



A subsidiary of Pinnacle West Capital Corporation

Palo Verde Nuclear
Generating Station

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102-06166-DCM/CJS
April 08, 2010

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

Dear Sirs:

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528, 50-529, and 50-530
Request to Amend Technical Specification (TS) 2.2, "Safety Limit
Violations" and TS 5.2.1, "Onsite and Offsite Organizations" to adopt
Technical Specification Task Force (TSTF) Travelers TSTF-5 and 65**

As permitted by 10 CFR 50.90, Arizona Public Service Company (APS) hereby requests to amend Operating License Nos. NPF-41, NPF-51, and NPF-74, by amending the Technical Specifications (TS) that are incorporated as Appendix A to the Operating Licenses for PVNGS Units 1, 2, and 3. As detailed further in the Enclosure to this letter, the proposed amendment would delete redundant reporting and operational restriction provisions from Section 2.2, *Safety Limit Violations*, consistent with TSTF-5 and replace plant specific titles with generic titles in Section 5.2.1, *Onsite and Offsite Organizations*, consistent with TSTF-65.

The Enclosure to this letter provides a detailed description of, and basis for, the proposed TS amendment, as well as technical and regulatory evaluations of the amendment. The Enclosure includes the basis for a determination that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c). Proposed TS page markups and retyped TS pages are included as Attachments 1 and 2, respectively, to the Enclosure to this letter. A markup of the affected TS Bases pages is also provided for information as Attachment 3 to the Enclosure.

As discussed further in the Enclosure, the amendment proposed herein is similar to that previously approved by the Nuclear Regulatory Commission (NRC) for the Peach Bottom Atomic Power Station, Units 2 and 3 and the Perry Nuclear Power Plant, Unit 1. In addition, both TSTF-5 and TSTF-65 were incorporated in Revision 2 of the *Standard Technical Specifications for Combustion Engineering Plants*, NUREG-1432.

ADD
NRC

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Approval of the proposed amendment is requested by December 3, 2010. Once approved, the amendment shall be implemented within 90 days.

In accordance with the PVNGS Quality Assurance Program, the Plant Review Board and the Offsite Safety Review Committee have reviewed and concurred with this proposed amendment. By copy of this letter, this submittal is being forwarded to the Arizona Radiation Regulatory Agency (ARRA) pursuant to 10 CFR 50.91(b)(1).

No commitments are being made by this letter. Should you need further information regarding this amendment request, please contact Russell A. Stroud, Licensing Section Leader, at (623) 393-5111.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 4/8/10
(Date)

Sincerely,
R.A. Stroud

DCM/RAS/CJS/gat

Enclosure: Evaluation of the Proposed Change (with 3 Attachments)

cc:	E. E. Collins Jr.	NRC Region IV Regional Administrator
	J. R. Hall	NRC NRR Project Manager
	L. K. Gibson	NRC NRR Project Manager
	R. I. Treadway	NRC Senior Resident Inspector for PVNGS
	A. V. Godwin	Arizona Radiation Regulatory Agency
	T. Morales	Arizona Radiation Regulatory Agency

ENCLOSURE

Evaluation of the Proposed Change

Subject: **Request to Amend Technical Specification (TS) 2.2, "Safety Limit Violations" and TS 5.2.1, "Onsite and Offsite Organizations" to adopt Technical Specification Task Force (TSTF) Travelers TSTF-5 and 65**

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1. SUMMARY DESCRIPTION

This evaluation supports an Arizona Public Service Company (APS) request to amend Operating License Nos. NPF-41, NPF-51, and NPF-74 for Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2, and 3, respectively. The license amendment is requested specifically to amend the Technical Specifications (TS) that are incorporated as Appendix A to the Operating Licenses for PVNGS Units 1, 2, and 3. The proposed amendment would delete redundant reporting and operational restriction provisions from Section 2.2, *Safety Limit Violations*, consistent with Technical Specification Task Force (TSTF) Change Traveler TSTF-5 (Reference 6.1) and replace plant specific titles with generic titles in Section 5.2.1, *Onsite and Offsite Organizations*, consistent with TSTF-65 (Reference 6.2).

