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Palo Verde Nuclear Generating Station **Dwight C. Mims**Senior Vice President
Nuclear Regulatory and Oversight

Tel. 623-393-5403 Fax 623-393-6077 Mail Station 7605 P. O. Box 52034 Phoenix, Arizona 85072-2034

102-06445-DCM/DFS November 22, 2011

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 for Amendment to Various Technical Specifications to

Implement Administrative Changes

Pursuant to 10 CFR 50.90, Arizona Public Service Company (APS) hereby requests to amend the Technical Specifications (TS) that are incorporated as Appendix A to the Renewed Operating License Nos. NPF-41, NPF-51, and NPF-74 for Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2, and 3, respectively. The proposed license amendment request (LAR) will make administrative and editorial changes to clarify and align the existing TSs.

The changes include corrective actions from the Unit 2 event described in Licensee Event Report (LER) 50-529/2011-001. The proposed changes are detailed in the enclosure to this letter.

Approval of the proposed amendment is requested by November 30, 2012. Once approved, the amendment shall be implemented within 90 days. No commitments are being made to the NRC by this letter.

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).

Should you need further information regarding this LAR, please contact Russell A. Stroud, Licensing Section Leader, at (623) 393-5111.

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U.S. Nuclear Regulatory Commission

Request for Amendment to Various Technical Specifications to Implement

Administrative Changes

Page 2

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

Executed on <u>NOVEMBER 22,201</u>)
(Date)

Sincerely,

DCM/RAS/DFS/gat

Enclosure: Evaluation of the Proposed Change

cc: E. E. Collins, Jr. NRC Region IV Regional Administrator

B. K. Singal NRC NRR Project Manager for PVNGS

L. K. Gibson NRC NRR Project Manager

J. R. Hall NRC NRR Senior Project Manager

M. A. Brown
A. V. Godwin
T. Morales

NRC Senior Resident Inspector for PVNGS
Arizona Radiation Regulatory Agency (ARRA)
Arizona Radiation Regulatory Agency (ARRA)

ENCLOSURE

Evaluation of the Proposed Change

Subject	: Request for Amendment to Various Technical Specifications to Implement Administrative Changes
10 0	CHAMA DV DECODIDTION

- 1.0 SUMMARY DESCRIPTION
- 2.0 **DETAILED DESCRIPTION**
- **TECHNICAL EVALUATION** 3.0
- **REGULATORY EVALUATION** 4.0
 - 4.1 Applicable Regulatory Requirements/Criteria
 - 4.2 No Significant Hazards Consideration Determination
 - 4.3 Conclusions
- 5.0 **ENVIRONMENTAL CONSIDERATION**
- 6.0 **REFERENCES**

ATTACHMENTS:

- 1. **Technical Specification Page Markups**
- 2. **Retyped Technical Specification Pages**

1.0 SUMMARY DESCRIPTION

Pursuant to 10 CFR 50.90, Arizona Public Service Company (APS) hereby requests to amend the Technical Specifications (TS) that are incorporated as Appendix A to the Renewed Operating License Nos. NPF-41, NPF-51, and NPF-74 for Palo Verde Nuclear Generating Station (PVNGS) Units 1, 2, and 3, respectively. The proposed license amendment request (LAR) will make administrative and editorial changes to clarify and align the existing TSs.

The proposed changes are administrative or editorial, and will not result in any change to operating requirements. The proposed changes remove duplicate TS requirements and unit specific references that are no longer needed. In addition, the proposed administrative changes correct typographical errors and provide clarification to ensure understanding of the required actions of some TSs. The changes include corrective actions from the Unit 2 event described in Licensee Event Report (LER) 50-529/2011-001. These administrative changes are proposed for the following Technical Specifications (TS):

- TS 3.3.1 "Reactor Protective System (RPS) Instrumentation Operating"
- TS 3.3.2 "Reactor Protective System (RPS) Instrumentation Shutdown"
- TS 3.3.5 "Engineered Safety Features Actuation System (ESFAS) Instrumentation"
- TS 3.5.5 "Refueling Water Tank (RWT)"
- TS 3.3.9 "Control Room Essential Filtration Actuation Signal (CREFAS)"
- TS 3.7.11 "Control Room Essential Filtration System (CREFS)"
- TS 5.4 "Procedures"
- TS 5.5.16 "Containment Leakage Rate Testing Program"

2.0 DETAILED DESCRIPTION

The following changes are proposed:

- TS 3.3.1 "Reactor Protective System (RPS) Instrumentation Operating"
 - In Table 3.3.1-1 "Reactor Protective System Instrumentation," for Functions 6 and 7 delete reference to "3990 MWt RTP" from the "Allowable Value" column.
- TS 3.3.2 "Reactor Protective System (RPS) Instrumentation Shutdown"
 - In Table 3.3.2-1 "Reactor Protective System Instrumentation Shutdown," for Functions 2 and 3 delete reference to "3990 MWt RTP" from the "Allowable Value" column.

TS 3.3.5 "Engineered Safety Features Actuation System (ESFAS) Instrumentation"

In Table 3.3.5-1 "Engineered Safety Features Actuation System Instrumentation," for Functions 4a and 4b delete reference to "3990 MWt RTP" from the "Allowable Value" column.

The references to "3990 MWt RTP" in the tables above are no longer needed and can be removed as a result of the completion of the Power Uprate in all three PVNGS units. Deletion of these references removes unnecessary detail.

TS 3.3.5 "Engineered Safety Features Actuation System (ESFAS) Instrumentation"

Delete the "Pre-RWT TS Setpoint Change" (page 3.3.5-4) version of Table 3.3.5-1 "Engineered Safety Features Actuation System Instrumentation," and remove the words "After RWT TS Setpoint Change," from remaining version of Table 3.3.5-1 (page 3.3.5-5). This will include renumbering the TS pages.

