

Docket Number 50-346
License Number NPF-3
Serial Number 2470
Enclosure 1
Page 1

APPLICATION FOR AMENDMENT

TO

FACILITY OPERATING LICENSE NUMBER NPF-3

DAVIS-BESSE NUCLEAR POWER STATION


UNIT NUMBER 1

Attached are the requested changes to the Davis-Besse Nuclear Power Station, Unit Number 1 Facility Operating License Number NPF-3. Also included is the Safety Assessment and Significant Hazards Consideration.

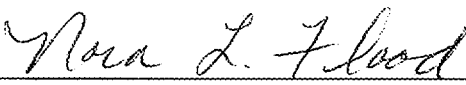
The proposed changes (submitted under cover letter Serial Number 2470) concern Appendix A, Technical Specifications (TS):

| | |
|---------------|--|
| Page III | Index |
| 3/4.1.2.1 | Reactivity Control Systems - Boration Systems - Flowpaths - Shutdown |
| 3/4.1.2.8 | Reactivity Control Systems - Borated Water Sources - Shutdown |
| 3/4.1.2.9 | Reactivity Control Systems - Borated Water Sources - Operating |
| Bases 3/4.1.2 | Boration Systems |

I, Guy G. Campbell, state that (1) I am Vice President - Nuclear of the FirstEnergy Nuclear Operating Company, (2) I am duly authorized to execute and file this certification on behalf of the Toledo Edison Company and The Cleveland Electric Illuminating Company, and (3) the statements set forth herein are true and correct to the best of my knowledge, information and belief.

By: 
Guy G. Campbell, Vice President - Nuclear

Affirmed and subscribed before me this 2nd day of November, 1999.


Notary Public, State of Ohio - Nora L. Flood
My Commission expires September 4, 2002.

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The following information is provided to support issuance of the requested changes to the Davis-Besse Nuclear Power Station (DBNPS), Unit Number 1, Facility Operating License Number NPF-3, Appendix A, Technical Specifications. The proposed changes involve Technical Specification (TS) 3/4.1.2.1, Reactivity Control Systems - Boration Systems - Flowpaths - Shutdown; TS 3/4.1.2.8, Reactivity Control Systems - Borated Water Sources - Shutdown; TS 3/4.1.2.9, Reactivity Control Systems - Borated Water Sources - Operating; and associated Bases 3/4.1.2, Boration Systems. A related change to the TS Index is also proposed.

- A. Time Required to Implement: The License Amendment associated with this license amendment application is to be implemented within 120 days after NRC issuance.
- B. Reason for Change (License Amendment Request Number 97-0003):

The proposed changes would relocate TS 3/4.1.2.8 in its entirety to the DBNPS Updated Safety Analysis Report (USAR) Technical Requirements Manual (TRM). The proposed changes would also relocate TS 3/4.1.2.9 to the USAR TRM, except for portions applicable to the Borated Water Storage Tank (BWST) which are proposed to be deleted. The portions proposed for deletion are redundant to the provisions of existing TS 3/4.5.4, Emergency Core Cooling Systems - Borated Water Storage Tank. Associated with these changes, TS 3/4.1.2.1 is proposed to be revised to delete references to TS 3.1.2.8. The appropriate changes to the TS Index are also proposed, as well as changes to TS Bases 3/4.1.2.

Future proposed changes to the requirements proposed to be relocated to the USAR TRM will be evaluated in accordance with 10 CFR 50.59 and implemented if an unreviewed safety question or Technical Specification change is not involved.

The proposed changes are in accordance with 10 CFR 50.36 and the NRC's "Final Policy Statement on TS Improvements for Nuclear Reactors," dated July 22, 1993. The proposed changes are also in accordance with the guidance provided by the improved "Standard Technical Specifications - Babcock and Wilcox Plants," NUREG-1430, Revision 1.

- C. Safety Assessment and Significant Hazards Consideration: See Attachment.

