



January 26, 2006

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

Serial No. 05-471
MPS Lic/MAE R0
Docket No. 50-336
License No. DPR-65

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 2
PROPOSED REVISION TO TECHNICAL SPECIFICATIONS (LBDCR 05-MP2-006)
UPDATING LIST OF DOCUMENTS DESCRIBING THE ANALYTICAL METHODS
SPECIFIED IN TECHNICAL SPECIFICATION 6.9.1.8 B

Pursuant to 10 CFR 50.90, Dominion Nuclear Connecticut, Inc. (DNC) hereby requests to amend Operating License DPR-65 for Millstone Power Station Unit 2 (MPS2). The enclosed license amendment request proposes to update the list of Nuclear Regulatory Commission (NRC) approved documents, specified in Technical Specification (TS) 6.9.1.8 b, which describe the analytical methods used to determine the core operating limits. The enclosed license amendment request also corrects a typographical error in TS 5.3.1, "Reactor Core, Fuel Assembly," which was introduced in the retyped pages provided to the NRC for issuance of amendment No. 280, dated September 25, 2003.

The proposed amendment does not involve a significant impact on public health and safety and does not involve a significant hazards consideration pursuant to the provisions of 10 CFR 50.92.

The Site Operations Review Committee has reviewed and concurred with the determinations.

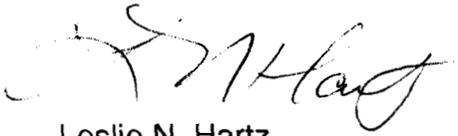
Attachment 1 contains the description of the proposed technical specification (TS) change and the significant hazards consideration. Attachment 2 contains the TS marked-up pages, and Attachment 3 contains the retyped pages.

We request issuance of this amendment no later than August 1, 2006, with the amendment to be implemented within 60 days of issuance.

In accordance with 10 CFR 50.91(b), a copy of this license amendment request is being provided to the State of Connecticut.

If you have any questions or require additional information, please contact Mr. Paul R. Willoughby at (804) 273-3572.

Very truly yours,

A handwritten signature in black ink, appearing to read "L. N. Hartz". The signature is fluid and cursive, with a large initial "L" and "H".

Leslie N. Hartz
Vice President – Nuclear Engineering

Attachments:

1. Evaluation of Proposed License Amendment
2. Marked-Up TS Pages
3. Re-typed TS Pages

Commitments made in this letter: None.

cc: U.S. Nuclear Regulatory Commission
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ATTACHMENT 1

PROPOSED REVISION TO TECHNICAL SPECIFICATIONS (LBDCR 05-MP2-006)
UPDATING LIST OF DOCUMENTS DESCRIBING THE ANALYTICAL METHODS
SPECIFIED IN TECHNICAL SPECIFICATION 6.9.1.8B
EVALUATION OF PROPOSED LICENSE AMENDMENT

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 2

EVALUATION OF PROPOSED LICENSE AMENDMENT

- 1.0 DESCRIPTION
- 2.0 PROPOSED CHANGE
- 3.0 REASON FOR THE PROPOSED AMENDMENT
- 4.0 TECHNICAL ANALYSIS
 - 4.1 Details of the Proposed Amendment
 - 4.2 Safety Summary
- 5.0 REGULATORY ANALYSIS
 - 5.1 No Significant Hazards Consideration
 - 5.2 Applicable Regulatory Requirements/Criteria
- 6.0 ENVIRONMENTAL CONSIDERATION

1.0 DESCRIPTION

Pursuant to 10 CFR 50.90, Dominion Nuclear Connecticut, Inc. (DNC) hereby requests to amend Operating License DPR-65 for Millstone Power Station Unit 2 (MPS2). The enclosed license amendment request proposes to update the list of Nuclear Regulatory Commission (NRC) approved documents, describing the analytical methods used to determine the core operating limits, specified in Technical Specification (TS) 6.9.1.8 b. The enclosed license amendment request also corrects a typographical error in TS 5.3.1, "Reactor Core, Fuel Assembly," which was introduced in the retyped pages provided to the NRC for issuance of amendment No. 280, dated September 25, 2003.

