

Background - Core Operating Limits Report

On October 4, 1988, the NRC issued Generic Letter 88-16, "Removal of Cycle-Specific Parameter Lists from Technical Specifications." A copy of the Generic Letter is attached. Key quotes from Generic Letter (GL) 88-16 are (emphasis added):

*License amendments are generally required each fuel cycle to update the values of cycle-specific parameter limits in Technical Specifications (TS). The processing of changes to TS that are developed using an NRC-approved methodology is an unnecessary burden on licensee and NRC resources.*

...

*This alternative [proposed in the Generic Letter] consists of three separate actions to modify the plant's TS: (1) the addition of the definition of a named formal report that includes the values of cycle-specific parameter limits that have been established using an NRC-approved methodology and consistent with all applicable limits of the safety analysis, (2) the addition of an administrative reporting requirement to submit the formal report on cycle-specific parameter limits to the Commission for information, and (3) the modification of individual TS to note that cycle-specific parameters shall be maintained within the limits provided in the defined formal report.*

*In the evaluation of this alternative, the NRC staff concluded that it is essential to safety that the plant is operated within the bounds of cycle specific parameter limits and that a requirement to maintain the plant within the appropriate bounds must be retained in the TS. However, the specific values of these limits may be modified by licensees, without affecting nuclear safety, provided that these changes are determined using an NRC-approved methodology and consistent with all applicable limits of the plant safety analysis that are addressed in the Final Safety Analysis Report (FSAR). Additionally, it was concluded that a formal report should be submitted to NRC with the values of these limits. This will allow continued trending of this information even though prior NRC approval of the changes to these limits would not be required.*

*The current method of controlling reactor physics parameters to assure conformance to 10 CFR 50.36 is to specify the specific value(s) determined to be within specified acceptance criteria (usually the limits of the safety analyses) using an approved calculation methodology. The alternative contained in this guidance controls the values of cycle-specific parameters and assures conformance to 10 CFR 50.36, which calls for specifying the lowest functional performance levels acceptable for continued staff operation, by specifying the calculation methodology and acceptance criteria. This permits operation at any specific value determined by the licensee using the specified methodology, to be within the acceptance criteria. The Core Operating Limits Report will document the specific value of parameter limits resulting from licensee's calculations including any mid-cycle revisions to such parameter values.*

...

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*A new administrative reporting requirement shall be added to existing reporting requirements, as follows.*

### *[CORE] OPERATING LIMITS REPORT*

*[6.9-X] [Core] operating limits shall be established and documented in the [CORE] OPERATING LIMITS REPORT before each reload cycle or any remaining part of a reload cycle. (If desired, the individual specifications that address [core] operating limits may be referenced.) The analytical methods used to determine the [core] operating limits shall be those previously reviewed and approved by NRC in [identify the Topical Report(s) by number, title, and date, or identify the staff's safety evaluation report for a plant-specific methodology by NRC letter and date]. The [core] operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ECCS limits, nuclear limits such as shutdown margin, and transient and accident analysis limits of the safety analysis are met. The [CORE] OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided upon issuance, for each reload cycle, to the NRC Document Control Desk with copies to the Regional Administrator and Resident Inspector.*

Note that there are no references to the COLR containing the revision numbers and dates in the justification for the change, only in the proposed TS wording.

TSTF-363-A, Rev. 0, "Revise Topical Report references in ITS 5.6.5, COLR," was submitted on March 13, 2000. It was based on a letter from Mr. Stuart A. Richards (NRC) to Mr. James F. Mallay (Siemens Power Corporation) dated December 15, 1999, entitled "Acceptance for Siemens References to Approved Topical Reports in Technical Specifications," (attached) in which the NRC stated that it is acceptable for the references to Topical Reports in ITS Section 5.6.5, COLR, to give the Topical Report title and number as long as the complete citation is given in the COLR. The NRC proposed no questions on TSTF-363 and it was approved April 13, 2000. A copy of TSTF-363-A, Rev. 0, is attached.

As of the end of 2009, 75 of 104 operating plants in the U.S. have relocated the methodology revisions and dates to the licensee-controlled COLR.

