

JAFP-24-0036

July 29, 2024

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

James A. FitzPatrick Nuclear Power Plant
Renewed Facility Operating License No. DPR-59
NRC Docket No. 50-333

Subject: Supplement to License Amendment Request to Update the Technical Specification Bases to Change the Fuel Handling Accident Analysis

- References:
1. Letter from D. Gudger (Constellation Energy Generation, LLC) to U.S. Nuclear Regulatory Commission, "License Amendment Request to Update the Technical Specification Bases to Change the Fuel Handling Accident Analysis," JAFP-23-0040, dated August 3, 2023 (Accession Number ML23215A012)
 2. Letter from D. Gudger (Constellation Energy Generation, LLC) to U.S. Nuclear Regulatory Commission, "Supplemental Information for License Amendment Request to Update the Technical Specification Bases to Change the Fuel Handling Accident Analysis," JAFP-23-0048, dated August 31, 2023 (Accession Number ML23243A946)
 3. Letter from D. Gudger (Constellation Energy Generation, LLC) to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information for License Amendment Request to Update the Technical Specification Bases to Change the Fuel Handling Accident Analysis," JAFP-24-0009, dated February 28, 2024 (Accession Number ML24059A130)
 4. Letter from D. Gudger (Constellation Energy Generation, LLC) to U.S. Nuclear Regulatory Commission, "Response to Request for Additional Information for License Amendment Request to Update the Technical Specification Bases to Change the Fuel Handling Accident Analysis," JAFP-24-0014, dated March 25, 2024 (Accession Number ML24085A234)

By letter dated August 3, 2023, Constellation Energy Generation, LLC (CEG) requested a change to the James A. FitzPatrick Technical Specifications (TS) Bases in accordance with the provisions of Title 10 of the Code of Federal Regulations with the provisions of 10 CFR 50.90. The proposed amendment changes to the Technical Specification (TS) Bases to change the Fuel Handling Accident Analysis (FHA) due to new Refuel Bridge Mast NF400 to NF500 and definition for Recently Irradiated Fuel Assemblies at James A. FitzPatrick Nuclear Power Plant (JAF). The impact of the proposed amendment would increase the consequences of the FHA analysis as well as reduce future refueling outage burden.

Through email conversations with J. Kim, NRC Project Manager and CEG, between July 22, 2024, and July 26, 2024, the NRC identified and communicated a concern regarding changes to the term "Recently Irradiated Fuel Assemblies" in the referenced License Amendment Request.

The NRC Office of General Counsel (OGC) concern is that the term "Recently Irradiated Fuel Assemblies" is consistently used throughout the TS but is not defined in the TS. The value of 96 hours is stated in all applicable TS bases. The term "recently" was added to the TS and TS Bases from a 2002 TS amendment (ML022350228). With that amendment, the value of "96 hours" was only added to the TS bases. That amendment established 96 hours for all TSs as the time period beyond which fuel is no longer considered "recently irradiated."

References 1 thru 4 established different values for when fuel would be considered "recently irradiated" however the changes were only documented in the TS Bases which raised a concern that the different TSs would use the same term, "recently irradiated" but the applicable time, per the TS Bases, would be different.

In response to NRC OGCs concern on "Recently Irradiated Fuel Assemblies", CEG is supplementing Reference 1 to revise the applicable TSs to be consistent with the changes made to the associated TS bases. The specific changes are provided in Attachment 1 to this supplement.

JAF is entering a Refueling Outage on September 5, 2024, and is scheduled to commence moving fuel on September 7, 2024. Approval of this request is necessary to support fuel moves during this outage. Accordingly, CEG is requesting the proposed change be reviewed under exigent circumstances in accordance with 10 CFR 50.91(a)(6), and requests that the NRC expedite the review of the requested change to support approval by September 5, 2024.

This amendment request contains no new regulatory commitments.

The proposed changes have been reviewed by the JAF Plant Operations Review Committee in accordance with the requirements of the Constellation Quality Assurance Program.

In accordance with 10 CFR 50.91, "Notice for public comment; State consultation," paragraph (b), CEG is transmitting a copy of this application and its attachments to the designated State Officials.

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Should you have any questions concerning this supplement, please contact Dave Gudger
David.Gudger@constellation.com.

