

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

-----REVIEWER'S NOTE-----

1. Titles for members of the unit staff shall be specified by use of an overall statement referencing an ANSI Standard acceptable to the NRC staff from which the titles were obtained, or an alternative title may be designated for this position. Generally, the first method is preferable; however, the second method is adoptable to those unit staffs requiring special titles because of unique organizational structures.
2. The ANSI Standard shall be the same ANSI Standard referenced in Section 5.3, Unit Staff Qualifications. If alternative titles are used, all requirements of these Technical Specifications apply to the position with the alternative title applied with the specified title. Unit staff titles shall be specified in the Final Safety Analysis Report or Quality Assurance Plan. Unit staff titles shall be maintained and revised using those procedures approved for modifying/revising the Final Safety Analysis Report or Quality Assurance Plan.

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

The plant manager or his designee shall approve, prior to implementation, each proposed test, experiment or modification to systems or equipment that affect nuclear safety.

5.1.2 The shift supervisor shall be responsible for the control room command function. During any absence of the shift supervisor from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Operator license shall be designated to assume the control room command function. During any absence of the shift supervisor from the control room while the unit is in MODE 5 or 6, an individual with an active Senior Operator license or Operator license shall be designated to assume the control room command function.

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5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the FSAR/QA Plan.
- b. The plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. A specified corporate officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

-----REVIEWER'S NOTE-----
Two unit sites with both units shutdown or defueled require a total of three non-licensed operators for the two units.

- a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator shall be assigned for each control room from which a reactor is operating in MODE 1, 2, 3, or 4;

5.2 Organization

5.2.2 Unit Staff (continued)

- b. Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and Specifications 5.2.2.a and 5.2.2.f for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements;
- c. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position;
- d. Administrative procedures shall be developed and implemented to limit the working hours of personnel who perform safety related functions (e.g., licensed Senior Operators, licensed Operators, health physicists, auxiliary operators, and key maintenance personnel).

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.

Any deviation from the above guidelines shall be authorized in advance by the plant manager or designee, in accordance with approved administrative procedures, and with documentation of the basis for granting the deviation. Routine deviation from the working hour guidelines shall not be authorized.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned;

- e. The operations manager or assistant operations manager shall hold a Senior Operator license; and
 - f. An individual shall provide advisory technical support to the unit operations shift crew in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. This individual shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.
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5.0 ADMINISTRATIVE CONTROLS

5.3 Unit Staff Qualifications

-----REVIEWER'S NOTE-----

Minimum qualifications for members of the unit staff shall be specified by use of an overall qualification statement referencing an ANSI Standard acceptable to the NRC staff or by specifying individual position qualifications. Generally, the first method is preferable; however, the second method is adaptable to those unit staffs requiring special qualification statements because of unique organizational structures.

5.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of Regulatory Guide 1.8, Revision 3, 2000, with the following exception:

- a. During cold license operator training prior to Commercial Operation, the following Regulatory Position C.1.b of Regulatory Guide 1.8, Revision 2, 1987, applies:

Cold license operator candidates meet the training elements defined in ANS/ANSI 3.1-1993 but are exempt from the experience requirements defined in ANS/ANSI 3.1-1993.

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

5.0 ADMINISTRATIVE CONTROLS

5.4 Procedures

- 5.4.1 Written procedures shall be established, implemented, and maintained covering the following activities:
- a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, 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.
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5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

- a. The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program, and
- b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release Reports required by Specification 5.6.1 and Specification 5.6.2.
- c. Licensee initiated changes to the ODCM:
 1. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 - a) Sufficient information to support the change(s) together with the appropriate analyses or evaluations justifying the change(s); and
 - b) A determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;
 2. Shall become effective after the approval of the plant manager; and
 3. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (i.e., month and year) the change was implemented.

5.5 Programs and Manuals

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Low Head Safety Injection, Medium Head Safety Injection, and Nuclear Sampling. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system once per 24 months.

The provisions of SR 3.0.2 are applicable.

