ATTACHMENT A

1. Remove the following pages from our previous submittal:

   3/4 4-5, 3/4 4-6, 3/4 4-31, 3/4 4-18,
   3/4 11-1, 6-11, 6-13, 6-23

2. Insert the following pages in our previous submittal:

   3/4 4-6, 3/4 4-18, 3/4 11-1, 6-11,
   6-13, 6-23

## SAFETY VALVES - OPERATING

### LIMITING CONDITION FOR OPERATION

3.4.3 All pressurizer code safety valves shall be OPERABLE with a lift setting of 2485 PSIG ±1%.

APPLICABILITY: Modes 1, 2, and 3

ACTION:

a. With one pressurizer code safety valve inoperable, either restore the inoperable valve to OPERABLE status within 15 minutes or be in HOT SHUTDOWN within 12 hours.

### SURVEILLANCE REQUIREMENTS

4.4.3 Each pressurizer code safety valve shall be demonstrated OPERABLE with a lift setting of 2485 PSIG ±1%, in accordance with Specification 4.0.5.

## SPECIFIC ACTIVITY

### LIMITING CONDITION FOR OPERATION

3.4.8 The specific activity of the primary coolant shall be limited to:

a. $\leq$1.0 μCi/gram DOSE EQUIVALENT I-131, and

b. $\leq 100/\overline{E}$ μCi/gram.

APPLICABILITY: MODES 1, 2, 3, 4 and 5.

ACTION

MODES 1, 2 and 3*

a. With the specific activity of the primary coolant > 1.0 μCi/gram DOSE EQUIVALENT I-131 but within the allowable limit (below and to the left of the line) shown on Figure 3.4-1, operation may continue for up to 48 hours provided that operation under these circumstances shall not exceed 10 percent of the unit's total yearly operating time. The provisions of Specification 3.0.4 are not applicable.

b. With the specific activity of the primary coolant >1.0 μCi/gram DOSE EQUIVALENT I-131 for more than 48 hours during one continuous time interval or exceeding the limit line shown on Figure 3.4-1, be in HOT STANDBY with $T_{avg}$ <500°F within 6 hours.

c. With the specific activity of the primary coolant > $100/\overline{E}$ μCi/gram, be in HOT STANDBY with $T_{avg}$ < 500°F within 6 hours.

MODES 1, 2, 3, 4 and 5

a. With the specific activity of the primary coolant >1.0 μCi/gram DOSE EQUIVALENT I-131 or > $100/\overline{E}$ μCi/gram, perform the sampling and analysis requirements of item 4a of Table 4.4-12 until the specific activity of the primary coolant is restored to within its limits. Submit a Special Report to the Commission within 30 days pursuant to Specification 6.9.2 containing the results of the specific activity analyses together with the following information.

*With $T_{avg} \geq$ 500°F

## 3/4.11 RADIOACTIVE EFFLUENTS

### 3/4.11.1 LIQUID EFFLUENTS

#### CONCENTRATION

#### LIMITING CONDITION FOR OPERATION

3.11.1.1 The concentration of radioactive material released at anytime from the site (See Figure 5.1-2) shall be limited to the concentrations specified in 10 CFR Part 20, Appendix B, Table II, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to $2 \times 10^{-4}$ µCi/ml total activity.

APPLICABILITY: At all times.

ACTION:

a. With the concentration of radioactive material released from the site to unrestricted areas exceeding the above limits; immediately restore concentration within the above limits, and

b. Submit a Special Report to the Commission within 30 days in accordance with Specification 6.9.2.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

#### SURVEILLANCE REQUIREMENTS

4.11.1.1.1 Radioactive liquid wastes shall be sampled and analyzed according to the sampling and analysis program of Table 4.11-1*.

4.11.1.1.2 The results of radioactive analysis shall be used in accordance with the methods of the ODCM to assure that the concentration at the point of release are maintained within the limits of specifications 3.11.1.1.

* Radioactive liquid discharges are normally via batch modes. Turbine Building Drains shall be monitored as specified in Section 4.11.1.1.3.

AUDITS (Continued)

6.5.2.9 The ORC shall report to and advise the Vice President, Nuclear on those areas of responsibility specified in Section 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of ORC activities shall be prepared, approved and distributed as indicated by the following:

a. Minutes of each ORC meeting shall be prepared for and approved by the ORC Chairman within 14 days following each meeting.

b. Reports of reviews encompassed by Section 6.5.2.7 above, shall be prepared, approved, and forwarded to the ORC Chairman within 14 days following completion of the review.

c. Audit reports encompassed by Section 6.5.2.8 above, shall be forwarded to the Vice President, Nuclear and to the management positions responsible for the areas audited within 30 days after completion of the audit.

d. The Vice President, Nuclear shall review all recommendations of the ORC.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified in accordance with 10 CFR 50.72 and/or a report be submitted pursuant to the requirements of Section 50.73 to 10CFR Part 50, and

b. Each REPORTABLE EVENT shall be reviewed by the OSC, and the results of this review shall be submitted to the ORC.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

b. The change is approved by two (2) members of the plant management staff, at least one (1) of whom holds a Senior Reactor Operator's License on the unit affected.

c. The change is documented, reviewed by the OSC and approved by the Plant Superintendent within 14 days of implementation.

