

March 25, 2022

Docket Nos.: 50-321
50-366

NL-22-0010

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555-0001

Edwin I. Hatch Nuclear Plant – Units 1 & 2
Application to Revise Technical Specifications to Adopt Technical Specifications Task Force
(TSTF) Traveler TSTF-208, Revision 0,
“Extension of Time to Reach Mode 2 in LCO 3.0.3” and Administrative Correction for
Duplicate Technical Specification 3.4.10

Ladies and Gentlemen:

Pursuant to the provisions of Section 50.90 of Title 10 of the *Code of Federal Regulations*, Southern Nuclear Operating Company (SNC) hereby requests amendments to renewed facility operating licenses DPR-57 and NPF-5 to revise the Technical Specifications (TS) for the Edwin I. Hatch Nuclear Plant (HNP), Units 1 and 2, respectively.

The proposed amendments would eliminate the Limiting Condition for Operation (LCO) 3.0.3 requirement to be in Mode 2 within an allowable time limit based on the approved Technical Specifications Task Force (TSTF) Traveler TSTF-208, Revision 0, “Extension of Time to Reach Mode 2 in LCO 3.0.3.” The amendment request maintains the LCO 3.0.3 requirement to be in Mode 3 within 13 hours.

In addition, SNC requests an administrative change for deletion of a duplicate TS 3.4.10, on TS Page 3.4-25 of each unit’s TS. This duplicate TS 3.4.10 was introduced during Amendment 277 to the HNP Unit 1 TS and Amendment 221 to the HNP Unit 2 TS.

Enclosure 1 provides an evaluation of the proposed TS changes. Enclosure 2 provides the existing TS pages marked-up to show the proposed changes for Units 1 and 2. Enclosure 3 provides revised (i.e., clean-typed) TS pages for Units 1 and 2. Note that no revised TS page is provided for TS Page 3.4-25 for each unit as SNC is requesting that page be deleted in its entirety. Enclosure 4 provides marked-up TS Bases pages, for information only, corresponding to the proposed changes.

Approval of the proposed amendment is requested within one year after acceptance. Once approved, the amendment will be implemented within 60 days.

This document contains no regulatory commitments.

In accordance with 10 CFR 50.91(b)(1), SNC is notifying the State of Georgia of this license amendment request by transmitting a copy of this letter and enclosure to the designated State Official.

If you have any questions regarding this submittal, please contact Ryan Joyce at 205.992.6468.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 25th day of March 2022.

Respectfully submitted,



Cheryl A. Gayheart
Regulatory Affairs Director
Southern Nuclear Operating Company

CAG/tle

Enclosures: 1. Basis for Proposed Change
2. HNP Units 1 and 2 Technical Specifications Marked-Up Pages
3. HNP Units 1 and 2 Revised Technical Specifications Pages
4. HNP Units 1 and 2 Technical Specifications Bases Marked-Up Pages
(For Information Only)

cc: Regional Administrator, Region II
NRR Project Manager – Hatch
Senior Resident Inspector – Hatch
Director, Environmental Protection Division – State of Georgia
RType: CHA02.004

**Edwin I. Hatch Nuclear Plant – Units 1 & 2
Application to Revise Technical Specifications to Adopt Technical Specifications
Task Force (TSTF) Traveler TSTF-208, Revision 0,
“Extension of Time to Reach Mode 2 in LCO 3.0.3” and Administrative Correction
for Duplicate Technical Specification 3.4.10**

Enclosure 1

Basis for Proposed Change

1.0 Summary Description

In accordance with 10 CFR 50.90, "Application for amendment of license, construction permit, or early site permit," Southern Nuclear Operating Company (SNC) requests amendments to renewed facility operating licenses DPR-57 and NPF-5 for Edwin I. Hatch Nuclear Plant (HNP) Units 1 and 2, respectively. Consistent with the logic in approved Technical Specifications Task Force (TSTF) Traveler TSTF-208, Revision 0, "Extension of Time to Reach Mode 2 in LCO 3.0.3," the proposed amendments would eliminate the Technical Specification (TS) Limiting Condition for Operation (LCO) 3.0.3 requirement to be in Mode 2 within an allowable time limit.