As provided in approved License Amendment 182 (Reference 6.1), the changes to the RWT level setpoints were to be implemented as the supporting modifications in each PVNGS units were completed. These modifications have been completed and the "After RWT TS Setpoint Change" Function 5a values are now fully implemented in Units 1, 2, and 3. As a result, the "Pre-RWT TS Setpoint Change" version of the table is no longer needed and can be removed.

TS 3.3.9 "Control Room Essential Filtration Actuation Signal (CREFAS)"

Revise the Required Actions A.1 and C.1 from "Place one CREFS train in operation," to "Place one CREFS train in essential filtration mode."

This revision is to clarify the Required Actions and to ensure complete understanding of the configuration necessary to meet those Actions. The change is a corrective action from the Unit 2 event described in LER 50-529/2011-001.

TS 3.5.5 "Refueling Water Tank (RWT)"

Delete the "Pre-RWT TS Setpoint Change" (page 3.5.5-3) version of Figure 3.5.5-1 Minimum Required RWT Volume and remove the words "After RWT TS Setpoint Change," from remaining version of Figure 3.5.5-1 (page 3.3.5-4). This will include renumbering the remaining TS page.

As provided in approved License Amendment 182, the changes to the RWT level setpoints were to be implemented as the supporting modifications in each PVNGS units were completed. These modifications have been completed and the "After RWT TS Setpoint Change" minimum required RWT values are now fully implemented in Units 1, 2, and 3. As a result, the "Pre-RWT TS Setpoint Change" version of the figure is no longer needed and can be removed.

TS 3.7.11 "Control Room Essential Filtration System (CREFS)"

Revise the Required Actions D.1 and E.1 from "Place OPERABLE CREFS train in operation," to "Place OPERABLE CREFS train in essential filtration mode."

This revision is to clarify the Required Actions and to ensure complete understanding of the configuration necessary to meet those Actions. The change is a corrective action from the Unit 2 event described in LER 50-529/2011-001.

TS 5.4 "Procedures"

In the second paragraph in TS 5.4.1.f, add an open quotation mark preceding the words *Software Program Manual for Common Q Systems*, and move the comma trailing these words inside the closed quotation mark.

This is correcting typographical errors.

TS 5.5.16 "Containment Leakage Rate Testing Program"

Revise TS 5.5.16.b to remove historical data on the calculated containment internal pressures (P_a) for each of the PVNGS units and confirm that the current (P_a) for all three units is 58.0 psig.

This change is editorial and removes historical information that is confusing and unnecessary.

3.0 TECHNICAL EVALUATION

The proposed changes to the TSs are administrative and editorial and do not affect how plant equipment is operated or maintained. No changes to the physical plant or analytical methods are proposed and there are no impacts to the PVNGS Updated Final Safety Analysis Report (UFSAR) accident analysis.

List of Proposed Administrative Changes

Proposed Change	Justification	Technical Specification Sections
Remove reference to 3990 megawatts thermal (MWt).	Removes historical information no longer required (reference Facility Operating License Amendment 157).	3.3.1, 3.3.2, and 3.3.5
Delete the "Pre-RWT TS Setpoint Change" version of Table 3.3.5-1 and remove the words "After RWT TS Setpoint Change," from remaining version of Table 3.3.5-1.	The RWT setpoint changes in License Amendment 182 have been implemented in all three PVNGS units. As a result, the Pre- RWT TS Setpoint Change information is no longer needed and can be removed.	3.3.5

Enclosure Evaluation of the Proposed Change

Proposed Change	Justification	Technical
		Specification Sections
Revise the TS 3.3.9, Required Actions A.1 and C.1 to "Place one CREFS train in essential filtration mode."	This revision is to clarify the Required Actions and to ensure complete understanding of the configuration necessary to meet those actions. This clarification uses more precise language to ensure consistency with the PVNGS design and licensing basis. TS 3.3.9 Bases reflect that the essential filtration mode is the equivalent to the emergency mode as provided in NUREG-1432, Revision 3 (Reference 6.2) and ensures that the alignment of the CREFS will mitigate a design basis accident.	3.3.9
Delete the "Pre-RWT TS Setpoint Change" version of Figure 3.5.5-1 and remove the words "After RWT TS Setpoint Change," from remaining version of Figure 3.5.5 -1.	The RWT setpoint changes in License Amendment 182 have been implemented in all three PVNGS units. As a result, the Pre-RWT TS Setpoint Change information is no longer needed and can be removed.	3.5.5
Revise the TS 3.7.11 Required Actions D.1 and E.1 to "Place OPERABLE CREFS train in essential filtration mode."	This revision is to clarify the Required Actions and to ensure complete understanding of the configuration necessary to meet those actions. This clarification uses more precise language to ensure consistency with the PVNGS design and licensing basis. TS 3.7.11 Bases reflect that the essential filtration mode is the equivalent to the emergency mode as provided in NUREG-1432, Revision 3 (Reference 6.2) and ensures that the alignment of the CREFS will mitigate a design basis accident.	3.7.11
TS 5.4.1.f, add an open quotation mark preceding the words Software Program Manual for Common Q Systems, and move the comma trailing these words inside the closed quotation mark.	Correction of typographical errors.	5.4.1.f
Revise TS 5.5.16.b to reflect the current (P _a) for each unit being 58.0 psig.	Removes historical information no longer required (reference Facility Operating License Amendment 157).	5.5.16

4.0 REGULATORY EVALUATION

4.1 Applicable Regulatory Requirements/Criteria

The proposed changes to the TSs are administrative and editorial, and do not affect any regulatory requirements or criteria. These changes do not affect how plant equipment is operated or maintained and there are no changes to the physical plant or analytical methods. As a result, there are no impacts to the PVNGS UFSAR accident analysis.

