

### UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 3, 2025

Delson C. Erb Vice President, OPS Support Tennessee Valley Authority 1101 Market Street, LP 4A-C Chattanooga, TN 37402-2801

SUBJECT: SEQUOYAH NUCLEAR PLANT, UNITS 1 AND 2 - ISSUANCE OF

AMENDMENT NOS. 369 AND 363 REGARDING A REVISION TO TECHNICAL

SPECIFICATIONS 3.8.1 AND 3.8.2 (EPID L-2024-LLA-0047)

#### Dear Delson Erb:

The U.S. Nuclear Regulatory Commission (NRC, the Commission) has issued the enclosed Amendment Nos. 369 and 363 to Renewed Facility Operating License Nos. DPR-77 and DPR-79, for the Sequoyah Nuclear Plant, Units 1 and 2 (Sequoyah), respectively. The amendments consist of changes to the Sequoyah technical specifications (TSs) in response to the Tennessee Valley Authority application dated April 15, 2024 (Agencywide Documents Access and Management System Accession No. ML24106A057).

The amendments revise Sequoyah TS 3.8.1, "AC [alternating current] Sources - Operating," to delete Surveillance Requirement (SR) 3.8.1.8, and revise TS 3.8.2, "AC Sources - Shutdown," to delete the reference to SR 3.8.1.8.

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A copy of the Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's monthly *Federal Register* notice.

Sincerely,

/RA/

Perry H. Buckberg, Senior Project Manager Plant Licensing Branch II-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Docket Nos. 50-327 and 50-328

#### Enclosures:

1. Amendment No. 369 to DPR-77

2. Amendment No. 363 to DPR-79

3. Safety Evaluation



# UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

#### TENNESSEE VALLEY AUTHORITY

#### **DOCKET NO. 50-327**

#### SEQUOYAH NUCLEAR PLANT, UNIT 1

#### AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 369 Renewed License No. DPR-77

- 1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Tennessee Valley Authority (the licensee) dated April 15, 2024, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in Title 10 of the Code of Federal Regulations (10 CFR) Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Renewed Facility Operating License No. DPR-77 is hereby amended to read as follows:

#### (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 369 are hereby incorporated into the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

David Wrona, Chief Plant Licensing Branch II-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Date of Issuance: February 3, 2025

#### ATTACHMENT TO LICENSE AMENDMENT NO. 369

#### SEQUOYAH NUCLEAR PLANT, UNIT 1

#### RENEWED FACILITY OPERATING LICENSE NO. DPR-77

#### **DOCKET NO. 50-327**

Replace page 3 of Renewed Facility Operating License No. DPR-77 with the attached page 3. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

Replace the following pages of the Appendix A, Technical Specifications, with the attached pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove	<u>Insert</u>
3.8.1-8	3.8.1-8
3.8.2-3	3.8.2-3

- (3) 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) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the Sequoyah and Watts Bar Unit 1 Nuclear Plants.
- C. This renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I 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) <u>Maximum Power Level</u>

The Tennessee Valley Authority is authorized to operate the facility at reactor core power levels not in excess of 3455 megawatts thermal.

#### (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 369 are hereby incorporated into the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications.

#### (3) <u>Initial Test Program</u>

The Tennessee Valley Authority shall conduct the post-fuel-loading initial test program (set forth in Section 14 of Tennessee Valley Authority's Final Safety Analysis Report, as amended), without making any major modifications of this program unless modifications have been identified and have received prior NRC approval. Major modifications are defined as:

- a. Elimination of any test identified in Section 14 of TVA's Final Safety Analysis Report as amended as being essential;
- Modification of test objectives, methods, or acceptance criteria for any test identified in Section 14 of TVA's Final Safety Analysis Report as amended as being essential;

#### SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.8.1.8	Not used.	
SR 3.8.1.9	If performed with the DG synchronized with offsite power, it shall be performed at a power factor ≤ 0.89. However, if grid conditions do not permit, the power factor limit is not required to be met. Under this condition the power factor shall be maintained as close to the limit as practicable.  Verify each DG rejects a load greater than or equal to its associated single largest post-accident load, and:  a. Following load rejection, the frequency is ≤ 66.5 Hz,  b. Within 3 seconds following load rejection, the voltage is ≥ 6800 V and ≤ 7260 V, and  c. Within 3 seconds following load rejection, the frequency is ≥ 59.8 Hz and ≤ 60.2 Hz.	In accordance with the Surveillance Frequency Control Program

#### SURVEILLANCE REQUIREMENTS

	FREQUENCY	
SURVEILLANCE  SR 3.8.2.1 NOTE The following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.9 through SR 3.8.1.11, and SR 3.8.1.13 through SR 3.8.1.17.  For AC sources required to be OPERABLE, the SRs of Specification 3.8.1, "AC Sources - Operating," except SR 3.8.1.12, SR 3.8.1.18, and SR 3.8.1.19, are applicable.		In accordance with applicable SRs



# UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555-0001

#### TENNESSEE VALLEY AUTHORITY

#### **DOCKET NO. 50-328**

#### SEQUOYAH NUCLEAR PLANT, UNIT 2

#### AMENDMENT TO RENEWED FACILITY OPERATING LICENSE

Amendment No. 363 Renewed License No. DPR-79

- 1. The U.S. Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Tennessee Valley Authority (the licensee) dated April 15, 2024, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in Title 10 of the *Code of Federal Regulations* (10 CFR) Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Renewed Facility Operating License No. DPR-79 is hereby amended to read as follows:

#### (2) <u>Technical Specifications</u>

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 363 are hereby incorporated into the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of the date of its issuance and shall be implemented within 60 days.

FOR THE NUCLEAR REGULATORY COMMISSION

David Wrona, Chief Plant Licensing Branch II-2 Division of Operating Reactor Licensing Office of Nuclear Reactor Regulation

Date of Issuance: February 3, 2025

#### ATTACHMENT TO LICENSE AMENDMENT NO. 363

#### SEQUOYAH NUCLEAR PLANT, UNIT 2

#### RENEWED FACILITY OPERATING LICENSE NO. DPR-79

#### **DOCKET NO. 50-328**

Replace page 3 of Renewed Facility Operating License No. DPR-79 with the attached page 3. The revised page is identified by amendment number and contains a marginal line indicating the area of change.

Replace the following pages of the Appendix A, Technical Specifications, with the attached pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

<u>Remove</u>	<u>Insert</u>
3.8.1-8	3.8.1-8
3.8.2-3	3.8.2-3

- (3) 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) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to receive, possess, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) Pursuant to the Act and 10 CFR Parts 30, 40 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the Sequoyah and Watts Bar Unit 1 Nuclear Plants.
- C. This renewed license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations set forth in 10 CFR Chapter I 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

The Tennessee Valley Authority is authorized to operate the facility at reactor core power levels not in excess of 3455 megawatts thermal.

#### (2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 363 are hereby incorporated into the renewed license. The licensee shall operate the facility in accordance with the Technical Specifications.

#### (3) Initial Test Program

The Tennessee Valley Authority shall conduct the post-fuel-loading initial test program (set forth in Section 14 of Tennessee Valley Authority's Final Safety Analysis Report, as amended), without making any major modifications of this program unless modifications have been identified and have received prior NRC approval. Major modifications are defined as:

a. Elimination of any test identified in Section 14 of TVA's Final Safety Analysis Report as amended as being essential;

#### SURVEILLANCE REQUIREMENTS (continued)

	SURVEILLANCE	FREQUENCY
SR 3.8.1.8	Not used.	
SR 3.8.1.9 NOTE		In accordance with the Surveillance Frequency Control Program

#### SURVEILLANCE REQUIREMENTS

	FREQUENCY	
SURVEILLANCE  SR 3.8.2.1 NOTE The following SRs are not required to be performed: SR 3.8.1.3, SR 3.8.1.9 through SR 3.8.1.11, and SR 3.8.1.13 through SR 3.8.1.17.  For AC sources required to be OPERABLE, the SRs of Specification 3.8.1, "AC Sources - Operating," except SR 3.8.1.12, SR 3.8.1.18, and SR 3.8.1.19, are applicable.		In accordance with applicable SRs



# UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

# SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION AMENDMENT NO. 369 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-77 AMENDMENT NO. 363 TO RENEWED FACILITY OPERATING LICENSE NO. DPR-79 SEQUOYAH NUCLEAR PLANT, UNITS 1 AND 2

TENNESSEE VALLEY AUTHORITY

DOCKET NOS. 50-327 AND 50-328

#### 1.0 INTRODUCTION

By application dated April 15, 2024 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML24106A057), Tennessee Valley Authority (TVA, the licensee) submitted a license amendment request (LAR) for Renewed Facility Operating License Numbers DPR-77 and DPR-79 for Sequoyah Nuclear Plant (Sequoyah or SQN), Units 1 and 2. The proposed amendments would revise the Technical Specification (TS) 3.8.1, "AC Sources - Operating," to delete Surveillance Requirement (SR) 3.8.1.8, and to revise TS 3.8.2, "AC Sources - Shutdown," to delete the reference to SR 3.8.1.8.

This proposed license amendment would delete the requirement for verification of the automatic and manual transfers of the power supply to each 6.9-kilovolt (kV) Unit Board from the normal power supply to the alternate offsite power supply.

#### 2.0 REGULATORY EVALUATION

#### 2.1 Offsite Power System

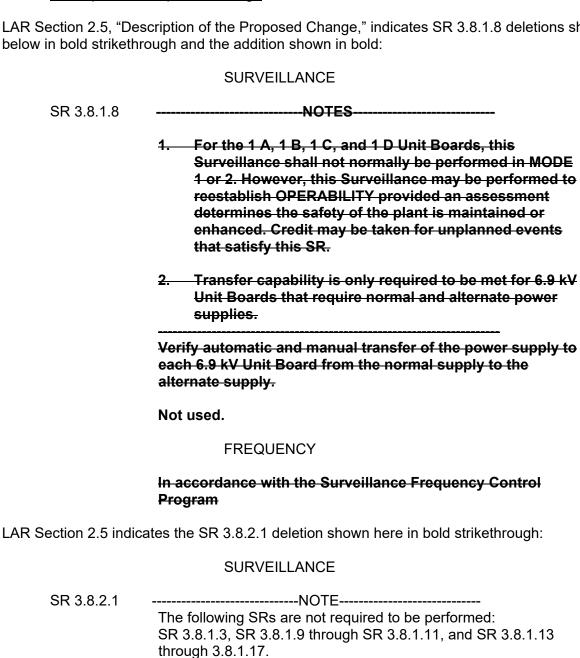
LAR Section 2.1, "System Design and Operation," states, in part, that offsite preferred electric power is supplied by two physically and electrically independent circuits; for Sequoyah Unit 1 (500-kV switchyard), and for Sequoyah Unit 2 (161-kV switchyard) through separate transformers to the onsite electrical distribution system. Under normal configuration, for a maingenerator trip, the generator circuit breaker (GCB) opens, and offsite (preferred) power is supplied from the 161-kV switchyard (for Unit 2) or from the 500-kV switchyard (for Unit 1) through the Unit Station Service Transformers (USSTs) to the 6.9-kV Unit Boards. Power is then routed by two independent circuits from the 6.9-kV Boards to the 6.9-kV Shutdown Boards for each unit.

#### 2.2 Reasons for the Proposed Change

LAR Section 2.4, "Reasons for Proposed Change," states, in part, that during a Design Bases Assurance Inspection (DBAI) in 2019, an NRC inspector found that the existing SR 3.8.1.1 required an analysis of a bus transfer simulating a GCB failure during an accident. Upon further review, it was determined that there was no supporting analysis. This was documented by NRC as a non-cited violation (NCV) in Nuclear Regulatory Commission (NRC) letter to TVA dated April 25, 2019 (ML19115A223). TVA found, during resolution of the NCV, that GCB operation can be credited during an accident.

