

1101 Market Street, Chattanooga, Tennessee 37402

CNL-22-071

July 13, 2022

10 CFR 50.90

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

> Sequoyah Nuclear Plant, Units 1 and 2 Renewed Facility Operating License Nos. DPR-77 and DPR-79 NRC Docket Nos. 50-327 and 50-328

Watts Bar Nuclear Plant, Units 1 and 2 Facility Operating Licenses Nos. NPF-90 and NPF-96 NRC Docket Nos. 50-390 and 50-391

Subject: Supplement to Application to Revise Technical Specifications to Adopt TSTF-577, "Revised Frequencies for Steam Generator Tube Inspections" (SQN-TS-21-03 and WBN-TS-21-08) (EPID L-2022-LLA-0051)

- References: 1. TVA letter to NRC, CNL-22-001, "Application to Revise Technical Specifications to Adopt TSTF-577, 'Revised Frequencies for Steam Generator Tube Inspections' (SQN-TS-21-03 and WBN-TS-21-08)," dated April 4, 2022 (ML22095A023)
 - 2. NRC electronic mail to TVA, "LAR to Adopt TSTF-577 (EPID L-2022-LLA-0051)," dated June 6, 2022 (ML22166A429)

In Reference 1, Tennessee Valley Authority (TVA) submitted a request for an amendment to Renewed Facility Operating License Nos. DPR-77 and DPR-79 for the Sequoyah Nuclear Plant (SQN), Units 1 and 2 and Facility Operating License Nos. NPF-90 and NPF-96 for the Watts Bar Nuclear Plant (WBN), Units 1 and 2, respectively. TVA requested adoption of Technical Specifications Task Force (TSTF)-577, "Revised Frequencies for Steam Generator Tube Inspections," which is an approved change to the Standard Technical Specifications (STS), into the SQN Units 1 and 2 and WBN Units 1 and 2 Technical Specifications (TS).

TVA is supplementing Reference 1 to make the following editorial changes to the SQN and WBN TS provided in Reference 1 that were identified by the Nuclear Regulatory Commission in Reference 2.

- SQN Unit 1 and Unit 2 TS 5.6.6 and WBN Unit 1 and Unit 2 TS 5.9.9 items "c.3" and "e" are revised to add an "and" after the semicolon.
- WBN Unit 2 TS 5.9.9 item f is revised to add a period versus a comma at the end of this TS.

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- WBN Unit 1 and Unit 2 TS 5.9.9 is revised to add quotation marks for the title of WBN Unit 1 and Unit 2 TS 5.7.2.12.
- WBN Unit 2 TS 5.7.2.12 paragraph b.1 is revised to add a comma after "design specification" to be consistent with the STS and the WBN Unit 1 TS.

Enclosure 1 provides the revised SQN Units 1 and 2 TS pages marked to show the proposed changes. Enclosure 2 provides the revised WBN Units 1 and 2 TS pages marked to show the proposed changes. Enclosure 3 provides the revised (final typed) SQN Units 1 and 2 TS pages. Enclosure 4 provides the revised (final typed) WBN Units 1 and 2 TS pages. The TS Bases are not affected by the proposed changes. The proposed TS changes provided in Enclosures 1 through 4 supersede the corresponding TS changes in Reference 1.

This letter does not change the no significant hazard considerations or the environmental considerations contained in Reference 1. In accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and enclosure to the Tennessee State Department of Environment and Conservation.

There are no new regulatory commitments associated with this submittal. Please address any questions regarding this request to Stuart L. Rymer, Senior Manager, Fleet Licensing, at <u>slrymer@tva.gov</u>.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 13th day of July 2022.