Approval of the supplement requested by September 5, 2024.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 29th
day of July 2024.

Respectfully,

David T. Gudger

David T. Gudger
Senior Manager - Licensing & Regulatory Affairs
Constellation Energy Generation, LLC

Attachments:

1. Proposed Technical Specification Changes (Mark-up Pages)
2. Proposed Technical Specification Changes (Clean Pages)

cc:	USNRC Region I, Regional Administrator	w/attachment
	USNRC Senior Resident Inspector, JAF	w/attachment
	USNRC Project Manager, JAF	w/attachment
	A. L. Peterson, NYSERDA	w/attachment

ATTACHMENT 1

License Amendment Request

James A. FitzPatrick Nuclear Power Plant

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PROPOSED TECHNICAL SPECIFICATION CHANGES (MARK-UP PAGES)

Facility Operating License (FOL) Page

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TS Pages

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- (3) Constellation Energy Generation, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use, at any time, any byproduct, source, and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
 - (4) Constellation Energy Generation, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use, at any time, any byproduct, source, and special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration; or associated with radioactive apparatus, components or tools.
 - (5) Constellation Energy Generation, LLC, pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- (1) Maximum Power Level
Constellation Energy Generation, LLC is authorized to operate the facility at steady state reactor core power levels not in excess of 2536 megawatts (thermal).
 - (2) Technical Specifications
The Technical Specifications contained in Appendix A, as revised through Amendment No. 355 , are hereby incorporated in the renewed operating license. The licensee shall operate the facility in accordance with the Technical Specifications.

Secondary Containment Isolation Instrumentation
3.3.6.2

Table 3.3.6.2-1 (page 1 of 1)
Secondary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Reactor Vessel Water Level - Low (Level 3)	1, 2, 3	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.5 SR 3.3.6.2.6	≥ 177 inches
2. Drywell Pressure - High	1, 2, 3	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.5 SR 3.3.6.2.6	≤ 2.7 psig
3. Reactor Building Exhaust Radiation - High	1, 2, 3, (a)	1	SR 3.3.6.2.1 SR 3.3.6.2.3 SR 3.3.6.2.6	≤ 24,800 cpm
4. Refueling Floor Exhaust Radiation - High	1, 2, 3, (a)	1	SR 3.3.6.2.1 SR 3.3.6.2.3 SR 3.3.6.2.6	≤ 24,800 cpm

(a) During movement of recently irradiated fuel assemblies in secondary containment. "Recently irradiated" is defined for Technical Specification 3.3.6.2 as fuel assemblies which have occupied part of a critical reactor core within the previous 24 hours.

3.3 INSTRUMENTATION

3.3.7.1 Control Room Emergency Ventilation Air Supply (CREVAS) System Instrumentation

LCO 3.3.7.1 The Control Room Air Inlet Radiation – High channel shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3,
During movement of recently irradiated fuel assemblies in the secondary containment.

-----NOTE-----
 “Recently irradiated” is defined for Technical Specification 3.3.7.1 as fuel assemblies which have occupied part of a critical reactor core within the previous 104 hours.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Channel inoperable.	A.1 Place the CREVAS System in the isolate mode of operation.	1 hour
	<u>OR</u>	
	A.2 Declare both CREVAS subsystems inoperable.	1 hour

3.6 CONTAINMENT SYSTEMS

3.6.4.1 Secondary Containment

LCO 3.6.4.1 The secondary containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
During movement of recently irradiated fuel assemblies in
the secondary containment.

-----NOTE-----
"Recently irradiated" is defined for Technical Specification 3.6.4.1 as
fuel assemblies which have occupied part of a critical reactor core
within the previous 24 hours.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Secondary containment inoperable in MODE 1, 2, or 3.	A.1 Restore secondary containment to OPERABLE status.	4 hours*
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3.	12 hours
	<u>AND</u> B.2 Be in MODE 4.	36 hours
C. Secondary containment inoperable during movement of recently irradiated fuel assemblies in the secondary containment.	C.1 -----NOTE----- LCO 3.0.3 is not applicable. ----- Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately

* The Completion Time is extended to 30 hours, in support of the "A" RHR pump repairs, contingent on implementation of Compensatory Actions stated in Section 3.4 of letter JAFP-21-0053, dated June 14, 2021, as a one-time only change ending upon restoration of the "A" RHR pump to OPERABLE, or on July 11, 2021 at 20:00 hours. Multiple entries may be necessary to implement compensatory actions, or to address unforeseen circumstances related to the "A" RHR pump motor replacement.

