I. OVERVIEW / SIGNATURES

Facility: Waterford 3

Document Reviewed: TRM Change **Change/Rev.** NA

System Designator(s)/Description: NA

Description of Proposed Change

The following administrative and editorial changes are proposed to the TRM.

(1)The major proposed administrative change is to replace the applicability of Technical Specification (TS) 3.0 and 4.0 to the Technical Requirements Manual (TRM), with a TRM Applicability Section (TRM 3.0/4.0 Section).

(2) This administrative change will also replace the requirement in TRM Actions for TRM 3.7.13 (Switchgear Area Ventilation System), TRM 3.7.14.b (Essential Instrument Air), and TRM 3.8.3.1.a (Onsite Power Distribution Systems) to initiate a Condition Report (CR) and perform a GMPO approved evaluation to justify continued operation with a requirement to enter TRM LCO 3.0.3. TRM LCO 3.0.3 will require communication with the GMPO or designee, the initiation of a CR to document the condition, and the determination of any limitations for plant continued operation.

(3) The editorial changes proposed will affect several TRM Specifications, the Index, and the Responsibility Matrix to ensure congruity with the added TRM 3.0/4.0 Sections. These editorial changes include reinsertion of exclusion statements to 3.0.3 and 3.0.4 in TRM specification for: fire protection (FP) 3.7.10.1, 3.7.10.2, 3.7.10.4, 3.7.10.5 and 3.7.11; radioactive effluents (Rad Eff) 3.11.1.2, 3.11.1.3, 3.1.2.2, 3.11.2.3, 3.11.2.4, 3.11.3, 3.11.4; and radiological environmental monitoring (REMP) 3.12.1, 3.12.2 and 3.12.3 previously approved as part of the plant TS. TS Amendments 50 for FP (2/1989) and 68 for Rad Eff/REMP (4/1991) relocated the operational conditions, remedial actions, and test requirements to the Fire Protection Program UNT 005-013 and the Offsite Dose Calculation Manual (ODCM) UNT 005-014, respectively. In 1995, these requirements were extracted from the above administrative documents and placed into the TRM. The fire protection requirements were removed from the administrative document and relocated to the TRM. The Radioactive effluent and REMP requirements resided in both the administrative documents and the TRM, eventually being deleted from the administrative documents in the late 1990s. The TS 3.0.3 and 3.0.4 non-applicability statements that were contained in the TS for the FP and Rad Eff/REMP were omitted when relocated to the TRM from the various administrative documents. The remaining editorial changes are associated with ensuring congruity with the added TRM 3.0/4.0 applicability section.

(4) This change also proposes to delete the shutdown statement from the Hydrogen Analyzer Specification and replace it with a requirement to enter TRM LCO 3.0.3.

(5) The deletion of TS 3.0.3 from the TRM essentially removes the shutdown requirements from the TRM when the ACTION requirements cannot be completed or the allowed outage time to complete the ACTION cannot be met, or there is no action for the condition specified. The following LCOs will be affected by the deletion of the shutdown requirements, but will not require changes to the LCO or ACTION requirements. The impact of this change on these affected LCOs will be addressed in this evaluation: (a) LCO 3.3.4, turbine overspeed protection, (b) LCO 3.4.9, Structural Integrity, (c) LCO 3.6.1.5, Containment Average Temperature, (d) All the fire protection TRMs, (e) LCO 3.11.3, Solid Radioactive Waste, and (f) LCO 3.6.4.1, Hydrogen Analyzer.

If the proposed activity, in its entirety, involves any one of the criteria below, check the appropriate box, provide a justification/basis in the Description above, and forward to a Reviewer. No further 50.59 Review is required. If none of the criteria is applicable, continue with the 50.59 Review.

☐ The proposed activity is editorial/typographical as defined in Section 5.2.2.1.

☐ The proposed activity represents an "FSAR-only" change as allowed in Section 5.2.2.2_____. (Insert item # from Section 5.2.2.2).

If further 50.59 Review is required, check the applicable review(s): (Only the sections indicated must be included in the Review.)

☐	**SCREENING**	**Sections I, II, III, and IV required**
☐	**50.59 EVALUATION EXEMPTION**	**Sections I, II, III, IV, and V required**
■	**50.59 EVALUATION (#: 04-004)**	**Sections I, II, III, IV, and VI required**

Preparer: Charles DeDeaux by RLW 7/27/04 (per telecom with R. Williams 7/27/04 at 10:15am)/Licensing /7/27/04
Name (print) / Signature / Company / Department / Date

Reviewer: Ronald Williams / [signature] Licensing / 7/27/04
Name (print) / Signature / Company / Department / Date

OSRC: K. Peters K Peters 7/28/04
Chairman's Name (print) / Signature / Date
[Required only for Programmatic Exclusion Screenings (see Section 5.8) and 50.59 Evaluations.]

List of Assisting/Contributing Personnel:

Name:	Scope of Assistance:

II. SCREENING

A. Licensing Basis Document Review

1. Does the proposed activity impact the facility or a procedure as described in any of the following Licensing Basis Documents?

Operating License	YES	NO	CHANGE # and/or SECTIONS IMPACTED
Operating License	☐	■	
TS	☐	■	
NRC Orders	☐	■	
If "YES", obtain NRC approval prior to implementing the change by initiating an LBD change in accordance with NMM LI-113 (Reference 2.2.13). (See Section 5.1.13 for exceptions.)			

LBDs controlled under 50.59	YES	NO	CHANGE # (if applicable) and/or SECTIONS IMPACTED
FSAR	☐	■	
TS Bases	☐	■	
Technical Requirements Manual	■	☐	Proposing to add Section 3.0/4.0 and Bases, and revised Index, Introduction, Responsibility Matrix, 3.3.3.1, 3.3.3.2, 3.3.3.3, 3.3.3.4, 3.3.3.8.1, 3.3.3.9, 3.3.4, 3.3.5, 3.4.9, 3.6.4.1, 3.7.1.6.1, 3.7.1.7, 3.7.10.1, 3.7.10.2, 3.7.10.4, 3.7.10.5, 3.7.11, 3.7.13, 3.7.14, and 3.8.3.1, 3.9.12, 3.11.1.2, 3.11.1.3, 3.11.2.2, 3.11.2.3, 3.11.2.4, 3.11.3, 3.11.4, 3.12.1, 3.12.2, and 3.12.3.
Core Operating Limits Report	☐	■	
NRC Safety Evaluation Reports[1]	☐	■	
If "YES", perform an Exemption Review per Section V OR perform a 50.59 Evaluation per Section VI AND initiate an LBD change in accordance with NMM LI-113 (Reference 2.2.13).			

