



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

September 11, 2019

Mr. Keith Jury
Vice President, Regulatory Assurance
Entergy Services, LLC
M-ECH-61
1340 Echelon Parkway
Jackson, MS 39213

SUBJECT: ARKANSAS NUCLEAR ONE, UNITS 1 AND 2; GRAND GULF NUCLEAR STATION, UNIT 1; INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3; PALISADES NUCLEAR PLANT; RIVER BEND STATION, UNIT 1; WATERFORD STEAM ELECTRIC STATION, UNIT 3 – RE: ISSUANCE OF AMENDMENTS TO ADOPT TSTF-529, “CLARIFY USE AND APPLICATION RULES” (EPID L-2019-LLA-0013)

Dear Mr. Jury:

The U.S. Nuclear Regulatory Commission (the Commission) has issued amendments consisting of changes to the Technical Specifications (TSs) in response to your application dated January 31, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML19032A256), as supplemented by letter dated May 23, 2019 (ADAMS Accession No. ML19143A232). The following amendments are enclosed:

- Amendment Nos. 265 and 316 to Renewed Facility Operating License Nos. DPR-51 and NPF-6 for Arkansas Nuclear One, Units 1 and 2;
- Amendment No. 221 to Renewed Facility Operating License No. NPF-29 for Grand Gulf Nuclear Station, Unit 1;
- Amendment Nos. 291 and 266 to Facility Operating License Nos. DPR-26 and DPR-64 for Indian Point Nuclear Generating Unit Nos. 2 and 3;
- Amendment No. 270 to Renewed Facility Operating License No. DPR-20 for Palisades Nuclear Plant;
- Amendment No. 199 to Renewed Facility Operating License No. NPF-47 for River Bend Station, Unit 1; and
- Amendment No. 255 to Renewed Facility Operating License No. NPF-38 for Waterford 3 Steam Electric Station, Unit 3.

The amendments revise the TSs for each of these facilities based on Technical Specifications Task Force (TSTF) Traveler TSTF-529, Revision 4, "Clarify Use and Application Rules" (ADAMS Accession No. ML16062A271). The changes revise and clarify the TS usage rules for completion times, limiting conditions for operation, and surveillance requirements.

The amendments also made minor editorial changes to improve the clarity of several of the TS pages affected by the adoption of TSTF-529, Revision 4. For example, the licensee proposed to incorporate the word "continued" in the header and footer on several of the affected TS pages for the facilities to indicate that the TS section continues. Also, the licensee proposed incorporating the title of one of the affected TS pages, which was inadvertently deleted.

The amendment for Indian Point 3 made minor editorial corrections on page 3 of the Renewed Facility Operating License as follows:

- "Renewed license" replaces "amended license" throughout the page to reflect the Renewed Facility Operating License issued on September 17, 2018 (ADAMS Accession No. ML18213A114);
- "Appendix C" is reintroduced to paragraph 2.C.(2) (the Renewed Facility Operating License issued on September 17, 2018 had omitted the reference to Appendix C);
- In paragraph 2.C.(2) of the license, "license" is lowercased; and
- The following text in paragraph 2.F was removed: "of May 2, 1975, to Consolidated Edison Company of New York, Inc."

In addition, TS Pages 1.3-3 through 1.3-12 for Indian Point 2 are included for repagination purposes. TS Page 1.3-4 for ANO-1 and TS Page 3.0-4a for Grand Gulf were not issued as no changes were made to those pages.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

A handwritten signature in black ink, appearing to read "MO'Banion". The signature is fluid and cursive, with the first name "Margaret" and last name "O'Banion" written in a single continuous line.

Margaret W. O'Banion, Project Manager
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket Nos. 50-313, 50-368, 50-416, 50-247,
50-286, 50-255, 50-458, 50-382

Enclosures:

1. Amendment No. 265 to DPR-51
2. Amendment No. 316 to NPF-6
3. Amendment No. 221 to NPF-29
4. Amendment No. 291 to DPR-26
5. Amendment No. 266 to DPR-64
6. Amendment No. 270 to DPR-20
7. Amendment No. 199 to NPF-47
8. Amendment No. 255 to NPF-38
9. Safety Evaluation

cc: Listserv



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-313

ARKANSAS NUCLEAR ONE, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 265
Renewed License No. DPR-51

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Operations, Inc. (the licensee), dated January 31, 2019, as supplemented by letter dated May 23, 2019, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.c.(2) of Renewed Facility Operating License No. DPR-51 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 265, are hereby incorporated in the renewed license. EOI shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert J. Pascarelli, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License No. DPR-51
and Technical Specifications

Date of Issuance: September 11, 2019

ATTACHMENT TO LICENSE AMENDMENT NO. 265

ARKANSAS NUCLEAR ONE, UNIT 1

RENEWED FACILITY OPERATING LICENSE NO. DPR-51

DOCKET NO. 50-313

Replace the following pages of the Renewed Facility Operating License No. DPR-51 and Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Renewed Facility Operating License

REMOVE

INSERT

3

3

Technical Specifications

REMOVE

INSERT

1.3-1

1.3-1

1.3-2

1.3-2

1.3-3

1.3-3

1.3-5

1.3-5

1.3-6

1.3-6

1.3-7

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1.3-8

1.3-8

1.3-9

1.3-9

1.3-10

1.3-10

1.3-11

1.3-12

1.3-13

3.0-1

3.0-1

3.0-4

3.0-4

- (5) EOI, pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components;
 - (6) EOI, pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- c. This renewed license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- (1) Maximum Power Level
EOI is authorized to operate the facility at steady state reactor core power levels not in excess of 2568 megawatts thermal.
 - (2) Technical Specifications
The Technical Specifications contained in Appendix A, as revised through Amendment No. 265, are hereby incorporated in the renewed license. EOI shall operate the facility in accordance with the Technical Specifications.
 - (3) Safety Analysis Report
The licensee's SAR supplement submitted pursuant to 10 CFR 54.21(d), as revised on March 14, 2001, describes certain future inspection activities to be completed before the period of extended operation. The licensee shall complete these activities no later than May 20, 2014.
 - (4) Physical Protection
EOI shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans, including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Arkansas Nuclear One Physical Security Plan, Training and Qualifications Plan, and Safeguards Contingency Plan," as submitted on May 4, 2006.

1.0 USE AND APPLICATION

1.3 Completion Times

PURPOSE	The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.
BACKGROUND	Limiting Conditions for Operation (LCOs) specify minimum requirements for ensuring safe operation of the unit. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).
DESCRIPTION	<p>The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO.</p> <p>Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The "otherwise specified" exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, "AC Sources - Operating," Required Action B.2, requires declaring required feature(s) supported by an inoperable diesel generator, inoperable when the redundant required feature(s) are inoperable. The Completion Time states, "4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)." In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.</p> <p>Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability.</p>

1.3 Completion Times

DESCRIPTION (continued)

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the discovery of the situation that required entry into the Condition, unless otherwise specified.

Once a Condition has been entered, subsequent trains, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition, unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, unless otherwise specified.

However, when a subsequent train, subsystem, component, or variable, expressed in the Condition, is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

- a. Must exist concurrent with the first inoperability; and
- b. Must remain inoperable or not within limits after the first inoperability is resolved.

The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:

- a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours; or
- b. The stated Completion Time as measured from discovery of the subsequent inoperability.

The above Completion Time extensions do not apply to those Specifications that have exceptions that allow completely separate re-entry into the Condition (for each train, subsystem, component, or variable expressed in the Condition) and separate tracking of Completion Times based on this re-entry. These exceptions are stated in individual Specifications.

1.3 Completion Times (continued)

DESCRIPTION (continued)

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ." Example 1.3-3 illustrates one use of this type of Completion Time. The 10 day Completion Time specified for Conditions A and B in Example 1.3-3 may not be extended.

EXAMPLES

The following examples illustrate the use of Completion Times with different types of Conditions and changing Conditions.

EXAMPLE 1.3-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 5.	36 hours

Condition B has two Required Actions. Each Required Action has its own separate Completion Time. Each Completion Time is referenced to the time that Condition B is entered.

The Required Actions of Condition B are to be in MODE 3 within 6 hours AND in MODE 5 within 36 hours. A total of 6 hours is allowed for reaching MODE 3 and a total of 36 hours (not 42 hours) is allowed for reaching MODE 5 from the time that Condition B was entered. If MODE 3 is reached within 3 hours, the time allowed for reaching MODE 5 is the next 33 hours because the total time allowed for reaching MODE 5 is 36 hours.

If Condition B is entered while in MODE 3, the time allowed for reaching MODE 5 is the next 36 hours.

1.3 Completion Times

EXAMPLES (continued)

On restoring one of the pumps to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first pump was declared inoperable. This Completion Time may be extended if the pump restored to OPERABLE status was the first inoperable pump. A 24 hour extension to the stated 7 days is allowed, provided this does not result in the second pump being inoperable for > 7 days.

EXAMPLE 1.3-3

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Function X train inoperable.	A.1 Restore Function X train to OPERABLE status.	7 days <u>AND</u> 10 days from discovery of failure to meet the LCO
B. One Function Y train inoperable.	B.1 Restore Function Y train to OPERABLE status.	72 hours <u>AND</u> 10 days from discovery of failure to meet the LCO
C. One Function X train inoperable. <u>AND</u> One Function Y train inoperable.	C.1 Restore Function X train to OPERABLE status. <u>OR</u> C.2 Restore Function Y train to OPERABLE status.	72 hours 72 hours

1.3 Completion Times

EXAMPLES (continued)

When one Function X train and one Function Y train are inoperable, Condition A and Condition B are concurrently applicable. The Completion Times for Condition A and Condition B are tracked separately for each train starting from the time each train was declared inoperable and the Condition was entered. A separate Completion Time is established for Condition C and tracked from the time the second train was declared inoperable (i.e., the time the situation described in Condition C was discovered).

If Required Action C.2 is completed within the specified Completion Time, Conditions B and C are exited. If the Completion Time for Required Action A.1 has not expired, operation may continue in accordance with Condition A. The remaining Completion Time in Condition A is measured from the time the affected train was declared inoperable (i.e., initial entry into Condition A).

The Completion Times of Conditions A and B are modified by a logical connector, with a separate 10 day Completion Time measured from the time it was discovered the LCO was not met. In this example, without the separate Completion Time, it would be possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. The separate Completion Time modified by the phrase "from discovery of failure to meet the LCO" is designed to prevent indefinite continued operation while not meeting the LCO. This Completion Time allows for an exception to the normal "time zero" for beginning the Completion Time "clock." In this instance, the Completion Time "time zero" is specified as commencing at the time the LCO was initially not met, instead of at the time the associated Condition was entered.