2. DETAILED DESCRIPTION

2.1 Description of the Proposed Changes

The proposed amendment would delete redundant reporting and operational restriction provisions from Section 2.2, *Safety Limit Violations*, consistent with TSTF-5 and replace plant specific titles with generic titles in Section 5.2.1, *Onsite and Offsite Organizations*, consistent with TSTF-65. The specific changes to the PVNGS TS for Units 1, 2, and 3 are indicated in the proposed TS page markups and retyped TS pages that are included as Attachments 1 and 2, respectively, to this enclosure. A copy of the affected TS Bases page markups is also provided as Attachment 3 to this enclosure.

2.2 Basis for Requesting the Proposed Changes

TSTF-5 (Reference 6.1), deletes notification, reporting, and restart requirements if a safety limit is violated. This TSTF deletes requirements from the Technical Specifications that are duplicative or contained in other regulations (i.e., 10 CFR 50.36, 50.54, 50.72 and 50.73). TSTF-5 was approved by the NRC on June 11, 1996 and this approval was documented in NRC letter dated September 27, 1996.

TSTF-5 revised the Standard Technical Specifications (STS) Section 2.2, *Safety Limit Violations*, by deleting the following requirements that must be satisfied in the event of a safety limit (SL) violation:

- STS 2.2.3, a one-hour NRC reporting requirement, which was redundant to NRC emergency reporting requirements of 10 CFR 50.72.
- STS 2.2.4, a requirement to notify licensee management, which was redundant to licensee Quality Assurance (QA) programs required by 10 CFR 50.54 and Criterion XVI of Appendix B to 10 CFR Part 50.
- STS 2.2.5, a requirement to submit a Licensee Event Report (LER) within 30 days to the NRC and plant management, pursuant to 10 CFR 50.73. This requirement was redundant to 10 CFR 50.73.

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- 2.2.6, a requirement that the NRC give prior approval to resume plant operation, which was redundant to 10 CFR 50.36(c)(1)(i)(A).

Appropriate changes to the STS 2.2 TS Bases were also made by the TSTF-5 traveler.

The APS proposed amendment to the PVNGS TSs is consistent with the changes contained in the TSTF-5 traveler. The reporting requirements in 10 CFR 50.36(c)(7), *Initial Notification*, and 10 CFR 50.36(c)(8), *Written Reports*, require that appropriate prompt notifications and written reports be made to the NRC. They also require that these reports be performed in accordance with the requirements of 10 CFR 50.72 and 10 CFR 50.73. Thus, if a SL is violated, appropriate reporting will be made to the NRC in accordance with the regulations. As such, the TS Section 2.2.3 and 2.2.5 reporting provisions are redundant and can be deleted.

The proposed removal of the TS Section 2.2.4 and 2.2.5 notification requirements of the Director, Operations and the Senior Vice President, Nuclear, within 24 hours, and by copy of an LER, respectively, are adequately addressed in the PVNGS Quality Assurance Program description in UFSAR Sections 13.4.3.4.e, 17.2.1.6.S, 17.2.1.7.D, 17.2.2.2.B, 17.2.2.9, 17.2.2.10, 17.2.3, and 17.2.5 (specifically, 17.2.5.2.1.C, 17.2.5.2.2.E and 17.2.5.3.4.B) and implementing procedures.

Deleting the 24-hour management notification time frame is acceptable since it is only reasonable to expect utility management to be promptly informed of a SL violation considering their plant has been required to be shutdown, and restart of the plant must be authorized by the NRC. The intent of the management notification requirement will continue to be satisfied. Further, the notification provisions to utility management do not meet the 10 CFR 50.36 criteria for retention in the TS. As such, the TS management notification provisions are unnecessary and can be deleted.

The TS Section 2.2.6 plant restart restraint is redundant to 10 CFR 50.36(c)(1)(i)(A), and as such, the TS provision is unnecessary and can be deleted.

The PVNGS Technical Specification requirement of submitting a Licensee Event Report (LER) in 30 days is inconsistent with the current regulations in 10 CFR 50.73(a)(1), which specifies 60 days. The proposed amendment will remove this inconsistency. In addition, the current titles specified in the PVNGS TS, (i.e., Director, Operations and Senior Vice President, Nuclear), are subject to change and/or have changed over time, and removing these sections will preclude future Technical Specification changes for title changes for these TS sections.

