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June 4, 2026

L-PI-26-001
10 CFR 50.90

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

Prairie Island Nuclear Generating Plant, Units 1 and 2
Docket Nos. 50-282 and 50-306
Renewed Facility Operating License Nos. DPR-42 and DPR-60

Application to Revise Technical Specifications to Adopt TSTF-596, "Expand the Applicability of the Surveillance Frequency Control Program (SFCP)"

Pursuant to 10 CFR 50.90, Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), is submitting a request for an amendment to the Technical Specifications (TS) for the Prairie Island Nuclear Generating Plant (PINGP) Units 1 and 2.

NSPM requests adoption of TSTF-596, "Expand the Applicability of the Surveillance Frequency Control Program (SFCP)," which is an approved change to the Standard Technical Specifications (STS), into the PINGP Units 1 and 2 TS. TSTF-596 expands the applicability of the SFCP to include other periodic testing frequencies in TS. The proposed change also revises the SFCP to reference additional regulatory mechanisms that may be used to control Surveillance Frequencies, such as 10 CFR 50.55a and 10 CFR 50.69. The proposed change revises Surveillance Requirements (SRs) that reference the Inservice Testing (IST) Program to instead reference the SFCP.

The proposed change also revises TS Table 3.3.1-1, Reactor Trip System Instrumentation, Function 6, Overtemperature ΔT , and Function 7, Overpower ΔT , Allowable Values to correct editorial errors with the pages referenced.

The Enclosure provides a description and assessment of the proposed TS changes. Enclosure Attachment 1 provides the existing TS pages marked to show the proposed changes. Enclosure Attachment 2 provides TS Bases pages marked to show revised text associated with the proposed TS changes and is provided for information only.

NSPM requests that the amendment be reviewed under the Consolidated Line Item Improvement Process (CLIIP). Once approved, the amendment shall be implemented within 90 days.

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In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Minnesota Official.

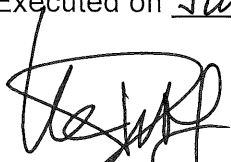
If you have any questions regarding this submittal, please contact Mr. Jeff Kivi at (612) 330-5788 or at Jeffrey.L.Kivi@xcelenergy.com.

Summary of Commitments

This letter makes no new commitments and no revisions to existing commitments.

I declare under penalty of perjury, that the foregoing is true and correct.

Executed on June 4, 2026



Werner K. Pauhardt, Jr.
Site Vice President, Prairie Island Nuclear Generating Plant
Northern States Power Company – Minnesota

Enclosure

cc: Administrator, Region III, USNRC
Project Manager, Prairie Island, USNRC
Resident Inspector, Prairie Island, USNRC
State of Minnesota

DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), requests adoption of TSTF-596, "Expand the Applicability of the Surveillance Frequency Control Program (SFCP)," which is an approved change to the Standard Technical Specifications (STS), into the Prairie Island Nuclear Generating Plant (PINGP) Units 1 and 2 Technical Specifications (TS). TSTF-596 expands the applicability of the SFCP to include other periodic testing frequencies in TS. The proposed change also revises the SFCP to reference additional regulatory mechanisms that may be used to control Surveillance Frequencies, such as 10 CFR 50.55a and 10 CFR 50.69. The proposed change revises Surveillance Requirements (SRs) that reference the Inservice Testing (IST) Program to instead reference the SFCP.

The proposed change also revises TS Table 3.3.1-1, Reactor Trip System Instrumentation, Function 6, Overtemperature ΔT , and Function 7, Overpower ΔT , Allowable Values to correct editorial errors with the pages referenced.

2.0 ASSESSMENT

2.1 Applicability of Safety Evaluation

NSPM has reviewed the safety evaluation for TSTF-596 provided to the Technical Specifications Task Force in a letter dated December 30, 2024. This review included the NRC staff's evaluation, as well as the information provided in TSTF-596. NSPM has concluded that the justifications presented in TSTF-596 and the safety evaluation prepared by the NRC staff are applicable to PINGP Units 1 and 2 and justify this amendment for the incorporation of the changes to the PINGP TS.

NSPM confirms that the SFCP shall contain a list of the frequencies controlled by the program, including Frequencies of Surveillances that implement the requirements of 10 CFR 50.55a(f).

2.2 Variations

The proposed changes include a correction to editorial errors on TS Table 3.3.1-1, Function 6 and Function 7, Allowable Value entries, which refer to Notes on subsequent pages, but identify the incorrect page numbers.

Differences between PINGP TS and the STS on which TSTF-596 is based including differences in numbering, titles, and content in TS and Bases are described in detail below:

PINGP TS	Short Title	TSTF-596/STS SR	Difference or Variation
TS 1.1	Definitions	Deletes STS 1.1 Definition of Inservice Testing Program.	Not applicable to PINGP TS. NSPM did not adopt TSTF-545, and, as such, has no definition of Inservice Testing Program to delete.
SR 3.0.2 Bases	SR Applicability	Replaces discussion of American Society of Mechanical Engineers (ASME) Operation and Maintenance Code with 10 CFR 50.55a(f).	NSPM did not adopt TSTF-545 into the PINGP TS, but proposes to include this discussion as revised by TSTF-596.
SR 3.0.3 Bases	SR Applicability	TSTF-545 added a paragraph to SR 3.0.3 about Section 5.5, "Programs and Manuals," that carries over to TSTF-596.	NSPM did not adopt TSTF-545 into the PINGP TS, but proposes to add this paragraph to the PINGP TS Bases.
SR 3.4.10.1	Verify each pressurizer safety valve is operable.	STS SR 3.4.10.1	NSPM proposes not to specify lift settings for operability in TS as the lift settings are in the Bases.
TS 3.4.15	Reactor Coolant System (RCS) Pressure Isolation Valve (PIV) Leakage	STS 3.4.14	Numbering difference only.
SR 3.5.2.6	Emergency Core Cooling System (ECCS) – Operating	STS SR 3.5.2.4	Numbering difference only.
TS 3.6.3	Containment Isolation Valves	STS 3.6.3	Title difference only.
TS 3.6.5	Containment Spray and Cooling Systems	STS 3.6.6A/B/C	Numbering and title differences only.
TS 3.7.3 and Bases	Main Feedwater Regulation Valves (MFRVs) and MFRV Bypass Valves	STS 3.7.3	Title difference in TS. The STS 3.7.3 Bases includes a sentence explaining why the valves should not be tested at power that is not currently in the PINGP TS Bases. NSPM will be adding this sentence to the TS 3.7.3 Bases as shown in Attachment 2. This alignment with STS Bases is an administrative change.

PINGP TS	Short Title	TSTF-596/STS SR	Difference or Variation
TS 3.7.4 and SR 3.7.4.1	Steam Generator (SG) Power Operated Relief Valves (PORVs) Verify one complete cycle of each SG PORV	STS 3.7.4 Atmospheric Dump Valves (ADVs).	SG PORVs provide the method for cooling the unit to residual heat removal entry conditions if the condenser is not available, which differs from STS 3.7.4 that credits the atmospheric dump valves. PINGP SR 3.7.4.1 has Frequency of "In accordance with the Inservice Testing Program." NSPM proposes to change the Frequency to "In accordance with the Surveillance Frequency Control Program" to align with TSTF.
TS 3.7.11 and SR 3.7.11.2	Safeguards Chilled Water System (SCWS) Verify SCWS components operable	STS 3.7.11 Control Room Emergency Air Temperature Control System (CREATCS)	SCWS provides cooling capability for the control room. PINGP SR 3.7.11.2 has Frequency of, "In accordance with the Inservice Testing Program." NSPM proposes to change the Frequency to "In accordance with the Surveillance Frequency Control Program" to align with TSTF.
SR 3.8.1.5 And Bases	Verify fuel oil transfer system operation	STS SR 3.8.1.6	Numbering difference. While the PINGP TS Bases for SR 3.8.1.5 do not currently address the ASME Code as in the STS, NSPM proposes to follow the TSTF and add the reference to 10 CFR 50.55a(f) as shown in the markups of Attachment 2. This alignment with STS Bases is an administrative change.
TS 5.5.2	Primary Sources Outside Containment	STS 5.5.2	PINGP TS 5.5.2 uses the term, "as low as practical," whereas the STS use the term, "as low as practicable." NSPM proposes to change TS 5.5.2 to the STS wording as shown in the markups of Attachment 1. This is an administrative change.
TS 5.5.7	Inservice Testing (IST) Program	Not applicable. The Inservice Testing Program was deleted from STS 5.5 with TSTF-545.	NSPM did not adopt TSTF-545 into PINGP TS. As discussed in TSTF-596, the proposed change removes the TS Section 5.5, "Inservice Testing Program," in addition to making the other changes described in TSTF-596.