1.3 Completion Times

EXAMPLES (continued)

EXAMPLE 1.3-4

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more valves inoperable.	A.1 Restore valve(s) to OPERABLE status.	4 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 4.	12 hours

A single Completion Time is used for any number of valves inoperable at the same time. The Completion Time associated with Condition A is based on the initial entry into Condition A and is not tracked on a per valve basis. Declaring subsequent valves inoperable, while Condition A is still in effect, does not trigger the tracking of separate Completion Times.

Once one of the valves has been restored to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first valve was declared inoperable. The Completion Time may be extended if the valve restored to OPERABLE status was the first inoperable valve. The Condition A Completion Time may be extended for up to 4 hours provided this does not result in any subsequent valve being inoperable for > 4 hours.

If the Completion Time of 4 hours (plus the extension) expires while one or more valves are still inoperable, Condition B is entered.

1.3 Completion Times

EXAMPLES (continued)

EXAMPLE 1.3-5

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each inoperable valve.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more valves inoperable.	A.1 Restore valve to OPERABLE status.	4 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 4.	12 hours

The Note above the ACTIONS Table is a method of modifying how the Completion Time is tracked. If this method of modifying how the Completion Time is tracked was applicable only to a specific Condition, the Note would appear in that Condition rather than at the top of the ACTIONS Table.

The Note allows Condition A to be entered separately for each inoperable valve, and Completion Times tracked on a per valve basis. When a valve is declared inoperable, Condition A is entered and its Completion Time starts. If subsequent valves are declared inoperable, Condition A is entered for each valve and separate Completion Times start and are tracked for each valve.

1.3 Completion Times

EXAMPLES (continued)

If the Completion Time associated with a valve in Condition A expires, Condition B is entered for that valve. If the Completion Times associated with subsequent valves in Condition A expire, Condition B is entered separately for each valve and separate Completion Times start and are tracked for each valve. If a valve that caused entry into Condition B is restored to OPERABLE status, Condition B is exited for that valve.

Since the Note in this example allows multiple Condition entry and tracking of separate Completion Times, Completion Time extensions do not apply.

EXAMPLE 1.3-6

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One channel inoperable.	A.1 Perform SR 3.x.x.x.	Once per 8 hours
	<u>OR</u> A.2 Reduce THERMAL POWER to ≤ 50% RTP.	8 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours

Entry into Condition A offers a choice between Required Action A.1 or A.2. Required Action A.1 has a "once per" Completion Time, which qualifies for the 25% extension, per SR 3.0.2, to each performance after the initial performance. The initial 8 hour interval of Required Action A.1 begins when Condition A is entered and the initial performance of Required Action A.1 must be complete within the first 8 hour interval. If Required Action A.1 is followed and the Required Action is not met within the Completion Time (plus the extension allowed by SR 3.0.2), Condition B is entered. If Required Action A.2 is followed and the Completion Time of 8 hours is not met, Condition B is entered.

If after entry into Condition B, Required Action A.1 or A.2 is met, Condition B is exited and operation may then continue in Condition A.

1.3 Completion Times

EXAMPLES (continued)

ACTIONS		
CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One subsystem inoperable.	A.1 Verify affected subsystem isolated.	1 hour <u>AND</u> Once per 8 hours thereafter
	<u>AND</u> A.2 Restore subsystem to OPERABLE status.	72 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 5.	36 hours

Required Action A.1 has two Completion Times. The 1 hour Completion Time begins at the time the Condition is entered and each "Once per 8 hours thereafter" interval begins upon performance of Required Action A.1.

If after Condition A is entered, Required Action A.1 is not met within either the initial 1 hour or any subsequent 8 hour interval from the previous performance (plus the extension allowed by SR 3.0.2), Condition B is entered. The Completion Time clock for Condition A does not stop after Condition B is entered, but continues from the time Condition A was initially entered. If Required Action A.1 is met after Condition B is entered, Condition B is exited and operation may continue in accordance with Condition A, provided the Completion Time for Required Action A.2 has not expired.

IMMEDIATE COMPLETION TIME When "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, LCO 3.0.8, and LCO 3.0.9.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

- a. MODE 3 within 7 hours;
- b. MODE 4 within 13 hours; and
- c. MODE 5 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENERGY OPERATIONS, INC.

DOCKET NO. 50-368

ARKANSAS NUCLEAR ONE, UNIT 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 316
Renewed License No. NPF-6

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Operations, Inc. (the licensee), dated January 31, 2019, as supplemented by letter dated May 23, 2019, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-6 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 316, are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert J. Pascarelli, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License No. NPF-6
Technical Specifications

Date of Issuance: September 11, 2019

ATTACHMENT TO LICENSE AMENDMENT NO. 316

ARKANSAS NUCLEAR ONE, UNIT 2

RENEWED FACILITY OPERATING LICENSE NO. NPF-6

DOCKET NO. 50-368

Replace the following pages of the Renewed Facility Operating License No. NPF-6 and Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Renewed Facility Operating License

REMOVE

-3-

INSERT

-3-

Technical Specifications

REMOVE

3/4 0-1

3/4 0-2

INSERT

3/4 0-1

3/4 0-2

- (4) EOI, pursuant to the Act and 10 CFR Parts 30, 40 and 70 to receive, possess and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (5) EOI, pursuant to the Act and 10 CFR Parts 30, 40 and 70 to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (6) EOI, pursuant to the Act and 10 CFR Parts 30 and 70 to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

C. This renewed license shall be deemed to contain and is subject to conditions specified in the following Commission regulations in 10 CFR Chapter I; Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

EOI is authorized to operate the facility at steady state reactor core power levels not in excess of 3026 megawatts thermal. Prior to attaining this power level EOI shall comply with the conditions in Paragraph 2.C.(3).

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 316, are hereby incorporated in the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications.

Exemptive 2nd paragraph of 2.C.2 deleted per Amendment 20, 3/3/81.

(3) Additional Conditions

The matters specified in the following conditions shall be completed to the satisfaction of the Commission within the stated time periods following issuance of the renewed license or within the operational restrictions indicated. The removal of these conditions shall be made by an amendment to the renewed license supported by a favorable evaluation by the Commission.

2.C.(3)(a) Deleted per Amendment 24, 6/19/81.

3/4 LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE REQUIREMENTS

3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

- 3.0.1 Limiting Conditions for Operation (LCO) and ACTION requirements shall be applicable during the OPERATIONAL MODES or other conditions specified for each specification, except as provided in LCO 3.0.2, LCO 3.0.8, and LCO 3.0.9.
- 3.0.2 Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the specification, except as provided in Specification 3.0.6. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required.
- 3.0.3 In the event a Limiting Condition for Operation and/or associated ACTION requirements cannot be satisfied because of circumstances in excess of those addressed in the specification within 1 hour, action shall be initiated to place the unit in a mode in which the specification does not apply by placing it, as applicable, in at least HOT STANDBY within 6 hours, in at least HOT SHUTDOWN within the next 6 hours, and in at least COLD SHUTDOWN within the following 24 hours unless corrective measures are completed that permit operation under the permissible ACTION statements for the specified time interval as measured from initial discovery or until the reactor is placed in a MODE in which the specification is not applicable. Exceptions to these requirements shall be stated in the individual specification.
- 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:
- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
 - b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or
 - c. When an allowance is stated in the individual value, parameter, or other Specification.

This specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

APPLICABILITY

SURVEILLANCE REQUIREMENTS

- 4.0.1 Surveillance Requirements shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the Surveillance. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified interval shall be failure to meet the LCO except as provided in 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.
- 4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.
- 4.0.3 If it is discovered that a Surveillance was not performed within its specified interval, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified interval, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable ACTION(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable ACTION(s) must be entered.

- 4.0.4 Entry into a MODE or other specified condition in the Applicability shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided in SR 4.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENTERGY OPERATIONS, INC.

SYSTEM ENERGY RESOURCES, INC.

COOPERATIVE ENERGY, A MISSISSIPPI ELECTRIC COOPERATIVE

ENTERGY MISSISSIPPI, LLC

DOCKET NO. 50-416

GRAND GULF NUCLEAR STATION, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 221
Renewed License No. NPF-29

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Operations, Inc. (the licensee), dated January 31, 2019, as supplemented by letter dated May 23, 2019, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-29 is hereby amended to read as follows:

- (2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 221 are hereby incorporated into this renewed license. Entergy Operations, Inc. shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert J. Pascarelli, Acting Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License No. NPF-29 and
the Technical Specifications

Date of Issuance: September 11, 2019

ATTACHMENT TO LICENSE AMENDMENT NO. 221

GRAND GULF NUCLEAR STATION, UNIT 1

RENEWED FACILITY OPERATING LICENSE NO. NPF-29

DOCKET NO. 50-416

Replace the following page of the Renewed Facility Operating License No. NPF-29 and the Appendix A, Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Facility Operating License

Remove

Insert

-4-

-4-

Technical Specifications

Remove

Insert

1.0-11

1.0-11

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1.0-11a

3.0-2

3.0-2

3.0-4

3.0-4

amended, are fully applicable to the lessors and any successors in interest to those lessors, as long as the renewed license of GGNS Unit 1 remains in effect.

- (b) SERI is required to notify the NRC in writing prior to any change in (i) the terms or conditions of any new or existing sale or lease agreements executed as part of the above authorized financial transactions, (ii) the GGNS Unit 1 operating agreement, (iii) the existing property insurance coverage for GGNS Unit 1 that would materially alter the representations and conditions set forth in the Staff's Safety Evaluation Report dated December 19, 1988 attached to Amendment No. 54. In addition, SERI is required to notify the NRC of any action by a lessor or other successor in interest to SERI that may have an effect on the operation of the facility.

C. The renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

Entergy Operations, Inc. is authorized to operate the facility at reactor core power levels not in excess of 4408 megawatts thermal (100 percent power) in accordance with the conditions specified herein.

(2) Technical Specifications

The Technical Specifications contained in Appendix A and the Environmental Protection Plan contained in Appendix B, as revised through Amendment No. 221 are hereby incorporated into this renewed license. Entergy Operations, Inc. shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

During Cycle 19, GGNS will conduct monitoring of the Oscillation Power Range Monitor (OPRM). During this time, the OPRM Upscale function (Function 2.f of Technical Specification Table 3.3.1.1-1) will be disabled and operated in an "indicate only" mode and technical specification requirements will not apply to this function. During such time, Backup Stability Protection measures will be implemented via GGNS procedures to provide an alternate method to detect and suppress reactor core thermal hydraulic instability oscillations. Once monitoring has been successfully completed, the OPRM Upscale function will be enabled and technical specification requirements will be applied to the function; no further operating with this function in an "indicate only" mode will be conducted.