2.0 Detailed Description

2.1 TSTF-208 and LCO 3.0.3 Bases

The TS Bases states LCO 3.0.3 establishes the actions that must be implemented when an LCO is not met and either an associated Required Action and Completion Time is not met and no other Condition applies, or the condition of the unit is not specifically addressed by the associated Actions. This specification delineates the time limits for placing the unit in a safe mode or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its Actions. LCO 3.0.3 allows one hour for the preparation of an orderly shutdown before initiating actions to place an affected unit in the appropriate Mode.

In accordance with TSTF-208, Revision 0, it has been determined that older Boiling Water Reactors (BWRs) can take longer than the available six hours to reach conditions where the plant can be placed in Mode 2. The intent of LCO 3.0.3 is to perform a controlled shutdown over that time period. This ensures that the unit shutdown would be completed in a prompt manner while not unduly increasing the likelihood of plant transients. However, experience at several older BWR plants has shown that six hours is not enough time to perform the intended controlled shutdown. It is also noted that during controlled, orderly shutdowns, HNP typically powers down from Mode 1 directly to Mode 3, bypassing Mode 2. SNC, in accordance with the logic of TSTF-208, is requesting to eliminate the requirement to be in Mode 2 within 7 hours. This request does not change any of the other Mode time frame requirements contained in LCO 3.0.3.

2.2 Current Technical Specifications Requirements

Current TS, per LCO 3.0.3 upon entry, requires the unit to be in Mode 2 within 7 hours; Mode 3 within 13 hours; and Mode 4 within 37 hours. These times include one hour of preparation time.

2.3 Reason for the Proposed Changes

At HNP, review of plant data indicates approximately 16 hours are typically required for an orderly, controlled shutdown to Mode 3. However, if necessary, an orderly shutdown could be performed within 12 hours, plus an additional hour to initiate action, or 13 hours total. An orderly shutdown involves lowering reactor power to 20% using control rods and

reactor recirculation pumps, and then inserting a manual scram from 20% power by placing the reactor mode switch in the Shutdown position. In accordance with TS Table 1.1-1 "MODES," Mode 3 is immediately entered with the reactor mode switch in the Shutdown position and average reactor coolant system (RCS) temperature > 212°F. Therefore, as allowed by procedure, Mode 2 is typically bypassed for an orderly shutdown at HNP. Thus, it is noted that any time requirement to enter Mode 2 is effectively a requirement to enter Mode 3 per preferred HNP orderly shutdown procedure.

Assuming one hour is provided to initiate action, 13 hours is an appropriate time for reaching Mode 3, bypassing Mode 2, in LCO 3.0.3. This change will align the TS LCO requirements with the plant's operational capabilities by allowing more time to accommodate the controlled shutdown as intended. This change is consistent with normal HNP operations to proceed to Mode 3 from Mode 1, bypassing Mode 2, for an orderly shutdown.

2.4 Description of the Proposed Changes

The proposed amendment would eliminate the LCO 3.0.3 requirement to be in Mode 2 within 7 hours based on the logic in approved TSTF-208, Revision 0, "Extension of Time to Reach Mode 2 in LCO 3.0.3." The LCO 3.0.3 requirements to be in Mode 3 and Mode 4 would then be re-lettered accordingly. The amendment would maintain the allowed time to reach Mode 3 in LCO 3.0.3 at 13 hours, including one hour to initiate action. This request also does not change the allowed time to reach Mode 4 in LCO 3.0.3 of 37 hours, nor does it make any other change to LCO 3.0.3.

Unrelated to TSTF-208, SNC requests that duplicate TS 3.4.10 be deleted from the HNP Unit 1 and Unit TS. Refer to Section 2.6.