4.2 No Significant Hazards Consideration Determination

The proposed changes are administrative and editorial, and do not modify the existing licensing basis or operating requirements. The proposed changes remove technical specification (TS) requirements and unit specific references that are no longer required. In addition, the proposed administrative changes address some typographical errors and provide clarification to ensure understanding of the required actions of some TSs. The proposed amendment includes the following changes that are considered to be administrative and editorial changes:

- TS 3.3.1 "Reactor Protective System (RPS) Instrumentation Operating," Table 3.3.1-1, Functions 6 and 7 delete reference to "3990 MWt RTP."
- TS 3.3.2 "Reactor Protective System (RPS) Instrumentation Shutdown," Table 3.3.2-1, Functions 2 and 3 delete reference to "3990 MWt RTP."
- TS 3.3.5 "Engineered Safety Features Actuation System (ESFAS) Instrumentation,"
 Table 3.3.5-1, Functions 4a and 4b delete reference to "3990 MWt RTP."
- TS 3.3.5 "Engineered Safety Features Actuation System (ESFAS) Instrumentation," delete the "Pre-RWT TS Setpoint Change" version of Table 3.3.5-1 and remove the words "After RWT TS Setpoint Change," from remaining version of Table 3.3.5-1.
- TS 3.3.9 "Control Room Essential Filtration Actuation Signal (CREFAS)," revise Required Actions A.1 and C.1 to "Place one CREFS train in essential filtration mode."
- TS 3.5.5 "Refueling Water Tank (RWT)," delete the "Pre-RWT TS Setpoint Change" version of Figure 3.5.5-1 and remove the words "After RWT TS Setpoint Change," from remaining version of Figure 3.5.5-1.
- TS 3.7.11 "Control Room Essential Filtration System (CREFS)," revise the Required Actions D.1 and E.1 to "Place OPERABLE CREFS train in essential filtration mode."
- TS 5.4 "Procedures," typographical correction to add an open quotation mark and move the comma.
- TS 5.5.16 "Containment Leakage Rate Testing Program," remove historical data on the calculated containment internal pressures (P_a) for each of the PVNGS Units and confirm that the current (P_a) for all three units is 58.0 psig.

Arizona Public Service (APS) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

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

Response: No.

The proposed amendment involves administrative and editorial changes. The proposed amendment does not impact any accident initiators, analyzed events, or assumed mitigation of accident or transient events. The proposed changes do not involve the addition or removal of any equipment or any design changes to the facility. The proposed changes do not affect any plant operations, design function, or analysis that verifies the capability of structures, systems, and components (SSCs) to perform a design function. The proposed changes do not change any of the accidents previously evaluated in the UFSAR. The proposed changes do not affect SSCs, operating procedures, and administrative controls that have the function of preventing or mitigating any of these accidents.

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

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

Response: No

The proposed amendment involves administrative and editorial changes. No actual plant equipment or accident analyses will be affected by the proposed changes. The proposed changes will not change the design function or operation of any SSCs. The proposed changes will not result in any new failure mechanisms, malfunctions, or accident initiators not considered in the design and licensing basis. The proposed amendment does not impact any accident initiators, analyzed events, or assumed mitigation of accident or transient events.

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

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

Response: No

The proposed amendment involves administrative and editorial changes. The proposed changes do not involve any physical changes to the plant or alter the manner in which plant systems are operated, maintained, modified, tested, or inspected. The proposed changes do not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The safety analysis acceptance criteria are not affected by the changes. The proposed changes will not result in plant operation in a configuration outside the

Evaluation of the Proposed Change

design basis. The proposed changes do not adversely affect systems that respond to safely shut down the plant and to maintain the plant in a safe shutdown condition.

Therefore, the proposed changes do 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.

4.3 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed administrative and editorial changes will not revise a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or change an inspection or surveillance requirement. 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.

6.0 REFERENCES

- Amendment No. 182 to Facility Operating License No. NPF-41, Amendment No. 182 to Facility Operating License No. NPF-51, and Amendment No. 182 to Facility Operating License No. NPF-74 for Palo Verde, Units 1, 2, and 3, respectively, dated November 24, 2010 (ADAMS Accession No. ML 102710312)
- 6.2 NUREG-1432, Standard Technical Specifications Combustion Engineering Plants, Volume 1, Revision 3.0, June 2004

ATTACHMENT 1

Technical Specification Page Markups

Pages:

3.3.1-7

3.3.2-5

3.3.5-4 (Deleted)

3.3.5-5

3.3.9-1

3.3.9-2

3.5.5-3 (Deleted)

3.5.5-4

3.7.11-2

5.4-1

5.5-16

Table 3.3.1-1 (page 1 of 3) Reactor Protective System Instrumentation ${\bf r}$

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1.	Variable Over Power	1.2	SR 3.3.1.1 SR 3.3.1.4 SR 3.3.1.6 SR 3.3.1.7 SR 3.3.1.8 SR 3.3.1.9 SR 3.3.1.13	Ceiling ≤ 111.0% RTP Band ≤ 9.9% RTP Incr. Rate ≤ 11.0%/min RTP Decr. Rate > 5%/sec RTP
2.	Logarithmic Power Level — High ^(a)	2	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.9 SR 3.3.1.12 SR 3.3.1.13	≤ 0.011% NRTP
3.	Pressurizer Pressure – High	1.2	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.9 SR 3.3.1.13	≤ 2388 psia
4.	Pressurizer Pressure – Low	1.2	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.9 SR 3.3.1.12 SR 3.3.1.13	≥ 1821 psia
5.	Containment Pressure - High	1.2	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.9 SR 3.3.1.13	≤ 3.2 psig
6.	Steam Generator #1 Pressure — Low	1,2	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.9 SR 3.3.1.13	<u>3990 NWt RTP:</u> ≥ 955 psia ^(aa)
7.	Steam Generator #2 Pressure — Low	1.2	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.9 SR 3.3.1.13	3990 MWt RTP:- ≥ 955 psia ^(aa)

⁽a) Trip may be bypassed when logarithmic power is > 1E-4% NRTP. Bypass shall be automatically removed when logarithmic power is \leq 1E-4% NRTP.