## 6.9 REPORTING REQUIREMENTS

### ROUTINE REPORTS

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Director of the Regional Office of Inspection and Enforcement unless otherwise noted.

### STARTUP REPORTS

6.9.1.1 A summary report of plant startup and power escalation testing will be submitted following (1) receipt of an operating license, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the plant.

6.9.1.2 The startup report shall address each of the tests identified in the FSAR and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any aditional specific details requested in license conditions based on other commitments shall be included in this report.

6.9.1.3 Startup reports shall be submitted within (1) 90 days following completion of the startup test program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of startup test program, and resumption or commencement of commercial power operation), supplementary reports shall be submitted at least every three months until all three events have been completed.

a. ECCS Actuation, Specifications 3.5.2 and 3.5.3.

b. Inoperable Seismic Monitoring Instrumentation, Specification 3.3.3.3.

c. Inoperable Meteorological Monitoring Instrumentation, Specification 3.3.3.4.

d. Seismic event analysis, Specification 4.3.3.3.2.

e. Sealed source leakage in excess of limits, Specification 4.7.9.1.3.

f. Fire Detection Instrumentation, Specification 3.3.3.6.

g. Fire Suppression Systems, Specifications 3.7.14.1, 3.7.14.2 and 3.7.14.3 and 3.7.14.5.

h. Miscellaneous reporting requirements specified in the Action Statements for Radiological Effluent Technical Specifications.

i. RCS specific activity, Specification 3.4.8.

j. Containment inspection report, Specification 4.6.1.6.2.

## 6.10 RECORD RETENTION

6.10.1 The following records shall be retained for at least five (5) years:

a. Records and logs of facility operation covering time interval at each power level.

b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety.

c. All REPORTABLE EVENTS.

d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.

e. Records of reactor tests and experiments.

f. Records of changes made to Operating Procedures.

g. Records of radioactive shipments.

h. Records of sealed source leak tests and results.

i. Records of annual physical inventory of all sealed source material of record.

ATTACHMENT B

## Safety Evaluation

Proposed Change Request No. 90 Revision 1 amends our previous submittal to reflect NRC staff recommendations resulting from the review of our original submittal.

## Description and Purpose of Change

| | | |
|---|---|---|
| 1. | pages 3/4 4-5<br>3/4 4-6<br>3/4 4-31 | The NRC recommends that no reporting requirement changes be made to these pages, therefore, these changes should be removed from our original submittal. Page 3/4 4-6 has been revised to include an additional administrative change to surveillance requirement 4.4.3 by replacing the reference to ASME Section XI with reference to specification 4.0.5. |
| 2. | pages 3/4 4-18<br>3/4 11-1 | The NRC recommends deleting a sentence added to the Action Statement by our original submittal Immediately notify the Commission pursuant to 10 CFR 50.72 (declaration of any of the Emergency Classes specified in the Emergency Preparedness Plan)". This is a reportable event and will be covered under Specification 6.6.1. |
| 3. | page 6-11 | The NRC recommends revising Specification 6.6.1.a by adding "in accordance with 10CFR50.72" and recommends revising Specification 6.6.1.b by deleting "Vice President, Nuclear" since he is an ORC member. |
| 4. | page 6-13 | The NRC recommends revising the title of Specification 6.9 by deleting "AND REPORTABLE OCCURRENCES". |
| 5. | page 6-23 | The NRC recommends revising Specification 6.9.2 by deleting items i and j to reflect the change to (1.) above and items k and l were renumbered to i and j. |

## Basis for Proposed No Significant Hazards Consideration Determination

The proposed revisions provide clarification of our previous submittal in response to NRC staff recommendations.

The Commission has provided guidance concerning the application of these standards by providing certain examples (48 FR 14870). One of these, Example (Vii), involving no significant hazards consideration is "A change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations". This revision matches this example, therefore, it is proposed that the change be characterized as involving no significant hazards consideration.

## Basis

1. Is the probability of an occurrence or the consequence of an accident or malfunction of equipment important to safety as previously evaluated in the UFSAR increased? No.

   Reason These changes are administrative in nature since they reflect changes in the regulations, are not a safety concern and will not increase the probability of an occurrence or the consequence of an accident previously evaluated in the UFSAR.

2. Is the possibility for an accident or malfunction of a different type than previously evaluated in the UFSAR created? No

   Reason The proposed changes are administrative in nature and do not physically change plant safety-related systems, components or structures, therefore, the changes will not create the possibility for a new type of accident or malfunction of a different type than any previously evaluated in the UFSAR.

3. Is the margin of safety as defined in the basis for any Technical Specification reduced? No.

   Reason The changes in the reporting requirements are administrative in nature. None of the systems or components will be physically changed or their function altered in any way. Therefore, the margin of safety inherent in the applicable bases will not be reduced.

4. Based on the above, is an unreviewed safety question involved? No.

## Conclusion

The changes are administrative in nature and do not involve physical changes to any plant safety-related systems, components or structures, will not increase the likelihood of a malfunction of safety-related equipment, increase the consequences of an accident previously analyzed, nor create the possibility of a malfunction different than previously evaluated in the UFSAR. The changes are being made to reflect NRC staff recommendations resulting from the review of our original submittal. The changes are not a safety concern and do not affect the UFSAR.

Based on the considerations above, the proposed administrative changes have been determined to be safe and do not involve an unreviewed safety question.