Attachment A

Revised Technical Specification Pages

Pages: 1-1 (no changes)

3/4.4-2 (no changes)

3/4.5-7

3/4.7-11

3/4.7-12

3/4.7-13

3/4.7-14

3/4.7-15

3/4.7-16

B3/4.7-10

B3/4.7-12

3/4.9-4 (no changes)

1.0 DEFINITIONS

The succeeding frequently used terms are explicitly defined so that a uniform interpretation of the specifications may be achieved.

A. Safety Limit

The safety limits are limits below which the reasonable maintenance of the cladding and primary systems are assured. Exceeding such a limit is cause for unit shutdown and review by the Nuclear Regulatory Commission before resumption of unit operation. Operation beyond such a limit may not in itself result in serious consequences but it indicates an operational deficiency subject to regulatory review.

B. Limiting Safety System Setting (LSSS)

The limiting safety system settings are settings on instrumentation which initiate the automatic protective action at a level such that the safety limits will not be exceeded. The region between the safety limit and these settings represent margin with normal operation lying below these settings. The margin has been established so that with proper operation of the instrumentation the safety limits will never be exceeded.

C. Limiting Conditions for Operation (LCO)

The limiting conditions for operation specify the minimum acceptable levels of system performance necessary to assure safe startup and operation of the facility. When these conditions are met, the plant can be operated safely and abnormal situations can be safely controlled.

D. Core Operating Limits Report

The CORE OPERATING LIMITS REPORT is a reload-cycle specific document, its supplements and revisions, that provides core operating limits for the current operating reload cycle. These cycle specific core operating limits shall be determined for each reload cycle in accordance with Specification 6.9.A.4. Plant operation within these operating limits is addressed in individual specifications.

E. Operable - Operability

A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal or emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component or device to perform its function(s) are also capable of performing their related support function(s).

F. Operating

Operating means that a system or component is performing its intended functions in its required manner.

LIMITING CONDITIONS FOR OPERATION

3.4 STANDBY LIQUID CONTROL SYSTEM (Cont)

B. Operation with Inoperable Components:

1. From and after the date that a redundant component is made or found to be inoperable, Specification 3.4.A.1 shall be considered fulfilled and continued operation permitted provided that the diesel generator associated with the operable subsystem is operable and, the component is returned to an operable condition within seven days.

SURVEILLANCE REQUIREMENTS

4.4 STANDBY LIQUID CONTROL SYSTEM (Cont)

A. Normal System Availability (Cont)

b. At least once during each refueling interval, while testing as specified in 3.13, manually initiate one of the Standby Liquid Control System loops and pump demineralized water into the reactor vessel.

This test checks explosion of the charge associated with the tested loop, proper operation of the valves, and pump operability. The replacement charges to be installed will be selected from the same manufactured batch as the tested charge.

c. When testing to satisfy requirement 4.4.A.2.b, both systems, including both explosive valves, shall be tested in the course of two refueling intervals.

B. Surveillance with Inoperable Components:

1. When a component is found to be inoperable, its redundant component shall be demonstrated to be operable immediately and daily thereafter until the inoperable component is repaired.

LIMITING CONDITION FOR OPERATION	SURVEILLANCE REQUIREMENT
3.5 CORE AND CONTAINMENT COOLING SYSTEMS (Cont)	4.5 CORE AND CONTAINMENT COOLING SYSTEMS (Cont)
F. Minimum Low Pressure Cooling and Diesel Generator Availability	F. Minimum Low Pressure Cooling and Diesel Generator Availability
1. During any period when one diesel generator is inoperable, continued reactor operation is permissible only during the succeeding 72 hours unless such diesel generator is sooner made operable, provided that all of the low pressure core and containment cooling systems and the remaining diesel generator shall be operable. If this requirement cannot be met, an orderly shutdown shall be initiated and the reactor shall be placed in the Cold Shutdown Condition within 24 hours.	1. When it is determined that one diesel generator is inoperable, within 24 hours, determine that the operable diesel generator is not inoperable due to a common cause failure, or perform surveillance 4.9.A.1.a for the operable diesel generator, and within 1 hour and once every 8 hours thereafter, verify correct breaker alignment and indicated power availability for each offsite circuit.
2. Any combination of inoperable components in the core and containment cooling systems shall not defeat the capability of the remaining operable components to fulfill the cooling functions.	
3. When irradiated fuel is in the reactor vessel and the reactor is in the Cold Shutdown condition, both core spray systems, the LPCI and containment cooling systems may be inoperable, provided no work is being done which has the potential for draining the reactor vessel.	
4. During a refueling outage, for a period of 30 days, refueling operation may continue provided that one core spray system or the LPCI system is operable or Specification 3.5.F.5 is met.	