⁽aa) 1. If the as-found channel setpoint is conservative with respect to the Allowable Value but outside its predetermined as-found acceptance criteria band, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service. If the as-found instrument channel setpoint is not conservative with respect to the Allowable Value, the channel shall be declared inoperable.

^{2.} The instrument channel setpoint shall be reset to a value that is within the as-left tolerance of the UFSAR Trip Setpoint, or within the as left tolerance of a setpoint that is more conservative than the UFSAR Trip Set Point: otherwise the channel shall be declared inoperable. The UFSAR Trip Setpoint and the methodology used to determine 1) the UFSAR Trip Setpoint, 2) the predetermined as found acceptance criteria band, and 3) the as-left setpoint tolerance band are specified in the UFSAR.

Table 3.3.2-1
Reactor Protective System Instrumentation - Shutdown

	FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALVE
1.	Logarithmic Power Level-High ^(d)	3 ^(a) . 4 ^(a) . 5 ^(a)	SR 3.3.2.1 SR 3.3.2.2 SR 3.3.2.3 SR 3.3.2.4 SR 3.3.2.5	≤ 0.011% NRTP ^(c)
2.	Steam Generator #1 Pressure-Low ^(b)	3 ^(a)	SR 3.3.2.1 SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.5	3990 MWt RTP: ≥ 955 psia ^{(e}
3.	Steam Generator #2 Pressure-Low ^(b)	3 ^(a)	SR 3.3.2.1 SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.5	3990 Nwt RT2 ≥ 955 psia'↔

- (a) With any Reactor Trip Circuit Breakers (RTCBs) closed and any control element assembly capable of being withdrawn.
- (b) The setpoint may be decreased as steam pressure is reduced, provided the margin between steam pressure and the setpoint is maintained ≤ 200 psig. The setpoint shall be automatically increased to the normal setpoint as steam pressure is increased.
- (c) The setpoint must be reduced to \leq 1E-4% NRTP when less than 4 RCPs are running.
- (d) Trip may be bypassed when logarithmic power is > 1E-4% NRTP. Bypass shall be automatically removed when logarithmic power is $\leq 1E-4\%$ NRTP.
- (e) 1. If the as-found channel setpoint is conservative with respect to the Allowable Value but outside its predetermined as-found acceptance criteria band, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service. If the as-found instrument channel setpoint is not conservative with respect to the Allowable Value, the channel shall be declared inoperable.
 - 2. The instrument channel setpoint shall be reset to a value that is within the as-left tolerance of the UFSAR Trip Setpoint, or within the as left tolerance of a setpoint that is more conservative than the UFSAR Trip Set Point; otherwise the channel shall be declared inoperable. The UFSAR Trip Setpoint and the methodology used to determine 1) the UFSAR Trip Setpoint, 2) the predetermined as found acceptance criteria band, and 3) the as-left setpoint tolerance band are specified in the UFSAR.

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	ALLOWABLE VALUE
1. Safety Injection Actuation Signal		
a. Containment Pressure — High b. Pressurizer Pressure — Low ^(a)	1.2.3	≤ 3.2 psig ≥1821 psia
2. Containment Spray Actuation Signal		
a. Containment Pressure — High High	1,2,3	≤ 8.9 psig
3. Containment Isolation Actuation Signal		
a. Containment Pressure — High b. Pressurizer Pressure — Low(a)	1.2.3	≤ 3.2 psig ≥ 1821 psia
4. Main Steam Isolation Signal(c)		
a. Steam Generator #1 Pressure—Low ^(b)	1,2.3	3990 Mwit RTP: ≥ 955 psia ^(a)
<pre>b. Steam Generator #2 Pressure—Low(b)</pre>		3990 MWt RTP: ≥ 955 psia ^(d)
c. Steam Generator #1 Level-Highd. Steam Generator #2 Level-Highe. Containment Pressure-High		≤ 91.5% ≤ 91.5% ≤ 3.2 psig
5. Recirculation Actuation Signal		
a. Refueling Water Storage Tank Level-Low	1,2.3	\geq 9.15 and \leq 9.65% ^(d)
 Auxiliary Feedwater Actuation Signal SG #1 (AFAS-1) 		
a. Steam Generator #1 Level—Low b. SG Pressure Difference—High	1.2.3	≥ 25.3% ≤ 192 psid
 Auxiliary Feedwater Actuation Signal SG #2 (AFAS-2) 		
a. Steam Generator #2 Level-Lowb. SG Pressure Difference-High	1.2.3	≥ 25.3% ≤ 192 psid

- (a) The setpoint may be decreased to a minimum value of 100 psia. as pressurizer pressure is reduced, provided the margin between pressurizer pressure and the setpoint is maintained ≤ 400 psia or ≥ 140 psia greater than the saturation pressure of the RCS cold leg when the RCS cold leg temperature is ≥ 485°F. Trips may be bypassed when pressurizer pressure is < 400 psia. Bypass shall be automatically removed when pressurizer pressure is ≥ 500 psia. The setpoint shall be automatically increased to the normal setpoint as pressurizer pressure is increased.
- (b) The setpoint may be decreased as steam pressure is reduced, provided the margin between steam pressure and the setpoint is maintained ≤ 200 psig. The setpoint shall be automatically increased to the normal setpoint as steam pressure is increased.
- (c) The Main Steam Isolation Signal (MSIS) Function (Steam Generator Pressure Low, Steam Generator Level-High and Containment Pressure — High signals) is not required to be OPERABLE when all associated valves isolated by the MSIS Function are closed.
- (d) 1. If the as-found channel setpoint is conservative with respect to the Allowable Value but outside its predetermined as-found acceptance criteria band, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service. If the as-found instrument channel setpoint is not conservative with respect to the Allowable Value, the channel shall be declared inoperable.
 - 2. The instrument channel setpoint shall be reset to a value that is within the as-left tolerance of the UFSAR Trip Setpoint, or within the as left tolerance of a setpoint that is more conservative than the UFSAR Trip Set Point; otherwise the channel shall be declared inoperable. The UFSAR Trip Setpoint and the methodology used to determine 1) the UFSAR Trip Setpoint, 2) the predetermined as found acceptance criteria band, and 3) the as-left setpoint tolerance band are specified in the UFSAR.