PINGP TS	Short Title	TSTF-596/STS SR	Difference or Variation
TS 5.5.9	Ventilation Filter Testing Program (VFTP)	STS 5.5.10	Numbering difference and wording differences discussed in Note 1.
TS 5.5.11	Diesel Fuel Oil Testing Program	STS 5.5.12	Numbering difference and the wording differences discussed in Note 2.
TS 5.5.16	Control Room Envelope Habitability Program	STS 5.5.17	Numbering difference and the wording differences discussed in Note 3. Also, editorial correction to insert a missing quotation mark.
TS 5.5.17	Surveillance Frequency Control Program	STS 5.5.19	Numbering difference and PINGP TS 5.5.17 includes provision c that notes the changes approved in Units 1 and 2 amendments 239 and 227 (ML22166A389), respectively, were not subject to TS 5.5.17, provision b, but that subsequent changes will be subject to the SFCP.

Notes:

1. PINGP TS include the following wording differences:
 - a. PINGP TS calls out specific systems – Control Room Special Ventilation System (CRSVS), Auxiliary Building Special Ventilation System (ABSVS), and Shield Building Ventilation System (SBVS). STS lists Engineered Safety Features (ESF) filter ventilation systems and flowrates.
 - b. PINGP TS calls out a frequency of, "...at least once each 24 months." STS calls out frequency of, "...at the frequencies specified in [Regulatory Guide] and in accordance with [Regulatory Guide 1.52, Revision 2, ASME N-510-1989 and AG-1]."
 - c. In Part a: PINGP TS specifies a DOP test. STS does not. PINGP TS calls out particle size. STS does not, but instead states testing in accordance with Regulatory Guide 1.52, Revision 2, and ASME N-510-1989.
 - d. In Part b: PINGP TS specifies halogenated hydrocarbon test of the inplace charcoal adsorber (SBVS not applicable).
 - e. In Part c: PINGP TS specifies methyl iodide penetration limits by ventilation system and specifies a single value for relative humidity.
 - f. In Part d: PINGP TS specifies a single pressure drop for applicable systems noting that SBVS not applicable to charcoal adsorbers.
2. PINGP TS include the following wording differences:
 - a. The PINGP TS 5.5.11 discussion specifies that sampling, testing, and acceptance criteria will be in accordance with ASTM D975-77 when checked for viscosity, water, and sediment. The STS 5.5.12 discussion does not specify the particular ASTM standard only noting that the applicable ASTM standard be used. The STS 5.5.12 discussion specifies acceptance of API gravity or absolute specific gravity, of flash

- point and kinematic viscosity, and clear bright appearance with proper color or water/sediment content within limits.
- b. The PINGP TS 5.5.11 discussion specifies testing of diesel fuel stored in safeguards storage tanks every 31 days with no further specifics. The STS 5.5.12 discussion specifies that:
 - i. Within 31 days following addition of the new fuel oil to storage tanks, verify that the properties of the new fuel oil, other than those addressed above, are within limits for ASTM 2D fuel oil, and
 - ii. Total particulate concentration of the fuel oil is ≤ 10 mg/l when tested every 31 days.
3. PINGP TS include the following wording differences:
- a. The PINGP TS 5.5.16 discussion uses PINGP-specific system name Control Room Special Ventilation System (CRSVS).
 - b. The PINGP TS 5.5.16 section d discussion specifies Licensee controlled programs that will be used to verify the integrity of the control room envelope (CRE) boundary. Conditions that generate relevant information from those programs will be entered into the corrective action process and shall be trended and used as part of the periodic assessments of the CRE boundary. The STS 5.5.17 section d discussion specifies Measurement, at designated locations, of the CRE pressure relative to all external areas adjacent to the CRE boundary during the pressurization mode of operation by one train of the CREFS, operating at the flow rate required by the VFTP, at a Frequency of [18] months on a STAGGERED TEST BASIS. The results shall be trended and used as part of the [18] month assessment of the CRE boundary.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Analysis

Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy (hereafter "NSPM"), requests adoption of TSTF-596, "Expand the Applicability of the Surveillance Frequency Control Program (SFCP)," which is an approved change to the Standard Technical Specifications (STS), into the Prairie Island Nuclear Generating Plant (PINGP) Units 1 and 2 Technical Specifications (TS). TSTF-596 expands the applicability of the SFCP to include other periodic testing frequencies in TS. The proposed change also revises the SFCP to reference additional regulatory mechanisms that may be used to control Surveillance Frequencies, such as 10 CFR 50.55a and 10 CFR 50.69. The proposed change revises Surveillance Requirements (SRs) that reference the Inservice Testing (IST) Program to instead reference the SFCP.

The proposed change also revises TS Table 3.3.1-1, Reactor Trip System Instrumentation, Function 6, Overtemperature ΔT , and Function 7, Overpower ΔT , Allowable Values to correct editorial errors with the pages referenced.

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

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

The proposed change relocates periodic Frequencies for SRs to licensee control under the SFCP. Surveillance Frequencies are not an initiator to any accident previously evaluated. As a result, the probability of any accident previously evaluated is not significantly increased. The systems and components required by the Technical Specifications for which the Surveillance Frequencies are relocated are still required to be operable, meet the acceptance criteria for the SRs, and be capable of performing any mitigative function assumed in the accident analysis. As a result, the consequences of any accident previously evaluated are not significantly increased.

The proposed change to Table 3.3.1-1 and the editorial change to TS 5.5.16 are purely administrative.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No

No new or different accidents result from utilizing the proposed change. The changes do not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. In addition, the changes do not impose any new or different requirements. The changes do not alter assumptions made in the safety analysis. The proposed changes are consistent with the safety analysis assumptions and current plant operating practice.

The proposed change to Table 3.3.1-1 and the editorial change to TS 5.5.16 are purely administrative.

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

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No

The proposed change is administrative in nature, does not negate any existing requirement, and does not adversely affect existing plant safety margins or the reliability of the equipment assumed to operate in the safety analysis. As such, there are no changes being made to safety analysis assumptions, safety limits or limiting safety system settings that would adversely affect plant safety as a result of the proposed change. Margins of safety are unaffected by relocation of the surveillance test intervals to a licensee controlled program.

The proposed change to Table 3.3.1-1 and the editorial change to TS 5.5.16 are purely administrative.

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

Based on the above, NSPM concludes that the proposed change presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

3.2 Conclusion

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

4.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed change qualifies for categorical exclusion from environmental review in accordance with 10 CFR 51.22. The proposed action to revise Table 3.3.1-1 is strictly an administrative change as described in 10 CFR 51.22(a)(1). The proposed action to adopt TSTF-596 is comprised of both:

- changes to surveillance, inspection, or testing requirements as described in 10 CFR 51.22(d)(1) and
- administrative changes as described in 10 CFR 51.22(a)(1).

The proposed action does not disturb any previously undisturbed ground and there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite, does not result in a significant increase in individual or cumulative public or occupational radiation exposure, and does not result in a significant increase in the potential for or consequences from radiological accidents. Therefore, pursuant to 10 CFR 51.22, neither an environmental assessment nor an environmental impact statement is required.