LIMITING CONDITIONS FOR OPERATION

3.7 CONTAINMENT SYSTEMS (Cont.)

A. Primary Containment (Cont.)

With no H2 analyzer operable, reactor operation is allowed for up to 48 hours. If one of the inoperable analyzers is not made fully operable within 48 hours, the reactor shall be in a least Hot Shutdown within the next 12 hours.

B. Standby Gas Treatment System and Control Room High Efficiency Air Filtration System

1. Standby Gas Treatment System

a. Except as specified in 3.7.B.1.c or 3.7.B.1.e below, both trains of the standby gas treatment system shall be operable when in the Run, Startup, and Hot Shutdown MODES, during movement of irradiated fuel assemblies in the secondary containment, and during movement of new fuel over the spent fuel pool, and during CORE ALTERATIONS, and during operations with a potential for draining the reactor vessel (OPDRVs),

or

the reactor shall be in cold shutdown within the next 36 hours.

b. 1. The results of the in-place cold DOP tests on HEPA filters shall show ≥99% DOP removal. The results of halogenated hydrocarbon tests on charcoal adsorber banks shall show ≥99% halogenated hydrocarbon removal.

SURVEILLANCE REQUIREMENTS

4.7 CONTAINMENT SYSTEMS (Cont.)

B. Standby Gas Treatment System and Control Room High Efficiency Air Filtration System

1. Standby Gas Treatment System

a. 1. At least once per operating cycle, it shall be demonstrated that pressure drop across the combined high efficiency filters and charcoal adsorber banks is less than 8 inches of water at 4000 cfm.

2. At least once per operating cycle, demonstrate that the inlet heaters on each train are operable and are capable of an output of at least 14 kW.

3. The tests and analysis of Specification 3.7.B.1.b. shall be performed at least once per operating cycle or following painting, fire or chemical release in any ventilation zone communicating with the system while the system is operating that could contaminate the HEPA filters or charcoal adsorbers.

4. At least once per operating cycle, automatic initiation of

LIMITING CONDITIONS FOR OPERATION

3.7 CONTAINMENT SYSTEMS (Cont.)

B. Standby Gas Treatment System and Control Room High Efficiency Air Filtration System (Cont.)

2. The results of the laboratory carbon sample analysis shall show ≥95% methyl iodide removal at a velocity within 10% of system design, 0.5 to 1.5 mg/m3 inlet methyl iodide concentration, ≥70% R.H. and ≥190°F. The analysis results are to be verified as acceptable within 31 days after sample removal, or declare that train inoperable and take the actions specified in 3.7.B.1.c.

c. From and after the date that one train of the Standby Gas Treatment System is made or found to be inoperable for any reason, continued reactor operation, irradiated fuel handling, or new fuel handling over the spent fuel pool is permissible only during the succeeding seven days providing that within 2 hours all active components of the other standby gas treatment train are verified to be operable and the diesel generator associated with the operable train is operable.

If the system is not made fully operable within 7 days, reactor shutdown shall be initiated and the reactor shall be in cold shutdown within the next 36 hours and fuel handling operations shall be terminated within 2 hours.

Fuel handling operations in progress may be completed.

SURVEILLANCE REQUIREMENTS

4.7 CONTAINMENT SYSTEMS (Cont.)

B. Standby Gas Treatment System and Control Room High Efficiency Air Filtration System (Cont.)

each branch of the standby gas treatment system shall be demonstrated, with Specification 3.7.B.1.d satisfied.

