



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

ARKANSAS POWER AND LIGHT COMPANY

DOCKET NO. 50-313

ARKANSAS NUCLEAR ONE, UNIT 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 109
License No. DPR-51

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Arkansas Power and Light Company (the licensee) dated December 4, 1987 as supplemented by letter dated April 14, 1988, 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.

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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 Facility Operating License No. DPP-51 is hereby amended to read as follows:

2. Technical Specifications

- The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 109, are hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Jose A. Calvo

Jose A. Calvo, Director
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical
Specifications

Date of Issuance: June 24, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 109

FACILITY OPERATING LICENSE NO. DPR-51

DOCKET NO. 50-313

Revise the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

REMOVE PAGES

117
117a
119
120
121
122
127

INSERT PAGES

117
117a
119
120
121
122
127

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

- 6.1.1 The Executive Director, ANO Site Operations shall be responsible for overall facility operation and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

OFFSITE

- 6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2.-1.

FACILITY STAFF

- 6.2.2 The Facility organization shall be as shown on Figure 6.2.-2. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.-1.

- 6.2.2.1 Administrative controls shall be established to limit the amount of overtime worked by plant staff performing safety related functions. These administrative controls shall be in accordance with the guidance provided by the NRC Policy Statement on working hours (Generic Letter No. 82-12).

6.3. FACILITY STAFF QUALIFICATIONS

- 6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable position, except for (1) the Health Physics Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975 and (2) the Shift Technical Advisor who shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Executive Director, ANO Site Operations and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.
- 6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Executive Director, ANO Site Operations and shall meet or exceed the requirements of Section 27 of the NFPA Code-1975 except for Fire Brigade training sessions which shall be held at least quarterly.

6.5 REVIEW AND AUDIT

6.5.1 Plant Safety Committee (PSC) Function

6.5.1.1 The Plant Safety Committee shall function to advise the Executive Director, ANO Site Operations on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Safety Committee shall be composed of the:

Chairman: General Manager, Plant Support
Member: Operations Manager
Member: Maintenance Manager
Member: Training Manager
Member: Plant Licensing Supervisor
Member: Engineering Manager
Member: Quality Assurance Superintendent
Member: Reactor Engineering Superintendent
Member: Health Physics Superintendent

The Executive Director, ANO Site Operations should designate in writing the Alternate Chairman in the absence of the Chairman.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PSC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PSC activities at any one time.