Respectfully,

James Garts

Digitally signed by Rearden, Pamela S Date: 2022.07.13 15:44:39 -04'00'

James Barstow Vice President, Nuclear Regulatory Affairs & Support Services

Enclosures:

- 1. Revised TS Changes (Markups) for SQN Units 1 and 2
- 2. Revised TS Changes (Markups) for WBN Units 1 and 2
- 3. Revised TS Changes (Final Typed) for SQN Units 1 and 2
- 4. Revised TS Changes (Final Typed) for WBN Units 1 and 2

cc (Enclosures):

NRC Regional Administrator – Region II NRC Senior Resident Inspector – Sequoyah Nuclear Plant NRC Project Manager – Sequoyah Nuclear Plant NRC Senior Resident Inspector – Watts Bar Nuclear Plant NRC Project Manager – Watts Bar Nuclear Plant Director, Division of Radiological Health – Tennessee State Department of Environment and Conservation

Enclosure 1

Revised TS Changes (Markups) for SQN Units 1 and 2

5.5.6 <u>Inservice Testing Program</u> (continued)

d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

5.5.7 <u>Steam Generator (SG) Program</u>

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

- a. Provisions 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.
 - 1. Structural integrity performance criterion: All in-service steam generatorSG tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cool down), 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 loading 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.

5.5.7 <u>Steam Generator (SG) Program</u> (continued)

- 2. 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 1 gpm per SG.
- 3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."
- c. Provisions for SG tube plugging 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.
- 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 the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube plugging criteria. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 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. A degradation assessment 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.
 - 1. Inspect 100% of the tubes in each SG during the first refueling outage following SG installation.
 - 2. After the first refueling outage following SG installation, inspect 100% 2. of the tubes in each SG at least every 96 effective full power months, which defines the inspection period. Tube inspections shall be performed using equivalent to or better than array probe technology. For regions where a tube inspection with array probe technology is not possible (such as due to dimensional constraints or tube specific conditions), the tube inspection techniques applied shall be capable of detecting all forms of existing and potential degradation in that region. In addition, the minimum number of tubes inspected at each scheduled inspection shall be the number of tubes in all SGs divided by the number of SG inspection outages scheduled in each inspection period as defined in a and b below. If a degradation assessment indicates the potential for a type of degradation to occur at

a location not previously inspected with a technique capable of detecting this type of degradation at this location and that may satisfy

5.5.7 <u>Steam Generator (SG) Program</u> (continued)

the applicable tube plugging criteria, the minimum number of locations inspected with such a capable inspection technique during the remainder of the inspection period may be prorated. The fraction of locations to be inspected for this potential type of degradation at this location at the end of the inspection period shall be no less than the ratio of the number of times the SG is scheduled to be inspected in the inspection period after the determination that a new form of degradation could potentially be occurring at this location divided by the total number of times the SG is scheduled to be inspected in the inspection period. Each inspection period defined below may be extended up to 3 effective full power months to include a SG inspection outage in an inspection period and the subsequent inspection period begins at the conclusion of the included SG inspection outage.

- After the first refueling outage following SG installation, inspect 100% of the tubes during the next 144 effective full power months. This constitutes the first inspection period;
- b) During the next 96 effective full power months, inspect 100% of the tubes. This constitutes the second and subsequent inspection periods.
- 3. If crack indications are found in any SG tube, then the next inspection for each affected and potentially affected SG for the degradation mechanism that caused the crack indication shall be at the nextnot exceed 24 effective full power months or one refueling outage (whichever results in more frequent inspections). 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.
- e. Provisions for monitoring operational primary to secondary LEAKAGE.

5.6 Reporting Requirements

5.6.6 Steam Generator Tube Inspection Report

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 5.5.7, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG;
- b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibilityActive degradation mechanisms found;
- c. For each degradation mechanism found:
 - 1. The nondestructive examination techniques utilized;
 - 2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;
 - 3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and
 - The number of tubes plugged during the inspection outage.Nondestructive examination techniques utilized for each degradation mechanism;
- d. An analysis summary of the tube integrity conditions predicted to exist at the next scheduled inspection (the forward-looking tube integrity assessment) relative to the applicable performance criteria, including the analysis methodology, inputs, and results; Location, orientation (if linear), and measured sizes (if available) of service induced indications;
- e. Number of tubes plugged during the inspection outage for each active degradation mechanism;
- -f. The number and percentage of tubes plugged to date, and the effective plugging percentage in each SGTotal number and percentage of tubes plugged to date; and
- gf. The results of any SG secondary side inspections.

