

## ENCLOSURE 1

EXISTING TECHNICAL SPECIFICATION REQUIREMENTS  
APPLICABLE TO DEFUELED CONDITION

<u>TECH. SPEC. NO.</u>	<u>TECHNICAL SPECIFICATION TITLE</u>	<u>COMMENTS</u>
1.0	Definitions	
3.0	Limiting Conditions for Operation (General)	All the provisions of Technical Specification 3.0 will be applicable when defueled except for Section 3.0.3. That section is not applicable in Modes 5 or 6.
3.5.10	Radiation Monitoring Instrumentation	Radiation monitoring instrumentation for the control room and spent fuel pool areas per Table 3.5.10-1, Items 1a and 1b, will be maintained operable when defueled. <sup>1</sup>
3.7.2	Electrical Supply: Shutdown	<p>Comply with all Mode 6 limiting conditions for operation except the diesel generator automatic start requirement of 3.7.2.b. That requirement is unnecessary since sufficient time will be available to manually start the diesel generator to ensure continuation of spent fuel pool cooling if offsite power is lost when defueled.</p> <p>Technical Specification 3.7.2.d will continue to apply when defueled except that vital buses 1, 2, and 4 will be energized from one of their backup power sources (motor control centers 1 or 2) rather than from their associated inverters.</p> <p>All of the provisions of the existing action statement for Technical Specification 3.7.2 will be applicable when defueled except for the last sentence of the action statement concerning venting and depressurizing of the reactor coolant system (RCS) within eight hours. That provision will not be applicable during the defueled</p>

<sup>1</sup> The programmatic controls for radioactive effluents and radiological environmental monitoring that are included in the Offsite Dose Calculation Manual in accordance with Technical Specification 6.8.4 will continue to apply during the defueled condition.

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3.7.2	Electrical Supply: Shutdown (continued)	condition since the RCS will be drained and vented when defueled. Additionally, we will initiate corrective action within one hour to restore the required AC electrical sources if they become inoperable when defueled.
3.8.B	Fuel Loading and Refueling	All the provisions of Technical Specification 3.8.B will be applicable when defueled except for the spent fuel pool boration requirement of Section 3.8.B.2. Our analyses demonstrate that spent fuel pool boration is not needed to maintain the required shutdown margin for any of the fuel to be stored in the pool, including the four mixed oxide fuel assemblies currently stored in the pool.
3.12	Control Room Emergency Air Treatment System	The control room emergency air treatment system will be maintained operable during the defueled condition even though Technical Specification 3.12 requires that system to be operable only when the reactor is critical. If the system becomes inoperable, we will return the system to operable status within seven days.
3.13	Shock Suppressors (Snubbers)	Maintain snubbers operable on systems required to be operable when defueled.
3.14.1	Fire Suppression Water System	
3.14.2	Spray and/or Sprinkler Systems	Maintain sprinkler systems operable which are needed to support systems/ components that are required to be operable when defueled.
3.14.4	Halon Systems	
3.14.5	Fire Hose Stations	Maintain fire hose stations operable which are needed to support systems/ components that are required to be operable when defueled.

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<u>TECH. SPEC. NO.</u>	<u>TECHNICAL SPECIFICATION TITLE</u>	<u>COMMENTS</u>
3.14.6	Fire Detection Instrumentation	Maintain fire detection instrumentation operable which is needed to support systems/components that are required to be operable when defueled.
3.14.7	Fire Barriers	Maintain fire barriers operable which are needed to support systems/components that are required to be operable when defueled.
4.0	Surveillance Requirements (General)	
4.1.1	Operational Safety Items	The only surveillance that will continue to be performed when defueled is surveillance of the spent fuel pool water level per Table 4.1.2, Item 14a. None of the other surveillances specified in Technical Specification 4.1.1 will be performed since they apply to systems or components that will be inoperable when defueled.
4.1.11	Radiation Monitoring Instrumentation	Surveil instrumentation for the spent fuel pool and control room areas per Table 4.1.11-1, Items 1a and 1b. <sup>2</sup>
4.4.A	Emergency Power System Periodic Testing, Offsite Circuits	
4.4.B	Emergency Power System Periodic Testing, Diesel Generators	
4.4.C	Emergency Power System Periodic Testing, AC Distribution	
4.4.D	Emergency Power System Periodic Testing, DC Power Sources	

<sup>2</sup> The programmatic controls for radioactive effluents and radiological environmental monitoring that are included in the Offsite Dose Calculation Manual in accordance with Technical Specification 6.8.4 will continue to apply during the defueled condition.