LBDs controlled under other regulations	YES	NO	CHANGE # (if applicable) and/or SECTIONS IMPACTED
Quality Assurance Program Manual[2]	☐	■	
Emergency Plan[2]	☐	■	
Fire Protection Program[3] (includes the Fire Hazards Analysis)	☐	■	
Offsite Dose Calculations Manual	☐	■	
If "YES", evaluate any changes in accordance with the appropriate regulation AND initiate an LBD change in accordance with NMM LI-113 (Reference 2.2.13).			

2. Does the proposed activity involve a test or experiment not described in the FSAR?
If "yes," perform an Exemption Review per Section V OR perform a 50.59 Evaluation per Section VI.

☐ Yes
■ No

3. Does the proposed activity potentially impact equipment, procedures, or facilities utilized for storing spent fuel at an Independent Spent Fuel Storage Installation?
(Check "N/A" if dry fuel storage is not applicable to the facility.)

☐ Yes
☐ No
■ N/A

[1] If "YES," see Section 5.1.4.
[2] If "YES," notify the responsible department and ensure a 50.54 Evaluation is performed. Attach the 50.54 Evaluation.
[3] If "YES," evaluate the change in accordance with the requirements of the facility's Operating License Condition.

If "yes," perform a 72.48 Review in accordance with NMM Procedure LI-112.
(See Sections 1.5 and 5.3.1.5 of the EOI 10CFR50.59 Review Program Guidelines.)

B. Basis

Provide a clear, concise basis for the answers given in the applicable sections above. Explain why the proposed activity does or does not impact the Operating License/Technical Specifications and/or the FSAR and why the proposed activity does or does not involve a new test or experiment not previously described in the FSAR. Adequate basis must be provided within the Screening such that a third-party reviewer can reach the same conclusions. Simply stating that the change does not affect TS or the FSAR is not an acceptable basis. See EOI 50.59 Guidelines Section 5.6.6 for guidance.)

This change does not affect the Operating License, Technical Specifications, or FSAR. This change only affects the TRM. This change (1) replaces the general applicability criteria that TS sections 3.0 and 4.0 apply to the TRM with a TRM LCO (3.0) and SR (4.0) Applicability Section; (2) deletes reference to the GMPO approval of CRs that justify continued plant operation; (3) reinserts exclusion statements to 3.0.3 and 3.0.4 in TRM specifications for fire protection (FP), radioactive effluents (Rad Eff), and radiological environmental monitoring (REMP); and (4) removes the hydrogen analyzer shutdown statement. The proposed section is similar to the LCO and SR Applicability Section that exists in TS. The proposed additions to the TRM affect only the Specifications within the TRM and are not applicable to any existing tests specified in the FSAR, nor do the proposed additions affect any System, Structure, or Component (SSC) as described in the FSAR or TS.

C. References

Discuss the methodology for performing the LBD search. State the location of relevant licensing document information and explain the scope of the review such as electronic search criteria used (e.g., key words) or the general extent of manual searches per Section 5.3.6.4 of LI-101. **NOTE: Ensure that electronic and manual searches are performed using controlled copies of documents. If you have any questions, contact your site Licensing department.**

LBDs/Documents reviewed via keyword search:	Keywords:
FSAR, Autonomy, LRS(LBDS50.59), CMS	3.0, 4.0, LCO, SR, 1.25, 25%, Shutdown, Hydrogen Analyzer

LBDs/Documents reviewed manually:

OP-100-014

As stated above, this change does not affect the Operating License, Technical Specifications, or FSAR

D. Is the validity of this Review dependent on any other change? (See Section 5.3.4 of the EOI 10CFR50.59 Program Review Guidelines.)

☐ **Yes**
■ **No**

If "Yes," list the required changes.

_____

_____

_____

_____

III. ENVIRONMENTAL SCREENING

If any of the following questions is answered "yes," an Environmental Review must be performed in accordance with NMM Procedure EV-115, "Environmental Evaluations," and attached to this 50.59 Review. Consider both routine and non-routine (emergency) discharges when answering these questions.

Will the proposed Change being evaluated:

	Yes	No	
1.	☐	■	Involve a land disturbance of previously disturbed land areas in excess of one acre (i.e., grading activities, construction of buildings, excavations, reforestation, creation or removal of ponds)?
2.	☐	■	Involve a land disturbance of undisturbed land areas (i.e., grading activities, construction, excavations, reforestation, creating, or removing ponds)?
3.	☐	■	Involve dredging activities in a lake, river, pond, or stream?
4.	☐	■	Increase the amount of thermal heat being discharged to the river or lake?
5.	☐	■	Increase the concentration or quantity of chemicals being discharged to the river, lake, or air?
6.	☐	■	Discharge any chemicals new or different from that previously discharged?
7.	☐	■	Change the design or operation of the intake or discharge structures?
8.	☐	■	Modify the design or operation of the cooling tower that will change water or air flow characteristics?
9.	☐	■	Modify the design or operation of the plant that will change the path of an existing water discharge or that will result in a new water discharge?
10.	☐	■	Modify existing stationary fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)?[1]
11.	☐	■	Involve the installation of stationary fuel burning equipment or use of portable fuel burning equipment (i.e., diesel fuel oil, butane, gasoline, propane, and kerosene)?[1]
12.	☐	■	Involve the installation or use of equipment that will result in an air emission discharge?
13	☐	■	Involve the installation or modification of a stationary or mobile tank?
14.	☐	■	Involve the use or storage of oils or chemicals that could be directly released into the environment?
15.	☐	■	Involve burial or placement of any solid wastes in the site area that may affect runoff, surface water, or groundwater?

[1] See NMM Procedure EV-117, "Air Emissions Management Program," for guidance in answering this question.

IV. SECURITY PLAN SCREENING

If any of the following questions is answered "yes," a Security Plan review must be performed by the Security Department to determine actual impact to the Plan and the need for a change to the Plan.