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. Discuss trending of tube degradation over the inspection interval and provide comparison of the prior operational assessment degradation projections to the as-found condition.

5.5.6 <u>Inservice Testing Program</u> (continued)

d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

5.5.7 <u>Steam Generator (SG) Program</u>

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

- a. Provisions 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.
 - 1. Structural integrity performance criterion: All in-service steam generatorSG tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cool down), 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 loading 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.

5.5.7 <u>Steam Generator (SG) Program</u> (continued)

- 2. 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 1 gpm per SG.
- 3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."
- c. Provisions for SG tube plugging 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.
- 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 the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube plugging criteria. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 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. A degradation assessment 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.
 - 1. Inspect 100% of the tubes in each SG during the first refueling outage following SG installation.
 - 2. After the first refueling outage following SG installation, inspect 100% of the tubes in each SG at least every 9672 effective full power months, which defines the inspection period.-or at least every third refueling outage (whichever results in more frequent inspections). In addition, the minimum number of tubes inspected at each scheduled inspection shall be the number of tubes in all SGs divided by the number of SG inspection outages scheduled in each inspection period as defined in a, b, c, and d below. If a degradation assessment indicates the potential for a type of degradation to occur at a location not previously inspected with a technique capable of detecting this type of degradation at this location and that may satisfy the applicable tube plugging criteria, the minimum number of locations inspected with such a capable inspection technique during the remainder of the inspection

5.5.7 <u>Steam Generator (SG) Program</u> (continued)

period may be prorated. The fraction of locations to be inspected for this potential type of degradation at this location at the end of the inspection period shall be no less than the ratio of the number of times the SG is scheduled to be inspected in the inspection period after the determination that a new form of degradation could potentially be occurring at this location divided by the total number of times the SG is scheduled to be inspected in the inspection period. Each inspection period defined below may be extended up to 3 effective full power months to include a SG inspection outage in an inspection period and the subsequent inspection period begins at the conclusion of the included SG inspection outage.

- a) After the first refueling outage following SG installation, inspect 100% of the tubes during the next 144 effective full power months. This constitutes the first inspection period;
- b) During the next 120 effective full power months, inspect 100% of the tubes. This constitutes the second inspection period;
- c) During the next 96 effective full power months, inspect 100% of the tubes. This constitutes the third inspection period; and
- d) During the remaining life of the SGs, inspect 100% of the tubes every 72 effective full power months. This constitutes the fourth and subsequent inspection periods.
- 3. If crack indications are found in any SG tube, then the next inspection for each affected and potentially affected SG for the degradation mechanism that caused the crack indication shall be at the next not exceed 24 effective full power months or one refueling outage (whichever results in more frequent inspections). 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.
- e. Provisions for monitoring operational primary to secondary LEAKAGE.

5.6 Reporting Requirements

5.6.6 Steam Generator Tube Inspection Report

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 5.5.7, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG;
- b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibilityActive degradation mechanisms found;
- c. For each degradation mechanism found:
 - 1. The nondestructive examination techniques utilized;
 - 2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;
 - 3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and

4. The number of tubes plugged during the inspection outage. Nondestructive examination techniques utilized for each degradation mechanism;

- d. An analysis summary of the tube integrity conditions predicted to exist at the next scheduled inspection (the forward-looking tube integrity assessment) relative to the applicable performance criteria, including the analysis methodology, inputs, and results; Location, orientation (if linear), and measured sizes (if available) of service induced indications;
- e. The number and percentage of tubes plugged to date, and the effective plugging percentage in each SGNumber of tubes plugged during the inspection outage for each active degradation mechanism; and
- f. Total number and percentage of tubes plugged to date;
- g. The results of condition monitoring, including the results of tube pulls and insitu testing; and

h. The results of any SG secondary side inspections The effective plugging percentage for all plugging in each SG.

