INSERT THIS PAGE IN FRONT OF VOLUME 2

Volume 2 SECTION 1.0, 2.0 & 3.0	
Remove	**Replace**
B 3.0 ITS pg B 3.0-5 Rev 0	B 3.0 ITS pg B 3.0-5 Rev 9
3.0 CTS M/U 3/4 0-1 (2) pg 3 of 12 Rev 0	3.0 CTS M/U 3/4 0-1 (2) pg 3 of 12 Rev 9
B 3.0 NUREG M/U pg B 3.0-4	B 3.0 NUREG M/U pg B 3.0-4 Rev 9
B 3.0 NUREG M/U pg B 3.0-5	B 3.0 NUREG M/U pg B 3.0-5 Rev 9

BASES

LCO 3.0.3 (continued)

ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.7, "Spent Fuel Storage Pool Water Level." LCO 3.7.7 has an Applicability of "During movement of irradiated fuel assemblies in the spent fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.7 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.7 of "Suspend movement of irradiated fuel assemblies in the spent fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

a. Unit conditions are such that the requirements of the LCO would not be met in the Applicability desired to be entered; and

b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made

INSERT 3.0-4

When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

Exceptions to this Specification are stated in the individual Specifications.

RAI-1

LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

INSERT 3.0-5

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

BASES

LCO 3.0.3 (continued)

A unit shutdown required in accordance with LCO 3.0.3 may be terminated and LCO 3.0.3 exited if any of the following occurs:

a. The LCO is now met.

b. A Condition exists for which the Required Actions have now been performed.

c. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time LCO 3.0.3 is exited.

The time limits of ~~Specification~~ LCO 3.0.3 allow 37 hours for the unit to be in MODE 4 when a shutdown is required during MODE 1 operation. If the unit is in a lower MODE of operation when a shutdown is required, the time limit for reaching the next lower MODE applies. If a lower MODE is reached in less time than allowed, ~~however,~~ the total allowable time to reach MODE 4, or other applicable MODE, is not reduced. For example, if MODE 2 is reached in 2 hours, then the time allowed for reaching MODE 3 is the next 11 hours, because the total time for reaching MODE 3 is not reduced from the allowable limit of 13 hours. Therefore, if remedial measures are completed that would permit a return to MODE 1, a penalty is not incurred by having to reach a lower MODE of operation in less than the total time allowed.

In MODES 1, 2, and 3, LCO 3.0.3 provides actions for Conditions not covered in other Specifications. The requirements of LCO 3.0.3 do not apply in MODES 4 and 5 because the unit is already in the most restrictive Condition required by LCO 3.0.3. The requirements of LCO 3.0.3 do not apply in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.8, "Spent Fuel Storage Pool Water Level." LCO 3.7.8 has an Applicability of "During movement of irradiated fuel

(continued)

Rev 9

BASES

LCO 3.0.3 (continued)

assemblies in the spent fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.8 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.8 of "Suspend movement of irradiated fuel assemblies in the spent fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

a. Unit conditions are such that the requirements of the LCO would not be met in the Applicability desired to be entered; and

b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability

(continued)

REV 9

INSERT THIS PAGE IN FRONT OF VOLUME 10

Volume 10 SECTION 3.9, 3.10, 4.0 & 5.0	
Remove	**Replace**
4.0 NUREG M/U pg 4.0-1	4.0 NUREG M/U pg 4.0-1 Rev 9
4.0 NUREG M/U pg 4.0-2	4.0 NUREG M/U pg 4.0-2 Rev 9
4.0 JFD's pg 1 Rev 0	4.0 JFD's pg 1 Rev 9
5.2 DOCs pg 1 Rev 0	5.2 DOCs pg 1 Rev 9
5.4 ITS pg 5.0-6 Rev 0	5.4 ITS pg 5.0-6 Rev 9
5.4 DOCs pg 2 Rev 0	5.4 DOCs pg 2 Rev 9
5.4 DOCs pg 3 Rev 0	5.4 DOCs pg 3 Rev 9
5.4 NUREG M/U pg 5.0-6	5.4 NUREG M/U pg 5.0-6 Rev 9
5.5 ITS pg 5.0-11 Rev 0	5.5 ITS pg 5.0-11 Rev 9
5.5 ITS pg 5.0-13 Rev 0	5.5 ITS pg 5.0-13 Rev 9
5.5 ITS pg 5.0-14 Rev 0	5.5 ITS pg 5.0-14 Rev 9
5.5 ITS pg 5.0-15 Rev 0	5.5 ITS pg 5.0-15 Rev 9
5.5 ITS pg 5.0-18 Rev 0	5.5 ITS pg 5.0-18 Rev 9
5.5 ITS pg 5.0-19 Rev 2	5.5 ITS pg 5.0-19 Rev 9
5.5 ITS pg 5.0-19(i) Rev 2	--
5.5 CTS M/U (1-4) pg 1 of 24	5.5 CTS M/U (1-4) pg 1 of 24 Rev 9
5.5 CTS M/U (3/4 0-2) pg 2 of 24	5.5 CTS M/U (3/4 0-2) pg 2 of 24 Rev 9
5.5 CTS M/U (3/4 6-55) pg 10 of 24	5.5 CTS M/U (3/4 6-55) pg 10 of 24 Rev 9
5.5 CTS M/U (3/4 7-3) pg 12 of 24	5.5 CTS M/U (3/4 7-3) pg 12 of 24 Rev 9
5.5 CTS M/U (6-16b) pg 23 of 24	5.5 CTS M/U (6-16b) pg 23 of 24 Rev 9
5.5 CTS M/U (6-16c) pg 23a of 24	5.5 CTS M/U (6-16c) pg 23a of 24 Rev 9
5.5 CTS M/U (6-24) pg 24 of 24	5.5 CTS M/U (6-24) pg 24 of 24 Rev 9
5.5 DOCs pg 1 Rev 0	5.5 DOCs pg 1 Rev 9
5.5 DOCs pg 3 Rev 2	5.5 DOCs pg 3 Rev 9
5.5 DOCs pg 3(i) Rev 2	--
5.5 DOC's pg 3(ii) Rev 2	--
5.5 DOCs pg 4 Rev 0	5.5 DOCs pg 4 Rev 9
5.5 DOCs pg 5 Rev 0	5.5 DOCs pg 5 Rev 9
5.5 DOCs pg 6 Rev 0	5.5 DOCs pg 6 Rev 9

Volume 10 SECTION 3.9, 3.10, 4.0 & 5.0 (cont'd)	
Remove	**Replace**
5.5 DOCs pg 7 Rev 0	5.5 DOCs pg 7 Rev 9
--	5.5 DOCs pg 8 Rev 9
5.5 NUREG M/U pg 5.0-11	5.5 NUREG M/U pg 5.0-11 Rev 9
5.5 NUREG M/U pg 5.0-12	5.5 NUREG M/U pg 5.0-12 Rev 9
5.5 NUREG M/U pg 5.0-13	5.5 NUREG M/U pg 5.0-13 Rev 9
5.5 NUREG M/U pg 5.0-13 (Insert)	5.5 NUREG M/U pg 5.0-13 (Insert) Rev 9
5.5 NUREG M/U pg 5.0-17	5.5 NUREG M/U pg 5.0-17 Rev 9
5.5 NUREG M/U pg 5.0-17(3) (Insert)	5.5 NUREG M/U pg 5.0-17(3) (Insert) Rev 9
5.5 JFD's pg 1 Rev 0	5.5 JFD's pg 1 Rev 9
5.6 DOCs pg 2 Rev 0	5.6 DOCs pg 2 Rev 9

4.0 DESIGN FEATURES

<CTS>

4.1 Site Location ~~[Text description of site location.]~~ Insert 4.0-1 <5.1>

4.2 Reactor Core

4.2.1 Fuel Assemblies

764 <5.3.1>

The reactor shall contain ~~[560]~~ fuel assemblies. Each assembly shall consist of a matrix of ~~[~~Zircalloy ~~or ZIRLO]~~ fuel rods with an initial composition of natural or slightly enriched uranium dioxide (UO_2) as fuel material~~[,~~ and water rods~~]~~. Limited substitutions of zirconium alloy or stainless steel filler rods for fuel rods, in accordance with approved applications of fuel rod configurations, may be used. Fuel assemblies shall be limited to those fuel designs that have been analyzed with NRC staff approved codes and methods and have been shown by tests or analyses to comply with all safety design bases. A limited number of lead test assemblies that have not completed representative testing may be placed in nonlimiting core regions.