5. Each train of the standby gas treatment system shall be operated for at least 15 minutes per month.

6. The tests and analysis of Specification 3.7.B.1.b.2 shall be performed after every 720 hours of system operation.

b. 1. In-place cold DOP testing shall be performed on the HEPA filters after each completed or partial replacement of the HEPA filter bank and after any structural maintenance on the HEPA filter system housing which could affect the HEPA filter bank bypass leakage.

2. Halogenated hydrocarbon testing shall be performed on the charcoal adsorber bank after each partial or complete replacement of the charcoal adsorber bank or after any structural maintenance on the charcoal adsorber housing which could affect the charcoal adsorber bank bypass leakage.

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.7 CONTAINMENT SYSTEMS (Cont.)	4.7 CONTAINMENT SYSTEMS (Cont.)
B. Standby Gas Treatment System and Control Room High Efficiency Air Filtration System (Cont.)	B. Standby Gas Treatment System and Control Room High Efficiency Air Filtration System (Cont.)
d. Fans shall operate within ± 10% of 4000 cfm.	
e. From and after the date that one train of the Standby Gas Treatment System is made or found to be inoperable for any reason during Refuel Outages, refueling operations are permissible only during the succeeding 7 days providing that within 2 hours all active components of the other train are verified to be operable and the diesel generator associated with the operable train is operable. If the system is not made fully operable within 7 days, i) place the operable train in operation immediately or ii) suspend movement of irradiated fuel assemblies in secondary containment or new fuel handling over the spent fuel pool or core. Any fuel assembly movement in progress may be completed.	

LIMITING CONDITIONS FOR OPERATION

3.7 CONTAINMENT SYSTEMS (Cont.)

B. Standby Gas Treatment System and Control Room High Efficiency Air Filtration System (Cont.)

2. Control Room High Efficiency Air Filtration System

a. Except as specified in Specification 3.7.B.2.c or 3.7.B.2.e below, both trains of the Control Room High Efficiency Air Filtration System used for the processing of inlet air to the control room under accident conditions shall be operable when in the Run, Startup, and Hot Shutdown MODES, during movement of irradiated fuel assemblies in the secondary containment, and during movement of new fuel over the spent fuel pool, and during CORE ALTERATIONS, and during operations with a potential for draining the reactor vessel (OPDRVs),

or

the reactor shall be in cold shutdown within the next 36 hours.

b. 1. The results of the in-place cold DOP tests on HEPA filters shall show ≥99% DOP removal. The results of the halogenated hydrocarbon tests on charcoal adsorber banks shall show ≥99% halogenated hydrocarbon removal when test results are extrapolated to the initiation of the test.

2. The results of the laboratory carbon sample analysis shall show ≥95% methyl iodide removal at a velocity within 10% of system design, 0.05 to 0.15 mg/m3 inlet methyl iodide concentration, ≥70% R.H., and ≥125°F. The analysis results are to be verified as acceptable within 31 days after sample removal, or declare that train inoperable and take the actions specified in 3.7.B.2.c.

SURVEILLANCE REQUIREMENTS

4.7 CONTAINMENT SYSTEMS (Cont.)

B. Standby Gas Treatment System and Control Room High Efficiency Air Filtration System (Cont.)

2. Control Room High Efficiency Air Filtration System

a. At least once per operating cycle the pressure drop across each combined filter train shall be demonstrated to be less than 6 inches of water at 1000 cfm or the calculated equivalent.

b. 1. The tests and analysis of Specification 3.7.B.2.b shall be performed once per operating cycle or following painting, fire or chemical release in any ventilation zone communicating with the system while the system is operating.

2. In-place cold DOP testing shall be performed after each complete or partial replacement of the HEPA filter bank or after any structural maintenance on the system housing which could affect the HEPA filter bank bypass leakage.

3. Halogenated hydrocarbon testing shall be performed after each complete or partial replacement of the charcoal adsorber bank or after any structural maintenance on the system housing which could affect the charcoal adsorber bank bypass leakage.