A typical NRC Safety Evaluation for TSTF-363 is for Arkansas Nuclear One, Unit 2, dated March 23, 2005 (attached). It states:

*2.0 REGULATORY EVALUATION: Title 10 of the Code of Federal Regulations (10 CFR) Paragraph 50.36(c)(2)(ii) requires that TS limiting conditions for operation be established for process variables, design features, and operating restrictions for which a value is assumed as an initial condition of a design basis accident in the licensee's safety analyses. As such, amendments are generally required for each fuel cycle to update the values of cycle-specific parameter limits in the TSs. To eliminate the need for an amendment to update the cycle-specific parameter limits for each fuel cycle while complying with 10 CFR 50.36(c)(2)(ii) requirements, the U.S. Nuclear Regulatory Commission (NRC) has allowed licensees to use an alternative incorporating the cycle-*

*specific parameter limits in the COLR. Generic Letter (GL) 88-16, "Removal of Cycle-Specific Parameter Limits from Technical Specifications" (reference 6), provides the COLR implementation guidance, which includes the requirement to list the NRC-approved analytical methods used to determine the core operating limits in the TSs. The analytical methods referenced in the TSs would identify the TRs by number, title, and date, or identify the staff's safety evaluation report for a plant-specific methodology by NRC letter and date. To further avoid the need for TS changes every time a revision to an approved TR is approved, the staff approved TS Task Force (TSTF) Traveler TSTF-363, "Revised Topical Report Reference in ITS 5.6.5, COLR" (reference 7), which allows for the listing of the TRs in the TS by only the numbers and titles, with the detailed identification of the TR revisions, supplement numbers, and approval dates specified in the COLR.*

*3.0 TECHNICAL EVALUATION: The licensee proposed to identify the TRs listed in TS 6.6.5 by listing only the TR numbers and titles, and to relocate the specific revisions, supplement numbers, and approval dates to the COLR. This is consistent with TSTF-363. The citation in the COLR would include specific information for each of the TS references to the TRs used to prepare the COLR (i.e., report number, title, revision, date, and any supplements). This method of referencing TRs allows the licensee to use current TRs to support limits in the COLR without having to submit an amendment to the TSs each time the TR is revised. The licensee also notes that future changes to the values of these limits by the licensee may only be developed using NRC approved methodologies, must remain consistent with all applicable plant safety analysis limits addressed in the safety analysis report, and are further controlled by the 10 CFR 50.59 process. The staff concludes that the licensee's amendment conforms to the guidance in NRC GL 88-16 and TSTF-363.*

In all of the reviewed Safety Evaluations, the NRC staff clearly approved the concept of relocating all the methodology revisions and dates to the licensee-controlled COLR, not the relocation of revisions and dates for specific methodologies.

#### Background - Pressure / Temperature Limits Report

On January 31, 1996, the NRC issued Generic Letter 96-03, "Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits." A copy of the Generic Letter is attached. GL 96-03 states:

*[O]nce the methodology is approved, the licensee may modify the figures, values, and parameters without the need for a license amendment and without affecting nuclear safety, provided that these changes are determined using the approved methodology and are consistent with all applicable limits of the plant design assumptions as stated in the final safety analysis report (FSAR).*

The TSTF submitted TSTF-408-A, "Relocation of LTOP Enable Temperature and PORV Lift Setting to the PTLR (CE NPSD-683)," on May 24, 2001 (attached). TSTF-408-A is only applicable to Combustion Engineering plants. The primary purpose of TSTF-408 was to receive approval for use of a Combustion Engineering Topical Report. TSTF-408 also revised the PTLR

definition to eliminate the list of specifications affected by the PTLR and to relocate the methodology revision and date to the licensee-controlled PTLR. The NRC had no questions on TSTF-408 and it was approved on September 6, 2002. The NRC provided a Safety Evaluation for TSTF-408-A (attached), which stated:

*Relocation of the P-T curves and LTOP setpoints does not eliminate the requirement to operate in accordance with the limits specified in Appendix G to 10 CFR Part 50. The requirement to operate within the limits in the named report or PTLR is specified in and controlled by the TS. Only the figures, values, and parameters associated with the P-T limits and LTOP setpoints are to be relocated to the PTLR. In order for the curves and setpoints to be relocated to a PTLR, a methodology for their development must be reviewed and approved in advance by the NRC. The methodology to be approved by the NRC is to be developed in accordance with GL 96-03. This generic letter delineates the requirements for both the methodology and the PTLR including, but not limited to, the requirements of Appendix G to 10 CFR Part 50. The PTLR review process requires that changes to the methodology be approved by the NRC. New and different methodologies that require changes to the base reference in the Administrative Controls section of the Technical Specifications must be approved by license amendment. Further, when changes are made to the figures, values, and parameters contained in the PTLR, the PTLR is to be updated and submitted to the NRC upon issuance.*

