



Entergy Nuclear Northeast
Indian Point Energy Center
450 Broadway, GSB
P.O. Box 249
Buchanan, NY 10511-0249
Tel 914 734 6700

Fred Dacimo
Site Vice President
Administration

September 25, 2006

Re: Indian Point Units 2 and 3
Dockets 50-247 and 50-286

NL-06-099

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

**SUBJECT: Proposed Changes to Indian Point 2 and 3 Technical Specifications:
Miscellaneous Editorial Changes, Including TSTF-485**

Dear Sir:

Pursuant to 10 CFR 50.90, Entergy Nuclear Operations, Inc, (Entergy) hereby requests an amendment to the Operating Licenses for Indian Point Nuclear Generating Units 2 (IP2) and 3 (IP3). The proposed editorial changes consist of:

- Typographical corrections,
- Update of references, and
- Deletion of obsolete notes.

Specific changes in these three categories are described in Attachment One and markups of affected Technical Specification pages are provided in Attachment Two.

Entergy has evaluated the proposed change in accordance with 10 CFR 50.91 (a)(1) using the criteria of 10 CFR 50.92 (c) and Entergy has determined that this proposed change involves no significant hazards considerations, as described in Attachment One. The proposed changes to the Technical Specifications are shown in Attachment Two. A copy of this application and the associated attachments are being submitted to the designated New York State official.

A001

Entergy requests approval of the proposed amendment by July 2007. There are no new commitments being made in this submittal. If you have any questions or require additional information, please contact Mr. Patric W. Conroy, IPEC Licensing Manager at (914) 734-6668.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 9/25/06.

Sincerely,



Fred R. Dacimo
Site Vice President
Indian Point Energy Center

Attachments:

- One: Analysis of Proposed Technical Specification Changes Regarding Miscellaneous Editorial Changes
- Two: Markup of Technical Specification Pages for Proposed Changes Regarding Miscellaneous Editorial Changes

cc: Mr. John P. Boska, Senior Project Manager, NRC NRR DORL
Mr. Samuel J. Collins, Regional Administrator, NRC Region 1
NRC Resident Inspector, IP2
NRC Resident Inspector, IP3
Mr. Peter R. Smith, President, NYSERDA
Mr. Paul Eddy, New York State Dept. of Public Service

ATTACHMENT ONE TO NL-06-099

**ANALYSIS OF PROPOSED
TECHNICAL SPECIFICATION CHANGES REGARDING
MISCELLANEOUS EDITORIAL CHANGES**

**ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNITS NO. 2 and 3
DOCKET NO. 50-247 and 50-286**

1.0 DESCRIPTION

This letter requests amendments to Operating License DPR-26, Docket No. 50-247 for Indian Point Nuclear Generating Unit No. 2 (IP2) and Operating License DPR-64, Docket No. 50-286 for Indian Point Nuclear Generating Unit No. 3 (IP3).

The proposed editorial changes consist of:

- Typographical corrections,
- Update of references, and
- Deletion of obsolete notes.

Specific changes are listed in Table One.

2.0 PROPOSED CHANGES

The proposed changes are itemized in Table One. Refer to Attachment Two, Technical Specification markup pages, for the specific wording for the proposed changes. There are no Technical Specification Bases changes associated with this license amendment request.

3.0 BACKGROUND

A. Typographical Corrections

- Item 1; SR Example 1.4-1 per TSTF 485

TSTF 485 identifies a correction to Standard Technical Specification Section 1.4, Example 1.4-1 to be consistent with a change to SR 3.0.4 previously made via TSTF 359. IP2 adopted TSTF 359 during the conversion to ITS (Amendment 238; November 3, 2003) and IP3 adopted TSTF 359 in License Amendment 226; April 6, 2005. Therefore the correction identified in TSTF 485 is applicable to IP2 and IP3.

- Item 2; RPS Overtemperature ΔT Function

Standard Technical Specification (NUREG 1431) Revision 3 incorporated the correction of an error introduced in TSTF-339 regarding the signs on certain terms in the expression for $f_1(\Delta I)$ used in the Overtemperature ΔT description in Note 1 of Table 3.3.1-1. TSTF-339 was included in the conversion to ITS for IP2 (Amendment 238) and was adopted by IP3 in License Amendment 225 issued 3/24/2005. Therefore the correction provided in Revision 3 of NUREG 1431 is applicable to IP2 and IP3.

