



FirstEnergy Nuclear Operating Company

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February 9, 2016
L-16-030

10 CFR 50.90

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

Subject:
Davis-Besse Nuclear Power Station, Unit No. 1
Docket No. 50-346, License No. NPF-3
Request for an Amendment to Revise Technical Specification 5.5.3, "Radioactive Effluents Controls Program"

In accordance with the provisions of 10 CFR 50.90, FirstEnergy Nuclear Operating Company (FENOC) is submitting a request for an amendment to the technical specifications (TS) for Davis-Besse Nuclear Power Station, Unit No. 1.

The proposed amendment will revise the TS 5.5.3.b and TS 5.5.3.g requirements for limitations on the radioactive material released in liquid and gaseous effluents and the references for the radioactive material effluent requirements. The proposed amendment wording is based on the NUREG-1430, "Standard Technical Specifications Babcock and Wilcox Plants Revision 4," and TSTF-258-A, "Changes to Section 5.0, Administrative Controls," Revision 4.

The enclosure contains an evaluation of the proposed amendment. FENOC requests approval of the proposed license amendment by March 1, 2017 with the amendment being implemented within 90 days of approval.

Davis-Besse Nuclear Power Station, Unit No. 1
L-16-030
Page 2 of 2

There are no regulatory commitments contained in this submittal. If there are any questions or if additional information is required, please contact Mr. Thomas A. Lentz, Manager – Fleet Licensing, at (330) 315-6810.

I declare under penalty of perjury that the foregoing is true and correct. Executed on February 9, 2016.

Sincerely,



Brian D. Boles

Enclosure:
Evaluation of Proposed License Amendment

cc: NRC Region III Administrator
NRC Resident Inspector
NRC Project Manager
Executive Director, Ohio Emergency Management Agency, State of Ohio
(NRC Liaison)
Utility Radiological Safety Board

Subject: Request to Amend Technical Specification 5.5.3, "Radioactive Effluent Controls Program"

1.0 SUMMARY DESCRIPTION

2.0 DETAILED DESCRIPTION

3.0 TECHNICAL EVALUATION

4.0 REGULATORY EVALUATION

4.1 Significant Hazards Consideration

4.2 Applicable Regulatory Requirements/Criteria

4.3 Precedent

4.4 Conclusions

5.0 ENVIRONMENTAL CONSIDERATION

6.0 REFERENCES

ATTACHMENTS:

1. Proposed Technical Specification Change (Mark-up)
2. Proposed Technical Specification Change (Retyped) – For Information Only

1.0 SUMMARY DESCRIPTION

This evaluation supports a request to amend Operating License No. NPF-3 for Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS).

The proposed amendment would modify the Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS) Technical Specification (TS) 5.5.3, "Radioactive Effluent Controls Program," by incorporating two changes. The two changes will modify TS 5.5.3.b and TS 5.5.3.g to revise the requirements for limitations on the concentrations of radioactive material released in liquid and gaseous effluents, and to revise the references for the radioactive material effluent requirements. The proposed changes will maintain the same overall level of effluent control while retaining the operational flexibility that existed with the TS under the pre-1994 version of 10 CFR 20. The proposed amendment is consistent with NUREG-1430, "Standard Technical Specifications Babcock and Wilcox Plants Revision 4" and two of the changes described in the Nuclear Regulatory Commission (NRC) approved Technical Specification Task Force (TSTF) Improved Standard Technical Specifications Traveler, TSTF-258-A, "Changes to Section 5.0, Administrative Controls," Revision 4.

2.0 DETAILED DESCRIPTION

The two proposed changes to TS 5.5.3 will revise the requirements and references for limitations on radioactive material released in liquid and gaseous effluents, as described below.

1. TS 5.5.3.b, which specifies the limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, will be revised to state the following:

"Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001 – 20.2402."

2. TS 5.5.3.g, which specifies the limitations on the dose rates resulting from radioactive material released in gaseous effluents to areas beyond the site boundary, will be revised to state the following:

"Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the site boundary shall be in accordance with the following:

1. For noble gases: a dose rate ≤ 500 mrem/yr to the whole body and a dose rate ≤ 3000 mrem/yr to the skin, and

2. For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives >8 days: ≤ 1500 mrem/yr to any organ."

The proposed amendment is consistent with NUREG-1430 and two of the changes described in TSTF-258-A, Revision 4.

Attachment 1 provides the TS pages marked to show the proposed changes.

Attachment 2 provides the typed TS pages with the proposed changes incorporated.

3.0 TECHNICAL EVALUATION

10 CFR Part 20 was revised in its entirety, effective January 1, 1994. The NRC had determined that it was acceptable for the licensees to retain their existing level of effluent control by implementing the "as low as is reasonably achievable" (ALARA) requirement after January 1, 1994, without submitting individual requests for amending their TS to comply with the new 10 CFR 20.1101(b).