3.6 CONTAINMENT SYSTEMS

3.6.4.3 Standby Gas Treatment (SGT) System

LCO 3.6.4.3 Two SGT subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
During movement of recently irradiated fuel assemblies in
the secondary containment.

-----NOTE-----
"Recently irradiated" is defined for Technical Specification 3.6.4.3 as
fuel assemblies which have occupied part of a critical reactor core
within the previous 24 hours.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One SGT subsystem inoperable.	A.1 Restore SGT subsystem to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met in MODE 1, 2, or 3.	B.1 Be in MODE 3.	12 hours
	<u>AND</u> B.2 Be in MODE 4.	36 hours
C. Required Action and associated Completion Time of Condition A not met in during movement of recently irradiated fuel assemblies in the secondary containment.	-----NOTE----- LCO 3.0.3 is not applicable. -----	Immediately (continued)
	C.1 Place OPERABLE SGT subsystem in operation. <u>OR</u>	

3.7 PLANT SYSTEMS

3.7.3 Control Room Emergency Ventilation Air Supply (CREVAS) System

LCO 3.7.3 Two CREVAS subsystems shall be OPERABLE.

----- NOTE -----
The control room envelope (CRE) boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, and 3,
During movement of recently irradiated fuel assemblies in the secondary containment.

----- NOTE -----
“Recently irradiated” is defined for Technical Specification 3.7.3 as fuel assemblies which have occupied part of a critical reactor core within the previous 104 hours.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CREVAS subsystem inoperable for reasons other than Condition B.	A.1 Restore CREVAS subsystem to OPERABLE status.	7 days
B. One or more CREVAS subsystems inoperable due to inoperable CRE boundary in MODE 1, 2, or 3.	B.1 Initiate action to implement mitigating actions.	Immediately
	<u>AND</u>	
	B.2 Verify mitigating actions ensure CRE occupant exposures to radiological, chemical, and smoke hazards will not exceed limits.	24 hours
	<u>AND</u>	
	B.3 Restore CRE boundary to OPERABLE status.	90 days

(continued)

3.7 PLANT SYSTEMS

3.7.4 Control Room Air Conditioning (AC) System

LCO 3.7.4 Two control room AC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
During movement of recently irradiated fuel assemblies in the
secondary containment.

-----NOTE-----
"Recently irradiated" is defined for Technical Specification 3.7.4 as
fuel assemblies which have occupied part of a critical reactor core
within the previous 104 hours.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One control room AC subsystem inoperable.	A.1 Restore control room AC subsystem to OPERABLE status.	30 days
B. Two control room AC subsystems inoperable.	B.1 Verify control room area temperature < 90°F.	Once per 4 hours
	<u>AND</u> B.2 Restore one control room AC subsystem to OPERABLE status.	72 hours
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1 Be in MODE 3.	12 hours
	<u>AND</u> C.2 Be in MODE 4.	36 hours

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.2 AC Sources - Shutdown

- LCO 3.8.2 The following AC electrical power sources shall be OPERABLE:
- a. One qualified circuit between the offsite transmission network and one division of the plant Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8, "Distribution Systems-Shutdown";
 - b. One qualified circuit, which maybe the same circuit required by LCO 3.8.2.a, between the offsite transmission network and the other division of the plant Class 1E AC electrical power distribution subsystem(s), when a second division is required by LCO 3.8.8; and
 - c. One emergency diesel generator (EDG) subsystem capable of supplying one division of the plant Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8.

APPLICABILITY: MODES 4 and 5,
During movement of recently irradiated fuel assemblies in the secondary containment.

-----NOTE-----
"Recently irradiated" is defined for Technical Specification 3.8.2 as fuel assemblies which have occupied part of a critical reactor core within the previous 104 hours.

3.8 ELECTRICAL POWER SYSTEMS

3.8.5 DC Sources - Shutdown

LCO 3.8.5 One 125 VDC electrical power subsystem shall be OPERABLE to support one division of the plant Class IE DC Electrical Power Distribution System required by LCO 3.8.8, "Distribution Systems – Shutdown."

