Niagara Mohawk

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June 7, 2000
NMP2L 1967

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Subject: Administrative Corrections to Improved Technical Specification 3.10.8 (TAC No. MA9094)

Gentlemen:

Niagara Mohawk Power Corporation (NMPC) hereby transmits an Application for Amendment to Nine Mile Point Unit 2 (NMP2) Operating License NPF-69. Also enclosed as Attachment A is the proposed change to the Technical Specifications (TS) as set forth in Appendix A to the above mentioned license. Supporting information and an analysis, demonstrating that the proposed change involves no significant hazards consideration pursuant to 10 CFR 50.92, are included as Attachment B. A hand marked-up copy of the affected TS pages is provided as Attachment C to assist in your review.

The proposed changes contained herein do not affect the Current Technical Specifications (CTS). However, the changes affect License Amendment No. 91 which converts the NMP2 CTS to the Improved Technical Specifications (ITS). License Amendment No. 91 was effective as of its date of issuance (i.e., February 15, 2000) and will be implemented, as stated in the License Amendment, no later than August 31, 2000.

The proposed changes affect ITS Specification 3.10.8, titled "SHUTDOWN MARGIN (SDM) Test-Refueling." The following aspects of this Specification are revised: ITS Limiting Condition for Operation (LCO) 3.10.8.a, ITS Surveillance Requirement (SR) 3.10.8.1 and the associated ITS Bases. The references to Function 2.e of ITS Table 3.3.1.1-1 are changed to Function 2.f to be consistent with the changes to ITS Table 3.3.1.1-1, titled "Reactor Protection System Instrumentation." These proposed changes are administrative corrections in that an error of omission was introduced by NMPC in our submittal dated February 7, 2000. Specifically, Niagara Mohawk did not revise ITS Specification 3.10.8 to reflect re-numbering of functions on ITS Table 3.3.1.1-1. The changes to ITS Table 3.3.1.1-1 were approved by the Staff in License Amendment No. 92 that permitted use of the already-installed Oscillation Power Range Monitor (OPRM).

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Niagara Mohawk requests that the NRC approve these proposed changes by July 17, 2000, so that these changes can be implemented concurrently with License Amendment No. 91 which is currently scheduled to be completed by August 4, 2000.

Pursuant to 10 CFR 50.91 (b) (1), NMPC has provided a copy of this amendment request and the associated analysis regarding no significant hazards determination to the appropriate state representative.

Sincerely,

John H. Mueller
Senior Vice President and
Chief Nuclear Officer

Attachments

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Mr. M. K. Gamberoni, Acting Section Chief PD-I, Section 1, NRR
Mr. G. K. Hunegs, NRC Senior Resident Inspector
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Records Management

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
NIAGARA MOHAWK POWER CORPORATION	)	**Docket No. 50-410**
	)	
Nine Mile Point Nuclear Station Unit 2	)	

APPLICATION FOR AMENDMENT TO OPERATING LICENSE

Pursuant to Section 50.90 of the Regulations of the Nuclear Regulatory Commission, Niagara Mohawk Power Corporation, holder of Facility Operating License No. NPF-69, hereby requests that ITS Specification 3.10.8, titled "SHUTDOWN MARGIN (SDM) Test- Refueling" of the TS as set forth in Appendix A to that License be amended. The proposed change has been reviewed in accordance with Section 6.5, titled "Review and Audit," of the TS.

The following aspects of Specification 3.10.8 are revised: ITS Limiting Condition for Operation (LCO) 3.10.8.a, ITS Surveillance Requirement (SR) 3.10.8.1 and the associated ITS Bases. The reference to Function 2.e of ITS Table 3.3.1.1-1 is changed to Function 2.f to be consistent with the changes to ITS Table 3.3.1.1-1 that were approved by the Staff in License Amendment No. 92 that permitted use of the already-installed OPRM.

The proposed change will not authorize any change in the types of effluents or in the authorized power level of the facility in conjunction with this Application for License Amendment. Supporting information and analysis which demonstrate that the proposed change does not involve a significant hazards consideration, pursuant to 10 CFR 50.92, are included as Attachment B.