Docket Number 50-346
License Number NPF-3
Serial Number 2470
Attachment

**SAFETY ASSESSMENT AND SIGNIFICANT HAZARDS CONSIDERATION
FOR
LICENSE AMENDMENT REQUEST NO. 97-0003**

(21 pages follow)

**SAFETY ASSESSMENT AND SIGNIFICANT HAZARDS CONSIDERATION
FOR
LICENSE AMENDMENT REQUEST NO. 97-0003**

TITLE:

Proposed Modification to the Davis-Besse Nuclear Power Station (DBNPS) Operating License NPF-3, Appendix A Technical Specifications to Modify Technical Specification (TS) 3/4.1.2.1, Reactivity Control Systems - Boration Systems - Flow Paths - Shutdown; TS 3/4.1.2.8, Reactivity Control Systems - Borated Water Sources - Shutdown; TS 3/4.1.2.9, Reactivity Control Systems - Borated Water Sources - Operating; and Associated Bases 3/4.1.2, Boration Systems.

DESCRIPTION:

The purpose of this License Amendment Request is to modify Davis-Besse Nuclear Power Station (DBNPS) Operating License NPF-3, Appendix A Technical Specification (TS) 3/4.1.2.1, Reactivity Control Systems - Boration Systems - Flow Paths - Shutdown; TS 3/4.1.2.8, Reactivity Control Systems - Borated Water Sources - Shutdown; TS 3/4.1.2.9, Reactivity Control Systems - Borated Water Sources - Operating; and associated Bases 3/4.1.2, Boration Systems. The TS Index, Page III, is also proposed for revision to reflect these changes. These changes will relocate certain content from the TS, consistent with 10 CFR 50.36 and the guidance provided by the NRC's "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (58 FR 39132, dated July 22, 1993). The proposed changes are also consistent with the NRC's NUREG-1430, Revision 1, "Standard Technical Specifications - Babcock and Wilcox Plants," in that the TS content being relocated from the DBNPS TS is not found in the Standard Technical Specifications.

Technical Specification 3/4.1.2.8, which provides boron injection source requirements applicable in Mode 5 (Cold Shutdown) and Mode 6 (Refueling) for the Boric Acid Addition System (BAAS) and the Borated Water Storage Tank (BWST), would be relocated in its entirety to the DBNPS Updated Safety Analysis Report (USAR) Technical Requirements Manual (TRM).

Technical Specification 3/4.1.2.9, which provides requirements applicable in Mode 1 (Power Operation) through Mode 4 (Hot Shutdown) for the BAAS and the BWST would be partially relocated to the USAR TRM. Since the TS 3/4.1.2.9 requirements applicable to the BWST are presently completely duplicated by TS 3/4.5.4, Emergency Core Cooling Systems - Borated Water Storage Tank, only the portion applicable to the BAAS, including TS Figure 3.1-1, "Boric Acid Addition System Minimum Required Volume as a Function of Boric Acid Concentration Required in Modes 1-4," would be relocated to the USAR TRM. The portion applicable to the BWST in TS 3/4.1.2.9 is proposed to be deleted.

Associated with the above changes, Page III of the TS Index is proposed to be revised to remove the entries for TS 3/4.1.2.8 and TS 3/4.1.2.9.

The TS 3/4.1.2.1 Limiting Condition for Operation (LCO) is proposed to be revised to delete the references to Specification 3.1.2.8. These references provide the location of the Mode 5 and Mode 6 operability requirements for the BAAS and BWST, however, as previously described, Specification 3.1.2.8 is proposed for relocation to the USAR TRM. To address this change, an addition is proposed for Bases 3/4.1.2 to refer to the USAR for the applicable requirements for the BAAS and BWST.

Technical Specification Bases 3/4.1.2 is proposed to be revised as follows:

- Clarify that the boron injection system components required to perform negative reactivity control depends on the operating condition. For example, the number of makeup pumps required to be operable will depend on whether the plant is in Modes 1 through 4, or in Mode 6.
- Delete the discussion of the eight-hour limit to correct a condition where the BWST boron concentration or borated water temperature is not within limits. This discussion is in reference to TS LCO 3.1.2.9 Action statement "b", which is proposed to be deleted. A similar discussion is already provided in remaining Bases 3/4.5.4, Borated Water Storage Tank, which is in reference to TS LCO 3.5.4 Action statement "a".
- Delete the detailed discussions of the boration capability of the BAAS and BWST since as previously noted, the associated requirements are either being relocated to the USAR or are being removed if they are redundant to TS 3/4.5.4, and add references to the USAR and/or Limiting Condition for Operation (LCO) 3.5.4 for specific requirements.
- Delete the discussion of BWST level instrumentation calibration and the boron concentration pH band since this discussion is in reference to requirements either being relocated to the USAR or being removed if they are redundant to TS 3/4.5.4. Furthermore, this discussion is completely redundant to the same discussion already provided in Bases 3/4.5.4.

