Enclosure Attachment 1 to

PNP 2021-005

Proposed Changes (mark-up) to Palisades Plant

Renewed Facility Operating License DPR-20,

Appendix A Technical Specifications,

and

Appendix B Environmental Protection Plan Pages

ENTERGY NUCLEAR PALISADES, LLC

ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-255

PALISADES NUCLEAR PLANT

RENEWED FACILITY OPERATING LICENSE

Renewed License No. DPR-20

- The Nuclear Regulatory Commission (NRC or the Commission) having previously made the findings set forth in Operating License No. DPR-20, dated February 21, 1991, has now found that:
 - A. The application for Renewed Operating License No. DRP-20 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I, and all required notifications to other agencies or bodies have been duly made;

[deleted];

- B. Construction of the Palisades Plant (the facility) has been completed in conformity with Provisional Construction Permit No. CPPR-25 and the application, as amended, the provisions of the Act, and the regulations of the Commission, and has been operating under facility operating license since February 21, 1991;
- C. Actions have been identified and have been or will be taken with respect to: (1) managing the effects of aging on the functionality of structures and components that have been identified to require review under 10 CFR 54.21(a)(1) during the period of extended operation, and (2) time-limited aging analyses that have been identified to require review under 10 CFR 54.21(c), such that there is reasonable assurance that the activities authorized by this renewed operating license will continue to be conducted in accordance with the current licensing basis, as defined in 10 CFR 54.3 for the facility, and that any changes made to the facility's current licensing basis in order to comply with 10 CFR 54.29(a) are in accordance with the Act and the Commission's regulations;

- D. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
- E. There is reasonable assurance: (i) that the activities authorized by this renewed eperating license can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
- F. Entergy Nuclear Palisades, LLC (ENP) is financially qualified and Entergy Nuclear Operations, Inc. (ENO) is financially and technically qualified to engage in the activities authorized by this renewed operating license in accordance with the Commission's regulations set forth in 10 CFR Chapter I;
- G. ENP and ENO have satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements" of the Commission's regulations;
- H. The issuance of this renewed operating license will not be inimical to the common defense and security or to the health and safety of the public;
- I. After weighing the environmental, economic, technical, and other benefits of the facility against environmental and other costs and considering available alternatives, the issuance of this renewed Facility Operating License No. DPR-20, subject to the conditions for protection of the environment set forth herein, is in accordance with 10 CFR Part 51 (formerly Appendix D to Part 50), of the Commission's regulations and all applicable requirements have been satisfied; and
- J. The receipt, possession, and use of source, byproduct, and special nuclear material as authorized by this renewed operating license will be in accordance with 10 CFR Parts 30, 40, and 70.
- Operating License No. DPR-20, dated February 21, 1991, as amended, was superseded in its entirety by Renewed Facility Operating License No. DPR-20 (previously issued to Consumers Energy Company), is hereby issued to ENP and ENO as follows:
 - A. This renewed license applies to the Palisades Plant, a pressurized light water moderated and cooled reactor and electrical generating equipment (the facility). The facility is located in Van Buren County, Michigan, and is described in the Palisades Plant Updated Final Safety Analysis Report, as supplemented and amended, and in the Palisades Plant Environmental Report, as supplemented and amended.
 - B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses:

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Pursuant to Section 104b of the Act, as amended, and 10 CFR Part 50, "Licensing of Production and Utilization Facilities," (a) ENP to possess and use, and (b) ENO to possess, use and operate, the facility as a utilization facility at the designated location in Van Buren County, Michigan, in accordance with the procedures and limitation set forth in this license: that was used

and are used in the calibration of

(2) ENO, pursuant to the Act and 10 CFR Parts 40 and 70, to receive, possess, and use source and special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Updated Final Safety Analysis Report, as supplemented and amended;

(3)sealed sources that were used for

ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use byproduct, source, and special nuclear material as sealed sources for reactor startus, reactor instrumentation, radiation monitoring equipment calibration, and fission detectors in amounts as required;

(4)ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material for sample analysis or instrument calibration, or associated with radioactive apparatus or components; and

that were used as

- ENO, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not (5) separate, such byproduct and special nuclear materials as may be produced by the operations of the facility. that were
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations in 10 CFR Chapter I and is subject to all applicable provisions of the Act; to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

[deleted]

- ENO is authorized to operate the facility at steady-state reactor core power levels not in excess of 2565.4 Megawatts thermal (100 percent rated power) in accordance with the conditions specified herein. XXX
 - The Technical Specifications contained in Appendix A, as revised through (2)Amendment No. 271, and the Environmental Protection Plan contained in Appendix B are hereby incorporated in the license. ENO shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.
 - (3) <u>Fire Protection</u> ← [deleted]

maintain

ENO shall implement and maintain in effect all provisions of the approved fire protection program that comply with 10 CFR 50.48(a) and 10 CFR 50.48(c), as specified in the license amendment requests dated December 12, 2012, November 1, 2017, November 1, 2018, and March 8, 2019, as supplemented by letters dated February 21, 2013, September 30, 2013, October 24, 2013,

December 2, 2013, April 2, 2014, May 7, 2014, June 17, 2014, August 14, 2014, November 4, 2014, December 18, 2014, January 24, 2018, and May 28, 2019, as approved in the safety evaluations dated February 27, 2015, February 27, 2018, and August 20, 2019. Except where NRC approval for changes or deviations is required by 10 CFR 50.48(c), and provided no other regulation, technical specification, license condition or requirement would require prior NRC approval, the licensee may make changes to the fire protection program without prior approval of the Commission if those changes satisfy the provisions set forth in 10 CFR 50.48(a) and 10 CFR 50.48(c), the change does not require a change to a technical specification or a license condition, and the criteria listed below are satisfied.

(a) Risk-Informed Changes that May Be Made Without Prior NRC Approval

A risk assessment of the change must demonstrate that the acceptance criteria below are met. The risk assessment approach, methods, and data shall be acceptable to the NRC and shall be appropriate for the nature and scope of the change being evaluated; be based on the as-built, as operated, and maintained plant; and reflect the operating experience at the plant. Acceptable methods to assess the risk of the change may include methods that have been used in the peer-reviewed fire PRA model, methods that have been approved by NRC through a plant-specific license amendment or NRC approval of generic methods specifically for use in NFPA 805 risk assessments, or methods that have been demonstrated to bound the risk impact.

- 1. Prior NRC review and approval is not required for changes that clearly result in a decrease in risk. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.
- 2. Prior NRC review and approval is not required for individual changes that result in a risk increase less than 1x10⁻⁷/year (yr) for CDF and less than 1x10⁻⁸/yr for LERF. The proposed change must also be consistent with the defense-in-depth philosophy and must maintain sufficient safety margins. The change may be implemented following completion of the plant change evaluation.

(b) Other Changes that May Be Made Without Prior NRC Approval

 Changes to NFPA 805, Chapter 3, Fundamental Fire Protection Program

Prior NRC review and approval are not required for changes to the NFPA 805, Chapter 3, fundamental fire protection program elements and design requirements for which an engineering evaluation demonstrates that the alternative to the Chapter 3

element is functionally equivalent or adequate for the hazard. The licensee may use an engineering evaluation to demonstrate that a change to an NFPA 805, Chapter 3, element is functionally equivalent to the corresponding technical requirement. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the functionality of the component, system, procedure, or physical arrangement, using a relevant technical requirement or standard.

The licensee may use an engineering evaluation to demonstrate that changes to certain NFPA 805, Chapter 3, elements are acceptable because the alternative is "adequate for the hazard." Prior NRC review and approval would not be required for alternatives to four specific sections of NFPA 805, Chapter 3, for which an engineering evaluation demonstrates that the alternative to the Chapter 3 element is adequate for the hazard. A qualified fire protection engineer shall perform the engineering evaluation and conclude that the change has not affected the functionality of the component, system, procedure, or physical arrangement, using a relevant technical requirement or standard. The four specific sections of NFPA 805, Chapter 3, are as follows:

- "Fire Alarm and Detection Systems" (Section 3.8);
- "Automatic and Manual Water-Based Fire Suppression Systems" (Section 3.9);
- "Gaseous Fire Suppression Systems" (Section 3.10); and
- "Passive Fire Protection Features" (Section 3.11).

This License Condition does not apply to any demonstration of equivalency under Section 1.7 of NFPA 805.

2. Fire Protection Program Changes that Have No More than Minimal Risk Impact

Prior NRC review and approval are not required for changes to the licensee's fire protection program that have been demonstrated to have no more than a minimal risk impact. The licensee may use its screening process as approved in the NRC safety evaluation dated February 27, 2015, to determine that certain fire protection program changes meet the minimal criterion. The licensee shall ensure that fire protection defense-in-depth and safety

margins are maintained when changes are made to the fire protection program.

(c) Transition License Conditions

- Before achieving full compliance with 10 CFR 50.48(c), as specified by 2, below, risk-informed changes to the licensee's fire protection program may not be made without prior NRC review and approval unless the change has been demonstrated to have no more than a minimal risk impact, as described in 2. above.
- 2. The licensee shall implement the modifications to its facility, as described in Table S-2, "Plant Modifications Committed," of ENO letter PNP 2019-028 dated May 28, 2019, to complete the transition to full compliance with 10 CFR 50,48(c) before the end of the refueling outage following the fourth full operating cycle after NRC approval. The licensee shall maintain appropriate compensatory measures in place until completion of these modifications.
- 3. The licensee shall implement the items listed in Table S-3,
 "Implementation Items," of ENO letter PNP 2014-097 dated
 November 4, 2014, within six months after NRC approval, or six
 months after a refueling outage if in progress at the time of
 approval with the exception of Implementation Items 3 and 8 which
 will be completed once the related modifications are installed and
 validated in the PRA model.

[deleted]

- (4) The following requirements shall apply to control rod drive CRD-13 during cycle 25:
 - (a) Performance of Technical Specifications Surveillance Requirement SR 3.1.4.3 is not required for CRD-13 until the next entry into Mode 3.
 - (b) Seal leakage on CRD-13 shall be repaired prior to entering Mode 2, following the next Mode 3 entry.
 - (c) The reactor shall be shut down if CRD-13 seal leakage exceeds two gallons per minute.
- (5) [deleted]

 Movement of a fuel cask in or over the spent fuel pool is prohibited when irradiated fuel assemblies decayed less than 90 days are in the spent fuel pool.

- (6) Develop and maintain strategies for addressing large fires and explosions and that include the following key areas:
 - a. Fire fighting response strategy with the following elements:
 - 1. Pre-defined coordinated fire response strategy and guidance
 - 2. Assessment of mutual aid fire fighting assets
 - 3. Designated staging areas for equipment and materials
 - 4. Command and control
 - Training of response personnel
 - b. Operations to mitigate fuel damage considering the following:
 - 1. Protection and use of personnel assets
 - 2. Communications
 - 3. Minimizing fire spread
 - 4. Procedures for implementing integrated fire response strategy
 - 5. Identification of readily-available pre-staged equipment
 - 6. Training on integrated fire response strategy
 - 7. Spent fuel pool mitigation measures
 - c. Actions to minimize release to include consideration of:
 - 1. Water spray scrubbing
 - 2. Dose to onsite responders
- [deleted]

(7)

- Upon implementation of Amendment 230 adopting TSTF-448-A, revision 3, the determination of control room envelope (CRE) unfiltered air inleakage as required by SR 3.7.10.4, in accordance with TS 5.5.16.c.(i), the assessment of CRE habitability as required by Specification 5.5.16.c.(ii), and the measurement of CRE pressure as required by Specification 5.5.16.d, shall be considered met. Following implementation:
- (a) The first performance of SR 3.7.10.4, in accordance with Specification 5.5.16.c.(i), shall be within the specified Frequency of six years, plus the 18-month allowance of SR 3.0.2, as measured from June 26, 2007, the date of the most recent successful tracer gas test, as stated in the August 16, 2007, letter response to Generic Letter 2003-01.
- (b) The first performance of the periodic assessment of CRE habitability, Specification 5.5.16.c.(ii), shall be within three years, plus the nine-month allowance of SR 3.0.2, as measured from June 26, 2007, the date of the most recent successful tracer gas test, as stated in the August 16, 2007, letter response to Generic Letter 2003-01.
- (c) The first performance of the periodic measurement of CRE pressure, Specification 5.5.16.d, shall be within 18 months, plus the 138 days allowed by SR 3.0.2, as measured from July 16, 2007, the date of the most recent successful pressure measurement test.