4. Each train shall be operated with the heaters in automatic for at least 15 minutes every month.

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.7 CONTAINMENT SYSTEMS (Cont.)	4.7 CONTAINMENT SYSTEMS (Cont.)
B. Standby Gas Treatment System and Control Room High Efficiency Air Filtration System (Cont.)	B. Standby Gas Treatment System and Control Room High Efficiency Air Filtration System (Cont.)
	5. The test and analysis of Specification 3.7.B.2.b.2 shall be performed after every 720 hours of system operation.
c. From and after the date that one train of the Control Room High Efficiency Air Filtration System is made or found to be inoperable for any reason, reactor operation, irradiated fuel handling, or new fuel handling over the spent fuel pool is permissible only during the succeeding 7 days providing that within 2 hours all active components of the other CRHEAF train are verified to be operable and the diesel generator associated with the operable train is operable. If the system is not made fully operable within 7 days, reactor shutdown shall be initiated and the reactor shall be in cold shutdown within the next 36 hours and fuel handling operations shall be terminated within 2 hours. Fuel handling operations in progress may be completed.	c. At least once per operating cycle demonstrate that the inlet heaters on each train are operable and capable of an output of at least 14 kw.
d. Fans shall operate within ± 10% of 1000 cfm.	d. Perform an instrument functional test on the humidistats controlling the heaters once per operating cycle.
e. From and after the date that one train of the Control Room High Efficiency Air Filtration System is made or found to be inoperable for any reason during Refuel Outages, refueling operations are permissible only during the succeeding 7 days providing that within 2 hours all active components of the other train are verified to be operable and the diesel generator associated with the operable train is operable. If the system is not made fully operable within 7 days,	

LIMITING CONDITIONS FOR OPERATION	SURVEILLANCE REQUIREMENTS
3.7 CONTAINMENT SYSTEMS (Cont.)	4.7 CONTAINMENT SYSTEMS (Cont.)
i) perform surveillance 4.7.B.2.b.4 for the operable CRHEAF every 24 hours or ii) suspend movement of irradiated fuel assemblies in secondary containment or new fuel handling over the spent fuel pool or core. Any fuel assembly movement in progress may be completed.	
C. Secondary Containment	C. Secondary Containment
1. Secondary containment shall be OPERABLE when in the Run, Startup and Hot Shutdown MODES, during movement of irradiated fuel assemblies in the secondary containment, and during movement of new fuel over the spent fuel pool, and during CORE ALTERATIONS, and during operations with a potential for draining the reactor vessel (OPDRVs).	1. Each refueling outage prior to refueling, secondary containment capability shall be demonstrated to maintain 1/4 inch of water vacuum under calm wind (5 mph) conditions with a filter train flow rate of not more than 4000 cfm.
2. a. With Secondary Containment inoperable when in the Run, Startup and Hot Shutdown MODES, restore Secondary Containment to OPERABLE status within 4 hours.	
b. Required Action and Completion Time of 2.a not met, be in Hot Shutdown in 12 hours AND Cold Shutdown within 36 hours.	
c. With Secondary Containment inoperable during movement of irradiated fuel assemblies in the secondary containment, and during movement of new fuel over the spent fuel pool, and during CORE ALTERATIONS, and during OPDRVs, immediately 1. Suspend movement of irradiated fuel assemblies in the secondary containment. AND 2. Suspend movement of new fuel over the spent fuel pool. AND 3. Suspend CORE ALTERATIONS. AND 4. Initiate action to suspend OPDRVs.	

BASES:

3/4.7 CONTAINMENT SYSTEMS (Cont.)

Tests of impregnated charcoal identical to that used in the filters indicate that a shelf life of five years leads to only minor decreases in methyl iodide removal efficiency. Hence, the frequency of laboratory carbon sample analysis is adequate to demonstrate acceptability. Since adsorbers must be removed to perform this analysis this frequency also minimizes the system out of service time as a result of surveillance testing. In addition, although the halogenated hydrocarbon testing is basically a leak test, the adsorbers have charcoal of known efficiency and holding capacity for elemental iodine and/or methyl iodide, the testing also gives an indication of the relative efficiency of the installed system. The 31 day requirement for the ascertaining of test results ensures that the ability of the charcoal to perform its designed function is demonstrated and known in a timely manner.