Those portions of the TS requirements proposed for relocation would be relocated to Section 3/4.1, Reactivity Control Systems, of the DBNPS USAR TRM. In general, the TS requirements that are proposed for relocation would be incorporated into the TRM with the same content they possessed as part of the Operating License. However, the format will be changed to match that of the TRM. The TRM is part of the USAR and it is, therefore, required that any revisions to it be evaluated under the regulatory requirements of Section 50.59, "Changes, Tests and Experiments," of Title 10 of the Code of Federal Regulations (10 CFR 50.59).

For requirements relocated to the USAR TRM as a result of the proposed changes, the DBNPS will be afforded the flexibility to control and evaluate future revisions in accordance with

10 CFR 50.59, without the need for the DBNPS and the NRC to process a License Amendment Request, when such changes are not an unreviewed safety question or do not involve a change to a TS. Future changes to the TRM will be submitted to the NRC in accordance with the USAR revision requirements of 10 CFR 50.71(e). The relocation of the requirements of TS 3/4.1.2.8 and 3/4.1.2.9 to the TRM, as discussed above, will be completed no later than the implementation of the NRC-approved License Amendment that allows for their removal from the TS.

SYSTEMS, COMPONENTS, AND ACTIVITIES AFFECTED:

The proposed changes affect the administrative location of the operability and testing requirements for portions of the DBNPS boration systems, including the Boric Acid Addition System (BAAS) and the Borated Water Storage Tank (BWST).

FUNCTIONS OF THE AFFECTED SYSTEMS, COMPONENTS, AND ACTIVITIES:

The boration systems ensure that negative reactivity control is available during each mode of facility operation. Two boron injection systems are provided. One flow path utilizes a makeup pump or decay heat removal (DHR) pump to inject borated water from the borated water storage tank (BWST) into the Reactor Coolant System (RCS). The other flow path utilizes a boric acid pump, and a makeup pump or DHR pump to inject borated water from the boric acid addition tanks (BAATs) into the RCS.

The BWST is described in Section 6.3.2.6, "ECCS Coolant Storage," and Section 9.3.5, "Decay Heat Removal System," of the DBNPS Updated Safety Analysis Report (USAR). The BWST is located outside, adjacent to the auxiliary building. In addition to its boration system function, the BWST supplies borated water for the emergency core cooling system (ECCS) low pressure injection (LPI) pumps, high pressure injection (HPI) pumps, and containment spray pumps. The ECCS is described in USAR Section 6.3, "Emergency Core Cooling System". The BWST is also used for filling the refueling canal during refueling, as a source of makeup water to the spent fuel pool cooling system, and can serve as a water source for the makeup pumps.

The BAATs are part of the boric acid addition system (BAAS), which is described in Section 9.3.6, "Chemical Addition System," of the USAR. The BAAS includes two BAATs for storage of concentrated boric acid solution, and two centrifugal boric acid pumps to facilitate transfer of the concentrated boric acid solution from the BAATs to the makeup tank for addition to the RCS. The BAATs are located within the auxiliary building. The chemical addition system is not credited for mitigation of any USAR Chapter 6 or Chapter 15 accidents. The BAAS is credited for providing safe shutdown capability in the event the BWST is lost by a tornado missile, as described in USAR Section 9.3.6.3.1, "Reliability Considerations." However, the BAAS is not part of the primary success path which functions to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

In addition to its boration system function, the borated water in the BAATs can also be transferred to the BWST, the clean waste receiver tanks, or the spent fuel storage pool.