A. Could the proposed activity being evaluated:

	Yes	No	
1.	☐	■	Add, delete, modify, or otherwise affect Security department responsibilities (e.g., including fire brigade, fire watch, and confined space rescue operations)?
2.	☐	■	Result in a breach to any security barrier(s) (e.g., HVAC ductwork, fences, doors, walls, ceilings, floors, penetrations, and ballistic barriers)?
3.	☐	■	Cause materials or equipment to be placed or installed within the Security Isolation Zone?
4.	☐	■	Affect security lighting by adding or deleting lights, structures, buildings, or temporary facilities?
5.	☐	■	Modify or otherwise affect the intrusion detection systems (e.g., E-fields, microwave, fiber optics)?
6.	☐	■	Modify or otherwise affect the operation or field of view of the security cameras?
7.	☐	■	Modify or otherwise affect (block, move, or alter) installed access control equipment, intrusion detection equipment, or other security equipment?
8.	☐	■	Modify or otherwise affect primary or secondary power supplies to access control equipment, intrusion detection equipment, other security equipment, or to the Central Alarm Station or the Secondary Alarm Station?
9.	☐	■	Modify or otherwise affect the facility's security-related signage or land vehicle barriers, including access roadways?
10.	☐	■	Modify or otherwise affect the facility's telephone or security radio systems?

The Security Department answers the following questions if one of the questions was answered "yes".

B. Is the Security Plan actually impacted by the proposed activity? ☐ Yes ☐ No

C. Is a change to the Security Plan required? ☐ Yes Change # (optional) _____ ☐ No

_____

Name of Security Plan reviewer (print) / Signature / Date

V. 50.59 EVALUATION EXEMPTION

Enter this section only if a "yes" box was checked in Section II.A, above.

A. Check the applicable boxes below. If any of the boxes are checked, a 50.59 Evaluation is not required. If none of the boxes are checked, perform a 50.59 Evaluation in accordance with Section VI. Provide supporting documentation or references as appropriate.

☐ The proposed activity meets all of the following criteria regarding design function per Section 5.6.1.1:

The proposed activity does not adversely affect the design function of an SSC as described in the FSAR; **AND**

The proposed activity does not adversely affect a method of performing or controlling a design function of an SSC as described in the FSAR; **AND**

The proposed activity does not adversely affect a method of evaluation that demonstrates intended design function(s) of an SSC described in the FSAR will be accomplished.

☐ An approved, valid 50.59 Review(s) covering associated aspects of the proposed activity already exists per Section 5.6.1.2. Reference 50.59 Evaluation # _____ (if applicable) or attach documentation. Verify the previous 50.59 Review remains valid.

☐ The NRC has approved the proposed activity or portions thereof per Section 5.6.1.3. Reference: _____

☐ The proposed activity is controlled by another regulation per Section 5.6.1.4.

B. Basis

Provide a clear, concise basis for determining the proposed activity may be exempted such that a third-party reviewer can reach the same conclusions. See Section 5.6.6 of the EOI 10CFR50.59 Review Program Guidelines for guidance.

Not Applicable. A full evaluation is being performed. See Section VI.

VI. 50.59 EVALUATION

A. **Executive Summary** (Serves as input to NRC summary report. Limit to one page or less. Send an electronic copy to the site licensing department after OSRC approval, if available.)

Brief description of change, test, or experiment:

The following administrative and editorial changes are proposed to the TRM.

(1)The major proposed administrative change is to replace the applicability of Technical Specification (TS) 3.0 and 4.0 to the Technical Requirements Manual (TRM), with a TRM Applicability Section (TRM 3.0/4.0 Section).

(2) This administrative change will also replace the requirement in TRM Actions for TRM 3.7.13 (Switchgear Area Ventilation System), TRM 3.7.14.b (Essential Instrument Air), and TRM 3.8.3.1.a (Onsite Power Distribution Systems) to initiate a Condition Report (CR) and perform a GMPO approved evaluation to justify continued operation with a requirement to enter TRM LCO 3.0.3. TRM LCO 3.0.3 will require communication with the GMPO or designee, the initiation of a CR to document the condition, and the determination of any limitations for continued plant operation.

(3) The editorial changes proposed will affect several TRM Specifications, the Index, and the Responsibility Matrix to ensure congruity with the added TRM 3.0/4.0 Sections. These editorial changes include reinsertion of exclusion statements to 3.0.3 and 3.0.4 in TRM specification for: fire protection (FP) 3.7.10.1, 3.7.10.2, 3.7.10.4, 3.7.10.5 and 3.7.11; radioactive effluents (Rad Eff) 3.11.1.2, 3.11.1.3, 3.1.2.2, 3.11.2.3, 3.11.2.4, 3.11.3, 3.11.4; and radiological environmental monitoring (REMP) 3.12.1, 3.12.2 and 3.12.3 previously approved as part of the plant TS prior to their relocation to other licensee documents. TS Amendments 50 for FP (2/1989) and 68 for Rad Eff/REMP (4/1991) relocated the operational conditions, remedial actions, and test requirements to the Fire Protection Program UNT 005-013 and the Offsite Dose Calculation Manual (ODCM) UNT 005-014, respectively. In 1995, these requirements were extracted from the above administrative documents and placed into the TRM. The fire protection requirements were removed from the administrative document and relocated to the TRM. The Radioactive Effluent and REMP requirements resided in both the administrative documents and the TRM, eventually being deleted from the administrative documents in the late 1990s. The TS 3.0.3 and 3.0.4 non-applicability statements that were contained in the TS for the FP and Rad Eff/REMP were omitted when relocated to the TRM from the various administrative documents. The remaining editorial changes are associated with ensuring congruity with the added TRM 3.0/4.0 applicability section.

(4) This change also proposes to replace the shutdown statement from the Hydrogen Analyzer Specification with a requirement to enter TRM LCO 3.0.3.

(5) The deletion of TS 3.0.3 from the TRM essentially removes the shutdown requirements from the TRM when the ACTION requirements cannot be completed or the allowed outage time to complete the ACTION cannot be met, or there is no action for the condition specified. The following LCOs will be affected by the deletion of the shutdown requirements, but will not require changes to the LCO or ACTION requirements. The impact of this change on these affected LCOs will be addressed in this evaluation: (a) LCO 3.3.4, turbine overspeed protection, (b) LCO 3.4.9, Structural Integrity, (c) LCO 3.6.1.5, Containment Average Temperature, (d) All the fire protection TRMs, (e) LCO 3.11.3, Solid Radioactive Waste, and (f) LCO 3.6.4.1, Hydrogen Analyzer.