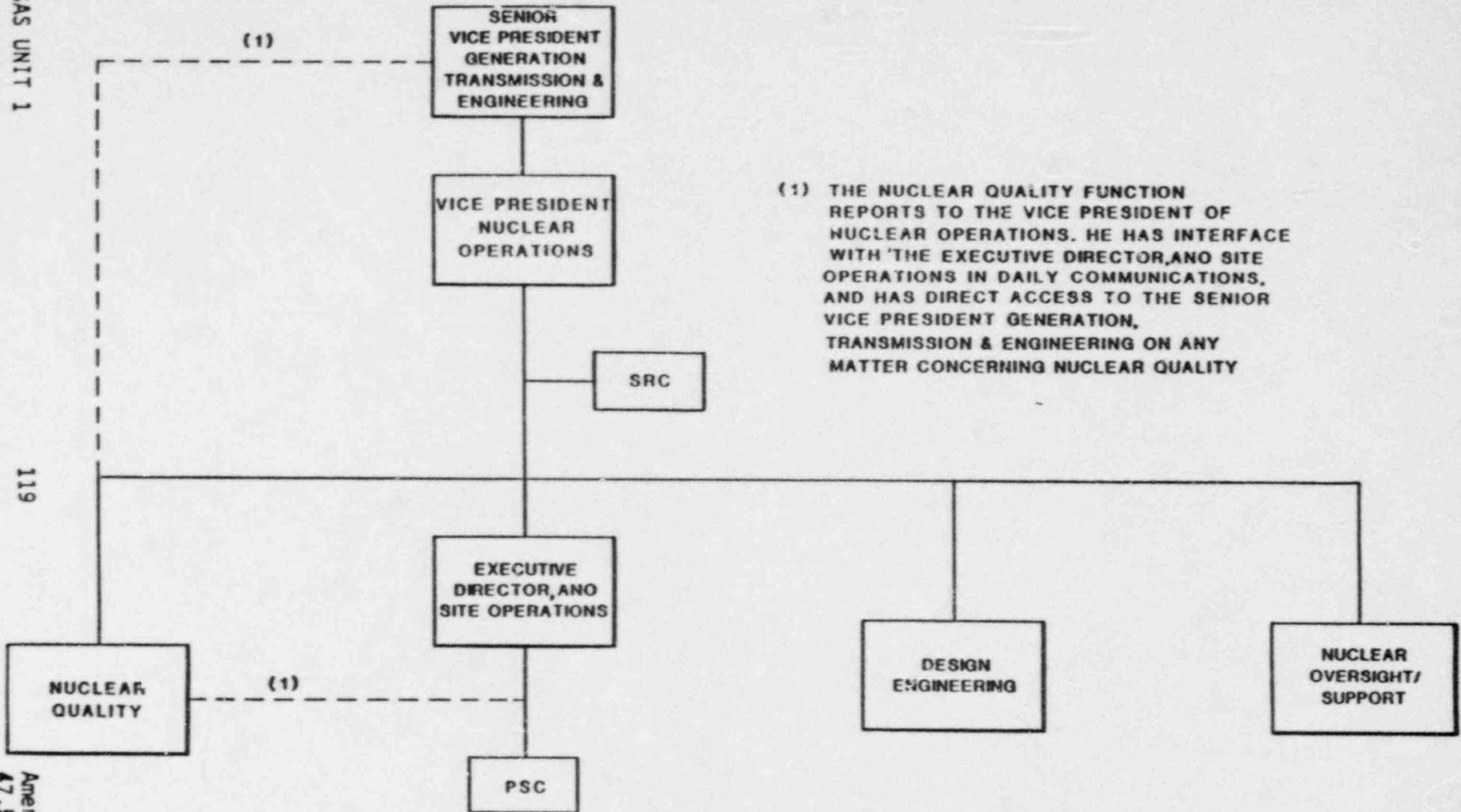
MEETING FREQUENCY

6.5.1.4 The PSC shall meet at least once per calendar month and as convened by the PSC Chairman or his designated alternate.

QUORUM

6.5.1.5 The minimum quorum of the PSC necessary for the performance of the PSC responsibility and authority provisions of these technical specifications shall consist of the Chairman or his designated alternate and four members including alternates.

ARKANSAS POWER & LIGHT COMPANY



119

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Amendment No. 15, 30, 34, 37
47, 58, 64, 82, 99, 109