2.5 Variations

SNC is proposing a variation from the technical specification changes described in the TSTF-208-A, Revision 0, Improved Standard Technical Specifications Change Traveler.

The Traveler states:

This change will allow extension of the time to reach Mode 2 upon entry into LCO 3.0.3 by providing brackets around the current 7 hour time. No Bases changes are necessary.

The Traveler further states:

This allowance is reasonable based on plant operating experience, the brief time period after entering MODE 2 until entering MODE 3 and considering that the total time to be in MODE 3 of 13 hours in LCO 3.0.3 has not changed. In addition, a Reviewer's Note is added to LCO 3.0.3 stating that plant specific data must be provided to justify the extension of the time to reach Mode 2.

At HNP, review of plant data indicates approximately 16 hours are typically required for an orderly, controlled shutdown to Mode 3. However, if necessary, an orderly shutdown

could be performed within 12 hours (13 hours total including one hour of preparation time). It is important that under the conditions of LCO 3.0.3 that the plant operators maintain focus on shutting the plant down in an orderly, controlled manner, allowing time to perform necessary Surveillance Requirements under the conditions. It is noted that HNP typically does not enter Mode 2 under controlled shutdown conditions and instead proceeds from Mode 1 directly to Mode 3. Thus, any extension of time required to enter Mode 2 under LCO 3.0.3 is effectively a requirement to enter Mode 3 in that time per preferred HNP orderly shutdown procedure. Following that reasoning, extending the time allowed to reach Mode 2 under LCO 3.0.3 to 13 hours, including one hour to initiate action, would have no practical effect because that would be the same time required to enter Mode 3.

Based on the above, SNC requests a variation to TSTF-208 in that instead of extending the time allowed to reach Mode 2 in LCO 3.0.3, that the requirement to reach Mode 2 within an allowable time limit be eliminated. The time allowed to reach Mode 3 under LCO 3.0.3 would be maintained at 13 hours, including one hour to initiate action. Because this request functions identically to a request to allow 13 hours to reach Mode 2, and because HNP procedures allow bypassing Mode 2 during a controlled shutdown, SNC considers this variation to be administrative in nature. Note that if HNP procedures or preferred processes are changed in the future to no longer bypass Mode 2, the plant would still be required to enter Mode 3 within 13 hours, including one hour to initiate action.

Related to this administrative variation, HNP would revise the TS Bases for LCO 3.0.3 as shown in Enclosure 4 of this request.

2.6 Administrative Corrections

Unrelated to TSTF-208, SNC requests that the following administrative corrections be made in the HNP Unit 1 and Unit 2 TS:

- a. For the HNP Unit 1 TS, deletion of an older version of TS 3.4.10 on TS Page 3.4-25 last updated with HNP Unit 1 Amendment No. 266. TS 3.4.10 was correctly updated (page number change only) with HNP Unit 1 Amendment No. 277 as shown on TS Page 3.4-22. Thus, the older version should be deleted. Deletion of TS Page 3.4-25 will not introduce a page numbering concern as it is the last page in Section 3.4.
- b. For the HNP Unit 2 TS, deletion of an older version of TS 3.4.10 on TS Page 3.4-25 last updated with HNP Unit 2 Amendment No. 210. TS 3.4.10 was correctly updated (page number change only) with HNP Unit 2 Amendment No. 221 as shown on TS Page 3.4-22. Thus, the older version should be deleted. Deletion of TS Page 3.4-25 will not introduce a page numbering concern as it is the last page in Section 3.4.

3.0 Technical Evaluation

NUREG-1433, Revision 5, BWR/4 standard technical specifications, require actions to be initiated within one hour to place the unit in Mode 2 within 7 hours when in LCO 3.0.3. Therefore, the NUREG effectively allows six hours from the start of the shutdown to reach Mode 2. The intent of this NUREG action time is to require a controlled shutdown in an expeditious, yet orderly, manner. This ensures a reactor shutdown is performed in a prompt manner while minimizing the risk of inadvertent transients that could result from undue time pressure. This is especially important since the plant, by being in LCO 3.0.3, would already be in a degraded condition.