Delete Page

Table 3.3.5-1 (page 1 of 1)
Engineered Safety Features Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	ALLOWABLE VALUE
1. Safety-Injection Actuation Signal		
a. Containment Pressure — High b. Pressurizer Pressure — Low ^(a)	1.2.3	<u>≤ 3.2 psig</u> ≥ 1821 psia
2. Containment Spray Actuation Signal		
a. Containment Pressure - High High	1,2,3	≤ 8.9 psig
3. Containment Isolation Actuation Signal		
a. Containment Pressure High b. Pressurizer Pressure Low(a)	1.2.3	<u>≤ 3.2 psig</u> ≥ 1821 psia
4. Main Steam Isolation Signal(C)		
a. Steam Generator #1 Pressure Low(D)	1.2,3	3990 MWt RTP: ≥ 955 psia ^{cc:}
b. Steam Generator #2 Pressure Low ^(b)		3990 MWt RTP: ≥ 955 psia [™]
<pre>c. Steam Generator #1 Level-High d. Steam Generator #2 Level-High e. Containment Pressure-High</pre>		<u>< 91.5%</u> ≤ 91.5% ≤ 3.2 psig
5. Recirculation Actuation Signal		
a. Refueling Water Storage Tank Level Low	1.2.3	\geq 6.9 and \leq 7.9%
6. Auxiliary Feedwater Actuation Signal SG #1 (AFAS-1)		
a. Steam Generator #1 Level-Low b. SG Pressure Difference High	1.2,3	≥ 25.3% ≤ 192 psid
7. Auxiliary Feedwater Actuation Signal SG #2 (AFAS-2)		
a. Steam Generator #2 Level-Low b. SG Pressure Difference High	1.2.3	<u>≥ 25.3°</u> ≤ 192 ps₁d

ta) The setpoint may be decreased to a minimum value of 100 psia, as pressurizer pressure is reduced, provided the margin between pressurizer pressure and the setpoint is maintained < 400 psia or > 140 psia greater than the saturation pressure of the RCS cold leg when the RCS cold leg temperature is > 485°F. Trips may be bypassed when pressurizer pressure is < 400 psia. Bypass shall be automatically removed when pressurizer pressure is > 500 psia. The setpoint shall be automatically increased to the normal setpoint as pressurizer pressure is increased.

⁽b) The setpoint may be decreased as steam pressure is reduced, provided the margin between steam pressure and the setpoint is maintained ≤ 200 psig. The setpoint shall be automatically increased to the normal setpoint as steam pressure is increased.

⁽c) The Main Steam Isolation Signal (MSIS) Function (Steam Generator Pressure - Low, Steam Generator Level-High and Containment Pressure - High signals) is not required to be OPERABLE when all associated valves isolated by the MSIS Function are closed.

⁽d) 1. If the as found channel setpoint is conservative with respect to the Allowable Value but outside its predetermined as found acceptance criteria band, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service. If the as-found instrument channel setpoint is not conservative with respect to the Allowable Value, the channel shall be declared inoperable.

^{2.} The instrument channel setpoint shall be reset to a value that is within the as-left tolerance of the UFSAR Trip Setpoint, or within the as-left tolerance of a setpoint that is more conservative than the UFSAR Trip Set Point: otherwise the channel shall be declared inoperable. The UFSAR Trip Setpoint and the methodology used to determine 1) the UFSAR Trip Setpoint, 2) the predetermined as found acceptance criteria band, and 3) the as-left setpoint tolerance band are specified in the UFSAR.

3.3 INSTRUMENTATION

3.3.9 Control Room Essential Filtration Actuation Signal (CREFAS)

LCO 3.3.9

One CREFAS channel shall be OPERABLE.

APPLICABILITY:

MODES 1, 2, 3, 4, 5, and 6, During movement of irradiated fuel assemblies.

ACTIONS

	TONS			
CONDITION		REQUIRED ACTION		COMPLETION TIME
Α.	CREFAS Manual Trip, Actuation Logic, or radiation monitor inoperable in MODE 1, 2, 3, or 4.	A.1	Place one CREFS train in <u>essential filtration</u> <u>modeoperation</u> .	1 hour
В.	Required Action and associated Completion Time of Condition A	B.1 AND	Be in MODE 3.	6 hours
	not met.	B.2	Be in MODE 5.	36 hours

ACTIONS (continued)

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. CREFAS Manual Trip, Actuation Logic, or radiation monitor inoperable in MODE 5 or 6, or during	C.1	Place one CREFS train in essential filtration modeoperation.	Immediately
movement of irradiated fuel assemblies.	C.2.1	Suspend movement of irradiated fuel assemblies.	Immediately
	AND		
	C.2.2	Suspend positive reactivity additions.	Immediately
	<u>ANC</u>)	
	C.2.3	Suspend CORE ALTERATIONS.	Immediately

SURVEILLANCE REQUIREMENTS

	FREQUENCY	
SR 3.3.9.1	Perform a CHANNEL CHECK on the required control room radiation monitor channel.	12 hours