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<u>TECH. SPEC. NO.</u>	<u>TECHNICAL SPECIFICATION TITLE</u>	<u>COMMENTS</u>
4.4.G	Emergency Power System Periodic Testing, Manual Transfer Switches	
4.4.H	Emergency Power System Periodic Testing, Diesel Generator Maintenance, Overhaul and Inspection	All emergency diesel generator (EDG) maintenance and surveillances that are required to be completed on a daily, monthly, or as required basis will be performed as usual on both EDGs when defueled. We are evaluating the major EDG maintenance and surveillances that are normally performed at the end of a fuel cycle during a refueling outage. Our plans regarding such end-of-cycle maintenance and surveillance will be included in our proposed PDTs.
4.7	Inservice Inspection Requirements	Our plans for performing inservice inspections for the final plant shutdown are addressed in a letter to the NRC dated August 7, 1992.
4.11	Control Room Emergency Air Treatment System	
4.12	Miscellaneous Radioactive Materials Sources	
4.14	Shock Suppressors (Snubbers) Surveillance	Surveil snubbers for systems that are required to be operable when defueled. Snubber functional testing required by Section 4.14.C will be performed prior to defueling and at least once every 18 months thereafter.
4.15.1	Fire Suppression Water System	All of the provisions of this Technical Specification will be applicable when defueled with the following clarifications. The verification of correct valve positions required by Section 4.15.1.C will be performed at least once every 31 days for all valves in the fire suppression water system flow path that are required to be operable when defueled. The valve cycling testing required by

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4.15.1	Fire Suppression Water System (continued)	Sections 4.15.1.D and 4.15.1.E.3 shall be performed at least once every 18 months for each valve in the fire suppression water system flow path that is required to be operable when defueled.
4.15.2	Spray and/or Sprinkler Systems	Surveil sprinkler systems that support systems/components which are required to be operable when defueled. The valve cycling testing required by Section 4.15.2.c and 4.15.2.d.1.b will be performed at least once every 12 months.
4.15.4	Halon System	
4.15.5	Fire Hose Stations	Surveil fire hose locations that support systems/components which are required to be operable when defueled.
4.15.6	Fire Detection Instrumentation	Fire detection instrumentation that supports systems/components which are required to be operable when defueled will be surveilled at least once every six months.
4.15.7	Fire Barriers	Surveil fire barriers that support systems/components which are required to be operable when defueled.
5.1	Site Description	
5.4	Auxiliary Equipment	
6.1	Responsibility	
6.2.1	Offsite and Onsite Organizations	
6.2.2	Unit Staff	
6.3.1	Unit Staff Qualifications	
6.4	Training	
6.5.1	Onsite Review Committee (OSRC)	
6.5.2	Technical Review and Control	

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6.5.3	Nuclear Safety Group (NSG)	
6.6.1	Reportable Event Reporting	
6.8	Procedures and Programs	Maintain procedures and programs for systems that will be operable during the defueled condition.
6.9	Reporting Requirements	
6.10	Record Retention	
6.11	Radiation Protection Program	
6.12	High Radiation Area	
6.13	Process Control Program	
6.14	Offsite Dose Calculation Manual (ODCM)	
6.16	Environmental Protection, Facility Design and Operation	

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<u>TECH. SPEC. NO.</u>	<u>TECHNICAL SPECIFICATION TITLE</u>	<u>BASIS FOR EXCLUSION</u>
2.1	Safety Standards, Reactor Core - Limiting Combination of Power, Pressure, and Temperature	Safety standards for reactor power, system pressure, and reactor coolant system (RCS) temperature are unnecessary since the reactor will not be operated and the RCS will be drained during the defueled condition.
3.0.3	Limiting Conditions for Operation (General)	The operational requirements to be followed when a limiting condition for operation is not satisfied are not applicable in Modes 5 or 6.
3.1.1	Reactor Coolant System, Maximum Reactor Coolant Activity	The RCS will be drained during the defueled condition. Reactor coolant sample surveillances are only required for Modes 1, 2, 3, and 4 per Technical Specification 4.1.1.B, Table 4.1.2.
3.1.2.A	Reactor Coolant System, Operational Components	RCS overpressure protection is unnecessary when defueled since the RCS will be drained. One pressurizer safety valve will be removed as a precautionary measure.
3.1.2.B through H	Reactor Coolant System, Operational Components	These requirements are only applicable in Modes 1, 2, 3, 4, or 5.
3.1.2.I	Reactor Coolant System, Operational Components	Electrical power will be removed from the reactor coolant pumps during the defueled condition.
3.1.3	Combined Heatup, Cooldown, and Pressure Limitations	The RCS will be inoperable with no primary heatup/cooldown during the defueled condition.
3.1.4	Leakage and Leakage Detection Systems	These requirements are only applicable in Modes 1 through 5.
3.1.5	Pressurizer Relief Valves	These requirements are only applicable in Modes 1, 2, and 3.
3.1.6	Pressurizer	These requirements are only applicable in Modes 1, 2, and 3.
3.1.7	Reactor Coolant System Vents	These requirements are only applicable in Modes 1, 2, 3, and 4.

