December 7, 2000

Mr. Michael Kansler
Sr. Vice President and Chief
Operating Officer
Entergy Nuclear Operations, Inc.
440 Hamilton Ave.
White Plains, NY 10601

SUBJECT: DRAFT SAFETY EVALUATION REGARDING PROPOSED CONVERSION TO IMPROVED STANDARD TECHNICAL SPECIFICATIONS - INDIAN POINT NUCLEAR GENERATING UNIT NO. 3 (TAC NO. MA4359)

Dear Mr. Kansler:

At Enclosure 1 please find the draft Safety Evaluation (SE) of your proposed conversion of the current technical specifications (CTSs) for the Indian Point Nuclear Generating Unit No. 3 (IP3) to the improved technical specifications (ITSs). In an effort to meet the issuance date of February 28, 2001, the NRC staff completed the draft SE for review even though we have not yet received all responses to our requests for additional information (RAIs). We will continue to work toward the agreed-upon February 28, 2001, issuance date; it is still possible to meet this date assuming that all future submittals conform to verbal resolution of the RAIs.

Please review the enclosed draft SE to verify its accuracy. Please also prepare the certified ITS for IP3 to be submitted to NRC for issuance in the conversion amendment. In accordance with our agreed-upon schedule, please provide both your written comments on the draft SE and a certified ITS and Bases within 30 days of receipt of this letter. After we review your comments, we will incorporate changes, as appropriate, in the final SE before issuing the ITS and the final SE. Our conclusions in the enclosed draft SE are not valid until the final SE is issued.

Within 30 days of receipt of this letter we request that you submit a license condition for Appendix D to the IP3 license to make enforceable the transfer of those requirements in the CTS being relocated into licensee-controlled documents that are the subject of regulations, as described in your letters and the enclosed draft SE. Enclosure 2 contains an acceptable license condition. A similar license condition should also be submitted for (1) each commitment to complete a future action that you have included in your letters on the ITS for IP3, and (2) the first performance of new and revised surveillance requirements (SRs) for the ITS to be related to the implementation of the ITS. An acceptable license condition for the new and revised SRs is provided in Section 5 of the enclosed draft SE and Enclosure 2.

The draft SE, including five tables attached to the SE that list the changes to the CTS, documents the staff's review of your application dated December 11, 1998 (IPN-98-134), as supplemented by letters dated December 15, 1998 (IPN-98-139), and May 17, 1999 (IPN-99-055). Letters dated August 16, 2000 (IPN-00-059), September 14, 2000 (IPN-00-059), September 27, 2000 (IPN-00-71) were your responses to the staff’s RAI dated July 9, 1999.

The additional CTS changes not normally included in a TS conversion amendment (beyond-scope issues) are addressed in Section 3.G.

The staff's review was based on the Standard Technical Specifications (STS), NUREG-1431, Revision 1, "Standard Technical Specifications for Westinghouse Plants," dated April 1995, and on guidance provided in the Commission's "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," published in the Federal Register on July 22, 1993 (58 FR 39132). The enclosed draft safety evaluation was forwarded electronically to Mr. Kevin Kingsley of your staff on December 4, 2000.

Please do not hesitate to contact me at 301-415-1494 if you have any questions.

Sincerely,

/RA/

George F. Wunder, Project Manager, Section I
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-286

Enclosures: 1. Draft Safety Evaluation
2. Acceptable License Condition

cc w/encls: See next page

December 7, 2000

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SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. [ ] TO FACILITY OPERATING LICENSE DPR-64

INDIAN POINT NUCLEAR GENERATING UNIT NO. 3

ENTERGY NUCLEAR OPERATIONS, INC.

DOCKET NO. 50-286

1.0 INTRODUCTION

Indian Point Nuclear Generating Unit No. 3 (IP3) has been operating with Technical Specifications (TS) issued with the full power operating license (DPR-64) on April 5, 1976, as amended. By application dated December 11, 1998 (IPN-98-134), as supplemented by letters dated December 15, 1998 (IPN-98-139), May 17, 1999 (IPN-99-055), August16, 2000 (IPN-00-059), September 14, 2000 (IPN-00-059), September 27, 2000 (IPN-00-71), and November XX, 2000 (IPN-00-YYY)[to be provided], New York Power Authority (NYPA), the licensee, proposed to convert the current Technical Specifications (CTS) to improved Technical Specifications (ITS). The conversion is based upon:

- NUREG-1431, "Standard Technical Specifications for Westinghouse Plants," Revision 1, dated April 1995,
- "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors," (Final Policy Statement), published on July 22, 1993 (58 FR 39132), and
- 10 CFR 50.36, “Technical Specifications,” as amended July 19, 1995 (60 FR 36953).

