain new and revised Figures to define fuel assembly parameters for acceptable unrestricted storage

Proposed PCN 556 Outline

- TS 4.3.1 will be revised
  - K_{eff} will be change from <= 0.95 to <= 1.0 for SFP fully flooded with unborated water
  - K_{eff} <= 0.95 is maintained for SFP with 1700 ppm boron
- Guide Tube Inserts
  - Neutron poison rods may be used for reactivity hold down

Proposed PCN 556 Outline

- LCS 4.0.100
  - Currently contains Checkerboard loading patterns for Region II storage
  - Proposed change has 54 tables and figures to define acceptable loading patterns for both Region I and Region II

Proposed PCN 556 Outline

- Instead of reapplying for a 10 CFR 50.74 exemption, SCE will comply with 10 CFR 50.68

Proposed Changes to LCO 3.7.17

3.7 PLANT SYSTEMS

3.7.17 Fuel Storage Pool Boron Concentration

LCO 3.7.17 The fuel storage pool boron concentration shall be ≥ ~~1850~~2000 ppm.

APPLICABILITY: Whenever any fuel assembl~~ies~~ ~~are~~is stored in the fuel storage pool~~, and a fuel storage pool verification has not been performed since the last movement of fuel assemblies in the fuel storage pool.~~

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Fuel storage pool boron concentration not within limit.	----------NOTE---------- LCO 3.0.3 is not applicable. ----------	
	A.1 Suspend movement of fuel assemblies in the fuel storage pool.	Immediately
	AND	
	A.2~~.1~~ Initiate action to restore fuel storage pool boron concentration to within limit.	Immediately
	~~OR~~	
	~~A.2.2 Verify by administrative means Region II fuel storage pool verification has been performed since the last movement of fuel assemblies in the fuel storage pool.~~	~~Immediately~~

Proposed Changes to LCO 3.7.18

3.7 PLANT SYSTEMS

3.7.10 Spent Fuel Assembly Storage

LCO 3.7.10 The combination of initial enrichment and burnup of each SONGS 2 and 3 spent fuel assembly stored in Region I~~s~~ shall be within the acceptable burnup domain of Figure 3.7.10-1 or Figure 3.7.10-2, or the fuel assembly shall be stored in accordance with ~~License Controlled~~ Technical Specification 4.3.1.1~~c.1.a~~.

The combination of initial enrichment and burnup of each SONGS 2 and 3 spent fuel assembly stored in Region II shall be within the acceptable burnup domain of Figure 3.7.10-3 or Figure 3.7.10-4, or the fuel assembly shall be stored in accordance with Technical Specification 4.3.1.1.

~~The burnup of a~~ Each SONGS 1 uranium dioxide spent fuel assembly stored in Region II ~~shall be greater than or equal to 10.3 GWD/T for interior locations or 5.1 GWD/T for peripheral locations, or the fuel assembly~~ shall be stored in accordance with ~~License Controlled~~ Technical Specification 4.3.1.1~~b.1.b~~.

APPLICABILITY: Whenever any fuel assembly is stored in ~~Region II of~~ the fuel storage pool.

ACTIONS

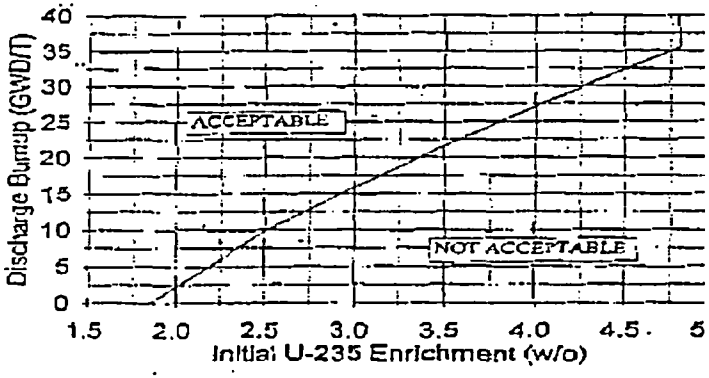
CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Requirements of the LCO not met.	A.1 .....NOTE..... LCO 3.0.3 is not applicable. ..... Initiate action to ~~move~~ bring the noncomplying fuel assembly ~~from Region I~~ into compliance.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.10.1	Verify by administrative means the initial enrichment, ~~and burnup~~, and cooling time of the fuel assembly ~~were~~ in accordance with LCO 3.7.10.	Prior to ~~storing~~ *removing* a fuel assembly ~~in Region I or II~~ to any spent fuel storage location.

Proposed Change to 3.7.18

Two curves similar to the curve on the left are to be replaced by 4 curves similar to the curve on the right.