1.0 USE AND APPLICATION

1.3 Completion Times

PURPOSE	The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.
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BACKGROUND	Limiting Conditions for Operation (LCOs) specify minimum requirements for ensuring safe operation of the unit. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).
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DESCRIPTION	<p>The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO.</p> <p>Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The "otherwise specified" exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, "AC Sources-Operating," Required Action B.2, requires declaring required feature(s) supported by an inoperable diesel generator, inoperable when the redundant required feature(s) are inoperable. The Completion Time states, "4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)." In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.</p>
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(continued)

1.3 Completion Times

DESCRIPTION
(continued)

Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability.

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the discovery of the situation that required entry into the Condition, unless otherwise specified.

Once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, unless otherwise specified.

(continued)

3.0 LCO APPLICABILITY

LCO 3.0.4
(continued)

- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or
- c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.10, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

(continued)

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

(continued)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENERGY NUCLEAR INDIAN POINT 2, LLC

AND ENERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-247

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 291
Renewed License No. DPR-26

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Nuclear Operations, Inc. (ENO, the licensee) dated January 31, 2019, as supplemented by letter dated May 23, 2019, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. DPR-26 is hereby amended to read as follows:

- (2) Technical Specifications

- The Technical Specifications contained in Appendices A, B, and C, as revised through Amendment No. 291, are hereby incorporated in the renewed license. ENO shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert J. Pascarelli, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility Operating
License and Technical Specifications

Date of Issuance: September 11, 2019

ATTACHMENT TO LICENSE AMENDMENT NO. 291

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

RENEWED FACILITY OPERATING LICENSE NO. DPR-26

DOCKET NO. 50-247

Replace the following page of the Renewed Facility Operating License with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the areas of change.

Remove Page
3

Insert Page
3

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages

1.3-1
1.3-2
1.3-3
1.3-4
1.3-5
1.3-6
1.3-7
1.3-8
1.3-9
1.3-10
1.3-11
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3.0-2
3.0-4

Insert Pages

1.3-1
1.3-2
1.3-3
1.3-4
1.3-5
1.3-6
1.3-7
1.3-8
1.3-9
1.3-10
1.3-11
1.3-12
3.0-2
3.0-4

- (3) ENO pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess and use, at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required; Amdt. 42
10-17-78
- (4) ENO pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; Amdt. 42
10-17-78
- (5) ENO pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility. Amdt. 220
09-06-01

C. This renewed license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

ENO is authorized to operate the facility at steady state reactor core power levels not in excess of 3216 megawatts thermal. Amdt. 241
10-27-04

(2) Technical Specifications

The Technical Specifications contained in Appendices A, B, and C, as revised through Amendment No. 291, are hereby incorporated in the renewed license. ENO shall operate the facility in accordance with the Technical Specifications.

(3) The following conditions relate to the amendment approving the conversion to Improved Standard Technical Specifications:

- 1. This amendment authorizes the relocation of certain Technical Specification requirements and detailed information to licensee controlled documents as described in Table R, "Relocated Technical Specifications from the CTS," and Table LA, "Removed Details and Less Restrictive Administrative Changes to the CTS" attached to the NRC staff's Safety Evaluation enclosed with this amendment. The relocation of requirements and detailed information shall be completed on or before the implementation of this amendment.

1.0 USE AND APPLICATION

1.3 Completion Times

PURPOSE The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.

BACKGROUND Limiting Conditions for Operation (LCOs) specify minimum requirements for ensuring safe operation of the unit. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).

DESCRIPTION The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO.

Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The "otherwise specified" exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, "AC Sources - Operating," Required Action B.2, requires declaring required feature(s) supported by an inoperable diesel generator, inoperable when the redundant required feature(s) is inoperable. The Completion Time states, "4 hours from discovery of Condition B concurrent with inoperability of redundant required feature." In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.

Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability.

(continued)

1.3 Completion Times
DESCRIPTION (continued)

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the discovery of the situation that required entry into the Condition, unless otherwise specified.

Once a Condition has been entered, subsequent trains, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition, unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, unless otherwise specified.

However, when a subsequent train, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

- a. Must exist concurrent with the first inoperability and
- b. Must remain inoperable or not within limits after the first inoperability is resolved.

The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:

- a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours or
- b. The stated Completion Time as measured from discovery of the subsequent inoperability.

The above Completion Time extensions do not apply to those Specifications that have exceptions that allow completely separate re-entry into the Condition (for each train, subsystem, component, or variable expressed in the Condition) and separate tracking of Completion Times based on this re-entry. These exceptions are stated in individual Specifications.

(continued)

1.3 Completion Times

DESCRIPTION (continued)

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ." Example 1.3-3 illustrates one use of this type of Completion Time. The 10 day Completion Time specified for Conditions A and B in Example 1.3-3 may not be extended.

(continued)

1.3 Completion Times

EXAMPLES

The following examples illustrate the use of Completion Times with different types of Conditions and changing Conditions.

EXAMPLE 1.3-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. <u>AND</u>	6 hours
	B.2 Be in MODE 5.	36 hours

Condition B has two Required Actions. Each Required Action has its own separate Completion Time. Each Completion Time is referenced to the time that Condition B is entered.

The Required Actions of Condition B are to be in MODE 3 within 6 hours AND in MODE 5 within 36 hours. A total of 6 hours is allowed for reaching MODE 3 and a total of 36 hours (not 42 hours) is allowed for reaching MODE 5 from the time that Condition B was entered. If MODE 3 is reached within 3 hours, the time allowed for reaching MODE 5 is the next 33 hours because the total time allowed for reaching MODE 5 is 36 hours.

If Condition B is entered while in MODE 3, the time allowed for reaching MODE 5 is the next 36 hours.

(continued)

1.3 Completion Times
EXAMPLES (continued)

EXAMPLE 1.3-2

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One pump inoperable.	A.1 Restore pump to OPERABLE status.	7 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 5.	36 hours

When a pump is declared inoperable, Condition A is entered. If the pump is not restored to OPERABLE status within 7 days, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the inoperable pump is restored to OPERABLE status after Condition B is entered, Condition A and B are exited, and therefore, the Required Actions of Condition B may be terminated.

When a second pump is declared inoperable while the first pump is still inoperable, Condition A is not re-entered for the second pump. LCO 3.0.3 is entered, since the ACTIONS do not include a Condition for more than one inoperable pump. The Completion Time clock for Condition A does not stop after LCO 3.0.3 is entered, but continues to be tracked from the time Condition A was initially entered.

While in LCO 3.0.3, if one of the inoperable pumps is restored to OPERABLE status and the Completion Time for Condition A has not expired, LCO 3.0.3 may be exited and operation continued in accordance with Condition A.

(continued)

1.3 Completion Times

EXAMPLES (continued)

While in LCO 3.0.3, if one of the inoperable pumps is restored to OPERABLE status and the Completion Time for Condition A has expired, LCO 3.0.3 may be exited and operation continued in accordance with Condition B. The Completion Time for Condition B is tracked from the time the Condition A Completion Time expired.

On restoring one of the pumps to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first pump was declared inoperable. This Completion Time may be extended if the pump restored to OPERABLE status was the first inoperable pump. A 24 hour extension to the stated 7 days is allowed, provided this does not result in the second pump being inoperable for > 7 days.

(continued)

1.3 Completion Times
EXAMPLES (continued)

EXAMPLE 1.3-3

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Function X train inoperable.	A.1 Restore Function X train to OPERABLE status.	7 days <u>AND</u> 10 days from discovery of failure to meet the LCO
B. One Function Y train inoperable.	B.1 Restore Function Y train to OPERABLE status.	72 hours <u>AND</u> 10 days from discovery of failure to meet the LCO
C. One Function X train inoperable. <u>AND</u> One Function Y train inoperable.	C.1 Restore Function X train to OPERABLE status. <u>OR</u> C.2 Restore Function Y train to OPERABLE status.	72 hours 72 hours

When one Function X train and one Function Y train are inoperable, Condition A and Condition B are concurrently applicable. The Completion Times for Condition A and Condition B are tracked separately for each train starting from the time each train was declared inoperable and the Condition was entered. A separate Completion Time is established for Condition C and tracked from the time the second train was declared inoperable (i.e., the time the situation described in Condition C was discovered).

(continued)

1.3 Completion Times

EXAMPLES (continued)

If Required Action C.2 is completed within the specified Completion Time, Conditions B and C are exited. If the Completion Time for Required Action A.1 has not expired, operation may continue in accordance with Condition A. The remaining Completion Time in Condition A is measured from the time the affected train was declared inoperable (i.e., initial entry into Condition A).

The Completion Times of Conditions A and B are modified by a logical connector with a separate 10 day Completion Time measured from the time it was discovered the LCO was not met. In this example, without the separate Completion Time, it would be possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. The separate Completion Time modified by the phrase "from discovery of failure to meet the LCO" is designed to prevent indefinite continued operation while not meeting the LCO. This Completion Time allows for an exception to the normal "time zero" for beginning the Completion Time "clock." In this instance, the Completion Time "time zero" is specified as commencing at the time the LCO was initially not met, instead of at the time the associated Condition was entered.

(continued)

1.3 Completion Times

EXAMPLES (continued)

EXAMPLE 1.3-4

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more valves inoperable.	A.1 Restore valve(s) to OPERABLE status.	4 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 4.	12 hours

A single Completion Time is used for any number of valves inoperable at the same time. The Completion Time associated with Condition A is based on the initial entry into Condition A and is not tracked on a per valve basis. Declaring subsequent valves inoperable, while Condition A is still in effect, does not trigger the tracking of separate Completion Times.

Once one of the valves has been restored to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first valve was declared inoperable. The Completion Time may be extended if the valve restored to OPERABLE status was the first inoperable valve. The Condition A Completion Time may be extended for up to 4 hours provided this does not result in any subsequent valve being inoperable for > 4 hours.

If the Completion Time of 4 hours (including the extension) expires while one or more valves are still inoperable, Condition B is entered.

(continued)

1.3 Completion Times

EXAMPLES (continued)

EXAMPLE 1.3-5

ACTIONS

- NOTE -

Separate Condition entry is allowed for each inoperable valve.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more valves inoperable.	A.1 Restore valve to OPERABLE status.	4 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	4 hours
	<u>AND</u> B.2 Be in MODE 4.	12 hours

Note above the ACTIONS Table is a method of modifying how the Completion Time is tracked. If this method of modifying how the Completion Time is tracked was applicable only to a specific Condition, the Note would appear in that Condition rather than at the top of the ACTIONS Table.