Enclosure 2

Revised TS Changes (Markups) for WBN Units 1 and 2

5.7 Procedures, Programs, and Manuals (continued)

5.7.2.12 Steam Generator (SG) Program

An -SGSteam Generator Program shall be established and implemented to ensure that SG tube integrity is maintained. In addition, the SGSteam Generator Program shall include the following:

- a. Provisions 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.
 - 1. Structural integrity performance criterion: All in-service steamgeneratorSG tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, cooldown), 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-tosecondary pressure differentials. Apart from the above requirements, additional loading 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.
 - 2. Accident induced leakage performance criterion: The primary-tosecondary 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 for all degradation mechanisms is not to exceed 150 gpd for each unfaulted SG. Leakage for all degradation mechanisms is not to exceed 1 gpm in the faulted SG.

5.7 Procedures, Programs, and Manuals

- 5.7.2.12 Steam Generator (SG) Program (continued)
 - 3. The operational leakage performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."
 - c. Provisions for SG tube plugging 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.
 - 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 the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube plugging criteria. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 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. A degradation assessment 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.
 - 1. Inspect 100% of the tubes in each SG during the first refueling outage following SG installation.
 - 2. After the first refueling outage following SG installation, inspect 100% of the tubes in each SG at least every 96 effective full power months, which defines the inspection period. Tube inspections shall be performed using equivalent to or better than array probe technology. For regions where a tube inspection with array probe technology is not possible (such as dueto dimensional constraints or tube specific conditions), the tube inspectiontechniques applied shall be capable of detecting all forms of existing and potential degradation in that region. In addition, the minimum number of tubes inspected at each scheduled inspection shall be the number of tubes in all SGs divided by the number of SG inspection outages scheduled in each inspection period as defined in a and b below. If a degradation assessment indicates the potential for a type of degradationto occur at a location not previously inspected with a technique capable of detecting this type of degradation at this location and that may satisfy the applicable tube plugging criteria, the minimum number of locationsinspected with such a capable inspection technique during the remainder of the inspection period may be prorated. The fraction of locations to beinspected for this potential type of degradation at this location at the endof the inspection period shall be no less than the ratio of the number of times the SG is scheduled to be inspected in the inspection period afterthe determination that a new form of degradation could potentially beoccurring at this location divided by the

- 3. If crack indications are found in any SG tube, then the next inspection for each affected and potentially affected SG for the degradation mechanism that caused the crack indication shall be at the next not exceed 24effective full power months or one refueling outage (whichever results in more frequent inspections). 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.
- e. Provisions for monitoring operational primary-to-secondary LEAKAGE.

5.7 Procedures, Programs, and Manuals

5.7.2.12 Steam Generator (SG) Program (continued)

- total number of times the SG is scheduled to be inspected in the inspection period. Each inspection period defined below may be extended up to 3 effective full power months to include a SG inspection outage in an inspection period and the subsequent inspection period-begins at the conclusion of the included SG inspection outage.
- a) After the first refueling outage following SG installation, inspect 100%of the tubes during the next 144 effective full power months. This constitutes the first inspection period.

b) During the next 96 effective pull power months, inspect 100% of the tubes. This constitutes the second and subsequent inspection periods.

5.9 Reporting Requirements (continued)

5.9.7 EDG Failures Report

If an individual emergency diesel generator (EDG) experiences four or more valid failures in the last 25 demands, these failures and any nonvalid failures experienced by that EDG in that time period shall be reported within 30 days. Reports on EDG failures shall include the information recommended in Regulatory Guide 1.9, Revision 3, Regulatory Position C.4, or existing Regulatory Guide 1.108 reporting requirement.

5.9.8 PAMS Report

When a Report is required by Condition B or F of LCO 3.3.3, "Post Accident Monitoring (PAM) 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 of the Function to OPERABLE status.