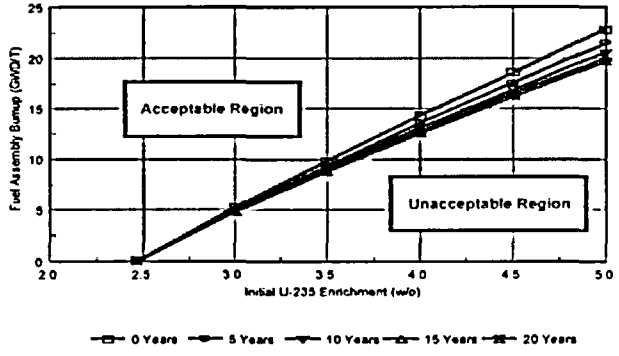


MINIMUM BURNUP VS. INITIAL ENRICHMENT FOR UNRESTRICTED PLACEMENT OF SONGS 2 AND 3 FUEL IN REGION II RACKS

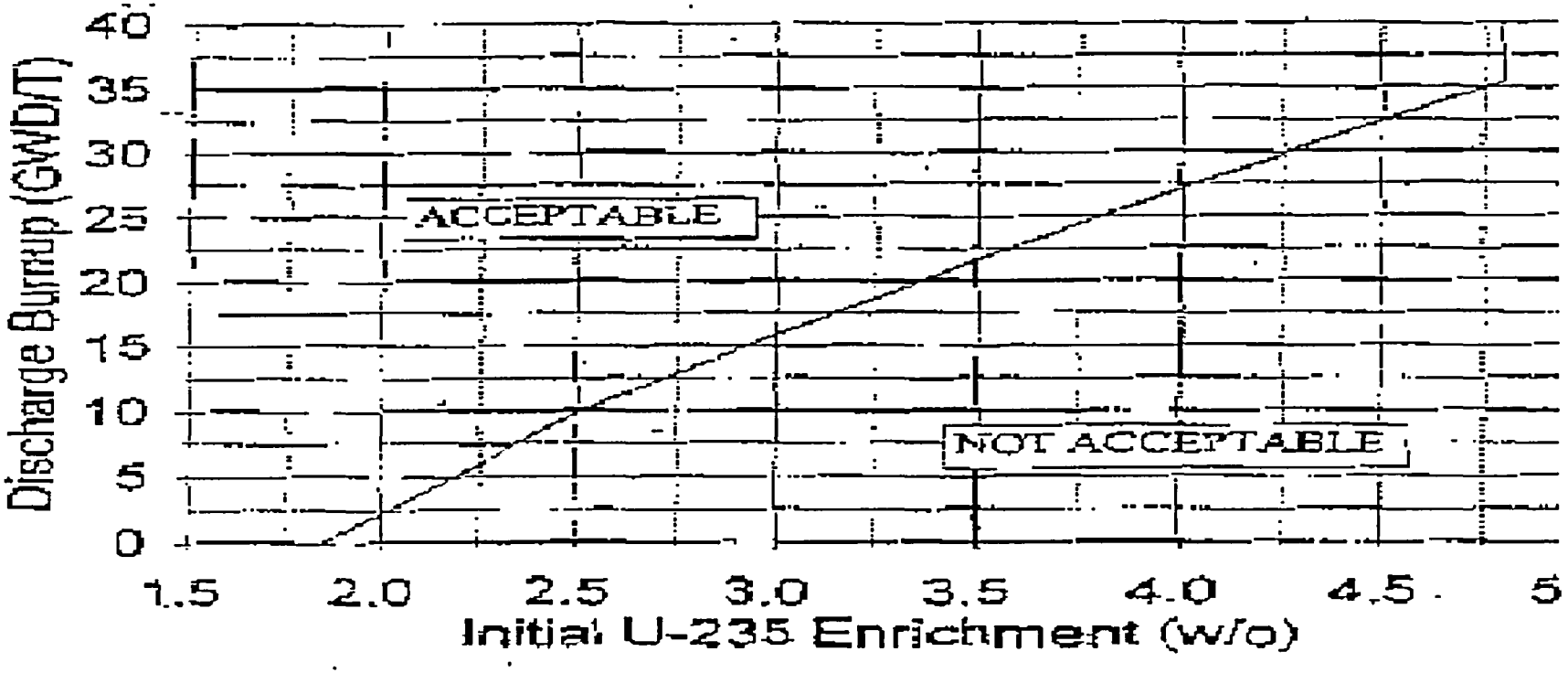
FIGURE 3.7.18-1

FIGURE 3.7.18-1

MINIMUM BURNUP AND COOLING TIME VS. INITIAL ENRICHMENT
FOR
UNRESTRICTED PLACEMENT OF SONGS 2 AND 3 FUEL
IN
REGION I RACKS



Proposed Change to 3.7.18



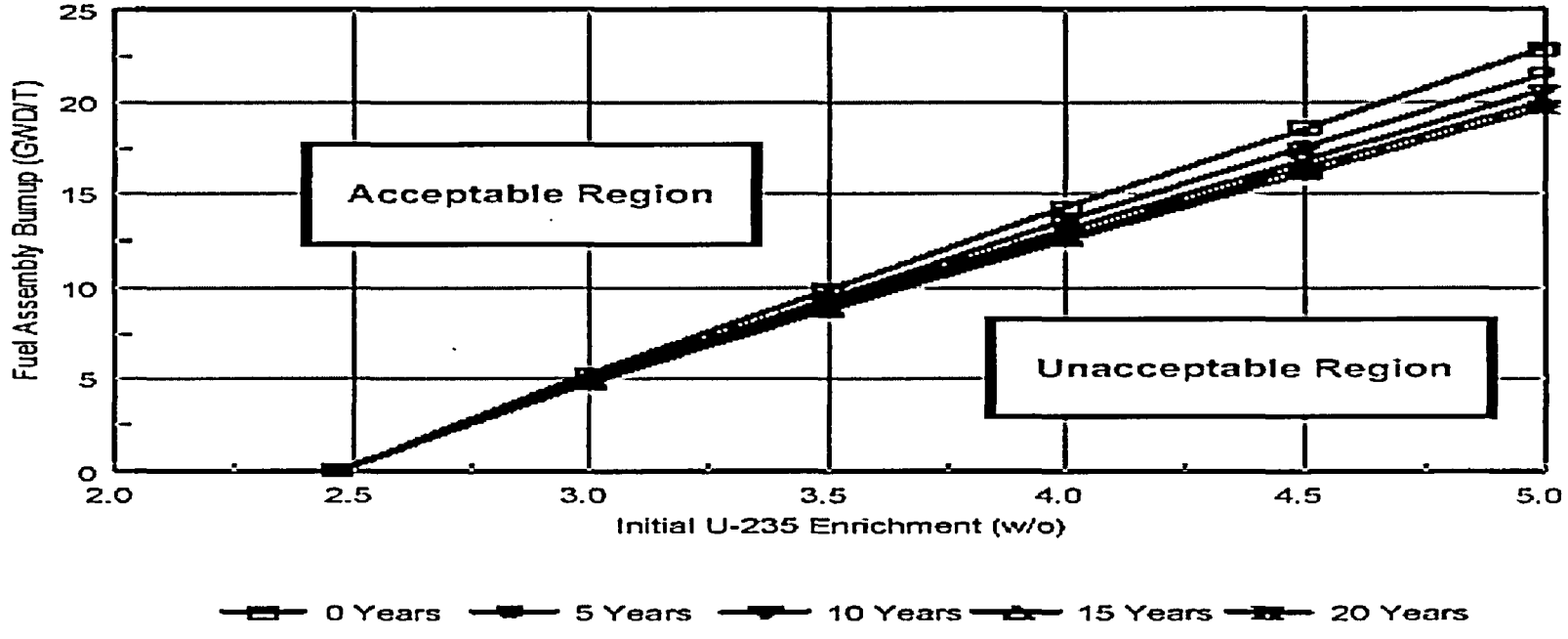
MINIMUM BURNUP VS. INITIAL ENRICHMENT FOR UNRESTRICTED PLACEMENT OF SONGS 2 AND 3 FUEL IN REGION II RACKS