4.2.2 Control Rod Assemblies

185

The reactor core shall contain ~~[137]~~ cruciform shaped control rod assemblies. The control material shall be ~~[~~boron carbide, hafnium metal~~]~~ as approved by the NRC. <5.3.2>

and/or

4.3 Fuel Storage

RAI-1

~~4.3.1~~ Criticality <5.6.1>

4.3.1.1 The spent fuel storage racks are designed and shall be maintained with:

a. Fuel assemblies having a maximum ~~k~~-infinity of ~~[~~1.31~~]~~ in the normal reactor core configuration at cold conditions~~[~~ ~~[average U-235 enrichment of [4.5] weight percent]~~; <DOC M.1>

b. $k_{eff} \leq 0.95$ if fully flooded with unborated water, which includes an allowance for uncertainties as described in ~~[~~Section 9.1 of the FSAR~~]~~; and <5.6.1.a>

u

(continued)

REV 9

4.0 DESIGN FEATURES

4.3 Fuel Storage (continued)

6.22 <CTS>

c. A nominal ~~[6.6]~~ inch center to center distance between fuel assemblies placed in the storage racks. <5.6.1.b>

high density

P.1

and a nominal 11.9 x 6.6 inch center to center distance between fuel assemblies placed in the low density storage racks.

4.3.1.2 The new fuel storage racks are designed and shall be maintained with:

a. Fuel assemblies having a maximum [k-infinity of ~~[1.31]~~ in the normal reactor core configuration at cold conditions] ~~[~~average U-235 enrichment of [4.5] weight percent~~]~~;

b. $k_{eff} \leq 0.95$ if fully flooded with unborated water, which includes an allowance for uncertainties as described in ~~[~~Section 9.1 of the FSAR~~]~~;

c. $k_{eff} \leq 0.98$ if moderated by aqueous foam, which includes an allowance for uncertainties as described in [Section 9.1 of the FSAR]; and

d. A nominal ~~[6.50]~~ inch center to center distance between fuel assemblies placed in storage racks.

P.1

RAI-1

4.3.2 Drainage

The spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool below elevation ~~[105 ft]~~. 660 ft. 11.5 inches

4.3.3 Capacity

The spent fuel storage pool is designed and shall be maintained with a storage capacity limited to no more than ~~[2045]~~ fuel assemblies. 2414

REV 9

JUSTIFICATION FOR DIFFERENCES FROM NUREG - 1433
ITS: CHAPTER 4.0 - DESIGN FEATURES

NON-BRACKETED PLANT SPECIFIC CHANGES

P.1 These changes are made to NUREG-1433 to reflect Fermi 2 current licensing basis; including design features, existing license requirements and commitments. Additional rewording, reformatting, and revised numbering is made to incorporate these changes consistent with Writer's Guide conventions.

P.2 Not used.

P.3 Not used.

P.4 Not used.

RA1-1

DISCUSSION OF CHANGES
ITS: SECTION 5.2 - ORGANIZATION

ADMINISTRATIVE

A.1 In the conversion of the Fermi 2 current Technical Specifications (CTS) to the proposed plant specific Improved Technical Specifications (ITS), certain wording preferences or conventions are adopted which do not result in technical changes (either actual or interpretational). Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.

A.2 The STA requirements of CTS 6.2.4.1 are modified to reference the Commission Policy Statement on Engineering Expertise on Shift in ITS 5.2. Since the policy statement encompasses the current requirements, this change is administrative with no impact on safety.

A.3 CTS 6.2.2.c footnote has been modified in a Note to ITS 5.0 which clarifies the wording and intent of this CTS footnote. Since this is a clarification of intent which is consistent with current Technical Specifications, this change is administrative and will not impact safety. Also, for consistency, CTS 6.2.1.c and 6.8.6 references to "health physics" are revised to "radiation protection." RAI-1

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE
"Generic"

LA.1 CTS 6.2.2 specifies the unit staff requirements and CTS Table 6.2.2-1, specifically defines the number of licensed operators required for each position and limitation on absences. These details are also defined in UFSAR Section 13.1.2.5. Changes to the UFSAR are controlled in accordance with 10 CFR 50.59. The minimum shift crew requirements for licensed operators and senior reactor operators are contained in 10 CFR 50.54 (k), (l), and (m) and do not need to be repeated in the ITS. The minimum shift crew requirements for non-licensed plant equipment operators (i.e., Nuclear Power Plant Operators or Nuclear Assistant Power Plant

5.0 ADMINISTRATIVE CONTROLS

5.4 Procedures

5.4.1 Written procedures shall be established, implemented, and maintained covering the following activities:

a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978;

b. The emergency operating procedures required to implement the requirements of NUREG-0737 and to NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;

c. Quality assurance for effluent and environmental monitoring;

d. Fire Protection Program implementation; and

e. All programs specified in Specification 5.5.

RAI - VERBAL

DISCUSSION OF CHANGES
ITS: SECTION 5.4 - PROCEDURES

TECHNICAL CHANGES - LESS RESTRICTIVE

"Generic"

LA.1 CTS 6.8.1.j details the specific guidance documents requiring written procedures for the Quality Assurance Program for effluent and environmental monitoring. ITS 5.5.1.d requires that, "Written procedures shall be established, implemented, and maintained covering … Quality assurance for effluent and environmental monitoring," but does not provide specific details on the guidance documents for these quality assurance activities. Defining these guidance documents in ITS is not necessary to ensure a successful Quality Assurance Program for effluent and environmental monitoring. Therefore, these details will be relocated to the QA Program. This change is consistent with NUREG-1433. The information moved to the QA Program requires changes to be controlled in accordance with 10CFR50.54(a). This relocation continues to provide adequate protection of the public health and safety since the requirement that written procedures shall be established, implemented, and maintained covering quality assurance for effluent and environmental monitoring continues to be required by the Technical Specifications.

RAI 0.0-1

LA.2 CTS 6.8.1.b requires procedures to implement commitments made in response to NUREG-0737. ITS 5.4.1.b requires only procedures to cover the emergency operating procedures that are required to meet NUREG-0737 (a reference to NUREG-0737 Supplement 1 and Generic Letter 82-33 is added for clarity and completeness; this reflects an administrative change discussed here for completeness). Commitments for other procedures recommended in NUREG-0737 are being relocated to UFSAR Section 13.5. Prescribing these commitments within the ITS is not necessary to provide adequate protection of the public health and safety since the requirement that written procedures shall be established, implemented, and maintained covering the remainder of the NUREG-0737 commitments can be adequately controlled by 10CFR50.59. This change is consistent with NUREG-1433.

RAI-VERBAL

LA.3 CTS 6.8.1.h required procedures to cover the Process Control Program (PCP) implementation. ITS does not retain this requirement. Commitments for PCP implementation procedures are relocated to the UFSAR. Prescribing these commitments within the ITS is not necessary to provide adequate protection of the public health and safety since the requirement that written procedures shall be established, implemented, and maintained commitments can be adequately controlled by 10CFR50.59. This change is consistent with NUREG-1433. | RAI 0.0-1

TECHNICAL CHANGES - LESS RESTRICTIVE

"Specific"

None

RELOCATED SPECIFICATIONS

None

5.0 ADMINISTRATIVE CONTROLS <CTS>

5.4 Procedures <6.8>

5.4.1 Written procedures shall be established, implemented, and maintained covering the following activities: <6.8.1>

a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978; <6.8.1.a> (A)

b. The emergency operating procedures required to implement the requirements of NUREG-0737 and to NUREG-0737, Supplement 1, as stated in [Generic Letter 82-33]; <6.8.1.b>

c. Quality assurance for effluent and environmental monitoring; <6.8.1.j>

d. Fire Protection Program implementation; and <6.8.1.g>

e. All programs specified in Specification 5.5. <DOC M.1>

Rev 9

5.5 Programs and Manuals (continued)

5.5.5 Component Cyclic or Transient Limit

This program provides controls to track the UFSAR Section 5.2.1.2 cyclic and transient occurrences to ensure that components are maintained within the design limits.

5.5.6 Inservice Testing and Inspection Program

(B) These programs provide controls for inservice testing and inspection of ASME Code Class 1, 2, and 3 components. The program shall include the following:

a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda are as follows:

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing and inspection activities	Required Frequencies for performing inservice testing and inspection activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing and inspection activities;

c. The provisions of SR 3.0.3 are applicable to inservice testing and inspection activities; and

d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS.