Reason for proposed Change:

Technical Specification Sections 3.0 and 4.0 should not be applicable to the TRM. The TRM is a Licensee Controlled Document. Applicability to these requirements can cause unnecessary plant shutdowns due to TS 3.0.3 being applicable to the TRM. A plant shutdown will cause a transient

to the plant. Shutdown requirements needed for individual TRM LCOs will be contained in those LCOs. This change will also replace the requirement in several TRM Actions to initiate a Condition Report (CR) for performance of a General Manager-Plant Operations (GMPO) approved evaluation to justify continued operation with a requirement to enter TRM LCO 3.0.3. TRM LCO 3.0.3 will require communication of the condition to the GMPO or his designee (e.g. duty plant manager) as soon as practicable, but no later than 7 hours; and the initiation of a CR to document the condition, and a determination to identify any limitations for continued operation. Further actions shall be as required by the CR disposition and as deemed necessary by plant management. These actions ensure consistent evaluation of the condition when the TRM Actions cannot be met or when the allowed outage time has expired. Editorial changes to other TRM Specifications, the Index, and the Responsibility Matrix will be made to ensure consistent application of TRM requirements. Deleting the shutdown requirement from the hydrogen analyzer TRM is consistent with the SER for TS Amendment 192 which approved removal of the hydrogen analyzer from TS because they perform a non-safety related monitoring function.

50.59 Evaluation summary and conclusions

The proposed changes do not:

(1) Result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the FSAR.

(2) Result in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component important to safety previously evaluated in the FSAR.

(3) Result in more than a minimal increase in the consequences of an accident previously evaluated in the FSAR.

(4) Result in more than a minimal increase in the consequences of a malfunction of a structure, system, or component important to safety previously evaluated in the FSAR.

(5) Create a possibility for an accident of a different type than any previously evaluated in the FSAR.

(6) Create a possibility for a malfunction of a structure, system, or component important to safety with a different result than any previously evaluated in the FSAR.

(7) Result in a design basis limit for a fission product barrier as described in the FSAR being exceeded or altered.

(8) Result in a departure from a method of evaluation described in the FSAR used in establishing the design bases or in the safety analyses.

These conclusions are based on the fact that the changes being made are deleting the general applicability criteria that TS Sections 3.0 and 4.0 apply to the TRM and adding the TRM applicability sections to the TRM with major changes to ACTIONs that occur following the inoperability when the ACTIONs cannot be completed within the allowed outage time or when no ACTIONs exist for the condition identified. These changes have no effect on operation or procedures which govern the operation of the SSCs. The editorial changes by definition have no affect on the operation of the SSCs that could affect their operation as described in the FSAR. The removal of the shutdown statement from the hydrogen analyzer specification is acceptable because the hydrogen analyzer performs a non-safety monitoring function as specified in the SER for TS Amendment 192.

B. License Amendment Determination

Does the proposed Change being evaluated represent a change to a method of evaluation ONLY? If "Yes," Questions 1 – 7 are not applicable; answer only Question 8. If "No," answer all questions below. ☐ Yes ■ No

Does the proposed Change:

1. Result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the FSAR? ☐ Yes ■ No

BASIS: The major proposed administrative change is to replace the applicability of Technical Specification (TS) 3.0 and 4.0 to the Technical Requirements Manual (TRM) with a TRM Applicability Section (TRM 3.0/4.0 Section. The administrative requirement to initiate a CR, justify continued operation, and obtain GMPO approval in some TRM Actions will be replaced with a requirement to enter TRM LCO 3.0.3, which requires communication with the GMPO or designee, the initiation of a CR to document the condition, and the determination of any limitations for continued plant operation. Also, reference to TRM LCO 3.0.3 will replace the shutdown statement in the Hydrogen Analyzer Specification. Other editorial changes will be made to other TRM Specifications, the Index, and the Responsibility Matrix to ensure congruity with the added TRM 3.0/4.0 Sections.

The deletion of the applicability of TS 3.0 and 4.0 to the TRM essentially removes the shutdown requirements from the TRM when the ACTION requirements cannot be completed or the allowed outage time to complete the ACTION cannot be met. The changes remove the shutdown requirements because TS 3.0.3 is currently required to be entered when the TRM Actions cannot be met or cannot be completed within the allowed outage time, or there is no action for the condition specified. The shutdown requirement is being replaced by a requirement to communicate the plant condition to the GMPO or designee, initiate a condition report to document the condition, and determine any limitation for continued operation of the plant. This is justified because the TRM requirements associated with the SSCs do not meet the criteria specified in 10 CFR 50.36 and the loss of these SSCs are not assumed to initiate an accident nor are relied upon in the FSAR to mitigate an accident. This proposed change does not impact any accidents currently described in the FSAR.

This change could affect most of the TRMs; however some TRM Specifications require Actions other than what is contained in Tables or the submittal of special or routine annual reports that describe process deviations. The deletion of TS 3.0.3 from the TRM will affect the following LCOs, but will not require changes to the LCO or ACTION requirements: (a) LCO 3.3.4, turbine overspeed protection, (b) LCO 3.4.9, Structural Integrity, (c) LCO 3.6.1.5, Containment Average Temperature, (d) All the fire protection TRMs, (e) LCO 3.11.3, Solid Radioactive Waste, and (f) LCO 3.6.4.1, Hydrogen Analyzer.

(1) The deletion of the applicability to TS 3.0.3 from turbine overspeed protection requirements do not result in more than a minimal increase in the frequency of any accident evaluated in the SAR because loss of the main turbine or missiles resulting from such is not considered an accident initiator. The existing TRM Action statements that require turbine isolation from the steam supply will not be altered as a result of this change.

(2) The deletion of the applicability to TS 3.0.3 from the Structural Integrity specification does not result in more than a minimal increase in the frequency of any accident. The TRM requires the individual component to be isolated if its structural integrity cannot be restored. If the component is a TS related component (one that is required for accident mitigation or prevention), the associated TS Actions will be required to be entered.