ENCLOSURE, ATTACHMENT 1

TECHNICAL SPECIFICATION PAGES (Markup)

(19 pages follow)

Table 3.3.1-1 (page 2 of 8)
Reactor Trip System Instrumentation

FUNCTION	APPLICABLE MODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS	CONDITIONS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
5. Source Range Neutron Flux	2(d)	2	H, I	SR 3.3.1.1 SR 3.3.1.8 SR 3.3.1.11 SR 3.3.1.16	≤ 1.0E6 cps
	3(a), 4(a), 5(a)	2	I, J	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.11 SR 3.3.1.16	≤ 1.0E6 cps
6. Overtemperature ΔT	1, 2	4	E	SR 3.3.1.1 SR 3.3.1.3 SR 3.3.1.6 SR 3.3.1.7 SR 3.3.1.12 SR 3.3.1.16	Refer to Note 1 (Page 3.3.1-23)
7. Overpower ΔT	1, 2	4	E	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.12 SR 3.3.1.16	Refer to Note 2 (Page 3.3.1-24)
8. Pressurizer Pressure					
a. Low	1(e)	4	K	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10	≥ 1845 psig
b. High	1, 2	3	E	SR 3.3.1.1 SR 3.3.1.7 SR 3.3.1.10	≤ 2400 psig

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- (a) With Rod Control System capable of rod withdrawal or one or more rods not fully inserted.
- (d) Below the P-6 (Intermediate Range Neutron Flux) interlocks.
- (e) Above the P-7 (Low Power Reactor Trips Block) interlock.

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. Required Action and associated Completion Time not met. <u>OR</u> Both pressurizer safety valves inoperable.	B.1 Be in MODE 3.	6 hours
	<u>AND</u> B.2 Be in MODE 4 with any RCS cold leg temperature \leq the OPPS enable temperature specified in the PTLR.	24 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.4.10.1 Verify each pressurizer safety valve is OPERABLE in accordance with the Inservice Testing Program . Following testing, lift settings shall be within $\pm 1\%$ (2460 to 2510 psig).	In accordance with the Inservice Testing Program

Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.4.15.1 -----NOTE----- Not required to be performed in MODES 3 and 4. -----</p> <p>Verify leakage from each RCS PIV is equivalent to ≤ 0.5 gpm per nominal inch of valve size up to a maximum of 5 gpm at an RCS pressure ≥ 2215 psig and ≤ 2255 psig.</p>	<p>In accordance with the Inservice Testing Program, and 24 months</p> <p>AND</p> <p>Prior to entering MODE 2 whenever the unit has been in MODE 5 for 7 days or more, if leakage testing has not been performed in the previous 9 months</p>


In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.5.2.2 -----NOTE----- Not required to be met for system vent flow paths opened under administrative control. -----</p> <p>Verify each ECCS manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.2.3 Verify power to the valve operator has been removed for each valve listed in SR 3.5.2.1.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.2.4 Verify ECCS accessible locations susceptible to gas accumulation are sufficiently filled with water.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.5.2.5 Verify ECCS inaccessible locations susceptible to gas accumulation are sufficiently filled with water.</p>	<p>Prior to entering MODE 3 after exiting shutdown cooling</p>
<p>SR 3.5.2.6 Verify each ECCS pump’s developed head at the test flow point is greater than or equal to the required developed head.</p>	<p>In accordance with the Inservice Testing Program</p>

Surveillance
Frequency Control
Program

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.6.3.5 Verify the isolation time of each automatic power operated containment isolation valve is within limits.	In accordance with the Inservice Testing Program
SR 3.6.3.6 Not Used	<div style="border: 1px solid red; padding: 2px; display: inline-block;">Surveillance Frequency Control Program</div> 
SR 3.6.3.7 Verify each automatic containment isolation valve that is not locked, sealed or otherwise secured in position, actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.6.3.8 Verify the combined leakage rate for all secondary containment bypass leakage paths is in accordance with the Containment Leakage Rate Testing Program.	In accordance with the Containment Leakage Rate Testing Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.6.5.1 -----NOTE----- Not required to be met for system vent flow paths opened under administrative control. ----- Verify each containment spray manual, power operated, and automatic valve in the flow path that is not locked, sealed, or otherwise secured in position is in the correct position.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.6.5.2 Operate each containment fan coil unit on low motor speed for ≥ 15 minutes.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.6.5.3 Verify containment spray locations susceptible to gas accumulation are sufficiently filled with water.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.6.5.4 Verify cooling water flow rate to each containment fan coil unit is ≥ 900 gpm.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.6.5.5 Verify each containment spray pump's developed head at the flow test point is greater than or equal to the required developed head.</p>	<p>In accordance with the Inservice Testing Program</p>

Surveillance
Frequency Control
Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.1.1 -----NOTE----- Only required to be performed in MODES 1 and 2. ----- Verify each MSSV lift setpoint per Table 3.7.1-1 in accordance with the Inservice Testing Program. Following testing, lift setting shall be within $\pm 1\%$.</p>	<p>In accordance with the Inservice Testing Program</p>

Surveillance
Frequency Control
Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
<p>C. -----NOTE----- Separate Condition entry is allowed for each MSIV. -----</p> <p>One or more MSIVs inoperable in MODE 2 or 3.</p>	<p>C.1 Close MSIV. <u>AND</u> C.2 Verify MSIV is closed.</p>	<p>8 hours Once per 7 days</p>
<p>D. Required Action and associated Completion Time of Condition C not met.</p>	<p>D.1 Be in MODE 3. <u>AND</u> D.2 Be in MODE 4.</p>	<p>6 hours 12 hours</p>

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.2.1 -----NOTE----- Only required to be performed in MODES 1 and 2. -----</p> <p>Verify the isolation time of each MSIV is within limits.</p>	<p>In accordance with the Inservice Testing Program</p>

Surveillance Frequency Control Program

ACTIONS (continued)

CONDITION	REQUIRED ACTION	COMPLETION TIME
B. One or both MFRV bypass valves inoperable.	B.1 Close and place in manual or isolate flow through bypass valve(s).	72 hours
	<u>AND</u> B.2 Verify bypass valve(s) closed and in manual or flow through valve(s) isolated.	Once per 7 days
C. Required Action and associated Completion Time not met.	C.1 Be in MODE 3.	6 hours
	<u>AND</u> C.2 Be in MODE 4.	12 hours

Surveillance
Frequency Control
Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.3.1 Verify the isolation time of each MFRV and MFRV bypass valve is within limits.	In accordance with the Inservice Testing Program
SR 3.7.3.2 Verify each MFRV and MFRV bypass valve actuates to the isolation position on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS


SURVEILLANCE	FREQUENCY
SR 3.7.4.1 Verify one complete cycle of each SG PORV. <div data-bbox="673 436 958 556" style="border: 1px solid red; padding: 2px; display: inline-block; margin-left: 200px;"> Surveillance Frequency Control Program </div>	In accordance with the Inservice Testing Program
SR 3.7.4.2 Verify one complete manual cycle of each SG PORV block valve.	In accordance with the Surveillance Frequency Control Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
<p>SR 3.7.5.1 -----NOTE----- AFW train(s) may be considered OPERABLE during alignment and operation for steam generator level control if it is capable of being manually realigned to the AFW mode of operation.</p> <p>-----</p> <p>Verify each AFW manual, power operated, and automatic valve in each water flow path, and in both steam supply flow paths to the steam turbine driven pump, that is not locked, sealed, or otherwise secured in position, is in the correct position.</p>	<p>In accordance with the Surveillance Frequency Control Program</p>
<p>SR 3.7.5.2 -----NOTE----- Not required to be performed for the turbine driven AFW pump until prior to exceeding 10% RTP or within 72 hours after RCS temperature > 350°F.</p> <p>-----</p> <p>Verify the developed head of each AFW pump at the flow test point is greater than or equal to the required developed head.</p>	<p>In accordance with the Inservice Testing Program</p>

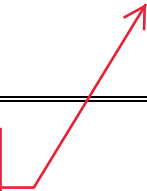
Surveillance
Frequency Control
Program

SURVEILLANCE REQUIREMENTS

SURVEILLANCE	FREQUENCY
SR 3.7.11.1 Verify each SCWS loop actuates on an actual or simulated actuation signal.	In accordance with the Surveillance Frequency Control Program
SR 3.7.11.2 Verify SCWS components OPERABLE in accordance with the Inservice Testing Program. 	In accordance with the Inservice Testing Program



Surveillance
Frequency Control
Program



5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

- c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Report for the period of the report in which any change in the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed. The date (i.e., month and year) the change was implemented shall be indicated.