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1980 at the system flowrate specified below ± 10%.

ESF Ventilation System	Flowrate (cfm)	Penetration and System Bypass
Standby Gas Treatment	3800	0.05%
Control Room Emergency Filtration	1800 (makeup filter) 3000 (recirculation filter)	1.0%

c. The following tests shall be performed:

1. Once per 18 months;
2. After 720 hours of system operation;
3. After any structural maintenance on the HEPA filter or charcoal adsorber housing; and
4. Following painting, fire, or chemical release in any ventilation zone communicating with the subsystem while it is in operation.

Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and at the relative humidity specified below.

ESF Ventilation System	Penetration	RH
Standby Gas Treatment	0.100%	70%
Control Room Emergency Filtration	1.0%	70%

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

d. The following tests shall be performed once per 18 months.

(A)

Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters (CREF only), and the charcoal adsorbers is less than the value specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1980 at the system flowrate specified as follows ± 10%:

ESF Ventilation System	Delta P (inches water gauge)	Flowrate (cfm)
Standby Gas Treatment	11.0	3800
Control Room Emergency Filtration (CREF)	6.0 (makeup train) 8.0 (recirculation train)	1800 3000

(A)

e. The following tests shall be performed once per 18 months.

Demonstrate that the heaters for each of the ESF system dissipate the value specified below when tested in accordance with ASME N510-1980:

ESF Ventilation System	Wattage (kW)
Standby Gas Treatment	≥ 24
Control Room Emergency Makeup Inlet Air	12.0 ± 2.0

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

(continued)

5.5 Programs and Manuals (continued)

5.5.8 Explosive Gas and Storage Tank Radioactivity Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the Main Condenser offgas treatment system, and the quantity of radioactivity contained in temporary outdoor storage tanks.

The program shall include:

a. A limit of ≤ 4% by volume for concentration of hydrogen in the main condenser offgas treatment system and a surveillance program to ensure the limit is maintained.

b. A surveillance program to ensure that the quantity of radioactivity contained in any outdoor liquid radwaste tank that is not surrounded by liners, dikes, or walls, capable of holding the tank's contents and that does not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system is ≤ 10 curies, excluding tritium and dissolved or entrained noble gases.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

5.5.9 Emergency Diesel Generator Fuel Oil Testing Program

An emergency diesel generator fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. 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. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:

1. an API gravity or an absolute specific gravity within limits,

2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and

3. a clear and bright appearance with proper color;

(continued)

5.5 Programs and Manuals

5.5.11 Safety Function Determination Program (SFDP) (continued)

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

5.5.12 Primary Containment Leakage Rate Testing Program

a. A program shall be established to implement the leakage rate testing of the primary 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, with the exception of approved exemptions to 10 CFR 50, Appendix J.

b. The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 56.5 psig.

c. The maximum allowable containment leakage rate L_a, at P_a, shall be 0.5% of containment air weight per day.

d. Leakage Rate acceptance criteria are:

1. Containment 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 required Type B and C tests and $\leq 0.75\ L_a$ for Type A tests.

2. Air lock testing acceptance criteria are:

i) Overall air lock leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$.
ii) For each door, leakage rate is ≤ 5 scf per hour when the gap between the door seals is pressurized to $\geq P_a$.

e. The provisions of SR 3.0.2 do not apply to the test frequencies in the Primary Containment Leakage Rate Testing Program.

(continued)

5.5 Programs and Manuals

5.5.12 Primary Containment Leakage Rate Testing Program (continued)

f. The provisions of SR 3.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

5.5.13 High Density Spent Fuel Racks

A program shall be provided which will assure that any unanticipated degradation of the high density spent fuel racks will be detected and will not compromise the integrity of the racks.

RAIs 5.5.14

SPECIFICATION 5.5

(A.1)

(Also see Specification 1.0)

DEFINITIONS

MINIMUM CRITICAL POWER RATIO

1.22 The MINIMUM CRITICAL POWER RATIO (MCPR) shall be the smallest CPR which exists in the core.

see Specification 1.0

OFF-GAS TREATMENT SYSTEM

1.23 An OFF-GAS TREATMENT SYSTEM is any system designed and installed to reduce radioactive gaseous effluents by collecting reactor coolant system offgases from the reactor coolant and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

OFFSITE DOSE CALCULATION MANUAL

5.5.1.a.1 ~~1.24~~ The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls required by Section 6.8.5 and Radiological Environmental Monitoring Programs and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.9.1.7 and 6.9.1.8.

5.5.1.a.2

(A)

OPERABLE - OPERABILITY

1.25 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s) and when all necessary attendant instrumentation, controls, electrical power, 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).

OPERATIONAL CONDITION - CONDITION

1.26 An OPERATIONAL CONDITION, i.e., CONDITION, shall be any one inclusive combination of mode switch position and average reactor coolant temperature as specified in Table 1.2.

see Specification 1.0

PHYSICS TESTS

1.27 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation and (1) described in Chapter 14 of the FSAR, (2) authorized under the provisions of 10 CFR 50.59, or (3) otherwise approved by the Commission.

PRESSURE BOUNDARY LEAKAGE

1.28 PRESSURE BOUNDARY LEAKAGE shall be leakage through a nonisolable fault in a reactor coolant system component body, pipe wall, or vessel wall.

PRIMARY CONTAINMENT INTEGRITY

1.29 PRIMARY CONTAINMENT INTEGRITY shall exist when:

a. All primary containment penetrations required to be closed during accident conditions are either:

1. Capable of being closed by an OPERABLE primary containment automatic isolation system, or

SPECIFICATION 5.5
(Also see Specification 3.0)

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval. For the purpose of the sixth refueling outage, those Surveillance Requirements listed on Table 4.0.2-1 and 4.0.2-2 are extended to the date specified in the table.

see Specification 3.0

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

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

5.5.6 ~~4.0.5~~ Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, & 3 components shall be applicable as follows: (B)

~~a.~~ ~~Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).~~ (LA.1)

5.5.6.a ~~b.~~ Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the subsystem by:

5.5.7.a 5.5.7.b ~~1.~~ Verifying that the subsystem satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% and uses the test procedure guidance in ~~Regulatory Positions C.5.a, C.5.c, and C.5.d of~~ Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 3800 cfm ± 10%. (LA.3)

5.5.7.c ~~2.~~ Verifying ~~within 31 days~~ after removal that a laboratory analysis of a representative carbon sample obtained in ~~accordance with Regulatory Position C.6.b of~~ Regulatory Guide 1.52, Revision 2, March 1978, shows a methyl iodide penetration of less then 0.100% when tested at a temperature of 30°C and at a relative humidity of 70% in accordance with ASTM D3803-1989 ~~with a 6 inch bed;~~ and (LA.3) (A)

5.5.7.a ~~3.~~ Verifying a subsystem flow rate of 3800 cfm ± 10% during system operation when tested in accordance with ANSI N510-1980.

5.5.7.c ~~c.~~ After every 720 hours of charcoal adsorber operation by verifying ~~within 31 days~~ after removal that a laboratory analysis of a representative carbon sample obtained ~~in accordance with Regulatory Position C.6.b of~~ Regulatory Guide 1.52, Revision 2, March 1978, shows a methyl iodide penetration of less than 0.100% when tested at a temperature of 30°C and at a relative humidity of 70% in accordance with ASTM D3803-1989 ~~with a 6 inch bed.~~ (LA.3)

~~d.~~ At least once per 18 months by:

5.5.7.d ~~1.~~ Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 11.0 inches water gauge while operating the filter train at a flow rate of 3800 cfm ± 10%.

(See Specification 3.6.4.3) ~~2.~~ Verifying that the filter train starts and isolation dampers open on each of the following test signals:

(See Specification 3.3.6.2) a) Manual initiation from the control room, and

b) Simulated automatic initiation signal.

5.5.7.e ~~3.~~ Verifying that the heaters dissipate at least 24 kW when tested in accordance with ANSI N510-1980.