The Note allows Condition A to be entered separately for each inoperable valve, and Completion Times tracked on a per valve basis. When a valve is declared inoperable, Condition A is entered and its Completion Time starts. If subsequent valves are declared inoperable, Condition A is entered for each valve and separate Completion Times start and are tracked for each valve.

If the Completion Time associated with a valve in Condition A expires, Condition B is entered for that valve. If the Completion Times associated with subsequent valves in Condition A expire, Condition B is entered separately for each valve and separate Completion Times start and are tracked for each valve. If a valve that caused entry into Condition B is restored to OPERABLE status, Condition B is exited for that valve.

Since the Note in this example allows multiple Condition entry and tracking of separate Completion Times, Completion Time extensions do not apply.

(continued)

1.3 Completion Times
EXAMPLES (continued)

EXAMPLE 1.3-6

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One channel inoperable.	A.1 Perform SR 3.x.x.x.	Once per 8 hours
	<u>OR</u> A.2 Reduce THERMAL POWER to ≤ 50% RTP.	8 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours

Entry into Condition A offers a choice between Required Action A.1 or A.2. Required Action A.1 has a "once per" Completion Time, which qualifies for the 25% extension, per SR 3.0.2, to each performance after the initial performance. The initial 8 hour interval of Required Action A.1 begins when Condition A is entered and the initial performance of Required Action A.1 must be complete within the first 8 hour interval. If Required Action A.1 is followed, and the Required Action is not met within the Completion Time (plus the extension allowed by SR 3.0.2), Condition B is entered. If Required Action A.2 is followed and the Completion Time of 8 hours is not met, Condition B is entered.

If after entry into Condition B, Required Action A.1 or A.2 is met, Condition B is exited and operation may then continue in Condition A.

(continued)

1.3 Completion Times
EXAMPLES (continued)

EXAMPLE 1.3-7

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One subsystem inoperable.	A.1 Verify affected subsystem isolated.	1 hour <u>AND</u> Once per 8 hours thereafter
	<u>AND</u> A.2 Restore subsystem to OPERABLE status.	72 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 5.	36 hours

Required Action A.1 has two Completion Times. The 1 hour Completion Time begins at the time the Condition is entered and each "Once per 8 hours thereafter" interval begins upon performance of Required Action A.1.

If after Condition A is entered, Required Action A.1 is not met within either the initial 1 hour or any subsequent 8 hour interval from the previous performance (plus the extension allowed by SR 3.0.2), Condition B is entered. The Completion Time clock for Condition A does not stop after Condition B is entered, but continues from the time Condition A was initially entered. If Required Action A.1 is met after Condition B is entered, Condition B is exited and operation may continue in accordance with Condition A, provided the Completion Time for Required Action A.2 has not expired.

IMMEDIATE COMPLETION TIME When "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.

3.0 LCO Applicability
LCO 3.0.4 (continued)

- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or
- c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Technical Specification 5.5.13, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENTERGY NUCLEAR INDIAN POINT 3, LLC

AND ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-286

INDIAN POINT NUCLEAR GENERATING UNIT NO. 3

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 266
Renewed License No. DPR-64

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Nuclear Operations, Inc. (ENO, the licensee) dated January 31, 2019, as supplemented by letter dated May 23, 2019, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. DPR-64 is hereby amended to read as follows:

- (2) Technical Specifications

- The Technical Specifications contained in Appendices A, B, and C, as revised through Amendment No. 266, are hereby incorporated in the renewed license. ENO shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert J. Pascarelli, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility Operating
License and Technical Specifications

Date of Issuance September 11, 2019

ATTACHMENT TO LICENSE AMENDMENT NO. 266

INDIAN POINT NUCLEAR GENERATING UNIT NO. 3

RENEWED FACILITY OPERATING LICENSE NO. DPR-64

DOCKET NO. 50-286

Replace the following page of the License with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the areas of change.

Remove Page

3

Insert Page

3

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove Pages

1.3-1
1.3-2
1.3-3
1.3-4
1.3-5
1.3-6
1.3-7
1.3-8
1.3-9
1.3-10
1.3-11
1.3-12
1.3-13

3.0-2
3.0-4

Insert Pages

1.3-1
1.3-2
1.3-3
1.3-4
1.3-5
1.3-6
1.3-7
1.3-8
1.3-9
1.3-10
1.3-11
1.3-12
1.3-13
1.3-14
3.0 2
3.0-4

- (4) ENO pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration; or associated with radioactive apparatus or components. Amdt. 203
11/27/00
- (5) ENO pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility. Amdt. 203
11/27/00

C. This renewed license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified below:

(1) Maximum Power Level

ENO is authorized to operate the facility at steady state reactor core power levels not in excess of 3216 megawatts thermal (100% of rated power).

(2) Technical Specifications

The Technical Specifications contained in Appendices A, B, and C, as revised through Amendment No. 266, are hereby incorporated in the renewed license. ENO shall operate the facility in accordance with the Technical Specifications.

(3) (DELETED) Amdt. 205
2-27-01

(4) (DELETED) Amdt. 205
2-27-01

D. (DELETED) Amdt. 46
2-16-83

E. (DELETED) Amdt. 37
5-14-81

F. This renewed license is also subject to appropriate conditions by the New York State Department of Environmental Conservation in its letter granting a Section 401 certification under the Federal Water Pollution Control Act Amendments of 1972.

1.0 USE AND APPLICATION

1.3 Completion Times

PURPOSE The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.

BACKGROUND Limiting Conditions for Operation (LCOs) specify minimum requirements for ensuring safe operation of the unit. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).

DESCRIPTION The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO.

Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The "otherwise specified" exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, "AC Sources - Operating," Required Action B.2, requires declaring required features supported by an inoperable diesel generator, inoperable when the redundant required feature is inoperable. The Completion Time states, "4 hours from discovery of Condition B concurrent with inoperability of redundant required feature." In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.

(continued)

1.3 Completion Times

DESCRIPTION
(continued)

Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability.

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the discovery of the situation that required entry into the Condition, unless otherwise specified.

Once a Condition has been entered, subsequent trains, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition, unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, unless otherwise specified.

However, when a subsequent train, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

- a. Must exist concurrent with the first inoperability; and
- b. Must remain inoperable or not within limits after the first inoperability is resolved.

The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:

- a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours;
or
- b. The stated Completion Time as measured from discovery of the subsequent inoperability.

(continued)

1.3 Completion Times

DESCRIPTION
(continued)

The above Completion Time extensions do not apply to those Specifications that have exceptions that allow completely separate re-entry into the Condition (for each train, subsystem, component, or variable expressed in the Condition) and separate tracking of Completion Times based on this re-entry. These exceptions are stated in individual Specifications.

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery..." Example 1.3-3 illustrates one use of this type of Completion Time. The 10 day Completion Time specified for Conditions A and B in Example 1.3-3 may not be extended.

(continued)

1.3 Completion Times (continued)

EXAMPLES

The following examples illustrate the use of Completion Times with different types of Conditions and changing Conditions.

EXAMPLE 1.3-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 5.	36 hours

Condition B has two Required Actions. Each Required Action has its own separate Completion Time. Each Completion Time is referenced to the time that Condition B is entered.

The Required Actions of Condition B are to be in MODE 3 within 6 hours AND in MODE 5 within 36 hours. A total of 6 hours is allowed for reaching MODE 3 and a total of 36 hours (not 42 hours) is allowed for reaching MODE 5 from the time that Condition B was entered. If MODE 3 is reached within 3 hours, the time allowed for reaching MODE 5 is the next 33 hours because the total time allowed for reaching MODE 5 is 36 hours.

If Condition B is entered while in MODE 3, the time allowed for reaching MODE 5 is the next 36 hours.

(continued)

1.3 Completion Times

EXAMPLES
(continued)

EXAMPLE 1.3-2

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One pump inoperable.	A.1 Restore pump to OPERABLE status.	7 days
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 5.	36 hours

When a pump is declared inoperable, Condition A is entered. If the pump is not restored to OPERABLE status within 7 days, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the inoperable pump is restored to OPERABLE status after Condition B is entered, Condition A and B are exited, and therefore, the Required Actions of Condition B may be terminated.

When a second pump is declared inoperable while the first pump is still inoperable, Condition A is not re-entered for the second pump. LCO 3.0.3 is entered, since the ACTIONS do not include a Condition for more than one inoperable pump. The Completion Time clock for Condition A does not stop after LCO 3.0.3 is entered, but continues to be tracked from the time Condition A was initially entered.

While in LCO 3.0.3, if one of the inoperable pumps is restored to OPERABLE status and the Completion Time for Condition A has not expired, LCO 3.0.3 may be exited and operation continued in accordance with Condition A.

(continued)

1.3 Completion Times

EXAMPLES

EXAMPLE 1.3-2 (continued)

While in LCO 3.0.3, if one of the inoperable pumps is restored to OPERABLE status and the Completion Time for Condition A has expired, LCO 3.0.3 may be exited and operation continued in accordance with Condition B. The Completion Time for Condition B is tracked from the time the Condition A Completion Time expired.

On restoring one of the pumps to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first pump was declared inoperable. This Completion Time may be extended if the pump restored to OPERABLE status was the first inoperable pump. A 24 hour extension to the stated 7 days is allowed, provided this does not result in the second pump being inoperable for > 7 days.

(continued)

1.3 Completion Times

EXAMPLES
(continued)

EXAMPLE 1.3-3

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Function X train inoperable.	A.1 Restore Function X train to OPERABLE status.	7 days <u>AND</u> 10 days from discovery of failure to meet the LCO
B. One Function Y train inoperable.	B.1 Restore Function Y train to OPERABLE status.	72 hours <u>AND</u> 10 days from discovery of failure to meet the LCO
C. One Function X train inoperable. <u>AND</u> One Function Y train inoperable.	C.1 Restore Function X train to OPERABLE status. <u>OR</u> C.2 Restore Function Y train to OPERABLE status.	72 hours 72 hours

(continued)

1.3 Completion Times

EXAMPLES

EXAMPLE 1.3-3 (continued)

When one Function X train and one Function Y train are inoperable, Condition A and Condition B are concurrently applicable. The Completion Times for Condition A and Condition B are tracked separately for each train starting from the time each train was declared inoperable and the Condition was entered. A separate Completion Time is established for Condition C and tracked from the time the second train was declared inoperable (i.e., the time the situation described in Condition C was discovered).

If Required Action C.2 is completed within the specified Completion Time, Conditions B and C are exited. If the Completion Time for Required Action A.1 has not expired, operation may continue in accordance with Condition A. The remaining Completion Time in Condition A is measured from the time the affected train was declared inoperable (i.e., initial entry into Condition A).