5.9.9 Steam Generator Tube Inspection Report

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 5.7.2.12, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG;;
- b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibility; Degradation mechanisms found,
- c. Nondestructive examination techniques utilized for each degradation mechanism,For each degradation mechanism found:
 - 1. The nondestructive examination techniques utilized;
 - 2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;
 - 3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and

c.4. The number of tubes plugged during the inspection outage.

d. <u>Location, orientation (if linear), and measured sizes (if available) of service inducedindications</u>,An analysis summary of the tube integrity conditions predicted to exist at the next scheduled inspection (the forward-looking tube integrity assessment) relative to the applicable performance criteria, including the analysis methodology, inputs, and results;

e. Number of tubes plugged during the inspection outage for each degradation mechanism,

- f.e. The number and percentage of tubes plugged to date, and the effective plugging percentage in each steam generatorSG₇; and
- g. The results of any SG secondary side inspections.condition monitoring, including the results of tube pulls and in-situ testing, and
- f. h. Discuss trending of tube degradation over the inspection interval and providecomparison of the prior operational assessment degradation projections to the as-foundcondition.

5.7.2.12 Steam Generator (SG) Program

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

- a. Provisions 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 a 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.
 - 1. Structural integrity performance criterion: All in-service steam generatorSG tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cooldown), 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 loading 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.

- 5.7.2.12 Steam Generator (SG) Program (continued)
 - 2. Accident induced leakage performance criterion: The primary-to-secondary accident induced leakage rate for any design basis accident, other than an 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 for all degradation mechanisms is not to exceed 150 gpd for each unfaulted SG. Leakage for all degradation mechanisms is not to exceed 1 gpm in the faulted SG.
 - 3. The operational leakage performance criterion is specified in LCO 3.4.13, ""RCS Operational LEAKAGE.""
 - c. Provisions for SG tube plugging 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.

- 5.7.2.12 Steam Generator (SG) Program (continued)
 - Provisions for SG tube inspections. Periodic SG tube inspections d. 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 the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube plugging criteria. The tube-totubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 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. A degradation assessment 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.
 - 1. Inspect 100% of the tubes in each SG during the first refueling outage following SG installation.
 - 2. After the first refueling outage following SG installation, inspect 100% of the tubes in each SG at least every 9672 effective full power months, which defines the inspection period.or at least every third refueling outage-(whichever results in more frequent inspections). In addition, the minimum number of tubes inspected at each scheduled inspection shall be the number of tubes in all SGs divided by the number of SG inspection outages scheduled in each inspection period as defined in a, b, c and d below. If a degradation assessment indicates the potential for a type of degradation to occur at a location not previously inspected with a technique capable of detecting this type of degradation at this location and that may satisfy the applicable tube plugging criteria, the minimum number of locations inspected with such a capable inspection technique during the remainder of the inspection period may be prorated. The fraction of locations to be inspected for this potential type of degradation at this location at the end of the inspectionperiod shall be no less than the ratio of the number of timesthe SG is scheduled to be inspected in the inspection periodafter the determination that a new form of degradation couldpotentially be occurring at this location divided by the total number of times the SG is scheduled to be inspected in the

inspection period. Each inspection period defined below may be extended up to 3 effective full power months to include a SG inspection outage in an inspection period and the subsequent inspection period begins at the conclusion a) of the included SG inspection outage.After the firstrefueling outage following SG installation, inspect 100% ofthe tubes during the next 144 effective full power months. This constitutes the first inspection period;

 b) During the next 120 effective full power months, inspect 100%of the tubes. This constitutes the second inspection period;
c) During the next 96 effective full power months, inspect 100%of the tubes. This constitutes the third inspection period; and During the remaining life of the SGs, inspect 100% of the tubes every-72 effective full power months. This constitutes the fourth andsubsequent inspection periods.

- 3. If crack indications are found in any SG tube, then the next inspection for each affected and potentially affected SG for the degradation mechanism that caused the crack indication shall be at the next not exceed 24 effective full power months or one-refueling outage (whichever results in more frequent inspections). 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.
- e. Provisions for monitoring operational primary-to-secondary LEAKAGE.