In addition, Revision 1 of NUREG 1431 contained an error in the sign used for the P' term used in the Overtemperature ΔT description. The inequality ' \leq ' shown in Revision 1 of NUREG 1431 was

TABLE ONE
DESCRIPTION OF PROPOSED TECHNICAL SPECIFICATION CHANGES

ITEM	DESCRIPTION	TS PAGES	
		IP2	IP3
A: Typographical Corrections			
1	Correction to SR Example 1.4-1 per TSTF 485.	1.4-3	1.4-2
2	Correction of sign applied to certain parameters in the expression for Overtemperature ΔT .	3.3.1-16	3.3.1-19
3	Correction of sign applied to tau parameter used in the expression for Overpower ΔT .	3.3.1-17	3.3.1-20
4	Correction of units used in Table 3.3.7-1	3.3.7-3	N/A
B: Reference Updates			
5	Update reference specified for 5.3.1.b, Unit Staff Qualifications.	5.3-1	5.0-5
6	Update reference specified for 5.4.1.a, Procedures.	N/A	5.0-6
C: Deletion of Obsolete Notes			
7	Delete one-time note regarding tracer gas testing.	N/A	3.7.11-1
8	Delete SR 3.8.7.1 note regarding frequency verification for inverter 34.	N/A	3.8.7-3
9	Delete one-time note regarding ILRT test interval	5.5-14	5.0-30
10	Delete note regarding charcoal bed depth for control room ventilation system	N/A	5.0-24

corrected to ' \geq ' in Revision 2. The IP3 conversion to ITS was based on Revision 1 of NUREG 1431 and therefore this correction is applicable to IP3. The IP2 conversion to ITS was based on Revision 2 of NUREG 1431 and therefore this correction is not required for IP2. Parameters are appropriately specified in plant documents such that actual implemented field settings are correct and field setting changes will not be required as a result of this license amendment request.

- Item 3; RPS Overpower ΔT Function

The expression for Overpower ΔT in NUREG 1431 (Note 2 of Table 3.3.1-1) includes the parameters τ_1 , τ_2 , τ_3 , τ_6 , and τ_7 . The expression applicable to IP2 and IP3 is a simplified version that only requires the parameter τ_7 to be retained, which is renumbered as τ_3 for the IP2 and IP3 ITS. The NUREG 1431 markup for this page was incorrectly made for this change for the IP2 and IP3 ITS conversions, so that the wrong inequality sign was applied in the IP2 / IP3 expressions. The inequality sign for the τ_3 parameter used in the IP2 / IP3 expressions should be ' \geq ' not ' \leq '. Parameters are appropriately specified in plant documents such that actual implemented field settings are correct and field setting changes will not be required as a result of this license amendment request.

- Item 4; Table 3.3.7-1 Instrumentation Units

IP2 Technical Specification Section 3.3.7, Table 3.3.7-1 incorrectly identifies the units for the CRVS actuation instrumentation allowable values as 'mr'. The correct units are 'mr / hr' as shown in Table 3.3.7-1 of NUREG 1431.

B. Reference Updates

- Item 5; Unit Staff Qualifications

IP2 and IP3 ITS Sections 5.3.1.b specify ANSI N18.1-1971. The latest version of the Quality Assurance Program Manual (QAPM) (Entergy letter CNRO-2006-00029 to NRC dated May 15, 2006) specifies ANSI / ANS 3.1 – 1978. Therefore IP2 / IP3 Sections 5.3.1.b are being updated to reflect the latest version of the QAPM.

- Item 6; Procedures

Revision 0 of Regulatory Guide (RG) 1.33 is specified in IP3 ITS section 5.4.1.a. The NRC approved QAPM applicable to IP2 and IP3 invokes Revision 2 of RG 1.33. Therefore this reference in IP3 5.4.1.a is being updated to be consistent with the QAPM. IP2 ITS section 5.4.1.a currently specifies Revision 2 of RG 1.33.