Hereafter, the proposed or improved TS for IP3 are referred to as the ITS, the existing TS are referred to as the CTS, and the improved standard TS, such as in NUREG-1431 are referred to as the STS. The corresponding TS Bases are ITS Bases, CTS Bases, and STS Bases, respectively. For convenience, a list of acronyms used in this safety evaluation (SE) is provided in Attachment 1.

In addition to basing the ITS on the STS, the Final Policy Statement, and the requirements in 10 CFR 50.36, the licensee retained portions of the CTS as a basis for the ITS. Plant-specific issues, including design features, requirements, and operating practices, were discussed with the licensee during a series of telephone conference calls that concluded on December 8, 1999. These plant-specific changes serve to clarify the ITS with respect to the guidance in the Final Policy Statement and STS. Also, based on these discussions, the licensee proposed matters of a generic nature that were not in STS. The NRC staff requested that the licensee submit such generic issues as proposed changes to STS through the NRC/Nuclear Energy Institute's Technical Specifications Task Force (TSTF). These generic issues were considered for specific applications in the IP3 ITS. Consistent with the Final Policy Statement, the licensee proposed transferring some CTS requirements to licensee-controlled documents (such as the final safety

analysis report (FSAR) for IP3, for which changes to the documents by the licensee are controlled by a regulation such as 10 CFR 50.59 and may be changed without prior NRC approval). NRC-controlled documents, such as the TS, may not be changed by the licensee without prior NRC approval. In addition, human factors principles were emphasized to add clarity to the CTS requirements being retained in the ITS, and to define more clearly the appropriate scope of the ITS. Further, significant changes were proposed to the CTS Bases to make each ITS requirement clearer and easier to understand.

The overall objective of the proposed amendment, consistent with the Final Policy Statement, is to rewrite, reformat, and streamline the TS for IP3 to be in accordance with 10 CFR 50.36.

Since the licensee prepared the December 11, 1998, application, a number of amendments to the IP3 operating license were approved. Table 1 provides the subjects of the amendments and the dates of issuance.

TABLE 1

Amendment No.	Description of Change	Date
185	Instrument SR Intervals Extended to 24 Months	12/16/98
186	SRC Audit Requirements and Management Title Changes	12/30/98
187	DG Testing when a DG is Inoperable	02/05/99
188	Relocation of SRC Review and Audit Requirements	02/25/99
189	Relocation of TS Regarding Movements of Irradiated Fuel	05/24/99
190	One Time Extension of EDG AOT	08/09/99
191	Removal of Footnote on DNB Analysis	09/02/99
192	Turbine Trip Setpoint Below P-8	09/08/99
193	Administrative Changes	09/14/99
194	EDG Requirements in Cold Shutdown	09/14/99
195	Removal of CIV Tables	09/16/99
196	SI Pump AOT	10/12/99
197	Control Rod Alignment	10/14/99
198	EDG Fuel Oil Storage Tanks	12/07/99
199	Generic Letter 89-01 (RETS) and 10 CFR 20 Changes	02/07/00
200	Relocate CVCS Specification	02/07/00
201	Deleted PORC Review of Fire Protection Procedure	03/13/00
202	P/T Limits	10/05/00
203	License Transfer	10/21/00

The licensee has incorporated these amendments, as appropriate, into the ITS.

The NRC staff's evaluation of the application dated December 11, 1998, is presented in this SE. The NRC staff issued requests for additional information (RAIs) dated July 9, 1999.

The license conditions implementing the conversion will make enforceable the following aspects of the conversion: (1) the relocation of requirements from the CTS and (2) the implementation schedule for new and revised SRs in the ITS.

The Commission's proposed action on the IP3 application for an amendment dated [ ], was published in the *Federal Register* on [ ] ([ ]). The *Federal Register* notices also addressed beyond-scope issues identified in the licensee's supplemental submittals.