2.0 PROPOSED CHANGES

1- TS 6.9.1.8 b:

Add the following document as document No. 16:

"16) EMF-92-116(P)(A) Revision 0, Generic Mechanical Design Criteria for PWR Fuel Designs, Siemens Power Corporation."

2- TS 5.3.1, "Reactor Core, Fuel Assembly":

TS 5.3.1 currently reads:

"The reactor core shall contain 217 fuel assemblies with each fuel assembly containing 176 rods. Reload fuel shall be similar in physical design to the initial core loading and shall have a **minimum** nominal average enrichment of 4.85 weight percent of U-235. A fuel rod shall have a maximum enrichment of 5.0 weight percent of U-235. "

The word "minimum" is replaced with the word "maximum." TS 5.3.1 will read:

"The reactor core shall contain 217 fuel assemblies with each fuel assembly containing 176 rods. Reload fuel shall be similar in physical design to the initial core loading and shall have a **maximum** nominal average enrichment of 4.85 weight percent of U-235. A fuel rod shall have a maximum enrichment of 5.0 weight percent of U-235. "

3.0 REASON FOR THE PROPOSED AMENDMENT

The reason for adding a new document (No. 16) to TS 6.9.1.8 b is to complement the list of documents used to determine the core operating limits. These

documents have been reviewed and approved by the NRC. The addition of this document was recommended by Framatome-ANP.

The reason for changing the word "minimum" with "maximum" in TS 5.3.1 is to correctly state the limit on nominal average enrichment of reload fuel. This change will correct a typographical error, which was introduced in the process of issuing Amendment No. 280.

4.0 TECHNICAL ANALYSIS

4.1 Details of the Proposed Amendment

1. Technical Specification 6.9.1.8 b:

The proposed change is to add a new document (No. 16) to TS 6.9.1.8 b, which complements the list of documents used to determine the core operating limits. These documents have been reviewed and approved by the NRC. The addition of this document was recommended by Framatome-ANP.

It was stated by Framatome-ANP that the addition of this reference is not a requirement since EMF-92-116(P)(A) is referenced by other documents that are currently listed in TS 6.9.1.8 b. However, the Framatome-ANP recommendation to explicitly include this document as a reference is considered an enhancement to the TS 6.9.1.8 b list.

The topical report EMF-92-116(P)(A) defines the mechanical design acceptance criteria used in evaluating changed or new fuel designs. The mechanical design acceptance criteria are consistent with Section 4.2 of the Standard Review Plan, which defines the specified acceptable fuel design limits. The mechanical design analyses results are compared to the acceptance criteria defined in this topical report to demonstrate acceptable performance of the fuel design. The limits defined in the Core Operating Limits Report (COLR) are supported, in part, by these analyses.

2. Technical Specification 5.3.1, "Reactor Core, Fuel Assembly":

MPS2, Amendment 274, dated April 1, 2003, was the last amendment introducing changes to TS 5.3.1. The issued TS page correctly states:

"5.3.1. The reactor core shall contain 217 fuel assemblies with each fuel assembly containing 176 rods. Reload fuel shall be similar in physical design to the initial core loading and shall have a **maximum** nominal average enrichment of 4.85 weight percent of U-235. A fuel rod shall have a maximum enrichment of 5.0 weight percent of U-235."

Amendment 284, dated September 25, 2003, introduced only changes to TS 5.3.2, "Control Element Assemblies," which is on the same TS page (page 5-4) as TS 5.3.1. However, in the process of producing the retyped pages used to issue amendment No. 280, the word "minimum" was incorrectly used instead the word "maximum." This was a typographical error. The proposed change in this amendment request will restore TS 5.3.1 wording to the wording previously approved by the NRC in Amendment 274.

4.2 Safety Summary

The proposed change is to add a new document (No. 16) to TS 6.9.1.8 b, which complements the list of documents used to determine the core operating limits. These documents have been reviewed and approved by the NRC. Including this document as a reference is considered an enhancement to the TS 6.9.1.8 b list. Therefore, the proposed change does not have any adverse effect on plant safety.