The requirements for the content of the technical specifications concerning radioactive effluents are contained in 10 CFR 50.36a, "Technical specifications on effluents from nuclear power plants," which requires licensees to maintain control over radioactive material in effluents to unrestricted areas, produced during normal reactor operations, including expected occurrences, to levels that are ALARA. For power reactors, 10 CFR 50, Appendix I, "Numerical Guides for Design Objectives and Limiting Conditions for Operation to Meet the Criterion 'As Low as is Reasonably Achievable' for Radioactive Material in Light-Water-Cooled Nuclear Power Reactor Effluents," contains the guidance to meet the ALARA requirement.

In the pre-1994 version of 10 CFR 20, 10 CFR 20.106 referenced 10 CFR 20, Appendix B, "Concentrations in Air and Water Above Natural Background," Table II. Table II provided radionuclide concentrations based on maximum permissible concentrations, which related to an annual dose of 500 millirem (mrem). The radioactive liquid effluent concentration limits given in the revised version of 10 CFR 20, 10 CFR 20, Appendix B, "Annual Limits on Intake (ALIs) and Derived Air Concentrations (DACs) of Radionuclides for Occupational Exposure; Effluent Concentrations; Concentrations for Release to Sewerage," Table 2, are based on an annual dose of 50 mrem total effective dose equivalent.

The use of liquid effluent concentration values that are ten times those listed in Appendix B, Table 2 will not have a negative effect on the ability to continue to operate within the design objectives in Appendix I to 10 CFR 50. Thus, the proposed change to TS 5.5.3.b maintains the same overall level of effluent control while retaining the operational flexibility that existed with the TS under the pre-1994 10 CFR 20 requirements. Increasing the TS limits by a factor of ten has been approved by the NRC as acceptable limits for liquid effluent control.

As stated in the introduction to revised 10 CFR Part 20, Appendix B, the gaseous effluent concentration limits given in Table 2, Column 1, are based on an annual dose of 50 mrem for isotopes for which inhalation or ingestion is limiting. Use of release concentrations corresponding to limiting dose rates at the site boundary from noble gases less than or equal to 500 mrem/year (mrem/yr) to the total body and 3000 mrem/yr to the skin; and 1500 mrem/yr to any organ from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than eight days has been determined to be acceptable as TS limits for gaseous effluents, as evidenced by NRC approval of similar TS changes for other utilities. The proposed change maintains the same overall level of effluent control and dose rate limits as referenced in the current wording of TS 5.5.3.g. Recognizing that this limit is a constraint on the release rate for gaseous effluents and not an annual dose limit, reference to the 10 CFR Part 20, Appendix B, Table 2, Column 1 values is not necessary.

The revisions to the TS to increase the current 10 CFR 20, Appendix B, Table 2 values by a factor of ten, to revise the requirement references, and to change the gaseous effluent limits were proposed by the NRC in a letter dated April 9, 1997 between C. Grimes (NRC) to J. Davis (Nuclear Energy Institute). The proposed changes would maintain the same overall level of liquid and gaseous effluent control while retaining the operational flexibility that existed with TS under the pre-1994 10 CFR 20. These changes would continue to require that radiation doses to members of the public from gaseous and liquid effluent releases from nuclear power plants be within the values given in 10 CFR 50, Appendix I and 10 CFR 20.

TSTF-258 was developed to incorporate these and other changes into the administrative section of the Babcock and Wilcox standard technical specifications (STS). The intent of TSTF-258 was to clarify the Improved Standard Technical Specifications to be consistent with the intent of the revised 10 CFR Part 20, and eliminate possible confusion or improper implementation of the revised 10 CFR 20 requirements. TSTF-258 was approved by the NRC in 1999, thus becoming TSTF-258-A. This change was subsequently incorporated into Revision 2 of NUREG-1430.

The proposed amendment is consistent with NUREG-1430 and two of the changes described in TSTF-258-A, Revision 4. The changes proposed for TS 5.5.3.b and TS 5.5.3.g provide reasonable assurance that the levels of radioactive materials in unrestricted areas will not exceed exposures within the design objectives of 10 CFR 50, Appendix I, Section II.A, and the limits contained in 10 CFR 20.1301(a).

4.0 REGULATORY EVALUATION

FirstEnergy Nuclear Operating Company (FENOC) proposes to amend the Davis-Besse Nuclear Power Station, Unit No. 1 (DBNPS) technical specifications (TS). The proposed amendment would modify TS 5.5.3, "Radioactive Effluent Controls Program," by modifying TS 5.5.3.b and TS 5.5.3.g to revise the requirements and references for limitations on radioactive material released in liquid and gaseous effluents. The proposed changes will maintain the same overall level of effluent control while retaining the operational flexibility that existed with the TS under the pre-1994 version of 10 CFR 20. The proposed amendment is consistent with NUREG-1430, "Standard Technical Specifications Babcock and Wilcox Plants Revision 4," and two of the changes described in the Technical Specification Task Force (TSTF) Improved Standard Technical Specifications Traveler, TSTF-258-A, Revision 4.