During its review, the NRC staff relied on the Final Policy Statement and the STS as guidance for acceptance of CTS changes. This SE provides a summary basis for the NRC staff's conclusion that the licensee can develop ITS based on STS, as modified by plant-specific changes, and that the use of the ITS is acceptable for continued operation. The SE also explains the NRC staff's conclusion that the ITS, which are based on the STS as modified by plant-specific changes, are consistent with the IP3 current licensing basis and the requirements of 10 CFR 50.36.

The NRC staff also acknowledges that, as indicated in the Final Policy Statement, the conversion to STS is a voluntary process. Therefore, it is acceptable that the ITS differ from the STS, to reflect the current licensing basis for IP3. The NRC staff approves the licensee's changes to the CTS with modifications documented in the licensee's supplemental submittals.

For the reasons stated *infra* in this SE, the NRC staff finds that the ITS issued with this license amendment comply with Section 182a of the Atomic Energy Act, 10 CFR 50.36, and the guidance in the Final Policy Statement, and that they are in accord with the common defense and security and provide adequate protection of the health and safety of the public.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act requires that applicants for nuclear power plant operating licenses will state:

> [S]uch technical specifications, including information of the amount, kind, and source of special nuclear material required, the place of the use, the specific characteristics of the facility, and such other information as the Commission may, by rule or regulation, deem necessary in order to enable it to find that the utilization . . . of special nuclear material will be in accord with the common defense and security and will provide adequate protection to the health and safety of the public. Such technical specifications shall be a part of any license issued.

In 10 CFR 50.36, the Commission established its regulatory requirements related to the content of TS. In doing so, the Commission placed emphasis on those matters related to the prevention of accidents and the mitigation of accident consequences; the Commission noted that applicants were expected to incorporate into their TS "those items that are directly related

to maintaining the integrity of the physical barriers designed to contain radioactivity." Statement of Consideration, "Technical Specifications for Facility Licenses; Safety Analysis Reports," (33 FR 18610, December 17, 1968). Pursuant to 10 CFR 50.36, TS are required to include items in the following five specific categories related to station operation: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) SRs; (4) design features; and (5) administrative controls. However, the rule does not specify the particular requirements to be included in a plant's TS.

For several years, NRC and industry representatives have sought to develop guidelines for improving the content and quality of nuclear power plant TS. On February 6, 1987, the Commission issued an interim policy statement on TS improvements, "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788). During the period from 1989 to 1992, the utility owners groups and the NRC staff developed improved STS, such as NUREG-1431, that would establish models of the Commission's policy for each primary reactor type. In addition, the NRC staff, licensees, and owners groups developed generic administrative and editorial guidelines in the form of a "Writer's Guide" for preparing TS, which gives greater consideration to human factors principles and was used throughout the development of licensee-specific ITS.

In September 1992, the Commission issued NUREG-1431, which was developed using the guidance and criteria contained in the Commission's Interim Policy Statement. The STS in NUREG-1431 was established as a model for developing the ITS for Westinghouse plants in general. The STS reflect the results of a detailed review of the application of the interim policy statement criteria to generic system functions, which were published in a "Split Report" issued to the nuclear steam system supplier owners groups in May 1988. STS also reflect the results of extensive discussions concerning various drafts of STS, so that the application of the TS criteria and the Writer's Guide would consistently reflect detailed system configurations and operating characteristics for all reactor designs. As such, the generic Bases presented in NUREG-1431 provides an abundance of information regarding the extent to which the STS present requirements that are necessary to protect public health and safety. The STS in NUREG-1431 applies to IP3.

On July 22, 1993, the Commission issued its Final Policy Statement, expressing the view that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36 (58 FR 39132). The Final Policy Statement described the safety benefits of the STS, and encouraged licensees to use the STS as the basis for plant-specific TS amendments, and for complete conversions to ITS based on the STS. Further, the Final Policy Statement gave guidance for evaluating the required scope of the TS and defined the guidance criteria to be used in determining which of the LCOs and associated SRs should remain in the TS. The Commission noted that, in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the TS, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Appeal Board in *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). There, the Appeal Board observed:

> [T]here is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a technical specification, to be included in the license as an absolute condition of operation which is legally binding upon the licensee unless and until changed

> with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is that technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

By this approach, existing LCO requirements that fall within or satisfy any of the criteria in the Final Policy Statement should be retained in the TS; those LCO requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents. The Commission codified the four criteria in 10 CFR 50.36 (60 FR 36953, July 19, 1995). The four criteria are as follows:

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.