APPLICABILITY: MODES 4 and 5,
During movement of recently irradiated fuel assemblies in the secondary containment.

-----**NOTE**-----
 "Recently irradiated" is defined for Technical Specification 3.8.5 as fuel assemblies which have occupied part of a critical reactor core within the previous 104 hours.

ACTIONS

-----**NOTE**-----
 LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Required DC electrical power subsystem inoperable.	A.1 Declare affected required feature(s) inoperable.	Immediately
	<u>OR</u>	
	A.2.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	A.2.2 Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately
	<u>AND</u>	
		(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.8 Distribution Systems - Shutdown

LCO 3.8.8 The necessary portions of the AC and 125 VDC electrical power distribution subsystems shall be OPERABLE to support equipment required to be OPERABLE.

APPLICABILITY: MODES 4 and 5,
During movement of recently irradiated fuel assemblies in the secondary containment.

-----NOTE-----
 "Recently irradiated" is defined for Technical Specification 3.8.8 as fuel assemblies which have occupied part of a critical reactor core within the previous 104 hours.

ACTIONS

-----NOTE-----
 LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required AC or 125 VDC electrical power distribution subsystems inoperable.	A.1 Declare associated supported required feature(s) inoperable.	Immediately
	<u>OR</u>	
	A.2.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	A.2.2 Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately
	<u>AND</u>	
		(continued)

ATTACHMENT 2

License Amendment Request

James A. FitzPatrick Nuclear Power Plant

Docket No. 50-333

PROPOSED TECHNICAL SPECIFICATION CHANGES (CLEAN PAGES)

Facility Operating License (FOL) Page

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3.8.5-1

3.8.8-1

- (3) Constellation Energy Generation, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use, at any time, any byproduct, source, and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;
 - (4) Constellation Energy Generation, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use, at any time, any byproduct, source, and special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration; or associated with radioactive apparatus, components or tools.
 - (5) Constellation Energy Generation, LLC, pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- C. This renewed operating license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- (1) Maximum Power Level
Constellation Energy Generation, LLC is authorized to operate the facility at steady state reactor core power levels not in excess of 2536 megawatts (thermal).
 - (2) Technical Specifications
The Technical Specifications contained in Appendix A, as revised through Amendment No. , are hereby incorporated in the renewed operating license. The licensee shall operate the facility in accordance with the Technical Specifications.

Secondary Containment Isolation Instrumentation
3.3.6.2

Table 3.3.6.2-1 (page 1 of 1)
Secondary Containment Isolation Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Reactor Vessel Water Level - Low (Level 3)	1, 2, 3	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.5 SR 3.3.6.2.6	≥ 177 inches
2. Drywell Pressure - High	1, 2, 3	2	SR 3.3.6.2.1 SR 3.3.6.2.2 SR 3.3.6.2.4 SR 3.3.6.2.5 SR 3.3.6.2.6	≤ 2.7 psig
3. Reactor Building Exhaust Radiation - High	1, 2, 3, (a)	1	SR 3.3.6.2.1 SR 3.3.6.2.3 SR 3.3.6.2.6	≤ 24,800 cpm
4. Refueling Floor Exhaust Radiation - High	1, 2, 3, (a)	1	SR 3.3.6.2.1 SR 3.3.6.2.3 SR 3.3.6.2.6	≤ 24,800 cpm

(a) During movement of recently irradiated fuel assemblies in secondary containment. "Recently irradiated" is defined for Technical Specification 3.3.6.2 as fuel assemblies which have occupied part of a critical reactor core within the previous 24 hours.

3.3 INSTRUMENTATION

3.3.7.1 Control Room Emergency Ventilation Air Supply (CREVAS) System Instrumentation

LCO 3.3.7.1 The Control Room Air Inlet Radiation – High channel shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3,
During movement of recently irradiated fuel assemblies in the secondary containment.