4.1 Significant Hazards Consideration

FENOC has evaluated whether or not a significant hazards consideration is involved with the proposed license amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as described below.

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

Response: No.

This license amendment request revises TS 5.5.3.b and TS 5.5.3.g consistent with two changes proposed in TSTF-258-A. The amendment has no effect on the design, testing, or operation of plant structures, systems, or components. The proposed amendment does not affect any accident initiators and does not impact any safety analysis. The proposed amendment does not impose any new radiological hazards to the plant staff or the public.

Therefore, the proposed amendment does not involve an increase in the probability or consequences of an accident previously evaluated.

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

Response: No.

This license amendment request revises TS 5.5.3.b and TS 5.5.3.g consistent with two changes proposed in TSTF-258-A. The amendment will not change any equipment, does not require new equipment to be installed, and will not change the way current equipment operates or is maintained. No credible failure mechanisms, malfunctions, or accident initiators are created by the proposed amendment.

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

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

Response: No.

This license amendment request revises TS 5.5.3.b and TS 5.5.3.g consistent with two changes proposed in TSTF-258-A. The amendment has no effect on the design, testing, maintenance, or operation of plant structures, systems, or components. The proposed amendment does not affect any safety analysis. Therefore, the proposed amendment does not involve a significant reduction in a margin of safety.

Based on the above, FENOC 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.

4.2 Applicable Regulatory Requirements/Criteria

The following regulations are applicable to the proposed license amendment.

10 CFR 20.1301, "Dose limits for individual members of the public," provides the dose limits for members of the public. The total effective dose equivalent to individual members of the public from licensed operation does not exceed 100 mrem in a year. Dose in any unrestricted area from external sources does not exceed 2 mrem in any one hour.

10 CFR 20.1302, "Compliance with dose limits for individual members of the public," states that a licensee can show compliance with the annual dose limit in 10 CFR 20.1301 by either demonstrating through measurement or calculation that the dose from licensed operation does not exceed the annual dose limit, or by demonstrating that the annual average concentrations of radioactive material released in gaseous and liquid effluents at the boundary of the unrestricted area do not exceed the values in 10 CFR Part 20, Appendix B, Table 2, and that if an individual were continuously present in an unrestricted area, the dose from external sources would not exceed 2 mrem in an hour and 50 mrem in a year.

10 CFR 50, Appendix I, "Numerical Guides for Design Objectives and Limiting Conditions for Operation to Meet the Criterion 'As Low as is Reasonably Achievable' for Radioactive Material in Light-Water-Cooled Nuclear Power Reactor Effluents," contains guidance on meeting the 10 CFR 50.36a, "Technical specifications on effluents from nuclear power reactors," ALARA requirement. Appendix I states that the annual total quantity of all radioactive material above background to be released to unrestricted areas will not result in an estimated annual dose from liquid effluents for any individual in an unrestricted area in excess of 3 mrem to the total body or 10 mrem to any organ. Appendix I also states that the annual total quantity of all radioactive material above background to be released to the atmosphere will not result in an estimated annual external dose from gaseous effluents to individuals in unrestricted areas in excess of 5 mrem to the total body or 15 mrem to the skin. Additionally, the appendix states that the calculated annual total quantity of all radioactive iodine and radioactive material in particulate form above background released in effluents to the atmosphere will not result in an estimated annual dose or dose commitment from such radioactive iodine and radioactive material in particulate form for any individual in an unrestricted area from all pathways of exposure in excess of 15 millirems to any organ.

10 CFR 50.36a, "Technical specifications on effluents from nuclear power plants," provides requirements for the content of TS concerning radioactive effluents from nuclear power plants. 10 CFR 50.36a requires licensees to maintain control over radioactive effluents released to unrestricted areas, produced during normal reactor operations, including expected occurrences, to levels that are ALARA. 10 CFR 50.36a(b) also allows the licensee the flexibility of allowing releases which temporarily permit higher doses as long as the licensee meets the annual dose limits in 10 CFR 20.1301 and the dose design objectives stated in 10 CFR Part 50, Appendix I.

The proposed revision of the TS 5.5.3.b limits for liquid radioactive effluent release concentrations and the TS 5.5.3.g limits for gaseous radioactive effluent release dose rates are acceptable in accordance with 10 CFR 50.36a because the annual

dose limits in 10 CFR 20.1301 and the dose design objectives in 10 CFR Part 50, Appendix I must still be met. By meeting the dose design objectives in 10 CFR Part 50, Appendix I, these doses are considered ALARA.