(See Specification 3.6.4.3) ~~4.~~ Verifying that the filter cooling bypass dampers can be remote manually opened and the fan can be remote manually started. (1.7)

ADD: SR 3.0.2 & SR 3.0.3 ARE APPLICABLE

SPECIFICATION 5.5
(Also see Specification 3.5.1)
(Also see Specification 3.7.2)

PLANT SYSTEMS

EMERGENCY EQUIPMENT COOLING WATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 Two independent emergency equipment cooling water (EECW) system subsystems shall be OPERABLE with each subsystem comprised of:

(See Specification 3.7.2)

a. One OPERABLE EECW pump, and

b. An OPERABLE flow path capable of removing heat from the associated safety-related equipment.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, 4, and 5.

ACTION:

a. In OPERATIONAL CONDITION 1, 2 or 3, with one EECW system subsystem inoperable:

1. Within 2 hours: (LA.4)

a) Verify that all required systems, subsystems, trains, components and devices that depend upon the remaining OPERABLE EECW system subsystem are also OPERABLE, and

(See Specification 3.5.1)

b) Verify that the ADS* is OPERABLE.

Otherwise**, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

2. Declare the associated safety-related equipment inoperable and take the ACTIONS required by the applicable Specifications.

(See Specification 3.7.2)

3. Restore the inoperable EECW system subsystem to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

b. In OPERATIONAL CONDITION 4 or 5, determine the OPERABILITY of the safety-related equipment associated with an inoperable EECW system subsystem and take any ACTIONS required by the applicable Specifications.

(See Specification 3.5.1)

*ADS is not required to be OPERABLE when reactor steam dome pressure is less than or equal to 150 PSIG. (LA.4)

**Except for an inoperable Drywell Cooling Unit, required by Specification 3.7.11 or an inoperable primary containment oxygen monitoring instrumentation channel, required by Specification 3.3.7.5, that depends on the remaining OPERABLE EECW system subsystem. In these cases, take the ACTION required by Specification 3.7.11 for the inoperability of both required Drywell Cooling Units or Specification 3.3.7.5 for the inoperability of both required primary containment oxygen monitoring instrumentation channels.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

~~f. DELETED~~ (A.1)

5.5.12 ~~5.~~ Primary Containment Leakage Rate Testing Program

5.5.12.a 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.

5.5.12.b The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 56.5 psig.

5.5.12.c The maximum allowable primary containment leakage rate, L_a, shall be 0.5% of primary containment air weight per day at P_a.

5.5.12.e The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

5.5.12.f The provisions of Specification 4.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

(LA.10)

~~h.~~ Configuration Risk Management Program

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 allowed-outage-time has been granted (Specification 3.8.1.1.b.2). The program shall include the following elements:

~~1.~~ Provisions for 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.

~~2.~~ Provisions for performing an assessment prior to entering the LCO ACTION STATEMENT for preplanned activities.

~~3.~~ Provisions for performing an assessment after entering the LCO ACTION STATEMENT for unplanned entry into the LCO ACTION STATEMENT.

~~4.~~ Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO ACTION STATEMENT.

RAI 5.5.14

SPECIFICATION 5.5

(Also see Specification 5.2)
(Also see Specification 5.6)

PROCEDURES AND PROGRAMS (Continued)

LA.10

RAI 5.5.14

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

6.8.6 Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

(See Specification 5.2)

Any deviation from the working hour guidelines shall be authorized in advance by the Plant Manager or his designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or his designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized.

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 Regional Administrator of the Regional Office of the NRC unless otherwise noted.

(See Specification 5.6)

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 unit.

6.9.1.2 The startup report shall address each of the tests identified in Subsection 14.1.4.8 of the Final Safety Analysis Report 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

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

~~6.14.1 The ODCM shall be approved by the Commission prior to implementation.~~ (A.8)

5.5.1.b ~~6.14.2~~ Changes to the ODCM:

5.5.1.b.1 ~~a.~~ Shall be documented and records of reviews performed shall be retained. This documentation shall contain: (A)

i ~~1)~~ Sufficient information to support the change together with the appropriate analyses or evaluations justifying the changes(s) and

ii ~~2)~~ A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

5.5.1.b.2 ~~b.~~ Shall become effective after approval of the Plant Manager. (A)

5.5.1.b.3 ~~c.~~ Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented. (A)

⟨Add: ITS 5.5.11, Safety Function Determination Program⟩ (A.9)

⟨Add: ITS 5.5.10, Bases Control Program⟩ (M.1)

DISCUSSION OF CHANGES
ITS: SECTION 5.5 - PROGRAMS AND MANUALS

ADMINISTRATIVE

A.1 In the conversion of the Fermi 2 current Technical Specifications (CTS) to the proposed plant specific Improved Technical Specifications (ITS), certain wording preferences or conventions are adopted which do not result in technical changes (either actual or interpretational). Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications NUREG-1433, Rev. 1.

A.2 Not used. (B)

A.3 CTS 4.0.5.d states that the performance of inservice testing and inspection activities shall be in addition to other surveillance requirements. This CTS statement prevents the misinterpretation that the CTS 4.0.5 requirements were in place of other surveillances. The structure and application of ITS does not require this statement. It is clear from the Use and Application section of ITS that these activities do not replace other SR's. Therefore, this is an administrative change with no impact on safety.

A.4 CTS 4.0.5.b and ITS 5.5.6.a contain a table translating the calendar terms of the ASME Code to a frequency given in terms of days. The ITS table includes a translation for the Code term "Biennially or every 2 years." The CTS does not include this translation. The ITS translation of "Biennially or every 2 years" to be equivalent to 731 days is consistent with standard industry practice and NUREG 1433, Revision 1. 731 days also corresponds to the maximum number of days two consecutive years may contain, given only one can be a leap year. Therefore, this is an administrative change with no impact on safety.

A.9 ITS 5.5.11, Safety Function Determination Program provides guidance regarding the appropriate Actions to be taken when an inoperability (i.e., a support system) also results in the inoperability of one or more related systems (i.e., supported system(s)) and the actions of the supported system are not taken, as allowed by ITS LCO 3.0.6. The ITS 5.5.11 program, along with ITS LCO 3.0.6, is intended to resolve inconsistencies and ambiguities associated with inoperabilities in support/supported systems. Refer to discussions in Section 1.0 regarding incorporation of ITS LCO 3.0.6 for additional details.

The BWR STS, NUREG-1433, Rev. 1, was developed, with the Industry input and approval of the NRC, to include LCO 3.0.6, and a new program, Specification 5.5.11, Safety Function Determination Program to resolve the application of LCOs to support and supported systems. Since the function of ITS 5.5.11 and LCO 3.0.6 is to clarify existing ambiguities and to maintain actions consistent with previous interpretations, this is an administrative change with no impact on safety.

RAI-2

A.10 CTS Bases for Specification 3.11.1.4 provide a detailed description of "outside temporary tank." ITS 5.5.8.b includes these details within the body of the Specification. This change does not result in any technical changes (either actual or interpretational), and is therefore considered an editorial presentation preference. Therefore this change is an administrative change with no impact on safety.

A.11 CTS 6.8.5 contains a list of functional systems that could have primary coolant sources outside of containment. This list contains generic system names that are being replaced with more specific Fermi-2 nomenclature. The system names provided in ITS 5.5.2 are those used in the procedures that implement this CTS requirement. Therefore, this change is administrative only.

RAIs 5.5.14

A.12 Not used.

DISCUSSION OF CHANGES
ITS: SECTION 5.5 - PROGRAMS AND MANUALS

TECHNICAL CHANGES - MORE RESTRICTIVE

M.1 ITS 5.5.10, TS Bases Control Program, is provided to specifically delineate the appropriate methods and reviews necessary for a change to the Technical Specification Bases. The method of control of the CTS Bases is undefined. Therefore, the addition of this program represents a more restrictive change with no impact on safety.

TECHNICAL CHANGES - LESS RESTRICTIVE
"Generic"

LA.1 CTS 4.0.5.a provides references to specific 10 CFR 50 and ASME Code requirements governing performance of the Inservice Inspection (ISI) Program. The references are duplicated in 10 CFR 50.55a, which requires the implementation of ASME, Section XI and applicable addenda, for inservice inspection of ASME Code Class 1, 2, and 3 components. These specific references are relocated from the CTS and are maintained in the ISI Program. As stated above, these requirements are specified in 10 CFR 50.55a, and therefore, cannot be changed by Detroit Edison, without prior approval from the NRC. This provides an equivalent level of regulatory control. Therefore, this change is a less restrictive administrative change, which has no impact on safety.