-----NOTE-----
 “Recently irradiated” is defined for Technical Specification 3.3.7.1 as fuel assemblies which have occupied part of a critical reactor core within the previous 104 hours.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Channel inoperable.	A.1 Place the CREVAS System in the isolate mode of operation.	1 hour
	<u>OR</u>	
	A.2 Declare both CREVAS subsystems inoperable.	1 hour

3.6 CONTAINMENT SYSTEMS

3.6.4.1 Secondary Containment

LCO 3.6.4.1 The secondary containment shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
During movement of recently irradiated fuel assemblies in
the secondary containment.

-----NOTE-----
“Recently irradiated” is defined for Technical Specification 3.6.4.1 as
fuel assemblies which have occupied part of a critical reactor core
within the previous 24 hours.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Secondary containment inoperable in MODE 1, 2, or 3.	A.1 Restore secondary containment to OPERABLE status.	4 hours*
B. Required Action and associated Completion Time of Condition A not met.	B.1 Be in MODE 3.	12 hours
	<u>AND</u> B.2 Be in MODE 4.	36 hours
C. Secondary containment inoperable during movement of recently irradiated fuel assemblies in the secondary containment.	C.1 -----NOTE----- LCO 3.0.3 is not applicable. ----- Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately

* The Completion Time is extended to 30 hours, in support of the “A” RHR pump repairs, contingent on implementation of Compensatory Actions stated in Section 3.4 of letter JAFP-21-0053, dated June 14, 2021, as a one-time only change ending upon restoration of the “A” RHR pump to OPERABLE, or on July 11, 2021 at 20:00 hours. Multiple entries may be necessary to implement compensatory actions, or to address unforeseen circumstances related to the “A” RHR pump motor replacement.

3.6 CONTAINMENT SYSTEMS

3.6.4.2 Secondary Containment Isolation Valves (SCIVs)

LCO 3.6.4.2 Each SCIV shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
During movement of recently irradiated fuel assemblies in
the secondary containment.

-----NOTE-----
"Recently irradiated" is defined for Technical Specification 3.6.4.2 as
fuel assemblies which have occupied part of a critical reactor core
within the previous 24 hours.

ACTIONS

- NOTES-----
1. Penetration flow paths may be unisolated intermittently under administrative controls.
 2. Separate Condition entry is allowed for each penetration flow path.
 3. Enter applicable Conditions and Required Actions for systems made inoperable by inoperable SCIVs.
-

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more penetration flow paths with one SCIV inoperable.	A.1 Isolate the affected penetration flow path by use of at least one closed and de-activated automatic valve, closed manual valve, or blind flange.	8 hours
	<u>AND</u>	(continued)

3.6 CONTAINMENT SYSTEMS

3.6.4.3 Standby Gas Treatment (SGT) System

LCO 3.6.4.3 Two SGT subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
During movement of recently irradiated fuel assemblies in
the secondary containment.

-----NOTE-----
“Recently irradiated” is defined for Technical Specification 3.6.4.3 as
fuel assemblies which have occupied part of a critical reactor core
within the previous 24 hours.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One SGT subsystem inoperable.	A.1 Restore SGT subsystem to OPERABLE status.	7 days
B. Required Action and associated Completion Time of Condition A not met in MODE 1, 2, or 3.	B.1 Be in MODE 3.	12 hours
	<u>AND</u> B.2 Be in MODE 4.	36 hours
C. Required Action and associated Completion Time of Condition A not met in during movement of recently irradiated fuel assemblies in the secondary containment.	-----NOTE----- LCO 3.0.3 is not applicable. -----	Immediately (continued)
	C.1 Place OPERABLE SGT subsystem in operation. <u>OR</u>	

3.7 PLANT SYSTEMS

3.7.3 Control Room Emergency Ventilation Air Supply (CREVAS) System

LCO 3.7.3 Two CREVAS subsystems shall be OPERABLE.

----- NOTE -----
The control room envelope (CRE) boundary may be opened intermittently under administrative control.

APPLICABILITY: MODES 1, 2, and 3,
During movement of recently irradiated fuel assemblies in the secondary containment.