FIGURE 3.7.18-1

Proposed Change to 3.7.18

FIGURE 3.7.18-1

MINIMUM BURNUP AND COOLING TIME VS. INITIAL ENRICHMENT
FOR
UNRESTRICTED PLACEMENT OF SONGS 2 AND 3 FUEL
IN
REGION I RACKS



Proposed Changes to Design Features 4.3.1 Criticality

4.3.1 Criticality

4.3.1.1 The spent fuel storage racks are designed and shall be maintained with:

a. Fuel assemblies having a maximum U-235 enrichment of 4.8 weight percent;

b. $k_{eff} \leq$ ~~0.95~~ 1.0 if fully flooded with unborated water, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR;

c. $k_{eff} \leq 0.95$ if fully flooded with water borated to 1700 ppm, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR;

d. Borated stainless steel, guide tube inserts (GI-Insert) may be installed in an assembly's center guide tube and in any diagonally opposite guide tubes. Fuel containing GI-Inserts may be placed in either Region 1 or Region 11. However, credit for GI-Inserts is only taken for Region 11 storage.

~~c~~e. A nominal 9.05 inch center to center distance between fuel assemblies placed in Region 11;

~~d~~f. A nominal 10.40 inch center to center distance between fuel assemblies placed in Region 1;

~~e. Units 1, 2, and 3 fuel assemblies may be stored in Region 1 with no restrictions;~~

~~f~~g Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.10-1 are allowed unrestricted storage in Region ~~11~~1;

~~g~~h Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.10-2 are allowed unrestricted storage in the peripheral pool locations with 1 or 2 faces toward the spent fuel pool walls of in Region ~~11~~1;

(continued)

4.3.1 Criticality (continued)

i. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.10-3 are allowed unrestricted storage in Region II;

j. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.10-4 are allowed unrestricted storage in the peripheral pool locations with 1 or 2 faces toward the spent fuel pool walls of Region II;

~~k~~. Units 2 and 3 ~~f~~fuel assemblies with a burnup in the "unacceptable range" of Figure 3.7.10-1, Figure 3.7.10-2, Figure 3.7.10-3, and Figure 3.7.10-~~4~~ will be stored in compliance with the Licensee Controlled Specification 4.0.100 Rev. 2 dated XX/XX/XX; and

~~l~~. ~~the burnup of e~~each SQNSS 1 uranium dioxide spent fuel assembly stored in Region II shall ~~be greater than or equal to 10.0 GWD/T for interior locations or 5.5 GWD/T for peripheral locations, or the fuel assembly shall~~ be stored in accordance with Licensee Controlled Specification 4.0.100 Rev. 2 dated XX/XX/XX.

Summary of Technical Specifications

LCO			
3.7.17	SFP Boron		1850 → 2000
3.7.18	SFP Storage		
	Figure	Name	LCS Fuel Type
	18-1	Unrestricted in Region I	I-1
	18-2	Peripheral in Region I	I-2
	18-3	Unrestricted in Region II	I-3
	18-4	Peripheral in Region II	I-4
4.3.1	a through l	Design Contraints & Keff Limits Points to LCS 4.0.100 for the storage of fuel assemblies in the "unacceptable" region of the 3.7-18 Figures	

Proposed Changes to Licensee Control Specification

LCS 4.0.100 Fuel Storage Patterns

4.0 DESIGN FEATURES

LCS 4.0.100 Fuel Storage Patterns ~~for Region II Racks and Region II Racks Reconstitution Station~~

CAUTION:

This Licensee Controlled Specificaton is controlled by the U.S. Nuclear Regulatory Commission. Any and all changes to this LCS must be approved by the NRC via the amendment application process.

VALIDITY STATEMENT: Rev. ~~24~~ effective upon NRC approval ~~12/1/91~~, to be implemented within ~~150~~ days.

