ENCLOSURE 1

CORRECTION PAGES
FOR PROPOSED CHANGE NPF-10/15-468, SUPPLEMENT 1

ATTACHMENT A
EXISTING PAGES
UNIT 2

5.5 Procedures, Programs, and Manuals

5.5.2.12 Ventilation Filter Testing Program (VFTP) (continued)

The provisions of Technical Specification Surveillance Requirement 3.0.2 and Technical Specification Surveillance Requirement 3.0.3 are applicable to the VFTP test frequencies.

5.5.2.13 Diesel Fuel Oil Testing Program

This program implements required testing of both new fuel oil and stored fuel oil. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM standards. The purpose of the program is to establish the following:

a. At least once per 92 days and from new fuel oil prior to addition to the storage tanks by verifying that a sample obtained in accordance with ASTM-D4057-81 has a water and sediment content of less than or equal to 0.05 volume percent, an API gravity or an absolute specific gravity within limits, and a kinematic viscosity @ 40 C of greater than or equal to 1.9 but less than or equal to 4.1 when tested in accordance with ASTM-D975-81.

b. At least once every 92 days by obtaining a sample of fuel oil in accordance with ASTM-D4057-81 and verifying that particulate contamination is less than 10mg/liter when checked in accordance with ASTM-D2276-83, Method A.

5.5.2.14 Configuration Risk Management Program (CRMP)

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for which a risk-informed Completion Time has been granted. The program shall include the following elements:

a. Provisions for the control and implementation of a Level 1 at power internal events PRA-informed methodology. The assessment shall be capable of evaluating the applicable plant configuration.

b. Provisions for performing an assessment prior to entering the LCO Condition for preplanned activities. C

c. Provisions for performing an assessment after entering the LCO Condition for unplanned entry into the LCO Condition.

5.5 Procedures, Programs, and Manuals

5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)

d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.

e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.

c

ATTACHMENT B
EXISTING PAGES
UNIT 3

5.5 Procedures, Programs, and Manuals

5.5.2.12 Ventilation Filter Testing Program (VFTP) (continued)

The provisions of Technical Specification Surveillance Requirement 3.0.2 and Technical Specification Surveillance Requirement 3.0.3 are applicable to the VFTP test frequencies.

5.5.2.13 Diesel Fuel Oil Testing Program

This program implements required testing of both new fuel oil and stored fuel oil. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with applicable ASTM standards. The purpose of the program is to establish the following:

a. At least once per 92 days and from new fuel oil prior to addition to the storage tanks by verifying that a sample obtained in accordance with ASTM-D4057-81 has a water and sediment content of less than or equal to 0.05 volume percent, an API gravity or an absolute specific gravity within limits, and a kinematic viscosity @ 40 C of greater than or equal to 1.9 but less than or equal to 4.1 when tested in accordance with ASTM-D975-81.

b. At least once every 92 days by obtaining a sample of fuel oil in accordance with ASTM-D4057-81 and verifying that particulate contamination is less than 10mg/liter when checked in accordance with ASTM-D2276-83, Method A.

5.5.2.14 Configuration Risk Management Program (CRMP)

The Configuration Risk Management Program (CRMP) provides a proceduralized risk-informed assessment to manage the risk associated with equipment inoperability. The program applies to technical specification structures, systems, or components for which a risk-informed Completion Time has been granted. The program shall include the following elements:

a. Provisions for the control and implementation of a Level 1 at power internal events PRA-informed methodology. The assessment shall be capable of evaluating the applicable plant configuration.

b. Provisions for performing an assessment prior to entering the LCO Condition for preplanned activities.

c. Provisions for performing an assessment after entering the LCO Condition for unplanned entry into the LCO Condition.

5.5 Procedures, Programs, and Manuals

5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)

d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.

e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.

C

ATTACHMENT C
PROPOSED PAGES
REDLINE AND STRIKEOUT
UNIT 2

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)

d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.

e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.