5.5.3 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001-20.2402;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;
- e. Determination of cumulative dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days;

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5.5.3 Radioactive Effluent Controls Program (continued)

- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;
- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the site boundary shall be in accordance with the following:
 - 1. For noble gases: a dose rate \leq 500 mrem/yr to the whole body and a dose rate \leq 3000 mrem/yr to the skin; and
 - 2. For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days: a dose rate \leq 1500 mrem/yr to any organ;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives $>$ 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program Surveillance Frequencies.

5.5.4 Component Cyclic or Transient Limit

This program provides controls to track the FSAR Section 3.9.1.1, cyclic and transient occurrences to ensure that components are maintained within the design limits.

5.5 Programs and Manuals

5.5.5 Containment Post Tensioning Surveillance Program

This program provides for the monitoring of the containment post tensioning force over time. Tendons used in the containment structure are fully grouted and the structure itself is not exposed to the environment during its operational life. The program shall include initial base line measurements prior to initial operation. The Containment Post Tensioning Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with Section III Division 2 of the ASME Boiler and Pressure Vessel Code, 2004, and Regulatory Guide 1.90, Rev. 1. Since the U.S. EPR has no ungrouted tendons, force monitoring of ungrouted tendons is not required.

The provisions of SR 3.0.3 are applicable to the Containment Post Tensioning Surveillance Program inspection frequencies.

5.5.6 Reactor Coolant Pump Flywheel Inspection Program

This program shall provide for the inspection of each reactor coolant pump flywheel per the recommendations of Regulatory Position C.4.b of Regulatory Guide 1.14, Revision 1, August 1975.

5.5.7 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 pumps and valves.

- a. Testing frequencies applicable to the ASME Code for Operations and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as follows:

<u>ASME OM Code and applicable Addenda terminology for inservice testing activities</u>	<u>Required Frequencies for performing inservice testing activities</u>
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

5.5 Programs and Manuals

5.5.7 Inservice Testing Program (continued)

- b. The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified as 2 years or less in the Inservice Testing Program for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and
- d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

5.5.8 Steam Generator (SG) Program

A Steam Generator Program shall be established and implemented to ensure that SG tube integrity is maintained. In addition, the Steam Generator Program shall include the following provisions:

- a. Provisions for condition monitoring assessments. Condition monitoring assessment means an evaluation of the "as found" condition of the tubing with respect to the performance criteria for structural integrity and accident induced leakage. The "as found" condition refers to the condition of the tubing during an SG inspection outage, as determined from the inservice inspection results or by other means, prior to the plugging of tubes. Condition monitoring assessments shall be conducted during each outage during which the SG tubes are inspected or plugged to confirm that the performance criteria are being met.
- b. Performance criteria for SG tube integrity. SG tube integrity shall be maintained by meeting the performance criteria for tube structural integrity, accident induced leakage, and operational LEAKAGE.
 - 1. Structural integrity performance criterion: All in-service steam generator tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cool down and all anticipated transients included in the design specification) and design basis accidents. This includes retaining a safety factor of 3.0 against burst under normal steady state full power operation primary-to-secondary pressure differential and a safety factor of 1.4 against burst applied to the design basis accident primary-to-secondary pressure differentials. Apart from the above requirements, additional loading conditions associated with the design basis accidents, or combination of accidents in accordance with the design and licensing basis, shall also be evaluated to determine if the associated loads contribute significantly to burst or collapse.

5.5 Programs and Manuals

5.5.8 Steam Generator (SG) Program (continued)

In the assessment of tube integrity, those loads that do significantly affect burst or collapse shall be determined and assessed in combination with the loads due to pressure with a safety factor of 1.2 on the combined primary loads and 1.0 on axial secondary loads.

2. Accident induced leakage performance criterion: The primary to secondary accident induced leakage rate for any design basis accident, other than an SG tube rupture, shall not exceed the leakage rate assumed in the accident analysis in terms of total leakage rate for all SGs and leakage rate for an individual SG. Leakage is not to exceed 0.125 gpm per SG.