4.0.100 New or burned fuel (which does not meet the criteria of LCO 3.7.18 for unrestricted storage or storage at the pool periphery) may be stored in Region I or Region II ~~of all the~~ in accordance with the allowable Storage Patterns described in this LCS. ~~following conditions are met:~~

4.0.100.1 Region I - Region I Storage Patterns are given in Tables I-1 through I-8 and Figures I-1 through I-9.
~~Fuel Type 1 - New or burned fuel which does not meet the criteria of LCO 3.7.18 for unrestricted storage or storage at the pool periphery.~~

4.0.100.2 Region II - Region II Storage Patterns are given in Tables II-1 through II-15 and Figures II-1 through II-22.
~~Fuel Type 2 - Fuel which does not meet the criteria of LCO 3.7.18 for unrestricted storage in Region II.~~

~~(A) Fuel Type 2 shall have initial enrichment not to exceed~~

~~(B) Fuel Type 2 shall be stored in Region II in a checkerboard pattern. The four (4) basic requirements for Region II storage are:~~

~~(1) Type 2 fuel assemblies can not be in adjacent locations. They can, however, be in diagonal locations.~~

~~(2) Type 2 fuel assemblies stored in Region II shall have at least two (2) sides facing an empty location.~~

~~(3) The checkerboard pattern does not need to be separated by an empty row from other fuel assemblies normally stored in Region II.~~

~~(4) Figure 4.0.100-1 provides an illustration of an acceptable fuel storage pattern.~~

4.0.100.3 SONGS Unit 1 Fuel shall not be stored in Region I Racks.

4.0.100.4 The burnup of each SONGS Unit 1 uranium dioxide spent fuel assembly stored in Region II shall meet the following criteria:

~~(5) A reconstitution station is a special case of a checkerboard pattern. The above rules for checkerboarding permit a reconstitution station anywhere in the Region II racks. Single or multiple row reconstitution stations are permitted. Figure 4.0.100-2 provides an illustration.~~

~~(6) Any SONFUEL Unit 1 fuel assemblies may be stored in Region II in a three out of four pattern if the assembly burnup is at least 1.7 GWD/T.~~

4.0.100.4.1 SONGS Unit 1 nominal 3.40 w/o assemblies can be stored in the Region II Racks (unrestricted) if:

the burnup is greater than 25,000 MWD/T, and
the cooling time is greater than 5 years.

4.0.100.4.2 SONGS Unit 1 nominal 4.00 w/o assemblies can be stored in the Region II Racks (unrestricted) if:

the burnup is greater than 26,300 MWD/T, and
the cooling time is greater than 20 years.

the burnup is greater than 27,100 MWD/T, and
the cooling time is greater than 15 years.

the burnup is greater than 28,200 MWD/T, and
the cooling time is greater than 10 years.

4.0.100.4.3 SONGS Unit 1 nominal 4.00 w/o assemblies can be stored in the Region II Racks (SFP periphery) if:

the burnup is greater than 20,000 MWD/T, and
the cooling time is greater than 0 years.

4.0.100.5 Design Requirements For Guide Tube Inserts

(1) Gl-Inserts shall be 0.75 inches O.D. minimum, completely cover the active fuel region (150 inches), and have a minimum boron content of 0.02434 grams of B-10 per cm^2.

(ii) Three (3) or 5 Gl-inserts are allowed. The orientation of every fuel assembly with 3 guide tube inserts shall be the same (Figure II-23).

(iii) A 5-finger, full length Control Element Assembly (CEA) may be used in place of Gl-inserts.

4.0.100.6 Design requirements For Erbia

Assemblies containing 40 or 80 erbia rods shall have the erbia rods distributed per Figures II-24 and II-25. The minimum initial normal erbia loading shall be 2.0 w/o Er203.

4.0.100.7 The Failed Fuel Rod Storage Basket (FFRSB)

The Failed Fuel Rod Storage Basket (FFRSB) shall be treated as if it were an assembly with enrichment and burnup of the rod in the basket with the most limiting combination of enrichment and burnup.