The removal of these notification, reporting, and plant startup requirements from the TSs is an administrative change because the current requirements duplicate what is already contained in 10 CFR 50.36 and the QA Program, which is required by 10 CFR 50.54. The proposed amendment removes the administrative burden of maintaining

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redundant notification, reporting, and plant startup requirements. The proposed change does not adversely impact plant safety, and is consistent with the STS and TSTF-5.

The TSTF Change Traveler TSTF-65 (Reference 6.2) allows the use of generic personnel titles as provided by ANSI/ANS 3.1, *American National Standard for Selection and Training of Nuclear Power Plant Personnel*, in lieu of plant-specific personnel titles. This change does not eliminate any of the qualifications, responsibilities or requirements for these positions, since the plant-specific personnel titles are currently identified in the PVNGS UFSAR. In addition, the TSTF maintains the requirements that these positions meet the qualifications acceptable to the NRC Staff (i.e., ANSI/ANS-3.1-1978, as described in TS Section 5.3). TSTF-65 (Reference 6.2) was approved by the NRC December 2, 1997.

Specifically, the proposed amendment modifies TS Section 5.2.1, *Onsite and Offsite Organization*, sub-paragraphs a, b, and c. Sub-paragraph a. has the phrase "including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications" added to the last sentence, such that the sub-paragraph will read as follows:

- 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 UFSAR; (emphasis added)

Sub-paragraph b. is modified by deleting the plant-specific title, *Senior Vice President, Nuclear*, and replacing it with the generic title, *plant manager*, such that the sub-paragraph will read as follows:

- b. ~~The Senior Vice President, Nuclear~~ **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; (emphasis added)

Sub-paragraph c. is modified by deleting the plant-specific title, *Senior Vice President, Nuclear*, and replacing it with the generic title, *specified corporate officer*, such that the sub-paragraph will read as follows:

- c. ~~The Senior Vice President, Nuclear~~ **A specified corporate officer** shall have corporate responsibility for overall plant nuclear safety and shall take

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any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; (emphasis added)

The proposed amendment specifically addresses the plant-specific title change of the *Senior Vice President, Nuclear*, to *Executive Vice President, Nuclear and Chief Nuclear Officer (CNO)*, which is described in the PVNGS UFSAR, Revision 15, Sections 13.1.1.1.1, 13.1.1.2.1, 13.1.2.2.1, and 17.2.1.2. The proposed amendment addresses the title change by removing the plant-specific title and substituting the generic personnel titles described in TSTF-65 and ANSI/ANS-3.1. This amendment will preclude future TS changes for plant-specific title changes for the identified positions.

The proposed change to sub-paragraph b. of TS Section 5.2.1 makes clear that the position responsible for overall safe operation of the plant, and which has control over the onsite activities necessary for safe operation and maintenance of the plant, is the generic title *plant manager*. The site-specific position is the *Plant Manager*, described in PVNGS UFSAR Section 13.1.2.2.1.2, *Plant Manager*.

The proposed change to sub-paragraph c. of TS Section 5.2.1 makes clear that a *specified corporate officer* has corporate responsibility for overall plant nuclear safety. The PVNGS-specific position is the *Executive Vice President, Nuclear and CNO*. The details of this position are provided in PVNGS UFSAR Sections 13.1.1.1.1 and 13.1.2.2.1.

The plant specific titles for TS Sections 5.1.1, 5.1.2, 5.2.2 and 5.7.1.c (e.g., Department Leader, Operations, Control Room Supervisor, Operations Department Leader, Operations Supervisor, Radiation Protection Section Leader, respectively) are closely reflective of the generic position titles and are not likely to change. Each of these positions is described in PVNGS UFSAR Section 13 and the qualifications for the positions are described in Section 13.1.3, *Qualifications of Nuclear Plant Personnel*. These plant-specific titles are unchanged by this proposed amendment. The PVNGS UFSAR does not contain generic position titles for these TS positions. As stated previously, the PVNGS UFSAR does describe the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in the Technical Specifications.

Revision 2 of NUREG-1432, *Standard Technical Specifications Combustion Engineering Plants*, reflects the adoption of TSTF-5 and TSTF-65.

3. TECHNICAL EVALUATION

3.1 Introduction

APS has determined that deleting redundant reporting and operational restriction provisions from Section 2.2, *Safety Limit Violations*, consistent with TSTF-5 and

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replacing plant specific titles with generic titles in Section 5.2.1, *Onsite and Offsite Organizations*, consistent with TSTF-65 will comply with current NRC regulations and guidance, and will have no significant impact on public health and safety.