3. The operational LEAKAGE performance criterion is specified in LCO 3.4.12, "RCS Operational LEAKAGE."

c. Provisions for SG tube repair criteria. Tubes found by inservice inspection to contain flaws with a depth equal to or exceeding 40% of the nominal tube wall thickness shall be plugged.

d. Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube repair criteria. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of Specifications 5.5.8.d.1, 5.5.8.d.2, and 5.5.8.d.3 below, the inspection scope, inspection methods, and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. An assessment of degradation shall be performed to determine the type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.

1. Inspect 100% of the tubes in each SG during the first refueling outage and following SG replacement.

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5.5.8 Steam Generator (SG) Program (continued)

2. Inspect 100% of the tubes at sequential periods of 144, 108, 72, and, thereafter, 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. In addition, inspect 50% of the tubes by the refueling outage nearest the midpoint of the period and the remaining 50% by the refueling outage nearest the end of the period. No SG shall operate for more than 72 effective full power months or three refueling outages (whichever is less) without being inspected.
 3. If crack indications are found in any SG tube, then the next inspection for each SG for the degradation mechanism that caused the crack indication shall not exceed 24 effective full power months or one refueling outage (whichever is less). If definitive information, such as from examination of a pulled tube, diagnostic non-destructive testing, or engineering evaluation indicates that a crack-like indication is not associated with a crack(s), then the indication need not be treated as a crack.
- e. Provisions for monitoring operational primary to secondary LEAKAGE.

5.5.9 Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation and low pressure turbine disc stress corrosion cracking. The program shall include:

- a. Identification of a sampling schedule for the critical variables and control points for these variables;
- b. Identification of the procedures used to measure the values of the critical variables;
- c. Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in leakage;
- d. Procedures for the recording and management of data;
- e. Procedures defining corrective actions for all off control point chemistry conditions; and
- f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.

5.5 Programs and Manuals

5.5.10 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems in accordance with Regulatory Guide 1.52, Revision 3, ASME N510-1989, and ASME AG-1-2003. The frequencies of 5.5.10a, 5.5.10b and 5.5.10c are in accordance with Regulatory Guide 1.52, Revision 3. The Frequency for 5.5.10d and 5.5.10e is 24 months.

- a. Demonstrate for each of the ESF systems that an in place test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 3, and ASME N510-1989 at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u>Flowrate (cfm)</u>
Annulus Ventilation System (AVS)	≥ 1060 and ≤ 1295
Safeguards Building Controlled Area Ventilation System (SBCAVS)	≥ 2160 and ≤ 2640
Control Room Emergency Filtration (CREF)	≥ 3600 and ≤ 4400
Containment Low Flow Purge Subsystem (CLFPS)	≥ 2700 and ≤ 3300

- b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < 0.05% when tested in accordance with Regulatory Guide 1.52, Revision 3, and ASME N510-1989 at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u>Flowrate (cfm)</u>
AVS	≥ 1060 and ≤ 1295
SBCAVS	≥ 2160 and ≤ 2640
CREF	≥ 3600 and ≤ 4400
CLFPS	≥ 2700 and ≤ 3300

- c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 3, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C (86°F) and the relative humidity specified below.

5.5 Programs and Manuals

5.5.10 Ventilation Filter Testing Program (VFTP) (continued)

<u>ESF Ventilation System</u>	<u>Penetration</u>	<u>RH</u>	<u>Face Velocity (fpm)</u>
AVS	0.5%	≤ 70%	300
SBCAVS	0.5%	≤ 70%	375
CREF	0.5%	≤ 70%	250
CLFPS	0.5%	≤ 70%	375

- d. Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the value specified below when tested in accordance with Regulatory Guide 1.52, Revision 3, and ASME N510-1989 at the system flowrate specified below.

<u>ESF Ventilation System</u>	<u>Delta P (in wg)</u>	<u>Flowrate (cfm)</u>
AVS	7.5	≥ 1060 and ≤ 1295
SBCAVS	7.5	≥ 2160 and ≤ 2640
CREF	7.5	≥ 3600 and ≤ 4400
CLFPS	7.5	≥ 2700 and ≤ 3300

- e. Demonstrate that the heaters for each of the ESF systems dissipate the value specified below when tested in accordance with ASME N510-1989.