RAI 0.0-1

LA.2 CTS 4.0.5.f includes requirements for an inservice inspection program for piping identified in Generic Letter 88-01, "NRC Position On IGSCC in BWR Austenitic Stainless Steel Piping." CTS 4.0.5 requires that this program be in accordance with the NRC staff positions on schedule, methods, personnel, and sample expansion. Fermi 2 has committed to the NRC to implement the requirements of Generic Letter 88-01. This program is included in the ISI-NDE Program required by 10 CFR 50.55a and performed in accordance with ASME Section XI. Therefore, the inservice inspection program for piping in CTS 4.0.5.f is in the plant controlled ISI-NDE Program and is not repeated in the ITS. This is a less restrictive administrative change but it is acceptable because the regulations and Fermi 2 commitments to the NRC contain all necessary programmatic requirements for the ISI-NDE without repeating them in the ITS. Changes to the ISI-NDE Program are controlled in accordance with 10 CFR 50.55a. This relocation continues to provide adequate protection of the public health and safety because the ISI-NDE program of Generic Letter 88-01 will continue to be required by the ISI-NDE program.

LA.3 CTS 4.6.5.3 and CTS 4.7.2.1 require surveillance tests to be performed and also detail the methods for implementing ventilation filter testing requirements for the Standby Gas Treatment (SGT) System and Control Room Emergency Filtration (CREF) System. ITS 5.5.7 require surveillance test to be performed, but do not detail the methods for performing the test. This is acceptable because the CTS details do not impact the requirement to perform the surveillance test. Therefore, these details will be adequately controlled in the UFSAR, which requires revisions to be controlled by 10 CFR 50.59. This relocation continues to provide adequate protection of the public health and safety since there is no change in the requirement to perform the surveillance tests. | RAI 0.0-1

LA.4 CTS 3.7.1.2 Action a.1 requires confirmatory actions to be completed within 2 hours if a single Emergency Equipment Cooling Water (EECW) subsystem is inoperable. This confirmatory action is related to determining that equipment on the opposite division of the division affected by the loss of EECW is Operable. If an opposite division component is inoperable then a prompt shutdown is required since a loss of a safety function is likely to have occurred. These actions are not explicitly required in the ITS, but are conceptually relocated to ITS LCO 3.0.6 and the Safety Function Determination Program required by ITS 5.5.11, which are provided to determine if a loss of a safety function has occurred and to require the correct action to take in this event. The level of safety of facility operation is unaffected by the change and this relocation continues to provide adequate protection of the public health and safety since the requirement to determine if loss of a safety function has occurred and take appropriate action continues to be required by the Technical Specifications. | RAI 0.0-1

LA.5 CTS 4.8.1.1.2.c and CTS 4.8.1.1.2.d require surveillance tests to be performed and also detail the standards and methods for implementing diesel fuel oil testing requirements. ITS 5.5.9 require the tests to be performed, but do not detail the specific standards and methods for performing the tests beyond the general statement of the use of ASTM standards and the use of ASTM type 2D fuel oil. These details are relocated to the Bases. This is acceptable because relocation of the details to the Bases for ITS SR 3.8.3.3 do not impact the requirement to perform the surveillance test or the appropriate acceptance criteria. Therefore, these details will be adequately controlled by the ITS Bases, which require change control in accordance with ITS 5.5.10, Bases Control Program. This relocation continues to provide | RAI 0.0-1

adequate protection of the public health and safety since there is no change in the required frequency or acceptance criteria of these tests.

LA.6 CTS 3/4.11.1.4 requires maintaining the quantity of radioactive material contained in any outside temporary tanks within limits and provides specific Actions and Surveillance Requirements for maintaining this limit. ITS 5.5.8 requires the quantity to be maintained within limits, and requires an appropriate surveillance program to ensure the limits are maintained, but relocates the specific Actions and Surveillance Requirements. These requirements are relocated to the Technical Requirements Manual, which requires changes to be controlled by the provisions of 10 CFR 50.59. This is a more appropriate level of regulatory control. This relocation continues to provide adequate protection of the public health and safety since there is no change in the requirement to maintain the quantity of radioactive material within the required limits and the requirements for appropriate surveillances and actions.

LA.7 CTS 3.11.2.6 establishes a maximum limit of 4% by volume for the hydrogen concentration in the main condenser offgas treatment system with actions to be taken if the limit is exceeded. In addition, CTS 4.11.2.6 establishes a requirement for the continuous monitoring of the hydrogen concentration in the main condenser offgas treatment system to ensure that the specified limit is maintained. ITS 5.5.8.a requires the 4% limit and that a surveillance program be established to ensure that the limit is maintained. The action requirements for exceeding the limit for the hydrogen concentration and the specifics of the surveillance program for ensuring the limit is maintained are relocated to the Technical Requirements Manual, which requires changes to be controlled by the provisions of 10 CFR 50.59. This is a more appropriate level of regulatory control. This relocation continues to provide adequate protection of the public health and safety since there is no change in the requirement to maintain hydrogen concentration within the required limit and the requirements for appropriate surveillances and actions.

LA.8 CTS 5.7.1 requires components to be maintained within the cyclic or transient limits defined in CTS Table 5.7.1-1. ITS 5.5.5 requires that the components be maintained within the cyclic or transient limits, but does not define the specific limits or the specific components. This is acceptable because these design details do not impact the ITS requirement to maintain the components within their limits. Therefore, these design details will be relocated to the UFSAR which requires change control in accordance with 10 CFR 50.59. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. This relocation continues to provide adequate protection of the public health and safety since there is no change in the requirement to maintain the components within their cyclic or transient limits.

RAI 0.0-1

LA.9 Not used.

LA.10 CTS 6.8.5.g requires the Configuration Risk Management Program (CRMP). This Program is relocated to the Technical Requirements Manual (TRM), which requires changes to be controlled by the provisions of 10 CFR 50.59. NRC SERs issuing risk-informed Completion Times will continue to require assessments in accordance with the CRMP, and Technical Specifications will continue to prescribe the necessary required actions for discovered inoperabilities. This relocation continues to provide adequate protection of the public health and safety since there is no change in the requirement to perform assessments in accordance with the CRMP, and the requirements for appropriate actions remain in the Technical Specifications.

RAI 0.0-1 (A)

LR.1 CTS 4.6.1.1.a, 3.6.1.2.b, 3.6.1.2 Action b, 3.6.1.2 footnotes * and **, 4.6.1.3.a, 4.6.1.3.b, 4.6.1.3.c.1 and 2, 4.6.1.5.1, and 4.6.1.5.2 provide details of containment leak rate testing frequencies, exceptions and exemptions, inspections. These details are adequately addressed within ITS 5.5.12, "Containment Leakage Rate Testing Program," which requires compliance with 10 CFR 50, Appendix J, Option B, as modified by approved exemptions, and which requires compliance with the guidelines of Regulatory Guide 1.163, "Performance Based Containment Leak Test Program." Any revisions to these requirements requires change control in accordance with 10 CFR 50.92 or in accordance with the requirements of 10 CFR 50, Appendix J, Option B. Furthermore, reporting details are removed from Technical Specifications since the reporting requirements of 10 CFR 50.73 are adequate to assure the proper and prompt reporting. Therefore, since there is no change in the technical requirements, and future revisions must also be made by Technical Specification amendment request or exemption to the regulations, the removal of these details continues to provide adequate protection of the public health and safety.