3.2 Description

As described in detail in Section 2.2, *Basis for Requesting the Proposed Changes*, the proposed changes to the PVNGS TS Sections 2.2 and 5.2.1 are consistent with TSTF-5 and TSTF-65. TSTF-5 and TSTF-65 were adopted into Revision 2 of NUREG-1432, *Standard Technical Specifications Combustion Engineering Plants*. The proposed amendment brings the PVNGS TS in closer agreement with the current version of the Standard Technical Specifications.

The proposed amendment will remove a reporting inconsistency (i.e., 30 vs. 60 days) for LERs related to safety limit violations. In addition, the current titles specified in the PVNGS TS, (i.e., Director, Operations and Senior Vice President, Nuclear), are subject to change and/or have changed over time, and removing these sections will preclude future Technical Specification changes for title changes for these TS sections.

The removal of the identified notification, reporting, plant startup requirements and plant-specific titles from the TSs is an administrative change because the current requirements duplicate what is already contained in 10 CFR 50.36 and the QA Program, which is required by 10 CFR 50.54. The proposed amendment removes the administrative burden of maintaining redundant notification, reporting, and plant startup requirements. The proposed change does not adversely impact plant safety and is consistent with the STS and TSTF-5 and TSTF-65.

3.3 Conclusion

Based on the above descriptions and conclusions, the proposed change is acceptable and operation in the proposed manner will not present undue risk to public health and safety or be inimical to the common defense and security.

4. REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

APS has determined that the proposed amendment does not require any exemptions or relief from regulatory requirements, other than the Technical Specifications, and does not affect conformance with any General Design Criteria differently than described in the PVNGS UFSAR.

4.1.1 Regulations

10 CFR 50.36(c), "Technical specifications," describes *Safety limits*, as follows:

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(i)(A) Safety limits for nuclear reactors are limits upon important process variables that are found to be necessary to reasonably protect the integrity of certain of the physical barriers that guard against the uncontrolled release of radioactivity. If any safety limit is exceeded, the reactor must be shut down. The licensee shall notify the Commission, review the matter, and record the results of the review, including the cause of the condition and the basis for corrective action taken to preclude recurrence. Operation must not be resumed until authorized by the Commission. The licensee shall retain the record of the results of each review until the Commission terminates the license for the reactor, except for nuclear power reactors licensed under § 50.21(b) or § 50.22 of this part. For these reactors, the licensee shall notify the Commission as required by § 50.72 and submit a Licensee Event Report to the Commission as required by § 50.73. Licensees in these cases shall retain the records of the review for a period of three years following issuance of a Licensee Event Report.

The proposed amendment has no impact on the continued conformance with the requirements of 10 CFR 50.36.

10 CFR 50.90, "Application for amendment of license or construction permit," addresses the requirements for a licensee desiring to amend its license and the TS incorporated therein. This request for amendment to PVNGS TS 2.2 and 5.2.1 has been prepared to meet the requirements of 10 CFR 50.90.

4.1.2 Applicable Regulatory Criteria/Guidance

As described in detail in Section 2.2, *Basis for Requesting the Proposed Changes*, the proposed changes to the PVNGS TS Sections 2.2 and 5.2.1 are consistent with TSTF-5 and TSTF-65. TSTF-5 and TSTF-65 were adopted into Revision 2 of NUREG-1432, *Standard Technical Specifications Combustion Engineering Plants*. The proposed amendment brings the PVNGS TS in closer agreement with the current version of the Standard Technical Specifications.

4.2 Precedent

TSTF-5 and TSTF-65 were adopted into Revision 2 of NUREG-1432, *Standard Technical Specifications Combustion Engineering Plants*. The changes proposed herein are similar to those previously approved by the Nuclear Regulatory Commission (NRC) for the Peach Bottom Atomic Power Station, Units 2 and 3 on May 10, 2006, as Amendment Nos. 258 and 262, respectively. In addition, similar changes were approved by the NRC for the Perry Nuclear Power Plant, Unit 1, on May 15, 2001, as Amendment No. 120.