The Completion Times of Conditions A and B are modified by a logical connector with a separate 10 day Completion Time measured from the time it was discovered the LCO was not met. In this example, without the separate Completion Time, it would be possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. The separate Completion Time modified by the phrase "from discovery of failure to meet the LCO" is designed to prevent indefinite continued operation while not meeting the LCO. This Completion Time allows for an exception to the normal "time zero" for beginning the Completion Time "clock". In this instance, the Completion Time "time zero" is specified as commencing at the time the LCO was initially not met, instead of at the time the associated Condition was entered.

(continued)

1.3 Completion Times

EXAMPLES
(continued)

EXAMPLE 1.3-4

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more valves inoperable.	A.1 Restore valve(s) to OPERABLE status.	4 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 4.	12 hours

A single Completion Time is used for any number of valves inoperable at the same time. The Completion Time associated with Condition A is based on the initial entry into Condition A and is not tracked on a per valve basis. Declaring subsequent valves inoperable, while Condition A is still in effect, does not trigger the tracking of separate Completion Times.

Once one of the valves has been restored to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first valve was declared inoperable. The Completion Time may be extended if the valve restored to OPERABLE status was the first inoperable valve. The Condition A Completion Time may be extended for up to 4 hours provided this does not result in any subsequent valve being inoperable for > 4 hours.

If the Completion Time of 4 hours (including the extension) expires while one or more valves are still inoperable, Condition B is entered.

(continued)

1.3 Completion Times

EXAMPLES
(continued)

EXAMPLE 1.3-5

ACTIONS

-----NOTE-----
Separate Condition entry is allowed for each inoperable valve.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more valves inoperable.	A.1 Restore valve to OPERABLE status.	4 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 4.	12 hours

The Note above the ACTIONS Table is a method of modifying how the Completion Time is tracked. If this method of modifying how the Completion Time is tracked was applicable only to a specific Condition, the Note would appear in that Condition rather than at the top of the ACTIONS Table.

The Note allows Condition A to be entered separately for each inoperable valve, and Completion Times tracked on a per valve basis. When a valve is declared inoperable, Condition A is entered and its Completion Time starts. If subsequent valves are declared inoperable, Condition A is entered for each valve and separate Completion Times start and are tracked for each valve.

(continued)

1.3 Completion Times

EXAMPLES

EXAMPLE 1.3-5 (continued)

If the Completion Time associated with a valve in Condition A expires, Condition B is entered for that valve. If the Completion Times associated with subsequent valves in Condition A expire, Condition B is entered separately for each valve and separate Completion Times start and are tracked for each valve. If a valve that caused entry into Condition B is restored to OPERABLE status, Condition B is exited for that valve.

Since the Note in this example allows multiple Condition entry and tracking of separate Completion Times, Completion Time extensions do not apply.

EXAMPLE 1.3-6

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One channel inoperable.	A.1 Perform SR 3.x.x.x.	Once per 8 hours
	<u>OR</u> A.2 Reduce THERMAL POWER to \leq 50% RTP.	8 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours

(continued)

1.3 Completion Times

EXAMPLES

EXAMPLE 1.3-6 (continued)

Entry into Condition A offers a choice between Required Action A.1 or A.2. Required Action A.1 has a "once per" Completion Time, which qualifies for the 25% extension, per SR 3.0.2, to each performance after the initial performance. The initial 8 hour interval of Required Action A.1 begins when Condition A is entered and the initial performance of Required Action A.1 must be complete within the first 8 hour interval. If Required Action A.1 is followed, and the Required Action is not met within the Completion Time (plus the extension allowed by SR 3.0.2), Condition B is entered. If Required Action A.2 is followed and the Completion Time of 8 hours is not met, Condition B is entered.

If after entry into Condition B, Required Action A.1 or A.2 is met, Condition B is exited and operation may then continue in Condition A.

(continued)

1.3 Completion Times

EXAMPLES
(continued)

EXAMPLE 1.3-7

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One subsystem inoperable.	A.1 Verify affected subsystem isolated.	1 hour <u>AND</u> Once per 8 hours thereafter
	<u>AND</u> A.2 Restore subsystem to OPERABLE status.	72 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 5.	36 hours

Required Action A.1 has two Completion Times. The 1 hour Completion Time begins at the time the Condition is entered and each "Once per 8 hours thereafter" interval begins upon performance of Required Action A.1.

(continued)

1.3 Completion Times

EXAMPLES

EXAMPLE 1.3-7 (continued)

If after Condition A is entered, Required Action A.1 is not met within either the initial 1 hour or any subsequent 8 hour interval from the previous performance (plus the extension allowed by SR 3.0.2), Condition B is entered. The Completion Time clock for Condition A does not stop after Condition B is entered, but continues from the time Condition A was initially entered. If Required Action A.1 is met after Condition B is entered, Condition B is exited and operation may continue in accordance with Condition A, provided the Completion Time for Required Action A.2 has not expired.

IMMEDIATE COMPLETION TIME

When "Immediately" is used as a Completion Time, the Required Action should be pursued without delay and in a controlled manner.

3.0 LCO APPLICABILITY (continued)

- LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:
- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
 - b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or
 - c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

-
- LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

(continued)

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

(continued)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-255

PALISADES NUCLEAR PLANT

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 270
License No. DPR-20

1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Nuclear Operations, Inc. (ENO, the licensee), dated January 31, 2019, as supplemented by letter dated May 23, 2019, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public; and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to the license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. DPR-20 is hereby amended to read as follows:

The Technical Specifications contained in Appendix A, as revised through Amendment No. 270, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. ENO shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of the date of issuance and shall be implemented within 90 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert J. Pascarelli, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License No. DPR-20
and Technical Specifications

Date of Issuance: September 11, 2019

ATTACHMENT TO LICENSE AMENDMENT NO. 270

PALISADES NUCLEAR PLANT

RENEWED FACILITY OPERATING LICENSE NO. DPR-20

DOCKET NO. 50-255

Replace the following page of the Renewed Facility Operating License No. DPR-20 with the attached revised page. The revised page is identified by amendment number and contains marginal lines indicating the area of change.

REMOVE
Page 3

INSERT
Page 3

Replace the following pages of Appendix A, Technical Specifications, with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

INSERT

1.3-1
1.3-2
1.3-3
3.0-2
3.0-5

1.3-1
1.3-2
1.3-3
3.0-2
3.0-5

- (1) Pursuant to Section 104b of the Act, as amended, and 10 CFR Part 50, "Licensing of Production and Utilization Facilities," (a) ENP to possess and use, and (b) ENO to possess, use and operate, the facility as a utilization facility at the designated location in Van Buren County, Michigan, in accordance with the procedures and limitation set forth in this license;
 - (2) ENO, pursuant to the Act and 10 CFR Parts 40 and 70, to receive, possess, and use source and special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Updated Final Safety Analysis Report, as supplemented and amended;
 - (3) ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use byproduct, source, and special nuclear material as sealed sources for reactor startup, reactor instrumentation, radiation monitoring equipment calibration, and fission detectors in amounts as required;
 - (4) ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material for sample analysis or instrument calibration, or associated with radioactive apparatus or components; and
 - (5) ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operations of the facility.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations in 10 CFR Chapter I and is subject to all applicable provisions of the Act; to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- (1) ENO is authorized to operate the facility at steady-state reactor core power levels not in excess of 2565.4 Megawatts thermal (100 percent rated power) in accordance with the conditions specified herein.
 - (2) The Technical Specifications contained in Appendix A, as revised through Amendment No. 270, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. ENO shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.
 - (3) Fire Protection
ENO shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the license amendment requests dated December 12, 2012, November 1, 2017, November 1, 2018, and March 8, 2019, as supplemented by letters dated February 21, 2013, September 30, 2013, October 24, 2013,

1.0 USE AND APPLICATION

1.3 Completion Times

PURPOSE The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.

BACKGROUND Limiting Conditions for Operation (LCOs) specify minimum requirements for ensuring safe operation of the plant. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).

DESCRIPTION The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the plant is in a MODE or specified condition stated in the Applicability of the LCO.

Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The "otherwise specified" exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, "AC Sources - Operating," Required Action B.2, requires declaring required feature(s) supported by an inoperable diesel generator, inoperable when the redundant required feature(s) are inoperable. The Completion Time states, "4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)." In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.

Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the plant is not within the LCO Applicability.

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the

1.3 Completion Times

DESCRIPTION
(continued)

associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the discovery of the situation that required entry into the Condition, unless otherwise specified.

Once a Condition has been entered, subsequent trains, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition, unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, unless otherwise specified.

However, when a subsequent train, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

- a. Must exist concurrent with the first inoperability; and
- b. Must remain inoperable or not within limits after the first inoperability is resolved.

The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:

- a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours; or
- b. The stated Completion Time as measured from discovery of the subsequent inoperability.

The above Completion Time extensions do not apply to those Specifications that have exceptions that allow completely separate re-entry into the Condition (for each train, subsystem, component, or variable expressed in the Condition) and separate tracking of Completion Times based on this re-entry. These exceptions are stated in individual Specifications.

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ." Example 1.3-3 illustrates one use of

1.3 Completion Times

DESCRIPTION (continued) this type of Completion Time. The 10 day Completion Time specified for Conditions A and B in Example 1.3-3 may not be extended.

EXAMPLES The following examples illustrate the use of Completion Times with different types of Conditions and changing Conditions.

EXAMPLE 1.3-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 5.	36 hours

Condition B has two Required Actions. Each Required Action has its own separate Completion Time. Each Completion Time is referenced to the time that Condition B is entered.

The Required Actions of Condition B are to be in MODE 3 within 6 hours AND in MODE 5 within 36 hours. A total of 6 hours is allowed for reaching MODE 3 and a total of 36 hours (not 42 hours) is allowed for reaching MODE 5 from the time that Condition B was entered. If MODE 3 is reached within 3 hours, the time allowed for reaching MODE 5 is the next 33 hours because the total time allowed for reaching MODE 5 is 36 hours.

If Condition B is entered while in MODE 3, the time allowed for reaching MODE 5 is the next 36 hours.

3.0 LCO APPLICABILITY

LCO 3.0.4 (continued)

- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or
- c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the plant.

LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.13, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered. When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENERGY LOUISIANA, LLC

AND

ENERGY OPERATIONS, INC.