(A)

RAI 0.0-1

TECHNICAL CHANGES - LESS RESTRICTIVE

"Specific"

None

RELOCATED SPECIFICATIONS

None

5.5 Programs and Manuals (continued) <CTS>

5.5.~~6~~ Inservice Testing Program And Inspection

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components ~~including applicable supports~~. The program shall include the following:

a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda are as follows: <4.0.5.b>

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities; <4.0.5.c>

c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and <DOC A.5>

d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS. <4.0.5.e>

5.5.~~7~~ Ventilation Filter Testing Program (VFTP)

~~A program shall be established to implement the following required testing of Engineered Safety Feature (ESF) filter ventilation systems at the frequencies specified in [Regulatory Guide], and in accordance with [Regulatory Guide 1.52, Revision 2, ASME N510-1989, and AG-1].~~

Insert 5.5-2

(continued)

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5.5.~~8~~7 Ventilation Filter Testing Program (VFTP) (continued)

Insert 5.5-2A (P.4)

a. Demonstrate for each of the ESF systems that an inplace test of the HEPA filters shows a penetration and system bypass < ~~[0.05]%~~ when tested in accordance with ~~[~~Regulatory Guide 1.52, Revision 2, and ASME N510-1989~~]~~ at the system flowrate specified below ~~[+/- 10%]~~.

specified below

~~ESF Ventilation System~~	~~Flowrate~~
Insert 5.5-3 (P.1)	

<4.6.5.3.b.1>
<4.6.5.3.b.3>
<4.6.5.3.e>
<4.7.2.1.c.1>
<4.7.2.1.c.3>
<4.7.2.1.f>

Insert 5.5-2A (P.4)

b. Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < ~~[0.05]%~~ when tested in accordance with ~~[~~Regulatory Guide 1.52, Revision 2, and ASME N510-1989~~]~~ at the system flowrate specified below ~~[+/- 10%]~~.

specified below

~~ESF Ventilation System~~	~~Flowrate~~
Insert 5.5-3 (P.1)	

<4.6.5.3.b.1>
<4.6.5.3.f>
<4.7.2.1.c.1>
<4.7.2.1.g>

Insert 5.5-2B (P.4)

c. Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in ~~[~~Regulatory Guide 1.52, Revision 2~~]~~, shows the methyl iodide penetration less than the value specified below when tested in accordance with ~~[~~ASTM D3803-1989~~]~~ at a temperature of ~~[~~30°C~~]~~ and ~~greater than or equal to~~ at (A) the relative humidity specified below.

~~ESF Ventilation System~~	~~Penetration~~	~~RH~~
Insert 5.5-4 (P.1)		

<4.6.5.3.b.2>
<4.6.5.3.c>
<4.7.2.1.c.2>
<4.7.2.1.d>

(continued)

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5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

~~Reviewer's Note: Allowable penetration = [100% - methyl iodide efficiency for charcoal credited in staff safety evaluation]/ (safety factor).~~

~~Safety factor = [5] for systems with heaters.~~
~~= [7] for systems without heaters.~~

d. Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers is less than the value specified below when tested in accordance with [Regulatory Guide 1.52, Revision 2, and ASME N510-1989] at the system flowrate specified as follows [± 10%]:

(CREF)

HA

P.4 Insert 5.5-2C

<4.6.5.3.d.1>

~~ESF Ventilation System~~	~~Delta P~~	~~Flowrate~~

<4.7.2.1.e.1>

P.1 Insert 5.5-5

P.4 Insert 5.5-2C

e. Demonstrate that the heaters for each of the ESF system dissipate the value specified below ~~[± 10%]~~ when tested in accordance with ~~[~~ASME N510-1989~~]~~:

~~ESF Ventilation System~~	~~Wattage~~

<4.6.5.3.d.3>
<4.7.2.1.e.4>

P.1 Insert 5.5-6

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

<DOC A.7>

5.5.8 Explosive Gas and Storage Tank Radioactivity Monitoring Program

<3.11.2.6>

This program provides controls for potentially explosive gas mixtures contained in the [Waste Gas Holdup System], [the quantity of radioactivity contained in gas storage tanks or fed into the offgas treatment system, and the quantity of radioactivity contained in ~~unprotected~~ outdoor ~~liquid~~ storage tanks]. ~~The~~

Main Condenser

temporary

<3.11.1.4>

(continued)

REV 9

Insert 5.5-2C

The following tests shall be performed once per 18 months.

Insert 5.5-5

ESF Ventilation System	Delta P (inches water gauge)	Flowrate (cfm)
Standby Gas Treatment	11.0	3800
Control Room Emergency Filtration (CREF)	6.0 (makeup train) 8.0 (recirculation train)	1800 3000

(A)

Insert 5.5-6

ESF Ventilation System	Wattage (kW)
Standby Gas Treatment	≥ 24
Control Room Emergency Makeup Inlet Air	12.0 ± 2.0

5.5 Programs and Manuals <CTS>

5.5.~~12~~ 11 Safety Function Determination Program (SFDP) (continued) <DOC A.9>

~~2.~~ 2. A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable; or

~~3.~~ 3. A required system redundant to support system(s) for the supported systems (a) and (b) above is also inoperable.

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

(P.1) Insert 5.5-9 <6.8.5.g>

(P.1) Insert 5.5-10 <6.8.5.d>

RAI 5.5-14

REV 9

Insert 5.5-11

RAI 5.5.14

<< Removed in Rev 8 >>

JUSTIFICATION FOR DIFFERENCES FROM NUREG - 1433
ITS: SECTION 5.5 - PROGRAMS AND MANUALS

NON-BRACKETED PLANT SPECIFIC CHANGES

P.1 These changes are made to NUREG-1433 to reflect Fermi 2 current licensing basis; including design features, existing license requirements and commitments. Additional rewording, reformatting, and revised numbering is made to incorporate these changes consistent with Writer's Guide conventions. Refer to CTS Discussion Of Changes to the related requirement for a detailed justification of changes made to the current licensing basis which are also reflected in the ITS as presented.

P.2 Not used.

P.3 Not used.

P.4 Vent lation Filter Testing Program, is modified to include a det d description of the required SR Frequencies to improve cla. y and to facilitate use by the plant staff. This change pr des additional detail and is intended to improve clarity and ensu e the requirement is fully understood and consistently applied. There are no technical changes to requirements as specified in NUREG 1433, Revision 1; therefore, this change is not a significant or generic deviation from NUREG-1433.

P.5 Change made for editorial preference or clarity. For example, Fermi-2 CTS addresses only single-unit reporting requirements. Therefore the NUREG-1433 wording applicable to dual-unit sites is eliminated.

GENERIC CHANGES

C.1 TSTF-106: NRC approved change to NUREG-1433.

C.2 TSTF-118: NRC approved change to NUREG-1433.

C.3 TSTF-279: NRC approved change to NUREG-1433. (B)

DISCUSSION OF CHANGES
ITS: SECTION 5.6 - REPORTING REQUIREMENTS

TECHNICAL CHANGES - MORE RESTRICTIVE

None

TECHNICAL CHANGES - LESS RESTRICTIVE
"Generic"

LA.1 CTS 6.9.1.1, 6.9.1.2, and 6.9.1.3 detail specific reporting requirements for the Startup Report. This requirement is being relocated to the TRM, which requires revisions to be controlled by 10 CFR 50.59. The startup report provides the NRC a means to review the appropriateness of licensee activities after-the-fact, but provides no regulatory authority or approval. This detail is not required by 10 CFR 50.36 for inclusion into the Administrative Controls section of the TS. Since the report performs no compensatory or mitigative functions the Technical Specification requirement for its submittal is not required to ensure adequate protection of the public health and safety. The relocation of this information maintains the consistency with NUREG-1433.

LR.1 CTS 6.9.1.5.c and 6.9.1.5.d require submission of reports covering ECCS outage data and results of primary coolant specific activity analyses when it has exceed its limit. ITS does not contain this requirement. The requirements for submission of these reports are removed from Technical Specifications. These reports involve no regulatory authority or approval. This Technical Specification detail is not required by 10 CFR 50.36 for inclusion into the Administrative Controls Section. Regulatory control of changes to these requirements (e.g., Technical Specification amendment or 10 CFR 50.59) is not necessary to provide adequate protection of the public health and safety since the reports perform no compensatory or mitigative functions and are not required to ensure adequate protection of the public health and safety. For fuel cladding failures that exceed the reporting guidelines of 10 CFR 50.73, appropriate reporting is required. The removal of this information maintains the consistency with NUREG-1433.

RAI-3/RAI-4

INSERT THIS PAGE IN FRONT OF VOLUME 11

Volume 11: CTS MARKUP COMPILATION	
Remove	**Replace**
1-4 (5.5 CTS M/U) pg 1 of 24	1-4 (5.5 CTS M/U) pg 1 of 24 Rev 9
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SPECIFICATION 5.5
(Also see Specification 1.0)

(A.1)

DEFINITIONS

MINIMUM CRITICAL POWER RATIO

1.22 The MINIMUM CRITICAL POWER RATIO (MCPR) shall be the smallest CPR which exists in the core.

see Specification 1.0

OFF-GAS TREATMENT SYSTEM

1.23 An OFF-GAS TREATMENT SYSTEM is any system designed and installed to reduce radioactive gaseous effluents by collecting reactor coolant system offgases from the reactor coolant and providing for delay or holdup for the purpose of reducing the total radioactivity prior to release to the environment.