-5c-

(8) Amendment 257 authorizes the implementation of 10 CFR 50.61a in lieu of 10 CFR 50.61.



D. The facility has been granted certain exemptions from Appendix J to 10 CFR Part 50, "Primary Reactor Containment Leakage Testing for Water Cooled Power Reactors." This section contains leakage test requirements, schedules and acceptance criteria for tests of the leak-tight integrity of the primary reactor containment and systems and components which penetrate the containment. These exemptions were granted in a letter dated December 6, 1989.

These exemptions granted pursuant to 10 CFR 50.12, are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security. With these exemptions, the facility will operate, to the extent authorized herein, in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission.

E. ENO shall fully implement and maintain in effect all provisions of the Commission-approved physical security, training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The combined set of plans, which contains Safeguards Information protected under 10 CFR 73.21, is entitled: "Entergy Nuclear Palisades Nuclear Plant Physical Security Plan."

ENO shall fully implement and maintain in effect all provisions of the Commission-approved cyber security plan (CSP), including changes made pursuant to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The Palisades CSP was approved by License Amendment No. 243 as supplemented by changes approved by License Amendment Nos. 248, 253, 259, and 264.

F. [deleted]

G. ENP and ENO shall have and maintain financial protection of such type and in such amounts as the Commission shall require in accordance with Section 170 of the Atomic Energy Act of 1954, as amended, to cover public liability claims. [deleted]

- H. The Updated Safety Analysis Report supplement, as revised, submitted pursuant to 10 CFR 54.21(d), shall be included in the next scheduled update to the Updated Safety Analysis Report required by 10 CFR 50.71(e)(4) following the issuance of this renewed operating license. Until that update is complete, ENO may make changes to the programs and activities described in the supplement without prior Commission approval, provided that ENO evaluates such changes pursuant to the criteria set forth in 10 CFR 50.59 and otherwise complies with the requirements in that section.
- I. The Updated Safety Analysis Report supplement, as revised, describes certain future activities to be completed prior to the period of extended operation. ENO shall complete these activities no later than March 24, 2011, and shall notify the NRC in writing when implementation of these activities is complete and can be verified by NRC inspection. [deleted]
- J. All capsules in the reactor vessel that are removed and tested must meet the test procedures and reporting requirements of American Society for Testing and Materials (ASTM) E 185 82 to the extent practicable for the configuration of the specimens in the capsule. Any changes to the capsule withdrawal schedule, including spare capsules, must be approved by the NRC prior to implementation. All capsules placed in storage must be maintained for future insertion. Any changes to storage requirements must be approved by the NRC, as required by 10 CFR Part 50, Appendix H. [[deleted]]
- K. This license is effective as of the date of issuance and shall expire at midnight on March 24, 2031.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

until the Commission notifies the licensee in writing that the license is terminated

J. E. Dyer, Director
Office of Nuclear Reactor Regulation

Attachments:

Permanently Defueled

- 1. Appendix A Technical Specifications
- 2. Appendix B Environmental Protection Plan

Date of Issuance: January 17, 2007

XXX XX, 20XX

PALISADES PLANT

RENEWED FACILITY OPERATING LICENSE DPR-20

APPENDIX A



TECHNICAL SPECIFICATIONS

XXX

As Amended through Amendment No. 271

1.0 USE AND APPLICATION

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-----NOTE-----

The defined terms of this section appear in capitalized type and are applicable throughout these Technical Specifications and Bases.

<u>Term</u>

Definition

ACTIONS shall be that part of a Specification that prescribes

Required Actions to be taken under designated Conditions

within specified Completion Times.

AVERAGE DISINTEGRATION

ENERGY E

E shall be the average (weighted in proportion to the sencentration of each radionuclide in the primary coolant at the time of sampling) of the sum of the average beta and gamma energies per disintegration (in MeV) for isotopes, other than iodines, with half lives > 15 minutes, making up at least 95% of the total noniodine activity in the coolant.

AXIAL OFFSET (AO)

AO shall be the power generated in the lower half of the core

less the power generated in the upper half of the core, divided by the sum of the power generated in the lower and upper halves of the core (determined using the incore

monitoring system).

AXIAL SHAPE INDEX (ASI)

ASI shall be the power generated in the lower half of the core

less the power generated in the upper half of the core, divided by the sum of the power generated in the lower and upper halves of the core (determined using the excore

monitoring system).

CERTIFIED FUEL HANDLER A CERTIFIED FUEL HANDLER is an individual who complies

with provisions of the CERTIFIED FUEL HANDLER training

and retraining program required by Specification 5.3.2.

CHANNEL CALIBRATION

A CHANNEL CALIBRATION shall be the adjustment, as necessary, of the channel output such that it responds within the necessary range and accuracy to known values of the parameter that the channel monitors. The CHANNEL CALIBRATION shall encompass all devices in the channel required for channel OPERABILITY and the CHANNEL FUNCTIONAL TEST.

Calibration of instrument channels with Resistance Temperature Detector (RTD) or thermocouple sensors may consist of an inplace qualitative assessment of sensor behavior and normal calibration of the remaining adjustable devices in the channel.

Whenever a RTD or thermosouple sensing element is replaced, the next required CHANNEL CALIBRATION shall include an inplace cross calibration that compares the other sensing elements with the recently installed sensing element.

The CHANNEL CALIBRATION may be performed by means of any series of sequential, overlapping, or total channel steps.

CHANNEL CHECK

A CHANNEL CHECK shall be the qualitative assessment, by observation, of channel behavior during operation. This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrument channels measuring the same parameter.

CHANNEL FUNCTIONAL TEST A CHANNEL FUNCTIONAL TEST shall be:

 Analog and bistable channels—the injection of a simulated or actual signal into the channel as close to the sensor as practicable to verify OPERABILITY, of all devices in the channel required for channel OPERABILITY;

1.1 Definitions

CHANNEL FUNCTIONAL TEST b. (continued)

Digital channels—the use of diagnostic programs to test digital hardware and the injection of simulated process data into the channel to verify OPERABILITY, of all devices in the channel required for channel OPERABILITY.

The CHANNEL FUNCTIONAL TEST may be performed by means of any series of sequential, everlapping, or total channel steps so that the entire channel is tested.

CORE ALTERATION

CORE ALTERATION shall be the movement of any fuel, sources, or control rods within the reactor vessel with the vessel head removed and fuel in the vessel. Suspension of CORE ALTERATIONS shall not preclude completion of movement of a component to a safe position.

CORE OPERATING LIMITS
REPORT (COLR)

The COLR is the plant specific document that provides cycle specific parameter limits for the current reload cycle. These cycle specific parameter limits shall be determined for each reload cycle in accordance with Specification 5.6.5. Plant operation within these limits is addressed in individual Specifications.

DOSE EQUIVALENT | 131

DOSE EQUIVALENT I 131 shall be that concentration of I-131 (microcuries/gram) that alone would produce the same thyroid dose as the quantity and isotopic mixture of I-131, I-132, I-133, I-134, and I-135 actually present. The dose conversion factors used for this calculation shall be those listed in Federal Guidance Report 11, "Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion and Ingestion," 1989; (Table 2:1, Exposure to Dose Conversion Factors for Inhalation).

PROGRAM

The INSERVICE TESTING PROGRAM is the licensee program that fulfills the requirements of 10 CFR 50.55a(f).

LEAKAGE

LEAKAGE shall be:

a. Identified LEAKAGE

- LEAKAGE, such as that from pump seals or valve packing (except Primary Coolant Pump seal water leakoff), that is captured and conducted to collection systems or a sump or collecting tank;
- LEAKAGE into the containment atmosphere from sources that are both specifically located and known not to interfere with the operation of leakage detection systems and not to be pressure boundary LEAKAGE; and
- Primary Coolant System (PCS) LEAKAGE through a Steam Generator to the Secondary System (primary to secondary LEAKAGE).

b. Unidentified LEAKAGE

All LEAKAGE (except Primary Coolant Pump seal leakoff) that is not identified LEAKAGE;

e. Pressure Boundary LEAKAGE

LEAKAGE (except primary to secondary LEAKAGE) through a nonisolable fault in an PCS component body, pipe wall, or vessel wall.

MODE

A MODE shall correspond to any one inclusive combination of core reactivity condition, power level, average primary coolant temperature, and reactor vessel head closure bolt tensioning specified in Table 1.1 1 with fuel in the reactor vessel.

NON-CERTIFIED OPERATOR

A NON-CERTIFIED OPERATOR is a non-licensed operator who complies with the qualification requirements of Specification 5.3.1.

OPERABLE OPERABILITY

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

PHYSICS TESTS

PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation. These tests are:

- a. Described in Chapter 13, Initial Tests and Operation, of the FSAR;
- b. Authorized under the provisions of 10 CFR 50.59; or
- e. Otherwise approved by the Nuclear Regulatory Commission.

QUADRANT POWER TILT (T.)

T_q shall be the maximum positive ratio of the power generated in any quadrant minus the average quadrant power, to the average quadrant power.

RATED THERMAL POWER (RTP)

RTP shall be a total reactor core heat transfer rate to the primary coolant of 2565.4-MWt.

REFUELING BORON CONCENTRATION

REFUELING BORON CONCENTRATION shall be a Primary Coolant System boron concentration of \geq 1720 ppm and sufficient to assure the reactor is subcritical by \geq 5% $\Delta\rho$ with all control rods withdrawn.

SHUTDOWN MARGIN (SDM)

SDM shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming:

- a. All full length control rods (shutdown and regulating) are fully inserted except for the single rod of highest reactivity worth, which is assumed to be fully withdrawn. However, with all full length control rods verified fully inserted by two independent means, it is not necessary to account for a stuck rod in the SDM calculation. With any full length control rods not capable of being fully inserted, the reactivity worth of these rods must be accounted for in the determination of SDM; and
- b. There is no change in part length rod position.

STAGGERED TEST BASIS

A STAGGERED TEST BASIS shall consist of the testing of one of the systems, subsystems, channels, or other designated components during the interval specified by the Surveillance Frequency, so that all systems, subsystems, channels, or other designated components are tested during *n* Surveillance Frequency intervals, where *n* is the total number of systems, subsystems, channels, or other designated components in the associated function.

THERMAL POWER

THERMAL POWER shall be the total reactor core heat transfer rate to the primary coolant.

TOTAL RADIAL PEAKING FACTOR (F_R^T)

F_R^T shall be the maximum ratio of the individual fuel pin power to the core average pin power integrated over the total core height, including tilt.

Table 1.1 1 (page 1 of 1) MODES

MODE	TITLE	REACTIVITY CONDITION (Kerr)	% RATED THERMAL POWER(a)	AVERAGE PRIMARY COOLANT TEMPERATURE (°F)
4	Power Operation	≥ 0.99	>-5	NA
2	Startup	≥ 0.09	≤ 6	AA
3	Hot Standby	< 0.99	NA	≥ 300
4	Hot Shutdown ^(b)	< 0.99	NA	300 > T _{ave} > 200
5	Cold Shutdown(b)	< 0.99	NA	≤ 200
6	Refueling(e)	NA	NA	NA

- (a) Excluding decay heat.
- (b) All reactor vessel head closure bolts fully tensioned.
- (e) One or more reactor vessel head closure bolts less than fully tensioned.