5.9 Reporting Requirements (continued)

5.9.7 DG Failures Report

If an individual diesel generator (DG) experiences four or more valid failures in the last 25 demands, these failures and any nonvalid failures experienced by that DG in that time period shall be reported within 30 days. Reports on DG failures shall include the information recommended in Regulatory Guide 1.9, Revision 3, Regulatory Position C.4, or existing Regulatory Guide 1.108 reporting requirement.

5.9.8 PAMS Report

When a Report is required by Condition B or F of LCO 3.3.3, "Post Accident Monitoring (PAM) 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 of the Function to OPERABLE status.

5.9.9 Steam Generator Tube Inspection Report

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 5.7.2.12, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG;,
- b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibility; Degradation mechanisms found,
- c. For each degradation mechanism found:
 - 1. The nondestructive examination techniques utilized;
 - 2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;
 - 3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and
 - c.4. The number of tubes plugged during the inspection outage. Nondestructive examination techniques utilized for each-degradation mechanism,
- d. An analysis summary of the tube integrity conditions predicted to exist at the next scheduled inspection (the forward-looking tube integrity assessment) relative to the applicable performance criteria, including the analysis

methodology, inputs, and results;Location, orientation (if linear), and measured sizes (if available) of service induced indications,

5.9 Reporting Requirements (continued)

5.9.9 Steam Generator Tube Inspection Report (continued)

- e. The number and percentage of tubes plugged to date, and the effective plugging percentage in each SGNumber of tubes plugged during the inspection outage for each degradation mechanism; and
- f. The results of any SG secondary side inspectionsnumber and percentage of tubes plugged to date, and effective plugging percentage in each SG,.

g. The results of condition monitoring, including the results of tube pulls and in-situ testing.

5.10 Record Retention

(removed from Technical Specifications)

Enclosure 3

Revised TS Changes (Final Typed) for SQN Units 1 and 2

5.5.6 <u>Inservice Testing Program</u> (continued)

d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

5.5.7 <u>Steam Generator (SG) Program</u>

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

- a. Provisions 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.
 - 1. Structural integrity performance criterion: All in-service SG tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cool down), 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 loading 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.

5.5.7 <u>Steam Generator (SG) Program</u> (continued)

- 2. 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 1 gpm per SG.
- 3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."
- c. Provisions for SG tube plugging 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.
- 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 the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube plugging criteria. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 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. A degradation assessment 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.
 - 1. Inspect 100% of the tubes in each SG during the first refueling outage following SG installation.
 - 2. After the first refueling outage following SG installation, inspect 100% of the tubes in each SG at least every 96 effective full power months, which defines the inspection period.

5.5.7 <u>Steam Generator (SG) Program</u> (continued)

- 3. If crack indications are found in any SG tube, then the next inspection for each affected and potentially affected SG for the degradation mechanism that caused the crack indication shall be at the next refueling outage. 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.
- e. Provisions for monitoring operational primary to secondary LEAKAGE.

5.6 Reporting Requirements

5.6.6 Steam Generator Tube Inspection Report

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 5.5.7, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG;
- b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibility;
- c. For each degradation mechanism found:
 - 1. The nondestructive examination techniques utilized;
 - 2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;
 - 3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and
 - 4. The number of tubes plugged during the inspection outage.
- d. An analysis summary of the tube integrity conditions predicted to exist at the next scheduled inspection (the forward-looking tube integrity assessment) relative to the applicable performance criteria, including the analysis methodology, inputs, and results;
- e. The number and percentage of tubes plugged to date, and the effective plugging percentage in each SG; and
- f. The results of any SG secondary side inspections.

5.5.6 <u>Inservice Testing Program</u> (continued)

d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.

5.5.7 <u>Steam Generator (SG) Program</u>

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

- a. Provisions 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.
 - 1. Structural integrity performance criterion: All in-service SG tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cool down), 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 loading 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.