----- NOTE -----
“Recently irradiated” is defined for Technical Specification 3.7.3 as fuel assemblies which have occupied part of a critical reactor core within the previous 104 hours.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One CREVAS subsystem inoperable for reasons other than Condition B.	A.1 Restore CREVAS subsystem to OPERABLE status.	7 days
B. One or more CREVAS subsystems inoperable due to inoperable CRE boundary in MODE 1, 2, or 3.	B.1 Initiate action to implement mitigating actions.	Immediately
	<u>AND</u>	
	B.2 Verify mitigating actions ensure CRE occupant exposures to radiological, chemical, and smoke hazards will not exceed limits.	24 hours
	<u>AND</u>	
	B.3 Restore CRE boundary to OPERABLE status.	90 days

(continued)

3.7 PLANT SYSTEMS

3.7.4 Control Room Air Conditioning (AC) System

LCO 3.7.4 Two control room AC subsystems shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3,
During movement of recently irradiated fuel assemblies in the
secondary containment.

-----NOTE-----
"Recently irradiated" is defined for Technical Specification 3.7.4 as
fuel assemblies which have occupied part of a critical reactor core
within the previous 104 hours.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One control room AC subsystem inoperable.	A.1 Restore control room AC subsystem to OPERABLE status.	30 days
B. Two control room AC subsystems inoperable.	B.1 Verify control room area temperature < 90°F.	Once per 4 hours
	<u>AND</u> B.2 Restore one control room AC subsystem to OPERABLE status.	72 hours
C. Required Action and associated Completion Time of Condition A or B not met in MODE 1, 2, or 3.	C.1 Be in MODE 3.	12 hours
	<u>AND</u> C.2 Be in MODE 4.	36 hours

(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.2 AC Sources - Shutdown

- LCO 3.8.2 The following AC electrical power sources shall be OPERABLE:
- a. One qualified circuit between the offsite transmission network and one division of the plant Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8, "Distribution Systems-Shutdown";
 - b. One qualified circuit, which maybe the same circuit required by LCO 3.8.2.a, between the offsite transmission network and the other division of the plant Class 1E AC electrical power distribution subsystem(s), when a second division is required by LCO 3.8.8; and
 - c. One emergency diesel generator (EDG) subsystem capable of supplying one division of the plant Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8.

APPLICABILITY: MODES 4 and 5,
During movement of recently irradiated fuel assemblies in the secondary containment.

-----NOTE-----
"Recently irradiated" is defined for Technical Specification 3.8.2 as fuel assemblies which have occupied part of a critical reactor core within the previous 104 hours.

3.8 ELECTRICAL POWER SYSTEMS

3.8.5 DC Sources - Shutdown

LCO 3.8.5 One 125 VDC electrical power subsystem shall be OPERABLE to support one division of the plant Class IE DC Electrical Power Distribution System required by LCO 3.8.8, "Distribution Systems – Shutdown."

APPLICABILITY: MODES 4 and 5,
During movement of recently irradiated fuel assemblies in the secondary containment.

----- NOTE -----
"Recently irradiated" is defined for Technical Specification 3.8.5 as fuel assemblies which have occupied part of a critical reactor core within the previous 104 hours.

ACTIONS

----- NOTE -----
LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. Required DC electrical power subsystem inoperable.	A.1 Declare affected required feature(s) inoperable.	Immediately
	<u>OR</u>	
	A.2.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	A.2.2 Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately
	<u>AND</u>	
		(continued)

3.8 ELECTRICAL POWER SYSTEMS

3.8.8 Distribution Systems - Shutdown

LCO 3.8.8 The necessary portions of the AC and 125 VDC electrical power distribution subsystems shall be OPERABLE to support equipment required to be OPERABLE.

APPLICABILITY: MODES 4 and 5,
During movement of recently irradiated fuel assemblies in the secondary containment.

----- NOTE -----
“Recently irradiated” is defined for Technical Specification 3.8.8 as fuel assemblies which have occupied part of a critical reactor core within the previous 104 hours.

ACTIONS

----- NOTE -----
LCO 3.0.3 is not applicable.

CONDITION	REQUIRED ACTION	COMPLETION TIME
A. One or more required AC or 125 VDC electrical power distribution subsystems inoperable.	A.1 Declare associated supported required feature(s) inoperable.	Immediately
	<u>OR</u>	
	A.2.1 Suspend CORE ALTERATIONS.	Immediately
	<u>AND</u>	
	A.2.2 Suspend movement of recently irradiated fuel assemblies in the secondary containment.	Immediately
	<u>AND</u>	
		(continued)