ATTACHMENT I TO IPN-98-113

PROPOSED TECHNICAL SPECIFICATION CHANGES

REGARDING CHEMICAL VOLUME AND CONTROL SYSTEM

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

3.2 Deleted

TABLE 4.1-1 (Sheet 2 of 6)

Channel Description	Check	Calibrate	Test	Remarks
8. 6.9 KV Voltage	N.A.	18M	Q	Reactor protection circuits only
6.9 KV Frequency	N.A.	24M	Q	Reactor protection circuits only
9. Analog Rod Position	S	24M	M	
10. Steam Generator Level	S	24M	Q	
11. Residual Heat Removal Pump Flow	N.A.	24M	N.A.	
12. Deleted				
13. Refueling Water Storage Tank Level				
a. Transmitter	W	18M	N.A.	Low level alarm
b. Indicating Switch	W	6M	N.A.	Low level alarm
14a. Containment Pressure - narrow range	S	24M	Q	High and High-High
14b. Containment Pressure - wide range	M	18M	N.A.	
15. Process and Area Radiation Monitoring:				
a. Fuel Storage Building Area Radiation Monitor (R-5)	D	24M	Q	
b. Vapor Containment Process Radiation Monitors (R-11 and R-12)	D	24M	Q	
c. Vapor Containment High Radiation Monitors (R-25 and R-26)	D	24M	Q	
d. Wide Range Plant Vent Gas Process Radiation Monitor (R-27)	D	24M	Q	

Amendment No. 8, 38, 65, 68, 74, 93, 107, 125, 137, 140, 144, 148, 150, 154, 169,

TABLE 4.1-1 (Sheet 4 of 6)

Channel Description	Check	Calibrate	Test	Remarks
25. Level Sensors in Turbine Building	N.A.	N.A.	24M	
26. Deleted				
27. Deleted				
28. Auxiliary Feedwater:				Low-Low
a. Steam Generator Level	S	24M	Q	
b. Undervoltage	N.A.	24M	24M	
c. Main Feedwater Pump Trip	N.A.	N.A.	24M	
29. Reactor Coolant System Subcooling Margin Monitor	D	18M****	N.A.	
30. PORV Position Indicator	N.A.	N.A.	24M	Limit Switch
31. PORV Position Indicator	D	24M	24M	Acoustic Monitor
32. Safety Valve Position Indicator	D	24M	24M	Acoustic Monitor
33. Auxiliary Feedwater Flow Rate	N.A.	18M	N.A.	
34. Plant Effluent Radioiodine/ Particulate Sampling	N.A.	N.A.	18M	Sample line common with monitor R-13
35. Loss of Power				
a. 480v Bus Undervoltage Relay	N.A.	24M	M	
b. 480v Bus Degraded Voltage Relay	N.A.	18M	M	
c. 480v Safeguards Bus Undervoltage Alarm	N.A.	24M	M	
36. Containment Hydrogen Monitors	D	Q	M	

Amendment No. 38, 44, 54, 63, 67, 74, 93, 125, 136, 137, 142, 144, 150, 168, 169,

TABLE 4.1-2 (Sheet 1 of 2)

FREQUENCIES FOR SAMPLING TESTS

Sample	Analysis	Frequency	Maximum Time Between Analysis
1. Reactor Coolant	Gross Activity(1)	5 days/week(1)(4)	3 day(4)
	Tritium Activity	Weekly(1)	10 days
	Boron Concentration	2 days/week	5 days
	Radiochemical (gamma)(2) Spectral Check	Monthly	45 days
	Oxygen and Chlorides Concentration	3 times per 7 days	3 days
	Fluorides Concentration	Weekly	10 days
	$\bar{E}$ Determination (3)	Semi-Annually	30 Weeks
	Isotopic Analysis for I-131, I-133, I-135	Once per 14 days(5)	20 days
2. Deleted			
3. Spray Additive Tank	NaOH Concentration	Monthly	45 days
4. Accumulators	Boron Concentration	Monthly	45 days
5. Refueling Water Storage Tank	Boron Concentration pH, Chlorides	Monthly	45 days
	Gross Activity	Quarterly	16 weeks
6. Secondary Coolant	I-131 Equivalent (Isotopic Analysis)	Monthly	45 days
	Gross Activity	3 times per 7 days	3 days
7. Component Cooling Water	Gross Activity, Corrosion Inhibitor and pH	Monthly	45 days
8. Spent Fuel Pool (when fuel stored)	Gross Activity Boron Concentration, Chlorides	Monthly	45 days