FIGURE 6 2-1 MANAGEMENT ORGANIZATION CHART

ARKANSAS POWER & LIGHT COMPANY ARKANSAS NUCLEAR ONE

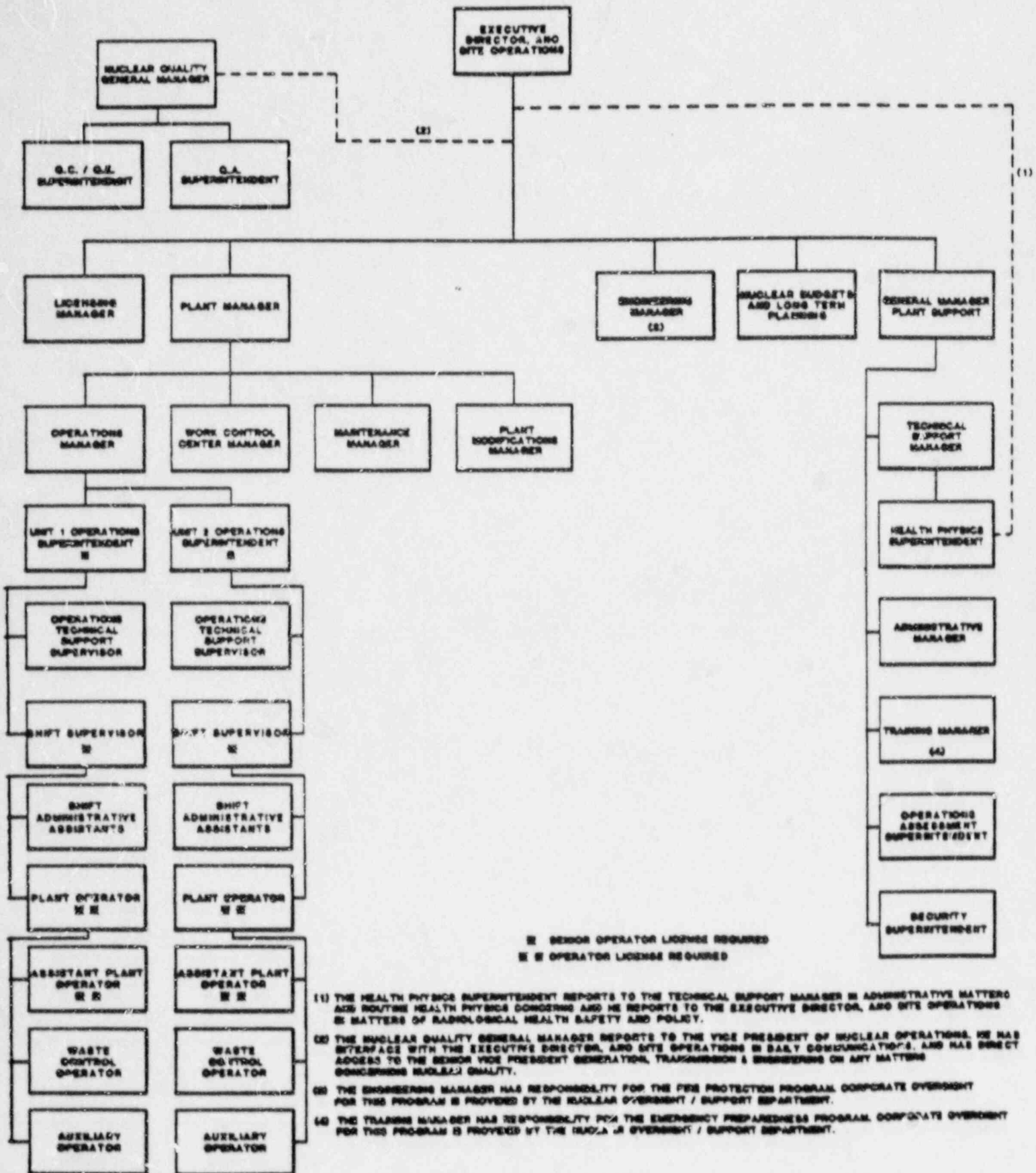


FIGURE 6.2-2 FUNCTIONAL ORGANIZATION FOR PLANT OPERATIONS

RESPONSIBILITIES

6.5.1.6 The Plant Safety Committee shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and revisions thereto, 2) any other proposed procedures or revisions thereto as determined by the Executive Director, ANO Site Operations to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to the Appendix "A" Technical Specifications.
- d. Review of all proposed changes or modifications to plant systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Executive Director, ANO Site Operations and to the Chairman of the Safety Review Committee.
- f. Review of those Reportable Occurrences requiring 24-hour notification of the Commission.

- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Executive Director, ANO Site Operations or the Safety Review Committee.
- i. Review of the Plant Security Plan and implementing procedures and submittal of recommended changes to the Executive Director, ANO Site Operations and the Safety Review Committee.
- j. Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the Executive Director, ANO Site Operations and the Safety Review Committee.
- k. Review of changes to the Offsite Dose Calculation Manual and the Process Control Program.

AUTHORITY

6.5.1.7.1. The Plant Safety Committee shall:

- a. Recommend in writing their approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Vice-President, Nuclear Operations and the Safety Review Committee of disagreement between the PSC and the Executive Director, ANO Site Operations; however, the Executive Director, ANO Site Operations shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The Plant Safety Committee shall maintain written minutes of each PSC meeting that, at a minimum, document the results of all PSC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Executive Director, ANO Site Operations and Chairman of the Safety Review Committee.