As a result, compliance with the aforementioned regulations is maintained by the proposed license amendment.

4.3 Precedent

The NRC has issued a license amendment with similar revisions to the "Radioactive Effluent Controls Program" TS to:

- Limerick Generating Station, Units 1 and 2, License Amendment Request dated June 2, 2006 (Accession No. ML061530434); NRC approval dated June 29, 2007 (Accession No. ML071760167).

4.4 Conclusions

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 amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, 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 effluent 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

1. Technical Specification Task Force Improved Standard Technical Specifications Change Traveler, TSTF-258-A, "Changes to Section 5.0, Administrative Controls," Revision 4.

Attachment 1
Proposed Technical Specification Change (Mark-up)
(Two pages follow)

5.5 Programs and Manuals

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include makeup, letdown, seal injection, seal return, low pressure injection, containment spray, high pressure injection, waste gas, primary sampling, and reactor coolant drain systems. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at least once per 24 months.

The provisions of SR 3.0.2 are applicable.

5.5.3 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001 – 20.2402;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days;

5.5 Programs and Manuals

5.5.3 Radioactive Effluent Controls Program (continued)

- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;
- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the site boundary shall be in accordance with Appendix B, Table 2, Column 1 to 40 CFR 20the following:
 - 1. For noble gases: a dose rate \leq 500 mrem/yr to the whole body and a dose rate \leq 3000 mrem/yr to the skin, and
 - 2. For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives $>$ 8 days: a dose rate \leq 1500 mrem/yr to any organ;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives $>$ 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program Surveillance Frequencies.

5.5.4 Reactor Vessel Internals Vent Valves Program

A program shall be established to implement the testing of the reactor vessel internals vent valves every 24 months as follows:

- a. Verify by visual inspection that the valve body and valve disc exhibit no abnormal degradation;
- b. Verify the valve is not stuck in an open position; and
- c. Verify by manual actuation that the valve is fully open when a force of \leq 400 lbs is applied vertically upward.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Reactor Vessel Internals Vent Valves Program test Frequencies.

Attachment 2
Proposed Technical Specification Change
(Retyped) – For Information Only
(Two pages follow)

5.5 Programs and Manuals

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include makeup, letdown, seal injection, seal return, low pressure injection, containment spray, high pressure injection, waste gas, primary sampling, and reactor coolant drain systems. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at least once per 24 months.

The provisions of SR 3.0.2 are applicable.

5.5.3 Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to members of the public from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- a. Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;
- b. Limitations on the concentrations of radioactive material released in liquid effluents to unrestricted areas, conforming to ten times the concentration values in Appendix B, Table 2, Column 2 to 10 CFR 20.1001 – 20.2402;
- c. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- d. Limitations on the annual and quarterly doses or dose commitment to a member of the public from radioactive materials in liquid effluents released from each unit to unrestricted areas, conforming to 10 CFR 50, Appendix I;
- e. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days. Determination of projected dose contributions from radioactive effluents in accordance with the methodology in the ODCM at least every 31 days;

5.5 Programs and Manuals

5.5.3 Radioactive Effluent Controls Program (continued)

- f. Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a period of 31 days would exceed 2% of the guidelines for the annual dose or dose commitment, conforming to 10 CFR 50, Appendix I;
- g. Limitations on the dose rate resulting from radioactive material released in gaseous effluents from the site to areas at or beyond the site boundary shall be in accordance with the following:
 - 1. For noble gases: a dose rate ≤ 500 mrem/yr to the whole body and a dose rate ≤ 3000 mrem/yr to the skin, and
 - 2. For iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half-lives > 8 days: a dose rate ≤ 1500 mrem/yr to any organ;
- h. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I;
- i. Limitations on the annual and quarterly doses to a member of the public from iodine-131, iodine-133, tritium, and all radionuclides in particulate form with half lives > 8 days in gaseous effluents released from each unit to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I; and
- j. Limitations on the annual dose or dose commitment to any member of the public, beyond the site boundary, due to releases of radioactivity and to radiation from uranium fuel cycle sources, conforming to 40 CFR 190.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Radioactive Effluent Controls Program Surveillance Frequencies.

5.5.4 Reactor Vessel Internals Vent Valves Program

A program shall be established to implement the testing of the reactor vessel internals vent valves every 24 months as follows:

- a. Verify by visual inspection that the valve body and valve disc exhibit no abnormal degradation;
- b. Verify the valve is not stuck in an open position; and
- c. Verify by manual actuation that the valve is fully open when a force of ≤ 400 lbs is applied vertically upward.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Reactor Vessel Internals Vent Valves Program test Frequencies.