5.5.2 Primary Coolant Sources Outside Containment

practicable

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as ~~practical~~. The systems include portions of the Residual Heat Removal and Safety Injection Systems. The program shall include the following:

- a. Preventive maintenance and periodic visual inspection requirements; and
- b. Integrated leak test requirements for each system at ~~least once per 24 months~~.

The provisions of SR 3.0.2 are applicable.

a Frequency in accordance with the Surveillance Frequency Control Program

5.5.3 Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant, radioactive gases, and particulates in plant gaseous effluents and containment atmosphere samples under accident conditions. The program shall include the following:

- a. Training of personnel;
- b. Procedures for sampling and analysis; and

5.5 Programs and Manual (continued)

Not Used.

5.5.7 ~~Inservice Testing Program~~

~~This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components. The program shall include the following:~~

- ~~a. Testing frequencies applicable to the ASME Code for Operations and Maintenance of Nuclear Power Plants (ASME OM Code) and applicable Addenda as follows:~~

ASME OM Code and applicable Addenda terminology for inservice testing activities	Required Frequencies for performing inservice testing activities
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Semiquarterly	At least once per 46 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

- ~~b. The provisions of SR 3.0.2 are applicable to the above required Frequencies and to other normal and accelerated Frequencies specified 2 years or less in the Inservice Testing Program for performing inservice testing activities.~~
- ~~e. The provisions of SR 3.0.3 are applicable to inservice testing activities; and~~
- ~~d. Nothing in the ASME OM Code shall be construed to supersede the requirements of any TS.~~

5.5 Programs and Manuals (continued)

5.5.9 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of the Control Room Special Ventilation System (CRSVS), Auxiliary Building Special Ventilation System (ABSVS), and Shield Building Ventilation System (SBVS) at ~~least once each 24 months~~.

Demonstrate for the ABSVS, SBVS, and CRSVS systems that:

- a. An in-place DOP test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass $< 0.05\%$ (for DOP, particles having a mean diameter of 0.7 microns);
- b. A halogenated hydrocarbon test of the in-place charcoal adsorber shows a penetration and system bypass $< 0.05\%$ (SBVS not applicable);
- c. A laboratory test of a sample of the charcoal adsorber, when obtained as described in Regulatory Guide 1.52, Revision 2, shows the methyl iodide penetration less than: 1) 10% penetration for ABSVS, and 2) 2.5% penetration for the CRSVS when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and 95% relative humidity (RH);
- d. The pressure drop across the combined HEPA filters and the charcoal adsorbers (SBVS not applicable to charcoal adsorbers) is less than 6 inches of water at the system flowrate $\pm 10\%$; and
- e. A laboratory test of a sample of the charcoal adsorber shall have filter test face velocities greater than or equal to the following values for each system: 1) 54 fpm for the CRSVS, and 2) 72 fpm for the ABSVS.

the periodic Frequencies in accordance with the Surveillance Frequency Control Program.

5.5 Programs and Manuals (continued)

5.5.11 Diesel Fuel Oil Testing Program

a Frequency in accordance with the Surveillance Frequency Control Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all in accordance with the limits specified in Table 1 of ASTM D975-77 when checked for viscosity, water, and sediment. Acceptability of new fuel oil shall be determined prior to addition to the safeguards storage tanks. Testing of diesel fuel oil stored in the safeguards storage tanks shall be performed at ~~least every 31 days~~.

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Diesel Fuel Oil Testing Program test Frequencies.

5.5.12 Technical Specifications (TS) Bases Control Program

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

- a. Changes to the Bases of the TS shall be made under appropriate administrative controls and reviews;
- b. Licensees may make changes to Bases without prior NRC approval provided the changes do not require either of the following:
 1. a change in the TS incorporated in the license, or
 2. a change to the USAR or Bases that requires NRC approval pursuant to 10 CFR 50.59;
- c. The Bases Control Program shall contain provisions to ensure that the Bases are maintained consistent with the USAR; and

5.5 Programs and Manuals (continued)

5.5.16 Control Room Envelope Habitability Program

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

at the periodic
Frequencies in
accordance with the
Surveillance Frequency
Control Program and

- a. The definition of the CRE and the CRE boundary.
- b. Requirements for maintaining the CRE boundary in its design conditions including configuration control and preventive maintenance.
- c. Requirements for (i) determining the unfiltered air in-leakage past the CRE boundary into the CRE in accordance with the testing methods and at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, "Demonstrating Control Room Envelope Integrity at Nuclear Power Reactors," Revision 0, May 2003, and (ii) assessing CRE habitability at the Frequencies specified in Sections C.1 and C.2 of Regulatory Guide 1.197, Revision 0.
- d. Licensee controlled programs that will be used to verify the integrity of the CRE boundary. Conditions that generate relevant information from those programs will be entered into the corrective action process and shall be trended and used as part of the periodic assessments of the CRE boundary.

event-driven
frequencies

"

5.5 Programs and Manuals

5.5.16 Control Room Envelope Habitability Program (continued)

- e. The quantitative limits on unfiltered air in-leakage into the CRE. These limits shall be stated in a manner to allow direct comparison to the unfiltered in-leakage measured by the testing described in paragraph c. The unfiltered air in-leakage limit for radiological challenges is the in-leakage flow rate assumed in the licensing basis analysis of DBA consequences. Unfiltered air inleakage limits for hazardous chemicals must ensure that exposure of CRE occupants to these hazards will be within the assumptions of the licensing basis.
- f. The provisions of SR 3.0.2 are applicable to the Frequencies for assessing CRE habitability and determining CRE unfiltered in-leakage as required by paragraph c.

and the frequencies of other periodic testing required by these Technical Specifications (herein also referred to as Surveillance Frequencies)

5.5.17 Surveillance Frequency Control Program

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

and other required testing

- a. The Surveillance Frequency Control Program shall contain a list of Frequencies of those Surveillance Requirements for which the Frequency is controlled by the program.
- b. Changes to the Frequencies listed in the Surveillance Frequency Control Program shall be made in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.
- c. The 24-Month Fuel Cycle related Surveillance Requirement Frequency changes approved by the NRC in Units 1 and 2 License Amendments 239/227 were not subject to provision b. Subsequent changes are subject to the Surveillance Frequency Control Program.

and other requirements

these

:
1. In accordance with the requirements of 10 CFR 50.55a for testing required by 10 CFR 50.55a(f);
2. In accordance with the requirements of 10 CFR 50.69(d)(2) for testing permitted under 10 CFR 50.69(b)(1)(v) in lieu of testing required by 10 CFR 50.55a(f);
3. Otherwise, in accordance with NEI 04-10, "Risk-Informed Method for Control of Surveillance Frequencies," Revision 1.

5.5 Programs and Manuals

5.5.17 Surveillance Frequency Control Program (continued)

- d. The provisions of Surveillance Requirements 3.0.2 and 3.0.3 are applicable to the Frequencies established in the Surveillance Frequency Control Program.

← except:
1. For testing required by 10 CFR 50.55a(f), Surveillance Requirement 3.0.2 is only applicable as permitted by that regulation; and
2. Surveillance Requirement 3.0.3 is only applicable to other required testing when invoked by a Chapter 5 Specification.

5.5.18 Risk Informed Completion Time

This program provides contrast to the Required Action Completion Time (RACT) and must be implemented in accordance with NEI 06-09-A, Revision 0, "Risk-Managed Technical Specifications (RMTS) Guidelines." The program shall include the following:

- a. The RICT may not exceed 30 days;
- b. A RICT may only be utilized in MODES 1 and 2;
- c. When a RICT is being used, any change to the plant configuration, as defined in NEI 06-09-A, Appendix A, must be considered for the effect on the RICT.
1. For planned changes, the revised RICT must be determined prior to implementation of the change in configuration.
 2. For emergent conditions, the revised RICT must be determined within the time limits of the Required Action Completion Time (i.e., not the RICT) or 12 hours after the plant configuration change, whichever is less.
 3. Revising the RICT is not required if the plant configuration change would lower plant risk and would result in a longer RICT.
- d. For emergent conditions, if the extent of condition evaluation for inoperable structures, systems, or components (SSCs) is not complete prior to exceeding the Completion Time, the RICT shall account for the increased possibility of common cause failure (CCF) by either:

ENCLOSURE, ATTACHMENT 2

**TECHNICAL SPECIFICATION BASES PAGES (Marked Up)
(Provided for Information Only)**

(29 pages follow)

B 3.0 SURVEILLANCE REQUIREMENT (SR) APPLICABILITY

BASES

SRs SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications and apply at all times, unless otherwise stated.