1.0 USE AND APPLICATION

1.2 Logical Connectors

PURPOSE

The purpose of this section is to explain the meaning of logical connectors.

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Logical connectors are used in Technical Specifications (TS) to discriminate between, and yet connect, discrete Conditions, Required Actions, Completion Times, Surveillances, and Frequencies. The only logical connectors that appear in TS are AND and OR. The physical arrangement of these connectors constitutes logical conventions with specific meanings.

Levels

BACKGROUND

Several levels of logic may be used to state Required Actions. These levels are identified by the placement (or nesting) of the logical connectors and by the number assigned to each Required Action. The first level of logic is identified by the first digit of the number assigned to a Required Action and the placement of the logical connector in the first level of nesting (i.e., left justified with the number of the Required Action). The successive levels of logic are identified by additional digits of the Required Action number and by successive indentions of the logical connectors.

When logical connectors are used to state a Condition, Completion Time, Surveillance, or Frequency, only the first level of logic is used, and the logical connector is left justified with the statement of the Condition, Completion Time, Surveillance, or Frequency.

1.2 Logical Connectors

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EXAMPLES

The following examples illustrate the use of logical connectors.

EXAMPLE 1.2-1

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. LCO not met.	A.1 Verify AND A.2 Restore	tiate

In this example the logical connector <u>AND</u> is used to indicate that when in Condition A, both Required Actions A.1 and A.2 must be completed.

1.2 Logical Connectors

EXAMPLES (continued)

EXAMPLE 1.2 2

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
A. LCO not met.	A.1	Trip	
	<u>OR</u>		
	A.2.1	Verify	
	ANE	9	
	A.2.2.1	Reduce	
		OR	
	A.2.2.2	Perform	
	OR		
	A.3 Alig	n 	

This example represents a more complicated use of logical connectors. Required Actions A.1, A.2, and A.3 are alternative choices, only one of which must be performed as indicated by the use of the logical connector OR and the left justified placement. Any one of these three Actions may be chosen. If A.2 is chosen, then both A.2.1 and A.2.2 must be performed as indicated by the logical connector AND. Required Action A.2.2 is met by performing A.2.2.1 or A.2.2.2. The indented position of the logical connector OR indicates that A.2.2.1 and A.2.2.2 are alternative choices, only one of which must be performed.

facility

facility

1.0 USE AND APPLICATION

storage and handling of spent nuclear fuel

1.3 Completion Times

PURPOSE

The purpose of this section is to establish the Completion Time convention and to provide guidance for its use.

BACKGROUND

Limiting Conditions for Operation (LCOs) specify minimum requirements for ensuring safe operation of the plant. The ACTIONS associated with an LCO state Conditions that typically describe the ways in which the requirements of the LCO can fail to be met. Specified with each stated Condition are Required Action(s) and Completion Time(s).

DESCRIPTION

The Completion Time is the amount of time allowed for completing a Required Action. It is referenced to the discovery of a situation (e.g. inoperable equipment or variable not within limits) that requires entering an ACTIONS Condition unless otherwise specified, providing the plant is in a MODE or specified condition stated in the Applicability of the LCO.

The

Certified Fuel Handler (CFH)

Unless otherwise specified, the Completion Time begins when a senior. licensed operator on the operating shift crew with responsibility for plant operations makes the determination that an LCO is not met and an ACTIONS Condition is entered. The "otherwise specified" exceptions are varied, such as a Required Action Note or Surveillance Requirement Note that provides an alternative time to perform specific tasks, such as testing, without starting the Completion Time. While utilizing the Note. should a Condition be applicable for any reason not addressed by the Note, the Completion Time begins. Should the time allowance in the Note be exceeded, the Completion Time begins at that point. The exceptions may also be incorporated into the Completion Time. For example, LCO 3.8.1, "AC Sources Operating," Required Action B.2, requires declaring required feature(s) supported by an inoperable diesel generator, inoperable when the redundant required feature(s) are inoperable. The Completion Time states. "4 hours from discovery of Condition B concurrent with inoperability of redundant required feature(s)." In this case the Completion Time does not begin until the conditions in the Completion Time are satisfied.

facility

Required Actions must be completed prior to the expiration of the specified Completion Time. An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the plant is not within the LCO Applicability.

If situations are discovered that require entry into more than one Condition at a time within a single LCO (multiple Conditions), the Required Actions for each Condition must be performed within the

DESCRIPTION (continued)

associated Completion Time. When in multiple Conditions, separate Completion Times are tracked for each Condition starting from the discovery of the situation that required entry into the Condition, unless otherwise specified.

Once a Condition has been entered, subsequent trains, subsystems, components, or variables expressed in the Condition, discovered to be inoperable or not within limits, will not result in separate entry into the Condition, unless specifically stated. The Required Actions of the Condition continue to apply to each additional failure, with Completion Times based on initial entry into the Condition, unless otherwise specified.

However, when a <u>subsequent</u> train, subsystem, component, or variable expressed in the Condition is discovered to be inoperable or not within limits, the Completion Time(s) may be extended. To apply this Completion Time extension, two criteria must first be met. The subsequent inoperability:

- a. Must exist concurrent with the first inoperability; and
- b. Must remain inoperable or not within limits after the first inoperability is resolved.

The total Completion Time allowed for completing a Required Action to address the subsequent inoperability shall be limited to the more restrictive of either:

- a. The stated Completion Time, as measured from the initial entry into the Condition, plus an additional 24 hours; or
- b. The stated Completion Time as measured from discovery of the subsequent inoperability.

The above Completion Time extensions do not apply to those Specifications that have exceptions that allow completely separate re entry into the Condition (for each train, subsystem, component, or variable expressed in the Condition) and separate tracking of Completion Times based on this re entry. These exceptions are stated in individual Specifications.

The above Completion Time extension does not apply to a Completion Time with a modified "time zero." This modified "time zero" may be expressed as a repetitive time (i.e., "once per 8 hours," where the Completion Time is referenced from a previous completion of the Required Action versus the time of Condition entry) or as a time modified by the phrase "from discovery . . . " Example 1.3 3 illustrates one use of

EXAMPLES (continued)

EXAMPLE 1.3 2

ACTIONS

terrene		
CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One pump inoperable.	A.1 Restore pump to OPERABLE status.	7 days
B. Required Action and associated Completion	B.1 Be in MODE 3.	6 hours
Time not met.	B.2 Be in MODE 5.	36 hours

When a pump is declared inoperable, Condition Λ is entered. If the pump is not restored to OPERABLE status within 7 days, Condition B is also entered and the Completion Time clocks for Required Actions B.1 and B.2 start. If the inoperable pump is restored to OPERABLE status after Condition B is entered, Condition Λ and B are exited, and therefore, the Required Actions of Condition B may be terminated.

When a second pump is declared inoperable while the first pump is still inoperable, Condition Λ is not re-entered for the second pump. LCO 3.0.3 is entered, since the Λ CTIONS do not include a Condition for more than one inoperable pump. The Completion Time clock for Condition Λ does not stop after LCO 3.0.3 is entered, but continues to be tracked from the time Condition Λ was initially entered.

While in LCO 3.0.3, if one of the inoperable pumps is restored to OPERABLE status and the Completion Time for Condition A has not expired, LCO 3.0.3 may be exited and operation continued in accordance with Condition A.

While in LCO 3.0.3, if one of the inoperable pumps is restored to OPERABLE status and the Completion Time for Condition A has expired, LCO 3.0.3 may be exited and operation continued in accordance with Condition B.

EXAMPLES

EXAMPLE 1.3 2 (continued)

The Completion Time for Condition B is tracked from the time the Condition A Completion Time expired.

On restoring one of the pumps to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first pump was declared inoperable. This Completion Time may be extended if the pump restored to OPERABLE status was the first inoperable pump. A 24 hour extension to the stated 7 days is allowed, provided this does not result in the second pump being inoperable for > 7 days.

EXAMPLES (continued)

EXAMPLE 1.3 3

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One Function X train inoperable.	A.1 Restore Function X train to OPERABLE status.	7-days AND 10-days from discovery of failure to meet the LCO
B. One Function Y train inoperable.	B.1 Restore Function Y train to OPERABLE status.	72 hours AND 10 days from discovery of failure to meet the LCO
C. One Function X train inoperable. AND One Function Y train inoperable.	C.1 Restore Function X train to OPERABLE status. OR C.2 Restore Function Y train to OPERABLE status.	12 hours

EXAMPLES

EXAMPLE 1.3 3 (continued)

When one Function X train and one Function Y train are inoperable, Condition A and Condition B are concurrently applicable. The Completion Times for Condition A and Condition B are tracked separately for each train starting from the time each train was declared inoperable and the Condition was entered. A separate Completion Time is established for Condition C and tracked from the time the second train was declared inoperable (i.e., the time the situation described in Condition C was discovered).

If Required Action C.2 is completed within the specified Completion Time, Conditions B and C are exited. If the Completion Time for Required Action A.1 has not expired, operation may continue in accordance with Condition A. The remaining Completion Time in Condition A is measured from the time the affected train was declared inoperable (i.e., initial entry into Condition A).

The Completion Times of Conditions A and B are modified by a logical connector, with a separate 10 day Completion Time measured from the time it was discovered the LCO was not met. In this example, without the separate Completion Time, it would be possible to alternate between Conditions A, B, and C in such a manner that operation could continue indefinitely without ever restoring systems to meet the LCO. The separate Completion Time modified by the phrase "from discovery of failure to meet the LCO" is designed to prevent indefinite continued operation while not meeting the LCO. This Completion Time allows for an exception to the normal "time zero" for beginning the Completion Time "clock." In this instance, the Completion Time "time zero" is specified as commencing at the time the LCO was initially not met, instead of at the time the associated Condition was entered.

EXAMPLES (continued)

EXAMPLE 1.3 4

ACTIONS

CONDITION	REQUIRED ACTION	ION COMPLETION TIM	
A. One or more valves inoperable.	A.1 Restore valve(s) to OPERABLE status.	4 hours	
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3. AND B.2 Be in MODE 4.	6 hours	

A single Completion Time is used for any number of valves inoperable at the same time. The Completion Time associated with Condition A is based on the initial entry into Condition A and is not tracked on a per valve basis. Declaring subsequent valves inoperable, while Condition A is still in effect, does not trigger the tracking of separate Completion Times.

Once one of the valves has been restored to OPERABLE status, the Condition A Completion Time is not reset, but continues from the time the first valve was declared inoperable. The Completion Time may be extended if the valve restored to OPERABLE status was the first inoperable valve. The Condition A Completion Time may be extended for up to 4 hours provided this does not result in any subsequent valve being inoperable for > 4 hours.

If the Completion Time of 4 hours (including the extension) expires while one or more valves are still inoperable, Condition B is entered.

EXAMPLES (continued)

EXAMPLE 1.35

ACTIONS

NOTE

Separate Condition entry is allowed for each inoperable valve.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more valves inoperable.	A.1 Restore valve to OPERABLE status.	4 hours
B. Required Action and associated	B.1 Be in MODE 3.	6 hours
Completion Time not met.	B.2 Be in MODE 4.	12 hours

The Note above the ACTIONS Table is a method of modifying how the Completion Time is tracked. If this method of modifying how the Completion Time is tracked was applicable only to a specific Condition, the Note would appear in that Condition rather than at the top of the ACTIONS Table.

The Note allows Condition A to be entered separately for each inoperable valve, and Completion Times tracked on a per valve basis. When a valve is declared inoperable, Condition A is entered and its Completion Time starts. If subsequent valves are declared inoperable, Condition A is entered for each valve and separate Completion Times start and are tracked for each valve.

If the Completion Time associated with a valve in Condition A expires, Condition B is entered for that valve. If the Completion Times associated with subsequent valves in Condition A expire, Condition B is entered separately for each valve and separate Completion Times start and are tracked for each valve. If a valve that caused entry into Condition B is restored to OPERABLE status, Condition B is exited for that valve.