6.5.2 Safety Review Committee (SRC)

FUNCTION

- 6.5.2.1 The Safety Review Committee shall function to provide independent review and audit of designated activities in the areas of:
- a. nuclear power plant operations
 - b. nuclear engineering
 - c. chemistry and radiochemistry

- 6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed by the PSC and approved by the Executive Director, ANO Site Operations; Plant Manager or responsible General Manager prior to implementation and reviewed periodically as set forth in administrative procedures.
- 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 members of the plant staff, at least one of whom holds a Senior Reactor Operator's license on the unit affected.
 - c. The change is documented, and approved by the Executive Director, ANO Site Operations; Plant Manager or responsible General manager within 14 days of implementation.



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

ARKANSAS POWER AND LIGHT COMPANY

DOCKET NO. 50-368

ARKANSAS NUCLEAR ONE, UNIT 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 85
License No. NPF-6

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Arkansas Power and Light Company (the licensee) dated December 4, 1987 as supplemented by letter dated April 14, 1988, 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 charges to the Technical Specifications as indicated in the attachment to this license amendment, and Paragraph 2.C.(2) of Facility Operating License No. NPF-6 is hereby amended to read as follows:

2. Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 85, are hereby incorporated into the license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. The license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Jose A. Calvo

Jose A. Calvo, Director
Project Directorate - IV
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Attachment:
Charges to the Technical
Specifications

Date of Issuance: June 24, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 85

FACILITY OPERATING LICENSE NO. NPF-6

DOCKET NO. 50-368

Revise the following pages of the Appendix "A" Technical Specifications with the attached pages. The revised pages are identified by Amendment number and contain vertical lines indicating the area of change.

REMOVE PAGES

6-1
6-2
6-3
6-5
6-6
6-7
6-13
6-14

INSERT PAGES

6-1
6-2
6-3
6-5
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6-7
6-13
6-14

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Executive Director, ANO Site Operations shall be responsible for overall facility operations and shall delegate in writing the succession to this responsibility during his absence.