SR 3.0.1

SR 3.0.1 establishes the requirement that SRs must be met during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply, unless otherwise specified in the individual SRs. This Specification is to ensure that Surveillances are performed to verify the OPERABILITY of systems and components, and that variables are within specified limits. Failure to meet a Surveillance within the specified Frequency, in accordance with SR 3.0.2, constitutes a failure to meet an LCO. Surveillances may be performed by means of any series of sequential, overlapping, or total steps provided the entire Surveillance is performed within the specified Frequency. Additionally, the definitions related to instrument testing (e.g. , CHANNEL CALIBRATION) specify that these tests are performed by means of any series of sequential, overlapping, or total steps.

SR 3.0.2 and SR 3.0.3 apply in Chapter 5 only when invoked by a Chapter 5 Specification.

Systems and components are assumed to be OPERABLE when the associated SRs have been met. Nothing in this Specification, however, is to be construed as implying that systems or components are OPERABLE when:

- a. The systems or components are known to be inoperable, although still meeting the SRs; or
- b. The requirements of the Surveillance(s) are known not to be met between required Surveillance performances.

Surveillances do not have to be performed when the unit is in a MODE or other specified condition for which the requirements of the associated LCO are not applicable, unless otherwise specified. The SRs associated with a test exception are only applicable when the Test Exception LCO is used as an allowable exception to the

BASES

SR 3.0.2
(continued)

ongoing Surveillance or maintenance activities). ~~As noted in NRC Enforcement Guidance Memorandum 12-001 (Reference 1), the 25% interval extension allowed by SR 3.0.2 applies to TS Section 5.5 Programs which invoke SR 3.0.2.~~

These programs

When a Section 5.5, "Programs and Manuals," specification states that the provisions of SR 3.0.2 are applicable, a 25% extension of the testing interval, whether stated in the specification or incorporated by reference, is permitted.

Examples

are

required by 10 CFR 50.55a, Appendix J, and the inservice testing of pumps and valves in accordance with the requirements of 10 CFR 50.55a(f).

The 25% extension does not significantly degrade the reliability that results from performing the Surveillance at its specified Frequency. This is based on the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the SRs. The exceptions to SR 3.0.2 are those Surveillances for which the 25% extension of the interval specified in the Frequency does not apply. These exceptions are stated in the individual Specifications. The requirements of regulations take precedence over the TS. An example of where SR 3.0.2 does not apply is in the Containment Leakage Rate Testing Program. This program establishes testing requirements and Frequencies in accordance with the requirements of regulations. The TS cannot in and of themselves extend a test interval specified in the regulations.

As stated in SR 3.0.2, the 25% extension also does not apply to the initial portion of a periodic Completion Time that requires performance on a "once per" basis. The 25% extension applies to each performance after the initial performance. The initial performance of the Required Action, whether it is a particular Surveillance or some other remedial action, is considered a single action with a single Completion Time. One reason for not allowing the 25% extension to this Completion Time is that such an action usually verifies that no loss of function has occurred by checking the status of redundant or diverse components or accomplishes the function of the inoperable equipment in an alternative manner.

The provisions of SR 3.0.2 are not intended to be used repeatedly to extend Surveillance intervals (other than those consistent with refueling intervals) or periodic Completion Time intervals beyond those specified.

directly or by reference.

BASES (continued)

SR 3.0.3

SR 3.0.3 establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been performed within the specified Frequency. A delay period of up to 24 hours or up to the limit of the specified Frequency, whichever is greater, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met. ~~SR 3.0.3 does not apply to TS 5.5.7, "Inservice Testing Program", tests unless the tests are required by TS Chapter 3 SRs since SR 3.0.3 does not apply to 10CFR 50.55a(f) tests (References 1 through 4). Missed TS 5.5.7 tests not required by a TS Chapter 3 SR should be addressed in the Corrective Action Program (CAP) as a nonconformance to ASME OM requirements.~~

↑ This delay period provides adequate time to perform Surveillances that have been missed. This delay period permits the performance of a Surveillance before complying with Required Actions or other remedial measures that might preclude performance of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements. When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions, operating situations, or requirements of regulations (e.g., prior to entering MODE 1 after each fuel loading, or in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, etc.) is discovered to

When a Section 5.5, "Programs and Manuals," specification states that the provisions of SR 3.0.3 are applicable, it permits the flexibility to defer declaring the testing requirement not met in accordance with SR 3.0.3 when the testing has not been completed within the testing interval (including the allowance of SR 3.0.2 if invoked by the Section 5.5 specification).

BASES

ACTIONS

B.1 and B.2 (continued)

and without challenging plant systems. With any RCS cold leg temperatures at or below the OPPS enable temperature specified in the PTLR, overpressure protection is provided by the LTOP function. The change from MODE 1, 2, or 3 to MODE 4 reduces the RCS energy (core power and pressure), lowers the potential for large pressurizer insurges, and thereby removes the need for overpressure protection by both pressurizer safety valves.

SURVEILLANCE
REQUIREMENTS

SR 3.4.10.1

~~SRs are specified in the Inservice Testing Program.~~ Pressurizer safety valves are ~~to be~~ tested in accordance with the requirements of the ~~ASME Code~~ (Ref. 4), ~~which provides the activities and frequencies necessary to satisfy the SRs.~~ No additional requirements are specified.

10 CFR 50.55a(f)



The pressurizer safety valve setpoint is $\pm 3\%$ for OPERABILITY; however, the valves are reset to $\pm 1\%$ during the Surveillance to allow for drift.

REFERENCES

1. ASME, Boiler and Pressure Vessel Code, Section III, with the 1968 Winter Addendum.
2. USAR, Section 14.
3. WCAP-7769, Rev. 1, June 1972.
4. ~~ASME Code for Operation and Maintenance of Nuclear Power Plants.~~

10 CFR 50.55a(f)



The Surveillance Frequency is controlled under the Surveillance Frequency Control Program in accordance with the requirements of 10 CFR 50.55a(f).

BASES

ACTIONS
(continued)

G.1 and G.2

If the Required Actions of Condition F are not met, then the plant must be brought to a MODE in which the LCO does not apply. To achieve this status, the plant must be brought to at least MODE 3 within 6 hours and to MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required plant conditions from full power conditions in an orderly manner and without challenging plant systems. In MODES 4 and 5, automatic PORV OPERABILITY may be required. See LCO 3.4.12 and LCO 3.4.13.

SURVEILLANCE
REQUIREMENTS

SR 3.4.11.1

Block valve cycling verifies that the valve(s) can be opened and closed if needed.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

in accordance with
the requirements of
10 CFR 50.55a(f)
(Ref. 2)

This SR is modified by two Notes. Note 1 modifies this SR by stating that it is not required to be performed with the block valve closed in accordance with the Required Action of Condition B or E. Opening the block valve in this condition increases the risk of an unisolable leak from the RCS since the PORV is already inoperable.

Note 2 modifies this SR to allow entry into and operation in MODE 3 prior to performing the SR. This allows the test to be performed in MODE 3 under operating temperature and pressure conditions, prior to entering MODE 1 or 2.

SR 3.4.11.2

SR 3.4.11.2 requires a complete cycle of each PORV. Operating a PORV through one complete cycle ensures that the PORV can be

BASES

SURVEILLANCE REQUIREMENTS SR 3.4.11.2 (continued)

manually actuated for mitigation of an SGTR.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

The Note modifies this SR to allow entry into and operation in MODE 3 prior to performing the SR. This allows the test to be performed in MODE 3 under operating temperature and pressure conditions prior to entering MODE 1 or 2.

REFERENCES 1. USAR, Section 14.

2. 10 CFR 50.55a(f).

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.4.15.1 (continued)

to 5 gpm maximum applies to each valve. Leakage testing requires a stable pressure condition of at least 150 psid.