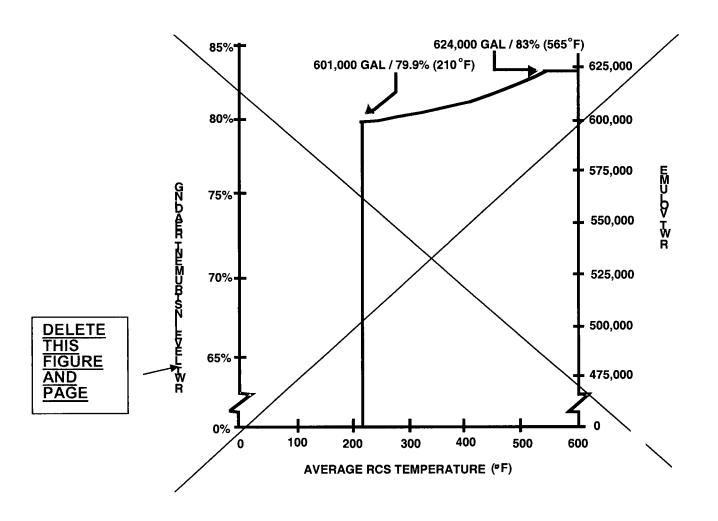


FIGURE 3.5.5-1
Minimum Required RWT Volume

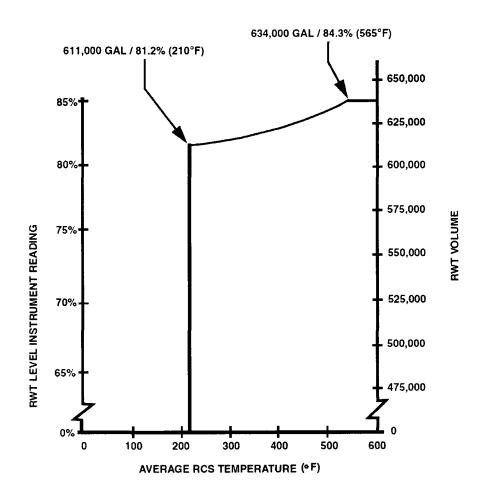


FIGURE 3.5.5-1 Minimum Required RWT Volume

ACTIONS (continued)

<u> </u>	ACTIONS (continued)				
	CONDITION		REQUIRED ACTION	COMPLETION TIME	
С.	Required Action and associated Completion	C.1	Be in MODE 3.	6 hours	
	Time of Condition A or B not met in MODE 1, 2, 3, or 4.	<u>AND</u> C.2	Be in MODE 5.	36 hours	
D.	Required Action and associated Completion Time of Condition A not met in MODE 5 or 6.	D.1	Place OPERABLE CREFS train in essential filtration modeoperation.	Immediately	
Ε.	Required Action and associated Completion Time of Condition A not met during movement of	E.1	Place OPERABLE CREFS Train in essential filtration mode operation.	Immediately	
	irradiated fuel assemblies.	<u>OR</u>		Immediately	
		E.2	Suspend movement of irradiated fuel assemblies.	Immediately	
F.	Two CREFS trains inoperable in MODE 5 or 6, or during movement of	F.1	Suspend CORE ALTERATIONS.	Immediately	
	irradiated fuel assemblies.	AND			
<u>OR</u>					
	One or more CREFS trains inoperable due to inoperable CRE boundary in MODE 5 or 6, or during movement of irradiated fuel assemblies.	F.2	Suspend movement of irradiated fuel assemblies.	Immediately	
G.	Two CREFS trains inoperable in MODE 1, 2, 3, or 4, for reasons other than Condition B.	G.1	Enter LCO 3.0.3.	Immediately	

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.
 - f. Modification of core protection calculator (CPC) addressable constants. These procedures shall include provisions to ensure that sufficient margin is maintained in CPC type I addressable constants to avoid excessive operator interaction with CPCs during reactor operation.

Modifications to the CPC software (including changes of algorithms and fuel cycle specific data) shall be performed in accordance with the most recent version of the "Software Program Manual for Common Q Systems,"— CE-CES-195, which has been determined to be applicable to the facility. Additions or deletions to CPC addressable constants or changes to addressable constant software limit values shall not be implemented without prior NRC approval.

5.5.16 Containment Leakage Rate Testing Program (continued)

- 3. The first Type A test performed after the Unit 1 November 1999 Type A test shall be prior to November 4, 2014.
- 4. The first Type A test performed after the Unit 2 November 2000 Type A test shall be prior to November 2, 2015.
- 5. The first Type A test performed after the Unit 3 April 2000 Type A test shall be prior to April 27, 2015.
- b. The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a , is 52.0 psig for Unit 1 through operating cycle 12 and Unit 3 through operating cycle 13. and 58.0 psig for Unit 1 after operating cycle 12. Unit 2, and Unit 3 after operating cycle 13. The containment design pressure is 60 psig.
- c. The maximum allowable containment leakage rate, L_a , at P_a , shall be 0.1 % 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 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 ≥ 14.5 psig.
- e. The provisions of SR 3.0.2 do not apply to the test frequencies in the Containment Leakage Rate Testing Program.
- f. The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

ATTACHMENT 2

Retyped Technical Specification Pages

Pages: 3.3.1-7

3.3.2-5

3.3.5-4

3.3.9-1

3.3.9-2

3.5.5-3

3.7.11-2

5.4-1

5.5-16

Table 3.3.1-1 (page 1 of 3)
Reactor Protective System Instrumentation

		APPLICABLE MODES OR OTHER SPECIFIED	SURVEILLANCE	
	FUNCTION	CONDITIONS	REQUIREMENTS	ALLOWABLE VALUE
1.	Variable Over Power	1.2	SR 3.3.1.1 SR 3.3.1.4 SR 3.3.1.6 SR 3.3.1.7 SR 3.3.1.8 SR 3.3.1.9 SR 3.3.1.13	Ceiling ≤ 111.0% RTP Band ≤ 9.9% RTP Incr. Rate ≤ 11.0%/min RTP Decr. Rate > 5%/sec RTP
2.	Logarithmıc Power Level — High(a)	2	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.9 SR 3.3.1.12 SR 3.3.1.13	≤ 0.011% NRTP
3.	Pressurizer Pressure - High	1.2	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.9 SR 3.3.1.13	≤ 2388 psia
4.	Pressurizer Pressure – Low	1.2	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.9 SR 3.3.1.12 SR 3.3.1.13	≥ 1821 psīa
5.	Containment Pressure — High	1.2	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.9 SR 3.3.1.13	≤ 3.2 psig
6.	Steam Generator #1 Pressure — Low	1,2	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.9 SR 3.3.1.13	≥ 955 psia ^{taai}
7.	Steam Generator #2 Pressure — Low	1.2	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.9 SR 3.3.1.13	≥ 955 psia ^(aa)

⁽a) Trip may be bypassed when logarithmic power is > 1E-4% NRTP. Bypass shall be automatically removed when logarithmic power is \leq 1E-4% NRTP.