Since the Note in this example allows multiple Condition entry and tracking of separate Completion Times, Completion Time extensions do not apply.

(continued)

EXAMPLE 1.36

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One channel inoperable.	A.1 Perform SR 3.x.x.x. OR A.2 Reduce THERMAL POWER to ≤ 50% RTP.	Once per 8 hours 8 hours
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	6 hours

Entry into Condition A offers a shoice between Required Action A.1 or A.2. Required Action A.1 has a "once per" Completion Time, which qualifies for the 25% extension, per SR 3.0.2, to each performance after the initial performance. The initial 8 hour interval of Required Action A.1 begins when Condition A is entered and the initial performance of Required Action A.1 must be complete within the first 8 hour interval. If Required Action A.1 is followed and the Required Action is not met within the Completion Time (plus the extension allowed by SR 3.0.2), Condition B is entered. If Required Action A.2 is followed and the Completion Time of 8 hours is not met, Condition B is entered.

If after entry into Condition B, Required Action A.1 or A.2 is met, Condition B is exited and operation may then continue in Condition A.

(continued)

EXAMPLE 1.37

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME	
A. One subsystem inoperable.	A.1 Verify affected subsystem isolated.	1 hour AND Once per 8 hours thereafter	
	AND A.2 Restore subsystem to OPERABLE status.	72 hours	
B. Required Action and associated Completion	B.1 Be in MODE 3.	6 hours	
Time not met.	B.2 Be in MODE 5.	36 hours	

Required Action A.1 has two Completion Times. The 1 hour Completion Time begins at the time the Condition is entered and each "Once per 8 hours thereafter" interval begins upon performance of Required Action A.1.

If after Condition A is entered, Required Action A.1 is not met within either the initial 1 hour or any subsequent 8 hour interval from the previous performance (plus the extension allowed by SR 3.0.2), Condition B is entered.

EXAMPLES

EXAMPLE 1.3 7 (continued)

The Completion Time clock for Condition A does not stop after Condition B is entered, but continues from the time Condition A was initially entered. If Required Action A.1 is met after Condition B is entered, Condition B is exited and operation may continue in accordance with Condition A, provided the Completion Time for Required Action A.2 has not expired.

IMMEDIATE

When "Immediately" is used as a Completion Time, the Required Action COMPLETION TIME should be pursued without delay and in a controlled manner.

1.0 USE AND APPLICATION

1.4 Frequency

PURPOSE

The purpose of this section is to define the proper use and application of Frequency requirements.

DESCRIPTION

Each Surveillance Requirement (SR) has a specified Frequency in which the Surveillance must be met in order to meet the associated LCO. An understanding of the correct application of the specified Frequency is necessary for compliance with the SR.

The "specified Frequency" is referred to throughout this section and each of the Specifications of Section 3.0, Surveillance Requirement (SR) Applicability. The "specified Frequency" consists of the requirements of the Frequency column of each SR, as well as certain Notes in the Surveillance column that modify performance requirements.

Sometimes special situations dictate when the requirements of a Surveillance are to be met. They are "otherwise stated" conditions allowed by SR 3.0.1. They may be stated as clarifying Notes in the Surveillance, as part of the Surveillance, or both.

Situations where a Surveillance could be required (i.e., its Frequency could expire), but where it is not possible or not desired that it be performed until sometime after the associated LCO is within its Applicability, represent potential SR 3.0.4 conflicts. To avoid these conflicts, the SR (i.e., the Surveillance or the Frequency) is stated such that it is only "required" when it can be and should be performed. With an SR satisfied, SR 3.0.4 imposes no restriction.

The use of "met" and "performed" in these instances conveys specific meanings. A Surveillance is "met" only when the acceptance criteria are satisfied. Known failure of the requirements of a Surveillance, even without a Surveillance specifically being "performed," constitutes a Surveillance not "met." "Performance" refers only to the requirement to specifically determine the ability to meet the acceptance criteria.

DESCRIPTION (continued)

Some Surveillances contain notes that modify the Frequency of performance or the conditions during which the acceptance criteria must be satisfied. For these Surveillances, the MODE entry restrictions of SR 3.0.4 may not apply. Such a Surveillance is not required to be performed prior to entering a MODE or other specified condition in the Applicability of the associated LCO if any of the following three conditions are satisfied:

- a. The Surveillance is not required to be met in the MODE or other specified condition to be entered; or
- b. The Surveillance is required to be met in the MODE or other specified condition to be entered, but has been performed within the specified Frequency (i.e., it is current) and is known not to be failed; or
- e. The Surveillance is required to be met, but not performed, in the MODE or other specified condition to be entered, and is known not to be failed.

Examples 1.4 3, 1.4 4, 1.4 5, and 1.4 6 discuss these special situations.

EXAMPLES

The following examples illustrate the various ways that Frequencies are specified. In these examples, the Applicability of the LCO (LCO not shown) is MODES 1, 2, and 3.

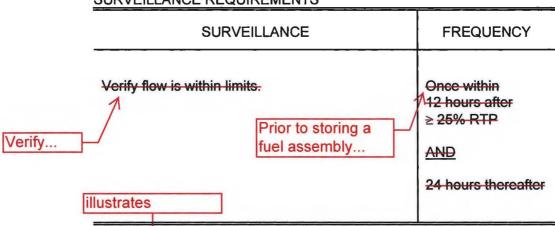
illustrate the type of Frequency statements that appear in the Technical Specifications (TS).

1.4 Frequency

(continued)

EXAMPLE 1.4-2

SURVEILLANCE REQUIREMENTS



Example 1.4-2 has two Frequencies. The first is a one time performance Frequency, and the second is of the type shown in Example 1.4 1. The logical connector "AND" indicates that both Frequency requirements must be met. Each time reactor power is increased from a power level < 25% RTP to ≥ 25% RTP, the Surveillance must be performed within 12 hours.

The use of "once" indicates a single performance will satisfy the specified Frequency (assuming no other Frequencies are connected by "AND"). This type of Frequency does not qualify for the extension allowed by SR 3.0.2. "Thereafter" indicates future performances must be established per SR 3.0.2, but only after a specified condition is first met (i.e., the "once" performance in this example). If reactor power decreases to < 25% RTP, the measurement of both intervals stops. New intervals start upon reactor power reaching 25% RTP.

EXAMPLES (continued)

EXAMPLE 1.43

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
NOTE Not required to be performed until 12 hours after ≥ 25% RTP.	
Perform channel adjustment.	7 days

The interval continues, whether or not the plant operation is < 25% RTP between performances.

As the Note modifies the required <u>performance</u> of the Surveillance, it is construed to be part of the "specified Frequency." Should the 7 day interval be exceeded while operation is < 25% RTP, this Note allows 12 hours after power reaches ≥ 25% RTP to perform the Surveillance. The Surveillance is still considered to be performed within the "specified Frequency." The interval continues, whether or not the plant operation is < 25% RTP between performances. Therefore, if the Surveillance were not performed within the 7 day (plus the extension allowed by SR 3.0.2) interval, but operation was < 25% RTP, it would not constitute a failure of the SR or failure to meet the LCO. Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not exceed 12 hours with power ≥ 25% RTP.

Once the plant reaches 25% RTP, 12 hours would be allowed for completing the Surveillance. If the Surveillance were not performed within this 12 hour interval, there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

EXAMPLES EXAMPLE 1.4.4 (continued)

	FREQUENCY		24 hours
SURVEILLANCE REQUIREMENTS	SURVEILLANCE	NOTE Only required to be met in MODE 1.	Verify leakage rates are within limits.

into MODE 1. Prior to entering MODE 1 (assuming again that the 24 hour 24 hour Frequency exceeded, provided the MODE change was not made for the Frequency of this Surveillance continues at all times, as described Example 1.4 4 specifies that the requirements of this Surveillance do not would be no failure of the SR nor failure to meet the LCO. Therefore, no Surveillance were not performed within the 24 hour interval (plus the extension allowed by SR 3.0.2), but the plant was not in MODE 1, there have to be met until the plant is in MODE 1. The interval measurement in Example 1.4 1. However, the Note constitutes an "otherwise stated" Frequency were not met), SR 3.0.4 would require satisfying the SR. violation of SR 3.0.4 occurs when changing MODES, even with the exception to the Applicability of this Surveillance. Therefore, if the

EXAMPLES (continued)

EXAMPLE 1.4 5

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
NOTE Only required to be performed in MODE 1.	_
Perform complete cycle of the valve.	7 days

The interval continues, whether or not the plant operation is in MODE 1, 2, or 3 (the assumed Applicability of the associated LCO) between performances.

As the Note modifies the required performance of the Surveillance, the Note is construed to be part of the "specified Frequency." Should the 7 day interval be exceeded while operation is not in MODE 1, this Note allows entry into and operation in MODES 2 and 3 to perform the Surveillance. The Surveillance is still considered to be performed within the "specified Frequency" if completed prior to entering MODE 1. Therefore, if the Surveillance were not performed within the 7 day (plus the extension allowed by SR 3.0.2) interval, but operation was not in MODE 1, it would not constitute a failure of the SR or failure to meet the LCO. Also, no violation of SR 3.0.4 occurs when changing MODES, even with the 7 day Frequency not met, provided operation does not result in entry into MODE 1.

Once the plant reaches MODE 1, the requirement for the Surveillance to be performed within its specified Frequency applies and would require that the Surveillance had been performed. If the Surveillance were not performed prior to entering MODE 1, there would then be a failure to perform a Surveillance within the specified Frequency, and the provisions of SR 3.0.3 would apply.

EXAMPLES (continued)

EXAMPLE 1.46

SURVEILLANCE REQUIREMENTS

FREQUENCY
24 hours

Example 1.4 6 specifies that the requirements of this Surveillance do not have to be met while the plant is in MODE 3 (the assumed Applicability of the associated LCO is MODES 1, 2, and 3). The interval measurement for the Frequency of this Surveillance continues at all times, as described in Example 1.4 1. However, the Note constitutes an "otherwise stated" exception to the Applicability of this Surveillance. Therefore, if the Surveillance were not performed within the 24 hour interval (plus the extension allowed by SR 3.0.2), but the plant was in MODE 3, there would be no failure of the SR nor failure to meet the LCO. Therefore, no violation of SR 3.0.4 occurs when changing MODES to enter MODE 3, even with the 24 hour Frequency exceeded, provided the MODE change does not result in entry into MODE 2. Prior to entering MODE 2 (assuming again that the 24 hour Frequency were not met), SR 3.0.4 would require satisfying the SR.

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 In MODES 1 and 2, the Departure from Nucleate Boiling Ratio (DNBR) shall be maintained at or above the following DNB correlation safety limits:

Correlation	Safety Limit
XNB	1.17
ANFP	1.154
HTP	1.141

2.1.1.2 In MODES 1 and 2, the peak Linear Heat Rate (LHR) (adjusted for fuel rod dynamics) shall be maintained at ≤ 21.0 kW/ft.

2.1.2 Primary Coolant System (PCS) Pressure SL

In MODES 1, 2, 3, 4, 5, and 6, the PCS pressure shall be maintained at ≤ 2750 psia.

2.2 SL Violations

- 2.2.1 If SL 2.1.1.1 or SL 2.1.1.2 is violated, restore compliance and be in MODE 3 within 1 hour.
- 2.2.2 If SL 2.1.2 is violated:
 - 2.2.2.1 In MODE 1 or 2, restore compliance and be in MODE 3 within 1 hour.
 - 2.2.2.2 In MODE 3, 4, 5, or 6, restore compliance within 5 minutes.