C. Deletion of Obsolete Notes

- Item 7; Delete one-time note regarding Tracer Gas Testing

IP3 License Amendment 223 issued January 19, 2005 applied a one-time Note to Conditions A and B of LCO 3.7.11 (Control Room Ventilation System) to support the initial tracer gas testing of the IP3 Control Room Envelope. Tracer gas testing was successfully performed in February 2005 (Entergy letter NL-05-085 to NRC dated June 28, 2005) and this one-time note can be deleted. Amendment 223 also provided for a Bases change regarding the use of SCBA and KI pills as a compensatory measure in the event that the tracer gas testing identified unfiltered inleakage in excess of established limits. This allowance has also expired and Entergy has revised the Bases to remove this allowance, as committed in the request for amendment.

- Item 8; Delete SR 3.8.7.1 note regarding frequency verification for inverter 34.

IP3 License Amendment 205 issued February 27, 2001 for conversion to ITS included a Note for Surveillance Requirement (SR) 3.8.7.1 which stated that frequency verification for inverter 34 is not required to be performed. The basis for this note is that inverter 34 did not have installed instrumentation to support frequency measurement. Since that time, Entergy has implemented a plant modification which included a new inverter 34 that does have instrumentation for frequency measurement. Entergy at that time also established administrative controls to perform frequency verification of inverter 34 as part of performing SR 3.8.7.1. Since frequency instrumentation for inverter 34 is now available, the note for SR 3.8.7.1 is obsolete and can be deleted.

- Item 9; Delete one-time note regarding ILRT test interval

IP2 License Amendment 232 issued August 5, 2002 and IP3 License Amendment 206 issued April 17, 2001 added Notes allowing one-time extensions of the ILRT test frequency from 10 years to 15 years. The allowance has been applied for the affected ILRTs (Refueling Outage 2R17, Spring 2006 for IP2 and 3R13, Spring 2005 for IP3) and these one-time Notes can be deleted.

- Item 10; Delete note regarding charcoal bed depth for control room ventilation system

IP3 License Amendment 219 issued October 30, 2003 revised the Ventilation Filter Testing Program to adopt the requirements of ASTM D3803-1989 ("Standard Test Method for Nuclear-Grade Activated Carbon") in response to NRC Generic Letter 99-02 ("Laboratory Testing of Nuclear-Grade Activated Charcoal"). The amendment included an allowance for continued use of the Control Room Ventilation System (CRVS) one-inch charcoal filter beds until a plant modification was completed for installation of two-inch filter beds. Entergy completed the installation of the new two-inch beds during refueling outage 3R13 (Spring 2005) so that the notation regarding interim use of the one-inch beds is now obsolete and can be deleted.

3.0 TECHNICAL ANALYSIS

The proposed changes addressed in this license amendment request are editorial in nature and do not require a technical analysis.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Consideration

Entergy Nuclear Operations, Inc. (Entergy) has evaluated the safety significance of the proposed editorial changes to the Indian Point 2 (IP2) and Indian Point 3 (IP3) Technical Specifications consisting of typographical corrections, update of references, and deletion of obsolete notes. These proposed changes have been evaluated according to the criteria of 10 CFR 50.92, "Issuance of Amendment". Entergy has determined that the subject changes do not involve a Significant Hazards Consideration as discussed below:

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

Response: No

The proposed changes are editorial in nature and have no affect on accident scenarios previously evaluated. The proposed changes include typographical corrections, consistent with the current version of the Standard Technical Specifications (NUREG 1431, Revision 3); updated references, consistent with the current version of the Entergy Quality Assurance Program Manual (Revision 13); and deletion of notes that provided one-time allowances or are otherwise now obsolete. The proposed changes do not affect initiating events for accidents previously evaluated and do not affect or modify plants systems or procedures used to mitigate the progression or outcome of those accident scenarios.

Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated?

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

Response: No

The proposed changes do not involve the installation of new plant equipment or modification of existing plant equipment. No system or component setpoints are being changed and there are no changes being proposed for the way that the plant is operated. There are no new accident initiators or equipment failure modes resulting from the proposed changes. The proposed changes are editorial in nature, consisting of typographical corrections, reference updates, and deletion of obsolete notes.

Therefore, the proposed changes do not create the possibility of a new or different kind of accident from any previously evaluated.

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

Response: No

The proposed changes are editorial in nature and do not change setpoints or limiting parameters specified in the plant Technical Specifications.

Therefore, the proposed changes do not involve a significant reduction in a margin of safety.