6.2 ORGANIZATION

OFFSITE

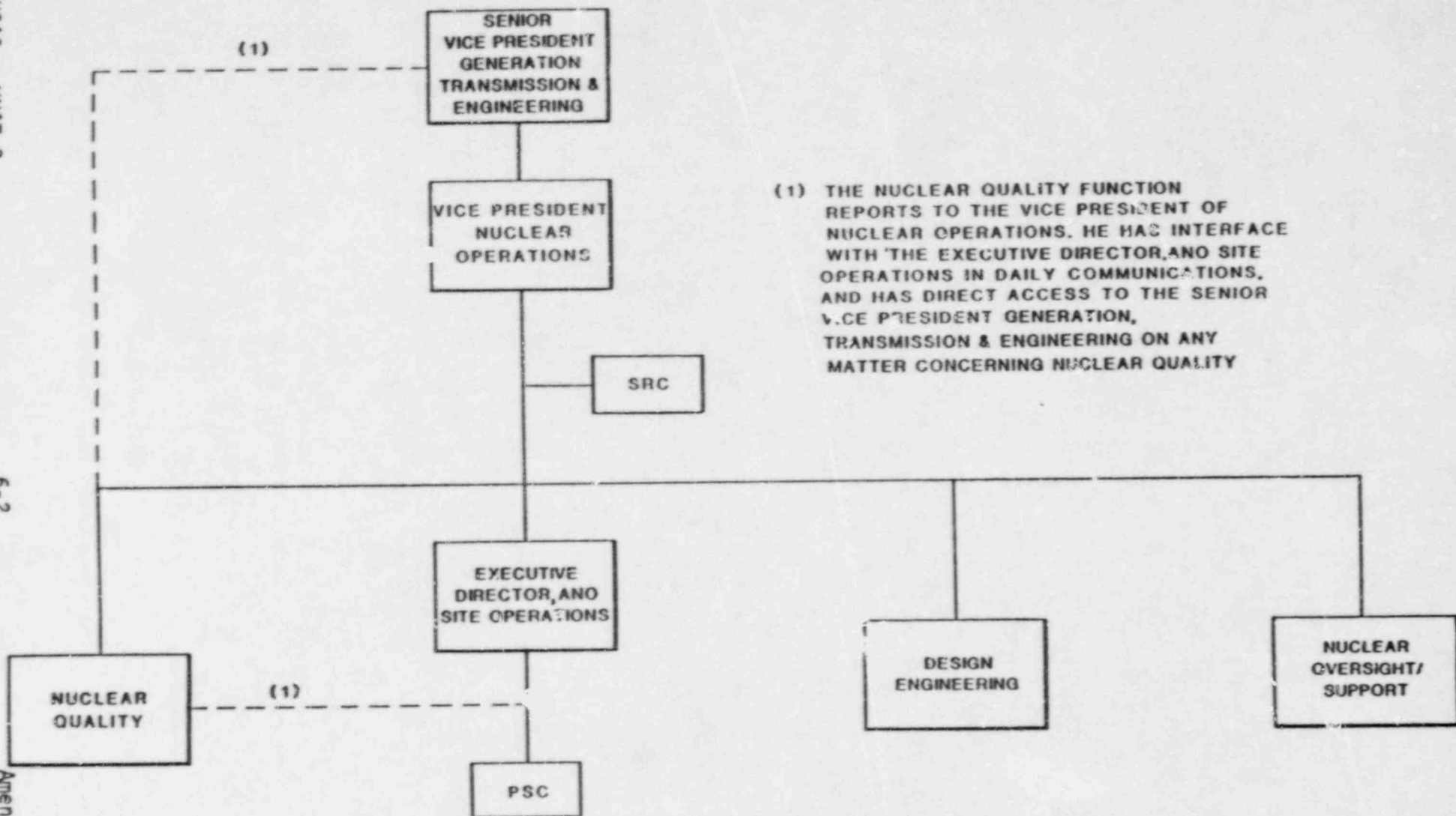
6.2.1 The offsite organization for facility management and technical support shall be as shown on Figure 6.2-1.

FACILITY STAFF

6.2.2 The Facility organization shall be as shown on Figure 6.2-2 and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. At least two licensed Operators shall be present in the control room during reactor start-up, scheduled reactor shutdown and during recovery from reactor trips.
- d. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- e. All CORE ALTERATIONS shall be directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- f. A site Fire Brigade of at least 5 members shall be maintained onsite at all times. The Fire Brigade shall not include 3 members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.
- g. Administrative control shall be established to limit the amount of overtime worked by plant staff performing safety related functions. These administrative controls shall be in accordance with the guidance provided by the NRC Policy Statement on working hours (Generic Letter No. 82-12).