EFFECTS ON SAFETY:

Section 50.36, "Technical Specifications," of Title 10 of the Code of Federal Regulations (10 CFR) establishes the regulatory requirements for licenses to include TS as part of applications for operating licenses. In addition, the Nuclear Regulatory Commission's "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (58 FR 39132, dated July 22, 1993), provides guidance regarding the required content of TS. The fundamental purpose of the TS, as described in the NRC's Final Policy Statement, is to impose those conditions or limitations upon reactor operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. This is accomplished by identifying those features that are of controlling importance to nuclear safety and establishing on them certain TS conditions of operation which cannot be changed without prior NRC approval.

The NRC's Final Policy Statement recognized, as had previous statements related to the NRC Staff's "TS Improvement Program," that implementation of the policy would result in the relocation of some existing TS requirements to licensee-controlled documents such as the USAR. Those items relocated to the USAR would, in turn, be controlled in accordance with the requirements of 10 CFR 50.59. 10 CFR 50.59 provides criteria to determine when facility or operating changes planned by a licensee require prior NRC approval in the form of a license amendment in order to address any unreviewed safety questions or TS changes.

The NRC's Final Policy Statement also recognized the benefit in allowing licensees to improve portions of their TS. This approach results in greater consistency in TS requirements and allows for the most efficient use of NRC and industry staff resources in processing TS changes.

The requirements of TS 3/4.1.2.8 and portions of TS 3/4.1.2.9 proposed for relocation to the USAR TRM do not meet current criteria for inclusion in the Technical Specifications as published by the NRC in the aforementioned "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," and as listed in 10 CFR 50.36. Specifically, 10 CFR 50.36 (c)(2)(ii) states that a TS limiting condition for operation of a nuclear reactor must be established for each item meeting one or more of the following criteria:

- Criterion 1 Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

As described in the Federal Register Notice (58 FR 39132) of the NRC's Final Policy Statement regarding the four criteria to be used in determining whether a particular item is to be retained in the TS, the purpose of this criterion is to ensure that the TS control those instruments specifically installed to detect RCS leakage.

- Criterion 2 A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

As described in the Federal Register Notice, the purpose of this criterion is to capture those process variables that have initial values assumed in the design basis accident and transient analyses, and which are monitored and controlled during power operation.

- Criterion 3 A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

As described in the Federal Register Notice, the purpose of this criterion is to capture only structures, systems, and components that are part of the primary success path of a safety sequence analysis. The primary success path does not include backup and diverse equipment.

- Criterion 4 A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

As described in the Federal Register Notice, the purpose of this criterion is to retain in TS those requirements that the probabilistic safety assessment or operating experience has shown to be significant to public health and safety.

An evaluation of the TS 3/4.1.2.8 (BAAS/BWST during Modes 5 and 6) and 3/4.1.2.9 (BAAS during Modes 1 through 4) requirements proposed for relocation to the USAR TRM against these criteria follows:

- Criterion 1 The BAAS and BWST are not installed instrumentation that are used to detect degradation of the reactor coolant pressure boundary in any plant operational mode. The BAAS and BWST are borated water sources which function, as part of the boron injection system, to ensure that negative reactivity control is available during each mode of plant operation. Thus, these borated water sources do not meet Criterion 1 for inclusion in the TSs.
- Criterion 2 The BAAS is not a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The chemical addition system, which includes the BAAS, is not credited for mitigation of any USAR Chapter 6 or Chapter 15 accidents. Therefore, the BAAS does not meet Criterion 2 and its TS 3/4.1.2.8 and 3/4.1.2.9 requirements can be relocated from the TS to the USAR.

The BWST during Mode 5 (Cold Shutdown) and Mode 6 (Refueling) is not a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The use of boration in Mode 5 to recover shutdown margin as corrective action will remain a requirement under TS 3/4.1.1.1, Reactivity Control Systems – Boration Control – Shutdown Margin. The use of boration in Mode 6 to maintain the reactor subcritical during core alterations or during the addition of water to the RCS will remain a requirement under TS 3/4.9.1, Refueling Operations – Boron Concentration. Therefore, the requirements for the BWST in TS 3/4.1.2.8 may be relocated from the TS to the USAR TRM.