LCO 3.0.1	LCOs shall be met during the MODES or other specified conditions in the
	Applicability, except as provided in LCO 3.0.2, LCO 3.0.7, LCO 3.0.8, and LCO 3.0.9.
LCO 3.0.2	Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.
	If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.
LCO 3.0.3	When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the plant shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the plant, as applicable, in:
	a. MODE 3 within 7 hours;
	b. MODE 4 within 31 hours; and
	c. MODE 5 within 37 hours.
	Exceptions to this Specification are stated in the individual Specifications.
	Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.
	LCO 3.0.3 is only applicable in MODES 1, 2, 3, and 4.
LCO 3.0.4	When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall only be made:
	a. 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;

LCO 3.0.4 (continued)

- b. After performance of a risk assessment addressing inoperable systems and components, consideration of the results, determination of the acceptability of entering the MODE or other specified condition in the Applicability, and establishment of risk management actions, if appropriate (exceptions to this Specification are stated in the individual Specifications); or
- When an allowance is stated in the individual value, parameter, or other Specification.

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 plant.

LCO 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.

LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, an evaluation shall be performed in accordance with Specification 5.5.13, "Safety Function Determination Program (SFDP)." 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. When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

3.0 LCO APPLICABILITY

LCO 3.0.7

Special Test Exception (STE) LCOs in each applicable LCO section allow specified Technical Specifications (TS) requirements to be changed to permit performance of special tests and operations. Unless otherwise specified, all other TS requirements remain unchanged. Compliance with STE LCOs is optional. When an STE LCO is desired to be met but is not met, the ACTIONS of the STE LCO shall be met. When an STE LCO is not desired to be met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with the other applicable Specifications.

LCO 3.0.8

When one or more required snubbers are unable to perform their associated support function(s), any affected supported LCO(s) are not required to be declared not met solely for this reason if risk is assessed and managed, and:

- a. the snubbers not able to perform their associated support function(s) are associated with only one train or subsystem of a multiple train or subsystem supported system or are associated with a single train or subsystem supported system and are able to perform their associated support function within 72 hours; or
- b. the snubbers not able to perform their associated support function(s) are associated with more than one train or subsystem of a multiple train or subsystem supported system and are able to perform their associated support function within 12 hours.

At the end of the specified period the required snubbers must be able to perform their associated support function(s), or the affected supported system LCO(s) shall be declared not met.

LCO 3.0.9

When one or more required barriers are unable to perform their related support function(s), any supported system LCO(s) are not required to be declared not met solely for this reason for up to 30 days provided that at least one train or subsystem of the supported system is OPERABLE and supported by barriers capable of providing their related support function(s), and risk is assessed and managed. This specification may be concurrently applied to more than one train or subsystem of a multiple train or subsystem supported system provided at least one train or subsystem of the supported system is OPERABLE and the barriers supporting each of these trains or subsystems provide their related support function(s) for different categories of initiating events.

3.0 LCO APPLICABILITY

LCO 3.0.9 (continued)

If the required OPERABLE train or subsystem becomes inoperable while this specification is in use, it must be restored to OPERABLE status within 24 hours or the provisions of this specification cannot be applied to the trains or subsystems supported by the barriers that cannot perform their related support function(s).

At the end of the specified period, the required barriers must be able to perform their related support function(s) or the supported system LCO(s) shall be declared not met.

3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

SR 3.0.1

SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Failure to meet a Surveillance, whether such failure is experienced during the performance of the Surveillance or between performances of the Surveillance, shall be failure to meet the LCO. Failure to perform a Surveillance within the specified Frequency shall be failure to meet the LCO except as provided in SR 3.0.3. Surveillances do not have to be performed on inoperable equipment or variables outside specified limits.

SR 3.0.2

The specified Frequency for each SR is met if the Surveillance is performed within 1.25 times the interval specified in the Frequency, as measured from the previous performance or as measured from the time a specified condition of the Frequency is met.

For Frequencies specified as "once," the above interval extension does not apply.

If a Completion Time requires periodic performance on a "once per . . ." basis, the above Frequency extension applies to each performance after the initial performance.

Exceptions to this Specification are stated in the individual Specifications.

SR 3.0.3

If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is greater. This delay period is permitted to allow performance of the Surveillance. The delay period is only applicable when there is a reasonable expectation the surveillance will be met when performed. A risk evaluation shall be performed for any Surveillance delayed greater than 24 hours and the risk impact shall be managed.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

3.0 SR APPLICABILITY

SR 3.0.4

Entry into a MODE or other specified condition in the Applicability of an LCO shall only be made when the LCO's Surveillances have been met within their specified Frequency, except as provided by SR 3.0.3. When an LCO is not met due to Surveillances not having been met, entry into a MODE or other specified condition in the Applicability shall only be made in accordance with LCO 3.0.4.

This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the plant.



3.7 PLANT SYSTEMS

3.7.14 Spent Fuel Pool (SFP) Water Level

LCO 3.7.14	The SFP water level shall be ≥ 647 ft elevation.
	SFP level may be below the 647 ft elevation to support fuel cask movement, if the displacement of water by the fuel cask when submerged in the SFP, would raise SFP level to ≥ 647 ft elevation.
APPLICABILITY:	During movement of irradiated fuel assemblies in the SFP,

During movement of irradiated fuel assemblies in the SFP,

During movement of a fuel cask in or over the SFP.

ACTIONS

-NOTE-

LCO 3.0.3 is not applicable.

	CONDITION	F	REQUIRED ACTION	COMPLETION TIME
Α.	SFP water level not within limit.	A.1	Suspend movement of irradiated fuel assemblies in SFP.	Immediately
		AND		
		A.2	Suspend movement of fuel cask in or over the SFP.	Immediately

SURVEILLANCE	REQUIREMENTS	7 days
	SURVEILLANCE	FREQUENCY
SR 3.7.14.1	Verify the SFP water level is ≥ 647 ft elevation.	In accordance with the Surveillance Frequency Control Program



3.7 PLANT SYSTEMS

3.7.15 Spent Fuel Pool (SFP) Boron Concentration

LCO 3.7.15

The SFP boron concentration shall be ≥ 1720 ppm.

APPLICABILITY:

When fuel assemblies are stored in the Spent Fuel Pool.

ACTIONS

LCO 3.0.3 is not applicable.

	CONDITION	F	REQUIRED ACTION	COMPLETION TIME
A.	SFP boron concentration not within limit.	A.1	Suspend movement of fuel assemblies in the SFP.	Immediately
		AND		
		A.2	Initiate action to restore SFP boron concentration to within limit.	Immediately

SURVEILLANCE REQUIREMENTS	7 day
SURVEILLANCE	FREQUENCY
SR 3.7.15.1 Verify the SFP boron concentration is within limit.	In accordance with the Surveillance Frequency Control Program



3.7 PLANT SYSTEMS

3.7.16 Spent Fuel Pool Storage

LCO 3.7.16 Storage in the spent fuel pool shall be as follows:

- a. Each fuel assembly and non-fissile bearing component stored in a Region I Carborundum equipped storage rack shall be within the limitations in Specification 4.3.1.1 and, as applicable, within the requirements of the maximum nominal planar average U-235 enrichment and burnup of Tables 3.7.16-2, 3.7.16-3, 3.7.16-4 or 3.7.16-5,
- b. Fuel assemblies in a Region I Metamic equipped storage rack shall be within the limitations in Specification 4.3.1.2, and
- c. The combination of maximum nominal planar average U-235 enrichment, burnup, and decay time of each fuel assembly stored in Region II shall be within the requirements of Table 3.7.16-1.

APPLICABILITY: Whenever any fuel assembly or non-fissile bearing component is stored in the spent fuel pool or the north tilt pit.

ACTIONS

NOTE-----

LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Requirements of the LCO not met.	A.1 Initiate action to restore the noncomplying fuel assembly or non-fissile bearing component within requirements.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.16.1	Verify by administrative means each fuel assembly or non-fissile bearing component meets fuel storage requirements.	Prior to storing the fuel assembly or non-fissile bearing component in the spent fuel pool

4.1 Site Location

The Palisades Nuclear Plant is located on property owned by Entergy Nuclear Palisades, LLC on the eastern shore of Lake Michigan approximately four and one-half miles south of the southern city limits of South Haven, Michigan. The minimum distance to the boundary of the exclusion area as defined in 10 CFR 100.3 shall be 677 meters.

4.2 Reactor Core (Deleted)

4.2.1 Fuel Assemblies

The reactor core shall contain 204 fuel assemblies. Each assembly shall consist of a matrix of zircaley 4 or M5 clad fuel rods with an initial composition of depleted, natural, or slightly enriched uranium dioxide (UO₂) as fuel material. 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 applicable NRC staff approved codes and methods and shown by tests or analyses to comply with all fuel safety design bases. A limited number of lead test assemblies that have not completed representative testing may be placed in nonlimiting core regions. A core plug or plugs may be used to replace one or more fuel assemblies subject to the analysis of the resulting power distribution. Poison may be placed in the fuel bundles for long term reactivity control.

4.2.2 Control Rod Assemblies

The reactor core shall contain 45 control rods. Four of these control rods may consist of part length absorbers. The control material shall be silver indium cadmium, as approved by the NRC.

4.3 Fuel Storage

4.3.1 Criticality

4.3.1.1 The Region I (See Figure B 3.7.16-1) Carborundum equipped fuel storage racks incorporating Regions 1A, 1B, 1C, 1D, and 1E are designed and shall be maintained with:

a. New or irradiated fuel assemblies having a maximum nominal planar average U-235 enrichment of 4.54 weight percent;

Irradiated

4.3.1 Criticality (continued)

- Control blades may be stored in both fueled and unfueled locations in Regions 1D and 1E, with no limitation on the number.
- 4.3.1.2 The Region I (See Figure B 3.7.16-1) Metamic equipped fuel storage racks are designed and shall be maintained with:
 - a. Fuel assemblies having a maximum nominal planar average U-235 enrichment of 4.95 weight percent;
 - Keff < 1.0 if fully flooded with unborated water, which includes allowances for uncertainties as described in Section 9.11 of the FSAR:
 - Keff ≤ 0.95 if fully flooded with water borated to 850 ppm, which includes allowances for uncertainties as described in Section 9.11 of the FSAR;
 - d. A nominal 10.25 inch center to center distance between fuel assemblies;

Irradiated

- e. New or irradiated fuel assemblies;
- f. Two empty rows of storage locations shall exist between the fuel assemblies in a Carborundum equipped rack and the fuel assemblies in an adjacent Metamic equipped rack; and
- g. A minimum Metamic B¹⁰ areal density of 0.02944 g/cm².
- 4.3.1.3 The Region II fuel storage racks (See Figure B 3.7.16-1) are designed and shall be maintained with:
 - a. Fuel assemblies having maximum nominal planar average U-235 enrichment of 4.60 weight percent;
 - Keff < 1.0 if fully flooded with unborated water, which includes allowances for uncertainties as described in Section 9.11 of the FSAR.
 - c. Keff ≤ 0.95 if fully flooded with water borated to 850 ppm, which includes allowance for uncertainties as described in Section 9.11 of the FSAR.
 - d. A nominal 9.17 inch center to center distance between fuel assemblies; and

4.3.1 <u>Criticality</u> (continued)

Irradiated

e. New or irradiated fuel assemblies which meet the maximum nominal planar average U-235 enrichment, burnup, and decay time requirements of Table 3.7.16-1.

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

(Deleted)

Twenty four unirradiated fuel assemblies having a maximum nominal planar average U 235 enrichment of 4.95 weight percent, and stored in accordance with the pattern shown in Figure 4.3 1, or

Thirty six unirradiated fuel assemblies having a maximum nominal planar average U 235 enrichment of 4.05 weight percent, and stored in accordance with the pattern shown in Figure 4.3 1;

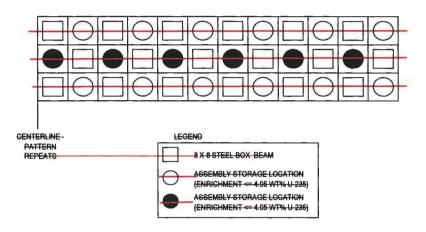
- Keff ≤ 0.95 when flooded with either full density or low density (optimum moderation) water including allowances for uncertainties as described in Section 9.11 of the FSAR.
- e. The pitch of the new fuel storage rack lattice being ≥ 9.375 inches and every other position in the lattice being permanently occupied by an 8" x 8" structural steel or core plugs, resulting in a nominal 13.26 inch center to center distance between fuel assemblies placed in alternating storage locations.