ARKANSAS POWER & LIGHT COMPANY



6-2

Amendment No. 17, 25, 29,
52, 73, 85

FIGURE 6.2-1 MANAGEMENT ORGANIZATION CHART

ARKANSAS POWER & LIGHT COMPANY ARKANSAS NUCLEAR ONE

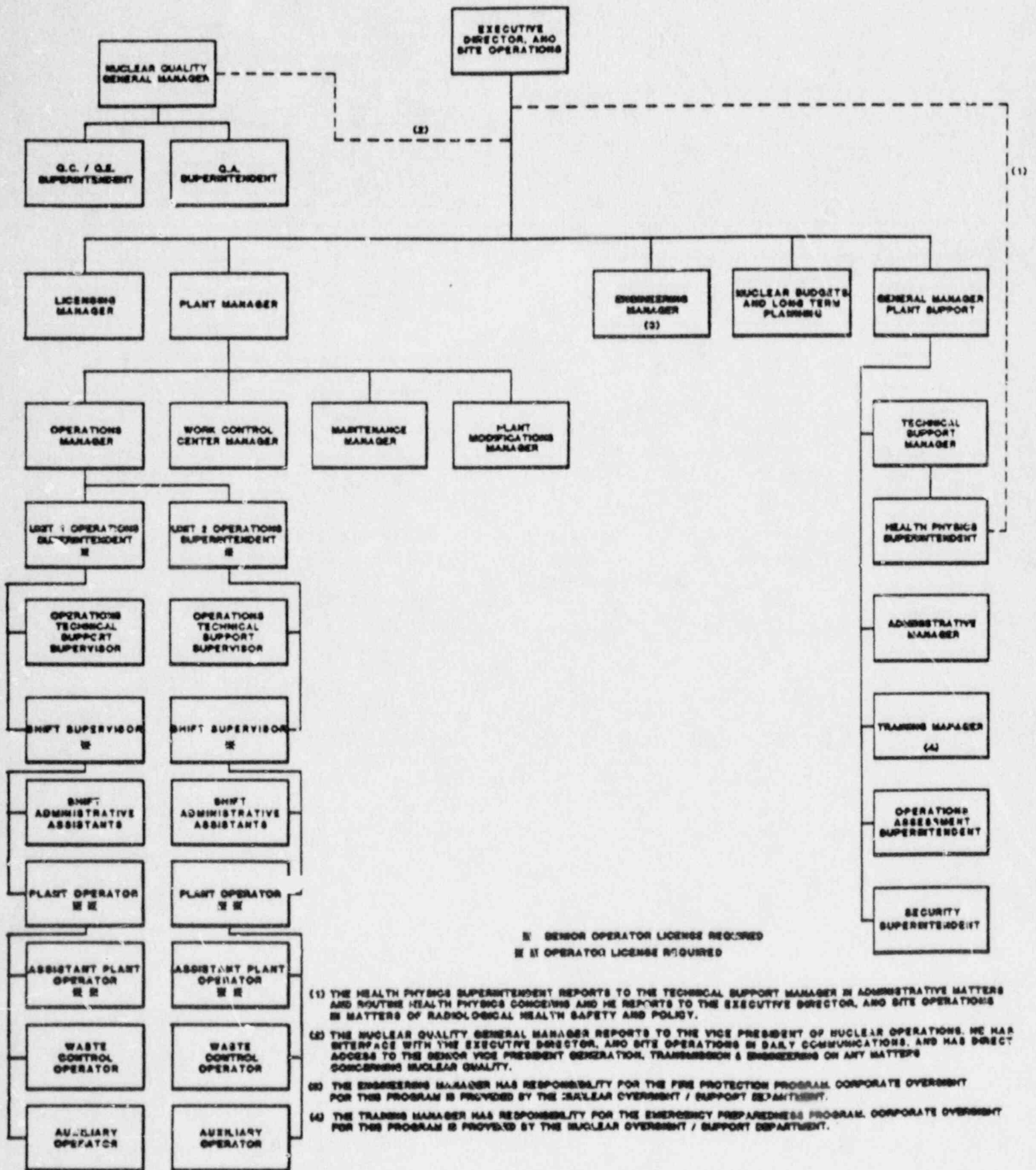


FIGURE 6.2-2 FUNCTIONAL ORGANIZATION FOR PLANT OPERATIONS

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION#

LICENSE CATEGORY	APPLICABLE MODES	
	1, 2, 3 & 4	5 & 6
SOL	1	1*
OL	2	1
Non-Licensed	2	1
Shift Technical Advisor	1	None Required

*Does not include the licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling, supervising CORE ALTERATIONS.

#Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1.

ADMINISTRATIVE CONTROLS

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions, except for (1) the Health Physics Superintendent who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, and (2) the Shift Technical Advisor who shall have a bachelors degree or equivalent in a scientific or engineering discipline with specific training in plant design, and response and analysis of the plant for transients and accidents.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the Executive Director, ANO Site Operations and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Executive Director, ANO Site Operations and shall meet or exceed the requirements of Section 27 of the NFPA Code - 1975, except for Fire Brigade training sessions which shall be held at least quarterly.