The BWST requirements in TS 3/4.1.2.9, applicable during Modes 1 through 4, are completely duplicated in existing TS 3/4.5.4. Therefore, the BWST requirements will continue to meet Criterion 2, even with the deletion of TS 3/4.1.2.9, by means of retaining TS 3/4.5.4.

Criterion 3 The BAAS is not a structure, system, or component that is part of the primary success path which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The BAAS is not credited for the mitigation of any USAR Chapter 6 or Chapter 15 accidents (e.g., the boron dilution accident). Therefore, the BAAS does not meet Criterion 3 and its TS 3/4.1.2.8 and 3/4.1.2.9 requirements can be relocated to the USAR TRM.

The BWST during Modes 5 and 6 is not used to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The boron dilution accident described in USAR Section 15.2.4, "Makeup and Purification System Malfunction," is addressed without relying on the BWST as the primary success path. Therefore, the BWST during Modes 5 and 6 does not meet Criterion 3 and its TS 3/4.1.2.8 requirements can be relocated to the USAR TRM.

The BWST requirements in TS 3/4.1.2.9, applicable during Modes 1 through 4, are completely duplicated in existing TS 3/4.5.4. Therefore, the BWST requirements will continue to be included in the TS to meet Criterion 3, even with the deletion of TS 3/4.1.2.9, by means of retaining TS 3/4.5.4.

Criterion 4 With respect to boration capability during Modes 5 and 6, the BAAS and BWST have not been shown significant to public health and safety by either operational experience or plant-specific probabilistic risk assessment. Therefore, the BAAS and BWST requirements of TS 3/4.1.2.8 can be relocated to the USAR TRM.

As previously noted, the BAAS is not credited for mitigation of any USAR Chapter 6 or Chapter 15 accidents. Further, plant-specific probabilistic safety analyses have demonstrated that the BAAS is not risk significant during Modes 1 through 4. Accordingly, the BAAS does not meet Criterion 4, and its requirements can be relocated from TS 3/4.1.2.9 to the USAR TRM.

The BWST's requirements for Modes 1 through 4 concerning the ECCS are duplicated in TS 3/4.5.4, that will be retained. Therefore, the BWST requirements will continue to be included in the TS, even with the deletion of TS 3/4.1.2.9, by means of retaining TS 3/4.5.4.

In summary, the proposed relocation of TS requirements 3/4.1.2.8 (BAAS and BWST during Modes 5 and 6) and 3/4.1.2.9 (BAAS during Modes 1 through 4) to the USAR TRM is in accordance with NRC regulations and policy. Further, the proposed relocation will not impact the capabilities of any system or component. Under the proposed changes, similar operation, maintenance, testing and system operability controls for the affected systems and components will be maintained. Any future changes to the USAR TRM will be evaluated, prior to implementation, in accordance with the regulatory requirements of 10 CFR 50.59. Therefore, the proposed changes will have no adverse effect on nuclear safety.

As discussed above, the portion of TS 3/4.1.2.9 requirements (Modes 1 through 4) applicable to the BWST is already completely duplicated by the existing requirements of TS 3/4.5.4, Emergency Core Cooling Systems - Borated Water Storage Tank. Therefore, removal of this portion of TS 3/4.1.2.9, without subsequent relocation to the TRM, is appropriate. Since plant Mode 1 through Mode 4 requirements for the BWST will continue to be controlled under TS 3/4.5.4, this change will have no adverse effect on nuclear safety.

The remaining changes proposed to the TS Index, TS 3/4.1.2.1, and Bases 3/4.1.2 are administrative changes associated with the changes to TS 3/4.1.2.8 and TS 3/4.1.2.9, and will have no adverse effect on nuclear safety.