The proposed change to replace the word "minimum" with "maximum" in TS 5.3.1 will restore TS 5.3.1 wording to the wording previously approved by the NRC in Amendment 274. Therefore, the proposed change will have no adverse effect on plant safety.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Consideration

In accordance with 10CFR50.92, DNC has reviewed the proposed amendment and has concluded that it does not involve a significant hazards consideration (SHC). The basis for this conclusion is that the three criteria of 10CFR50.92(c) are not compromised as detailed below.

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

Response: No.

The proposed amendment adds a new document (No. 16) to TS 6.9.1.8 b to complement the list of documents used to determine the core operating limits. These documents have been previously reviewed and approved by the NRC. It also changes the word "minimum" to "maximum" in TS 5.3.1 to correctly state the limit on nominal average enrichment of reload fuel. This change restores TS 5.3.1 wording to the wording previously approved by the NRC in Amendment 274. The proposed changes do not modify any plant equipment and do not impact any failure modes that could lead to an accident.

Additionally, the proposed changes have no effect on the consequence of any analyzed accident since the changes do not affect the function of any equipment credited for accident mitigation. Based on this discussion, the proposed amendment does not increase the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed changes do not modify any plant equipment and there is no impact on the capability of existing equipment to perform its intended functions. No system setpoints are being modified and no changes are being made to the method in which plant operations are conducted. No new failure modes are introduced by the proposed change. The proposed amendment does not introduce accident initiators or malfunctions that would cause a new or different kind of accident. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

The proposed amendment adds a new document (No. 16) to TS 6.9.1.8 b to complement the list of documents used to determine the core operating limits. These documents have been previously reviewed and approved by the NRC. It also changes the word "minimum" to "maximum" in TS 5.3.1 to correctly state the limit on nominal average enrichment of reload fuel. This change restores TS 5.3.1 wording to the wording previously approved by the NRC in Amendment 274. The proposed changes have no impact on plant equipment operation. The proposed changes do not revise any setpoints nor do they change the acceptance criteria used in the accident analyses. Therefore, the proposed changes will not result in a reduction in a margin of safety.

As described above, this license amendment request does not impact the probability of an accident previously evaluated, does not involve a significant increase in the consequences of an accident previously evaluated, does not create the possibility of a new or different kind of accident from any accident previously evaluated, and does not result in a significant reduction in a margin of safety. Therefore, DNC has concluded that the proposed changes do not involve an SHC.

5.2 Applicable Regulatory Requirements/Criteria

In an effort to avoid TS changes for every fuel reload cycle that results in changes to the cycle-specific parameter limits, the NRC approved relocating the cycle-specific core operating parameters from the TSs to the COLR, which is a licensee controlled document, in amendment No. 260, dated December 18, 2001. Generic Letter (GL) 88-16, "Removal of Cycle-Specific Parameter Limits From Technical Specifications," dated October 3, 1988, provides guidance for the preparation of license amendment requests to relocate cycle-specific TS information to the COLR. The guidance in GL 88-16 states that licensees shall identify in the Administrative Controls, Reporting Requirements section of the TSs, the previously approved analytical methods used to determine the core operating limits by identifying the topical report number, title, and date or identify the NRC staff's safety evaluation (SE) report for a plant-specific methodology by NRC letter and date.

In a letter dated December 15, 1999 (Letter from S. A. Richards [USNRC] to J. F. Mallay, Siemens Power Corporation, "Acceptance for Siemens References to Approved Topical Reports in Technical Specifications [TAC No. MA6492]," December 15, 1999.), the NRC staff accepted a method proposed by Siemens Power Corporation of referencing approved topical reports. The proposed method would allow licensees to use current topical reports to support limits in the COLR without having to submit an amendment request for the facility operating license each time a revision to the topical report is approved by the NRC. This method would allow the references to approved topical reports in the TS to be cited using the report number and title. The citation in the COLR would include specific information for each of the TS references to topical reports used to prepare the COLR (i.e., report number, title, revision, date, and any supplements). The NRC in TSTF-363 subsequently approved this method of referencing for incorporation into the standard technical specifications.