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<u>TECH. SPEC. NO.</u>	<u>TECHNICAL SPECIFICATION TITLE</u>	<u>BASIS FOR EXCLUSION</u>
3.2	Chemical and Volume Control Systems	These requirements are only applicable when fuel is in the vessel or when the reactor is critical.
3.3.1	Operating Status	The safety injection, recirculation, and containment spray systems will be inoperable during the defueled condition.
3.3.2	Shutdown Status	Positive barriers between the RCS and the feedwater condensate and safety injection systems are unnecessary when defueled. The barriers are not needed since RCS overpressurization or boron dilution are not of concern since all fuel will be removed from the reactor and the RCS will be drained and vented.
3.3.3	Minimum Boron Concentration in the Refueling Water Storage Tank and Safety Injection Lines and Minimum RWST Water Volume	These requirements are only applicable in Modes 1, 2, 3, and 4.
3.3.4	Minimum Solution Volume Hydrazine Concentration in the Hydrazine Tank	The containment spray system will be inoperable during the defueled condition.
3.3.5	Primary Coolant System Pressure Isolation Valves	The RCS will be drained during the defueled condition.
3.4.1	Turbine Cycle, Operating Status	These requirements are only applicable in Modes 1, 2, and 3.
3.4.2	Maximum Secondary Coolant Activity	The RCS and the secondary coolant system will be drained during the defueled condition.
3.4.3	Auxiliary Feedwater System	These requirements are only applicable in Modes 1, 2, and 3.
3.4.4	Auxiliary Feedwater Storage Tank	These requirements are only applicable in Modes 1, 2, and 3.



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<u>TECH. SPEC. NO.</u>	<u>TECHNICAL SPECIFICATION TITLE</u>	<u>BASIS FOR EXCLUSION</u>
3.5.1	Reactor Trip System Instrumentation	These requirements are only applicable in Modes 1, 2, 3, 4, or 5.
3.5.2	Control Rod Insertion Limits	These requirements are only applicable in Modes 1 and 2.
3.5.3	Control and Shutdown Rod Misalignment.	These requirements are only applicable during reactor startup and power operations.
3.5.4	Rod Position Indicating System	These requirements are only applicable during reactor startup and power operations.
3.5.5	Containment Isolation Instrumentation	These requirements are only applicable in Modes 1, 2, 3, or 4.
3.5.6	Accident Monitoring Instrumentation	These requirements are only applicable in Modes 1, 2, and 3.
3.5.7	Auxiliary Feedwater Instrumentation	These requirements are only applicable in Modes 1, 2, and 3.
3.5.8	Deleted	
3.5.9	Deleted	
3.6.1	Containment Sphere	Maintaining containment integrity is unnecessary once all fuel has been stored in the spent fuel pool.
3.6.2	Containment Isolation Valves	These requirements are only applicable in Modes 1, 2, 3, and 4.
3.6.3	Hydrogen Monitors and Hydrogen Recombiners	These requirements are only applicable in Modes 1 and 2.
3.7.1	Electrical Supply: Operating	These requirements are only applicable in Modes 1, 2, 3, and 4.
3.7.2.b	Electrical Supply: Shutdown (Emergency Diesel Generator)	All the requirements of Section 3.7.2.b will be followed except the provision for emergency diesel generator (EDG) automatic start. EDG automatic start is not needed when defueled since adequate time is available to recover from a loss of offsite power by manually starting an EDG to ensure continued cooling of the spent fuel pool.