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TABLE 4.1-3 (Sheet 1 of 2)

FREQUENCIES FOR EQUIPMENT TESTS		
	Check	Frequency
1. Control Rods	Rod drop times of all control rods	24M
2. Control Rods	Movement of at least 10 steps in any one direction of all control rods	Every 31 days during reactor critical operations
3. Pressurizer Safety Valves	Set Point	24M*
4. Main Steam Safety Valves	Set Point	24M
5. Containment Isolation System	Automatic actuation	24M
6. Refueling System Interlocks	Functioning	Each refueling, prior to movement of core components
7. Primary System Leakage	Evaluate	5 days/week
8. Diesel Generators Nos. 31, 32 & 33 Fuel Supply	Fuel Inventory	Weekly
9. Turbine Steam Stop Control Valves	Closure	Yearly
10. L.P. Steam Dump System (6 lines)	Closure	Monthly
11. Service Water System	Each pump starts and operates for 15 minutes (unless already operating)	Quarterly
12. Deleted		

* Pressurizer Safety Valve setpoint test due no later than May 1996 may be deferred until the next refueling outage but no later than May 31, 1997.

ATTACHMENT II TO IPN-98-113

SAFETY EVALUATION OF PROPOSED TECHNICAL SPECIFICATION RELOCATION REGARDING CHEMICAL VOLUME AND CONTROL SYSTEM

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
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Section I - Description of Changes

This application for amendment to the Indian Point 3 (IP3) Technical Specification (TS) proposes to relocate (i.e., remove from TS) the Chemical Volume and Control System (CVCS) TS 3.2 to the IP3 Operational Specifications. The proposed change relocates TS 3.2, the bases and the associated surveillances in Table 4.1-1 (items 12, 26, and 27), Table 4.1-2 (item 2), and Table 4.1-3 (item 12). The TS relocation is proposed since NYPA has not yet implemented the improved TS and the relocation is expected to save time and resources because several items of the CVCS TS require amending (e.g., the city water LCO has no action statement).

An implementation period of 60 days has been requested because NYPA plans to reformat and revise the relocated requirements during the implementation period to reflect the format of the Standard Technical Specification (STS) (Reference 1), the current licensing basis, and the guidance of older STS (Reference 2).

Section II - Evaluation of Changes

NYPA proposes a line item change to relocate the CVCS TS. This TS relocation is being proposed since NYPA has not yet implemented improved TS which do not contain CVCS TS. NYPA is proposing no changes to the TS (other than relocation) for review and approval by the NRC. However, NYPA does not plan to issue administrative controls based on the unchanged TS. During the TS implementation period, NYPA plans to revise the relocated TS requirements and then issue the plant Operating Specifications (OS) with the revised requirements. The OS are administrative controls and the provisions of 10 CFR 50.59 are followed to implement changes to these controls.

The NRC developed four criteria for determining when a TS was required. These criteria were incorporated into 10 CFR 50.36(c)(2)(ii) as part of the TS improvement effort. The NRC policy statement (Reference 3) related to this revision acknowledged that implementation of the criteria might cause requirements of the TS to be relocated. The CVCS TS may be relocated because they do not meet the requirements of 10 CFR 50.36(c)(2)(ii) which define when TS are required. For this reason, the current STS (Reference 1) no longer contain CVCS TS. A review of the provisions of 10 CFR 50.36(c)(2)(ii) with respect to Indian Point 3 confirm that the CVCS TS may be relocated. That review shows the following relative to the four criteria for needing a TS:

- The first criterion is for instrumentation used to detect significant reactor coolant pressure boundary degradation. The CVCS is used to borate the RCS to provide shutdown margin and to control RCS inventory. The CVCS function does not include detecting significant degradation of the RCS boundary. Therefore, a CVCS TS is not required by the first criterion.