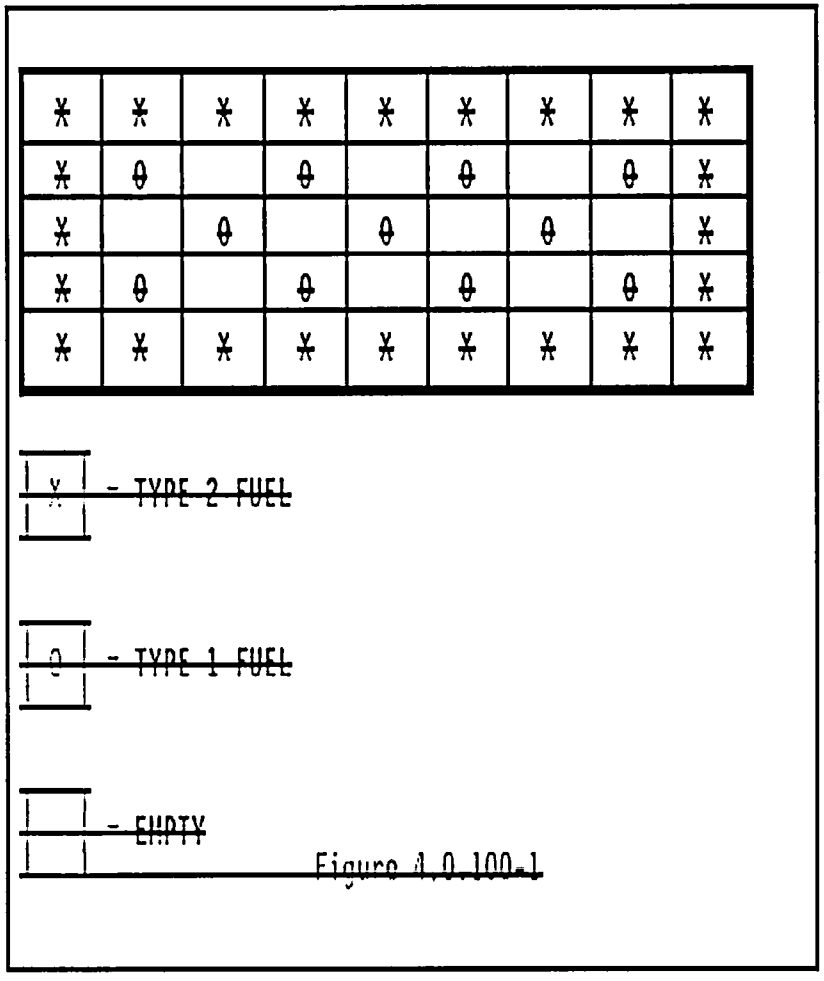
4.0.100.8 Non-Fuel Components

Neutron sources and non-fuel bearing assembly components (thimble plugs, CEAs, etc) may be stored in fuel assemblies without affecting the storage requirements of these assemblies. A storage basket containing no fissile material can be stored in any storage location, and can be used as a storage cell blocker for reactivity control.

4.0.100.9 Fuel Assembly Reconstitution Station

A fuel assembly reconstitution station is a special case of a checkerboard pattern. A reconstitution station is permitted anywhere in the Region I racks. The empty cells in the checkerboard pattern do not need to be blocked. A reconstitution station is permitted anywhere in the Region II racks provided that empty cells in the checkerboard pattern are blocked to make it impossible to misload a fuel assembly during reconstitution activities.

The two figures below are to be replaced by 54 tables and figures



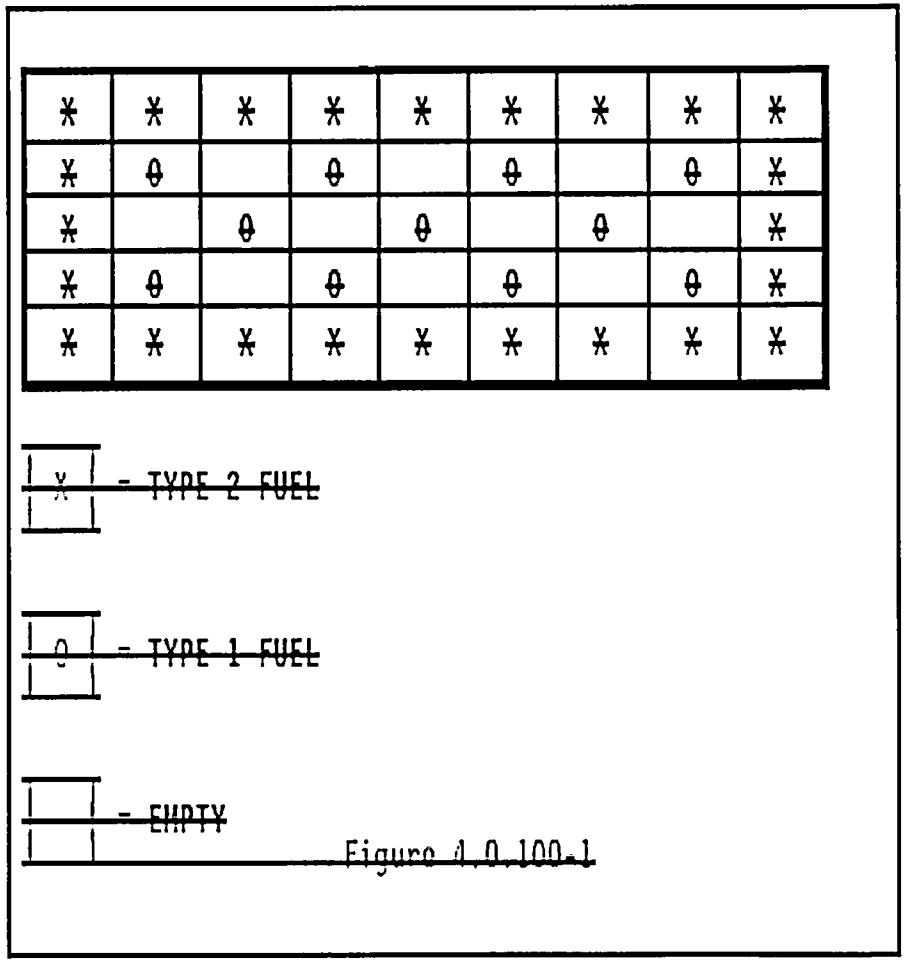


Table I-3

REGION I

Category I-3 Fuel
(Filler Assembly For 1-out-of-4 Pattern)

Initial Enrichment (w/o)	Minimum Burnup (GWD/T) 0 Years Cooling	5 Years Cooling	10 Years Cooling	15 Years Cooling	20 Years Cooling
5.00	39.99	36.28	34.27	33.04	32.22
4.50	34.95	31.71	29.94	28.84	28.12
4.00	29.71	26.99	25.46	24.51	23.89
3.50	24.22	22.03	20.79	20.02	19.52
3.00	18.37	16.84	15.91	15.34	14.97
2.50	12.21	11.30	10.72	10.37	10.13
2.00	5.28	5.05	4.85	4.72	4.62
1.71	0.00	0.00	0.00	0.00	0.00