The proposed change to add a new document No. 16 to TS 6.9.1.8 b is conforming to the above mentioned method of referencing approved by the NRC.

6.0 ENVIRONMENTAL CONSIDERATION

DNC has determined that the proposed amendment would not change requirements with respect to use of a facility component located within the restricted area, as defined by 10CFR20, nor would it change inspection or surveillance requirements. DNC has evaluated the proposed change and has determined that the change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released off site, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed

amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

ATTACHMENT 2

PROPOSED REVISION TO TECHNICAL SPECIFICATIONS (LBDCR 05-MP2-006)
UPDATING LIST OF DOCUMENTS DESCRIBING THE ANALYTICAL METHODS
SPECIFIED IN TECHNICAL SPECIFICATION 6.9.1.8 B

TECHNICAL SPECIFICATIONS MARKED-UP PAGES

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 2

DESIGN FEATURES

5.3 REACTOR CORE

FUEL ASSEMBLIES

5.3.1 The reactor core shall contain 217 fuel assemblies with each fuel assembly containing 176 rods. Reload fuel shall be similar in physical design to the initial core loading and shall have a ~~minimum~~ nominal average enrichment of 4.85 weight percent of U-235. A fuel rod shall have a maximum enrichment of 5.0 weight percent of U-235.

CONTROL ELEMENT ASSEMBLIES

5.3.2 The reactor core shall contain 73 control element assemblies. The control element assemblies shall be designed and maintained in accordance with the design provisions contained in Section 3.0 of the FSAR with allowance for normal degradation pursuant to the applicable Surveillance Requirements. ①

5.4 DELETED

ADMINISTRATIVE CONTROLSMONTHLY OPERATING REPORT (Con't)

Administrator, Region I, and one copy to the NRC Resident Inspector, no later than the 15th of each month following the calendar month covered by the report.

CORE OPERATING LIMITS REPORT

6.9.1.8 a. Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle.

| | |
|-----------|--|
| 3/4.1.1.1 | SHUTDOWN MARGIN (SDM) |
| 3/4.1.1.4 | Moderator Temperature Coefficient |
| 3/4.1.3.6 | Regulating CEA Insertion Limits |
| 3/4.2.1 | Linear Heat Rate |
| 3/4.2.3 | Total Integrated Radial Peaking Factor - F_r^T |
| 3/4.2.6 | DNB Margin |

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

- 1) EMF-96-029(P)(A) Volumes 1 and 2, "Reactor Analysis System for PWRs Volume 1 - Methodology Description, Volume 2 -Benchmarking Results," Siemens Power Corporation.
- 2) ANF-84-73 Appendix B (P)(A), "Advanced Nuclear Fuels Methodology for Pressurized Water Reactors: Analysis of Chapter 15 Events," Advanced Nuclear Fuels.
- 3) XN-NF-82-21(P)(A), "Application of Exxon Nuclear Company PWR Thermal Margin Methodology to Mixed Core Configurations," Exxon Nuclear Company.
- 4) XN-75-32(P)(A) Supplements 1 through 4, "Computational Procedure for Evaluating Fuel Rod Bowing," Exxon Nuclear Company.
- 5) EFN-2328(P)(A), "PWR Small Break LOCA Evaluation Model S-RELAP5 Based," Framatome ANP.
- 6) EMF-2087(P)(A), "SEM/PWR-98: ECCS Evaluation Model for PWR LBLOCA Applications," Siemens Power Corporation.
- 7) XN-NF-44(NP)(A), "A Generic Analysis of the Control rod Ejection Transient for Pressurized water reactors," Exxon Nuclear Company.

ADMINISTRATIVE CONTROLSCORE OPERATING LIMITS REPORT (CONT.)