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.

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.

Criterion 4

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

Part 3.0 of this SE explains the NRC staff's conclusion that the conversion of the IP3 CTS to ITS based on STS, as modified by plant-specific changes, is consistent with the IP3 current licensing basis and the requirements and guidance of the Final Policy Statement and 10 CFR 50.36.

3.0 EVALUATION

The NRC staff's ITS review evaluates changes to CTS that fall into five categories defined by the licensee and includes an evaluation of whether existing regulatory requirements are adequate for controlling future changes to requirements removed from the CTS and placed in licensee-controlled documents.

The NRC staff review also identified the need for clarifications and additions to the December 11, 1998, application in order to establish an appropriate regulatory basis for translation of CTS requirements into ITS. Each change proposed in the amendment request is identified as either a discussion of change (DOC) to the CTS or a justification for difference from the STS. The NRC staff's comments were documented as RAIs and forwarded in a letters dated July 9, 1999. The licensee provided responses to the RAIs in letters dated August16, 2000 (IPN-00-059), September 14, 2000 (IPN-00-059), September 27, 2000 (IPN-00-71), and November XX, 2000 (IPN-00-YYY)[to be provided]. The letters clarified the licensee's bases for translating the CTS requirements into ITS. The NRC staff finds that the licensee's submittals, including the responses to the RAIs, provide sufficient detail to allow the staff to reach a conclusion regarding the adequacy of the licensee's proposed changes to the CTS.

The license amendment application was organized such that changes were included in each of the following CTS change categories, as appropriate:

1. Administrative Changes, (Designator: A.n) are changes to the CTS that do not result in new requirements or change operational restrictions or flexibility (i.e., nontechnical changes in the presentation of CTS requirements);

2. More Restrictive Changes, (Designator: M.n) are changes to the CTS that establish a new requirement, require new or more frequent testing, or reduce operational flexibility (i.e., additional TS requirements);

3. Less Restrictive Changes, (Designator: L.n) are changes to the CTS that eliminate existing requirements, require less or less frequent testing, or increase operational flexibility (i.e., changes, deletions, and relaxations of CTS requirements);

4. Less Restrictive Administrative Changes, (Designator: LA.n) are changes to the CTS that relocate details out of the CTS and into the Bases, FSAR, or other appropriate licensee-controlled document (i.e., design details, system descriptive details, and procedural details);

5. Relocated Technical Specifications, (Designator: R.n) are relaxations in which whole CTS specifications (the LCO, and associated actions and SRs) are removed from the CTS (an NRC-controlled document) and placed in licensee-controlled documents.

The changes to the CTS that are in the ITS conversion for IP3 for each of the above categories are listed in the following five tables attached to this SE:

- Table A of Administrative Changes to the CTS
- Table M of More Restrictive Changes to the CTS
- Table L of Less Restrictive Changes to the CTS
- Table LA of Removed Details and Less Restrictive Administrative Changes to the CTS
- Table R of Relocated Specifications to the CTS

These tables provide a summary description of the proposed changes to the CTS, the specific CTS that are being changed, and the specific ITS that incorporate the changes. The tables are

only meant to summarize the changes being made to the CTS. The details, as to what the actual changes are and how they are being made to the CTS or ITS, are provided in the licensee's application and supplemental letters.

The general categories of changes to the licensee's CTS requirements listed in Tables A, M, L, LA and R, are described in A through E below. The control of specifications, requirements and information relocated from the CTS is described in F below, and other TS changes (i.e., beyond scope changes) are described in G below.