4.3.2 Drainage

The spent fuel storage pool cooling system suction and discharge piping is designed and shall be maintained to prevent inadvertent draining of the pool below elevation 644 ft 5 inches.

4.3.3 Capacity

The spent fuel storage pool and north tilt pit are designed and shall be maintained with a storage capacity limited to no more than 892 fuel assemblies.



Note: If any assemblies containing fuel enrichments greater than 4.05% U 235 are stored in the New Fuel Storage Rack, the center row must remain empty.

Figure 4.3 1 (page 1 of 1)
New Fuel Storage Rack Arrangement

5.5.2

Primary Coolant Sources Outside Containment

(Deleted)

This program provides controls to minimize leakage to the engineered safeguards rooms, from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident, to as low as practical. The systems include the Containment Spray System, the Safety Injection System, the Shutdown Cooling System, and the containment sump suction piping. This program shall include the following:

- a. Provisions establishing preventive maintenance and periodic visual inspection requirements, and
- b. Integrated leak test requirements for each system at a frequency not to exceed refueling cycle intervals.
- c. The portion of the shutdown cooling system that is outside the containment shall be tested either by use in normal operation or hydrostatically tested at 255 psig.
- d. Piping from valves CV 3029 and CV 3030 to the discharge of the safety injection pumps and containment spray pumps shall be hydrostatically tested at no less than 100 psig.
- e. The maximum allowable leakage from the recirculation heat removal systems' components (which include valve stems, flanges and pump seals) shall not exceed 0.2 gallon per minute under the normal hydrostatic head from the SIRW tank.

5.5.3

Post Accident Sampling Program

[deleted]

(Deleted)

5.5.5

Containment Structural Integrity Surveillance Program

(Deleted)

This program provides controls for monitoring any tendon degradation in pre-stressed concrete containments, including effectiveness of its corrosion protection medium, to ensure containment structural integrity. The program shall include baseline measurements prior to initial operations. The Containment Structural Integrity Surveillance Program, inspection frequencies, and acceptance criteria shall be in accordance with ASME Boiler and Pressure Vessel Code, Section XI, Subsection IWE and IWL.

If, as a result of a tendon inspection, corrective retensioning of five percent (8) or more of the total number of dome tendons is necessary to restore their lifteff forces to within the limits, a dome delamination inspection shall be performed within 90 days following such corrective retensioning. The results of this inspection shall be reported to the NRC in accordance with Specification 5.6.7, "Containment Structural Integrity Surveillance Report."

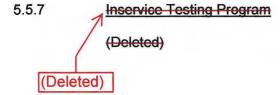
The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Containment Structural Integrity Surveillance Program inspection frequencies.

5.5.6

(Deleted)

Primary Coolant Pump Flywheel Surveillance Program

- a. Surveillance of the primary coolant pump flywheels shall consist of a 100% volumetric inspection of the upper flywheels each 10 years.
- b. The provisions of SR 3.0.2 are not applicable to the Flywheel Testing Program.



Steam Generator (SG) Program

(Deleted)

5.5.8

A Steam Generator Program shall be established and implemented to ensure that SG tube integrity is maintained. In addition, the Steam Generator Program shall include the following provisions:

- a. Previsions for condition monitoring assessments. Condition monitoring assessment means an evaluation of the "as found" condition of the tubing with respect to the performance criteria for structural integrity and accident induced leakage. The "as found" condition refers to the condition of the tubing during an SG inspection outage, as determined from the inservice inspection results or by other means, prior to the plugging of tubes. Condition monitoring assessments shall be conducted during each outage during which the SG tubes are inspected or plugged to confirm that the performance criteria are being met.
- b. Performance criteria for SG tube integrity. SG tube integrity shall be maintained by meeting the performance criteria for tube structural integrity, accident induced leakage, and operational LEAKAGE.

5.5.8 Steam Generator (SG) Program

- b. Performance criteria for SG tube integrity. (continued)
 - Structural integrity performance criterion: All in service SG tubes 4. shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cool down and all anticipated transients included in the design specification) and design basis accidents. This includes retaining a safety factor of 3.0 against burst under normal steady state full power operation primary to secondary pressure differential and a safety factor of 1.4 against burst applied to the design basis accident primary to secondary pressure differentials. Apart from the above requirements, additional leading conditions associated with the design basis accidents, or combination of accidents in accordance with the design and licensing basis, shall also be evaluated to determine if the associated loads contribute significantly to burst or collapse. In the assessment of tube integrity, those loads that do significantly affect burst or collapse shall be determined and assessed in combination with the loads due to pressure with a safety factor of 1.2 on the combined primary loads and 1.0 on axial secondary loads.
 - Accident induced leakage performance criterion: The primary to secondary accident induced leakage rate for any design basis accident, other than a SG tube rupture, shall not exceed the leakage rate assumed in the accident analysis in terms of total leakage rate for all SGs and leakage rate for an individual SG. Leakage is not to exceed 0.3 gpm.
 - 3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "PCS Operational LEAKAGE."
- e. Provisions for SG tube repair criteria. Tubes found by inservice inspection to contain flaws with a depth equal to or exceeding 40% of the nominal tube wall thickness shall be plugged. The following alternative repair criteria shall be applied as an alternate to the 40% depth based criteria:
 - Tubes found by inservice inspection to contain service induced flaws within 12.5 inches below the bettern of the hot leg expansion transition or top of the hot leg tubesheet, whichever is lower, shall be plugged. Flaws located below this elevation may remain in service:

1

5.5.8 Steam Generator (SG) Program

- e. Provisions for SG tube repair criteria. (continued)
 - 2. Tubes found by inservice inspection to contain service induced flaws within 13.67 inches below the bottom of the cold leg expansion transition or top of the cold leg tubesheet, whichever is lower, shall be plugged. Flaws located below this elevation may remain in service.
- d. Provisions for SG tube inspections. Periodic SG tube inspections shall be performed. The number and portions of the tubes inspected and methods of inspection shall be performed with the objective of detecting flaws of any type (e.g., volumetric flaws, axial and circumferential cracks) that may be present along the length of the tube, from 12.5 inches below the bottom of the hot leg expansion transition or top of the hot leg tubesheet, whichever is lower, to 13.67 inches below the bottom of the cold leg expansion transition or top of the cold leg tubesheet, whichever is lower, and that may satisfy the applicable tube repair criteria. The tube to tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, d.3, and d.4 below, the inspection scope, inspection methods, and inspection intervals shall be such as to ensure that SG tube integrity is maintained until the next SG inspection. An assessment of degradation shall be performed to determine the type and location of flaws to which the tubes may be susceptible and, based on this assessment, to determine which inspection methods need to be employed and at what locations.
 - Inspect 100% of the tubes in each SG during the first refueling outage following SG replacement.
 - 2. Inspect 100% of the tubes at sequential periods of 60 effective full power months. The first sequential period shall be considered to begin after the first inservice inspection of the SGs. No SG shall operate for more than 24 effective full power months or one refueling outage (whichever is less) without being inspected.
 - 3. If crack indications are found in any SG tube from 12.5 inches below the bottom of the hot leg expansion transition or top of the hot leg tubesheet, whichever is lower, to 13.67 inches below the bottom of the cold leg expansion transition or top of the cold leg tubesheet, whichever is lower, then the next inspection for each SG for the degradation mechanism that caused the crack indication shall not exceed 24 effective full power months or one

5.5.8 Steam Generator (SG) Program

d. Provisions for SG tube inspections. (continued)

refueling outage (whichever is less). If definitive information, such as from examination of a pulled tube, diagnostic non destructive testing, or engineering evaluation indicates that a crack like indication is not associated with a crack(s), then the indication need not be treated as a crack.

- 4. When the alternate repair criteria of TS 5.5.8c.1 are implemented, inspect 100% of the inservice tubes to the hot leg tubesheet region with the objective of detecting flaws that may satisfy the applicable tube repair criteria of TS 5.5.8c.1 every 24 effective full power months, or one refueling outage, whichever is less.
- e. Provisions for monitoring operational primary to secondary LEAKAGE.

5.5 Programs and Manuals

5.5.9

Secondary Water Chemistry Program

(Deleted)

A program shall be established, implemented and maintained for monitoring of secondary water chemistry to inhibit steam generator tube degradation and shall include:

- Identification of a sampling schedule for the critical variables and control a. points for these variables,
- Identification of the procedures used to measure the values of the critical b. variables.
- Identification of process sampling points, which shall include monitoring 0: the discharge of the condensate pumps for evidence of condenser in leakage,
- Procedures for the recording and management of data. d.
- Procedures defining corrective actions for all off control point chemistry e. conditions, and
- £ A procedure identifying (a) the authority responsible for the interpretation of the data, and (b) the sequence and timing of administrative events required to initiate corrective actions.

(Deleted)

5.5.10 Ventilation Filter Testing Program

A program shall be established to implement the following required testing of Control Room Ventilation (CRV) and Fuel Handling Area Ventilation (FHAV) systems at the frequencies specified in Regulatory Guide 1.52, Revision 2 (RG 1.52), and in accordance with RG 1.52 and ASME N510 1989, at the system flowrates and tolerances specified below*:

Demonstrate for each of the ventilation systems that an inplace test of the a. High Efficiency Particulate Air (HEPA) filters shows a penetration and system bypass < 0.05% for the CRV system and < 1.00% for the FHAV system when tested in accordance with RG 1.52 and ASME N510 1989:

Ventilation System FHAV (single fan operation) FHAV (dual fan operation) CRY

Flowrate (CFM) 7300 ± 20% 10.000 ± 20% 3,200 +10% 5%

5.5.10 <u>Ventilation Filter Testing Program</u> (continued)

b. Demonstrate for each of the ventilation systems that an inplace test of the charcoal adsorber shows a penetration and system bypass < 0.05% for the CRV system and < 1.00% for the FHAV system when tested in accordance with RG 1.52 and ASME N610 1989.

Ventilation System
FHAV (dual fan operation)
CRV

Flowrate (CFM) 10,000 ± 20% 3200 +10% 5%

e. Demonstrate for each of the ventilation systems that a laboratory test of a sample of the charcoal adsorber, when obtained as described in RG 1.52 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 equal to the relative humidity specified as follows:

Ventilation System	Penetration	Relative Humidity
FHAV	6.00%	95%
CRV	0.157%	70%

d. For each of the ventilation systems, demonstrate 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 RG 1.52 and ASME N510 1989:

Ventilation System	Delta P (In H ₂ 0)	Flowrate (CFM)
FHAV (dual fan operation)	6.0	10,000 ± 20%
CRV	8.0	3200 +10% 5%

e. Demonstrate that the heaters for the CRV system dissipates the following specified value ± 20% when tested in accordance with ASME N510 1989:

Ventilation System	Wattage
CRV	15 kW

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Ventilation Filter Testing Program frequencies.

Should the 720 hour limitation on charcoal adsorber operation occur during a plant operation requiring the use of the charcoal adsorber—such as refueling—testing may be delayed until the completion of the plant operation or up to 1,500 hours of filter operation; whichever occurs first.

5.5.11

Fuel Oil Testing Program

(Deleted)

A 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 requirements, testing requirements, and acceptance criteria, based on the diesel manufacturer's specifications and applicable ASTM Standards. The program shall establish the following:

- a. Acceptability of new fuel oil prior to addition to the Fuel Oil Storage Tank, and acceptability of fuel oil stored in the Fuel Oil Storage Tank, by determining that the fuel oil has the following properties within limits:
 - 1. API gravity or an absolute specific gravity,
 - 2. Kinematic viscosity, and
 - 3. Water and sediment content.
- Other properties of fuel oil stored in the Fuel Oil Storage Tank, specified by the diesel manufacturers or specified for grade 2D fuel oil in ASTM D 975, are within limits.