<u>ESF Ventilation System</u>	<u>Wattage (kw)</u>
AVS	≥ 5.4 and ≤ 6.6
SBCAVS	≥ 9.9 and ≤ 12.1
CREF	≥ 13.5 and ≤ 16.5
CLFPS	≥ 12.6 and ≤ 15.4

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP Test Frequencies.

5.5 Programs and Manuals

5.5.11 Gaseous Waste Processing System Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the Gaseous Waste Processing System and the quantity of radioactivity contained in gas delay beds. The gaseous radioactivity quantities shall be determined following the methodology in Branch Technical Position (BTP) 11-5, "Postulated Radioactive Release due to Waste Gas System Leak or Failure".

The program shall include:

- a. The limits for concentrations of hydrogen and oxygen in the Gaseous Waste Processing System and a surveillance program to ensure the limits are maintained. Such limits shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion); and
- b. A surveillance program to ensure that the quantity of radioactivity contained in the gas delay beds is less than the amount that would result in a whole body exposure of ≥ 0.5 rem to any individual in an unrestricted area, in the event of an uncontrolled release of the beds' contents.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Gaseous Waste Processing System Radioactivity Monitoring Program Surveillance Frequencies.

-----REVIEWER'S NOTE-----

The U.S. EPR does not have outdoor liquid radwaste tanks. If a COL applicant adds outdoor liquid radwaste tanks, this program will be modified accordingly.

5.5.12 Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM Standards. The purpose of the program is to establish the following:

- a. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:
 1. An API gravity or an absolute specific gravity within limits;
 2. A flash point and kinematic viscosity within limits for ASTM 2D fuel oil; and

5.5 Programs and Manuals

5.5.12 Diesel Fuel Oil Testing Program (continued)

3. A clear and bright appearance with proper color, or a water and sediment content within limits.
- b. Within 31 days following addition of the new fuel oil to storage tanks, verify that the properties of the new fuel oil, other than those addressed in Specification 5.5.12.a, above, are within limits for ASTM 2D fuel oil; and
- c. Total particulate concentration of the fuel oil is ≤ 10 mg/l when tested every 31 days.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program Surveillance Frequencies.

5.5.13 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior regulatory approval provided the changes do not require either of the following:
 1. A change in the TS incorporated in the license; or
 2. A change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.
- d. Proposed changes that meet the criteria of Specification 5.5.13.b above shall be reviewed and approved by the NRC prior to implementation. Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

5.5 Programs and Manuals

5.5.14 Safety Function Determination Program (SFDP)

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate actions may be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6.

- a. The SFDP shall contain the following:
 1. Provisions for cross train checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected;
 2. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists;
 3. Provisions to ensure that an inoperable supported system's Completion Time is not inappropriately extended as a result of multiple support system inoperabilities; and
 4. Other appropriate limitations and remedial or compensatory actions.
- b. A loss of safety function exists when, assuming no concurrent single failure, no concurrent loss of offsite power, or no concurrent loss of onsite diesel generator(s), a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:
 1. A required system redundant to the system(s) supported by the inoperable support system is also inoperable; or
 2. A required system redundant to the system(s) in turn supported by the inoperable supported system is also inoperable; or
 3. A required system redundant to the support system(s) for the supported systems described in Specifications 5.5.14.b.1 and 5.5.14.b.2 above is also inoperable.

5.5 Programs and Manuals

5.5.14 Safety Function Determination Program (SFDP) (continued)

- c. 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.

5.5.15 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 approved exceptions.
- b. The calculated peak containment internal pressure for the design basis loss of coolant accident is 52.0 psig. P_a is conservatively assumed to be 55 psig. The containment design pressure is 62 psig.
- c. The maximum allowable containment leakage rate, L_a , at P_a , shall be 0.25% of containment air weight per day.
- d. Leakage rate acceptance criteria are:
 - 1. 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 $< 0.60 L_a$ for the Type B and C tests and $\leq 0.75 L_a$ for Type A tests.
 - 2. Air lock testing acceptance criteria are:
 - a) Overall air lock leakage rate is $\leq 0.05 L_a$ when tested at $\geq P_a$.
 - b) For each door, leakage rate is $\leq 0.01 L_a$ when pressurized to ≥ 10 psig.