Wherefore, the Applicant respectfully requests that Appendix A to Facility Operating License No. NPF-69 be amended in the form attached hereto as Attachment A.

NIAGARA MOHAWK POWER CORPORATION

By

John H. Mueller
Senior Vice President and
Chief Nuclear Officer

SANDRA A. OSWALD
Notary Public, State of New York
No. 01OS6032276
Qualified in Oswego County
Commission Expires 10/23/01

Subscribed and sworn to before me
on this 7th day of June 2000.

Sandra A. Oswald
NOTARY PUBLIC

ATTACHMENT A

NIAGARA MOHAWK POWER CORPORATION
LICENSE NO. NPF-69
DOCKET NO. 50-410

Proposed Change to the ITS

Replace the following ITS pages with the attached ITS pages. The revised pages are identified by amendment or revision number and contain vertical lines indicating the areas of change.

Remove	Insert
3.10.8-1	3.10.8-1
3.10.8-2	3.10.8-2
B 3.10.8-2	B 3.10.8-2
B 3.10.8-5	B 3.10.8-5

3.10 SPECIAL OPERATIONS

3.10.8 SHUTDOWN MARGIN (SDM) Test—Refueling

LCO 3.10.8 The reactor mode switch position specified in Table 1.1-1 for MODE 5 may be changed to include the startup/hot standby position, and operation considered not to be in MODE 2, to allow SDM testing, provided the following requirements are met:

a. LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," MODE 2 requirements for Functions 2.a, 2.d, and 2.f of Table 3.3.1.1-1;

b. 1. LCO 3.3.2.1, "Control Rod Block Instrumentation," MODE 2 requirements for Function 2 of Table 3.3.2.1-1, with the banked position withdrawal sequence requirements of SR 3.3.2.1.8 changed to require the control rod sequence to conform to the SDM test sequence,

OR

2. Conformance to the approved control rod sequence for the SDM test is verified by a second licensed operator or other qualified member of the technical staff;

c. Each withdrawn control rod shall be coupled to the associated CRD;

d. All control rod withdrawals during out of sequence control rod moves shall be made in single notch withdrawal mode;

e. No other CORE ALTERATIONS are in progress; and

f. CRD charging water header pressure $\geq$ 940 psig.

APPLICABILITY: MODE 5 with the reactor mode switch in startup/hot standby position.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
----------NOTE---------- Separate Condition entry is allowed for each control rod. ---------- A. One or more control rods not coupled to its associated CRD.	----------NOTE---------- Rod Worth Minimizer may be bypassed as allowed by LCO 3.3.2.1, if required, to allow insertion of inoperable control rod and continued operation. ---------- A.1 Fully insert inoperable control rod. AND A.2 Disarm the associated CRD.	 3 hours 4 hours
B. One or more of the above requirements not met for reasons other than Condition A.	B.1 Place the reactor mode switch in the shutdown or refuel position.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.10.8.1	Perform the MODE 2 applicable SRs for LCO 3.3.1.1, Functions 2.a, 2.d, and 2.f of Table 3.3.1.1-1.	According to the applicable SRs

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

CRDA analyses assume that the reactor operator follows prescribed withdrawal sequences. For SDM tests performed within these defined sequences, the analysis of Reference 1 is applicable. However, for some sequences developed for the SDM testing, the control rod patterns assumed in the safety analysis of Reference 1 may not be met. Therefore, special CRDA analyses, performed in accordance with an NRC approved methodology, are required to demonstrate that the SDM test sequence will not result in unacceptable consequences should a CRDA occur during the testing. For the purpose of this test, the protection provided by the normally required MODE 5 applicable LCOs, in addition to the requirements of this LCO, will maintain normal test operations as well as postulated accidents within the bounds of the appropriate safety analysis (Ref. 1). In addition to the added requirements for the rod worth minimizer (RWM), APRM, and control rod coupling, the single notch withdrawal mode is specified for out of sequence withdrawals. Requiring the single notch withdrawal mode limits withdrawal steps to a single notch, which limits inserted reactivity, and allows adequate monitoring of changes in neutron flux, which may occur during the test.