OFFSITE DOSE CALCULATION MANUAL

5.5.1.a.1 ~~1.24~~ 5.5.1.a.2 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls required by Section 6.8.5 and Radiological Environmental Monitoring Programs and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Specifications 6.9.1.7 and 6.9.1.8.

(A)

OPERABLE - OPERABILITY

1.25 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s) and when all necessary attendant instrumentation, controls, electrical power, 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).

OPERATIONAL CONDITION - CONDITION

1.26 An OPERATIONAL CONDITION, i.e., CONDITION, shall be any one inclusive combination of mode switch position and average reactor coolant temperature as specified in Table 1.2.

see Specification 1.0

PHYSICS TESTS

1.27 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation and (1) described in Chapter 14 of the FSAR, (2) authorized under the provisions of 10 CFR 50.59, or (3) otherwise approved by the Commission.

PRESSURE BOUNDARY LEAKAGE

1.28 PRESSURE BOUNDARY LEAKAGE shall be leakage through a nonisolable fault in a reactor coolant system component body, pipe wall, or vessel wall.

PRIMARY CONTAINMENT INTEGRITY

1.29 PRIMARY CONTAINMENT INTEGRITY shall exist when:

a. All primary containment penetrations required to be closed during accident conditions are either:

1. Capable of being closed by an OPERABLE primary containment automatic isolation system, or

INSERT 3.0-4

When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

Exceptions to this Specification are stated in the individual Specifications.

RAI-1

LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

INSERT 3.0-5

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

SPECIFICATION 5.5
(Also see Specification 3.0)

APPLICABILITY

SURVEILLANCE REQUIREMENTS

4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.

4.0.2 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval. For the purpose of the sixth refueling outage, those Surveillance Requirements listed on Table 4.0.2-1 and 4.0.2-2 are extended to the date specified in the table.

see Specification 3.0

4.0.3 Failure to perform a Surveillance Requirement within the allowed surveillance interval, defined by Specification 4.0.2, shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. Surveillance Requirements do not have to be performed on inoperable equipment.

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

5.5.6 ~~4.0.5~~ Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, & 3 components shall be applicable as follows: (B)

~~a.~~ ~~Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).~~ (LA.1)

5.5.6.a ~~b.~~ Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

SPECIFICATION 5.5
(Also see Specification 3.3.6.2)
(Also See Specification 3.6.4.3)

CONTAINMENT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

b. At least once per 18 months or (1) after any structural maintenance on the HEPA filter or charcoal adsorber housings, or (2) following painting, fire or chemical release in any ventilation zone communicating with the subsystem by:

5.5.7.a 5.5.7.b ~~1.~~ Verifying that the subsystem satisfies the in-place penetration and bypass leakage testing acceptance criteria of less than 0.05% and uses the test procedure guidance in ~~Regulatory Positions C.5.a, C.5.c, and C.5.d of~~ Regulatory Guide 1.52, Revision 2, March 1978, and the system flow rate is 3800 cfm ± 10%. (LA.3)

5.5.7.c ~~2.~~ Verifying ~~within 31 days~~ after removal that a laboratory analysis of a representative carbon sample obtained in ~~accordance with Regulatory Position C.6.b of~~ Regulatory Guide 1.52, Revision 2, March 1978, shows a methyl iodide penetration of less then 0.100% when tested at a temperature of 30°C and at a relative humidity of 70% in accordance with ASTM D3803-1989 ~~with a 6 inch bed;~~ and (LA.3) (A)

5.5.7.a ~~3.~~ Verifying a subsystem flow rate of 3800 cfm ± 10% during system operation when tested in accordance with ANSI N510-1980.

5.5.7.c ~~c.~~ After every 720 hours of charcoal adsorber operation by verifying ~~within 31 days~~ after removal that a laboratory analysis of a representative carbon sample obtained ~~in accordance with Regulatory Position C.6.b of~~ Regulatory Guide 1.52, Revision 2, March 1978, shows a methyl iodide penetration of less than 0.100% when tested at a temperature of 30°C and at a relative humidity of 70% in accordance with ASTM D3803-1989 ~~with a 6 inch bed.~~ (LA.3)

~~d.~~ At least once per 18 months by:

5.5.7.d ~~1.~~ Verifying that the pressure drop across the combined HEPA filters and charcoal adsorber banks is less than 11.0 inches water gauge while operating the filter train at a flow rate of 3800 cfm ± 10%.

(See Specification 3.6.4.3) ~~2.~~ Verifying that the filter train starts and isolation dampers open on each of the following test signals:

a) Manual initiation from the control room, and

(See Specification 3.3.6.2) b) Simulated automatic initiation signal.

5.5.7.e ~~3.~~ Verifying that the heaters dissipate at least 24 kW when tested in accordance with ANSI N510-1980.

(See Specification 3.6.4.3) 4. Verifying that the filter cooling bypass dampers can be remote manually opened and the fan can be remote manually started. (A.7)

ADD: SR 3.0.2 & SR 3.0.3 ARE APPLICABLE

SPECIFICATION 5.5
(Also See Specification 3.5.1)
(Also See Specification 3.7.2)

PLANT SYSTEMS

EMERGENCY EQUIPMENT COOLING WATER SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.1.2 Two independent emergency equipment cooling water (EECW) system subsystems shall be OPERABLE with each subsystem comprised of:

See Specification 3.7.2

a. One OPERABLE EECW pump, and

b. An OPERABLE flow path capable of removing heat from the associated safety-related equipment.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3, 4, and 5.

ACTION:

a. In OPERATIONAL CONDITION 1, 2 or 3, with one EECW system subsystem inoperable:

LA.4

1. Within 2 hours:

a) Verify that all required systems, subsystems, trains, components and devices that depend upon the remaining OPERABLE EECW system subsystem are also OPERABLE, and

See Specification 3.5.1

b) Verify that the ADS* is OPERABLE.

Otherwise**, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

2. Declare the associated safety-related equipment inoperable and take the ACTIONS required by the applicable Specifications.

See Specification 3.7.2

3. Restore the inoperable EECW system subsystem to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

b. In OPERATIONAL CONDITION 4 or 5, determine the OPERABILITY of the safety-related equipment associated with an inoperable EECW system subsystem and take any ACTIONS required by the applicable Specifications.

See Specification 3.5.1

*ADS is not required to be OPERABLE when reactor steam dome pressure is less than or equal to 150 PSIG.

LA.4

**Except for an inoperable Drywell Cooling Unit, required by Specification 3.7.11 or an inoperable primary containment oxygen monitoring instrumentation channel, required by Specification 3.3.7.5, that depends on the remaining OPERABLE EECW system subsystem. In these cases, take the ACTION required by Specification 3.7.11 for the inoperability of both required Drywell Cooling Units or Specification 3.3.7.5 for the inoperability of both required primary containment oxygen monitoring instrumentation channels.

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

~~f. DELETED~~ (A.1)

5.5.12 ~~g.~~ Primary Containment Leakage Rate Testing Program

5.5.12.a 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.

5.5.12.b The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 56.5 psig.

5.5.12.c The maximum allowable primary containment leakage rate, L_a, shall be 0.5% of primary containment air weight per day at P_a.

5.5.12.e The provisions of Specification 4.0.2 do not apply to the test frequencies specified in the Primary Containment Leakage Rate Testing Program.

5.5.12.f The provisions of Specification 4.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

(LA.10)

~~h.~~ Configuration Risk Management Program

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 allowed-outage-time has been granted (Specification 3.8.1.1.b.2). The program shall include the following elements:

~~1.~~ Provisions for 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.

2. Provisions for performing an assessment prior to entering the LCO ACTION STATEMENT for preplanned activities.

~~3.~~ Provisions for performing an assessment after entering the LCO ACTION STATEMENT for unplanned entry into the LCO ACTION STATEMENT.

~~4.~~ Provisions for assessing the need for additional actions after the discovery of additional equipment out of service conditions while in the LCO ACTION STATEMENT.

RAI 5.5.14

SPECIFICATION 5.5

(Also see Specification 5.2)
(Also see Specification 5.6)

PROCEDURES AND PROGRAMS (Continued)

LA.10

RAI 5.5.14

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

6.8.6 Administrative controls shall be developed and implemented to limit the working hours of personnel who perform safety-related functions (e.g., senior reactor operators, reactor operators, auxiliary operators, health physicists, and key maintenance personnel). The controls shall include guidelines on working hours that ensure that adequate shift coverage is maintained without routine heavy use of overtime for individuals.