The previsions of SR 3.0.2 and SR 3.0.3 are applicable to the Fuel Oil Testing Program.

5.5.12 Technical Specifications (TS) Bases Control Program

This program provides a means for processing changes to the Bases of these Technical Specifications.

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews.
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
 - 1. A change in the TS incorporated in the license; or
 - 2. A change to the updated FSAR or Bases that requires NRC approval pursuant to 10 CFR 50.59.

5.5.12 <u>Technical Specifications (TS) Bases Control Program</u> (continued)

- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the FSAR.
- d. Proposed changes that meet the criteria of Specification 5.5.12.b. above shall be reviewed and approved by the NRC prior to implementation.
 Changes to the Bases implemented without prior NRC approval shall be provided to the NRC on a frequency consistent with 10 CFR 50.71(e).

5.5.13

Safety Functions Determination Program (SFDP)

(Deleted)

This program ensures loss of safety function is detected and appropriate actions taken. Upon entry into LCO 3.0.6, an evaluation shall be made to determine if loss of safety function exists. Additionally, other appropriate limitations and remedial or compensatory actions may be identified to be taken as a result of the support system inoperability and corresponding exception to entering supported system Condition and Required Actions. This program implements the requirements of LCO 3.0.6. The SFDP shall contain the following:

- Provisions for cross train checks to ensure a loss of the capability to perform the safety function assumed in the accident analysis does not go undetected;
- b. Provisions for ensuring the plant is maintained in a safe condition if a loss of function condition exists;
- e. Provisions to ensure that an inoperable supported system's Completion
 Time is not inappropriately extended as a result of multiple support
 system inoperabilities; and
- d. Other appropriate limitations and remedial or compensatory actions.

A loss of safety function exists when, assuming no concurrent single failure, no concurrent loss of offsite power or no concurrent loss of onsite diesel generator(s), a safety function assumed in the accident analysis cannot be performed. For the purpose of this program, a loss of safety function may exist when a support system is inoperable, and:

- A required system redundant to system(s) supported by the inoperable support system is also inoperable; or
- A required system redundant to system(s) in turn supported by the inoperable supported system is also inoperable; or

5.5.13 <u>Safety Functions Determination Program (SFDP)</u> (continued)

e. 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. When a loss of safety function is caused by the inoperability of a single Technical Specification support system, the appropriate Conditions and Required Actions to enter are those of the support system.

5.5.14

Containment Leak Rate Testing Program

(Deleted)

- A program shall establish the leakage rate testing of the containment as required by 10 CFR 50.54(c) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with NEI 94 01, Revision 2 A, "Industry Guideline for Implementing Performance Based Option of 10 CFR Part 50, Appendix J," dated October 2008, with the following exceptions:
 - Leakage rate testing is not necessary after opening the Emergency Escape Air Lock doors for post test restoration or post test adjustment of the air lock door seals. However, a seal contact check shall be performed instead.
 - Emergency Escape Airlock door opening, solely for the purpose of strongback removal and performance of the seal contact check, does not necessitate additional pressure testing.
 - Leakage rate testing at P_a is not necessary after adjustment of the Personnel Air Lock door seals. However, a between the seals test shall be performed at ≥10 psig instead.
 - Leakage rate testing frequency for the Containment 4 inch purge exhaust valves, the 8 inch purge exhaust valves, and the 12 inch air room supply valves may be extended up to 60 months based on component performance.
- b. The calculated peak containment internal pressure for the design basis loss of coolant accident, P_a, is 54.2 psig. The containment design pressure is 55 psig.
- 6. The maximum allowable containment leakage rate, La, at Pa, shall be 0.1% of containment air weight per day.

5.5 Programs and Manuals

5.5.14 <u>Containment Leak Rate Testing Program</u> (continued)

- d. Leakage rate acceptance criteria are:
 - Containment leakage rate acceptance criteria is ≤ 1.0 L_a. During the first plant startup following testing in accordance with this program, the leakage rate acceptance criteria are < 0.60 L_a for the Type B and Type C tests and ≤ 0.75 L_a for Type A tests.
 - Air lock testing acceptance criteria are:
 - a) Overall air lock leakage is ≤ 1.0 L_a when tested at ≥ P_a and combined with all penetrations and valves subjected to Type B and C tests. However, during the first unit startup following testing performed in accordance with this program, the leakage rate acceptance criteria is < 0.6 L_a when combined with all penetrations and valves subjected to Type B and C tests.
 - b) For each Personnel Air Lock door, leakage is ≤ 0.023 L₂ when pressurized to ≥ 10 psig.
 - e) For each Emergency Escape Air Lock door, a seal contact check, consisting of a verification of continuous contact between the seals and the sealing surfaces, is acceptable.
- e. "Containment OPERABILITY" is equivalent to "Containment Integrity" for the purposes of the testing requirements.
- f. The provisions of SR 3.0.3 <u>are</u> applicable to the Containment Leak Rate Testing Program requirements.
- g. Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J.

5.5 Programs and Manuals

5.5.16

Control Room Envelope Habitability Program

(Deleted)

A Control Room Envelope (CRE) Habitability Program shall be established and implemented to ensure that CRE habitability is maintained such that, with an OPERABLE Control Room Ventilation (CRV) Filtration, CRE occupants can control the reactor safely under normal conditions and maintain it in a safe condition following a radiological event, hazardous chemical release, or a smoke challenge. The program shall ensure that adequate radiation protection is provided to permit access and occupancy of the CRE under design basis accident (DBA) conditions without personnel receiving radiation exposures in excess of 5 rem whole body or its equivalent to any part of the body for the duration of the accident. The program shall include the following elements:

- a. The definition of the CRE and the CRE boundary.
- b. Requirements for maintaining the CRE boundary in its design condition including configuration control and preventive maintenance.
- e. Requirements for (i) determining the unfiltered air inleakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.
- d. Measurement, at designated locations, of the CRE pressure relative to all external areas adjacent to the CRE boundary during the pressurization mode of operation by one train of the CRV Filtration, operating at the flow rate required by the Ventilation Filter Testing Program, at a Frequency of 18 months on a STAGGERED TEST BASIS. The results shall be trended and used as part of the 18 month assessment of the CRE boundary.
- e. The quantitative limits on unfiltered air inleakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered air inleakage measured by the testing described in paragraph c. The unfiltered air inleakage limit for radiological challenges is the inleakage flow rate assumed in the licensing basis analyses of DBA consequences. Unfiltered air inleakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions in the licensing basis.
- f. The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability, determining CRE unfiltered inleakage, and measuring CRE pressure and assessing the CRE boundary as required by paragraphs c and d, respectively.

5.5.17

Surveillance Frequency Control Program

Deleted

This program provides controls for Surveillance Frequencies. The program shall ensure that Surveillance Requirements specified in the Technical Specifications are performed at intervals sufficient to assure the associated Limiting Conditions for Operation are met.

- a. The Surveillance Frequency Control Program shall contain a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.
- b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04 10, "Risk Informed Method for Control of Surveillance Frequencies," Revision 1.
- e. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program.

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5.0 ADMINISTRATIVE CONTROLS

5.6 Reporting Requirements

The following reports shall be submitted in accordance with 10 CFR 50.4.

5.6.1 (Deleted)

5.6.2 Radiological Environmental Operating Report

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The Radiological Environmental Operating Report covering the operation of the plant during the previous calendar year shall be submitted before May 15 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual and in 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

5.6.3 Radioactive Effluent Release Report

The Radioactive Effluent Release Report covering operation of the plant in the previous year shall be submitted prior to May 1 of each year in accordance with 10 CFR 50.36a. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the plant. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual and Process Control Program, and shall be in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

5.6 Reporting Requirements

5.6.4 (Deleted)

5.6.5

CORE OPERATING LIMITS REPORT (COLR)

(Deleted)

a. Core operating limits shall be established prior to each reload cycle, or prior to any remaining portion of a reload cycle, and shall be documented in the COLR for the following:

3.1.1	Shutdown Margin
3.1.6	Regulating Rod Group Position Limits
3.2.1	Linear Heat Rate Limits
3.2.2	Radial Peaking Factor Limits
3.2.4	ASI Limits
3.4.1	DNB Limits

- b. The analytical methods used to determine the core operating limits shall be those approved by the NRC, specifically those described in the latest approved revision of the following documents:
 - 1. EMF 96 029(P)(A) Volumes 1 and 2, "Reactor Analysis System for PWRs," Siemens Power Corporation. (LCOs 3.1.1, 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
 - 2. ANF 84 73 Appendix B (P)(A), "Advanced Nuclear Fuels
 Methodology for Pressurized Water Reactors: Analysis of Chapter
 15 Events," Advanced Nuclear Fuels Corporation. (Bases report
 not approved) (LCOs 3.1.1, 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
 - 3. XN NF 82 21(P)(A), "Application of Exxon Nuclear Company PWR Thermal Margin Methodology to Mixed Core Configurations," Exxon Nuclear Company. (LCOs 3.2.1, 3.2.2, & 3.2.4)
 - 4. EMF-84-093(P)(A), "Steam Line Break Methodology for PWRs, "Siemens Power Corporation. (LCOs 3.1.1, 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
 - 5. XN 75 32(P)(A) Supplements 1 through 4, "Computational Procedure for Evaluating Fuel Rod Bowing," Exxon Nuclear Company. (Bases document not approved) (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)

5.6.5 <u>COLR</u> (continued)

- 6. EMF 2310 (P)(A), Revision 0, Framatome ANP, Inc., May 2001, "SRP Chapter 15 Non LOCA Methodology for Pressurized Water Reactors." (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
- 7. XN NF 78 44(NP)(A), "A Generic Analysis of the Control Rod Ejection Transient for Pressurized Water Reactors," Exxon Nuclear Company. (LCOs 3.1.6, 3.2.1, & 3.2.2)
- 8. ANF-89 151(P)(A), "ANF-RELAP Methodology for Pressurized Water Reactors: Analysis of Non-LOCA Chapter 15 Events," Advanced Nuclear Fuels Corporation. (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
- 9. EMF-92-153(P)(A) and Supplement 1, "HTP: Departure from Nucleate Boiling Correlation for High Thermal Performance Fuel," Siemens Power Corporation. (LCOs 3.2.1, 3.2.2, & 3.2.4)
- 10. XN NF 621(P)(A), "Exxon Nuclear DNB Correlation for PWR Fuel Designs," Exxon Nuclear Company. (LCOs 3.2.1, 3.2.2, & 3.2.4)
- 11. XN NF 82 06(P)(A) and Supplements 2, 4, and 5, "Qualification of Exxon Nuclear Fuel for Extended Burnup," Exxon Nuclear Company. (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
- 12. ANF 88 133(P)(A) and Supplement 1, "Qualification of Advanced Nuclear Fuels' PWR Design Methodology for Rod Burnups of 62 GWD/MTU," Advanced Nuclear Fuels Corporation. (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
- 13. XN NF 85 92(P)(A), "Exxon Nuclear Uranium Dioxide/Gadolinia Irradiation Examination and Thermal Conductivity Results," Exxon Nuclear Company. (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)

5.6.5 COLR (continued)

- 14. EMF 92 116(P)(A), "Generic Mechanical Design Criteria for PWR Fuel Designs," Siemens Power Corporation. (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
- 45-EMF 2087(P)(A), "SEM/PWR 98; ECCS Evaluation Model for PWR LBLOCA Applications," Siemens Power Corporation. (LCOs 3.1.6, 3.2.1, & 3.2.2)
- ANF 87 150 Volume 2. "Palisades Modified Reactor Protection 16. System Report: Analysis of Chapter 15 Events," Advanced Nuclear Fuels Corporation. [Approved for use in the Palisades design during the NRC review of license Amendment 118, November 15, 1988] (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.4.1)
- EMF 1961(P)(A), Revision 0, Siemens Power Corporation, July 17 2000, "Statistical Setpoint/Transient Methodology for Combustion Engineering Type Reactors." (LCOs 3.1.6, 3.2.1, 3.2.2, 3.2.4, & 3.4.1)
- 18. EMF 2328 (P)(A), Revision 0, Framatome ANP, Inc., March 2001, "PWR Small Break LOCA Evaluation Model, S RELAP5 Based." (LCOs 3.1.6, 3.2.1, & 3.2.2)
- 19. BAW 2489P, "Revised Fuel Assembly Growth Correlation for Palisades." (LCOs 3.1.6, 3.2.1, 3.2.2, & 3.2.4)
- 20. EMF 2103(P)(A), "Realistic Large Break LOCA Methodology for Pressurized Water Reactors." (LCOs 3.1.6, 3.2.1, & 3.2.2)
- BAW 10240(P) A, "Incorporation of M5 Properties in Framatome 21. ANP Approved Methods." (LCOs 3.1.6, 3.2.1, 3.2.2, 3.2.4, & 3.4.1)
- The core operating limits shall be determined such that all applicable 6. limits (e.g., fuel thermal mechanical limits, core thermal hydraulic limits, Emergency Core Cooling Systems limits, nuclear limits such as shutdown margin, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- The COLR, including any mid cycle revisions or supplements, shall be dprovided, upon issuance for each reload cycle, to the NRC.