For the two PIVs in series, the leakage requirement applies to each valve individually and not to the combined leakage across both valves. If the PIVs are not individually leakage tested, one valve may have failed completely and not be detected if the other valve in series meets the leakage requirement. In this situation, the protection provided by redundant valves would be lost.

Testing is to be performed at the following times:

- a. Every 24 months, a typical refueling cycle;
- b. Prior to entering MODE 2 whenever the unit has been in MODE 5 for 7 days or more, if leakage testing has not been performed in the previous 9 months.

~~The 24 month Frequency is consistent with 10 CFR 50.55a(g) as contained in the Inservice Testing Program, is within the frequency allowed by Reference 4, and is based on the need to perform such surveillances under the conditions that apply during an outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. To satisfy ALARA requirements, leakage may be measured indirectly (as from the performance of pressure indicators) if accomplished in accordance with approved procedures and supported by computations showing that the method is capable of demonstrating valve compliance with the leakage criteria.~~

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program in accordance with the requirements of 10 CFR 50.55a(f) (Ref. 4).

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.4.15.1 (continued)

The leakage limit is to be met at the RCS pressure associated with MODES 1 and 2. This permits leakage testing at high differential pressures with stable conditions not possible in the MODES with lower pressures. A differential pressure of at least 150 psid is sufficient to ensure the valves are seated.

Entry into MODES 3 and 4 is allowed to establish the necessary differential pressures and stable conditions to allow for performance of this Surveillance. The Note that allows this provision is complementary to the Frequency of prior to entry into MODE 2 whenever the unit has been in MODE 5 for 7 days or more, if leakage testing has not been performed in the previous 9 months. PIVs contained in the RHR shutdown cooling flow path must be leakage rate tested after RHR is secured and stable unit conditions and the necessary differential pressures are established.

REFERENCES

1. WASH-1400 (NUREG-75/014), Appendix V, October 1975.
2. NUREG-0677, May 1980.
3. Letter from Robert A. Clark, NRC, to L. O. Mayer, NSP, Subject: "Order for Modification of License Concerning Primary Coolant System Pressure Isolation Valves," dated April 20, 1981.
4. ~~American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants.~~

10 CFR 50.55a(f).

BASES

SURVEILLANCE SR 3.5.2.4 and SR 3.5.2.5 (continued)
REQUIREMENTS

inaccessible due to radiological or environmental conditions, the plant configuration, or personnel safety. For these locations alternative methods (e.g., operating parameters, remote monitoring) may be used to monitor the susceptible location. Monitoring is not required for susceptible locations where the maximum potential accumulated gas void volume has been evaluated and determined to not challenge system OPERABILITY. The accuracy of the method used for monitoring the susceptible locations and trending of the results should be sufficient to assure system OPERABILITY during the Surveillance interval.

The event-based Frequency for inaccessible locations take into consideration the gradual nature of gas accumulation in the ECCS piping and the procedural controls governing system operation. Additionally, the Frequency for inaccessible locations allows this Surveillance to be performed under plant conditions that enable direct monitoring. The Frequency for accessible locations is in accordance with the Surveillance Frequency Control Program.

The as-found conditions of the inaccessible locations are monitored at the earliest possible shutdown condition according to the Gas Accumulation Management Program. In a rapid shutdown, there may be insufficient time to verify the as-found condition of the inaccessible locations prior to RCS depressurization.

performed in accordance with the requirements of 10 CFR 50.55a(f) (Ref. 6).

SR 3.5.2.6

Periodic surveillance testing of ECCS pumps to detect gross degradation caused by impeller structural damage or other hydraulic component problems is ~~required by the ASME Code~~. This type of testing may be accomplished by measuring the pump developed head at a single point of the pump characteristic curve. This verifies both that the measured performance is within an acceptable tolerance of the original pump baseline performance and that the performance at the test flow is within the performance assumed in the plant safety

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.5.2.6 (continued)

analysis. ~~SRs are specified in the Inservice Testing Program of the ASME Code. The ASME Code provides the activities and Frequencies necessary to satisfy the requirements.~~

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program in accordance with the requirements of 10 CFR 50.55a(f).

SR 3.5.2.7 and SR 3.5.2.8

These Surveillances demonstrate that each automatic ECCS valve actuates to the required position on an actual or simulated SI signal and that each ECCS pump starts on receipt of an actual or simulated SI signal. This test is met when control board indications and visual observations indicate that all components have received the safety injection signal in the proper sequence and timing, the appropriate pump breakers have opened and closed, and all automatic valves have been placed in the proper position required to establish a safety injection flow path to the reactor coolant system.

This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls.

The Surveillance Frequencies are controlled under the Surveillance Frequency Control Program.

SR 3.5.2.9

Surveillance Requirements on ECCS throttle valves provide assurance that proper ECCS flows are maintained in the event of a LOCA. Proper flow resistance and pressure drop in the piping system to each injection point in the SI System is necessary to:

- 1) prevent total pump flow from exceeding runout conditions when the system is in its minimum resistance configuration;

BASES

SURVEILLANCE SR 3.5.2.9 (continued)
REQUIREMENTS

2) provide the proper flow split between injection points in accordance with the assumptions used in the ECCS LOCA analyses; and 3) provide an acceptable level of total ECCS flow to all injection points equal to or above that assumed in the ECCS LOCA analyses.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.5.2.10

Periodic inspections of the containment sump suction inlet to the RHR System ensure that it is unrestricted and stays in proper operating condition.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

REFERENCES

1. Criterion 44 of:
Atomic Energy Commission Proposed Rule Making, Part 50 - Licensing of Production and Utilization Facilities; General Design Criteria for Nuclear Power Plant Construction Permits, Federal Register 32, No. 132 (July 11, 1967): 10213. [NRC Accession Number: ML043310029]
2. USAR, Section 6.2.
3. USAR, Section 14.
4. NRC Memorandum to V. Stello, Jr., from R.L. Baer, "Recommended Interim Revisions to LCOs for ECCS Components," December 1, 1975.
5. IE Information Notice No. 87-01.

 6. 10 CFR 50.55a(f).

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.6.3.5

Verifying that the isolation time of each automatic power operated containment isolation valve is within limits is required to demonstrate OPERABILITY. The isolation time test ensures the valve will isolate in a time period less than or equal to that assumed in the safety analyses. ~~The isolation time and Frequency of this SR are in accordance with the Inservice Testing Program.~~

SR 3.6.3.6

Not used.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program in accordance with the requirements of 10 CFR 50.55a(f) (Ref. 5).

SR 3.6.3.7

Automatic containment isolation valves close on a containment isolation signal to prevent leakage of radioactive material from containment following a DBA. This SR ensures that each automatic containment isolation valve will actuate to its isolation position on a containment isolation signal. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.6.3.8

This SR ensures that the combined leakage rate of all secondary containment (shield building and auxiliary building special ventilation zone) bypass leakage paths is less than or equal to the specified leakage rate. This provides assurance that the assumptions in the safety analysis are met. The leakage rate of each bypass leakage path is assumed to be the maximum pathway leakage (leakage through the worse of the two isolation valves) unless the penetration is isolated by use of one closed and de-activated automatic valve, closed manual valve, or blind flange. In this case, the leakage rate of the isolated bypass leakage path is assumed to be the actual pathway leakage through the isolation device. If both isolation valves in the penetration are closed, the actual leakage rate is the lesser leakage rate of the two valves. The acceptance criteria and Frequency are provided by the Containment Leakage Rate Testing Program.

Bypass leakage is considered part of L_a .

REFERENCES

1. 10 CFR 50, Appendix A.
2. USAR, Section 5.2.
3. USAR, Section 14.
4. Criterion 53 of:
Atomic Energy Commission Proposed Rule Making, Part 50 -
Licensing of Production and Utilization Facilities; General
Design Criteria for Nuclear Power Plant Construction Permits,
Federal Register 32, No. 132 (July 11, 1967): 10213. [NRC
Accession Number: ML043310029]

5. 10 CFR 50.55a(f).