5.5 Programs and Manuals

5.5.15 Containment Leakage Rate Testing Program (continued)

- e. The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

-----REVIEWER'S NOTE-----
As discussed in FSAR Section 6.2.6, the U.S. EPR has no penetrations that are classified as bypass leakage paths.

5.5.16 Battery Monitoring and Maintenance Program

This Program provides for battery restoration and maintenance, based on the recommendations of IEEE Standard 450-2002, "IEEE Recommended Practice for Maintenance, Testing, and Replacement of Vented Lead-Acid Batteries for Stationary Applications," or of the battery manufacturer including the following:

- a. Actions to restore battery cells with float voltage < 2.13 V, and
- b. Actions to equalize and test battery cells that had been discovered with electrolyte level below the top of the plate.

5.5.17 Control Room Envelope Habitability Program

A Control Room Envelope (CRE) Habitability Program shall be established and implemented to ensure that CRE habitability is maintained such that, with an OPERABLE Control Room Emergency Filtration System (CREFS), CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under design basis accident (DBA) conditions without personnel receiving radiation exposures in excess of 5 rem total effective dose equivalent (TEDE) for the duration of the accident. The program shall include the following elements:

- a. The definition of the CRE and the CRE boundary;
- b. Requirements for maintaining CRE boundary in its design condition including configuration control and preventive maintenance;

5.5 Programs and Manuals

5.5.17 Control Room Envelope Habitability Program (continued)

- c. Requirements for (i) determining the unfiltered air leakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0;
- d. Measurement, at designated locations, of the CRE pressure relative to all external areas adjacent to the CRE boundary during the pressurization mode of operation by one train of the CREFS, operating at the flow rate required by the VFTP, at a Frequency of 24 months on a STAGGERED TEST BASIS. The results shall be trended and used as part of the 24 month assessment of the CRE boundary;
- e. The quantitative limits on unfiltered air leakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air leakage measured by the testing described in Specification 5.5.17.c. The unfiltered air leakage limit for radiological challenges is the leakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air leakage limits for hazardous chemicals or smoke must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis; and
- f. The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability, determining CRE unfiltered leakage, and measuring CRE pressure and assessing the CRE boundary as required by Specifications 5.5.17.c and 5.5.17.d, respectively.

-----REVIEWER'S NOTE -----

The COL applicant may add an additional program description to reflect the use of a Setpoint Control Program.

5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 Annual Radiological Environmental Operating Report

-----REVIEWER'S NOTE-----
[A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station.]

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted by May 15 of each year. The report shall include summaries, interpretations, and analyses of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM), and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

The Annual Radiological Environmental Operating Report shall include the results of analyses of all radiological environmental samples and of all environmental radiation measurements taken during the period pursuant to the locations specified in the table and figures in the ODCM, as well as summarized and tabulated results of these analyses and measurements in the format of the table in the Radiological Assessment Branch Technical Position, Revision 1, November 1979. In the event that some individual results are not available for inclusion with the report, the report shall be submitted noting and explaining the reasons for the missing results. The missing data shall be submitted in a supplementary report as soon as possible.

5.6.2 Radioactive Effluent Release Report

-----REVIEWER'S NOTE-----
[A single submittal may be made for a multiple unit station. The submittal should combine sections common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.]

The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program and in conformance with 10 CFR 50.36a and 10 CFR Part 50, Appendix I, Section IV.B.1.