(3) The deletion of the applicability to TS 3.0.3 from the containment average temperature TRM does not result in more than a minimal increase in the frequency of any accident evaluated in the FSAR

because the applicability for this TRM is MODE 1 when THERMAL POWER is greater than 70 percent RTP and the ACTIONS to restore containment average temperature within 8 hours or insert COLSS penalties within the next 6 hours will ensure Peak Clad Temperature of 2200 Deg F remains bounded by the FSAR analyses under LOCA conditions. Sufficient time is available under the new TRM 3.0.3 to take appropriate action to ensure safe plant operation. Deletion of TS 3.0.3 applicability to this LCO does not involve any accident initiators.

(4) The deletion of the applicability to TS 3.0.3 from the fire protection TRMs will not result in more than a minimal increase in the frequency of any accident evaluated in the SAR because the Fire protection instrumentation contain actions to establish compensatory measures and a condition report is adequate if the compensatory measures cannot be established. Fire protection is governed under 10 CFR 50 Appendix R. Also, the fire protection requirements contained exclusions to TS 3.0.3 and 3.0.4 when they were located in the TS. TS Amendments 50 for FP (2/1989) relocated the operational conditions, remedial actions, and test requirements to the Fire Protection Program UNT procedure 005-013. In 1995, these requirements were extracted from the above administrative documents and placed into the TRM. The fire protection requirements were removed from the administrative document and relocated to the TRM. The TS 3.0.3 and 3.0.4 non-applicability statements that were contained in the TS and the administrative procedure were omitted when relocated to the TRM. The non-applicability of provisions of TRM LCO 3.0.3 and 3.0.4 will be reinserted into the fire protection TRM LCOs.

(5) The deletion of the applicability to TS 3.0.3 from the solid radioactive waste TRM 3.11.3 will not result in more than a minimal increase in the frequency of any accident evaluated in the SAR *because this TRM contain appropriate actions to suspend shipment and correct the problems* identified. Radioactive waste processing is governed by the Process Control Program via NMM RW-105. Also, the solid radioactive waste requirements contained exclusions to TS 3.0.3 and 3.0.4 when they were located in the TS. TS Amendments 68 for Rad Eff/REMP (4/1991) relocated the operational conditions, remedial actions, and test requirements to the Offsite Dose Calculation Manual (ODCM) and Process Control Program (PCP). In 1995, the requirements were extracted from the above administrative documents and placed into the TRM. The requirements applicable to the solid radioactive waste resided at the time in both the PCP and the TRM. The TS 3.0.3 and 3.0.4 non-applicability statements that were contained in the TS were omitted when eventually placed in the TRM.

(6) The deletion of the shutdown requirement from the Hydrogen Analyzer Specification with a requirement to enter TRM LCO 3.0.3 will not affect the frequency of the occurrence of any accident. The SER for TS Amendment 192 dated March 9, 2004 allowed the hydrogen analyzer specification to be relocated from the TS to the TRM. The hydrogen analyzers are no longer needed to mitigate design basis accidents based on the elimination of the design-basis LOCA hydrogen release. The hydrogen analyzers are not a primary means of indicating a significant abnormal degradation of the reactor coolant pressure boundary nor are they risk-significant. Therefore, the shutdown requirement was removed from the hydrogen analyzers when the Actions cannot be completed within the allowed outage time and replaced with a requirement to enter TS 3.0.3, which requires a condition report to be initiated and limitations on continued operation to be determined

The majority of the other changes are editorial with exception of the administrative change to the GMPO approval to justify continued plant operation for specific TRM LCOs. The requirement for the GMPO to approve the justification for continued operation will not affect the frequency of an accident or *the capability to mitigate any Accident described in the FSAR. This requirement will be replaced with a* notification of the plant condition to the GMPO or designee as soon as practicable but no later than 7 hours. This requirement will ensure plant management oversight and an appropriate level of conservative decision making being applied in a timely manner. Review requirements for plant operations and approval of these requirements are specified in licensee controlled documents. These editorial and administrative changes will also not result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the FSAR.

Therefore, this proposed change will not result in more than a minimal increase in the frequency of occurrence of an accident previously evaluated in the FSAR.

2. Result in more than a minimal increase in the likelihood of occurrence of a malfunction of a structure, system, or component important to safety previously evaluated in the FSAR? ☐ Yes ■ No

BASIS: The major proposed administrative change is to replace the applicability of Technical Specification (TS) 3.0 and 4.0 to the Technical Requirements Manual (TRM) with a TRM Applicability Section (TRM 3.0/4.0 Section. The administrative requirement to initiate a CR, justify continued operation, and obtain GMPO approval in some TRM Actions will be replaced with a requirement to enter TRM LCO 3.0.3. which requires communication with the GMPO or designee; the initiation of a CR to document the condition, and the determination of any limitations for continued plant operation. Also, reference to TRM LCO 3.0.3 will replace the shutdown statement in the Hydrogen Analyzer Specification. Other editorial changes will be made to other TRM Specifications, the Index, and the Responsibility Matrix to ensure congruity with the added TRM 3.0/4.0 Sections.

The deletion of the applicability to TS 3.0.3 from turbine overspeed protection requirements do not result in more than a minimal increase in the likelihood of occurrence of a malfunction of a SSC important to safety because the existing TRM Action statements that require turbine isolation from the steam supply will not be altered as a result of this change.

The deletion of the applicability to TS 3.0.3 from the Structural Integrity specification does not result in more than a minimal increase in the likelihood of occurrence of a malfunction of a SSC important to safety. The TRM requires the individual component to be isolated if its structural integrity cannot be restored. If the component is a TS related component (one that is required for accident mitigation or prevention), the associated TS Actions will be required to be entered.

The removal of shutdown statements via reference to TS 3.0.3 and the deletion of the shutdown requirements from the Hydrogen Analyzer Specification do not result in an increase in the likelihood of an SSC malfunction. The TRM-related SSC is already lost or degraded before TS 3.0.3 is entered. The action taken as a result of such loss does not prevent the initial loss or degradation of the associated SSC either presently or following implementation of this proposed change.

The deletion of the applicability to TS 3.0.3 from the containment average temperature TRM does not result in an increase in the likelihood of an SSC malfunction because the applicability for this TRM is MODE 1 when THERMAL POWER is greater than 70 percent RTP and the ACTIONS to restore containment average temperature within 8 hours or insert COLSS penalties within the next 6 hours will ensure Peak Clad Temperature of 2200 Deg F remains bounded by the FSAR analyses under LOCA conditions. Sufficient time is available under the new TRM 3.0.3 to take appropriate action to ensure safe plant operation.