The TSTF submitted TSTF-419-A, "Revise PTLR Definition and References in ISTS 5.6.6, RCS PTLR," on September 19, 2001 (attached). TSTF-419 is applicable to Babcock & Wilcox, Westinghouse, and Boiling Water Reactors. The NRC had no questions on TSTF-419 and it was approved on March 21, 2002. The NRC provided a Safety Evaluation for TSTF-419-A (attached), which stated:

*The revision to ITS 5.6.6 to allow the Topical Reports to be identified by number and title, or the NRC Safety Evaluation for a plant specific methodology by NRC letter and date, would allow licensees to use current Topical Reports to support limits in the PTLR without having to submit an amendment to facility operating license every time the Topical Report is revised. The PTLR would provide the specific information identifying the particular approved Topical Report(s) used to determine the P/T limits or L TOP System limits. This still provides the assurance that only the approved versions of the referenced Topical Reports or plant specific methodologies will be used for the determination of the P/T limits or LTOP System limits since the complete citation will be provided in the PTLR, and those limits must be approved by the NRC.*

A review of NRC approved amendments indicates that adoption of TSTF-419 has been approved for at least 15 units (Fitzpatrick, Comanche Peak, Callaway, Byron, Braidwood, San Onofre, Sequoyah, Fort Calhoun, and Diablo Canyon). A typical Safety Evaluation for adoption of TSTF-419 is the February 22, 2007 amendment for Comanche Peak (attached), which stated:

*GL 96-03 also addresses the appropriate modifications to the administrative controls section of a facility's TS that are necessary to implement a PTLR. TSTF-419 provides guidance on an alternative set of facility TS administrative controls section changes that may be made to implement a PTLR.*

....

*Not listing the revision number and date of the topical report will allow the licensee to use later revisions of the topical report without requiring staff review and approval. This allowance is acceptable to the NRC staff because for the licensee to use later revisions of WCAP-14040-NP-A, it would need to address any conditions in the NRC staff's SE approving the use of the later revisions of the topical report and show that the conditions are met by the licensee before that later revision of the topical report could be used at CPSES.*

#### New NRC Position

In a letter dated December 11, 2009, the NRC sent a letter to the TSTF clarifying a letter dated November 2, 2009, (both attached) which described their concerns with TSTF-363-A, Rev. 0 and two similar Travelers, TSTF-408-A, Revision 1, "Relocation of LTOP Enable Temperature and PORV Lift Setting to the PTLR (CE NPSD-683)," and TSTF-419-A, Revision 0, "Revise PTLR Definition and References in ISTS 5.6.6, RCS PTLR." The attachment to the November 2 letter (which was not modified by the December 11 letter) made the following statements:

*GL 88-16 and GL 96-03 relocated the numerical values in TS Limiting Condition of Operations and added approved methodologies for calculating operating limits. This approach was considered to be acceptable so long as the Administrative Controls TS for the COLR or PTLR continued to provide a direct link to the specific methodology used to calculate the values previously listed in the TS. This arrangement would allow the actual values, previously listed in the TS, to be consistently reproduced and controlled. The guidance in GL 88-16 and GL 96-03 specifies the inclusion of Topical Report number, title, or other NRC approval document, and date in the TS for those parameters relocated to the COLR/PTLR. This approach links a particular parameter relocated to the COLR/PTLR to the specific analytical methodology that calculates the parameter. Reference to a specific revision of a methodology in the TS was deemed equivalent to listing a particular parameter in the TS that is calculated by the methodology.*

...