5.5.2.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, P_a, is 55.1 psig (P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.6 psig) for the purpose of containment testing in accordance with this Technical Specification). C

The maximum allowable containment leakage rate, L_a, at P_a, shall be 0.10% of containment air weight per day.

Leakage rate acceptance criteria are:

a. The Containment overall leakage rate acceptance criterion is $\leq 1.0\ L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60\ L_a$ for the Type B and Type C tests and $\leq 0.75\ L_a$ for the Type A tests;

b. Air lock testing acceptance criteria are:

1) Overall air lock leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$.

2) For each door, the leakage rate is $\leq 0.01\ L_a$ when pressurized to ≥ 9.0 psig.

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.15 Containment Leakage Rate Testing Program (Continued)

The provisions of Surveillance Requirement 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program. However, test frequencies specified in this Program may be extended consistent with the guidance provided in NEI 94-01, "Industry Guideline For Implementing Performance-Based Option Of 10CFR 50, Appendix J," as endorsed by Regulatory Guide 1.163. Specifically, NEI 94-01 has these provisions for test frequencies extension:

1. Consistent with standard scheduling practices for Technical Specifications Required Surveillances, intervals for recommended Type A testing may be extended by up to 15 months. This option should be used only in cases where refueling schedules have been changed to accommodate other factors.

2. Consistent with standard scheduling practices for Technical Specifications Required Surveillances, intervals for the recommended surveillance frequency for Type B and Type C testing may be extended by up to 25 percent of the test interval, not to exceed 15 months.

The provisions of Surveillance Requirement 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

BASES

BACKGROUND (continued)

2. closed by manual valves, blind flanges, or de-activated automatic valves secured in their closed positions, except as provided in LCO 3.6.3, "Containment Isolation Valves."

b. Each air lock is OPERABLE, except as provided in LCO 3.6.2, "Containment Air Locks."

APPLICABLE SAFETY ANALYSES

The safety design basis for the containment is that the containment must withstand the pressures and temperatures of the limiting DBA without exceeding the design leakage rate.

The DBAs that result in a release of radioactive material within containment are a loss of coolant accident, a main steam line break (MSLB), and a control element assembly ejection accident (Ref. 2). In the analysis of each of these accidents, it is assumed that containment is OPERABLE such that release of fission products to the environment is controlled by the rate of containment leakage. The containment was designed with an allowable leakage rate of 0.10% of containment air weight per day (Ref. 3). This leakage rate is defined in 10 CFR 50, Appendix J, Option B (Ref. 1), as L_a: the maximum allowable containment leakage rate at the calculated maximum peak containment ~~pressure (P_a) of 56.6 psig, which results from the limiting DBA, which is a design basis MSLB (Ref. 5).~~ internal pressure related to the design basis loss-of-coolant accident, P_a, at 55.1 psig (Ref. 5). P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure of the design basis Main Steam Line Break, 56.6 psig (Ref. 5), for the purpose of containment testing in accordance with this Technical Specification. c

Satisfactory leakage rate test results are a requirement for the establishment of containment OPERABILITY.

The containment satisfies Criterion 3 of the NRC Policy Statement.

LCO

Containment OPERABILITY is maintained by limiting leakage to ~~within the acceptance criteria of 10 CFR 50, Appendix J (Ref. 1)~~ $\leq$ 1.0 L_a, except prior to the first startup after performing a required Containment Leakage Rate Testing Program leakage test. At this time, the applicable leakage limits must be met.

Compliance with this LCO will ensure a containment configuration, including equipment hatches, that is structurally sound and that will limit leakage to those leakage rates assumed in the safety analysis.