The required Standby Gas Treatment System flow rate is that flow, less than or equal to 4000 CFM which is needed to maintain the Reactor Building at a 0.25 inch of water negative pressure under calm wind conditions. This capability is adequately demonstrated during Secondary Containment Leak Rate Testing performed pursuant to Technical Specification 4.7.C.1.c.

The test frequencies are adequate to detect equipment deterioration prior to significant defects, but the tests are not frequent enough to load the filters or adsorbers, thus reducing their reserve capacity too quickly. The filter testing is performed pursuant to appropriate procedures reviewed and approved by the Operations Review Committee pursuant to Section 6 of these Technical Specifications. The in-place testing of charcoal filters is performed by injecting a halogenated hydrocarbon into the system upstream of the charcoal adsorbers. Measurements of the concentration upstream and downstream are made. The ratio of the inlet and outlet concentrations gives an overall indication of the leak tightness of the system. A similar procedure substituting dioctyl phthalate for halogenated hydrocarbon is used to test the HEPA filters.

Pressure drop tests across filter and adsorber banks are performed to detect plugging or leak paths though the filter or adsorber media. Considering the relatively short times the fans will be run for test purposes, plugging is unlikely and the test interval of once per operating cycle is reasonable.

System drains and housing gasket doors are designed such that any leakage would be inleakage from the Standby Gas Treatment System Room. This ensures that there will be no bypass of process air around the filters or adsorbers.

Only one of the two Standby Gas Treatment Systems (SBGTS) is needed to maintain the secondary containment at a 0.25 inch of water negative pressure upon containment isolation. If one system is made or found to be inoperable, there is no immediate threat to the containment system performance and reactor operation or refueling activities may continue while repairs are being made. In the event one SBGTS is inoperable, the redundant system's active components will be verified to be operable within 2 hours. This substantiates the availability of the operable system and justifies continued reactor or refueling operations.

During refueling outages, if the inoperable train is not restored to operable status within the required completion time, the operable train should immediately be placed in operation. This action ensures that the remaining train is operable, that no failures that could prevent automatic actuation have occurred, and that any other failure would be readily detected. An alternative is to suspend fuel movement, thus, placing the plant in a condition that minimizes risk.

The test frequencies are adequate to detect equipment deterioration prior to significant defects, but the tests are not frequent enough to load the filters or adsorbers, thus reducing their reserve capacity too quickly. The filter testing is performed pursuant to appropriate procedures reviewed and approved by the Operations Review Committee pursuant to Section 6 of these Technical Specifications. The in-place testing of charcoal filters is performed by injecting a halogenated hydrocarbon into the system upstream of the charcoal adsorbers. Measurements of the concentration upstream and downstream are made. The ratio of the inlet and outlet concentrations gives an overall indication of the leak tightness of the system. A similar procedure substituting dioctyl phthalate for halogenated hydrocarbon is used to test the HEPA filters.

Air flow through the filters and charcoal adsorbers for 15 minutes each month assures operability of the system. Since the system heaters are automatically controlled, the air flowing through the filters and adsorbers will be ≤70% relative humidity and will have the desired drying effect.

If one train of the system is made or found to be inoperable, there is no immediate threat to the control room, and reactor operation or fuel handling may continue for a limited period of time while repairs are being made. In the event one CRHEAF train is inoperable, the redundant system's active components will be verified to be operable within 2 hours. During refueling outages, if the inoperable train is not restored to operable status within the required completion time, refueling operations may continue provided the operable CRHEAF train is placed in the pressurization mode daily. This action ensures that the remaining train is operable, that no failures that would prevent actuation will occur, and that any active failure will be readily detected. An alternative is to suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. If both trains of the CRHEAF system are inoperable, the reactor will be brought to a condition where the Control Room High Efficiency Air Filtration System is not required.

LIMITING CONDITION FOR OPERATION

3.9 AUXILIARY ELECTRICAL SYSTEM (Cont)

B. Operation with Inoperable Equipment

Whenever the reactor is in Run Mode or Startup Mode with the reactor not in a Cold Condition, the availability of electric power shall be as specified in 3.9.B.1, 3.9.B.2, 3.9.B.3, 3.9.B.4, and 3.9.B.5.