4.3 No Significant Hazards Consideration Determination

As detailed above, the proposed amendment would delete redundant reporting and operational restriction provisions from Section 2.2, *Safety Limit Violations*, consistent with TSTF-5 and replace plant specific titles with generic titles in Section 5.2.1, *Onsite and Offsite Organizations*, consistent with TSTF-65. APS has determined that the proposed TS amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c). This determination is based on evaluation with respect to the specific criteria of 10 CFR 50.92(c) as follows:

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

Response: No.

These changes involve minor changes in organization titles and remove redundant and unnecessary reporting requirements. The changes are consistent with TSTF-5 and TSTF-65, which have been approved by the NRC Staff, and included in Revision 2 of NUREG-1432. Technical Specification Safety Limit violation reporting is redundant to 10 CFR 50.36(c)(7) and (8) and 10 CFR 50.72 and 73. The removal of the notification, reporting, and startup requirements from the TS is an administrative change because the current requirements duplicate what is already contained in the regulations. The proposed changes do not alter existing controls on plant operation (i.e., safety limit values, LCOs, Surveillance Requirements or Design Features), but only remove the administrative burden of maintaining redundant notification, reporting, and plant startup requirements.

Functions which are necessary to operate the facility safely and in accordance with the operating licenses remain within the organization and will not affect the safe operation of the plant and will continue to ensure proper control of administrative activities. The proposed changes will not affect the operation of structures, systems, or components, and will not reduce programmatic controls such that plant safety would be affected.

Based on the above, the proposed amendment does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

The proposed changes will not affect the operation of structures, systems, or components, and will not reduce programmatic controls such that plant safety

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would be affected. The generic title changes and deletion of redundant reporting are administrative.

Based on the above, the proposed amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

Response: No.

The changes are administrative and will not diminish any organizational or administrative controls currently in place. The proposed change will not affect the operation of structures, systems, or components, and will not reduce programmatic controls such that plant safety would be affected. Therefore, the proposed amendment does not involve a significant reduction in a margin of safety.

Based on the above, APS concludes that the proposed amendment does not involve a 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.

4.4 Commitments

There are no commitments being made by this license amendment request. The license amendment statements provide information to support NRC action and are not considered to be regulatory commitments. Once the license amendment is approved, APS plans to implement the amendment within 90 days.

5. ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to use of a facility component located within the restricted area, as defined in 10 CFR 20. However, as established above, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or a significant increase in the amounts of any effluents 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.

6. REFERENCES

- 6.1 Technical Specification Task Force Improved Standard Technical Specifications
Change Traveler TSTF-5-A, Revision 1
- 6.2 Technical Specification Task Force Improved Standard Technical Specifications
Change Traveler TSTF-65-A, Revision 1

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ATTACHMENT 1

Technical Specification Markup

Page:

2.0-1

2.0-2

5.2-1

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 In MODES 1 and 2, Departure from Nucleate Boiling Ratio (DNBR) shall be maintained at ≥ 1.34 .

2.1.1.2 In MODES 1 and 2, the peak fuel centerline temperature shall be maintained $< 5080^{\circ}\text{F}$ (decreasing by 58°F per 10,000 MWD/MTU for burnup and adjusting for burnable poisons per CENPD-382-P-A).

2.1.2 Reactor Coolant System (RCS) Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained at ≤ 2750 psia.

2.2 SL Violations

2.2.1 If SL 2.1.1.1 or SL 2.1.1.2 is violated, restore compliance and be in MODE 3 within 1 hour.

2.2.2 If SL 2.1.2 is violated:

2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.

2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.

~~2.2.3 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.~~

~~2.2.4 Within 24 hours, notify the Director, Operations and the Senior Vice President, Nuclear.~~

(continued)

2.0 SLs

~~2.2 SL Violations (continued)~~

~~2.2.5 Within 30 days of the violation, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC and the Director, Operations and the Senior Vice President, Nuclear.~~

~~2.2.6 Operation of the unit shall not be resumed until authorized by the NRC.~~

5.0 ADMINISTRATIVE CONTROLS

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 UFSAR;
- b. ~~The Senior Vice President, Nuclear 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. ~~The Senior Vice President, Nuclear~~ 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; and
- 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:

- a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator

(continued)

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ATTACHMENT 2

Retyped Technical Specification

Page:

2.0-1

5.2-1

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 In MODES 1 and 2, Departure from Nucleate Boiling Ratio (DNBR) shall be maintained at ≥ 1.34 .