A. Administrative Changes to the CTS

Administrative (nontechnical) changes are intended to incorporate human factors principles into the form and structure of the ITS so that plant operations personnel can use them more easily. These changes are editorial in nature or involve the reorganization or reformatting of CTS requirements without affecting technical content or operational restrictions. Every section of the ITS reflects this type of change. In order to ensure consistency, the NRC staff and the licensee have used the STS as guidance to reformat and make other administrative changes. Among the changes proposed by the licensee and found acceptable by the NRC staff are:

1. Identifying plant-specific wording for system names, etc.;

2. Splitting up requirements currently grouped under a single current specification to more appropriate locations in two or more specifications of ITS;

3. Combining related requirements currently presented in separate specifications of the CTS into a single specification of ITS;

4. Presentation changes that involve rewording or reformatting for clarity (including moving an existing requirement to another location within the TS) but which do not involve a change in requirements;

5. Wording changes and additions that are consistent with CTS interpretation and practice, and that more clearly or explicitly state existing requirements;

6. Deletion of TS whose applicability has expired; and

7. Deletion of redundant TS requirements that exist elsewhere in the TS.

Table A lists the administrative changes being made in the IP3 ITS conversion. Table A is organized in ITS order by each A-type DOC to the CTS, and provides a summary description of the administrative change that was made, and CTS and ITS references. The NRC staff reviewed all of the administrative and editorial changes proposed by the licensee and finds them acceptable because they are compatible with the Writer's Guide and STS, do not result in any change in operating requirements, and are consistent with the Commission's regulations.

B. More Restrictive Changes to the CTS

The licensee, in electing to implement the specifications of the STS, proposed a number of requirements more restrictive than those in the CTS. The ITS requirements in this category include requirements that are either new, more conservative than corresponding requirements in the CTS, or that have additional restrictions that are not in the CTS but are in the STS. Examples of more restrictive requirements are placing an LCO on plant equipment which is not required by the CTS to be operable, more restrictive requirements to restore inoperable equipment, and more restrictive SRs. Table M lists the more restrictive changes being made in the IP3 ITS conversion. Table M is organized in ITS order by each M-type DOC to the CTS and provides a summary description of the more restrictive change that was adopted, and the CTS and ITS references. These changes are additional restrictions on plant operation that enhance safety and are acceptable.

C. Less Restrictive Changes to the CTS

Less restrictive requirements include deletions and relaxations to portions of the CTS requirements that are being retained in ITS. When requirements have been shown to give little or no safety benefit, their relaxation or removal from the TS may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of: (1) generic NRC actions, (2) new NRC staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the owners groups comments on the STS. The NRC staff reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The IP3 design was also reviewed to determine if the specific design basis and licensing basis for IP3 are consistent with the technical basis for the model requirements in the STS, and thus provide a basis for the ITS.

All of the less restrictive changes to the CTS have been evaluated and found to involve deletions and relaxations to portions of the CTS requirements that can grouped in the following six categories:

(1) Relaxation of Modes of Applicability (Category I)

(2) Relaxation of Surveillance Requirement (Category II)

(3) Relaxation of Completion Time (Category III)

(4) Relaxation of Required Actions (Category IV)

(5) Relaxation of LCO (Category V)

(6) Relaxation of CTS Reporting Requirements (Category VI)

The following discussions address why portions of various specifications within each of these ten categories of information or specific requirements are not required to be included in ITS.

(1) Relaxation of Modes of Applicability (Category I)

Reactor operating conditions are used in CTS to define when the LCO features are required to be operable. CTS applicabilities can be specific defined terms of reactor conditions: hot shutdown, cold shutdown, reactor critical or power operating condition. Applicabilities can also be more general. Depending on the circumstances, CTS may require that the LCO be maintained within limits in "all modes" or "any operating mode." Generalized applicability conditions are not contained in STS, therefore ITS eliminate CTS requirements such as "all modes" or "any operating mode," replacing them with ITS defined modes or applicable conditions that are consistent with the application of the plant safety analysis assumptions for operability of the required features.

In another application of this type of change, CTS requirements may be eliminated during conditions for which the safety function of the specified safety system is met because the feature is performing its intended safety function. Deleting applicability requirements that are indeterminant or which are inconsistent with application of accident analyses assumptions is acceptable because when LCOs cannot be met, the TS are satisfied by exiting the applicability thus taking the plant out of the conditions that require the safety system to be operable. These changes are consistent with STS and changes specified as Category I are acceptable.