DOCKET NO. 50-458

RIVER BEND STATION, UNIT 1

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 199
Renewed License No. NPF-47

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Operations, Inc. (EOI, the licensee) dated January 31, 2019, as supplemented by letter dated May 23, 2019, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this license amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Renewed Facility Operating License No. NPF-47 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 199 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. EOI shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert J. Pascarelli, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility
Operating License No. NPF-47 and
Technical Specifications

Date of Issuance: September 11, 2019

ATTACHMENT TO LICENSE AMENDMENT NO. 199

RIVER BEND STATION, UNIT 1

RENEWED FACILITY OPERATING LICENSE NO. NPF-47

DOCKET NO. 50-458

Replace the following pages of the Renewed Facility Operating License No. NPF-47 and Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by Amendment number and contain marginal lines indicating the areas of change.

Renewed Facility Operating License

Remove

-3-

Insert

-3-

Technical Specifications

Remove

1.0-11

1.0-12

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3.0-2

3.0-4

Insert

1.0-11

1.0-12

1.0-12a

3.0-2

3.0-4

- (2) EOI, pursuant to Section 103 of the Act and 10 CFR Part 50, to possess, use and operate the facility at the above designated location in accordance with the procedures and limitations set forth in this renewed license;
- (3) EOI, pursuant to Section 103 of the Act and 10 CFR Part 70, to receive, possess and to use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;
- (4) EOI, pursuant to Section 103 of the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use at any time any byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
- (5) EOI, pursuant to Section 103 of the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (6) EOI, pursuant to Section 103 of the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.

C. This renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

EOI is authorized to operate the facility at reactor core power levels not in excess of 3091 megawatts thermal (100% rated power) in accordance with the conditions specified herein.

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 199 and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. EOI shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

1.0 USE AND APPLICATION

1.3 Completion Times

PURPOSE	The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.
<hr/>	
BACKGROUND	Limiting Conditions for Operation (LCOs) specify minimum requirements for ensuring safe operation of the unit. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).
<hr/>	
DESCRIPTION	<p>The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO.</p> <p>Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The "otherwise specified" exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, "AC Sources—Operating," Required Action C.2, requires declaring required feature(s) supported by an inoperable diesel generator, inoperable when the redundant required feature(s) are inoperable. The Completion Time states, "4 hours from discovery of Condition C concurrent with inoperability of redundant required feature(s)." In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.</p> <p>Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability.</p>

(continued)

1.3 Completion Times

DESCRIPTION
(continued)

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the discovery of the situation that required entry into the Condition, unless otherwise specified.

Once a Condition has been entered, subsequent divisions, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, unless otherwise specified.

However, when a subsequent division, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

- a. Must exist concurrent with the first inoperability; and
- b. Must remain inoperable or not within limits after the first inoperability is resolved.

The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:

- a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours; or
- b. The stated Completion Time as measured from discovery of the subsequent inoperability.

The above Completion Time extension does not apply to those Specifications that have exceptions that allow completely separate re-entry into the Condition (for each division, subsystem, component, or variable expressed in the Condition) and separate tracking of Completion Times based on this re-entry. These exceptions are stated in individual Specifications.

(continued)

1.3 Completion Times

DESCRIPTION
(continued)

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . ." Example 1.3-3 illustrates one use of this type of Completion Time. The 10 day Completion Time specified for Conditions A and B in Example 1.3-3 may not be extended.

(continued)

3.0 LCO APPLICABILITY

LCO 3.0.4
(continued)

- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or
- c. When an allowance is stated in the individual value, parameter, or other Specification.

This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.10, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

(continued)

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1 SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2 The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3 If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

(continued)



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

ENERGY OPERATIONS, INC.

WATERFORD STEAM ELECTRIC STATION, UNIT 3

AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

DOCKET NO. 50-382

Amendment No. 255
Renewed License No. NPF-38

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Entergy Operations, Inc. (EOI), dated January 31, 2019, as supplemented by letter dated May 23, 2019, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.2 of Renewed Facility Operating License No. NPF-38 is hereby amended to read as follows:

2. Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 255, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. EOI shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert J. Pascarelli, Chief
Plant Licensing Branch IV
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Renewed Facility Operating
License No. NPF-38 and
Technical Specifications

Date of Issuance: September 11, 2019

ATTACHMENT TO LICENSE AMENDMENT NO. 255
TO RENEWED FACILITY OPERATING LICENSE NO. NPF-38
WATERFORD STEAM ELECTRIC STATION, UNIT 3
DOCKET NO. 50-382

Replace the following pages of the Renewed Facility Operating License No. NPF-38 and Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Facility Operating License

REMOVE

-4-

INSERT

-4-

Technical Specifications

REMOVE

3/4 0-2

INSERT

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the NRC of any action by equity investors or successors in interest to Entergy Louisiana, LLC that may have an effect on the operation of the facility.

- C. This renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I and is subject to all applicable provisions of the Act and to the rules, regulations and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

1. Maximum Power Level

EOI is authorized to operate the facility at reactor core power levels not in excess of 3716 megawatts thermal (100% power) in accordance with the conditions specified herein.

2. Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 255, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the renewed license. EOI shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. Antitrust Conditions

- (a) Entergy Louisiana, LLC shall comply with the antitrust license conditions in Appendix C to this renewed license.
- (b) Entergy Louisiana, LLC is responsible and accountable for the actions of its agents to the extent said agent's actions contravene the antitrust license conditions in Appendix C to this renewed license.

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the Surveillance. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified interval shall be failure to meet the LCO except as provided in 4.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed twenty-five percent of the specified surveillance interval.

4.0.3 If It is discovered that a Surveillance was not performed within its specified interval, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified surveillance interval, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable ACTION(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable ACTION(s) must be entered.

4.0.4 Entry into an OPERATIONAL MODE or other specified condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the stated surveillance interval or as otherwise specified. This provision shall not prevent passage through or to operational modes as required to comply with ACTION requirements.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NOS. 265 AND 316 TO RENEWED FACILITY OPERATING
LICENSE NOS. DPR-51 AND NPF-6,
AMENDMENT NO. 221 TO RENEWED FACILITY OPERATING LICENSE NO. NPF-29,
AMENDMENT NOS. 291 AND 266 TO RENEWED FACILITY OPERATING LICENSE NOS.
DPR-26 AND DPR-64,
AMENDMENT NO. 270 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-20,
AMENDMENT NO. 199 TO RENEWED FACILITY OPERATING LICENSE NO. NPF-47
AMENDMENT NO. 255 TO RENEWED FACILITY OPERATING LICENSE NO. NPF-38
ENTERGY OPERATIONS, INC., AND ENTERGY NUCLEAR OPERATIONS, INC.
ARKANSAS NUCLEAR ONE, UNITS 1 AND 2
GRAND GULF NUCLEAR STATION, UNIT 1
INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3
PALISADES NUCLEAR PLANT
RIVER BEND STATION, UNIT 1
WATERFORD STEAM ELECTRIC STATION, UNIT 3
DOCKET NOS. 50-313, 50-368, 50-416, 50-247, 50-286, 50-255, 50-458, AND 50-382

1.0 INTRODUCTION

By application dated January 31, 2019 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML19032A256), as supplemented by letter dated May 23, 2019 (ADAMS Accession No. ML19143A232), Entergy Operations, Inc. and Entergy Nuclear Operations, Inc. (the licensees), requested changes to the technical specifications (TSs) for Arkansas Nuclear One, Units 1 and 2 (ANO-1 and ANO-2); Grand Gulf Nuclear Station, Unit 1 (Grand Gulf); Indian Point Nuclear Generating Station Unit Nos. 2 and 3 (Indian Point 2 and Indian Point 3); Palisades Nuclear Plant (Palisades); River Bend Station, Unit 1 (River Bend); and Waterford 3 Steam Electric Station, Unit 3 (Waterford 3) (together, the facilities). The amendments would revise and clarify TS usage rules for completion times, limiting conditions for operation (LCOs), and surveillance requirements (SRs) based on Technical Specifications Task Force (TSTF) Traveler TSTF-529, Revision 4 "Clarify Use and Application Rules," dated February 29, 2016 (ADAMS Accession No. ML16062A271). The amendments would also make minor editorial changes to improve the clarity of several of the TS pages affected by the proposed adoption of TSTF-529, Revision 4.

The supplemental letter dated May 23, 2019, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the U.S. Nuclear Regulatory Commission (NRC or the Commission) staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on April 9, 2019 (84 FR 14145).

2.0 REGULATORY EVALUATION

2.1 Background

Traveler TSTF-529, Revision 4, was approved by the NRC by letter dated April 21, 2016 (ADAMS Package Accession No. ML16060A441). TSTF-529, Revision 4, modifies the current Standard Technical Specifications (STSs).¹ The STSs provide guidance on the format and content of TSs for each of the light-water reactor (LWR) nuclear steam supply systems. TSTF-529, Revision 4, makes changes to Section 1.3, "Completion Times," and TS Section 3.0, "Limiting Conditions for Operation (LCO) Applicability" and "Surveillance Requirement (SR) Applicability," in each of the STSs.

LCOs specify minimum requirements for ensuring safe operation of the facility. When an LCO is not met, the licensee must shut down the reactor or follow any remedial actions permitted by the TSs until the LCO can be met. The TSs typically specify one or more conditions for each LCO, which describe the ways in which the LCO is not met. For each stated condition, the TSs specify one or more required actions and associated completion times (i.e., remedial actions). TSTF-529, Revision 4, changes STS Section 1.3 to revise and clarify how the completion times for required actions are implemented.

In each STS, LCO 3.0.1 through LCO 3.0.9 establish the general requirements applicable to all specifications and apply at all times, unless otherwise stated. The STS LCO 3.0.4 specifies the only three situations where it is permissible to enter a mode or other specified condition when an LCO is not met. TSTF-529, Revision 4, changes STS LCO 3.0.4 to clarify that these three situations are independent of each other.

Similarly, in each STS, SR 3.0.1 through SR 3.0.4 establish the general requirements for surveillances that are applicable to all specifications and apply at all times, unless otherwise stated. The STS SR 3.0.3 allows a licensee to delay declaring an LCO not met, for a specified time period, when it is discovered that a surveillance was not performed within its specified frequency. TSTF-529, Revision 4, changes STS SR 3.0.3 to permit its use when it is discovered that a surveillance was never performed, and to clarify that the delay period may only be used when there is a reasonable expectation that the SR will be met when the surveillance is performed.