The other changes are editorial and cannot by the definition of editorial changes affect the likelihood of occurrence of a malfunction to a SCC. The editorial changes include insertion of the exclusion to TRM 3.0.3 and 3.0.4 to the fire protection, radioactive effluent, and radiological environmental monitoring specifications that were not reinserted into specifications when moved from the administrative documents to the TRM. The removal of the requirement for the GMPO to approve the justification for continued operation is considered administrative because the approval process does not affect any SSC, it is an administrative process governed by existing plant process requirements. These changes are being made to provide consistency to the TRM based on the addition of TRM section 3.0 and 4.0.

Therefore the proposed changes will not result in more than a minimal increase in the likelihood of

occurrence of a malfunction of s SCC important to safety.

3. Result in more than a minimal increase in the consequences of an accident previously evaluated in the FSAR? ☐ Yes ■ No

BASIS: The major proposed administrative change is to replace the applicability of Technical Specification (TS) 3.0 and 4.0 to the Technical Requirements Manual (TRM) with a TRM Applicability Section (TRM 3.0/4.0 Section). The administrative requirement to initiate a CR, justify continued operation, and obtain GMPO approval in some TRM Actions will be replaced with a requirement to enter TRM LCO 3.0.3, which requires communication with the GMPO or designee, the initiation of a CR to document the condition, and the determination of any limitations for continued plant operation. Also, reference to TRM LCO 3.0.3 will replace the shutdown statement in the Hydrogen Analyzer Specification. Other editorial changes will be made to other TRM Specifications, the Index, and the Responsibility Matrix to ensure congruity with the added TRM 3.0/4.0 Sections.

The deletion of the applicability to TS 3.0.3 from the containment average temperature TRM does not affect the consequences of an accident because the applicability for this TRM is MODE 1 when THERMAL POWER is greater than 70 percent RTP and the ACTIONS to restore containment average temperature within 8 hours or insert COLSS penalties within the next 6 hours will ensure Peak Clad Temperature of 2200 Deg F remains bounded by the FSAR analyses under LOCA conditions. Sufficient time is available under the new TRM 3.0.3 to take appropriate action to ensure safe plant operation within the bounds of the applicable FSAR analyses.

The deletion of the applicability to TS 3.0.3 from turbine overspeed protection requirements do not affect the consequences of an accident because the existing TRM Action statements that require turbine isolation from the steam supply will not be altered as a result of this change.

The deletion of the applicability to TS 3.0.3 from the Structural Integrity specification does not affect the consequences of an accident. The TRM requires the individual component to be isolated if its structural integrity cannot be restored. If the component is a TS related component (one that is required for accident mitigation or prevention), the associated TS Actions will be required to be entered.

The deletion of the applicability to TS 3.0.3 and the shutdown requirement from the Hydrogen Analyzer Specification provides overall guidance to the TRM user regarding the individual technical requirements contained therein. These new requirements differ from the TSs, however, in that shutdown statements do not exist. A shutdown action statement does not determine the capability for meeting a safety function or change any associated performance characteristics. The addition of these sections and the removal of shutdown statements will require certain plant configurations to be evaluated against continued plant operation. TRM related SSCs do not meet the criteria of 10 CFR 50.36 and the loss of these SSCs is not assumed to initiate an accident nor is relied upon in the FSAR to mitigate an accident. Additionally, the hydrogen analyzers are no longer required to mitigate design basis accidents as specified in the SER for TS Amendment 192 dated March 9, 2004. Therefore, this change does not result in an increase in the consequences of an accident described in the FSAR.

The other changes are editorial and cannot by the definition of editorial changes affect the consequences of an accident. The editorial changes include insertion of the exclusion to TRM 3.0.3 and 3.0.4 to the fire protection, radioactive effluent, and radiological environmental monitoring specifications that were not reinserted into specifications when moved from the administrative documents to the TRM. The removal of the requirement for the GMPO to approve the justification for continued operation is considered administrative because the approval process does not affect any SSC, it is an administrative process governed by existing plant process requirements. These changes are being made to provide consistency to the TRM based on the addition of TRM section 3.0 and 4.0.

Therefore, the proposed changes will not result in more than a minimal increase in the consequences of an accident previously evaluated in the FSAR.

4. Result in more than a minimal increase in the consequences of a malfunction of a structure, system, or component important to safety previously evaluated in the FSAR? ☐ **Yes** ■ **No**

BASIS: The major proposed administrative change is to replace the applicability of Technical Specification (TS) 3.0 and 4.0 to the Technical Requirements Manual (TRM) with a TRM Applicability Section (TRM 3.0/4.0 Section). The administrative requirement to initiate a CR, justify continued operation, and obtain GMPO approval in some TRM Actions will be replaced with a requirement to enter TRM LCO 3.0.3, which requires communication with the GMPO or designee, the initiation of a CR to document the condition, and the determination of any limitations for continued plant operation. Also, reference to TRM LCO 3.0.3 will replace the shutdown statement in the Hydrogen Analyzer Specification. Other editorial changes will be made to other TRM Specifications, the Index, and the Responsibility Matrix to ensure congruity with the added TRM 3.0/4.0 Sections.

The deletion of the applicability to TS 3.0.3 from the containment average temperature TRM does not result in more than a minimal increase in the consequences of a malfunction of a SSC important to safety because the applicability for this TRM is MODE 1 when THERMAL POWER is greater than 70 percent RTP and the ACTIONS to restore containment average temperature within 8 hours or insert COLSS penalties within the next 6 hours will ensure Peak Clad Temperature of 2200 Deg F remains bounded by the FSAR analyses under LOCA conditions. The assumptions utilized in the FSAR evaluated malfunctions are a collection of bounding worst case conditions that typically don't exist concurrently. Sufficient time is available under the new TRM 3.0.3 to take appropriate action to ensure consequences resulting from a malfunction remain bounded by the applicable FSAR analyses and continue safe plant operation.

The deletion of the applicability to TS 3.0.3 from turbine overspeed protection requirements does not result in more than a minimal increase in the consequences of a malfunction of a SSC important to safety because the existing TRM Action statements that require turbine isolation from the steam supply will not be altered as a result of this change.

The deletion of the applicability to TS 3.0.3 from the Structural Integrity specification does not result in more than a minimal increase in the consequences of a malfunction of a SSC important to safety. The TRM requires the individual component to be isolated if its structural integrity cannot be restored. If the component is a TS related component (one that is required for accident mitigation or prevention), the associated TS Actions will be required to be entered.