1. From and after the date that incoming power is not available from the startup or shutdown transformer, continued reactor operation is permissible under this condition for seven days. During this period, both diesel generators and associated emergency buses must remain operable.

2. From and after the date that incoming power is not available from both startup and shutdown transformers, continued operation is permissible, provided both diesel generators and associated emergency buses remain operable, all core and containment cooling systems are operable, reactor power level is reduced to 25% of design and the NRC is notified within one (1) hour as required by 10CFR50.72.

3. From and after the date that one of the diesel generators or associated emergency bus is made or found to be inoperable for any reason, continued reactor operation is permissible in accordance with Specifications 3.4.B.1, 3.5.F.1, 3.7.B.1.c, 3.7.B.1.e, 3.7.B.2.c, and 3.7.B.2.e if Specification 3.9.A.1 and 3.9.A.2.a are satisfied.

4. From and after the date that one of the diesel generators or associated emergency buses and either the shutdown or startup transformer power source are

SURVEILLANCE REQUIREMENTS

4.9 AUXILIARY ELECTRICAL SYSTEM (Cont)

A. Auxiliary Electrical Equipment Surveillance (Cont)

3. Emergency 4160V Buses A5-A6 Degraded Voltage Annunciation System.

   a. Once each operating cycle, calibrate the alarm sensor.

   b. Once each 31 days perform a channel functional test on the alarm system.

   c. In the event the alarm system is determined inoperable under 3.b above, commence logging safety related bus voltage every 30 minutes until such time as the alarm is restored to operable status.

4. RPS Electrical Protection Assemblies

   a. Each pair of redundant RPS EPAs shall be determined to be operable at least once per 6 months by performance of an instrument functional test.

   b. Once per 18 months each pair of redundant RPS EPAs shall be determined to be operable by performance of an instrument calibration and by verifying tripping of the circuit breakers upon the simulated conditions for automatic actuation of the protective relays within the following limits:

Overvoltage	$\leq$ 132 volts
Undervoltage	$\geq$ 108 volts
Underfrequency	$\geq$ 57Hz

Description of Revisions to the April 25, 1996, Technical Specification Pages

Page 1-1

No change.

Page 3/4.4-2

No change

Page 3/4.5-7

The changes associated with the emergency diesel generator Allowable Outage Time (AOT) proposed for LCO 3.5.F.1 are removed from the page.

Surveillance 4.5.F.1 is reformatted to make the or and the and statements of the surveillance easier to differentiate. Also, the surveillance to verify correct breaker alignment and indicated power availability for each offsite circuit once every 8 hours is supplemented to require the surveillance be conducted within 1 hour as well.

These revisions are administrative in nature and do not affect the conclusions previously submitted regarding our determination of no significant hazards consideration.

Pages 3/4.7-11 and 3/4.7-14

Sections 3.7.B.1.a and 3.7.B.2.a are revised to reflect the recently issued Amendment 166 changes that define when Secondary Containment is required to be operable. The words "at all times when secondary containment integrity is required" are substituted with "when in the Run, Startup, and Hot Shutdown MODES, during movement of irradiated fuel assemblies in the secondary containment, and during movement of new fuel over the spent fuel pool, and during CORE ALTERATIONS, and during operations with a potential for draining the reactor vessel (OPDRVs)". Also, for clarity, the action specified in Sections 3.7.B.1.c and 3.7.B.2.c to be in cold shutdown within the next 36 hours if both trains of the SGT or CRHEAF systems are not operable, is added to Sections 3.7.B.1.a and 3.7.B.2.a.

These revisions are administrative in nature and do not affect the conclusions previously submitted regarding our determination of no significant hazards consideration.