5.6 Reporting Requirements

5.6.6

Post Accident Monitoring Report

(Deleted)

When a report is required by LCO 3.3.7, "Post Accident Monitoring Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels to OPERABLE status.

5.6.7

Containment Structural Integrity Surveillance Report

(Deleted)

Reports shall be submitted to the NRC covering Prestressing, Anchorage, and Dome Delamination tests within 90 days after completion of the tests.

5.6.8

Steam Generator Tube Inspection Report

(Deleted)

A report shall be submitted within 180 days after the initial entry into MODE 4 following completion of an inspection performed in accordance with the Specification 5.5.8, Steam Generator (SG) Program. The report shall include:

- a. The scope of inspections performed on each SG,
- b. Active degradation mechanisms found,
- e. Nondestructive examination techniques utilized for each degradation mechanism.
- d. Location, orientation (if linear), and measured sizes (if available) of service induced indications,
- Number of tubes plugged during the inspection outage for each active degradation mechanism,
- f. Total number and percentage of tubes plugged to date,
- The results of condition monitoring, including the results of tube pulls and in situ testing, and
- h. The effective plugging percentage for all plugging in each SG.
- i. The results of monitoring for tube axial displacement (slippage). If slippage is discovered, the implications of the discovery and corrective action shall be provided.

PALISADES PLANT

RENEWED FACILITY OPERATING LICENSE DPR-20

APPENDIX B

ENVIRONMENTAL PROTECTION PLAN (NON-RADIOLOGICAL)

PALISADES PLANT

ENVIRONMENTAL PROTECTION PLAN

(NON-RADIOLOGICAL)

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1.0 Objectives of the Environmental Protection Plan

The Environmental Protection Plan (EPP) is to provide for protection of environmental values during construction and operation of the nuclear facility.

The principal objectives of the EPP are as follows:

handling and storage of spent fuel and maintenance

- (1) Verify that the plant is operated in an environmentally acceptable manner, as established by the FES and other NRC environmental impact assessments.
- (2) Coordinate NRC requirements and maintain consistency with other Federal, State and local requirements for environmental protection.
- (3) Keep NRC informed of the environmental effects of facility construction

 and operation and of actions taken to control those effects.

 handling and storage of spent fuel and maintenance of the

Environmental concerns identified in the FES which relate to water quality matters are regulated by way of the licensee's NPDES permit.

2.0 Environmental Protection Issues

In the final addendum to the FES-OL dated February 1978 the staff considered the environmental impacts associated with the operation of the Palisades Plant. Certain environmental issues were identified which required study or license conditions to resolve environmental concerns and to assure adequate protection of the environment.

2.1 Aquatic Issues

Specific aquatic issues raised by the staff in the FES-OL were:

The need for aquatic monitoring programs to confirm that thermal mixing occurs as predicted, that chlorine releases are controlled within those discharge concentrations evaluated, and that effects on aquatic biota and water quality due to plant operation are no greater than predicted.

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Aquatic issues are addressed by the effluent limitations, and monitoring requirements are contained in the effective NPDES permit issued by the State of Michigan, Department of Natural Resources. The NRC will rely on this agency for regulation of matters involving water quality and aquatic biota.

2.2 Terrestrial Issues

1. Potential impacts on the terrestrial environment associated with drift from the mechanical draft cooling towers. (FES-OL addendum Section 6.3)

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- 3.0 Consistency Requirements
- Plant Design and Operation 3.1

facility The licensee may make changes in station design or operation or perform tests or experiments affecting the environment provided such changes, tests or experiments do not involve an unreviewed environmental question, and do not involve a change in the Environmental Protection Plan. Changes in plant design

environment are not subject to the requirements of this EPP. Activities governed by Section 3.3 are not subject to the requirements of this section.

or operation or performance of tests or experiments which do not affect the

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Before engaging in additional construction or operational activities which may affect the environment, the licensee shall prepare and record an environmental evaluation of such activity. When the evaluation indicates that such activity involves an unreviewed environmental question, the licensee shall provide a written evaluation of such activities and obtain prior approval from the Director, Office of Nuclear Reactor Regulation. When such activity involves a change in the Environmental Protection Plan, such activity and change to the Environmental Protection Plan may be implemented only in accordance with an appropriate license amendment as set forth in Section 5.3.

A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental statement (FES) as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements to the FES, environmental impact appraisals, or in any decisions of the Atomic Safety and Licensing

Board; or (2) a significant change in effluents or power level [in accordance with 10 CFR Part 51.5(b)(2)] or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this Subsection, which may have a significant adverse environmental impact.

The licensee shall maintain records of changes in facility design or operation and of tests and experiments carried out pursuant to this Subsection. These records shall include a written evaluation which provide bases for the determination that the change, test, or experiment does not involve an unreviewed environmental question nor constitute a decrease in the effectiveness of this EPP to meet the objectives specified in Section 1.0. The licensee shall include as part of his Annual Environmental Operating Report (per Subsection 5.4.1) brief descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.

3.2 Reporting Related to the NPDES Permits and State Certifications

Violations of the NPDES Permit or the State certification (pursuant to Section 401 of the Clean Mater Act) shall be reported to the NRC by submittal of copies of the reports required by the NPDES Permit or certification.

Changes and additions to the NPDES Permit or the State certification shall be reported to the NRC within 30 days following the date the change is approved. If a permit or certification, in part or in its entirety, is appealed and stayed, the NRC shall be notified within 30 days following the date the stay is granted.

The NRC shall be notified of changes to the effective NPDES Permit proposed by the licensee by providing NRC with a copy of the proposed change at the same time it is submitted to the permitting agency. The notification of a licensee-initiated change shall include a copy of the requested revision submitted to the permitting agency. The licensee shall provide the NRC a copy of the application for renewal of the NPDES permit at the same time the application is submitted to the permitting agency.

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3.3 Changes Required for Compliance with Other Environmental Regulations
Changes in plant design or operation and performance of tests or experiments
which are required to achieve compliance with other Federal, State, or local
environmental regulations are not subject to the requirements of Section 3.1.

4.0 Environmental Conditions

4.1 Unusual or Important Environmental Events

the handling and storage of spent fuel and maintenance of the facility

Any occurrence of an unusual or important event that indicates or could result in significant environmental impact causally related to plant operation shall be recorded and promptly reported to the NRC within 24 hours by telephone, telegraph, or facsimile transmissions followed by a written report per Subsection 5.4.2. The following are examples: excessive bird impaction events, onsite plant or animal disease outbreaks, mortality or unusual occurrence of any species protected by the Endangered Species Act of 1973, fish kills, increase in nuisance organisms or conditions and unanticipated or emergency discharge of waste water or chemical substances.

No routine monitoring programs are required to implement this condition.

4.2 Environmental Monitoring

4.2.1 Meteorological Monitoring

A meteorological monitoring program shall be conducted in the vicinity of the plant site for at least two years after conversion to cooling towers to document effects of cooling tower operation on meteorological variables. Data on the following meteorological variables shall be obtained from the station network shown in Figure 4.2.1: precipitation, temperature, humidity, solar radiation, downcoming radiation, visibility, wind direction and wind speed. In addition, studies shall be conducted for at least two years to measure affects of cooling tower drift on vegetation by associated salt deposition, icing or other causes.

5.0 Administrative Procedures

5.1 Review and Audit

The licensee shall provide for review and audit of compliance with the Environmental Protection Plan. The audits shall be conducted independently of the individual or groups responsible for performing the specific activity. A description of the organization structure utilized to achieve the independent review and audit function and results of the audit activities shall be maintained and made available for inspection.

5.2 Records Retention

Records and logs relative to the environmental aspects of plant operation shall be made and retained in a manner convenient for review and inspection.

These records and logs shall be made available to NRC on request.

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Records of modifications to plant structures, systems and components determined to potentially affect the continued protection of the environment shall be retained for the life of the plant. All other records, data and logs relating to this EPP shall be retained for five years or, where applicable, in accordance with the requirements of other agencies.

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and storage of

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5.3 Changes in Environmental Protection Plan

Request for change in the Environmental Protection Plan shall include an assessment of the environmental impact of the proposed change and a supporting justification. Implementation of such changes in the EPP shall not commence prior to NRC approval of the proposed changes in the form of a license amendment incorporating the appropriate revision to the Environmental Protection Plan.

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5.4 Plant Reporting Requirements

5.4.1 Routine Reports

An Annual Environmental Operating Report describing implementation of this EPP for the previous year shall be submitted to the NRC prior to May 1 of each year. The initial report shall be submitted prior to May 1 of the year following issuance of the operating license. The period of the first report shall begin with the date of issuance of the operating license.

The report shall include summaries and analyses of the results of the environmental protection activities required by Subsection 4.2 of this Environmental Protection Plan for the report period, including a comparison with preoperational studies, operational controls (as appropriate), and previous nonradiological environmental monitoring reports, and an assessment of the observed impacts of the plant operation on the environment. If harmful effects or evidence of trends towards irreversible damage to the environment are observed, the licensee shall provide a detailed analysis of the data and a proposed course of action to alleviate the problem.

The Annual Environmental Operating Report shall also include:

- (a) A list of EPP noncompliances and the corrective actions taken to remedy them.
- (b) A list of all changes in station design or operation, tests, and experiments made in accordance with Subsection 3.1 which involved a potentially significant unreviewed environmental issue.
- (c) A list of nonroutine reports submitted in accordance with Subsection 5.4.2.

In the event that some results are not available by the report due date, the report shall be submitted noting and explaining the missing results. The missing data shall be submitted as soon as possible in a supplementary report.

5.4.2 Nonroutine Reports

A written report shall be submitted to the NRC within 30 days of occurrence of nonroutine event. The report shall (a) describe, analyze, and evaluate the event, including extent and magnitude of the impact and plant operating characteristics, (b) describe the probable cause of the event, (c) indicate the action taken to correct the reported event, (d) indicate the corrective action taken to preclude repetition of the event and to prevent similar occurrences involving similar components or systems, and (e) indicate the agencies notified and their preliminary responses.

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Events reportable under this subsection which also require reports to other Federal, State or local agencies shall be reported in accordance with those reporting requirements in lieu of the requirements of this subsection. The NRC shall be provided a copy of such report at the time it is submitted to the other agency.