The proposed change to delete the applicability to TS 3.0.3 and the deletion of the shutdown requirements from the Hydrogen Analyzer Specification affect the requirements when the Actions cannot be completed within the allowed outage time or when there is no Action for the condition by eliminating a required shutdown. No change to the design or function of any SSC is proposed. Therefore, no possibility of any new malfunction of an SSC described in the SAR is created. Subsequently, the dose consequences of any malfunction or accident previously evaluated in the SAR is not altered by the proposed changes.

The other changes are editorial and cannot by the definition of editorial changes does not result in more than a minimal increase in the consequences of a malfunction of a SSC important to safety. The editorial changes include insertion of the exclusion to TRM 3.0.3 and 3.0.4 to the fire protection, radioactive effluent, and radiological environmental monitoring specifications that were not reinserted into specifications when moved from the administrative documents to the TRM. The removal of the

requirement for the GMPO to approve the justification for continued operation is considered administrative because the approval process does not affect any SSC, it is an administrative process governed by existing plant process requirements. These changes are being made to provide consistency to the TRM based on the addition of TRM section 3.0 and 4.0.

Therefore, the proposed changes will not result in more than a minimal increase in the consequences of a malfunction of a structure, system, or component important to safety previously evaluated in the FSAR.

5. Create a possibility for an accident of a different type than any previously evaluated in the FSAR? ☐ Yes ■ No

BASIS: The major proposed administrative change is to replace the applicability of Technical Specification (TS) 3.0 and 4.0 to the Technical Requirements Manual (TRM) with a TRM Applicability Section (TRM 3.0/4.0 Section. The administrative requirement to initiate a CR, justify continued operation, and obtain GMPO approval in some TRM Actions will be replaced with a requirement to enter TRM LCO 3.0.3, which requires communication with the GMPO or designee; the initiation of a CR to document the condition, and the determination of any limitations for continued plant operation. Also, reference to TRM LCO 3.0.3 will replace the shutdown statement in the Hydrogen Analyzer Specification. Other editorial changes will be made to other TRM Specifications, the Index, and the Responsibility Matrix to ensure congruity with the added TRM 3.0/4.0 Sections.

The proposed changes do not create any physical change to the plant or plant SSCs. The proposed changes act to delete shutdown requirements (modify the Actions to be taken) when Actions cannot be met within the allowed outage time or when no Action exist for the condition identified. The modified actions associated with turbine overspeed protective device, Structural Integrity, Containment Average Temperature, Hydrogen Analyzer, or Fire Protection Equipment inoperability do not introduce a new accident type. The loss of the main turbine is currently evaluated in the FSAR, along with components that may be isolated via the Structural Integrity TRM that are located in the TS are governed by those requirements. The FSAR contains a separate analysis for Appendix R equipment. The Hydrogen Analyzer is no longer required for mitigation of accidents and is a non-safety related monitor.

The deletion of the applicability to TS 3.0.3 from the containment average temperature TRM does not create a possibility for an accident of a different type than any previously evaluated in the FSAR because the applicability for this TRM is MODE 1 when THERMAL POWER is greater than 70 percent RTP and the ACTIONS to restore containment average temperature within 8 hours or insert COLSS penalties within the next 6 hours will ensure Peak Clad Temperature of 2200 Deg F remains bounded by the FSAR analyses under LOCA conditions. Sufficient time is available under the new TRM 3.0.3 to take appropriate action to ensure continued plant operation remain bounded by the applicable FSAR analyses. This change does not involve any accident initiators. No change is administrative in nature and no hardware changes are made.

The other changes are editorial and cannot by the definition of editorial changes create the possibility for an accident of a different type than any previously evaluated. The editorial changes include insertion of the exclusion to TRM 3.0.3 and 3.0.4 to the fire protection, radioactive effluent, and radiological environmental monitoring specifications that were not reinserted into specifications when moved from the administrative documents to the TRM. The removal of the requirement for the GMPO to approve the justification for continued operation is considered administrative because the approval process does not affect any SSC, it is an administrative process governed by existing plant process requirements. These changes are being made to provide consistency to the TRM based on the addition of TRM section 3.0 and 4.0.

Therefore, the proposed changes will not create a possibility for an accident of a different type than

any previously evaluated in the FSAR.

6. Create a possibility for a malfunction of a structure, system, or component important to safety with a different result than any previously evaluated in the FSAR? ☐ Yes ■ No

BASIS: The major proposed administrative change is to replace the applicability of Technical Specification (TS) 3.0 and 4.0 to the Technical Requirements Manual (TRM) with a TRM Applicability Section (TRM 3.0/4.0 Section. The administrative requirement to initiate a CR, justify continued operation, and obtain GMPO approval in some TRM Actions will be replaced with a requirement to enter TRM LCO 3.0.3, which requires communication with the GMPO or designee; the initiation of a CR to document the condition, and the determination of any limitations for continued plant operation. Also, reference to TRM LCO 3.0.3 will replace the shutdown statement in the Hydrogen Analyzer Specification. Other editorial changes will be made to other TRM Specifications, the Index, and the Responsibility Matrix to ensure congruity with the added TRM 3.0/4.0 Sections.

The proposed administrative changes only affect the applicability of when specified equipment is required to be operable and in some cases, modify the actions to be taken when certain equipment is known to be inoperable. Appropriate controls will be maintained such that the plant will respond to any event within the bounds of the existing accident analyses associated with turbine overspeed protective device, Structural Integrity, Containment Average Temperature, Hydrogen Analyzer, or Fire Protection Equipment inoperability. No change to the design, operation, or function of any SSC is proposed. Therefore, no possibility of any new malfunction of an SSC described in the SAR is created and, subsequently, the evaluated results of any such malfunction described in the SAR are not affected.

The other changes are editorial and cannot by the definition of editorial changes create the possibility for a malfunction of a SSC important to safety with a different result than any previously evaluated. The editorial changes include insertion of the exclusion to TRM 3.0.3 and 3.0.4 to the fire protection, radioactive effluent, and radiological environmental monitoring specifications that were not reinserted into specifications when moved from the administrative documents to the TRM. The removal of the requirement for the GMPO to approve the justification for continued operation is considered administrative because the approval process does not affect any SSC, it is an administrative process governed by existing plant process requirements. These changes are being made to provide consistency to the TRM based on the addition of TRM section 3.0 and 4.0.