- The second criterion is for process variables, design features or operating restrictions that are an initial condition of a design basis accident or transient that assumes the failure of or presents a challenge to the integrity of a fission product barrier. The CVCS

is not an engineered safety feature and is not credited with mitigating any design basis accident. The CVCS malfunction that causes the inadvertent boron dilution event is a failure of the system and manual action terminates the event without challenging the fission product barrier. Therefore, a CVCS TS is not required by the second criterion.

- The third criterion is for structures, systems and components that are part of the primary success path and which functions or actuates to mitigate a design basis event that assumes the failure of or presents a challenge to the integrity of a fission product barrier. The CVCS is not an engineered safety feature and is not credited with mitigating any design basis accident. The CVCS malfunction that causes the inadvertent boron dilution event is a failure of the equipment and manual action terminates the event without challenging the fission product barrier. Therefore, a CVCS TS is not required by the third criterion.

- The last criterion is for structures, systems and components that operating experience or probabalistic risk analysis has shown to be significant to public health and safety. The IP3 individual plant examination (IPE) (Reference 4) identifies the CVCS boration function for ATWS and the RCP seal cooling function for the station blackout, reactor coolant pump seal LOCA and Appendix R sequences. The use of the charging function with city water cooling for the turbine missile event (referred to in the TS bases) is not considered in the IPE and is a low probability event. The NRC guidance in SECY 95-128 "Final Rulemaking Package for 10 CFR 50.36, "Technical Specifications"," dated May 19, 1995 indicates that PRA insights should be utilized to indicate "whether the provisions to be relocated contain constraints of importance in limiting the likelihood or severity of the accident sequences that are commonly found to dominate risk." The mean core damage frequency for the four sequences utilizing CVCS represent 2.3 percent of the total core damage frequency. Therefore the CVCS TS do not "dominate risk." The constraints in the relocated TS are not important to "limiting the likelihood" of the accident sequences since the availability of the boration pathways is not an initiator of the four events. The constraints are also not of importance in "limiting the severity" of the events since the capability to borate is important to normal operation and repair of any inoperable equipment would be accorded a high priority for repair. This is similar to the controls for other equipment relied upon for ATWS mitigation, Appendix R shutdown and station blackout which has not been classified safety grade or added to TS. It is required that this equipment be kept operable using administrative controls in order to maintain the plant design basis.

Section III - No Significant Hazards Evaluation

Consistent with the criteria of 10 CFR 50.92, the enclosed application is judged to involve no significant hazards based on the following information:

(1) Does the proposed license amendment involve a significant increase in the probability or consequences of an accident previously analyzed?

Response:

Relocation (i.e., removal from TS) of TS 3.2, the bases and the associated surveillances in Table 4.1-1 (items 12, 26, and 27), Table 4.1-2 (item 2), and Table 4.1-3 (item 12) will not involve a significant increase the probability or consequences of an accident since the relocation of the Technical Specifications to administrative controls governed by 10 CFR 50.59 does not affect the availability or function of charging and boric acid flow paths. CVCS is not an initiator of an accident (the dilution event is equipment malfunction that is manually terminated) and the proposed change does not alter overall system operation, physical design, system configuration, or operational setpoints. There will be no significant increase in the consequences of an accident because the required boration flow paths will continue to be available for boration to the reactor coolant system.

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

Response:

Relocation (i.e., removal from TS) of TS 3.2, the bases and the associated surveillances in Table 4.1-1 (items 12, 26, and 27), Table 4.1-2 (item 2), and Table 4.1-3 (item 12) will not create the possibility of a new or different kind of accident from any previously evaluated since it does not alter the overall system operation, physical design, system configuration, or operational setpoints. The plant systems for boration are operated in the same manner as before and, consequently, the relocation does not introduce any new accident initiators or failure mechanisms and does not invalidate the existing dilution event response. The boration function is not an accident initiator.

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

Response:

Relocation (i.e., removal from TS) of TS 3.2, the bases and the associated surveillances in Table 4.1-1 (items 12, 26, and 27), Table 4.1-2 (item 2), and Table 4.1-3 (item 12) will not involve a significant reduction in margin of safety. The relocation is a change to the administrative controls that are used to assure system availability and those administrative controls are governed by 10 CFR 50.59. The manner in which the system is operated does not change and there is no change to physical design, system configuration, or operational setpoints. Previous analyses of system malfunction remain unchanged. The current Technical Specification does not meet the criteria in 10 CFR 50.36(c)(2)(ii) for inclusion in the technical specifications.