Pages 3/4.7-12, 3/4.7-13, 3/4.7-15, and Bases Pages B3/4.7-10 and B3/4.7-12

Sections 3.7.B.1.c, 3.7.B.1.e, 3.7.B.2.c, and 3.7.B.2.e (and associated bases pages) are revised. The word "demonstrated" is changed to "verified" for confirming operability of the redundant system in the LCOs for the SGT and CRHEAF systems. The rationale for the change is based on the same principles and philosophy established by the NRC guidance provided in Generic Letter 93-05, "Line-Item Technical Specification Improvements to Reduce Surveillance Requirements for Testing During Power Operation." That is, the inoperability of a subsystem is not automatically indicative of a similar condition in the redundant subsystem unless a generic failure is suspected and that the periodic frequencies specified to demonstrate operability have been shown to be adequate to ensure equipment operability.

Also, a sentence in bases page B3/4.7-10 and a sentence in B3/4.7-12 are revised to be more consistent with the associated LCOs. The words "made or" are added to the sentences: "If one system is found to be inoperable...". The sentences will now read: "If one system is made or found...".

These revisions are administrative in nature and do not affect the conclusions previously submitted regarding our determination of no significant hazards consideration.

Page 3/4.7-16

Sections 3.7.C and 4.7.C are revised in content and format to incorporate the secondary containment specifications as revised by Amendment 166.

These revisions are administrative in nature and do not affect the conclusions previously submitted regarding our determination of no significant hazards consideration.

Page 3/4.9-4

The proposed LCOs for Section 3.9.B.1 associated with the startup and shutdown transformers are returned to their current wording. These changes apply to the emergency diesel generator allowable out-of-service time portion of the April 25, 1996, submittal. Also, the word "remain" is added to 3.9.B.1 and 3.9.B.2 to supplement the deleted wording "demonstrated to be" for determining operability of the EDG and associated emergency buses.

These revisions are administrative in nature and do not affect the conclusions previously submitted regarding our determination of no significant hazards consideration.

Information on the CRHEAF System Design and Operation

As part of the April 25, 1996, submittal, we proposed to restructure the LCO to provide conditions governing plant operation and conditions governing plant shutdown. The proposed changes governing plant shutdown were revised to allow fuel movement for up to 7 days provided that one train of CRHEAF (and SGT) is operable with its emergency power source also operable. After 7 days, the operable CRHEAF would then be demonstrated operable on a daily basis by running the train for 15 minutes each day.

For the purpose of describing the 15 minute/day proposed LCO action statement in more detail, an overview description of the Main Control Room Environmental Control System (MCRECS) is provided.

The MCRECS system is comprised of 1) a normal-operation, non-safety portion that can run in either once through or recirculation modes, and 2) a safety portion (CRHEAF) that supplies filtered outside air makeup.

During normal (non-safety) operation, the air is recirculated at approximately 13,000 cfm and conditioned through heating and cooling units. Two 1,000 cfm, safety-related, high efficiency filter trains (CRHEAF) are provided in parallel with the normal outside air inlet duct. Each CRHEAF train is powered from separate diesel generators in the event of loss of preferred ac power supply. In the event of an accident, the control room operator can manually initiate high efficiency filtration of the outside air supplied to the control room. Initiation of the CRHEAF fans closes a damper in the normal outside air intake duct and opens the CRHEAF inlet system isolation dampers. Because the normal, non-safety portion is not single failure proof, it is manually removed from operation when CRHEAF is actuated. CRHEAF flow is sufficient to maintain the control room at a positive pressure.

Running the operable CRHEAF train continuously as an LCO action would potentially create an uncomfortable control room environment due to the lower air flow rates and loss of the air conditioning associated with the normal portion. Running the operable train for 15 minutes each day is, therefore, preferable and will ensure the remaining train's operability. The CRHEAF is a highly reliable system, as evidenced by its historical surveillance and maintenance performance and its classification as a Category (a)(2)* system in our Maintenance Rule performance monitoring program. Also, since the system is manual initiation, running the operable train for 15 minutes each day will detect any active failures. An alternative to the daily testing is to immediately suspend activities that present a potential for releasing radioactivity that might require isolation of the control room. This places the plant in a condition that minimizes risk.

(* Per 10 CFR 50.65 (a)(2) : Monitoring as specified in paragraph (a)(1) of this section is not required where it has been demonstrated that the performance or condition of a structure, system, or component is being effectively controlled through the performance of appropriate preventive maintenance, such that the structure, system, or component remains capable of performing its intended function.)