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

For atmospheric containment, the DBAs that result in a release of radioactive material within containment are a loss of coolant accident (LOCA), a main steam line break (MSLB) and a control element assembly (CEA) ejection accident (Ref. 2). In the analysis of each of these accidents, it is assumed that containment is OPERABLE such that release of fission products to the environment is controlled by the rate of containment leakage. The containment was designed with an allowable leakage rate of 0.10% of containment air weight per day (Ref. 2). This leakage rate is defined in 10 CFR 50, Appendix J, Option B (Ref. 1), as L_a: the maximum allowable containment leakage rate at the calculated maximum peak containment internal pressure~~, (P_a) of 56.6 psig, which results from the limiting DBA, which is design basis MSLB (Ref. 3).~~ related to the design basis loss-of-coolant accident, P_a, at 55.1 psig (Ref. 3). P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure of the design basis Main Steam Line Break, 56.6 psig (Ref. 3), for the purpose of containment testing in accordance with this Technical Specification. This allowable leakage rate forms the basis for the acceptance criteria imposed on the SRs associated with the air lock.

The containment air locks satisfy Criterion 3 of the NRC Policy Statement.

LCO

Each containment air lock forms part of the containment pressure boundary. As part of the containment pressure boundary, the air lock safety function is related to control of the containment leakage rate resulting from a DBA. Thus, each air lock's structural integrity and leak tightness are essential to the successful mitigation of such an event.

Each air lock is required to be OPERABLE. For the air lock to be considered OPERABLE, the air lock interlock mechanism must be OPERABLE, the air lock must be in compliance with the Type B air lock leakage test, and both air lock doors must be OPERABLE. The door seals and sealing surface are considered a part of the air lock. The interlock allows only one air lock door of an air lock to be opened at one time. This provision ensures that a gross breach of containment does not exist when containment is required to be OPERABLE. Closure of a single door in each air lock is sufficient to provide a leak tight barrier following postulated events. Nevertheless, both doors are kept closed when the air lock is not being used for normal entry into ~~and~~ or exit from containment.

(continued)

ATTACHMENT D
PROPOSED PAGES
REDLINE AND STRIKEOUT
UNIT 3

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)

d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.

e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.

5.5.2.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program", dated September 1995.

The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, P_a, is 55.1 psig (P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.6 psig) for the purpose of containment testing in accordance with this Technical Specification).

The maximum allowable containment leakage rate, L_a, at P_a, shall be 0.10% of containment air weight per day.

Leakage rate acceptance criteria are:

a. The Containment overall leakage rate acceptance criterion is $\leq$ 1.0 L_a. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq$ 0.60 L_a for the Type B and Type C tests and $\leq$ 0.75 L_a for the Type A tests;

b. Air lock testing acceptance criteria are:

1) Overall air lock leakage rate is $\leq$ 0.05 L_a when tested at $\geq P_a$.

2) For each door, the leakage rate is $\leq$ 0.01 L_a when pressurized to $\geq$ 9.0 psig.

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.15 Containment Leakage Rate Testing Program (Continued)

The provisions of Surveillance Requirement 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program. However, test frequencies specified in this Program may be extended consistent with the guidance provided in NEI 94-01, "Industry Guideline For Implementing Performance-Based Option Of 10CFR 50, Appendix J," as endorsed by Regulatory Guide 1.163. Specifically, NEI 94-01 has these provisions for test frequencies extension:

1. Consistent with standard scheduling practices for Technical Specifications Required Surveillances, intervals for recommended Type A testing may be extended by up to 15 months. This option should be used only in cases where refueling schedules have been changed to accommodate other factors.

2. Consistent with standard scheduling practices for Technical Specifications Required Surveillances, intervals for the recommended surveillance frequency for Type B and Type C testing may be extended by up to 25 percent of the test interval, not to exceed 15 months.

The provisions of Surveillance Requirement 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

BASES

BACKGROUND (continued)

2. closed by manual valves, blind flanges, or de-activated automatic valves secured in their closed positions, except as provided in LCO 3.6.3, "Containment Isolation Valves."

b. Each air lock is OPERABLE, except as provided in LCO 3.6.2, "Containment Air Locks."

APPLICABLE SAFETY ANALYSES

The safety design basis for the containment is that the containment must withstand the pressures and temperatures of the limiting DBA without exceeding the design leakage rate.