In accordance with TSTF-208, Revision 0, it has been determined that older BWRs can take longer than the currently available six hours to reach conditions where the plant can be placed in Mode 2. HNP is a BWR/4 with 137 control rods.

At HNP, review of plant data indicates approximately 16 hours are typically required for an orderly shutdown to Mode 3. However, if necessary, an orderly shutdown could be performed within 12 hours (13 hours total including one hour of preparation time). An orderly shutdown involves lowering reactor power to 20% using control rods and reactor recirculation pumps, and then inserting a manual scram from 20% power by placing the reactor mode switch in the Shutdown position. In accordance with TS Table 1.1-1 "MODES," Mode 3 is immediately entered with the reactor mode switch in the Shutdown position and average RCS temperature > 212°F. Therefore, Mode 2 is typically bypassed for an orderly shutdown.

Assuming one hour is provided to initiate action, this would result in 13 hours as being an appropriate time for reaching Mode 3 in LCO 3.0.3. This change will align the TS LCO requirements with the plant's operational capabilities by allowing more time to accommodate the controlled shutdown as intended and to avoid an unnecessary plant shutdown when the conditions which resulted in an LCO 3.0.3 entry can be understood and corrected in a timely manner. This change is consistent with normal HNP operations to proceed to Mode 3 from Mode 1, bypassing Mode 2, for an orderly shutdown.

Regarding the administrative correction requesting deletion of superseded versions of TS 3.4.10, there is no technical impact since HNP has been adhering to the latest version of TS 3.4.10. In addition, it is noted that for HNP Unit 1, there is no difference, other than page numbering and deletion of a revision bar, from the older version of TS 3.4.10 on TS Page 3.4-25 as issued with Amendment No. 266 to the newer, retained, version of TS 3.4.10 on TS Page 3.4-22 as issued with Amendment No. 277. Likewise, for HNP Unit 2, there is no difference, other than page numbering and deletion of a revision bar, from the older version of TS 3.4.10 on TS Page 3.4-25 as issued with Amendment No. 210 to the newer, retained, version of TS 3.4.10 on TS Page 3.4-22 as issued with Amendment No. 221.

4.0 Regulatory Evaluation

4.1 Applicable Regulatory Requirements / Criteria

The following NRC requirements and guidance documents are applicable to the proposed change.

The regulations of Title 10 of the Code of Federal Regulations (10 CFR) Part 50.36, *Technical specifications*, establish the requirements related to the content of the TS. Section 50.36(c)(2) states:

Limiting conditions for operation. Limiting conditions for operation are the lowest functional capability or performance levels of equipment required for safe operation of the facility. When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specifications until the condition can be met.

The regulatory requirements in 10 CFR 50.36 are not specific regarding the actions to be followed when TS requirements are not met other than a plant shutdown. The proposed change would eliminate the required timeframe for reaching Mode 2 after entering LCO 3.0.3. The requirements of LCO 3.0.3 establish the actions that must be implemented when an LCO is not met and either an associated Required Action and Completion Time is not met and no other Condition applies, or the condition of the unit is not specifically addressed by the associated actions. This specification delineates the time limits for placing the unit in a safe mode or other specified condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its actions. The allowance is reasonable based on plant operating experience and considering the total time to be in Mode 3 of 13 hours, including one hour to initiate action, in LCO 3.0.3 remains unchanged.