BASES

SURVEILLANCE SR 3.6.5.5
REQUIREMENTS

(continued)

Verifying each containment spray pump's developed head at the flow test point is greater than or equal to the required developed head ensures that spray pump performance has not degraded. Flow and differential pressure are normal tests of centrifugal pump performance ~~required by the ASME Code (Ref. 6)~~. Since the containment spray pumps cannot be tested with flow through the spray headers, they are tested on recirculation flow. This test confirms one point on the pump design curve and is indicative of overall performance. Such ~~inservice~~ tests confirm component OPERABILITY, trend performance, and detect incipient failures by abnormal performance. ~~The Frequency of the SR is in accordance with the Inservice Testing Program.~~

in accordance with the requirements of 10 CFR 50.55a(f) (Ref. 6).

SR 3.6.5.6 and SR 3.6.5.7

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program in accordance with the requirements of 10 CFR 50.55a(f).

These SRs require verification that each automatic containment spray valve actuates to its correct position and that each containment spray pump starts upon receipt of an actual or simulated actuation of a containment High-High pressure signal. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under administrative controls. To prevent inadvertent spray in containment, containment spray pump testing with a simulated actuation signal will be performed with the isolation valves in the spray supply lines at the containment and the spray additive tank isolation valves blocked closed. These tests will be considered satisfactory if visual observations indicate all components have operated satisfactorily.

The Surveillance Frequencies are controlled under the Surveillance Frequency Control Program.

BASES (continued)

- REFERENCES
1. Criteria 37, 38, 41, 42, 49, 52, and 58 through 61 of: Atomic Energy Commission Proposed Rule Making, Part 50 - Licensing of Production and Utilization Facilities; General Design Criteria for Nuclear Power Plant Construction Permits, Federal Register 32, No. 132 (July 11, 1967): 10213. [NRC Accession Number: ML043310029]
 2. USAR Section 6.4.
 3. USAR, Section 14.5.
 4. USAR, Section 6.3.
 5. USAR, Section 5.2.
 6. ~~American Society of Mechanical Engineers (ASME) Code for Operation and Maintenance of Nuclear Power Plants.~~

10 CFR 50.55a(f).

BASES

APPLICABLE
SAFETY
ANALYSES
(continued)

By relieving steam, the MSSVs prevent RCS overpressurization. The limiting events, described in the USAR (Ref. 3), that challenge the relieving capacity of the MSSVs, and thus RCS pressure, are those characterized as decreased heat removal events, such as the full power turbine trip without steam dump, and increasing core heat flux events, such as the rod cluster control assembly (RCCA) withdrawal at power.

The safety analyses demonstrate that the transient response for turbine trip occurring from full power without a direct reactor trip presents no hazard to the integrity of the RCS or the Main Steam System. If a minimum (least negative or most positive) reactivity feedback is assumed, the reactor is tripped on high pressurizer pressure. In this case, the pressurizer safety valves open, and RCS pressure remains below 110% of the design value. The MSSVs also open to limit the secondary steam pressure.

The transient response for the slow and fast RCCA withdrawal at power events also present no hazard to the integrity of the RCS or the Main Steam System. Diverse reactor trip inputs from nuclear instrumentation and pressurizer level and pressure are assumed to shut down the reactor when the associated trip setpoint is reached. In this analysis, the pressurizer safety valves open and RCS pressure remains below 110% of the design value. The MSSVs also open to limit the secondary steam pressure.

The MSSVs satisfy Criterion 3 of 10 CFR 50.36(c)(2)(ii).

LCO

The LCO requires that five MSSVs per steam generator be OPERABLE in compliance with Reference 2. The OPERABILITY of the MSSVs is defined as the ability to open upon demand within the setpoint tolerances, relieve steam generator overpressure, and close when pressure has been reduced. The OPERABILITY of the MSSVs is determined by periodic surveillance testing in accordance with the ~~Inservice Testing Program.~~

requirements of 10 CFR 50.55a(f) (Ref. 4).

BASES

ACTIONS

B.1 and B.2 (continued)

12 hours.

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

SURVEILLANCE
REQUIREMENTS

SR 3.7.1.1

requirements of 10 CFR
50.55a(f) (Ref. 4).

This SR verifies the OPERABILITY of the MSSVs by the verification of each MSSV lift setpoint in accordance with the ~~Inservice Testing Program~~. The ASME Code (Ref. 4), ~~requires that safety and relief valve tests be performed in accordance with Reference 5. According to Reference 5, the following tests are required:~~

- ~~a. Visual examination;~~
- ~~b. Seat tightness determination;~~
- ~~c. Setpoint pressure determination (lift setting); and~~
- ~~d. Compliance with owner's seat tightness criteria.~~

~~The ANSI/ASME Standard requires that all valves be tested every 5 years, and a minimum of 20% of the valves be tested every 24 months. The ASME Code specifies the activities and frequencies necessary to satisfy the requirements. Table 3.7.1-1 allows a ± 3% setpoint tolerance for OPERABILITY; however, the valves are reset to within a nominal ± 1% of their setpoint during the Surveillance. The lift settings, according to Table 3.7.1-1, correspond to ambient conditions of the valve at nominal operating temperature and pressure.~~

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program in accordance with the requirements of 10 CFR 50.55a(f) (Ref. 4).

BASES

SURVEILLANCE
REQUIREMENTS SR 3.7.1.1 (continued)

This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. The MSSVs may be either bench tested or tested in situ at hot conditions using an assist device to simulate lift pressure. If the MSSVs are not tested at hot conditions, the lift setting pressure shall be corrected to ambient conditions of the valve at operating temperature and pressure.

REFERENCES

1. USAR, Section 11.4.
2. ASME, Boiler and Pressure Vessel Code, Section III, Article NC-7000, Class 2 Components.
3. USAR, Section 14.4.
4. ~~ASME Code for Operation and Maintenance of Nuclear Power Plants.~~
5. ~~ASME OM Code, Appendix I, Inservice Testing of Pressure Relief Devices in Light Water Reactor Power Plants.~~

10 CFR 50.55a(f).



BASES

ACTIONS
(continued)

D.1 and D.2

If the MSIVs cannot be restored to OPERABLE status or are not closed within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed at least in MODE 3 within 6 hours, and in MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from MODE 2 conditions in an orderly manner and without challenging unit systems.

SURVEILLANCE
REQUIREMENTS

SR 3.7.2.1

This SR verifies that the closure time of each MSIV is within the limit given in Reference 5 and is within that assumed in the accident and containment analyses. This SR also verifies the valve closure time is in accordance with the ~~Inservice Testing Program~~. This SR is normally performed upon returning the unit to operation following a refueling outage. The MSIVs should not be tested at power, since even a part stroke exercise increases the risk of valve closure when the unit is generating power. As the MSIVs are not tested at power, they are ~~deferred from the ASME Code (Ref. 6) requirements~~ during operation in MODE 1 or 2.

requirements of 10 CFR 50.55a(f) (Ref. 6).

exempt from the 10 CFR 50.55a(f)

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program in accordance with the requirements of 10 CFR 50.55a(f) (Ref. 6).

~~The Frequency is in accordance with the Inservice Testing Program.~~

This test is conducted in MODE 3 with the unit at operating temperature and pressure. This SR is modified by a Note that allows entry into and operation in MODE 3 prior to performing the SR. This allows a delay of testing until MODE 3, to establish conditions consistent with those under which the acceptance criterion was generated.

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.7.2.2

This SR verifies each MSIV can close on an actual or simulated main steam isolation signal. This Surveillance is normally performed upon returning the plant to operation following a refueling outage.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

REFERENCES

1. USAR, Section 11.7.
 2. USAR, Section 14.5.
 3. Not used.
 4. 10 CFR 100.11.
 5. Technical Requirements Manual.
 6. ~~ASME Code for Operation and Maintenance of Nuclear Plants.~~
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10 CFR 50.55a(f).



BASES

ACTIONS

B.1 and B.2 (continued)

Inoperable MFRV bypass valves that are closed and placed in manual or isolated must be verified on a periodic basis that they are closed or isolated. This is necessary to ensure that the assumptions in the safety analysis remain valid. The 7 day Completion Time is reasonable, based on engineering judgment, in view of valve status indications available in the control room, and other administrative controls, to ensure that these valves are closed or isolated.