Based on the above, Entergy concludes that the proposed amendments to the IP2 and IP3 Technical Specifications presents no significant hazards consideration under the standards set forth in 10 CFR 50.92 (c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Environmental Considerations

The proposed changes to the IP2 and IP3 Technical Specifications do 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 offsite, 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 TWO TO NL-06-099

MARKUP OF TECHNICAL SPECIFICATION PAGES
FOR PROPOSED CHANGES REGARDING
MISCELLANEOUS EDITORIAL CHANGES

Bold, italics for added text ~~Strikeout~~ for deleted text

AFFECTED PAGES (IP2)

1.4-3
3.3.1-16
3.3.1-17
3.3.7-3
5.3-1
5.5-14

AFFECTED PAGES (IP3)

1.4-2
3.3.1-19
3.3.1-20
3.7.11-1
3.8.7-3
5.0-5
5.0-6
5.0-24
5.0-30

ENTERGY NUCLEAR OPERATIONS, INC.
INDIAN POINT NUCLEAR GENERATING UNITS NO. 2 and 3
DOCKET NO. 50-247 and 50-286

1.4 Frequency

EXAMPLES (continued)

EXAMPLE 1.4-1

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Perform CHANNEL CHECK.	12 hours

Example 1.4-1 contains the type of SR most often encountered in the Technical Specifications (TS). The Frequency specifies an interval (12 hours) during which the associated Surveillance must be performed at least one time. Performance of the Surveillance initiates the subsequent interval. Although the Frequency is stated as 12 hours, an extension of the time interval to 1.25 times the stated Frequency is allowed by SR 3.0.2 for operational flexibility. The measurement of this interval continues at all times, even when the SR is not required to be met per SR 3.0.1 (such as when the equipment is inoperable, a variable is outside specified limits, or the unit is outside the Applicability of the LCO). If the interval specified by SR 3.0.2 is exceeded while the unit is in a MODE or other specified condition in the Applicability of the LCO, and the performance of the Surveillance is not otherwise modified (refer to Example 1.4-3), then SR 3.0.3 becomes applicable.

If the interval as specified by SR 3.0.2 is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the LCO for which performance of the SR is required, **then SR 3.0.4 becomes applicable. The the Surveillance must be performed within the Frequency requirements of SR 3.0.2, as modified by SR 3.0.3, prior to entry into the MODE or other specified condition. Failure to do so would result in a violation of SR 3.0.4, or the LCO is considered not met (in accordance with SR 3.0.1) and LCO 3.0.4 becomes applicable.**

Table 3.3.1-1 (page 5 of 6)
Reactor Protection System Instrumentation

Note 1: Overtemperature ΔT

The Overtemperature ΔT Function Allowable Value shall not exceed the following:

The channel's maximum trip setpoint shall not exceed its computed trip setpoint by more than 4.9% ΔT span.

$$\Delta T \leq \Delta T_0 \left\{ K_1 - K_2 \frac{(1 + \tau_1 s)}{(1 + \tau_2 s)} [T - T'] + K_3 (P - P') - f_1(\Delta I) \right\}$$

Where: ΔT is measured RCS ΔT , °F (measured by hot leg and cold leg RTDs).
 ΔT_0 is the loop specific indicated ΔT at RTP, °F.
 s is the Laplace transform operator, sec⁻¹.
 T is the measured RCS average temperature, °F.
 T' is the loop specific indicated T_{avg} at RTP, $\leq [^*]^{\circ}F$.

P is the measured pressurizer pressure, psig
 P' is the nominal RCS operating pressure, $\geq [^*]$ psig

$K_1 \leq [^*]$
 $\tau_1 \geq [^*]$ sec

$K_2 \geq [^*]^{\circ}F$
 $\tau_2 \leq [^*]$ sec

$K_3 \geq [^*]/psig$

$f_1(\Delta I) =$

$[^*] \{ [^*] + (q_t - q_b) \}$ 0% of RTP	when $q_t - q_b \leq - [^*]\%$ RTP when $- [^*]\%$ RTP $< q_t - q_b \leq [^*]\%$ RTP when $q_t - q_b > [^*]\%$ RTP
$- [^*] \{ (q_t - q_b) - [^*] \}$	

Where q_t and q_b are percent RTP in the upper and lower halves of the core, respectively, and $q_t + q_b$ is the total THERMAL POWER in percent RTP.