The DBAs that result in a release of radioactive material within containment are a loss of coolant accident, a main steam line break (MSLB), and a control element assembly ejection accident (Ref. 2). In the analysis of each of these accidents, it is assumed that containment is OPERABLE such that release of fission products to the environment is controlled by the rate of containment leakage. The containment was designed with an allowable leakage rate of 0.10% of containment air weight per day (Ref. 3). This leakage rate is defined in 10 CFR 50, Appendix J, Option B (Ref. 1), as L_a: the maximum allowable containment leakage rate at the calculated maximum peak containment ~~pressure (P_a) of 56.6 psig, which results from the limiting DBA, which is a design basis MSLB (Ref. 5).~~ internal pressure related to the design basis loss-of-coolant accident, P_a, at 55.1 psig (Ref. 5). P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure of the design basis Main Steam Line Break, 56.6 psig (Ref. 5), for the purpose of containment testing in accordance with this Technical Specification.

Satisfactory leakage rate test results are a requirement for the establishment of containment OPERABILITY.

The containment satisfies Criterion 3 of the NRC Policy Statement.

LCO

Containment OPERABILITY is maintained by limiting leakage to ~~within the acceptance criteria of 10 CFR 50, Appendix J (Ref. 1)~~ $\leq$ 1.0 L_a, except prior to the first startup after performing a required Containment Leakage Rate Testing Program leakage test. At this time, the applicable leakage limits must be met.

Compliance with this LCO will ensure a containment configuration, including equipment hatches, that is structurally sound and that will limit leakage to those leakage rates assumed in the safety analysis.

(continued)

BASES (continued)

APPLICABLE SAFETY ANALYSES

For atmospheric containment, the DBAs that result in a release of radioactive material within containment are a loss of coolant accident (LOCA), a main steam line break (MSLB) and a control element assembly (CEA) ejection accident (Ref. 2). In the analysis of each of these accidents, it is assumed that containment is OPERABLE such that release of fission products to the environment is controlled by the rate of containment leakage. The containment was designed with an allowable leakage rate of 0.10% of containment air weight per day (Ref. 2). This leakage rate is defined in 10 CFR 50, Appendix J, Option B (Ref. 1), as L_a: the maximum allowable containment leakage rate at the calculated maximum peak containment internal pressure~~, (P_a) of 56.6 psig, which results from the limiting DBA, which is design basis MSLB (Ref. 3).~~ related to the design basis loss-of-coolant accident, P_a, at 55.1 psig (Ref. 3). P_a will conservatively be assumed to be equal to the calculated peak containment internal pressureof the design basis Main Steam Line Break, 56.6 psig (Ref. 3), for the purpose of containment testing in accordance with this Technical Specification. This allowable leakage rate forms the basis for the acceptance criteria imposed on the SRs associated with the air lock.

The containment air locks satisfy Criterion 3 of the NRC Policy Statement.

LCO

Each containment air lock forms part of the containment pressure boundary. As part of the containment pressure boundary, the air lock safety function is related to control of the containment leakage rate resulting from a DBA. Thus, each air lock's structural integrity and leak tightness are essential to the successful mitigation of such an event.

Each air lock is required to be OPERABLE. For the air lock to be considered OPERABLE, the air lock interlock mechanism must be OPERABLE, the air lock must be in compliance with the Type B air lock leakage test, and both air lock doors must be OPERABLE. The door seals and sealing surface are considered a part of the air lock. The interlock allows only one air lock door of an air lock to be opened at one time. This provision ensures that a gross breach of containment does not exist when containment is required to be OPERABLE. Closure of a single door in each air lock is sufficient to provide a leak tight barrier following postulated events. Nevertheless, both doors are kept closed when the air lock is not being used for normal entry into ~~and~~or exit from containment.

(continued)

ATTACHMENT E
UNIT 2
PROPOSED PAGES

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)

d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.

e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.

5.5.2.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," dated September 1995.

The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, P_a, is 55.1 psig (P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.6 psig) for the purpose of containment testing in accordance with this Technical Specification).