*Removal of the Topical Report revision numbers or approval dates from the TS in accordance with the subject TSTF Travelers does not provide a direct link to specific TS numerical values relocated to the COLR/PTLR, since there is no reference to a specific methodology. The TSTF Travelers modify the TS removing reference to specific documents and, in effect, allow reference to a range of methodologies represented by various Topical Report revisions. Since the criterion contained in Title 10 of the Code of Federal Regulations Section 50.59(c)(2)(viii) allows licensees to use previously NRC-approved methodologies, this approach is not equivalent to listing a specific parameter in the TS.*

Summarizing, the NRC staff raised the following objections to TSTF-363, TSTF-408, and TSTF-419:

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1. [The GL 88-16 and GL 96-03] approach was considered to be acceptable so long as the Administrative Controls TS for the COLR or PTLR continued to provide a direct link to the specific methodology used to calculate the values previously listed in the TS. This arrangement would allow the actual values, previously listed in the TS, to be consistently reproduced and controlled. The TSTF Travelers modify the TS removing reference to specific documents and, in effect, allow reference to a range of methodologies represented by various Topical Report revisions. Reference to a specific revision of a methodology in the TS was deemed equivalent to listing a particular parameter in the TS that is calculated by the methodology.
2. The guidance in GL 88-16 and GL 96-03 specify the inclusion of Topical Report number, title, or other NRC approval document, and date in the TS for those parameters relocated to the COLR/PTLR.
3. The criterion contained in Title 10 of the Code of Federal Regulations Section 50.59(c)(2)(viii) allows licensees to use previously NRC-approved methodologies. This approach is not equivalent to listing a specific parameter in the TS.

### Evaluation

Issue 1: [The GL 88-16 and GL 96-03] approach was considered to be acceptable so long as the Administrative Controls TS for the COLR or PTLR continued to provide a direct link to the specific methodology used to calculate the values previously listed in the TS. This arrangement would allow the actual values, previously listed in the TS, to be consistently reproduced and controlled. The TSTF Travelers modify the TS removing reference to specific documents and, in effect, allow reference to a range of methodologies represented by various Topical Report revisions. Reference to a specific revision of a methodology in the TS was deemed equivalent to listing a particular parameter in the TS that is calculated by the methodology.

Response: The NRC's staff position is that the use of the COLR and PTLR is only acceptable so long as the Administrative Controls provide a direct link to the specific methodology used to calculate the values and the values can be consistently reproduced and controlled. This staff position has no basis in fact. No such statements can be found in GL 88-16 or GL 96-03. The justification in GL 88-16 stated, "the specific values of these limits may be modified by licensees, without affecting nuclear safety, provided that these changes are determined using an NRC-approved methodology and consistent with all applicable limits of the plant safety analysis that are addressed in the Final Safety Analysis Report (FSAR)." The justification stated in GL 88-16 and GL 96-03 is that the changes are acceptable based on the use of NRC-approved methodologies and submittal of the COLRs and PTLRs.

In fact, the staff position in the November 2, 2009 letter is directly opposed to the original basis of TSTF-363, TSTF-408, and TSTF-419. The December 15, 1999 letter from the NRC to Siemens Power Corporation states the basis as, "this method of referencing topical reports would allow licensees to use current topical reports to support limits in the COLR without having to submit an amendment to the facility operating license every

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time the topical report is revised." The staff's position would specifically require submittal of an amendment every time the topical report is revised.

It appears the staff created a new basis for twenty-year-old allowances that is different from the basis described in the Generic Letters and the 85 plant-specific amendments. The staff has not provided any safety basis for this new position or provided examples of why the current basis is inadequate.

Issue 2: The guidance in GL 88-16 and GL 96-03 specify the inclusion of Topical Report number, title, or other NRC approval document, and date in the TS for those parameters relocated to the COLR/PTLR.

Response: The discussion and justification in GL 88-16 and GL 96-03 never discuss the inclusion of Topical Report numbers, titles, or other approval documents and dates in the TS. The only appearance of that information is in the model TS. The NRC staff has never been bound by model Technical Specifications provided in a Generic Letter. For example, the NUREG-1430 through -1434 Improved Standard Technical Specifications (ISTS) for the Core Operating Limits Report eliminates the GL 88-16 requirement to send the COLR to the Regional Administrator and Resident Inspector. The specific references to the COLR values in the ISTS are very different from the model Specifications provided in GL 88-16. Therefore, the appearance of the revision and date in the model TS in the Generic Letters is of no consequence.