4.2 Precedent

The proposed changes are similar to NRC-approved license amendments issued to:

- Duke Energy on January 9, 2019 for Brunswick Units 1 and 2 (NRC Agencywide Documents Access and Management System (ADAMS) Accession No. ML18291B322),
- Tennessee Valley Authority on November 21, 2000 for Browns Ferry Units 1, 2, and 3 (NRC ADAMS Accession No. ML003773700), and
- Exelon Nuclear on May 10, 2006 for Peach Bottom Units 1 and 2 (NRC ADAMS Accession No. ML061070292).

The approved TS changes are similar to the changes proposed in this request. The Brunswick, Browns Ferry, and Peach Bottom units are similar type (i.e., BWR/4) and vintage of reactor design to HNP.

4.3 No Significant Hazards Consideration Determination Analysis

In accordance with 10 CFR 50.90, *Application for amendment of license, construction permit, or early site permit*, Southern Nuclear Operating Company (SNC) requests amendments to renewed facility operating licenses DPR-57 and NPF-5 for Edwin I. Hatch Nuclear Plant (HNP) Units 1 and 2, respectively, to adopt Technical Specifications Task Force (TSTF) Traveler TSTF-208, Revision 0, "Extension of time to reach Mode 2 in LCO 3.0.3." The proposed amendment would eliminate the allowed time to reach Mode 2 in Limiting Condition for Operation (LCO) 3.0.3. In addition, SNC requests an administrative adjustment to delete an older, redundant version of Technical Specification (TS) 3.4.10 in the HNP Unit 1 and Unit 2 TS.

SNC has evaluated whether a significant hazards consideration is involved with the proposed amendment(s) by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

- (1) Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The time frame to take response action in accordance with LCO 3.0.3 is not an initiating condition for any accident previously evaluated. The proposed change does not authorize the addition of any new plant equipment or systems, nor does it alter the assumptions of any accident analyses. The unit would already be preparing for a plant shutdown condition because of the one-hour requirement to initiate shutdown actions. There is no change in the time period to reach Mode 3; thus, the change does not place the plant in any significantly increased probability of an accident occurring. The Mode 3 condition is the point at which the plant reactor core is no longer critical (i.e., Hot Shutdown).

Enclosure 1 to NL-22-0010
Basis for Proposed Change

Therefore, since there is no change to the time period to reach the Hot Shutdown condition, the elimination of the time to reach Mode 2 status does not involve a significant increase in the probability or consequences of an accident previously evaluated.

In addition, administrative deletion of an older, redundant version of TS 3.4.10 does not involve a significant increase in the probability or consequences of an accident previously evaluated because the newer, applicable version of TS 3.4.10 is maintained.

- (2) Does the proposed amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

The proposed change to eliminate the time to reach Mode 2 in LCO 3.0.3 does not require any modification to the plant or change equipment operation. The proposed change will not introduce failure modes that could result in a new accident, and the change does not alter assumptions made in the safety analysis. The proposed change will not alter the design configuration, or method of operation of plant equipment beyond its normal functional capabilities. The proposed change does not create any new credible failure mechanisms, malfunctions, or accident initiators.

SNC also proposes deletion of an older, redundant version of TS 3.4.10 but will maintain the newer, applicable version. This change is administrative in nature.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

- (3) Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed change to eliminate the time to reach Mode 2 in LCO 3.0.3 does not alter or exceed a design basis or safety limit. There is no change being made to safety analysis assumptions or the safety limits that would adversely affect plant safety as a result of the proposed change. Margins of safety are unaffected by the proposed change and the applicable requirements of 10 CFR 50.36(c)(2)(ii) and 10 CFR 50, Appendix A will continue to be met.

SNC also proposes deletion of an older, redundant version of TS 3.4.10 but will maintain the newer, applicable version. This change is administrative in nature.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, SNC concludes that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.4 Conclusion

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 Environmental Considerations

SNC has evaluated the proposed amendment for environmental considerations. The review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR 20. However, the proposed amendment does not involve: (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

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Enclosure 2

HNP Units 1 and 2 Technical Specifications Marked-Up Pages

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

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, and LCO 3.0.8.