¹ NUREG-1430, Revision 4.0, "Standard Technical Specifications: Babcock and Wilcox Plants," Volume 1, dated April 2012 (ADAMS Accession No. ML12100A177); NUREG-1431, Revision 4.0, "Standard Technical Specifications: Westinghouse Plants," Volume 1, dated April 2012 (ADAMS Accession No. ML12100A222); NUREG-1432, Revision 4.0, "Standard Technical Specifications: Combustion Engineering Plants," Volume 1, dated April 2012 (ADAMS Accession No. ML12102A165); NUREG-1433, Revision 4.0, "Standard Technical Specifications: General Electric [Boiling-Water Reactor] BWR/4 Plants," Volume 1, dated April 2012 (ADAMS Accession No. ML12104A192); and NUREG-1434, Revision 4.0, "Standard Technical Specifications: General Electric BWR/6 Plants," Volume 1, dated April 2012 (ADAMS Accession No. ML12104A195).

2.2 Description of TS Changes

The changes that TSTF-529, Revision 4, makes to STS Section 1.3, LCO 3.0.4, and SR 3.0.3 are independent of each other and licensees may choose to adopt them separately. For each facility, the licensee proposed to make changes to the TSs based on TSTF-529, Revision 4. The licensee's proposed TS changes are described below.

The licensee also proposed several editorial changes to improve the clarity of several of the TS pages affected by the adoption of TSTF-529, Revision 4. For example, the licensee proposed to incorporate the word "continued" in the header and footer on several of the affected TS pages for the facilities to indicate that the TS section continues. Also, the licensee proposed incorporating the title of one of the affected TS pages, which was inadvertently deleted.

The amendment for Indian Point 3 made minor editorial corrections on page 3 of the Renewed Facility Operating License as follows:

- "Renewed license" replaces "amended license" throughout the page to reflect the Renewed Facility Operating License issued on September 17, 2018 (ADAMS Accession No. ML18213A114);
- "Appendix C" is reintroduced to paragraph 2.C.(2) (the Renewed Facility Operating License issued on September 17, 2018 had omitted the reference to Appendix C);
- In paragraph 2.C.(2) of the license, "license" is lowercased; and
- The following text in paragraph 2.F was removed: "of May 2, 1975, to Consolidated Edison Company of New York, Inc."

In addition, TS Pages 1.3-3 through 1.3-12 for Indian Point 2 are included for repagination purposes. TS Page 1.3-4 for ANO-1 and TS Page 3.0-4a for Grand Gulf were not issued as no changes were made to those pages.

2.2.1 Proposed Changes to TS Section 1.3, "Completion Times"

The licensee proposed changes to Section 1.3 of the TSs for ANO-1, Grand Gulf, Indian Point 2, Indian Point 3, Palisades, and River Bend. Similar changes were not requested for ANO-2 or Waterford 3 because the TS Section 1.0, "Definitions," for ANO-2 and Waterford 3 does not currently include a definition for "Completion Time."

The licensee proposed to revise the first part of the Description in TS Section 1.3 for ANO-1, Indian Point 2, and Indian Point 3 to read as follows (added text shown in bold, and deleted text shown in bold strikeout):

The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the ~~time of~~ discovery of a situation (e.g., inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the unit is in a MODE or specified condition stated in the Applicability of the LCO.

Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The “otherwise specified” exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, “AC Sources - Operating,” Required Action B.2, requires declaring required feature(s) supported by an inoperable diesel generator, inoperable when the redundant required feature(s) are inoperable. The Completion Time states, “4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s).” In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.

Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability.

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the ~~time of~~ discovery of the situation that required entry into the Condition, **unless otherwise specified**.

Once a Condition has been entered, subsequent trains, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition, unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, **unless otherwise specified**.

With the licensee’s proposed changes, TS Section 1.3 for Grand Gulf, Palisades, and River Bend will read similar to the text above. Current TSs for these facilities have minor differences in terminology and punctuation, which are not affected by the proposed changes. Examples include:

- TS Section 1.3 for River Bend references LCO 3.8.1, Required Action C.2 instead of Required Action B.2 to maintain consistency with the current River Bend TSs.
- TS Section 1.3 for Grand Gulf and River Bend would use the terminology “divisions” instead of “trains” to maintain consistency with the current Grand Gulf and River Bend TSs.

- TS Section 1.3 for Palisades would refer to Palisades as “plant” instead of “unit” to maintain consistency with the current Palisades TS.

2.2.2 Proposed Changes to LCO 3.0.4

The licensee proposed to change LCO 3.0.4 of the TSs for ANO-1, ANO-2, Grand Gulf, Indian Point 2, Indian Point 3, Palisades, and River Bend. Similar changes were not requested for Waterford 3.

For Grand Gulf, Indian Point 2, Indian Point 3, and River Bend, LCO 3.0.4 currently states, in part:

When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:

- a. When the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time;
- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications, or
- c. When an allowance is stated in the individual value, parameter, or other Specification.

Currently, LCO 3.0.4 for ANO-1 and Palisades are similar to the text above, except:

- LCO 3.0.4.b ends with a semicolon before “or” instead of a comma before “or.”

Currently, LCO 3.0.4 for ANO-2 is also similar to the text above, except:

- “ACTIONs” is used instead of “ACTIONS” in LCO 3.0.4.a.

The licensee proposed to clarify LCO 3.0.4.b for each of the facilities specified above, by placing the statement regarding exceptions in parenthesis and removing the semicolon after the word “appropriate.” In addition, the licensee proposed replacing the ending comma with a semicolon. Thus, with the proposed changes, TS LCO 3.0.4.b for ANO-1, ANO-2, Grand Gulf, Indian Point 2, Indian Point 3, Palisades, and River Bend will state:

After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or

The purpose of these proposed changes is to clarify that LCO 3.0.4.a, LCO 3.0.4.b, and LCO 3.0.4.c are independent conditions, such that LCO 3.0.4 can be applied when any one of these conditions is met.

2.2.3 Proposed Changes to SR 3.0.3 or its Equivalent

The licensee proposed changes to SR 3.0.3 (or its equivalent) for each facility. Currently, SR 3.0.3 (or its equivalent) allows the licensee to delay declaring an LCO not met for a specified period of time when it is discovered that a surveillance was not performed within its specified frequency. Currently, the licensee cannot apply SR 3.0.3 (or its equivalent) to a surveillance that has never been performed. For each facility, the licensee requested approval to apply SR 3.0.3 (or its equivalent) to surveillances which have never been performed and proposed to revise SR 3.0.3 (or its equivalent) to clarify that the delay period is only applicable when there is a reasonable expectation that the SR will be met when the surveillance is performed.

The licensee proposed to revise the first part of SR 3.0.3 for ANO-1, Indian Point 2, Indian Point 3, and Palisades to read as follows (added text shown in bold):

If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. **The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed.** A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

With the proposed change, SR 3.0.3 for Grand Gulf and River Bend will read similar to the text above, except Grand Gulf and River Bend do not capitalize "surveillance" in the last sentence of the first part of SR 3.0.3.

For ANO-2, SR 4.0.3 currently contains similar requirements as above, but differs in terminology. With the proposed change, the first part of SR 4.0.3 for ANO-2 will read as follows (added text shown in bold):

If it is discovered that a Surveillance was not performed within its specified interval, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified interval, whichever is greater. This delay period is permitted to allow performance of the Surveillance. **The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed.** A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

For Waterford 3, SR 4.0.3 currently contains similar requirements as above, but differs in terminology. With the proposed change, the first part of SR 4.0.3 for Waterford 3 will read as follows (added text shown in bold):

If it is discovered that a Surveillance was not performed within its specified interval, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the

specified surveillance interval, whichever is greater. This delay period is permitted to allow performance of the Surveillance. **The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed.** A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

2.3 Regulatory Requirements and Guidance

Per Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(b), each license authorizing operation of a utilization facility will include TSs. The TSs will be derived from the analyses and evaluations included in the safety analysis report, and amendments thereto, submitted pursuant to 10 CFR 50.34 (describing the technical information to be included in applications for an operating license). Pursuant to 10 CFR 50.36(c), TSs are required to include items in the following five specific categories related to station operation: (1) safety limits, limiting safety system settings, and limiting control settings; (2) LCOs; (3) SRs; (4) design features; and (5) administrative controls. The Commission may include such additional TSs as the Commission finds appropriate.

Paragraph 50.36(c)(2) of 10 CFR establishes the requirements for LCOs and states, in part:

Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for the safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met.

Paragraph 50.36(c)(3) of 10 CFR establishes the requirements for SRs and states:

Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.

The NRC staff's guidance for review of the TSs is in NUREG-0800 "Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants: LWR Edition" Chapter 16, "Technical Specifications," Revision 3, dated March 2010 (ADAMS Accession No. ML100351425). As described therein, as part of the regulatory standardization effort, the staff has prepared improved STSs (NUREG-1430 through NUREG-1434) for each of the LWR nuclear steam supply systems and associated balance-of-plant equipment systems. The licensee's proposed amendments are based on TSTF-529, Revision 4, which is an NRC-approved change to the current STSs. The staff's review includes consideration of whether the proposed changes are consistent with the current STSs as modified by TSTF-529, Revision 4. Special attention is given to TS provisions that depart from the current STSs, as modified by NRC-approved TSTF travelers, to determine whether proposed differences are justified by uniqueness in plant design or other considerations so that 10 CFR 50.36 is met.

3.0 TECHNICAL EVALUATION

The NRC staff reviewed the licensee's application in accordance with the regulatory requirements and guidance discussed in Section 2.3 of this safety evaluation (SE). The staff's

evaluation of the proposed changes to TS Section 1.3, LCO 3.0.4, and SR 3.0.3 (or equivalent) are discussed separately below.

3.1 Changes to TS Section 1.3, "Completion Times"

The licensee proposed changes to Section 1.3 of the TSs for ANO-1, Grand Gulf, Indian Point 2, Indian Point 3, Palisades, and River Bend. Similar changes were not requested for ANO-2 or Waterford 3 because the ANO-2 and Waterford 3 TS Section 1.0, "Definitions," does not currently include a definition for "Completion Time."

3.1.1 Changes to "Time of Discovery"

In the STSs, the only mention of the term "time of discovery" in relation to completion times is in STS Section 1.3. Throughout the STSs, the term "discovery" is used to describe the point in time that it is recognized that the requirements of an LCO are not met. For example, STS LCO 3.0.2 states, in part: "Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6." In addition, the STS Bases for LCO 3.0.2 state, in part: "LCO 3.0.2 establishes that upon discovery of a failure to meet an LCO, the associated ACTIONS shall be met." TSTF-529, Revision 4, deletes "time of" from statements referring to "time of discovery" in STS Section 1.3.

As indicated in Section 2.2.1 of this SE, the licensee proposed changes to TS Section 1.3, for ANO-1, Grand Gulf, Indian Point 2, Indian Point 3, Palisades, and River Bend, which would delete "time of" from statements which refer to "time of discovery." These proposed changes are consistent with TSTF-529, Revision 4. The NRC staff determined that the proposed change makes TS Section 1.3 consistent with the use of the term "discovery" in relation to completion times throughout the rest of the TSs. These changes do not alter the requirements currently in the TSs, and they clarify the use of the term "discovery" as it applies to TS completion times. Therefore, the NRC staff finds the proposed changes acceptable.