Section IV - Effect of Changes

The proposed relocation does not adversely affect the operation or testing of the system and no modifications will be required. There would be no adverse effect on the ALARA Program since no additional dose would be foreseen. There would be no adverse effect on the Security and

Fire Protection Programs since there are no physical changes requiring security and Appendix R requirements for charging pumps are already subject to administrative controls. There would be no adverse effect on the Emergency Plan since the boration capability and system operation will not be changed and the Operational Specification changes are subject to 10 CFR 50.59. A review of the FSAR and SER conclusions identified no information that will be inconsistent with the proposed changes. Section 9.2 of the FSAR will be revised to reference administrative controls (the Operational Specifications) rather than the Technical Specifications for tests and inspections and boric acid storage tank operation. Section 9.2 will also be revised to clarify that, when one BAST was taken out of service and the other filled with the required quantity of borated water, there is no requirement that the plant "would" be placed in cold shutdown. This clarification is made at this time since the Technical Specifications being relocated do not currently require going to cold shutdown with one BAST out of service. There will be no effect on overall plant operations and the environment since system operation will remain the same and there will be no changes to plant effluents or radwaste.

Section V - Conclusions

The relocation of the CVCS TS will not involve a significant hazard since the relocation : a) will not significantly increase the probability nor the consequences of an accident previously evaluated; b) will not create the possibility of a new or different kind of accident than previously evaluated; and, c) will not significantly reduce the margin of safety.

Section VI - References

1. NUREG 1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1, dated April 1995.

2. NUREG 0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors," Revision 4, dated November 1981.

3. NRC "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," dated July 22, 1993.

4. IP3-RPT-MULT-01539, Rev. 0, "Indian Point Three Nuclear Power Plant Individual Plant Examination," dated June 1994.

ATTACHMENT III TO IPN-98-113

MARKUP OF EXISTING TECHNICAL SPECIFICATION TO SHOW PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING CHEMICAL VOLUME AND CONTROL SYSTEM

NEW YORK POWER AUTHORITY
INDIAN POINT 3 NUCLEAR POWER PLANT
DOCKET NO. 50-286
DPR-64

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3.2 CHEMICAL AND VOLUME CONTROL SYSTEM

Applicability

Applies to the operational status of the Chemical and Volume Control System.

Objective

To define those conditions of the Chemical and Volume Control System necessary to ensure safe reactor operation.

Specification

A. When fuel is in the reactor there shall be at least one flow path to the core for boric acid injection.

B. The reactor shall not be brought above the cold shutdown condition unless the following requirements are met:

1. Two charging pumps shall be operable.

2. Two boric acid transfer pumps shall be operable.

3. The boric acid storage system shall contain a minimum of 6100 gallons of 11 1/2% to 13% by weight (20,112 ppm to 22,735 ppm of boron) boric acid solution at a temperature of at least 145°F.

4. System piping and valves shall be operable to the extent of establishing one flow path from the boric acid storage system and one flow path from the refueling water storage tank (RWST) to the Reactor Coolant System.

5. The appropriate boric acid storage tank level indicator(s) shall be operating.

6. Two channels of heat-tracing shall be operable for the flow path from the boric acid storage system to the Reactor Coolant System.

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7. City water piping and valves shall be operable to the extent required to provide emergency cooling water to the charging pumps and flush water for the concentrated boric acid piping from the outlet of the boric acid storage tanks to the charging pump suction.

C. The requirements of 3.2.B may be modified to allow any one of the following components to be inoperable at any one time:

1. One of the two operable charging pumps may be removed from service provided a second charging pump is restored to an operable status within 24 hours.

2. One boric acid transfer pump may be inoperable for a period not to exceed 48 hours.

3. The boric acid storage system may be inoperable for a period not to exceed 48 hours provided that the RWST is operable.

4. One channel of heat tracing for the flow path from the boric acid storage system to the Reactor Coolant System may be out of service provided the failed channel is restored to an operable status within 7 days and the redundant channel is demonstrated to be operable daily during that period.