4.80 Fresh	Category I-3
Category I-3	Category I-3

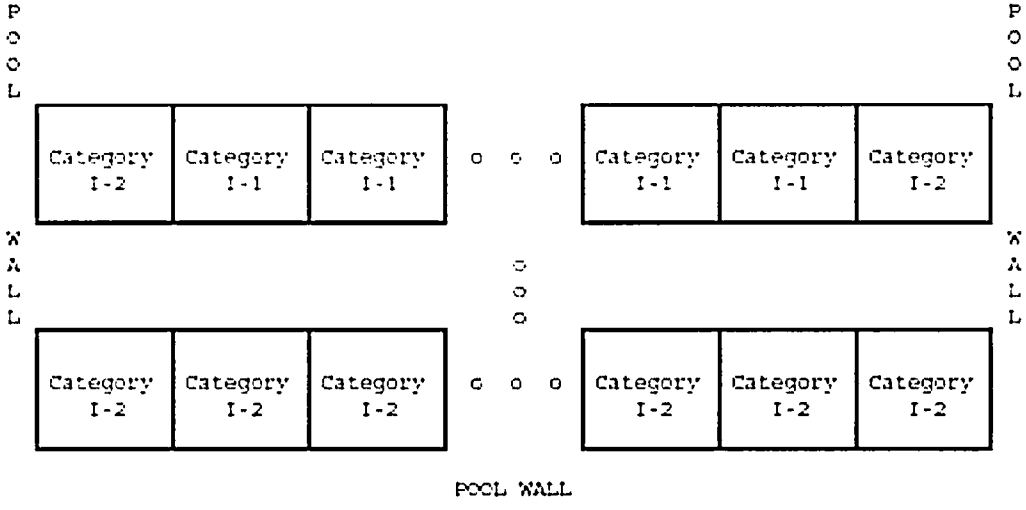
Example Table

Table I-2

REGION I

Category I-2 Fuel
(SFP Peripheral Storage)

Initial Enrichment (w/o)	Minimum Burnup (GWD/MTU) 0 Years Cooling	5 Years Cooling	10 Years Cooling	15 Years Cooling	20 Years Cooling
5.00	12.55	12.15	11.82	11.61	11.47
4.50	9.09	8.85	8.63	8.49	8.40
4.00	5.50	5.43	5.33	5.25	5.21
3.50	2.22	2.12	2.09	2.05	2.03
3.20	0.00	0.00	0.00	0.00	0.00

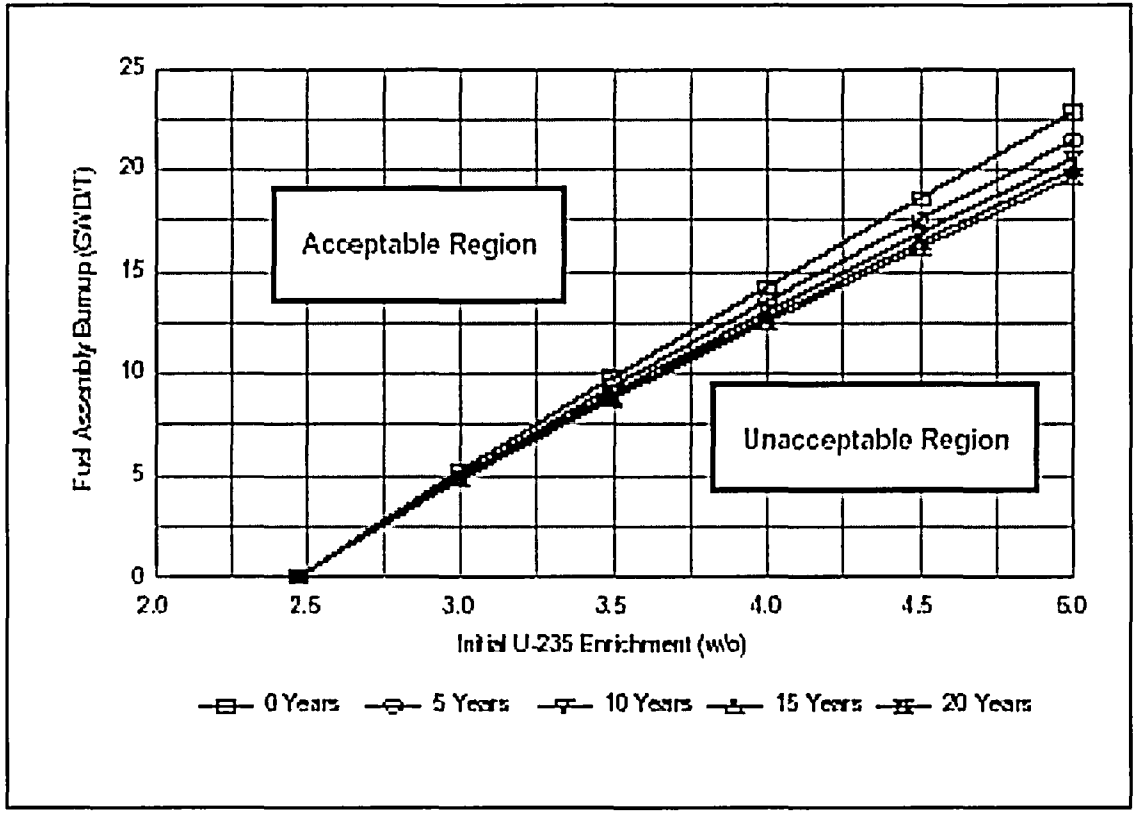


Example Table

Figure I-1

REGION I

MINIMUM BURNUP FOR CATEGORY I-1 FUEL



Example Figure

Figure I-7

REGION I

Boundary Between All Cell Storage And Checkerboard Storage

I-1	I-1	I-1	I-1	I-1	I-1
I-1	I-1	I-1	I-1	I-1	I-1
I-1	I-1	I-1	I-1	I-1	I-1
I-1	Empty	I-1	I-1	I-1	I-1
Empty	4.90	Empty	I-1	I-1	I-1
4.90	Empty	I-1	I-1	I-1	I-1

Interface

I-1	I-1	I-1	I-1	I-1	I-1
I-1	I-1	I-1	I-1	I-1	I-1
I-1	I-1	I-1	I-1	I-1	I-1
I-1	I-4	I-1	I-1	I-1	I-1
I-4	I-6	I-4	I-1	I-1	I-1
I-6	I-4	I-1	I-1	I-1	I-1

Interface

Note: (1) A row of empty cells can be used at the interface to separate the configurations.