#### 2.3 Description of Proposed Change

LAR Section 2.5, "Description of the Proposed Change," indicates SR 3.8.1.8 deletions shown below in bold strikethrough and the addition shown in bold:



For AC sources required to be OPERABLE, the SRs of Specification 3.8.1, "AC Sources Operating," except **SR 3.8.1.8** SR 3.8.1.12, SR 3.8.1.18, and SR 3.8.1.19, are applicable.

#### FREQUENCY

In accordance with applicable SRs

LAR Attachment 1 provides a marked-up version of the affected pages of SQN, Units 1 and 2, TS 3.8.1 and TS 3.8.2 showing the proposed changes. LAR Attachment 2 provides a marked-up version of the SQN Units 1 and 2, TS 3.8.1 and TS 3.8.2 Bases. Changes to the existing TS Bases are provided for information only and will be implemented under the Technical Specification Bases Control Program.

#### 2.4 Regulatory Requirements and Guidance

The NRC staff considered the following regulatory requirements and guidance in reviewing the proposed license amendments:

The regulation in Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36, "Technical Specifications," paragraph (c)(3), states:

Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met.

The regulation in 10 CFR Part 50, Appendix A, "General Design Criteria for Nuclear Power Plants," General Design Criterion (GDC) 17, "Electric power systems," states, in part:

An onsite electric power system and an offsite electric power system shall be provided to permit functioning of structures, systems, and components important to safety. The safety function for each system (assuming the other system is not functioning) shall be to provide sufficient capacity and capability to assure that (1) specified acceptable fuel design limits and design conditions of the reactor coolant pressure boundary are not exceeded as a result of anticipated operational occurrences and (2) the core is cooled and containment integrity and other vital functions are maintained in the event of postulated accidents.

The onsite electric power supplies, including the batteries, and the onsite electric distribution system, shall have sufficient independence, redundancy, and testability to perform their safety functions assuming a single failure.

Compliance with the regulatory position expressed in Regulatory Guide (RG) 1.32, Revision 2, "Criteria for Safety-Related Electric Power Systems for Nuclear Power Plants," is described in Section 8.2.1.5, "Switchyard Control and Relaying," of the Sequoyah Updated Final Safety Analysis Report (UFSAR).

#### 3.0 <u>TECHNICAL EVALUATION</u>

LAR Section 3.1, "Generator Circuit Breakers (GCBs)," states in part, that TVA installed and connected new GCBs and modified the USSTs in 2012 (for Unit 2) and in 2013 (for Unit 1). Each unit's GCB will open for a main generator trip and isolate its main generator from the USSTs, which enables these transformers to be energized from the electrical power grid.

LAR Section 2.4, states in part, that during the resolution of the NCV noted previously from DBAI in 2019, TVA determined that GCB operation can be credited during accident conditions. Therefore, the licensee proposed SR 3.8.1.8 should be removed as no automatic or manual transfer from the USSTs to the Comon Station Service Transformers (CSSTs) is required during accident conditions.

LAR Section 3.2, "Compliance with GDC 17 without SR 3.8.1.8," states in part, that the proposed change to delete SR 3.8.1.8 complies with GDC 17. The offsite power source consists of two physically independent circuits. The availability of these two qualified circuits does not require that the power supply transfers be verified by SR 3.8.1.8.

In LAR Section 3.1, TVA states that the NRC safety evaluation for the 2012 LAR states, in part, that the proposed GCBs have the capability of interrupting the system maximum available fault current and allow immediate access for offsite power circuits to supply onsite distribution circuits in accordance with GDC 17 and meet the guidance provided in IEEE Std C37.013 and NUREG-0800, Section 8.2, "Offsite Power System," Appendix A, "Guidelines for Generator Circuit Breakers/Load Break Switches." The staff also noted that continued compliance with the GDC 17 provides assurance that the facility operates within the safety limits.