D. If the Chemical and Volume Control System is not restored to meet the requirements of 3.2.B within the time period specified in 3.2.C, then:

1. If the reactor is critical, it shall be brought to the hot shutdown condition utilizing normal operating procedures. The shutdown shall start no later than at the end of the specified time period.

2. If the reactor is subcritical, the reactor coolant system temperature and pressure shall not be increased more than 25°F and 100 psi, respectively, over existing values.

3. In either case, if the requirements of 3.2.B are not satisfied within an additional 48 hours, the reactor shall be brought to the cold shutdown condition utilizing normal operating procedures. The shutdown shall start no later than the end of the 48 hour period.

BASIS

The Chemical and Volume Control System[1] provides control of the Reactor Coolant System boron inventory. This is normally accomplished by using any one of the three charging pumps in series with either one of the two boric acid transfer pumps. An alternate method of boration will be to use the charging pumps taking suction directly from the refueling water storage tank. A third method will be to depressurize and use the safety injection pumps.

There are three sources of borated water available for injection through 3 different paths:

1. The boric acid transfer pumps can deliver the contents of the boric acid storage system to the charging pumps.

2. The charging pumps can take suction from the refueling water storage tank.

3. Injection of borated water from the refueling water storage tank with the safety injection pumps[2].

The quantity of boric acid in storage from either the boric acid storage system or the refueling water storage tank is sufficient to borate the reactor coolant in order to reach cold shutdown at any time during core life.

A combined minimum deliverable volume of 6100 gallons with an averaged concentration of the 11 1/2% to 13% by weight (20,112 ppm to 22,735 ppm of boron) of boric acid are required to meet cold shutdown conditions. An upper concentration limit of 13% (22,735 ppm of boron) boric acid in the boric acid storage system is specified to maintain solution solubility at the specified low temperature limit of 145°F. One channel of heat tracing is sufficient to maintain the specified low temperature limit. The second channel of heat tracing provides backup for continuous plant operation when one channel is inoperable. Should both channels of heat tracing become inoperable, the reactor will be shutdown and can easily be borated before the line temperature is reduced near the boric acid precipitive temperature.

The city water system is used as a source of water for emergency cooling of the charging pumps and as a source of flush water to remove concentrated boric acid from the piping between the outlet of the boric acid storage tanks and the inlet to the charging pumps in the unlikely event of a complete loss of electrical power and/or a complete loss of service water resulting from turbine missiles.

References

1) FSAR - Section 9.2
2) FSAR - Section 6.2
3) "Revised Feasibility Report For BIT Elimination For Indian Point Unit 3," July 1988 (Westinghouse report).

TABLE 4.1-1 (Sheet 2 of 6)

Channel Description	Check	Calibrate	Test	Remarks
8. 6.9 KV Voltage	N.A.	18M	Q	Reactor protection circuits only
6.9 KV Frequency	N.A.	24M	Q	Reactor protection circuits only
9. Analog Rod Position	S	24M	M	
10. Steam Generator Level	S	24M	Q	
11. Residual Heat Removal Pump Flow	N.A.	24M	N.A.	
12. Deleted Boric Acid Tank Level	S	24M	N.A.	Bubbler tube rodded during calibration
13. Refueling Water Storage Tank Level				
a. Transmitter	W	18M	N.A.	Low level alarm
b. Indicating Switch	W	6M	N.A.	Low level alarm
14a. Containment Pressure - narrow range	S	24M	Q	High and High-High
14b. Containment Pressure - wide range	M	18M	N.A.	
15. Process and Area Radiation Monitoring:				
a. Fuel Storage Building Area Radiation Monitor (R-5)	D	24M	Q	
b. Vapor Containment Process Radiation Monitors (R-11 and R-12)	D	24M	Q	
c. Vapor Containment High Radiation Monitors (R-25 and R-26)	D	24M	Q	
d. Wide Range Plant Vent Gas Process Radiation Monitor (R-27)	D	24M	Q	

Amendment No. 8, 38, 65, 68, 74, 93, 107, 125, 137, 140, 144, 148, 150, 154, 169

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TABLE 4.1-1 (Sheet 4 of 6)