5.5.7 <u>Steam Generator (SG) Program</u> (continued)

- 2. 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 1 gpm per SG.
- 3. The operational LEAKAGE performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."
- c. Provisions for SG tube plugging 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.
- 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 the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube plugging criteria. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 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. A degradation assessment 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.
 - 1. Inspect 100% of the tubes in each SG during the first refueling outage following SG installation.
 - 2. After the first refueling outage following SG installation, inspect 100% of the tubes in each SG at least every 96 effective full power months, which defines the inspection period.

5.5.7 <u>Steam Generator (SG) Program</u> (continued)

- 3. If crack indications are found in any SG tube, then the next inspection for each affected and potentially affected SG for the degradation mechanism that caused the crack indication shall be at the next refueling outage. 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.
- e. Provisions for monitoring operational primary to secondary LEAKAGE.

5.6 Reporting Requirements

5.6.6 Steam Generator Tube Inspection Report

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 5.5.7, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG;
- b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibility;
- c. For each degradation mechanism found:
 - 1. The nondestructive examination techniques utilized;
 - 2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;
 - 3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and
 - 4. The number of tubes plugged during the inspection outage.
- d. An analysis summary of the tube integrity conditions predicted to exist at the next scheduled inspection (the forward-looking tube integrity assessment) relative to the applicable performance criteria, including the analysis methodology, inputs, and results;
- e. The number and percentage of tubes plugged to date, and the effective plugging percentage in each SG; and
- f. The results of any SG secondary side inspections.

Enclosure 4

Revised TS Changes (Final Typed) for WBN Units 1 and 2

5.7 Procedures, Programs, and Manuals (continued)

5.7.2.12 Steam Generator (SG) Program

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

- a. Provisions 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.
 - 1. Structural integrity performance criterion: All in-service SG tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, cooldown), 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-tosecondary 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 loading 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.
 - 2. Accident induced leakage performance criterion: The primary-tosecondary 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 for all degradation mechanisms is not to exceed 150 gpd for each unfaulted SG. Leakage for all degradation mechanisms is not to exceed 1 gpm in the faulted SG.

5.7 Procedures, Programs, and Manuals

- 5.7.2.12 Steam Generator (SG) Program (continued)
 - 3. The operational leakage performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."
 - c. Provisions for SG tube plugging 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.
 - 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 the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube plugging criteria. The tube-to-tubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 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. A degradation assessment 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.
 - 1. Inspect 100% of the tubes in each SG during the first refueling outage following SG installation.
 - 2. After the first refueling outage following SG installation, inspect 100% of the tubes in each SG at least every 96 effective full power months, which defines the inspection period.
 - 3. If crack indications are found in any SG tube, then the next inspection for each affected and potentially affected SG for the degradation mechanism that caused the crack indication shall be at the next refueling outage. 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.
 - e. Provisions for monitoring operational primary-to-secondary LEAKAGE.

5.9 Reporting Requirements (continued)

5.9.7 EDG Failures Report

If an individual emergency diesel generator (EDG) experiences four or more valid failures in the last 25 demands, these failures and any nonvalid failures experienced by that EDG in that time period shall be reported within 30 days. Reports on EDG failures shall include the information recommended in Regulatory Guide 1.9, Revision 3, Regulatory Position C.4, or existing Regulatory Guide 1.108 reporting requirement.

5.9.8 An SG Program shall be established and implemented to ensure that SG tube PAMS Report is maintained. In addition, the SG Program shall include the following provisions: When a Report is required by Condition B or F of LCO 3.3.3, "Post Accident Monitoring (PAM) 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 of the Function to OPERABLE status.