As described in LCO 3.0.7, compliance with Special Operations LCOs is optional, and therefore, no criteria of Reference 2 apply. Special Operations LCOs provide flexibility to perform certain operations by appropriately modifying requirements of other LCOs. A discussion of the criteria satisfied for the other LCOs is provided in their respective Bases.

LCO

As described in LCO 3.0.7, compliance with this Special Operations LCO is optional. SDM tests may be performed while in MODE 2, in accordance with Table 1.1-1, without meeting this Special Operations LCO or its ACTIONS. For SDM tests performed while in MODE 5, additional requirements must be met to ensure that adequate protection against potential reactivity excursions is available. To provide additional scram protection, beyond the normally required IRMs, the APRMs are also required to be OPERABLE (LCO 3.3.1.1, Functions 2.a, 2.d, and 2.f) as though the reactor were in MODE 2. Because multiple control rods will be withdrawn and the reactor will potentially become critical, the approved control rod withdrawal sequence

(continued)

BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.10.8.1, SR 3.10.8.2, and SR 3.10.8.3

LCO 3.3.1.1, Functions 2.a, 2.d, and 2.f, made applicable in this Special Operations LCO, are required to have applicable Surveillances met to establish that this Special Operations LCO is being met (SR 3.10.8.1). However, the control rod withdrawal sequences during the SDM tests may be enforced by the RWM (LCO 3.3.2.1, Function 2, MODE 2 requirements) or by a second licensed operator (Reactor Operator or Senior Reactor Operator) or other qualified member of the technical staff (e.g., a qualified shift technical advisor or reactor engineer). As noted, either the applicable SRs for the RWM (LCO 3.3.2.1) must be satisfied according to the applicable Frequencies (SR 3.10.8.2), or the proper movement of control rods must be verified (SR 3.10.8.3). This latter verification (i.e., SR 3.10.8.3) must be performed during control rod movement to prevent deviations from the specified sequence. These Surveillances provide adequate assurance that the specified test sequence is being followed.

SR 3.10.8.4

Periodic verification of the administrative controls established by this LCO will ensure that the reactor is operated within the bounds of the safety analysis. The 12 hour Frequency is intended to provide appropriate assurance that each operating shift is aware of and verifies compliance with these Special Operations LCO requirements.

SR 3.10.8.5

Coupling verification is performed to ensure the control rod is connected to the control rod drive mechanism and will perform its intended function when necessary. The verification is required to be performed any time a control rod is withdrawn to the "full-out" notch position or prior to declaring the control rod OPERABLE after work on the control rod or CRD System that could affect coupling. This Frequency is acceptable, considering the low probability that a control rod will become uncoupled when it is not being moved as well as operating experience related to uncoupling events.

(continued)

ATTACHMENT B

NIAGARA MOHAWK POWER CORPORATION
LICENSE NO. NPF-69
DOCKET NO. 50-410

Supporting Information and No Significant Hazards Consideration Analysis

INTRODUCTION

By letter dated October 16, 1998 (NMP2L 1830), NMPC proposed changes to the NMP2 CTS that would convert the Unit 2 CTS to the ITS. The NRC issued License Amendment No. 91 by letter dated February 15, 2000 which approved conversion of the NMP2 CTS to the ITS. As indicated in License Amendment No. 91, this License Amendment was effective on the date of issuance and is to be implemented by August 31, 2000.

By letter dated October 25, 1999 (NMP2L 1907), NMPC proposed changes to the NMP2 CTS that would permit use of the already-installed OPRM. The October 25, 1999 letter included CTS changes to the pre-Amendment No. 91 version of the TS (i.e., pre-ITS version). By letter dated February 7, 2000 (NMP2L 1932), NMPC provided additional OPRM related changes that would convert the CTS to the ITS. The NRC issued License Amendment No. 92 by letter dated March 2, 2000 with regards to the installed OPRM. This Amendment contained both the CTS and ITS pages.

License Amendment No. 92 was implemented during the refueling outage of the spring of 2000. Specifically, the pre-ITS set of CTS changes was implemented. The ITS set of changes associated with License Amendment No. 92 will be implemented concurrently with License Amendment No. 91, the ITS conversion License Amendment.