(2) It is acceptable to replace an assembly with an empty cell.

Example Figure

Summary of Licensee Controlled Specifications

LCS

Region I	Tables	I-1 → I-8
	Figures	I-1 → I-9
Region II	Tables	II-1 → II-15
	Figures	II-1 → II-22
Guide Tube	Figure	II-23
Erbia Fuel Assemblies	Figures	I-24, 25

Summary of Licensee Controlled Specifications

Region I Fuel Types & Layouts			
Table	Name	Category	Figure
I-1	Unrestricted	I-1	I-1
I-2	SFP Peripheral	I-2	I-2
I-3	1 out of 4	I-3	I-3
I-4	4.8% Fresh Fuel Checkerboard	”	”
I-5	4.8% with 5-finger CEA’s	”	”
I-6	Filler Assembly for 1 of 4 (4.8 fresh/80 Erbia rods per fuel assembly)	I-4	I-4
I-7	Filler Assembly for 1 of 4 (4.8 fresh/40 Erbia rods per fuel assembly)	I-5	I-5
I-8	4.8% Depleted to 18 GWD/MTU	I-6	I-6

Summary of Licensee Controlled Specifications

Region I Boundary Definitions	
Name	Figure
Unrestricted & fresh Fuel Checkerboard (I-1)	I-7
Unrestricted & Checkerboard of I-4 & I-6	”
Unrestricted & 1 of 4 (I-1 & I-3)	I-8
4.8% Fresh fuel Checkerboard & 1 of 4 (I-1 & I-3)	I-9
Checker board I4 & I6 & 1 of 4 (I-1 & I-3)	”

Summary of Licensee Controlled Specifications

Region II			
Table	Name	Category	Figure
II-1	Unrestricted	II-1	II-1
II-2	Peripheral Storage	II-2	II-2
II-3	Checkerboard for II-4	II-3	II-3
	Checkerboard for II-3	II-4	II-4
II-4	Checkerboard for II-6	II-5	II-5
	Checkerboard for II-6	II-6	II-6
II-5	Checkerboard with fresh		
II-6	3 of 4	II-7	II-7
II-7	Unrestricted with 5 inserts	II-8	II-8
II-8	Unrestricted with 3 inserts	II-9	II-9

Summary of Licensee Controlled Specifications

Region II (Continued)			
Table	Name	Category	Figure
II-9	1 of 9 filler with 5 inserts 4.8 without inserts	II-10	II-10
II-10	1 of 9 filler with 5 inserts 4.8 with 5 inserts	II-11	II-11
II-11	1 of 9 filler with 3 inserts 4.8 with 5 inserts	II-12	II-12
II-12	1 of 9 filler with 0 inserts 4.8 with 5 inserts	II-13	II-13
II-13	4.8 Depleted to 18 GWD/MTU	II-14	II-14
"	1 of 9 filler for II-14	II-13	"
II-14	4.8 Depleted to 18 GWD/MTU	II-14	"
"	1 of 9 filler to II-14 (5 inserts)	II-11	"
II-15	Unrestricted with 5 finger CEA	II-15	II-15

Summary of Licensee Controlled Specifications

Region II Boundary Definitions	
Name	Figure
Unrestricted & Checkerboard (I-1)	II-16
Unrestricted & Checkerboard (II-3, II-4)	”
Unrestricted & 3 of 4 storage (II-7)	II-17
Checkerboard (II-1) & 3 of 4 storage (II-7)	II-18
1 out of 9 and unrestricted storage (II-1)	II-19
1 out of 9 and checkerboard (II-3, II-4)	II-20
1 out of 9 and checkerboard (II-1)	II-21
1 out of 9 and 3 out of 4 (II-7 & blocked)	II-22

Summary of Licensee Controlled Specifications

Others Figures			
Table	Name	Category	Figure
	Guide Tube insert orientation for 3 inserts		II-23
	40 Erbia rods per fuel assembly		II-24
	80 Erbia rods per fuel assembly		II-25

Basis for Proposed Technical Specifications and Licensee Controlled Specifications

Basis

- Meets the Requirements of 10 CFR 50.36
- Follows NUREG 1432, Revision 3
- Maintains consistency with existing Technical Specifications and Licensee Control Specifications

Meets 10 CFR 50.36 Criteria

- (A) *Criterion 1*. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

- **(B) *Criterion 2*. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.**

- (C) *Criterion 3*. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

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

Follows NUREG 1432
(CEOG STS)

3.7 PLANT SYSTEMS

3.7.18 Spent Fuel Pool Storage

LCO 3.7.18 The combination of initial enrichment and burnup of each fuel assembly stored in [Region 2] shall be within the acceptable [burnup domain] of Figure 3.7.18-1 [or in accordance with Specification 4.3.1.1].