(2) Relaxation of Surveillance Requirement (Category II)

Prior to placing the plant in a specified operational mode or other condition stated in the Applicability of an LCO, and in accordance with the specified SR Frequency thereafter, the CTS require verifying the Operability of each LCO-required component by meeting the SRs associated with the LCO. This usually entails performance of testing to demonstrate the Operability of the LCO-required components, or the verification that specified parameters are within LCO limits. A successful demonstration of Operability requires meeting the specified acceptance criteria as well as any specified conditions for the conduct of the test. Relaxations of CTS SRs include relaxing both the acceptance criteria and the conditions of performance. These CTS SR relaxations are consistent with STS.

Relaxations of CTS SR acceptance criteria provide operational flexibility, consistent with the guidance of the STS, but do not reduce the level of assurance of Operability provided by the successful performance of the surveillance. Such revised acceptance criteria are acceptable because they remain consistent with the application of the plant safety analysis assumptions for Operability of the LCO-required features.

Relaxations of CTS SR performance conditions include not requiring testing of deenergized equipment (e.g., instrumentation Channel Checks) and equipment that is already performing its intended safety function (e.g., position verification of valves locked in their safety actuation position). These changes are acceptable because the existing surveillances are not necessary to ensure the capability of the affected components to perform their intended functions. Another relaxation of SR performance conditions is the allowance to verify the position of valves in high radiation areas by administrative means. This change is acceptable because the TS administrative controls (ITS 5.7) regarding access to high radiation areas make the likelihood of mispositioning such valves negligible.

Finally, the ITS permits the use of an actual as well as a simulated actuation signal to satisfy SRs for automatically actuated systems. This is acceptable because TS required features cannot distinguish between an "actual" signal and a "test" signal.

These relaxations of CTS SRs optimize test requirements for the affected safety systems and increase operational flexibility. Therefore, because of the reasons stated, less restrictive changes falling within Category II are acceptable.

(3) Relaxation of Completion Time (Category III)

Upon discovery of a failure to meet an LCO, STS specify times for completing required Actions of the associated TS conditions. Required Actions of the associated conditions are used to establish remedial measures that must be taken within specified completion times (allowed outage times). These times define limits during which operation in a degraded condition is permitted.

Adopting completion times from the STS is acceptable because completion times take into account the operability status of the redundant systems of TS required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, and the low probability of a design basis accident (DBA) occurring during the repair period. These changes are consistent with STS, and allowed outage time extensions specified as Category III are acceptable.

(4) Relaxation of Required Actions (Category IV)

CTS require that in the event specified LCOs are not met, penalty factors to reactor operation, such as resetting setpoints, and power reductions shall be initiated as the method to reestablish the appropriate limits. The ITS are constructed to specify actions for conditions of required features made inoperable. Adopting ITS action requirements for exiting LCO applicabilities is acceptable because the plant remains within analyzed parameters by performance of required actions, or the actions are constructed to minimize risks associated with continued operation while providing time to repair inoperable features. Such actions add margin to safety or verify equipment status such as interlock status for the mode of operation, thereby providing assurance that the plant is configured appropriately or operations that could result in a challenge to safety systems are exited in a time period that is commensurate with the safety importance of the system. Additionally, other changes to TS actions include placing the reactor in a mode where the specification no longer applies, usually resulting in an extension to the time period for taking the plant into shutdown conditions. These actions are commensurate with industry standards for reductions in thermal power in an orderly fashion without compromising safe operation of the plant. These changes are consistent with STS and changes specified as Category IV are acceptable.

(5) Relaxation of LCO (Category V)

CTS contain LCOs that are overly restrictive because they specify limits on operational and system parameters and on system Operability beyond those necessary to meet safety analysis assumptions. CTS also contain administrative controls that do not contribute to the safe operation of the plant. The ITS, consistent with the guidance in

the STS, omit such operational limits and administrative controls. This category of change includes (1) deletion of equipment or systems addressed by the CTS LCOs which are not required or assumed to function by the applicable safety analyses; (2) addition of explicit exceptions to the CTS LCO requirements, consistent with the guidance of the STS and normal plant operations, to provide necessary operational flexibility but without a significant safety impact; and (3) deletion of miscellaneous administrative controls such as reporting requirements—sometimes contained in action requirements—that have no affect on safety. Deletion of such administrative controls allows operators to more clearly focus on issues important to safety. The ITS LCOs and administrative controls resulting from these changes will continue to maintain an adequate degree of protection consistent with the safety analysis while providing an improved focus on issues important to safety and necessary operational flexibility without adversely affecting the safe operation of the plant. Therefore, less restrictive changes falling within Category V are acceptable.