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3.7.2.d	Electrical Supply: Shutdown (Vital Buses)	Technical Specification 3.7.2.d will continue to apply when defueled except that vital buses 1, 2, and 4 will be energized from one of their backup power sources (motor control centers 1 or 2) rather than from their associated inverters.
3.8.A	Fuel Loading and Refueling	Removing decay heat from the reactor and monitoring core subcritical neutron flux and containment radiation levels are unnecessary after all fuel has been permanently removed from the reactor. The requirement for monitoring the radiation level in the spent fuel building will be satisfied by complying with Technical Specification 3.5.10, Table 3.5.10-1, Item 1b.
3.8.B.2	Fuel Loading and Refueling	All of the provisions of Section 3.8.B.2 will be followed when defueled except for the requirement for boration of the spent fuel pool water. Our analyses demonstrate that spent fuel pool boration is not needed to maintain the required shutdown margin for any of the fuel to be stored in the pool, including the four mixed oxide fuel assemblies currently stored in the pool.
3.9	Moderator Temperature Coefficient	The RCS will be drained and vented during the defueled condition.
3.10	Incore Instrumentation	These requirements are only applicable in Mode 1.
3.11	Continuous Power Distribution Monitoring	These requirements are only applicable in Mode 1.
3.14.3	Foam Suppression	The lube oil reservoir and conditioner will be drained during the defueled condition.
3.14.8	Dedicated and Alternate Shutdown Systems	These requirements are only applicable in Modes 1, 2, 3, and 4.

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<u>TECH. SPEC. NO.</u>	<u>TECHNICAL SPECIFICATION TITLE</u>	<u>BASIS FOR EXCLUSION</u>
3.14.9	Eight Hour Emergency Lighting Units	These requirements are only applicable in Modes 1, 2, 3, and 4.
3.15	Deleted	
3.16.1	Deleted	
3.16.2	Deleted	
3.16.3	Deleted	
3.16.4	Deleted	
3.16.5	Gas Storage Tanks	The gas storage tanks will be out of service and vented at all times during the defueled condition.
3.16.6	Explosive Gas Mixtures	The waste gas holdup system will be out of service and vented at all times during the defueled condition.
3.17	Deleted	
3.18	Deleted	
3.19	Deleted	
3.20	Overpressure Protection Systems	RCS overpressurization is not a concern when defueled since that system will be drained. A pressurizer safety valve will be removed as a precautionary measure.
4.1.1	Operational Safety Items	The only surveillance that will continue to be performed when defueled is surveillance of the spent fuel pool water level per Table 4.1.2, Item 14a. None of the other surveillances specified in Technical Specification 4.1.1 will be performed since they apply to systems or components that will be inoperable when defueled.
4.1.2	Deleted	
4.1.3	Deleted	

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4.1.4	Containment Isolation Instrumentation	Surveillance of containment isolation instrumentation is unnecessary when defueled since that instrumentation is only required to be operable during Modes 1, 2, 3, and 4.
4.1.5	Accident Monitoring Instrumentation	Surveillance of accident monitoring instrumentation is unnecessary when defueled since that instrumentation is only required to be operable in Modes 1, 2, and 3.
4.1.6	Pressurizer Relief Valves	Surveillance of power operated relief valves is unnecessary when defueled since those valves are only required to be operable in Modes 1, 2, and 3.
4.1.7	Pressurizer	Surveillance of the pressurizer is unnecessary when defueled since the pressurizer is only required to be operable in Modes 1, 2, and 3.
4.1.8	Auxiliary Feedwater Instrumentation	Surveillance of the auxiliary feedwater instrumentation is unnecessary when defueled since that instrumentation is only required to be operable in Modes 1, 2, and 3.
4.1.9	Auxiliary Feedwater System Surveillance	Surveillance of the auxiliary feedwater system is unnecessary when defueled since that system is only required to be operable in Modes 1, 2, and 3.
4.1.10	Auxiliary Feedwater Storage Tank Surveillance	Surveillance of the auxiliary feedwater storage tank is unnecessary when defueled since that tank is only required to be operable in Modes 1, 2, and 3.

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4.1.11	Radiation Monitoring Instrumentation	Only the instrumentation for the spent fuel pool and control rooms (Table 4.1.11-1, Items 1a and 1b) will continue to be surveilled when defueled. The other instruments listed in Table 4.1.11 need not be operable when defueled since they are not required to be operable during Mode 6 and, therefore, will not be surveilled.
4.1.12	Reactor Coolant System Vents	The RCS will be drained and vented by removing a pressurizer safety valve during the defueled condition.
4.1.13	Leakage and Leakage Detection Systems	Surveillance of RCS leakage and associated leak detection system is unnecessary since the RCS will be drained and vented when defueled.
4.2	Safety Injection and Containment Spray System Periodic Testing	
4.2.1.I.A	Hot Safety Injection System Test	The hot safety injection system test is unnecessary when the plant is permanently defueled since the safety injection system is only required to be operable during Modes 1, 2, and 3.
4.2.1.I.B	Trisodium Phosphate Test	The trisodium phosphate test does not need to be performed when defueled since control of the containment sump water pH to minimize ECCS stress corrosion cracking after a LOCA is not a concern when the RCS is drained.
4.2.1.I.C	Containment Spray System Test	Surveillance of the containment spray system is unnecessary when defueled since that system will be inoperable.