These values denoted with $[^]$ are specified in the COLR.

For $f_1(\Delta I)$:

- Delete minus sign at three locations and
 -→ Change “ + ” to “ - ” at one location
- Per correction in NUREG 1431 Rev 3.

Table 3.3.1-1 (page 6 of 6)
Reactor Protection System Instrumentation

Note 2: Overpower ΔT

The Overpower ΔT Function Allowable Value shall not exceed the following:

The channel's maximum trip setpoint shall not exceed its computed trip setpoint by more than 2.4% ΔT span.

$$\Delta T \leq \Delta T_0 \left\{ K_4 - K_5 \frac{\tau_3 s}{(1 + \tau_3 s)} T - K_6 (T - T^n) - f_2(\Delta I) \right\}$$

Where: ΔT is measured RCS ΔT , °F.
 ΔT_0 is the loop specific indicated ΔT at RTP, °F.
 s is the Laplace transform operator, sec^{-1} .
 T is the measured RCS average temperature, °F.
 T^n is the loop specific indicated T_{avg} at RTP, $\leq [^*]^{\circ}\text{F}$.

$K_4 \leq [^*]$	$K_5 \geq [^*]^{\circ}\text{F}$ for increasing T_{avg} $[^*]^{\circ}\text{F}$ for decreasing T_{avg}	$K_6 \geq [^*]^{\circ}\text{F}$ when $T > T^n$ $[^*]^{\circ}\text{F}$ when $T \leq T^n$
$\tau_3 \leq [^*] \text{ sec}$		
$f_2(\Delta I) = [^*]$	→ For τ_3 : Change “ \leq ” to “ \geq ”; correction of error from ITS conversion.	

These values denoted with [^] are specified in the COLR.

Table 3.3.7-1 (page 1 of 1)
CRVS Actuation Instrumentation

FUNCTION	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUES
1. Manual Initiation	1 train	SR 3.3.7.4	NA
2. Control Building Air Intake Radiation (R-38-1)	1	SR 3.3.7.1 SR 3.3.7.2 SR 3.3.7.3 SR 3.3.7.5	≤ 0.75 mr /hr
3. Control Room Air Intake Radiation (R-38-2)	1	SR 3.3.7.1 SR 3.3.7.2 SR 3.3.7.3 SR 3.3.7.5	≤ 0.75 mr /hr
4. Safety Injection	Refer to LCO 3.3.2, "ESFAS Instrumentation," Function 1, for all initiation functions and requirements.		

→ *Revise units, 2 locations, from "mr" to "mr/hr" ;
correction from ITS conversion*

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ~~ANSI N18.1-1974~~ **ANSI / ANS 3.1-1978** for comparable positions, except for the following:

Per
Energy
QAPM

- a. The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975; and
- b. The operations manager shall meet or exceed the minimum qualifications of ~~ANSI N18.1-1974~~ **ANSI / ANS 3.1-1978** except for the SRO license requirement which shall be in accordance with Technical Specification 5.2.2.e.

5.3.2 For the purpose of 10 CFR 55.4, a licensed Senior Reactor Operator (SRO) and a licensed reactor operator (RO) are those individuals who, in addition to meeting the requirements of TS 5.3.1, perform the functions described in 10 CFR 50.54(m).

5.5 Programs and Manuals

5.5.13 Safety Function Determination Program (SFDP) (continued)

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered. When a loss of safety function is caused by the inoperability of a single Technical Specification support system, the appropriate Conditions and Required Actions to enter are those of the support system.

5.5.14 Containment Leakage Rate Testing Program

- a. A program shall establish the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September, 1995, as modified by the following exception: .

Delete one-time note
added by Amd 232

~~The Type A testing frequency specified in NEI 94-01, paragraph 9.2.3, as at least once per 10 years based on acceptable performance history is changed to allow a Type A testing frequency of at least once per 15 years based on acceptable performance history. This is a one-time only exception that applies only for the interval following the Type A test performed in June 1991.~~

- b. The calculated peak containment internal pressure for the design basis loss of coolant accident, P_a , is assumed to be the containment design pressure of 47 psig.
- c. The maximum allowable containment leakage rate, L_a , at P_a , and 271°F shall be 0.1% of containment steam air weight per day.
- d. Leakage rate acceptance criteria:
1. Containment leakage rate acceptance criterion is $1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $< 0.60 L_a$ for the Type B and C tests and $\leq 0.75 L_a$ for Type A tests.
 2. Air lock testing acceptance criteria shall be established to ensure that limits for Type B and C testing in Technical Specification 5.5.14.d.1 are met.