Therefore, the proposed changes do not create a possibility for a malfunction of a SSC important to safety with a different result than any previously evaluated in the FSAR.

7. Result in a design basis limit for a fission product barrier as described in the FSAR being exceeded or altered? ☐ YES ■ NO

BASIS: The major proposed administrative change is to replace the applicability of Technical Specification (TS) 3.0 and 4.0 to the Technical Requirements Manual (TRM) with a TRM Applicability Section (TRM 3.0/4.0 Section. The administrative requirement to initiate a CR, justify continued operation, and obtain GMPO approval in some TRM Actions will be replaced with a requirement to enter TRM LCO 3.0.3, which requires communication with the GMPO or designee; the initiation of a CR to document the condition, and the determination of any limitations for continued plant operation. Also, reference to TRM LCO 3.0.3 will replace the shutdown statement in the Hydrogen Analyzer Specification. Other editorial changes will be made to other TRM Specifications, the Index, and the Responsibility Matrix to ensure congruity with the added TRM 3.0/4.0 Sections.

The proposed administrative changes to deleted shutdown requirements, when the Actions cannot be completed within the allowed outage time, or if there are no Actions for the condition identified, do not impact the fuel clad, RCS pressure boundary, or the containment. The modified actions associated with turbine overspeed protective device, Structural Integrity, Containment Average Temperature, or Hydrogen Analyzer inoperability do not result in a design basis limit for a fission product barrier as described in the FSAR being exceeded or altered.

The loss of the main turbine is currently evaluated in the FSAR and the effects of not maintaining a minimum containment temperature, along with components that may be isolated via the Structural Integrity TRM that are located in the TS are governed by those requirements.

The deletion of the applicability to TS 3.0.3 from the containment average temperature TRM does not result in a design basis limit for a fission product barrier as described in the FSAR being exceeded or altered because the applicability for this TRM is MODE 1 when THERMAL POWER is greater than 70 percent RTP and the ACTIONS to restore containment average temperature within 8 hours or insert COLSS penalties within the next 6 hours will ensure Peak Clad Temperature of 2200 Deg F remains bounded by the FSAR analyses under LOCA conditions. Sufficient time is available under the new TRM 3.0.3 to take appropriate action to ensure continued plant operation remain bounded by the applicable FSAR analyses. The containment air temperature does impact Peak Clad Temperature (PCT) which is directly associated with fuel rod integrity. The administrative ACTION to insert COLSS penalties will limit thermal power and ensure that PCT remains bounded by the FSAR analyses as well as ensure that the design basis limit for this fission product barrier is not exceeded or altered. With regard to the containment function, a lower containment initial temperature will result in lower peak containment pressure; therefore, operating with a reduced containment temperature will have no adverse effect on the containment pressure design basis limit.

The Hydrogen Analyzer is no longer required for mitigation of accidents and is a non-safety related monitor. Therefore, no design basis limits associated with fission product barriers are affected.

The other changes are editorial and cannot by the definition of editorial changes result in a design basis limit for a fission product barrier as described in the FSAR being exceeded or altered. The editorial changes include insertion of the exclusion to TRM 3.0.3 and 3.0.4 to the fire protection, radioactive effluent, and radiological environmental monitoring specifications that were not reinserted into specifications when moved from the administrative documents to the TRM. The removal of the requirement for the GMPO to approve the justification for continued operation is considered administrative because the approval process does not affect any SSC, it is an administrative process governed by existing plant process requirements. These changes are being made to provide consistency to the TRM based on the addition of TRM section 3.0 and 4.0.

Therefore the proposed changes do not result in exceeding or altering a design basis limit for a fission product barrier as described in the FSAR.

8. Result in a departure from a method of evaluation described in the FSAR used in establishing the design bases or in the safety analyses? ☐ Yes ■ No

BASIS: The major proposed administrative change is to replace the applicability of Technical Specification (TS) 3.0 and 4.0 to the Technical Requirements Manual (TRM) with a TRM Applicability Section (TRM 3.0/4.0 Section. The administrative requirement to initiate a CR, justify continued operation, and obtain GMPO approval in some TRM Actions will be replaced with a requirement to enter TRM LCO 3.0.3, which requires communication with the GMPO or designee; the initiation of a CR to document the condition, and the determination of any limitations for continued plant operation.

Also, reference to TRM LCO 3.0.3 will replace the shutdown statement in the Hydrogen Analyzer Specification. Other editorial changes will be made to other TRM Specifications, the Index, and the Responsibility Matrix to ensure congruity with the added TRM 3.0/4.0 Sections.

None of the aforementioned administrative changes correspond to or affect any method of evaluation described within or without the FSAR. The proposed changes eliminate applicability to TS 3.0.3 when actions cannot be completed or no Actions exist for the condition identified. No change to any input parameter for dose assessment or design basis methodologies has resulted due to any of the proposed changes. These changes only affect the Actions to be taken following failure of the SSC.

Additionally, the deletion of the shutdown requirement from the hydrogen analyzer Specification with a requirement to enter TRM LCO 3.0.3 will not affect the safety analysis or design basis requirements described in the FSAR. The SER for TS Amendment 192 dated March 9, 2004 specified the hydrogen analyzers are no longer needed to mitigate design basis accidents based on the elimination of the design-basis LOCA hydrogen release. The hydrogen analyzers are not a primary means of indicating a significant abnormal degradation of the reactor coolant pressure boundary nor are they risk-significant.

The other changes are editorial and cannot by the definition of editorial changes result in a departure from a method of evaluation described in the FSAR used in establishing the design basis or in the safety analysis. The editorial changes include insertion of the exclusion to TRM 3.0.3 and 3.0.4 to the fire protection, radioactive effluent, and radiological environmental monitoring specifications that were not reinserted into specifications when moved from the administrative documents to the TRM. The removal of the requirement for the GMPO to approve the justification for continued operation is considered administrative because the approval process does not affect any SSC, it is an administrative process governed by existing plant process requirements. These changes are being made to provide consistency to the TRM based on the addition of TRM section 3.0 and 4.0.

Therefore the proposed changes do not result in a departure from a method of evaluation described in the FSAR used in establishing the design bases or in the safety analysis.