SIGNIFICANT HAZARDS CONSIDERATION:

The Nuclear Regulatory Commission has provided standards in 10 CFR 50.92(c) for determining whether a significant hazard exists due to a proposed amendment to an Operating License for a facility. A proposed amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed changes would: (1) Not involve a significant increase in the probability or consequences of an accident from any accident previously evaluated; (2) Not create the possibility of a new or different kind of accident from any accident previously evaluated; or (3) Not involve a significant reduction in a margin of safety. The Davis-Besse Nuclear Power Station has reviewed the proposed changes and determined that a significant hazard consideration does not exist because operation of the Davis-Besse Nuclear Power Station, Unit No. 1, in accordance with these changes would:

- 1a. Not involve a significant increase in the probability of an accident previously evaluated because no change is being made to any accident initiator. No previously analyzed accident scenario is changed, and initiating conditions and assumptions remain as previously analyzed.

The proposed changes would relocate the Boric Acid Addition System (BAAS) and Borated Water Storage Tank (BWST) requirements of TS 3/4.1.2.8 in their entirety to the DBNPS Updated Safety Analysis Report (USAR) Technical Requirements Manual (TRM). The proposed changes would also relocate the BAAS requirements of TS 3/4.1.2.9 to the USAR TRM. The portions of TS 3/4.1.2.9 applicable to the BWST are proposed to be deleted because they are completely redundant to the existing provisions of TS 3/4.5.4, Emergency Core Cooling Systems - Borated Water Storage Tank. Associated with these changes, TS 3/4.1.2.1 is proposed to be revised to delete references to TS 3.1.2.8. The appropriate changes to the TS Index are also proposed, as well as changes to TS Bases 3/4.1.2. The proposed changes are in accordance with 10 CFR 50.36 and the NRC's "Final Policy Statement on TS Improvements for Nuclear Power Reactors," dated July 22, 1993. The proposed changes are also consistent with the improved "Standard Technical Specifications - Babcock and Wilcox Plants," NUREG-1430, Revision 1.

- 1b. Not involve a significant increase in the consequences of an accident previously evaluated because the proposed changes do not affect accident conditions or assumptions used in evaluating the radiological consequences of an accident. The proposed changes do not alter the source term, containment isolation or allowable radiological releases.

The chemical addition system, which includes the BAAS, is not credited for mitigation of any USAR Chapter 6 or Chapter 15 accidents. The BWST is credited for mitigation of USAR Chapter 6 and Chapter 15 accidents, as part of the Emergency Core Cooling System (ECCS). However, the BWST's requirements concerning the ECCS are provided in separate TS 3/4.5.4, that is not proposed for change.

2. Not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed changes do not change the way the plant is operated, and no new or different failure modes have been defined for any plant system or component important to safety. No new or different types of failures or accident initiators are introduced by the proposed changes.
3. Not involve a significant reduction in a margin of safety because the proposed changes are administrative in nature, consisting of deletion and/or relocation of certain TS requirements into licensee-controlled documents, and have no bearing on the margin of safety which exists in the present TS or Updated Safety Analysis Report (USAR).

CONCLUSION:

On the basis of the above, the Davis-Besse Nuclear Power Station has determined that the License Amendment Request does not involve a significant hazards consideration. As this License Amendment Request concerns a proposed change to the Technical Specifications that must be reviewed by the Nuclear Regulatory Commission, this License Amendment Request does not constitute an unreviewed safety question.

ATTACHMENT:

Attached are the proposed marked-up changes to the Operating License.

REFERENCES:

1. Davis-Besse Nuclear Power Station (DBNPS) Unit No. 1, Operating License NPF-3, Appendix A, Technical Specifications, through Amendment 233.
2. DBNPS Updated Safety Analysis Report (USAR), through Revision 21:
Section 6.3, "Emergency Core Cooling System"
Section 6.3.2.6, "ECCS Coolant Storage"
Section 9.3.5, "Decay Heat Removal System"
Section 9.3.6, "Chemical Addition System"
Section 15.2.4, "Makeup and Purification System Malfunction"
3. The NRC "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," (58 FR 39132, dated July 22, 1993).
4. Improved "Standard Technical Specifications for Babcock and Wilcox Plants," NUREG-1430, Revision 1, dated April, 1995.
5. 10 CFR 50.36, "Technical Specifications."
6. 10 CFR 50.59, "Changes, Tests and Experiments."
7. 10 CFR 50.71, "Maintenance of Records, Making of Reports."