- 8) XN-NF-621(P)(A), "Exxon Nuclear DNB Correlation for PWR Fuel Designs," Exxon Nuclear Company.
- 9) XN-NF-82-06(P)(A), and Supplements 2, 4 and 5, "Qualification of Exxon Nuclear Fuel for Extended Burnup," Exxon Nuclear Company.
- 10) ANF-88-133(P)(A) and Supplement 1, "Qualification of Advanced Nuclear Fuels PWR Design Methodology for Rod Burnups of 62 GWd/MTU," Advanced Nuclear Fuels Corporation.
- 11) XN-NF-85-92(P)(A), "Exxon Nuclear Uranium Dioxide/Gadolinia Irradiation Examination and Thermal Conductivity Results," Exxon Nuclear Company.
- 12) ANF-89-151(P)(A), "ANF-RELAP Methodology for Pressurized Water Reactors: Analysis of Non-LOCA Chapter 15 Events," Advanced Nuclear Fuels Corporation.
- 13) EMF-1961 (P)(A), "Statistical Setpoint/Transient Methodology for Combustion Engineering Type Reactors," Siemens Power Corporation.
- 14) EMF-2130(P)(A), "SRP Chapter 15 Non-LOCA Methodology for Pressurized Water Reactors," Framatome ANP.
- 15) EMF-92-153(P)(A) and Supplement 1, "HTP: Departure from Nucleate Boiling Correlation for High Thermal Performance Fuel," Siemens Power Corporation.

Insert A

- c. The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits) of the safety analysis are met.
- d. The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the U.S. Nuclear Regulatory Commission, Document Control Desk, Washington, D.C. 20555, one copy to the Regional Administrator, Region I, and one copy to the NRC Resident Inspector within the time period specified for each report. These reports shall be submitted covering the activities identified below pursuant to the requirements of the applicable reference specification:

- a. Deleted

Insert A to Page 6-19

- 16) EMF-92-116(P)(A) Revision 0, Generic Mechanical Design Criteria for PWR Fuel Designs, Siemens Power Corporation.

ATTACHMENT 3

PROPOSED REVISION TO TECHNICAL SPECIFICATIONS (LBDCR 05-MP2-006)
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TECHNICAL SPECIFICATIONS RE-TYPED PAGES

DOMINION NUCLEAR CONNECTICUT, INC.
MILLSTONE POWER STATION UNIT 2

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5.4 DELETED

CORE OPERATING LIMITS REPORT (CONT.)

- 8) XN-NF-621(P)(A), "Exxon Nuclear DNB Correlation for PWR Fuel Designs," Exxon Nuclear Company.
 - 9) XN-NF-82-06(P)(A), and Supplements 2, 4 and 5, "Qualification of Exxon Nuclear Fuel for Extended Burnup," Exxon Nuclear Company.
 - 10) ANF-88-133(P)(A) and Supplement 1, "Qualification of Advanced Nuclear Fuels PWR Design Methodology for Rod Burnups of 62 GWd/MTU," Advanced Nuclear Fuels Corporation.
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ADMINISTRATIVE CONTROLS

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- a. Deleted
- b. Deleted
- c. Deleted
- d. ECCS Actuation, Specifications 3.5.2 and 3.5.3.
- e. Deleted
- f. Deleted
- g. RCS Overpressure Mitigation, Specification 3.4.9.3.
- h. Deleted
- i. Tendon Surveillance Report, Specification 6.25
- j. Steam Generator Tube Inspection, Specification 4.4.5.1.5.
- k. Accident Monitoring Instrumentation, Specification 3.3.3.8.
- l. Radiation Monitoring Instrumentation, Specification 3.3.3.1.
- m. Deleted

6.10 Deleted.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

ADMINISTRATIVE CONTROLS

6.12 HIGH RADIATION AREA

As provided in paragraph 20.1601(c) of 10 CFR Part 20, the following controls shall be applied to high radiation areas in place of the controls required by paragraph 20.1601(a) and (b) of 10 CFR Part 20:

6.12.1 High Radiation Areas with Dose Rates Not Exceeding 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation

- a. Each entryway to such an area shall be barricaded and conspicuously posted as a high radiation area. Such barricades may be opened as necessary to permit entry or exit of personnel or equipment.
- b. Access to, and activities in, each such area shall be controlled by means of a Radiation Work Permit (RWP) or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.