Neither GL 88-16 or GL 96-03 have any regulatory authority on any licensee. Both Generic Letters were a voluntary improvements with no requirement to reply in accordance with 10 CFR 50.54(f). Licensee's adoption of the improvements described in the Generic Letters has been by plant-specific license amendment. Any subsequent approved license amendments that modify that adoption also become part of the plant's licensing basis. Therefore, the plant-specific amendments to adopt the COLR and the PTLR, and license amendments to adopt TSTF-363, TSTF-408, or TSTF-419 have equal regulatory authority.

In short, the justification in GL 88-16 and GL 96-03 did not rely on the inclusion of revision numbers and dates in the Technical Specifications. The Generic Letters found the COLR and PTLR acceptable because the licensee was required to use NRC-approved methodologies and to send the COLR and PTLR to the NRC.

Issue 3: The criterion contained in Title 10 of the Code of Federal Regulations Section 50.59(c)(2)(viii) allows licensees to use previously NRC-approved methodologies. This approach is not equivalent to listing a specific parameter in the TS.

Response: The NRC's evaluation for plant-specific adoption of TSTF-363 (which, as stated above, is the only applicable regulatory basis) specifically acknowledges that methodologies may be adopted under 10 CFR 50.59(c)(2)(viii). As stated in the Salem Safety Evaluation (attached):

*Since the COLR methods are described in the UFSAR, proposed changes to the methods (e.g., licensee desiring to use a newer NRC-approved revision of a*

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*topical report) would be subject to the provisions of 10 CFR 50.59. Specifically, 10 CFR 50.59(c)(2)(viii), requires that a licensee shall obtain a license amendment pursuant to 10 CFR 50.90, prior to implementing a proposed change, if the change would "[r]esult in a departure from a method of evaluation described in the Final Safety Analysis Report (as updated) used in establishing the design basis or in the safety analyses." The definition in 10 CFR 50.59(a)(2) states that departure from a method of evaluation described in the Final Safety Analysis Report (as updated) used in establishing the design basis or in the safety analyses means: (i) changing any of the elements of the method described in the FSAR unless the results of the analysis are conservative or essentially the same; or (ii) changing from a method described in the FSAR to another method unless that method has been approved by the NRC for the intended application.*

*Based on its review, the NRC staff finds that: (1) the proposed TS changes are consistent with TSTF-363; (2) the proposed amendment does not alter the current TS 6.9.1.9.b requirement that core operating limits be determined using analytical methods previously approved by the NRC; and (3) future revisions to the COLR, to use updated revisions of the referenced topical reports, will be adequately controlled under the provisions of 10 CFR 50.59. Based on these considerations, the NRC staff concludes that the proposed removal of revision numbers and dates from TS 6.9.1.9.b for Salem Units 1 and 2 are acceptable.*

The NRC staff's position has no basis in fact. Neither GL 88-16 nor GL 96-03 assumed that the approach was the equivalent of listing specific parameters in the TS. The Generic Letters only assumed that using NRC-approved methodologies would result in an acceptable parameter.

### Summary

The NRC staff position presented in the November 2, 2009 letter presents no valid basis for their objections to TSTF-363, TSTF-408, or TSTF-419. It attempts to rewrite history and apply new and unsubstantiated criteria to twenty-year old regulatory decisions and discounts the NRC's approval of 85 plant-specific changes.

The NRC's position in the November 2 letter is clearly a change in staff position as it reverses 20 years of practice implemented at 75 plants. Given that the Safety Evaluations for plant-specific adoption of TSTF-363 and TSTF-419 clearly approved the concept of relocating the methodology revision and dates to licensee control, imposing a different position - even for the addition of new methodologies - is a new staff position.

The NRC has imposed their new position on licensees. At least one licensee which had received approval of TSTF-363 has been told that an existing license amendment request to add additional methodologies must be revised to include the revision and date for the new methodologies. At least one licensee that had an amendment to adopt TSTF-363 under review prior to the November letter has been told that the amendment request will not be approved.

Application of the Backfit Rule

10 CFR 50.109(a)(1) defines "backfitting" as "the modification of or addition to systems, structures, components, or design of a facility; or the design approval or manufacturing license for a facility; or the procedures or organization required to design, construct or operate a facility; any of which may result from a new or amended provision in the Commission rules or the imposition of a regulatory staff position interpreting the Commission rules that is either new or different from a previously applicable staff position." Given the record presented above, the November 2 letter is clearly both "new" and "different from a previously applicable staff position."