During the development of the ITS set of changes included in our letter dated February 7, 2000, an error of omission was made with regards to the OPRM License Amendment. The note "(k)" of CTS (i.e., pre-ITS version) Table 3.3.1-1, titled "Reactor Protection System Instrumentation Setpoints," requires that CTS functions 2.a, 2.d and 2.e be operable in operational condition 5 during shutdown margin demonstrations performed per CTS Specification 3.10.3. The requirement of note "(k)" was unchanged by our October 25, 1999 submittal. The level of detail in CTS Specification 3.10.3 is such that the alphanumeric designations of CTS Table 3.3.1-1 were not referenced in CTS Specification 3.10.3. However, these alphanumeric designations were provided in License Amendment No. 91 for ITS Specification 3.10.8 which is the corresponding Specification for CTS 3.10.3.

INTRODUCTION (cont'd)

The error of omission was introduced by NMPC in that our February 7, 2000 submittal did not revise ITS Specification 3.10.8 consistent with the changes made to ITS Table 3.3.1.1 with regards to the inclusion of the OPRM function. Specifically, NMPC did not revise ITS LCO 3.10.8.a, ITS SR 3.10.8.1 and associated Bases to reflect the re-numbering of Function 2.e to 2.f on ITS Table 3.3.1.1-1 as a consequence of the insertion of a new Reactor Protection System (RPS) function (i.e., Function 2.e, "OPRM-Upscale").

EVALUATION

NMPC proposes changes to ITS Specification 3.10.8 whereby the following aspects of this Specification are revised: ITS LCO 3.10.8.a, ITS SR 3.10.8.1 and the associated ITS Bases. These changes replace the references to Function 2.e with references to Function 2.f. These changes correct an error of omission that was made in NMPC's submittal dated February 7, 2000, with regards to the re-numbering of Function 2.e to 2.f on ITS Table 3.3.1.1-1 as a consequence of the insertion of a new RPS function. The February 7, 2000 submittal identified Function 2.e (the new RPS function) as "OPRM-Upscale" and Function 2.f as "2-Out-of-4 Voter."

These proposed changes will ensure that the proper portions of the RPS are required to be operable and that appropriate surveillances are performed to enable shutdown margin testing during refueling while the plant is in mode 5 with the reactor mode switch in the startup/hot standby position. These operability and surveillance requirements will ensure mitigation of unacceptable reactivity excursions during control rod withdrawal under these plant conditions. Accordingly, these changes will maintain test operations as well as postulated accidents within the bounds of the safety analysis as described in Section 15.4.9 of the Updated Safety Analysis Report for a Control Rod Drop Accident.

CONCLUSION

This amendment application revises ITS Specification 3.10.8, titled "SHUTDOWN MARGIN (SDM) Test - Refueling." The following aspects of this specification are revised: ITS LCO 3.10.8.a, ITS SR 3.10.8.1 and the associated Bases. The references to Function 2.e of ITS Table 3.3.1.1-1 are changed to Function 2.f to be consistent with the changes to ITS Table 3.3.1.1-1 that were approved by the Staff in License Amendment No. 92 that permitted use of the already-installed OPRM.

These proposed changes will ensure that the proper portions of the RPS are required to be operable and appropriate surveillances performed to enable shutdown margin testing during refueling while the plant is in mode 5 with the reactor mode switch in the startup/hot standby position. Accordingly, these changes will maintain test operations as well as postulated accidents within the bounds of the safety analysis as described in Section 15.4.9 of the Updated Safety Analysis Report for a Control Rod Drop Accident.

NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

10 CFR 50.91 requires that at the time a licensee requests an amendment, it must provide to the NRC its analysis using the standards in 10 CFR 50.92 concerning the issue of no significant hazards consideration. According to 10 CFR 50.92(c) a proposed amendment to an operating license involves no significant hazards considerations if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated; or

2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or

3. Involve a significant reduction in a margin of safety.

NMPC has evaluated this proposed amendment pursuant to 10 CFR 50.91 and has determined that it involves no significant hazards considerations.

The following analyses have been performed.

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not involve a significant increase in the probability or consequences of an accident previously evaluated.