The maximum allowable containment leakage rate, L_a, at P_a, shall be 0.10% of containment air weight per day.

Leakage rate acceptance criteria are:

a. The Containment overall leakage rate acceptance criterion is $\leq 1.0\ L_a$. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60\ L_a$ for the Type B and Type C tests and $\leq 0.75\ L_a$ for the Type A tests;

b. Air lock testing acceptance criteria are:

1) Overall air lock leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$.

2) For each door, the leakage rate is $\leq 0.01\ L_a$ when pressurized to ≥ 9.0 psig.

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.15 Containment Leakage Rate Testing Program (Continued)

The provisions of Surveillance Requirement 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program. However, test frequencies specified in this Program may be extended consistent with the guidance provided in NEI 94-01, "Industry Guideline For Implementing Performance-Based Option Of 10CFR 50, Appendix J," as endorsed by Regulatory Guide 1.163. Specifically, NEI 94-01 has these provisions for test frequencies extension:

2. Consistent with standard scheduling practices for Technical Specifications Required Surveillances, intervals for recommended Type A testing may be extended by up to 15 months. This option should be used only in cases where refueling schedules have been changed to accommodate other factors.

2. Consistent with standard scheduling practices for Technical Specifications Required Surveillances, intervals for the recommended surveillance frequency for Type B and Type C testing may be extended by up to 25 percent of the test interval, not to exceed 15 months.

The provisions of Surveillance Requirement 3.0.3 are applicable to the Containment Leakage Rate Testing Program.

ATTACHMENT F
UNIT 3
PROPOSED PAGES

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.14 Configuration Risk Management Program (CRMP) (Continued)

d. Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO Condition.

e. Provisions for considering other applicable risk significant contributors such as Level 2 issues, and external events, qualitatively or quantitatively.

5.5.2.15 Containment Leakage Rate Testing Program

A program shall be established to implement the leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program", dated September 1995.

The calculated peak containment internal pressure related to the design basis loss-of-coolant accident, P_a, is 55.1 psig (P_a will conservatively be assumed to be equal to the calculated peak containment internal pressure for the design basis Main Steam Line Break (56.6 psig) for the purpose of containment testing in accordance with this Technical Specification).

The maximum allowable containment leakage rate, L_a, at P_a, shall be 0.10% of containment air weight per day.

Leakage rate acceptance criteria are:

a. The Containment overall leakage rate acceptance criterion is $\leq$ 1.0 L_a. During the first unit startup following testing in accordance with this program, the leakage rate acceptance criteria are $\leq$ 0.60 L_a for the Type B and Type C tests and $\leq$ 0.75 L_a for the Type A tests;

b. Air lock testing acceptance criteria are:

1) Overall air lock leakage rate is $\leq$ 0.05 L_a when tested at $\geq$ P_a.

2) For each door, the leakage rate is $\leq$ 0.01 L_a when pressurized to $\geq$ 9.0 psig.

5.5 Procedures, Programs, and Manuals (continued)

5.5.2.15 Containment Leakage Rate Testing Program (Continued)

The provisions of Surveillance Requirement 3.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program. However, test frequencies specified in this Program may be extended consistent with the guidance provided in NEI 94-01, "Industry Guideline For Implementing Performance-Based Option Of 10CFR 50, Appendix J," as endorsed by Regulatory Guide 1.163. Specifically, NEI 94-01 has these provisions for test frequencies extension:

1. Consistent with standard scheduling practices for Technical Specifications Required Surveillances, intervals for recommended Type A testing may be extended by up to 15 months. This option should be used only in cases where refueling schedules have been changed to accommodate other factors.

2. Consistent with standard scheduling practices for Technical Specifications Required Surveillances, intervals for the recommended surveillance frequency for Type B and Type C testing may be extended by up to 25 percent of the test interval, not to exceed 15 months.

The provisions of Surveillance Requirement 3.0.3 are applicable to the Containment Leakage Rate Testing Program.