5.6 Reporting Requirements

5.6.3 CORE OPERATING LIMITS REPORT (COLR)

- a. Core operating limits shall be established prior to each cycle, or prior to any remaining portion of a cycle, and shall be documented in the COLR for the following:
1. LCO 2.1.1, "Reactor Core SLs";
 2. LCO 3.1.1, "Shutdown Margin (SDM)";
 3. LCO 3.1.3, "Moderator Temperature Coefficient (MTC)";
 4. LCO 3.1.5, "Shutdown Bank Insertion Limits";
 5. LCO 3.1.6, "Control Bank Insertion Limits";
 6. LCO 3.1.7, "Rod Control Cluster Assembly (RCCA) Position Indication";
 7. LCO 3.1.9, "Physics Test Exceptions – MODE 2";
 8. LCO 3.2.1, "Linear Power Density (LPD) ";
 9. LCO 3.2.2, "Nuclear Enthalpy Rise Hot Channel Factor ($F_{\Delta H}^N$)";
 10. LCO 3.2.3, "Departure From Nucleate Boiling Ratio (DNBR)";
 11. LCO 3.2.4, "Axial Offset (AO) ";
 12. LCO 3.4.1, "RCS Pressure, Temperature, and Flow Departure from Nucleate Boiling (DNB) Limits"; and
 13. LCO 3.9.1, "Boron Concentration."
- 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. ANP-10263P, "Codes and Methods Applicability Report for the U.S. EPR";
 2. DOE/ET/34212-41 BAW-1810, "Urania Gadolinia: Nuclear Model Development and Critical Experiment Benchmark," April 1984;
 3. EMF-96-029(P)(A) Volume 1 and 2, "Reactor Analysis Systems for PWRs," January 1997;
 4. BAW-10221P-A, "NEMO-K, A Kinetics Solution in NEMO", September 1998;
 5. ANSI/ANS 19.6.1-2005, "Reload Startup Physics Tests for Pressurized Water Reactors," American Nuclear Society, 2005;
 6. BAW-10231P-A, Revision 1, "COPERNIC Fuel Rod Design Computer Code," June 2002;

5.6 Reporting Requirements

7. AREVA NP Topical Report ANP-10287P, "Incore Trip Setpoint and Transient Methodology for U.S. EPR," November 2007;
 8. AREVA NP Topical Report ANP-10286P, "U.S. EPR Rod Ejection Accident Methodology Topical Report," November 2007;
 9. EMF-2310(P)(A), "SRP Chapter 15 Non-LOCA Methodology for Pressurized Water Reactors," Revision 1, May 2004;
 10. AREVA NP Technical Report ANP-10291P, "Small Break LOCA and Non-LOCA Sensitivity Studies and Methodology," November 2007;
and
 11. AREVA NP Topical Report ANP-10278P, "U.S. EPR Realistic Large Break Loss of Coolant Accident," March 2007.
- c. The core operating limits shall be determined assuming operation at RATED THERMAL POWER such that all applicable limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems (ECCS) limits, nuclear limits such as SDM, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any midcycle revisions or supplements, shall be provided upon issuance for each reload cycle to the NRC.

5.6 Reporting Requirements

5.6.4 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

- a. RCS pressure and temperature limits for heat up, cooldown, low temperature operation, criticality, and hydrostatic testing, low temperature overpressure protection settings, and pressurizer safety relief valve lift settings as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:
 - 1. LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits;"
 - 2. LCO 3.4.11, "Low Temperature Overpressure Protection (LTOP)."
- b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:
 - 1. ANP-10283P, Rev. 1, "U.S. EPR Pressure-Temperature Limits Methodology for RCS Heatup and Cooldown."
- c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

5.6.5 Post Accident Monitoring Report

When a report is required by Condition B of LCO 3.3.2, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6 Reporting Requirements

5.6.6 Containment Post Tensioning Surveillance Report

Any abnormal degradation of the containment structure detected during the tests required by the Containment Post Tensioning Surveillance Program shall be reported to the NRC within 30 days. The report shall include a description of the tendon condition, the condition of the concrete (especially at tendon anchorages), the inspection procedures, the tolerances on cracking, and the corrective action taken.