Changes are proposed to ITS Specification 3.10.8 whereby the following aspects of this Specification are revised: ITS LCO 3.10.8.a, ITS SR 3.10.8.1 and the associated ITS Bases. These changes replace references to Function 2.e with references to Function 2.f. These Functions are associated with the ITS RPS Instrumentation Table 3.3.1.1-1. "OPRM-Upscale" is Function 2.e and "2-Out-Of-4 Voter" is Function 2.f on the ITS RPS Table. Since neither of these functions are assumed to be initiators of any design basis accident or transient, the changes do not involve a significant increase in the probability of an accident previously evaluated.

The proposed changes to ITS LCO 3.10.8.a, ITS SR 3.10.8.1 and associated Bases ensure that the proper portions of the RPS are required to be operable and that appropriate surveillances are performed to enable shutdown margin testing during certain plant conditions. These operability and surveillance requirements will ensure mitigation of unacceptable reactivity excursions during control rod withdrawal. Therefore, these changes will maintain test operations as well as postulated accidents within the bounds of the safety analysis as described in Section 15.4.9 of the Updated Safety Analysis Report for a Control Rod Drop Accident. Accordingly, these changes do not involve a significant increase in the consequences of an accident previously evaluated.

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes do not introduce any new failure modes. The proposed changes ensure that proper portions of the RPS are required to be operable and that appropriate surveillances are performed to enable shutdown margin testing. Therefore, the proposed change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The operation of Nine Mile Point Unit 2, in accordance with the proposed amendment, will not involve a significant reduction in a margin of safety.

The proposed changes ensure that the proper RPS functions are required to be operable and surveilled consistent with the safety analysis as described in Section 15.4.9 of the Updated Safety Analysis Report for a Control Rod Drop Accident. Therefore, operation in accordance with the proposed amendment will not involve a significant reduction in a margin of safety.

ATTACHMENT C

NIAGARA MOHAWK POWER CORPORATION
LICENSE NO. NPF-69
DOCKET NO. 50-410

Mark-Up Copy of the Proposed Change to the ITS

Pages 3.10.8-1, 3.10.8-2, B 3.10.8-2 and B 3.10.8-5 of the NMP2 ITS have been marked-up by hand to reflect the proposed ITS changes.

3.10 SPECIAL OPERATIONS

3.10.8 SHUTDOWN MARGIN (SDM) Test—Refueling

LCO 3.10.8 The reactor mode switch position specified in Table 1.1-1 for MODE 5 may be changed to include the startup/hot standby position, and operation considered not to be in MODE 2, to allow SDM testing, provided the following requirements are met:

a. LCO 3.3.1.1, "Reactor Protection System (RPS) Instrumentation," MODE 2 requirements for Functions 2.a, 2.d, and 2.f of Table 3.3.1.1-1;

b. 1. LCO 3.3.2.1, "Control Rod Block Instrumentation," MODE 2 requirements for Function 2 of Table 3.3.2.1-1, with the banked position withdrawal sequence requirements of SR 3.3.2.1.8 changed to require the control rod sequence to conform to the SDM test sequence,

OR

2. Conformance to the approved control rod sequence for the SDM test is verified by a second licensed operator or other qualified member of the technical staff;

c. Each withdrawn control rod shall be coupled to the associated CRD;

d. All control rod withdrawals during out of sequence control rod moves shall be made in single notch withdrawal mode;

e. No other CORE ALTERATIONS are in progress; and

f. CRD charging water header pressure $\geq$ 940 psig.

APPLICABILITY: MODE 5 with the reactor mode switch in startup/hot standby position.