1.4 Frequency

EXAMPLES
(continued)

EXAMPLE 1.4-1

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
Perform CHANNEL CHECK.	12 hours

Example 1.4-1 contains the type of SR most often encountered in the Technical Specifications (TS). The Frequency specifies an interval (12 hours) during which the associated Surveillance must be performed at least one time. Performance of the Surveillance initiates the subsequent interval. Although the Frequency is stated as 12 hours, an extension of the time interval to 1.25 times the stated Frequency is allowed by SR 3.0.2 for operational flexibility. The measurement of this interval continues at all times, even when the SR is not required to be met per SR 3.0.1 (such as when the equipment is inoperable, a variable is outside specified limits, or the unit is outside the Applicability of the LCO). If the interval specified by SR 3.0.2 is exceeded while the unit is in a MODE or other specified condition in the Applicability of the LCO, and the performance of the Surveillance is not otherwise modified (refer to Example 1.4-3), then SR 3.0.3 becomes applicable.

If the interval as specified by SR 3.0.2 is exceeded while the unit is not in a MODE or other specified condition in the Applicability of the LCO for which performance of the SR is required, ***then SR 3.0.4 becomes applicable.*** The Surveillance must be performed within the Frequency requirements of SR 3.0.2, ***as modified by SR 3.0.3,*** prior to entry into the MODE or other specified condition. ~~Failure to do so would result in a violation of SR 3.0.4. or the LCO is considered not met (in accordance with SR 3.0.1) and LCO 3.0.4 becomes applicable.~~

(continued)

Table 3.3.1-1 (page 7 of 8)
Reactor Protection System Instrumentation

Note 1: Overtemperature ΔT

The Overtemperature ΔT Function Allowable Value shall not exceed the following Trip Setpoint by more than 2.8% of ΔT span :

$$\Delta T \leq \Delta T_0 \left\{ K_1 - K_2 \frac{(1 + \tau_1 s)}{(1 + \tau_2 s)} [T - T'] + K_3 (P - P') - f_1(\Delta I) \right\}$$

Where: ΔT is measured RCS ΔT , °F.
 ΔT_0 is the indicated ΔT at RTP, °F.
 s is the Laplace transform operator, sec⁻¹.
 T is the measured RCS average temperature, °F.
 T' is the nominal T_{avg} at RTP, $\leq [*]^\circ\text{F}$.

For P': Change " \leq " to " \geq ";
correction of error from ITS conversion.

P is the measured pressurizer pressure, psig
 P' is the nominal RCS operating pressure, $\leq [*]$ psig

$K_1 \leq [*]$ $K_2 \geq [*] / ^\circ\text{F}$ $K_3 \geq [*] / \text{psig}$
 $\tau_1 \geq [*] \text{ sec}$ $\tau_2 \leq [*] \text{ sec}$

$$f_1(\Delta I) = \begin{matrix} [*] \{ [*] + (q_t - q_b) \} & \text{when } q_t - q_b \leq - [*] \% \text{ RTP} \\ 0 \% \text{ of RTP} & \text{when } - [*] \% \text{ RTP} < q_t - q_b \leq [*] \% \text{ RTP} \\ - [*] \{ (q_t - q_b) - [*] \} & \text{when } q_t - q_b > [*] \% \text{ RTP} \end{matrix}$$

Where q_t and q_b are percent RTP in the upper and lower halves of the core, respectively, and $q_t + q_b$ is the total THERMAL POWER in percent RTP.

The values denoted with [*] are specified in the COLR.

For $f_1(\Delta I)$:

- Delete minus sign at three locations and
 -→ Change "+" to "-" at one location
- Per correction in NUREG 1431 Rev 3.

3.7 PLANT SYSTEMS

3.7.11 Control Room Ventilation System (CRVS)

LCO 3.7.11 Two CRVS trains shall be OPERABLE.