(See specification 5.2)

Any deviation from the working hour guidelines shall be authorized in advance by the Plant Manager or his designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or his designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines shall not be authorized.

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 Regional Administrator of the Regional Office of the NRC unless otherwise noted.

(see specification 5.6)

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 unit.

6.9.1.2 The startup report shall address each of the tests identified in Subsection 14.1.4.8 of the Final Safety Analysis Report 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

5.14 OFFSITE DOSE CALCULATION MANUAL (ODCM) (A.8)

~~6.14.1 The ODCM shall be approved by the Commission prior to implementation.~~

5.5.1.b ~~6.14.2~~ Changes to the ODCM:

5.5.1.b.1 ~~a.~~ Shall be documented and records of reviews performed shall be retained. This documentation shall contain: (A)

i ~~1)~~ Sufficient information to support the change together with the appropriate analyses or evaluations justifying the changes(s) and

ii ~~2)~~ A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations. (A)

5.5.1.b.2 ~~b.~~ Shall become effective after approval of the Plant Manager.

5.5.1.b.3 ~~c.~~ Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

⟨Add: ITS 5.5.11, Safety Function Determination Program⟩ (A.9)

⟨Add: ITS 5.5.10, Bases Control Program⟩ (M.1)

INSERT THIS PAGE IN FRONT OF VOLUME 12

Volume 12: IMPROVED TECHNICAL SPECIFICATIONS	
Remove	**Replace**
5.4 ITS pg 5.0-6 Rev 0	5.4 ITS pg 5.0-6 Rev 9
5.5 ITS pg 5.0-11 Rev 0	5.5 ITS pg 5.0-11 Rev 9
5.5 ITS pg 5.0-13 Rev 0	5.5 ITS pg 5.0-13 Rev 9
5.5 ITS pg 5.0-14 Rev 0	5.5 ITS pg 5.0-14 Rev 9
5.5 ITS pg 5.0-15 Rev 0	5.5 ITS pg 5.0-15 Rev 9
5.5 ITS pg 5.0-18 Rev 0	5.5 ITS pg 5.0-18 Rev 9
5.5 ITS pg 5.0-19 Rev 2	5.5 ITS pg 5.0-19 Rev 9

5.0 ADMINISTRATIVE CONTROLS

5.4 Procedures

5.4.1 Written procedures shall be established, implemented, and maintained covering the following activities:

a. The applicable procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978;

b. The emergency operating procedures required to implement the requirements of NUREG-0737 and to NUREG-0737, Supplement 1, as stated in Generic Letter 82-33;

c. Quality assurance for effluent and environmental monitoring;

d. Fire Protection Program implementation; and

e. All programs specified in Specification 5.5.

RAI - VERBAL

5.5 Programs and Manuals (continued)

5.5.5 Component Cyclic or Transient Lim.

This program provides controls to track the UFSAR Section 5.2.1.2 cyclic and transient occurrences to ensure that components are maintained within the design limits.

5.5.6 Inservice Testing and Inspection Program

(B)

These programs provide controls for inservice testing and inspection of ASME Code Class 1, 2, and 3 components. The program shall include the following:

a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda are as follows:

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing and inspection activities	Required Frequencies for performing inservice testing and inspection activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing and inspection activities;

c. The provisions of SR 3.0.3 are applicable to inservice testing and inspection activities; and

d. Nothing in the ASME Boiler and Pressure Vessel Code shall be construed to supersede the requirements of any TS.

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

Demonstrate for each of the ESF systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1980 at the system flowrate specified below ± 10%.

ESF Ventilation System	Flowrate (cfm)	Penetration and System Bypass
Standby Gas Treatment	3800	0.05%
Control Room Emergency Filtration	1800 (makeup filter) 3000 (recirculation filter)	1.0%

c. The following tests shall be performed:

1. Once per 18 months;
2. After 720 hours of system operation;
3. After any structural maintenance on the HEPA filter or charcoal adsorber housing; and
4. Following painting, fire, or chemical release in any ventilation zone communicating with the subsystem while it is in operation.

Demonstrate for each of the ESF systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and at the relative humidity specified below.

ESF Ventilation System	Penetration	RH
Standby Gas Treatment	0.100%	70%
Control Room Emergency Filtration	1.0%	70%

(continued)

5.5 Programs and Manuals

5.5.7 Ventilation Filter Testing Program (VFTP) (continued)

d. The following tests shall be performed once per 18 months.

(A)

Demonstrate for each of the ESF systems that the pressure drop across the combined HEPA filters, the prefilters (CREF only), and the charcoal adsorbers is less than the value specified below when tested in accordance with Regulatory Guide 1.52, Revision 2, and ASME N510-1980 at the system flowrate specified as follows ± 10%:

ESF Ventilation System	Delta P (inches water gauge)	Flowrate (cfm)
Standby Gas Treatment	11.0	3800
Control Room Emergency Filtration (CREF)	6.0 (makeup train) 8.0 (recirculation train)	1800 3000

(A)

e. The following tests shall be performed once per 18 months.

Demonstrate that the heaters for each of the ESF system dissipate the value specified below when tested in accordance with ASME N510-1980:

ESF Ventilation System	Wattage (kW)
Standby Gas Treatment	≥ 24
Control Room Emergency Makeup Inlet Air	12.0 ± 2.0

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies.

(continued)

5.5 Programs and Manuals (continued)

5.5.8 Explosive Gas and Storage Tank Radioactivity Monitoring Program

(A) | This program provides controls for potentially explosive gas mixtures contained in the Main Condenser offgas treatment system, and the quantity of radioactivity contained in temporary outdoor storage tanks.

The program shall include:

(A) | a. A limit of ≤ 4% by volume for concentration of hydrogen in the main condenser offgas treatment system and a surveillance program to ensure the limit is maintained.

b. A surveillance program to ensure that the quantity of radioactivity contained in any outdoor liquid radwaste tank that is not surrounded by liners, dikes, or walls, capable of holding the tank's contents and that does not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system is ≤ 10 curies, excluding tritium and dissolved or entrained noble gases.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas and Storage Tank Radioactivity Monitoring Program surveillance frequencies.

5.5.9 Emergency Diesel Generator Fuel Oil Testing Program

An emergency diesel generator fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. 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. Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:

1. an API gravity or an absolute specific gravity within limits,

2. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and

3. a clear and bright appearance with proper color;

(continued)

5.5 Programs and Manuals

5.5.11 Safety Function Determination Program (SFDP) (continued)

The SFDP identifies where a loss of safety function exists. If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

5.5.12 Primary Containment Leakage Rate Testing Program

a. A program shall be established to implement the leakage rate testing of the primary 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, with the exception of approved exemptions to 10 CFR 50, Appendix J.

b. The peak calculated containment internal pressure for the design basis loss of coolant accident, P_a, is 56.5 psig.

c. The maximum allowable containment leakage rate L_a, at P_a, shall be 0.5% of containment air weight per day.

d. Leakage Rate acceptance criteria are:

1. Containment 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 required Type B and C tests and $\leq 0.75\ L_a$ for Type A tests.

2. Air lock testing acceptance criteria are:

i) Overall air lock leakage rate is $\leq 0.05\ L_a$ when tested at $\geq P_a$.
ii) For each door, leakage rate is ≤ 5 scf per hour when the gap between the door seals is pressurized to $\geq P_a$.

e. The provisions of SR 3.0.2 do not apply to the test frequencies in the Primary Containment Leakage Rate Testing Program.

(continued)

5.5 Programs and Manuals

5.5.12 Primary Containment Leakage Rate Testing Program (continued)

f. The provisions of SR 3.0.3 are applicable to the Primary Containment Leakage Rate Testing Program.

5.5.13 High Density Spent Fuel Racks

A program shall be provided which will assure that any unanticipated degradation of the high density spent fuel racks will be detected and will not compromise the integrity of the racks.

RAIs 5.5.13

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BASES

LCO 3.0.3 (continued)

ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.7, "Spent Fuel Storage Pool Water Level." LCO 3.7.7 has an Applicability of "During movement of irradiated fuel assemblies in the spent fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.7 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.7 of "Suspend movement of irradiated fuel assemblies in the spent fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

a. Unit conditions are such that the requirements of the LCO would not be met in the Applicab desired to be entered; and

b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made