⁽aa) 1. If the as-found channel setpoint is conservative with respect to the Allowable Value but outside its predetermined as-found acceptance criteria band, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service. If the as-found instrument channel setpoint is not conservative with respect to the Allowable Value, the channel shall be declared inoperable.

^{2.} The instrument channel setpoint shall be reset to a value that is within the as-left tolerance of the UFSAR Trip Setpoint, or within the as left tolerance of a setpoint that is more conservative than the UFSAR Trip Set Point; otherwise the channel shall be declared inoperable. The UFSAR Trip Setpoint and the methodology used to determine 1) the UFSAR Trip Setpoint, 2) the predetermined as found acceptance criteria band, and 3) the as-left setpoint tolerance band are specified in the UFSAR.

Table 3.3.2-1 Reactor Protective System Instrumentation - Shutdown

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALVE
. Logarithmic Power Level-High ^(d)	3 ^(a) . 4 ^(a) . 5 ^(a)	SR 3.3.2.1 SR 3.3.2.2 SR 3.3.2.3 SR 3.3.2.4 SR 3.3.2.5	≤ 0.011% NRTP ^(c)
. Steam Generator #1 Pressure-Low ^(b)	3 ^(a)	SR 3.3.2.1 SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.5	≥955 psia ^(e)
. Steam Generator #2 Pressure-Low ^(b)	3 ^(a)	SR 3.3.2.1 SR 3.3.2.2 SR 3.3.2.4 SR 3.3.2.5	≥955 psia ^{re} '

- (a) With any Reactor Trip Circuit Breakers (RTCBs) closed and any control element assembly capable of being withdrawn.
- (b) The setpoint may be decreased as steam pressure is reduced, provided the margin between steam pressure and the setpoint is maintained ≤ 200 psig. The setpoint shall be automatically increased to the normal setpoint as steam pressure is increased.
- (c) The setpoint must be reduced to \leq 1E-4% NRTP when less than 4 RCPs are running.
- (d) Trip may be bypassed when logarithmic power is > 1E-4% NRTP. Bypass shall be automatically removed when logarithmic power is \leq 1E-4% NRTP.
- (e) 1. If the as-found channel setpoint is conservative with respect to the Allowable Value but outside its predetermined as-found acceptance criteria band, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service. If the as-found instrument channel setpoint is not conservative with respect to the Allowable Value, the channel shall be declared inoperable.
 - 2. The instrument channel setpoint shall be reset to a value that is within the as-left tolerance of the UFSAR Trip Setpoint, or within the as left tolerance of a setpoint that is more conservative than the UFSAR Trip Set Point: otherwise the channel shall be declared inoperable. The UFSAR Trip Setpoint and the methodology used to determine 1) the UFSAR Trip Setpoint, 2) the predetermined as found acceptance criteria band, and 3) the as-left setpoint tolerance band are specified in the UFSAR.

Table 3.3.5-1 (page 1 of 1) Engineered Safety Features Actuation System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED	ALLOHADI E VALUE
FUNCTION	CONDITIONS	ALLOWABLE VALUE
1. Safety Injection Actuation Signal		
a. Containment Pressure – High b. Pressurizer Pressure – Low ^(a)	1.2.3	≤ 3.2 psig ≥1821 psia
2. Containment Spray Actuation Signal		
a. Containment Pressure — High High	1,2,3	≤ 8.9 psig
3. Containment Isolation Actuation Signal		
a. Containment Pressure – High b. Pressurizer Pressure – Low ⁽ a)	1.2.3	≤ 3.2 psig ≥ 1821 psia
4. Main Steam Isolation Signal ^(c)		
a. Steam Generator #1 Pressure—Low ^(b)	1.2.3	≥ 955 psia ^(d)
b. Steam Generator #2 Pressure—Low ^(b)		≥ 955 psia ^(d)
c. Steam Generator #1 Level-Highd. Steam Generator #2 Level-Highe. Containment Pressure-High		≤ 91.5% ≤ 91.5% ≤ 3.2 psig
5. Recirculation Actuation Signal		
a. Refueling Water Storage Tank Level-Low	1.2.3	\geq 9.15 and \leq 9.65% ^(d)
 Auxiliary Feedwater Actuation Signal SG #1 (AFAS-1) 		
a. Steam Generator #1 Level-Lowb. SG Pressure Difference-High	1.2.3	≥ 25.3% ≤ 192 psid
 Auxiliary Feedwater Actuation Signal SG #2 (AFAS-2) 		
a. Steam Generator #2 Level—Lowb. SG Pressure Difference—High	1.2.3	≥ 25.3% ≤ 192 psid

- (a) The setpoint may be decreased to a minimum value of 100 psia, as pressurizer pressure is reduced, provided the margin between pressurizer pressure and the setpoint is maintained ≤ 400 psia or ≥ 140 psia greater than the saturation pressure of the RCS cold leg when the RCS cold leg temperature is ≥ 485°F. Trips may be bypassed when pressurizer pressure is < 400 psia. Bypass shall be automatically removed when pressurizer pressure is ≥ 500 psia. The setpoint shall be automatically increased to the normal setpoint as pressurizer pressure is increased.
- (b) The setpoint may be decreased as steam pressure is reduced, provided the margin between steam pressure and the setpoint is maintained ≤ 200 psig. The setpoint shall be automatically increased to the normal setpoint as steam pressure is increased.
- (c) The Main Steam Isolation Signal (MSIS) Function (Steam Generator Pressure Low, Steam Generator Level-High and Containment Pressure - High signals) is not required to be OPERABLE when all associated valves isolated by the MSIS Function are closed.
- (d) 1. If the as-found channel setpoint is conservative with respect to the Allowable Value but outside its predetermined as-found acceptance criteria band, then the channel shall be evaluated to verify that it is functioning as required before returning the channel to service. If the as-found instrument channel setpoint is not conservative with respect to the Allowable Value, the channel shall be declared inoperable.
 - 2. The instrument channel setpoint shall be reset to a value that is within the as-left tolerance of the UFSAR Trip Setpoint, or within the as left tolerance of a setpoint that is more conservative than the UFSAR Trip Set Point: otherwise the channel shall be declared inoperable. The UFSAR Trip Setpoint and the methodology used to determine 1) the UFSAR Trip Setpoint. 2) the predetermined as found acceptance criteria band, and 3) the as-left setpoint tolerance band are specified in the UFSAR.