APPLICABILITY: MODES 1, 2, 3, 4.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CRVS train inoperable.	A.1 Restore CRVS train to OPERABLE status.	7 days* ←
B. Two CRVS trains inoperable.	B.1 Restore one CRVS train to OPERABLE status.	72 hours* ←
C. Required Action and associated Completion Time of Condition A or B not met.	C.1 Be in MODE 3.	6 hours
	<u>AND</u> C.2 Be in MODE 5.	36 hours

~~* This Completion Time is extended to 14 days on a one-time only basis to permit tracer gas testing. This applies to tracer gas testing only and is for no other purpose.~~

Delete asterisks in Conditions A and B and one-time note added by Amd 223

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.8.7.1 ----- NOTE ----- Frequency verification not required to be performed for inverter 34. ----- Verify correct inverter voltage, frequency, and alignment to required 120V AC vital instrument buses.	7 days
SR 3.8.7.2 Verify manual transfer of the AC power source for VIB 34 from inverter 34 to each required CVT.	24 months

Delete SR 3.8.7.1 Note per plant modification

5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ~~ANSI N18.1-1971~~ *ANSI / ANS 3.1-1978* for comparable positions, except for the following:

Per
Entergy
QAPM

- a. The radiation protection manager shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975; and
 - b. The operations manager shall meet or exceed the minimum qualifications of ~~ANSI N18.1-1971~~ *ANSI / ANS 3.1-1978* except for the SRO license requirement which shall be in accordance with Technical Specification 5.2.2.f.
-

5.0 ADMINISTRATIVE CONTROLS

5.4 Procedures

5.4.1 Written procedures shall be established, implemented, and maintained covering the following activities:

Per
Entergy
QAPM

- a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 0 2, Appendix A, ~~November 1972~~ **February 1978**;
 - b. The emergency operating procedures required to implement the requirements of NUREG-0737 and to NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;
 - c. Quality assurance for effluent and environmental monitoring;
 - d. Fire Protection Program implementation; and
 - e. All programs specified in Specification 5.5.
-

5.5 Programs and Manuals

5.5.10 Ventilation Filter Testing Program (VFTP) (continued)

- c. Demonstrate for each system that a laboratory test of a sample of the charcoal adsorber shows the methyl iodide removal efficiency specified below when tested in accordance with ASTM D3803-1989, subject to clarification below, at a temperature of 86°F and a relative humidity of 95%.

Ventilation System	Methyl iodide removal efficiency (%):	ASTM D3803-1989 Clarification
Control Room Ventilation System	≥ 95.5	78 ft/min face velocity
Containment Fan Cooler Units	≥ 85	59 ft/min face velocity

~~Note: For the 1" beds, the Control Room Ventilation System methyl iodide removal efficiency is verified greater than or equal to 93% rather than 95.5% at a face velocity of 50 ft/min under the above requirements. This is done prior to fuel movement in Refuel Outage 12 and every 6 months after Refuel Outage 12 until the end of Refuel Outage 13 or the 2" beds are installed.~~

Delete one-time note added by Amd 219

(continued)

5.5 Programs and Manuals

5.5.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak Test Program, dated September 1995" as modified by the following exception:

ANS 56.8-1994, Section 3.3.1: WCCPPS isolation valves are not Type C tested.

Delete one-time note added by Amd 206

~~NEI 94-01-1995, Section 9.2.3: The first Type A test performed after the December 2, 1990 Type A test shall be performed no later than December 1, 2005.~~

The maximum allowable primary containment leakage rate, L_a , at a minimum test pressure equal to P_a , shall be 0.1% of primary containment air weight per day. P_a is the peak calculated containment internal pressure related to the design basis accident.

Leakage acceptance criteria are:

- a. Containment leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_a$ for the Type B and C tests and $\leq 0.75 L_a$ for Type A tests;
- b. Air lock testing acceptance criteria are:
 - 1) Overall air lock leakage rate is $\leq 0.05 L_a$ when tested at $\geq P_a$,
 - 2) For each door, leakage rate is $\leq 0.01 L_a$ when pressurized to $\geq P_a$,
- c. Isolation Valve Seal Water System leakage rate acceptance criterion is $\leq 14,700$ cc/hr at $\geq 1.1 P_a$.
- d. Acceptance criterion for leakage into containment from isolation valves sealed with the service water system is ≤ 0.36 gpm per fan

(continued)