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 unit 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 unit, as applicable, in:

~~a. MODE 2 within 7 hours;~~

~~b~~a. MODE 3 within 13 hours; and

~~c~~b. MODE 4 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, and 3.

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,
- 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

(continued)

Delete Page in its entirety.

Reactor Steam Dome Pressure
3.4.10

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.10 Reactor Steam Dome Pressure

LCO 3.4.10 The reactor steam dome pressure shall be ≤ 1058 psig.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Reactor steam dome pressure not within limit.	A.1 Restore reactor steam dome pressure to within limit.	15 minutes
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.4.10.1 Verify reactor steam dome pressure is ≤ 1058 psig.	In accordance with the Surveillance Frequency Control Program

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

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, and LCO 3.0.8.

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 unit 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 unit, as applicable, in:

~~a. MODE 2 within 7 hours;~~

~~b~~a. MODE 3 within 13 hours; and

~~c~~b. MODE 4 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, and 3.

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,
- 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

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Delete Page in its entirety.

Reactor Steam Dome Pressure
3.4.10

3.4 REACTOR COOLANT SYSTEM (RCS)

3.4.10 Reactor Steam Dome Pressure

LCO 3.4.10 The reactor steam dome pressure shall be ≤ 1058 psig.

APPLICABILITY: MODES 1 and 2.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Reactor steam dome pressure not within limit.	A.1 Restore reactor steam dome pressure to within limit.	15 minutes
B. Required Action and associated Completion Time not met.	B.1 Be in MODE 3.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.4.10.1 Verify reactor steam dome pressure is ≤ 1058 psig.	In accordance with the Surveillance Frequency Control Program

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Enclosure 3

HNP Units 1 and 2 Revised Technical Specifications Pages

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

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, and LCO 3.0.8.

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 unit 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 unit, as applicable, in:

- a. MODE 3 within 13 hours; and
- b. MODE 4 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, and 3.

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,
- 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

(continued)

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

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, and LCO 3.0.8.

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 unit 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 unit, as applicable, in:

- a. MODE 3 within 13 hours; and
- b. MODE 4 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, and 3.

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,
- 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

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Enclosure 4

**HNP Units 1 and 2 Technical Specifications Bases Marked-Up Pages
(For Information Only)**

BASES

LCO 3.0.3
(continued)

- c. A Condition exists for which the Required Actions have now been performed.
- d. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time LCO 3.0.3 is exited.

The time limits of Specification 3.0.3 allow 37 hours for the unit to be in MODE 4 when a shutdown is required during MODE 1 operation. If the unit is in a lower MODE of operation when a shutdown is required, the time limit for entering the next lower MODE applies. If a lower MODE is entered in less time than allowed, however, the total allowable time to enter MODE 4, or other applicable MODE, is not reduced. For example, if MODE-2 3 is entered in-2 10 hours, then the time allowed for entering MODE-3 4 is the next-11 27 hours, because the total time for entering MODE-3 4 is not reduced from the allowable limit of-13 37 hours. Therefore, if remedial measures are completed that would permit a return to MODE 1, a penalty is not incurred by having to enter a lower MODE of operation in less than the total time allowed.

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

Exceptions to LCO 3.0.3 are provided in instances where requiring a unit shutdown, in accordance with LCO 3.0.3, would not provide appropriate remedial measures for the associated condition of the unit. An example of this is in LCO 3.7.8, "Spent Fuel Storage Pool Water Level." LCO 3.7.8 has an Applicability of "During movement of irradiated fuel assemblies in the spent fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.8 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.8 of "Suspend movement of irradiated fuel assemblies in the spent fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

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BASES

LCO 3.0.3
(continued)

- c. A Condition exists for which the Required Actions have now been performed.
- d. ACTIONS exist that do not have expired Completion Times. These Completion Times are applicable from the point in time that the Condition is initially entered and not from the time LCO 3.0.3 is exited.

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