The NRC staff may believe that the new staff position is needed to obtain compliance with 10 CFR 50.36. The industry does not believe the "compliance" provision in 10 CFR 50.109 is applicable. The 1985 Statement of Consideration for the 10 CFR 50.109 states "The compliance exception is intended to address situations in which the licensee has failed to meet known and established standards of the Commission because of omission or mistake of fact. It should be noted that new or modified interpretations of what constitutes compliance would not fall within the exception and would require a backfit analysis and application of the standard." Licensees are compliance with their licensing basis as approved in the NRC's license amendments, which determined that the changes were consistent with 10 CFR 50.36. Therefore, the compliance exception is not applicable.

NRC Management Directive 8.4, "Management of Facility-specific Backfitting and Information Collection," states "When the staff invokes a backfit exception, the appropriate office director or the regional administrator must provide a documented evaluation that includes a statement of the objectives, the reasons for the modification, and the basis for the backfit exception." To our knowledge, this has not been performed.

Should the staff wish to pursue this new regulatory position, it must be justified on a plant-specific basis under 10 CFR 50.109. The NRC staff is obligated under 50.109 to identify and evaluate backfits prior to imposition on licensees. Furthermore, the evaluation must find that imposing the new staff position on the licensee results in a "substantial increase in the overall protection of the public health and safety or the common defense and security to be derived from the backfit and that the direct and indirect costs of implementation for that facility are justified in view of this increased protection." The NRC staff has not demonstrated that adoption of TSTF-363, TSTF-408, or TSTF-419 have lessened protection of public health and safety or the common defense and security. The NRC staff also has not demonstrated that imposition of the new position would result in a "substantial increase in the overall protection of the public health and safety the common defense and security" or that the "direct and indirect costs....are justified."

Attachments:

1. Generic Letter 88-16, "Removal of Cycle-Specific Parameter Lists from Technical Specifications," October 4, 1988.

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2. Letter from Stewart A. Richards (NRC) to James F. Mallay (Siemens Power Corporation), "Acceptance for Siemens References to Approved Topical Reports in Technical Specifications," December 15, 1999.
3. TSTF-363-A, Revision 0, "Revise Topical Report references in ITS 5.6.5, COLR," April 13, 2000.
4. Letter from Drew G. Holland (NRC) to Jeffrey S. Forbes (Entergy Operations), "Arkansas Nuclear One, Unit 2 (ANO-2) Issuance of Amendment Re: License Amendment Request to Support Cycle 18 Core Reload," March 23, 2005.
5. Generic Letter 96-03, "Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits," January 31, 1996.
6. TSTF-408-A, Rev. 0, "Relocation of LTOP Enable Temperature and PORV Lift Setting to the PTLR ( CE NPSD-683)," May 24, 2001.
7. Letter from William D. Beckner (NRC) to Anthony R. Pietrangelo (NEI), dated September 6, 2002.
8. TSTF-419-A, "Revise PTLR Definition and References in ISTS 5.6.6, RCS PTLR," September 19, 2001.
9. Letter from William D. Beckner (NRC) to Anthony R. Pietrangelo (NEI), dated March 21, 2002.
10. Letter from Jack Donohew (NRC) to M. R. Blevins (TXU Power), "Comanche Peak Steam Electric Station, Units 1 And 2 - Issuance of Amendments Re: Revise Technical Specification 5.6.6 on Reactor Coolant System Pressure and Temperature Limits Report," February 22, 2007.
11. Letter from Stacey L. Rosenberg (NRC) to Technical Specifications Task Force, "Technical Specification Task Force (TSTF) Traveler 363, Revision 0, 'Revise Topical Report References in ITS 5.6.5, COLR'," dated November 2, 2009.
12. Letter from Stacey L. Rosenberg (NRC) to Technical Specifications Task Force, "Technical Specification Task Force (TSTF) Traveler TSTF-363, Revision 0, 'Revise Topical Report References in ITS 5.6.5, COLR'," dated December 11, 2009.
13. Letter from R. Ennis (NRC) to W. Levis (PSEG), "Salem Nuclear Generating Station, Unit Nos. 1 And 2, Issuance of Amendments Re: Topical Report References in Technical Specification for Core Operating Limits Report," August 23, 2007.