5.9.9 Steam Generator Tube Inspection Report

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 5.7.2.12, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG;
- b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibility;
- c. For each degradation mechanism found:
 - 1. The nondestructive examination techniques utilized;
 - 2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;
 - 3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and
 - 4. The number of tubes plugged during the inspection outage.
- d. An analysis summary of the tube integrity conditions predicted to exist at the next scheduled inspection (the forward-looking tube integrity assessment) relative to the applicable performance criteria, including the analysis methodology, inputs, and results;
- e. The number and percentage of tubes plugged to date, and the effective plugging percentage in each SG; and
- f. The results of any SG secondary side inspections.

5.7.2.12 Steam Generator (SG) Program

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

- a. Provisions 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 a 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.
 - 1. Structural integrity performance criterion: All in-service SG tubes shall retain structural integrity over the full range of normal operating conditions (including startup, operation in the power range, hot standby, and cooldown), 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 loading 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.

- 5.7.2.12 Steam Generator (SG) Program (continued)
 - 2. Accident induced leakage performance criterion: The primary-to-secondary accident induced leakage rate for any design basis accident, other than an 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 for all degradation mechanisms is not to exceed 150 gpd for each unfaulted SG. Leakage for all degradation mechanisms is not to exceed 1 gpm in the faulted SG.
 - 3. The operational leakage performance criterion is specified in LCO 3.4.13, "RCS Operational LEAKAGE."
 - c. Provisions for SG tube plugging 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.

- 5.7.2.12 Steam Generator (SG) Program (continued)
 - Provisions for SG tube inspections. Periodic SG tube inspections d. 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 the tube-to-tubesheet weld at the tube inlet to the tube-to-tubesheet weld at the tube outlet, and that may satisfy the applicable tube plugging criteria. The tube-totubesheet weld is not part of the tube. In addition to meeting the requirements of d.1, d.2, and d.3 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. A degradation assessment 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.
 - 1. Inspect 100% of the tubes in each SG during the first refueling outage following SG installation.
 - After the first refueling outage following SG installation, inspect 100% of the tubes in each SG at least every 96 effective full power months, which defines the inspection period.
 - 3. If crack indications are found in any SG tube, then the next inspection for each affected and potentially affected SG for the degradation mechanism that caused the crack indication shall be at the next refueling outage. 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.
 - e. Provisions for monitoring operational primary-to-secondary LEAKAGE.

5.9 Reporting Requirements (continued)

5.9.7 DG Failures Report

If an individual diesel generator (DG) experiences four or more valid failures in the last 25 demands, these failures and any nonvalid failures experienced by that DG in that time period shall be reported within 30 days. Reports on DG failures shall include the information recommended in Regulatory Guide 1.9, Revision 3, Regulatory Position C.4, or existing Regulatory Guide 1.108 reporting requirement.

5.9.8 PAMS Report

When a Report is required by Condition B or F of LCO 3.3.3, "Post Accident Monitoring (PAM) 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 of the Function to OPERABLE status.

5.9.9 Steam Generator Tube Inspection Report

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 5.7.2.12, "Steam Generator (SG) Program." The report shall include:

- a. The scope of inspections performed on each SG;
- b. The nondestructive examination techniques utilized for tubes with increased degradation susceptibility;
- c. For each degradation mechanism found:
 - 1. The nondestructive examination techniques utilized;
 - 2. The location, orientation (if linear), measured size (if available), and voltage response for each indication. For tube wear at support structures less than 20 percent through-wall, only the total number of indications needs to be reported;
 - 3. A description of the condition monitoring assessment and results, including the margin to the tube integrity performance criteria and comparison with the margin predicted to exist at the inspection by the previous forward-looking tube integrity assessment; and
 - 4. The number of tubes plugged during the inspection outage.
- d. An analysis summary of the tube integrity conditions predicted to exist at the next scheduled inspection (the forward-looking tube integrity assessment) relative to the applicable performance criteria, including the analysis methodology, inputs, and results;

5.9 Reporting Requirements (continued)

5.9.9 Steam Generator Tube Inspection Report (continued)

- e. The number and percentage of tubes plugged to date, and the effective plugging percentage in each SG; and
- f. The results of any SG secondary side inspections.

5.10 Record Retention

(removed from Technical Specifications)