LAR Section 3.3, "Requirements for Having a Technical Specification Surveillance," states, in part, that the proposed change to delete SR 3.8.1.8 complies with the requirements of 10 CFR 50.36(c)(3) which describes surveillance requirements as "relating to test, calibration, or inspection" to assure that (1) the necessary quality of systems and components is maintained, (2) facility operation will be within safety limits and, (3) the limiting conditions for operation (LCO) will be met. Per the licensee, verifications in SR 3.8.1.8 are not required to comply with these three items as:

- All Quality Assurance standards described in Sequoyah UFSAR Chapter 8, "Electric Power," will continue to be met if the surveillance described in SR 3.8.1.8 is deleted as proposed.
- Continued compliance with GDC 17, as previously discussed without the need for the surveillance described in SR 3.8.1.8, assures that facility operation will be within safety limits.
- The applicable limiting condition for operation is LCO 3.8.1, which requires two qualified circuits between the offsite transmission network and the onsite Class 1E AC electrical power distribution system to be operable. As previously described in [LAR] Section 2.1, this is provided by the design of Sequoyah's offsite power system. This LCO will continue to be met if the surveillance described in SR 3.8.1.8 is deleted as proposed.

LAR Section 4.1, "Applicable Regulatory Requirements and Criteria," states, in part, that compliance with the regulatory position expressed in RG 1.32, Revision 2 is described in Section 8.2.1.5 of the Sequeyah UFSAR. Therefore, the NRC staff notes there is continued

compliance with RG 1.32, Revision 2, since no changes were made to alter what is stated in Section 8.2.1.5 of the Sequoyah UFSAR.

LAR Section 4.2, "Precedent," states, in part, that the licensee provided a list of precedents of Westinghouse-designed nuclear power plants that do not have an SR for verifying transfer of AC power sources from normal offsite circuit to an alternate offsite circuit. The NRC staff notes that this demonstrates the proposed removal of SR 3.8.1.8 is consistent with other existing Westinghouse-designed plants.

In addition, the NRC staff notes that the deletion of reference to SR 3.8.1.8 in SR 3.8.2.1 has less safety implications than implementing SR 3.8.1.8 since the plant is shutdown in either Mode 5 or 6 and SR 3.8.1.8 is not even invoked for SR 3.8.2.1.

#### 3.1 Technical Conclusion

The NRC staff reviewed the LAR, UFSAR, and TS, and confirmed the applicant's statements. Based on the information provided, the NRC staff finds that (1) the onsite and offsite electrical power systems will remain in compliance with GDC 17 criterion, and in conformance with RG 1.32 with Sequoyah operating within its safety limits; (2) that the integrity of each generator circuit breaker was verified when tripped, permitting the transfer from normal to alternate power sources; and (3) that the precedents provided by the licensee are similar to Sequoyah and do not require an SR such as SR 3.8.1.8. The staff also finds that the TS, as amended by the proposed change, will continue to meet the requirements of 10 CFR 50.36(c)(3) because the remaining SRs will continue to provide assurance that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met. Therefore, the staff concludes that the deletion of SR 3.8.1.8 and deletion of the reference to SR 3.8.1.8 in SR 3.8.2.1 are acceptable, and the LAR can be implemented.

#### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Tennessee State official was notified of the proposed issuance of the amendments on December 2, 2024. The State official had no comments.

#### 5.0 ENVIRONMENTAL CONSIDERATION

The amendments change a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendments involve no significant hazards consideration, originally published in the *Federal Register* on May 14, 2024 (89 FR 42000). There has been no public comment on such finding. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendments.

#### 6.0 CONCLUSION

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

Principal Contributors: E. Kleeh, NRR

H. Kadoli, NRR

Date: February 3, 2025

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SEQUOYAH NUCLEAR PLANT, UNITS 1 AND 2 - ISSUANCE OF SUBJECT:

AMENDMENT NOS. 369 AND 363 REGARDING A REVISION TO TECHNICAL

SPECIFICATIONS 3.8.1 AND 3.8.2 (EPID L-2024-LLA-0047) DATED

**FEBRUARY 3, 2025** 

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#### NRR-058

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