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4.2.1.II.A	Pump Tests	Testing the safety injection, recirculation, spray additive, and refueling water pumps is unnecessary since these pumps are part of the ECCS and containment spray systems. These systems will be inoperable when defueled.
4.2.1.II.B	Leakage Testing	Leakage testing of the recirculation loop outside containment and the containment spray system is unnecessary when defueled since both systems will be drained.
4.2.1.II.C	RWST Low Level Trips	Surveillances required by this specification are unnecessary when defueled since the safety injection and feedwater systems will be drained.
4.2.2	Primary Coolant System Pressure Isolation Valves Testing	Surveillance testing of the primary coolant isolation valves is unnecessary when defueled since the RCS will be inoperable and drained.
4.3.1.I	Containment Testing, Integrated Leak Rate Test, Type A	Containment integrity is not required when defueled.
4.3.1.II	Containment Penetration Leakage Rate Tests (Type B)	Containment integrity is not required when defueled.
4.3.1.III	Containment Isolation Valve Leakage Rate Tests (Type C)	Containment integrity is not required when defueled.
4.3.1.IV	Recirculation System	Containment integrity is not required when defueled.
4.3.1.V	Test Result Report	A test result report is unnecessary since containment testing will not be performed when defueled.
4.3.1.VI	Containment Modification	Containment integrity is not required when defueled.

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4.3.2	Containment Isolation Valves	Surveillance of the containment isolation valves is unnecessary when defueled since these valves are only required to be operable in Modes 1, 2, 3, and 4.
4.3.3	Hydrogen Monitors and Hydrogen Recombiners	Surveillance of the hydrogen monitors and recombiners is not necessary when defueled since that equipment is only required to be operable in Modes 1 and 2.
4.4.E and F	Emergency Power System Periodic Testing (SISLOP Testing)	Simulated SISLOP <sup>3</sup> testing of the Safeguards Load Sequencing Systems and the EDG is unnecessary when defueled. Sufficient time is available to manually start an EDG to ensure continued SFP cooling after a loss of offsite power.
4.5	Deleted	
4.6.1	Deleted	
4.6.2	Deleted	
4.6.3	Deleted	
4.6.4	Deleted	
4.6.5	Gas Storage Tank	The gas storage tanks will be out of service and vented at all times during the defueled condition.
4.6.6	Explosive Gas Mixture	The waste gas holdup system will be out of service and vented at all times during the defueled condition.
4.8	Reactivity Anomalies	Power operations will not be allowed once the plant is defueled.
4.9	Reactor Vessel Surveillance Program	Reactor vessel irradiation surveillances will be discontinued once the reactor has been permanently defueled.

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<sup>3</sup> SISLOP is the signal generated by a sequencer on coincident loss of voltage on its associated 4160 volt bus and demand for safety injection.

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4.10	Augmented Inservice Inspection of High Energy Lines Outside Containment	High energy lines outside containment will be inoperable when defueled.
4.13	Deleted	
4.15.3	Foam Suppression Systems	The lube oil reservoir and conditioner will be drained when defueled.
4.15.8	Dedicated and Alternate Shutdown Systems Surveillance	The dedicated and alternate shutdown systems are only required to be operable in Modes 1, 2, 3, and 4.
4.15.9	Eight Hour Emergency Lighting Units Surveillance	The eight hour emergency lighting units are only required to be operable in Modes 1, 2, 3, and 4.
4.16	Inservice Inspection of Steam Generator Tubing	The steam generator will be inoperable when defueled.
4.17	Deleted	
4.18	Deleted	
4.19	Deleted	
4.20	Overpressure Protection Systems	RCS overpressurization protection systems need not be operable when defueled since the RCS will be drained and vented (via the removal of one of the pressurizer safety valves). This eliminates the need to surveil the overpressurization protection systems.
5.2	Design Features, Containment	Design features of the containment are no longer of interest when defueled.
5.3	Design Features, Reactor	Design features of the reactor are no longer of interest when defueled.
6.7.1	Safety Limit Violation	Safety limits on reactor power, system pressure, and RCS temperature will not be applicable once the reactor is permanently defueled.
6.15	Deleted	