Channel Description	Check	Calibrate	Test	Remarks
25. Level Sensors in Turbine Building	N.A.	N.A.	24M	
26. Volume Control Tank Level	N.A.	24M	N.A.	1
27. Boric Acid Makeup Flow Channel	N.A.	24M	N.A.	1
28. Auxiliary Feedwater:				
a. Steam Generator Level	S	24M	Q	Low-Low
b. Undervoltage	N.A.	24M	24M	
c. Main Feedwater Pump Trip	N.A.	N.A.	24M	
29. Reactor Coolant System Subcooling Margin Monitor	D	18M****	N.A.	
30. PORV Position Indicator	N.A.	N.A.	24M	Limit Switch
31. PORV Position Indicator	D	24M	24M	Acoustic Monitor
32. Safety Valve Position Indicator	D	24M	24M	Acoustic Monitor
33. Auxiliary Feedwater Flow Rate	N.A.	18M	N.A.	
34. Plant Effluent Radioiodine/ Particulate Sampling	N.A.	N.A.	18M	Sample line common with monitor R-13
35. Loss of Power				
a. 480v Bus Undervoltage Relay	N.A.	24M	M	
b. 480v Bus Degraded Voltage Relay	N.A.	18M	M	
c. 480v Safeguards Bus Undervoltage Alarm	N.A.	24M	M	
36. Containment Hydrogen Monitors	D	Q	M	

TABLE 4.1-2 (Sheet 1 of 2)

FREQUENCIES FOR SAMPLING TESTS

Sample	Analysis	Frequency	Maximum Time Between Analysis
1. Reactor Coolant	Gross Activity[1]	5 days/week[1][4]	3 days[4]
	Tritium Activity	Weekly[1]	10 days
	Boron concentration	2 days/week	5 days
	Radiochemical (gamma)[2] Spectral Check	Monthly	45 days
	Oxygen and Chlorides Concentration	3 times per 7 days	3 days
	Fluorides Concentration	Weekly	10 days
	$\bar{E}$ Determination [3]	Semi-Annually	30 weeks
	Isotopic Analysis for I-131, I-133, I-135	Once per 14 days[5]	20 days
2. Boric Acid Tank (Deleted)	Boron Concentration, Chlorides	Weekly	10 days
3. Spray Additive Tank	NaOH Concentration	Monthly	45 days
4. Accumulators	Boron Concentration	Monthly	45 days
5. Refueling Water Storage Tank	Boron Concentration pH, Chlorides	Monthly	45 days
	Gross Activity	Quarterly	16 weeks
6. Secondary Coolant	I-131 Equivalent (Isotopic Analysis)	Monthly	45 days
	Gross Activity	3 times per 7 days	3 days
7. Component Cooling Water	Gross Activity, Corrosion Inhibitor and pH	Monthly	45 days
8. Spent Fuel Pool (when fuel stored)	Gross Activity Boron Concentration, Chlorides	Monthly	45 days

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TABLE 4.1-3 (Sheet 1 of 2)

FREQUENCIES FOR EQUIPMENT TESTS		
	Check	Frequency
1. Control Rods	Rod drop times of all control rods	24M
2. Control Rods	Movement of at least 10 steps in any one direction of all control rods	Every 31 days during reactor critical operations
3. Pressurizer Safety Valves	Set Point	24M*
4. Main Steam Safety Valves	Set Point	24M
5. Containment Isolation System	Automatic actuation	24M
6. Refueling System Interlocks	Functioning	Each refueling, prior to movement of core components
7. Primary System Leakage	Evaluate	5 days/week
8. Diesel Generators Nos. 31, 32 & 33 Fuel Supply	Fuel Inventory	Weekly
9. Turbine Steam Stop Control Valves	Closure	Yearly
10. L.P. Steam Dump System (6 lines)	Closure	Monthly
11. Service Water System	Each pump starts and operates for 15 minutes (unless already operating)	Quarterly
Deleted		
12. City Water Connections to Charging Pumps and Boric Acid Piping	Temporary connections available and valves operable	24M

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* Pressurizer Safety Valve setpoint test due no later than May 1996 may be deferred until the next refueling outage but no later than May 31, 1997.

Amendment No. 10, 14, 43, 65, 93, 99, 125, 126, 127, 129, 133, 144, 165, 178