3.3 INSTRUMENTATION

3.3.9 Control Room Essential Filtration Actuation Signal (CREFAS)

LCO 3.3.9 One CREFAS channel shall be OPERABLE.

APPLICABILITY:

MODES 1, 2, 3, 4, 5, and 6, During movement of irradiated fuel assemblies.

ACTIONS

CONDITION		REQUIRED ACTION		COMPLETION TIME
Α.	CREFAS Manual Trip, Actuation Logic, or radiation monitor inoperable in MODE 1, 2, 3, or 4.	A.1	Place one CREFS train in essential filtration mode.	1 hour
associa	Required Action and associated Completion Time of Condition A	B.1 AND	Be in MODE 3.	6 hours
	not met.	B.2	Be in MODE 5.	36 hours

ACTIONS	(continued)
ACITONS	(CONTENIACO)

	CONDITION	REQUIRED ACTION		COMPLETION TIME
Actua radia inope or 6, movem	CREFAS Manual Trip, Actuation Logic, or radiation monitor inoperable in MODE 5 or 6, or during	C.1 <u>OR</u>	Place one CREFS training essential filtration mode	Immediately
	movement of irradiated fuel assemblies.	C.2.1	Suspend movement of irradiated fuel assemblies.	Immediately
		C.2.2 Suspend positive reactivity additions.	Immediately	
			Immediately	
		C.2.3	Suspend CORE ALTERATIONS.	

SURVEILLANCE REQUIREMENTS

	FREQUENCY	
SR 3.3.9.1	Perform a CHANNEL CHECK on the required control room radiation monitor channel.	12 hours

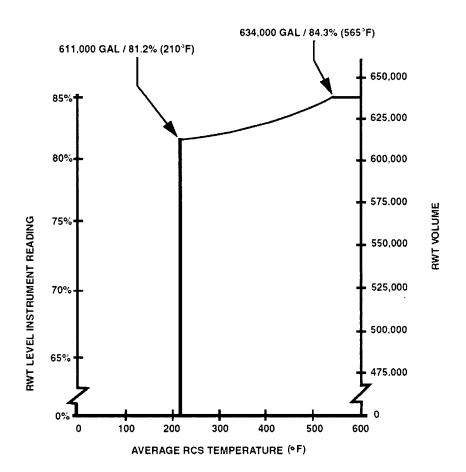


FIGURE 3.5.5-1 Minimum Required RWT Volume

ACTIONS (continued)

	CONDITION	F	REQUIRED ACTION	COMPLETION TIME
C.	Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, 3, or 4.	C.1 AND	Be in MODE 3.	6 hours
		C.2	Be in MODE 5.	36 hours
D.	Required Action and associated Completion Time of Condition A not met in MODE 5 or 6.	D.1	Place OPERABLE CREFS train in essential filtration mode.	Immediately
Ε.	Required Action and associated Completion Time of Condition A not met during movement of irradiated fuel	E.1	Place OPERABLE CREFS Train in essential filtration mode.	Immediately
	assemblies.	<u>OR</u> E.2	Suspend movement of irradiated fuel assemblies.	Immediately
F.	Two CREFS trains inoperable in MODE 5 or 6, or during movement of irradiated fuel assemblies.	F.1 <u>AND</u>	Suspend CORE ALTERATIONS.	Immediately
<u>OR</u>	One or more CREFS trains inoperable due to inoperable CRE boundary in MODE 5 or 6, or during movement of irradiated fuel assemblies.	F.2	Suspend movement of irradiated fuel assemblies.	Immediately
G.	Two CREFS trains inoperable in MODE 1, 2, 3, or 4, for reasons other than Condition B.	G.1	Enter LCO 3.0.3.	Immediately

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.
 - f. Modification of core protection calculator (CPC) addressable constants. These procedures shall include provisions to ensure that sufficient margin is maintained in CPC type I addressable constants to avoid excessive operator interaction with CPCs during reactor operation.

Modifications to the CPC software (including changes of algorithms and fuel cycle specific data) shall be performed in accordance with the most recent version of the "Software Program Manual for Common Q Systems," CE-CES-195, which has been determined to be applicable to the facility. Additions or deletions to CPC addressable constants or changes to addressable constant software limit values shall not be implemented without prior NRC approval.

5.5 Programs and Manuals (continued)

5.5.16 Containment Leakage Rate Testing Program (continued)

- 3. The first Type A test performed after the Unit 1 November 1999 Type A test shall be prior to November 4, 2014.
- 4. The first Type A test performed after the Unit 2 November 2000 Type A test shall be prior to November 2, 2015.
- 5. The first Type A test performed after the Unit 3 April 2000 Type A test shall be prior to April 27, 2015.
- b. The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a , is 58.0 psig. The containment design pressure is 60 psig.
- c. The maximum allowable containment leakage rate, L_a . at P_a , shall be 0.1 % 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 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 La when pressurized to \geq 14.5 psig.
- e. The provisions of SR 3.0.2 do not apply to the test frequencies in the Containment Leakage Rate Testing Program.
- f. The provisions of SR 3.0.3 are applicable to the Containment Leakage Rate Testing Program.