ACTIONS

CONDITION	REQUIRED ACTION	COMPLETION TIME
----------NOTE---------- Separate Condition entry is allowed for each control rod. ---------- A. One or more control rods not coupled to its associated CRD.	----------NOTE---------- Rod Worth Minimizer may be bypassed as allowed by LCO 3.3.2.1, if required, to allow insertion of inoperable control rod and continued operation. ---------- A.1 Fully insert inoperable control rod. AND A.2 Disarm the associated CRD.	 3 hours 4 hours
B. One or more of the above requirements not met for reasons other than Condition A.	B.1 Place the reactor mode switch in the shutdown or refuel position.	Immediately

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.10.8.1	Perform the MODE 2 applicable SRs for LCO 3.3.1.1, Functions 2.a, 2.d, and 2.f of Table 3.3.1.1-1.	According to the applicable SRs

(continued)

BASES

APPLICABLE SAFETY ANALYSES (continued)

CRDA analyses assume that the reactor operator follows prescribed withdrawal sequences. For SDM tests performed within these defined sequences, the analysis of Reference 1 is applicable. However, for some sequences developed for the SDM testing, the control rod patterns assumed in the safety analysis of Reference 1 may not be met. Therefore, special CRDA analyses, performed in accordance with an NRC approved methodology, are required to demonstrate that the SDM test sequence will not result in unacceptable consequences should a CRDA occur during the testing. For the purpose of this test, the protection provided by the normally required MODE 5 applicable LCOs, in addition to the requirements of this LCO, will maintain normal test operations as well as postulated accidents within the bounds of the appropriate safety analysis (Ref. 1). In addition to the added requirements for the rod worth minimizer (RWM), APRM, and control rod coupling, the single notch withdrawal mode is specified for out of sequence withdrawals. Requiring the single notch withdrawal mode limits withdrawal steps to a single notch, which limits inserted reactivity, and allows adequate monitoring of changes in neutron flux, which may occur during the test.

As described in LCO 3.0.7, compliance with Special Operations LCOs is optional, and therefore, no criteria of Reference 2 apply. Special Operations LCOs provide flexibility to perform certain operations by appropriately modifying requirements of other LCOs. A discussion of the criteria satisfied for the other LCOs is provided in their respective Bases.

LCO

As described in LCO 3.0.7, compliance with this Special Operations LCO is optional. SDM tests may be performed while in MODE 2, in accordance with Table 1.1-1, without meeting this Special Operations LCO or its ACTIONS. For SDM tests performed while in MODE 5, additional requirements must be met to ensure that adequate protection against potential reactivity excursions is available. To provide additional scram protection, beyond the normally required IRMs, the APRMs are also required to be OPERABLE (LCO 3.3.1.1, Functions 2.a, 2.d, and 2.e) as though the reactor were in MODE 2. Because multiple control rods will be withdrawn and the reactor will potentially become critical, the approved control rod withdrawal sequence

(f)

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BASES (continued)

SURVEILLANCE REQUIREMENTS

SR 3.10.8.1, SR 3.10.8.2, and SR 3.10.8.3

LCO 3.3.1.1, Functions 2.a, 2.d, and 2.f, made applicable in this Special Operations LCO, are required to have applicable Surveillances met to establish that this Special Operations LCO is being met (SR 3.10.8.1). However, the control rod withdrawal sequences during the SDM tests may be enforced by the RWM (LCO 3.3.2.1, Function 2, MODE 2 requirements) or by a second licensed operator (Reactor Operator or Senior Reactor Operator) or other qualified member of the technical staff (e.g., a qualified shift technical advisor or reactor engineer). As noted, either the applicable SRs for the RWM (LCO 3.3.2.1) must be satisfied according to the applicable Frequencies (SR 3.10.8.2), or the proper movement of control rods must be verified (SR 3.10.8.3). This latter verification (i.e., SR 3.10.8.3) must be performed during control rod movement to prevent deviations from the specified sequence. These Surveillances provide adequate assurance that the specified test sequence is being followed.

SR 3.10.8.4

Periodic verification of the administrative controls established by this LCO will ensure that the reactor is operated within the bounds of the safety analysis. The 12 hour Frequency is intended to provide appropriate assurance that each operating shift is aware of and verifies compliance with these Special Operations LCO requirements.

SR 3.10.8.5

Coupling verification is performed to ensure the control rod is connected to the control rod drive mechanism and will perform its intended function when necessary. The verification is required to be performed any time a control rod is withdrawn to the "full-out" notch position or prior to declaring the control rod OPERABLE after work on the control rod or CRD System that could affect coupling. This Frequency is acceptable, considering the low probability that a control rod will become uncoupled when it is not being moved as well as operating experience related to uncoupling events.

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