6.5 REVIEW AND AUDIT

6.5.1 PLANT SAFETY COMMITTEE (PSC)

FUNCTION

6.5.1.1 The Plant Safety Committee shall function to advise the Executive Director, ANO Site Operations on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The Plant Safety Committee shall be composed of the:

Chairman:	General Manager, Plant Support
Member:	Operations Manager
Member:	Maintenance Manager
Member:	Training Manager
Member:	Plant Licensing Supervisor
Member:	Engineering Manager
Member:	Quality Assurance Superintendent
Member:	Reactor Engineering Superintendent
Member:	Health Physics Superintendent
Member:	Nuclear Software Expert*

The Executive Director, ANO Site Operations shall designate in writing the Alternate Chairman in the absence of the PSC Chairman.

*See Page 6-5a

ADMINISTRATIVE CONTROLS

*If one of the above members of the Plant Safety Committee meets the qualification requirements for this position, the requirement to have this member is satisfied. This membership may be filled by two appropriately qualified individuals who shall ballot with a single combined vote. Generic qualifications for this membership shall be as follows:

One Individual

The Nuclear Software Expert shall have as a minimum a Bachelor's degree in Science or Engineering, Nuclear preferred (in accordance with ANSI N18.1). In addition, he shall have a minimum of four years of technical experience, of which a minimum of two years shall be in Nuclear Engineering and a minimum of two years shall be in Software Engineering. (Software Engineering is that branch of science and technology which deals with the design and use of software. Software Engineering is a discipline directed to the production and modification of computer programs that are correct, efficient, flexible, maintainable, and understandable, in reasonable time spans, and at reasonable costs). The two years of technical experience in Software Engineering may be general software experience not necessarily related to the software of the Core Protection Calculator System. One of these two years of experience shall be with certified computer programs.

Two Individuals

One of the individuals shall meet the requirements of the Nuclear Engineering portion of the above. The second individual shall have a Bachelor of Science degree (digital computer speciality) and meet the Software Engineering requirements of the above.

The membership (the Nuclear Software Expert or the Digital Computer Specialist) shall be knowledgeable of the Core Protection Calculator System with regard to:

- a. The software modules, their interactions with each other and with the data base.
- b. The relationship between operator's module inputs and the trip variables.
- c. The relationship between sensor input signals and the trip variable.
- d. The design basis of the Core Protection Calculator System.
- e. The approved software change procedure and documentation requirements of a software change.
- f. The security of the computer memory and access procedures to the memory.

ADMINISTRATIVE CONTROLS

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the PSC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PSC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The PSC shall meet at least once per calendar month and as convened by the PSC Chairman or his designated alternate.

QUORUM

6.5.1.5 The minimum quorum of the PSC necessary for the performance of the PSC responsibility and authority provisions of these technical specifications shall consist of the Chairman or his designated alternate and four members including alternates.

RESPONSIBILITIES

6.5.1.6 The Plant Safety Committee shall be responsible for:

- a. Review of 1) all procedures required by Specification 6.8 and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Executive Director, ANO Site Operations to affect nuclear safety.
- b. Review of all proposed tests and experiments that affect nuclear safety.
- c. Review of all proposed changes to Appendix "A" Technical Specifications.
- d. Review of all proposed changes or modifications to unit systems or equipment that affect nuclear safety.
- e. Investigation of all violations of the Technical Specifications, including the preparation and forwarding of reports covering evaluation and recommendation to prevent recurrence to the Executive Director, ANO Site Operations and to the Chairman of the Safety Review Committee.

ADMINISTRATIVE CONTROLS

- f. Review of events requiring 24 hours written notification to the Commission.
- g. Review of facility operations to detect potential nuclear safety hazards.
- h. Performance of special reviews, investigations or analyses, and reports thereon as requested by the Executive Director, ANO Site Operations or the Safety Review Committee.
- i. Review of the Plant Security Plan and implementing procedures and submittal of recommended changes to the Executive Director, ANO Site Operations and the Safety Review Committee.
- j. Review of the Emergency Plan and implementing procedures and submittal of recommended changes to the Executive Director, ANO Site Operations and Safety Review Committee.
- k. Review of changes to the Offsite Dose Calculation Manual and Process Control Program.