5.6.7 Steam Generator Tube Inspection Report

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.8, "Steam Generator (SG) Program". The report shall include:

- a. The scope of inspections performed on each SG;
 - b. Active degradation mechanisms found;
 - c. Nondestructive examination techniques utilized for each degradation mechanism;
 - d. Location, orientation (if linear), and measured sizes (if available) of service induced indications;
 - e. Number of tubes plugged during the inspection outage for each active degradation mechanism;
 - f. Total number and percentage of tubes plugged to date; and
 - g. The results of condition monitoring, including the results of tube pulls and in situ testing.
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5.0 ADMINISTRATIVE CONTROLS

5.7 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:

5.7.1 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 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.
- c. Individuals qualified in radiation protection procedures and personnel continuously escorted by such individuals may be exempted from the requirement for an RWP or equivalent while performing their assigned duties provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.
- d. Each individual (whether alone or in a group) entering such an area shall possess one of the following:
 1. A radiation monitoring device that continuously displays radiation dose rates in the area;
 2. A radiation monitoring device that continuously integrates the radiation dose rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint;
 3. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area; or
 4. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,

5.7 High Radiation Area

5.7.1 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 (continued)

- (i) Be under the surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
 - (ii) Be under the surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, of personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with individuals in the area who are covered by such surveillance.
- e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation

- a. Each entryway to such an area shall be conspicuously posted as a high radiation area and shall be provided with a locked or continuously guarded door, gate, or other barrier that prevents unauthorized entry, and, in addition:
 - 1. All such door and gate keys shall be maintained under the administrative control of the shift supervisor, radiation protection manager, or his or her designees; and
 - 2. Doors and gates shall remain locked except during periods of personnel or equipment entry or exit.
- b. Access to, and activities in, each such area shall be controlled by means of an RWP or equivalent that includes specification of radiation dose rates in the immediate work area(s) and other appropriate radiation protection equipment and measures.

5.7 High Radiation Area

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

- c. Individuals qualified in radiation protection procedures may be exempted from the requirement for an RWP or equivalent while performing radiation surveys in such areas provided that they are otherwise following plant radiation protection procedures for entry to, exit from, and work in such areas.
- d. Each individual (whether alone or in a group) entering such an area shall possess one of the following:
 - 1. A radiation monitoring device that continuously integrates the radiation rates in the area and alarms when the device's dose alarm setpoint is reached, with an appropriate alarm setpoint;
 - 2. A radiation monitoring device that continuously transmits dose rate and cumulative dose information to a remote receiver monitored by radiation protection personnel responsible for controlling personnel radiation exposure within the area with the means to communicate with and control every individual in the area; or
 - 3. A self-reading dosimeter (e.g., pocket ionization chamber or electronic dosimeter) and,
 - (i) Be under surveillance, as specified in the RWP or equivalent, while in the area, of an individual qualified in radiation protection procedures, equipped with a radiation monitoring device that continuously displays radiation dose rates in the area; who is responsible for controlling personnel exposure within the area, or
 - (ii) Be under surveillance as specified in the RWP or equivalent, while in the area, by means of closed circuit television, or personnel qualified in radiation protection procedures, responsible for controlling personnel radiation exposure in the area, and with the means to communicate with and control every individual in the area.
 - 4. In those cases where Specifications 5.7.2.d.2 and 5.7.2.d.3 above are impractical or determined to be inconsistent with the "As Low As is Reasonably Achievable" principle, a radiation monitoring device that continuously displays radiation dose rates in the area.

5.7 High Radiation Area

5.7.2 High Radiation Areas with Dose Rates Greater than 1.0 rem/hour at 30 Centimeters from the Radiation Source or from any Surface Penetrated by the Radiation, but less than 500 rads/hour at 1 Meter from the Radiation Source or from any Surface Penetrated by the Radiation (continued)

- e. Except for individuals qualified in radiation protection procedures, or personnel continuously escorted by such individuals, entry into such areas shall be made only after dose rates in the area have been determined and entry personnel are knowledgeable of them. These continuously escorted personnel will receive a pre-job briefing prior to entry into such areas. This dose rate determination, knowledge, and pre-job briefing does not require documentation prior to initial entry.

 - f. Such individual areas that are within a larger area where no enclosure exists for the purpose of locking and where no enclosure can reasonably be constructed around the individual area need not be controlled by a locked door or gate, nor continuously guarded, but shall be barricaded, conspicuously posted, and a clearly visible flashing light shall be activated at the area as a warning device.
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