3.1.2 Addition of Beginning of Completion Time Discussion

TSTF-529, Revision 4, adds the following text to the first paragraph of the Description in STS Section 1.3:

Unless otherwise specified, the Completion Time begins when a senior licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The "otherwise specified" exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, "AC Sources - Operating," Required Action B.2, requires declaring required feature(s) supported by an inoperable diesel generator, inoperable when the redundant required feature(s) are inoperable. The Completion Time states, "4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)." In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.

For ANO-1, Grand Gulf, Indian Point 2, Indian Point 3, Palisades, and River Bend, the licensee has proposed to add text to TS Section 1.3 that is either identical or substantially similar to the text above from TSTF-529, Revision 4. The differences between the licensee's proposed text and the text above are limited to plant-specific differences associated with the title of LCO 3.8.1, the required action number (i.e., C.2 versus B.2), and the completion time wording.

The operating shift crew is responsible for overall control of facility operation. As part of that responsibility, the operating shift crew must be aware of the status of the plant and condition of structures, systems and components, including any degraded or nonconforming conditions that may affect plant operation. Therefore, the proposed change simply augments the NRC staff's expectation that a senior licensed operator on the operating shift crew, with responsibility for plant operations, makes the determination that an LCO is not met and enters the appropriate Condition. The phrase "and an ACTIONS Condition is entered" in the proposed text is necessary to accommodate circumstances in which LCO 3.0.6 allows an LCO to not be met without entry into a Condition. In those circumstances, a Completion Time does not begin. In addition, the example included in the proposed text helps explain the concept presented.

The NRC staff finds the proposed addition of text to the first paragraph of TS Section 1.3 acceptable because it clarifies senior reactor operators' responsibilities, as they relate to Required Actions and associated Completion Times, and it is consistent with the allowances of LCO 3.0.6.

3.1.3 Addition of "Unless Otherwise Specified"

The phrase "unless otherwise specified" in STS Section 1.3, refers to those instances in which TS LCOs define the start of the Completion Time different from "discovery." For example, in the current STS, LCO 3.8.1, Required Action B.2, calls for declaring required feature(s) supported by an inoperable diesel generator inoperable when the redundant required feature(s) are inoperable. The Completion Time states: "4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)." In this case, the Completion Time does not begin until the conditions in the Completion Time are satisfied.

As indicated in Section 3.1.2 of this SE, TSTF-529, Revision 4, includes the phrase "unless otherwise specified" in the additional text added to the first paragraph of STS Section 1.3. The added text further discusses the "otherwise specified" exceptions. TSTF-529, Revision 4, also adds the phrase "unless otherwise specified" to the following two sentences in STS Section 1.3 (emphasis added):

When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the discovery of the situation that required entry into the Condition, **unless otherwise specified.**

The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, **unless otherwise specified.**

As indicated in Section 2.2.1 of this SE, the licensee proposed to add the phrase "unless otherwise specified" to Section 1.3 of the TSs for ANO-1, Grand Gulf, Indian Point 2, Indian Point 3, Palisades, and River Bend. These changes are consistent with TSTF-529, Revision 4.

The addition of the phrase “unless otherwise specified” acknowledges that there are instances, as indicated in the individual TSs, when the Completion Time does not start at discovery of a situation. These exceptions are varied, such as when a Required Action Note or SR Note provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While using the Note, should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point.

The NRC staff finds the proposed change acceptable because it clarifies that there are exceptions regarding entry into TS Required Actions and the start of the associated Completion Times.

3.1.4 Technical Conclusion Regarding Changes to TS Section 1.3

As discussed above, the amendments for ANO-1, Grand Gulf, Indian Point 2, Indian Point 3, Palisades, and River Bend would revise and clarify the TS usage rules for completion times associated with required actions for conditions where an LCO is not met. The NRC staff concludes that the licensee will continue to meet 10 CFR 50.36(c)(2) with the proposed changes because the TSs for each of these facilities will continue to specify appropriate remedial actions for the licensee to follow until the LCO can be met.

3.2 Changes to LCO 3.0.4

The STS LCO 3.0.4 specifies the only three situations (LCO 3.0.4.a, b, and c) where it is permissible to enter a mode or other specified condition when an LCO is not met. In the STS, LCO 3.0.4.a ends with a semicolon and LCO 3.0.4.b ends with a comma followed by “or.” The STS LCO 3.0.4.b states:

After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate; exceptions to this Specification are stated in the individual Specifications, or

Operators could misapply this statement by believing the “or” applies to the clause regarding exceptions and that LCO 3.0.4.a, b, and c apply concurrently. TSTF-529, Revision 4, clarified this statement in the STS by placing the clause regarding exceptions in parenthesis, deleting the semicolon after “appropriate,” and replacing the ending comma with a semicolon. The revised STS LCO 3.0.4.b states:

After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or

The licensee proposed to revise TS LCO 3.0.4.b for ANO-2, Grand Gulf, Indian Point 2, Indian Point 3, and River Bend, so that LCO 3.0.4.b for these plants will read the same as above for TSTF-529, Revision 4. The licensee also proposed to make the same changes to TS LCO 3.0.4.b for ANO-1 and Palisades; although it already has a final semicolon instead of a comma.

The NRC staff finds the proposed changes to TS LCO 3.0.4.b acceptable because it reduces the potential for misapplication of LCO 3.0.4 and it does not change the current TS requirements for any of the licensee's facilities. Therefore, with the proposed changes to LCO 3.0.4, the requirements in 10 CFR 50.36(c)(2) will continue to be met at ANO-1, ANO-2, Grand Gulf, Indian Point 2, Indian Point 3, Palisades, and River Bend.

3.3 Changes to SR 3.0.3 or its Equivalent

TSTF-529, Revision 4, revises the interpretation of STS SR 3.0.3 to allow it to be applied to SRs which have never been performed, and revises STS SR 3.0.3 to read as follows (added text shown in bold):

If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. **The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed.** A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

For each facility (ANO-1, ANO-2, Grand Gulf, Indian Point 2, Indian Point 3, Palisades, River Bend, and Waterford 3), the licensee requested approval to apply SR 3.0.3 (or its equivalent) to SRs which have never been performed, and proposed changes to SR 3.0.3 (or its equivalent) consistent with TSTF-529, Revision 4. Current TSs for these facilities have minor differences in terminology and punctuation, which are not affected by the proposed changes. These minor differences are discussed in Section 2.2.3 of this SE.

Currently, SR 3.0.3 (or its equivalent) allows the licensee to delay declaring an LCO not met, for a specified period of time, when it is discovered that a surveillance was not performed within its specified frequency. The licensee is not currently permitted to apply SR 3.0.3 (or its equivalent) to a surveillance that has never been performed. This is because the allowance provided by SR 3.0.3 (or its equivalent) is currently based on the fact that the SR was satisfactorily met in the past and it will most likely be met when the surveillance is performed.

The NRC staff recognizes that there are instances in which a surveillance may not have been performed in the past, but there is still a reasonable expectation the SR will be met when the surveillance is performed. For example, a licensee discovers that a relay contact has never been tested as required by an SR. The licensee can determine that there is a reasonable expectation the SR will be met when the test is performed if the subject relay contact has been tested by another SR, or historical operation of the subject relay contact has been successful.

For each facility, the licensee stated in the revised TS Bases pages included with the application that many factors should be considered when determining if there is a reasonable expectation that the SR will be met when the surveillance is performed. The factors identified include, but are not limited to, the period of time since the surveillance was last performed, whether the surveillance (or a portion thereof) has ever been performed, and any other indications, tests, or activities that might support the expectation that the SR will be met when the surveillance is performed. The licensee further states:

It is not sufficient to infer the behavior of the associated equipment from the performance of similar equipment. The rigor of determining whether there is a reasonable expectation a Surveillance will be met when performed should increase based on the length of time since the last performance of the Surveillance. If the Surveillance has been performed recently, a review of the Surveillance history and equipment performance may be sufficient to support a reasonable expectation that the Surveillance will be met when performed. For Surveillances that have not been performed for a long period or that have never been performed, a rigorous evaluation based on objective evidence should provide a high degree of confidence that the equipment is OPERABLE. The evaluation should be documented in sufficient detail to allow a knowledgeable individual to understand the basis for the determination.

The NRC staff finds that the delay period allowed by SR 3.0.3 (or its equivalent) offers adequate time to complete surveillances that have been missed, including those that have never been performed. In addition, the proposed change augments plant safety since it could prevent unnecessary shutdowns by providing adequate time to complete SRs that have never been performed but are likely to be met when the surveillance is performed. The staff finds that the proposed change for ANO-1, ANO-2, Grand Gulf, Indian Point 2, Indian Point 3, Palisades, River Bend, and Waterford 3, which expands the scope of SR 3.0.3 (or its equivalent) to surveillances that have never been performed, is acceptable because the licensee must determine that there is a reasonable expectation the SR will be met when the surveillance is performed. Therefore, with the proposed change to SR 3.0.3 (or its equivalent), the staff concludes that 10 CFR 50.36(c)(2) and 10 CFR 50.36(c)(3) will continue to be met at each of the licensee's facilities.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Arkansas, Louisiana, Michigan, and Mississippi State officials were notified on July 12, 2019, and the New York State official was notified on July 15, 2019, of the proposed issuance of the amendments. The State officials had no comments.

5.0 ENVIRONMENTAL CONSIDERATION

The amendments change requirements with respect to the installation or use of facility components located within the restricted areas as defined in 10 CFR Part 20 and changes SRs. The NRC staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, published in the *Federal Register* on April 9, 2019 (83 FR 14145), and there has been no public comment on such finding. Accordingly, the

amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

6.0 CONCLUSION

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

Principal Contributor: Margaret O'Banion, NRR

Date: September 11, 2019

SUBJECT: ARKANSAS NUCLEAR ONE, UNITS 1 AND 2; GRAND GULF NUCLEAR STATION, UNIT 1; INDIAN POINT NUCLEAR GENERATING UNIT NOS. 2 AND 3; PALISADES NUCLEAR PLANT; RIVER BEND STATION, UNIT 1; WATERFORD STEAM ELECTRIC STATION, UNIT 3 – RE: ISSUANCE OF AMENDMENTS TO ADOPT TSTF-529, "CLARIFY USE AND APPLICATION RULES" (EPID L-2019-LLA-0013) DATED SEPTEMBER 11, 2019

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