AUTHORITY

6.5.1.7 The Plant Safety Committee shall:

- a. Recommend in writing their approval or disapproval of items considered under 6.5.1.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.1.6(a) through (e) above constitutes an unreviewed safety question.
- c. Provide written notification within 24 hours to the Vice President, Nuclear Operations and the Safety Review Committee of disagreement between the PSC and the Executive Director, ANO Site Operations; however, the Executive Director, ANO Site Operations shall have responsibility for resolution of such disagreements pursuant to 6.1.1 above.

RECORDS

6.5.1.8 The Plant Safety Committee shall maintain written minutes of each PSC meeting that, at a minimum, document the results of all PSC activities performed under the responsibility and authority provisions of these technical specifications. Copies shall be provided to the Executive Director, ANO Site Operations and Chairman of the Safety Review Committee.

ADMINISTRATIVE CONTROLS

6.5.2 SAFETY REVIEW COMMITTEE (SRC)

FUNCTION

6.5.2.1 The Safety Review Committee shall function to provide independent review and audit of designated activities in the areas of:

- a. nuclear power plant operations
- b. nuclear engineering
- c. chemistry and radiochemistry
- d. metallurgy
- e. instrumentation and control
- f. radiological safety
- g. mechanical and electrical engineering
- h. quality assurance practices

COMPOSITION

6.5.2.2 The Safety Review Committee shall be composed of a Chairman and eight members which collectively have the experience and competence required by ANSI/ANS-3.1-1981 to review problems in the areas specified in Section 6.5.2.1, a-h.

The Vice President, Nuclear Operations shall designate, in writing, the Chairman and all SRC members.

The Chairman shall designate, in writing, the alternate Chairman in the absence of the SRC Chairman.

ADMINISTRATIVE CONTROLS

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

- a. The unit shall be placed in at least HOT STANDBY within one hour.
- b. The Safety Limit violation shall be reported to the Commission, the Vice President, Nuclear Operations and to the SRC within 24 hours.
- c. A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PSC. This report shall describe (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems or structures, and (3) corrective action taken to prevent recurrence.
- d. The Safety Limit Violation Report shall be submitted to the Commission, the SRC and the Vice President, Nuclear Operations within 14 days of the violation.

6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Refueling operations.
- c. Surveillance and test activities of safety related equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Fire Protection Program implementation.
- g. Modification of Core Protection Calculator (CPC) Addressable Constants. These procedures should include provisions to assure that sufficient margin is maintained in CPC Type I addressable constants to avoid excessive operator interaction with the CPCs during reactor operation.

NOTE: Modifications to the CPC software (including changes of algorithms and fuel cycle specific data) shall be performed in accordance with the most recent version of "CPC Protection Algorithm Software Change Procedure," CEN-39(A)-P that has been determined to be applicable to the facility. Additions or deletions to CPC addressable constants or changes to addressable constant software limit values shall not be implemented without prior NRC approval.

- h. New and spent fuel storage.
- i. ODCM and PCP implementation.
- j. Postaccident sampling (includes sampling of reactor coolant, radioactive iodines and particulates in plant gaseous effluent, and the containment atmosphere).

6.8.2 Each procedure of 6.8.1 above, the changes thereto, shall be reviewed by the PSC and approved by the Executive Director, ANO Site Operations; Plant Manager or responsible General Manager prior to implementation and reviewed periodically as set forth in administrative procedures.

ADMINISTRATIVE CONTROL

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 members of the plant management staff, at least one of whom holds a Senior Reactor Operator's License on the unit affected.
- c. The change is documented, reviewed by the PSC and approved by the Executive Director, ANO Site Operations; Plant Manager or responsible General Manager within 14 days of implementation.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS AND REPORTABLE OCCURRENCES

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 Administrator of the Regional Office unless otherwise noted.

STARTUP REPORT

6.9.1.1 A summary report of plant startup and power escalation testing shall 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 additional specific details required 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.