C.1 and C.2

If the MFRV(s) or the MFRV bypass valve(s) cannot be restored to OPERABLE status, closed, isolated, or the flow path through the valve isolated within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed in at least MODE 3 within 6 hours, and in MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and with

These valves should not be tested at power since even a part stroke exercise increases the risk of a valve closure with the unit generating power.

SURVEILLANCE
REQUIREMENTS

SR 3.7.3.1

This SR verifies that the closure time of each MFRV and MFRV bypass valve is within limits set by the ~~Inservice Testing Program~~. The MFRV isolation times are assumed in the accident and containment analyses. This Surveillance is normally performed upon returning the unit to operation following a refueling outage. This is ~~consistent with the ASME Code (Ref. 2) periodic stroke requirements during operation in MODES 1 and 2.~~

requirements of 10 CFR 50.55a(f) (Ref. 2)

in accordance with the 10 CFR 50.55a(f) (Ref. 2)

~~The Frequency for this SR is in accordance with the Inservice Testing Program.~~

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program in accordance with the requirements of 10 CFR 50.55a(f) (Ref. 2).

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.7.3.2

This SR verifies that each MFRV and MFRV bypass valve can close on an actual or simulated FWI signal. This Surveillance is normally performed upon returning the plant to operation following a refueling outage.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

REFERENCES

1. USAR, Section 11.9.
2. ~~ASME Code for Operation and Maintenance of Nuclear Power Plants.~~

10 CFR 50.55a(f).

BASES

ACTIONS

C.1 and C.2 (continued)

The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from full power conditions in an orderly manner and without challenging unit systems.

requirements of 10 CFR 50.55a(f) (Ref. 3).

SURVEILLANCE
REQUIREMENTS

SR 3.7.4.1

This SR ensures that the SG PORVs are tested through a full control cycle in accordance with the ~~Inservice Testing Program~~. The SG PORV is isolated by the block valve for this test. Performance of inservice testing or use of a SG PORV during a unit cooldown may satisfy this requirement.

requirements of 10 CFR 50.55a(f) (Ref. 3).

Operating experience has shown that ~~these components~~ usually pass the Surveillance when performed in accordance with the ~~Inservice Testing Program~~. The Frequency is acceptable from a reliability standpoint.

SR 3.7.4.2

The function of the block valve is to isolate a failed open SG PORV. Manually cycling the block valve both closed and open demonstrates its capability to perform this function. Performance of inservice testing or use of the block valve during unit cooldown may satisfy this requirement.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

BASES (continued)

- REFERENCES
1. USAR, Section 11.4.
 2. USAR, Section 14.
 3. 10 CFR 50.55a(f).
-
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BASES

SURVEILLANCE
REQUIREMENTS

SR 3.7.5.1 (continued)

operations are an accepted function of the AFW system, OPERABILITY (i.e., the intended safety function) continues to be maintained.

SR 3.7.5.2

Verifying that each AFW pump's developed head at the flow test point is greater than or equal to the required developed head ensures that AFW pump performance has not degraded during the cycle. Differential pressure is a normal test of centrifugal pump performance ~~required by the ASME Code~~ (Ref. 2). This test confirms one point on the pump design curve and is indicative of overall performance. Such ~~inservice~~ tests confirm component OPERABILITY, trend performance, and detect incipient failures by indicating abnormal performance. ~~Performance of inservice testing discussed in the ASME Code (Ref. 2) satisfies this requirement. The Inservice Testing Program specifies the Frequency for testing each pump.~~ This test is considered satisfactory if control board indication and subsequent visual observation of the equipment demonstrate that all components have operated properly.

in accordance with the requirements of 10 CFR 50.55a(f)

The AFW pumps are tested in accordance with the requirements of 10 CFR 50.55a(f) (Ref. 2).

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program in accordance with the requirements of 10 CFR 50.55a(f) (Ref. 2).

This SR is modified by a Note indicating that the SR should be deferred until suitable test conditions are established. This deferral is required because there is insufficient steam pressure to perform the test. This deferral is based on the inservice testing requirements not met; all other requirements for OPERABILITY must be satisfied.

SR 3.7.5.3

This SR verifies that AFW can be delivered to the appropriate steam generator by demonstrating that each automatic valve in the flow path actuates to its correct position on an actual or simulated safety injection signal. This Surveillance is not required for valves that are locked, sealed, or otherwise secured in the required position under

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.7.5.4 (continued)

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This SR is modified by two Notes. Note 1 indicates that the SR be deferred until suitable test conditions are established. This deferral is required because there is insufficient steam pressure to perform the turbine driven AFW pump test. Note 2 states that one or more AFW trains may be considered OPERABLE during alignment and operation for steam generator level control, if it is capable of being manually (i.e., remotely or locally, as appropriate) realigned to the AFW mode of operation, provided it is not otherwise inoperable. This exception allows the system to be out of its normal standby alignment and temporarily incapable of automatic initiation without declaring the train(s) inoperable. Since AFW may be used during MODES 2, 3, and 4 operations for steam generator level control, and these manual operations are an accepted function of the AFW system, OPERABILITY (i.e., the intended safety function) continues to be maintained.

REFERENCES

1. USAR, Section 11.9.
2. ~~ASME Code for Operation and Maintenance of Nuclear Power Plants.~~
3. USAR, Section 14.4.

10 CFR 50.55a(f).

BASES (continued)

SURVEILLANCE
REQUIREMENTS

SR 3.7.11.1

This SR verifies that each SCWS loop actuates on an actual or simulated safety injection actuation signal.

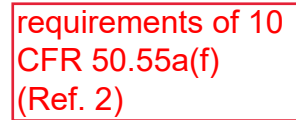
The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.7.11.2

This SR verifies that necessary components in each SCWS loop operate as required.

The Frequency required by the ~~Inservice Testing Program~~ (Ref. 2) is appropriate since degradation of the SCWS could be detected in a timely manner for the components specified based on the known reliability of the components and the loop redundancy.

requirements of 10
CFR 50.55a(f)
(Ref. 2)



REFERENCES

1. USAR, Section 10.4.
2. ~~Inservice Testing Program.~~

10 CFR 50.55a(f).



BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.8.1.4

This SR provides verification that the level of fuel oil in the day tank is at least 300 gallons (Unit 2 - 489 gallons). The limit switch ensures this level is maintained in the day tank. The level is selected to ensure adequate fuel oil for a minimum of 2 hours for Unit 1 (1 hour of DG operation at full load plus 10% for Unit 2).

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

SR 3.8.1.5

This Surveillance demonstrates that each required fuel oil transfer pump operates and transfers fuel oil from its associated storage tank to its associated day tank. This is required to support continuous operation of standby power sources. This Surveillance provides assurance that the fuel oil transfer pump is OPERABLE, the fuel oil piping system is intact, the fuel delivery piping is not obstructed, and the controls and control systems for automatic fuel transfer systems are OPERABLE.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

↑ in accordance with the requirements of 10 CFR 50.55a(f) (Ref, 4)

SR 3.8.1.6

See SR 3.8.1.2.

SR 3.8.1.7

This Surveillance demonstrates the DG capability to reject a load equivalent to the largest single load without tripping. The DG load

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.8.1.11

This Surveillance demonstrates the as designed operation of the standby power sources during loss of the offsite source. This test verifies DG starts on the loss of offsite power. Tests of other design features associated with loss of offsite power are satisfied by SR 3.8.1.10.

The Surveillance Frequency is controlled under the Surveillance Frequency Control Program.

This SR is modified by a Note. The reason for the Note is to minimize wear and tear on the DGs during testing. For the purpose of this testing, the DGs may be started from standby conditions, that is, with the engine coolant and oil continuously circulated and temperature maintained consistent with manufacturer recommendations.

REFERENCES

1. Criterion 39 of:
Atomic Energy Commission Proposed Rule Making, Part 50 - Licensing of Production and Utilization Facilities; General Design Criteria for Nuclear Power Plant Construction Permits, Federal Register 32, No. 132 (July 11, 1967): 10213. [NRC Accession Number: ML043310029]
2. Regulatory Guide 1.9, "Selection, Design, Qualification, and Testing of Emergency Diesel Generator Units Used as Class 1E Onsite Electric Power Systems at Nuclear Power Plants", Revision 3.
3. USAR, Section 14.

4. 10 CFR 50.55a(f).