APPLICABILITY: Whenever any fuel assembly is stored in [Region 2] of the fuel storage pool.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Requirements of the LCO not met.	A.1 ----------NOTE---------- LCO 3.0.3 is not applicable. ---------- Initiate action to move the noncomplying fuel assembly from [Region 2].	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.18.1	Verify by administrative means the initial enrichment and burnup of the fuel assembly is in accordance with Figure 3.7.18-1 or Specification 4.3.1.1.	Prior to storing the fuel assembly in [Region 2]

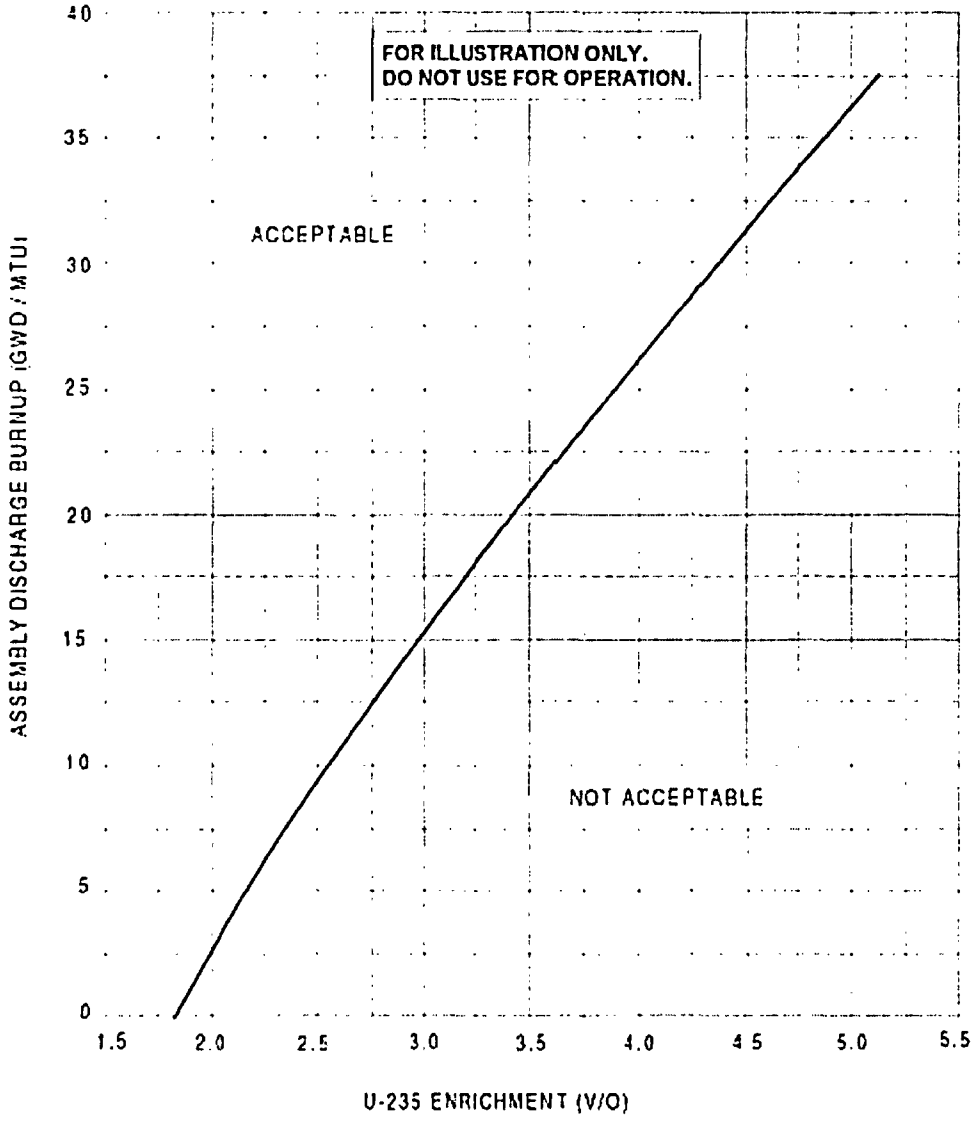


Figure 3.7.18-1 (page 1 of 1)
Discharge Burnup vs. Initial Enrichment for Region II Racks

4.3.1 Criticality

4.3.1.1 The spent fuel storage racks are designed and shall be maintained with:

a. Fuel assemblies having a maximum U-235 enrichment of [4.5] weight percent,

b. $k_{eff} \leq 0.95$ if fully flooded with unborated water, which includes allowance for uncertainties as described in [Section 9.1 of the FSAR],

[c. A nominal [9] inch center to center distance between fuel assemblies placed in [the high density fuel storage racks],]

[d. A nominal [10.4] inch center to center distance between fuel assemblies placed in [the low density fuel storage racks],]

4.3 Fuel Storage (continued)

[e. New or partially spent fuel assemblies with a discharge burnup in the "acceptable range" of Figure [3.7.18-1] may be allowed unrestricted storage in [either] fuel storage rack(s), and]

[f. New or partially spent fuel assemblies with a discharge burnup in the "unacceptable range" of Figure [3.7.18-1] will be stored in compliance with the NRC approved [specific document containing the analytical methods, title, date, or specific configuration or figure].]

Consistent with Current TS and LCS

As shown in the mark-up and discussion of the proposed changes:

- TS 3.7.18 delineates unconditional storage
- TS 4.3.1 delineates design features
- LCS 4.0.100 contains required storage restrictions for fuel not meeting the criteria of unrestricted storage

A Different Approach from Other Applicants

- Other plants have placed all the requirements in the Technical Specifications
- This change would add 60 pages of information to the Technical Specifications
- SCE controls SFP storage by procedure. Fuel movement is controlled step by step following a preplanned sequence

Review and Approval Schedule

- SCE plans to submit PCN 556 in late February or early March of 2005
- SCE will be requesting approval by March of 2006, with a 60-day implementation window
  - This falls between Unit 2 and Unit 3 Cycle 14 refueling outages

NRC Feedback

- Content of TS and LCS
- Guide Tube Inserts
- Review and approval schedule