2.1.1.2 In MODES 1 and 2, the peak fuel centerline temperature shall be maintained $< 5080^{\circ}\text{F}$ (decreasing by 58°F per 10,000 MWD/MTU for burnup and adjusting for burnable poisons per CENPD-382-P-A).

2.1.2 Reactor Coolant System (RCS) Pressure SL

In MODES 1, 2, 3, 4, and 5, the RCS pressure shall be maintained at ≤ 2750 psia.

2.2 SL Violations

2.2.1 If SL 2.1.1.1 or SL 2.1.1.2 is violated, restore compliance and be in MODE 3 within 1 hour.

2.2.2 If SL 2.1.2 is violated:

2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.

2.2.2.2 In MODE 3, 4, or 5, restore compliance within 5 minutes.

5.0 ADMINISTRATIVE CONTROLS

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 UFSAR;
- 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; and
- 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:

- a. A non-licensed operator shall be assigned to each reactor containing fuel and an additional non-licensed operator

(continued)

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ATTACHMENT 3

Technical Specification Bases Markups

Pages:

B 2.1.1-5

B 2.1.2-4

B 2.1.2-5

BASES

~~SAFETY LIMIT~~ 2.2.3

~~VIOLATIONS~~

~~(continued)~~

~~If SL 2.1.1.1 or SL 2.1.1.2 is violated, the NRC Operations Center must be notified within 1 hour, in accordance with 10 CFR 50.72 (Ref. 3).~~

~~2.2.4~~

~~If SL 2.1.1.1 or SL 2.1.1.2 is violated, the appropriate senior management of the nuclear plant and the utility shall be notified within 24 hours. This 24 hour period provides time for the plant operators and staff to take the appropriate immediate action and assess the condition of the unit before reporting to the senior management.~~

~~2.2.5~~

~~If SL 2.1.1.1 or SL 2.1.1.2 is violated, a Licensee Event Report shall be prepared and submitted within 30 days to the NRC in accordance with 10 CFR 50.73 (Ref. 4). A copy of the report shall also be provided to the senior management of the nuclear plant, and the utility Senior Vice President, Nuclear.~~

~~2.2.6~~

~~If SL 2.1.1.1 or SL 2.1.1.2 is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and actions are completed before the unit begins its restart to normal operation.~~

REFERENCES

1. 10 CFR 50, Appendix A, GDC 10, 1988.
2. UFSAR, Sections 6 and 15.
3. ~~10 CFR 50.72.~~
4. ~~10 CFR 50.73.~~

BASES

SAFETY LIMIT
VIOLATIONS

2.2.2.2 (continued)

compound the problem by adding thermal gradient stresses to the existing pressure stress.

2.2.2.3

~~If the RCS pressure SL is violated, the NRC Operations Center must be notified within 1 hour, in accordance with 10 CFR 50.72 (Ref. 6).~~

2.2.2.4

~~If the RCS pressure SL is violated, the appropriate senior management of the nuclear plant and the utility shall be notified within 24 hours. This 24 hour period provides time for the plant operators and staff to take the appropriate immediate action and to assess the condition of the unit before reporting to the senior management.~~

2.2.2.5

~~If the RCS pressure SL is violated, a Licensee Event Report shall be prepared and submitted within 30 days to the NRC in accordance with 10 CFR 50.73 (Ref. 7). A copy of the report shall also be provided to the senior management of the nuclear plant, and the utility Senior Vice President, Nuclear.~~

2.2.2.6

~~If the RCS pressure SL is violated, restart of the unit shall not commence until authorized by the NRC. This requirement ensures the NRC that all necessary reviews, analyses, and actions are completed before the unit begins its restart to normal operation.~~

(continued)

BASES

- REFERENCES
1. 10 CFR 50, Appendix A, GDC 14, GDC 15, and GDC 28.
 2. ASME, Boiler and Pressure Vessel Code, Section III, Article NB-7000.
 3. ASME, Boiler and Pressure Vessel Code, Section XI, Article IWX-5000.
 4. 10 CFR 100.
 5. UFSAR, Section 7.
 - ~~6. 10 CFR 50.72.~~
 - ~~7. 10 CFR 50.73.~~
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