(6) Relaxation of CTS Reporting Requirements (Category VI)

CTS include requirements to submit Special Reports when specified limits are not met. Typically, the time period for the report to be issued is within 30 days. However, the STS eliminates the TS administrative control requirements for Special Reports and instead relies on the reporting requirements of 10 CFR 50.73. ITS changes to reporting requirements are acceptable because 10 CFR 50.73 provides adequate reporting requirements, and the special reports do not affect continued plant operation. Therefore, this change has no impact on the safe operation of the plant. Additionally, deletion of TS reporting requirements reduces the administrative burden on the plant and allows efforts to be concentrated on restoring TS required limits. These changes are consistent with STS and changes specified as Category VI are acceptable.

D. Removed Details and Less Restrictive Administrative Changes to the CTS

When requirements have been shown to give little or no safety benefit, their removal from the TS may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups comments on STS. The NRC staff reviewed generic relaxations contained in STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in STS, and thus provide a basis for ITS. Changes to the CTS that involve the removal of specifications, specific requirements and detailed information from individual specifications were all evaluated and grouped within the following Types 1 through 4:

Type 1 Details of System Design and System Description Including Design Limits

Type 2 Descriptions of System or Plant Operation

Type 3 Procedural Details for Meeting TS Requirements and Related Reporting Requirements

Type 4 Relocated Redundant Requirements

The following discussions address why each of the four types of information or specific requirements are not required to be included in ITS .

Details of System Design and System Description Including Design Limits *(Type 1)*

The design of the facility is required to be described in the FSAR by 10 CFR 50.34. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 require that plant design be documented in controlled procedures and drawings, and maintained in accordance with an NRC-approved QA Program (FSAR Chapter 17). In 10 CFR 50.59, controls are specified for changing the facility as described in the FSAR which includes the new Technical Requirements Manual (TRM) by reference, and in 10 CFR 50.54(a) criteria are specified for changing the QA Program. In the ITS, the Bases also contain descriptions of system design. The IP3 administrative controls specification ITS 5.5.10 specifies controls for changing the Bases. Removing details of system design from the CTS is acceptable because this information will be adequately controlled by NRC requirements, the FSAR, controlled design documents and drawings, or the TS Bases, as appropriate. Cycle-specific design limits are moved from the CTS to the Core Operating Limits Report (COLR) in accordance with Generic Letter 88-16. ITS Administrative Controls are revised to include the programmatic requirements for controlling the COLR.

Descriptions of System or Plant Operation *(Type 2)*

The plans for the normal and emergency operation of the facility are required to be described in the FSAR by 10 CFR 50.34. ITS 5.4.1.a requires written procedures to be established, implemented, and maintained for plant operating procedures including procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. Controls specified in 10 CFR 50.59 apply to changes in procedures as described in the FSAR. In the ITS, the Bases also contain descriptions of system operation. CTS provides lists of acceptable devices that may be used to satisfy LCO requirements. The ITS reflect the STS approach to provide LCO requirements that specify the protective limit that is required to meet safety analysis assumptions for required features. The protective limits replace the lists of specific devices previously found to be acceptable to the NRC staff for meeting the LCO. The ITS changes provide the same degree of protection required by the safety analysis and provide flexibility for meeting limits without adversely affecting operations since equivalent features are required to be operable. It is acceptable to remove details of system operation from the TS because this type of information will be adequately controlled in the FSAR, plant operating procedures, and the TS Bases, as appropriate.

Procedural Details for Meeting TS Requirements & Related Reporting Requirements *(Type 3)*

Details for performing action and surveillance requirements are more appropriately specified in the plant procedures required by ITS 5.4.1, the FSAR, and the ITS Bases. For example, control of the plant conditions appropriate to perform a surveillance test is an issue for procedures and scheduling and has previously been determined to be unnecessary as a TS restriction. As indicated in Generic Letter 91-04, allowing this

procedural control is consistent with the vast majority of other SRs that do not dictate plant conditions for surveillances. Prescriptive procedural information in an action requirement is unlikely to contain all procedural considerations necessary for the plant operators to complete the actions required, and referral to plant procedures is therefore required in any event. Other changes to procedural details include those associated with limits retained in the ITS. For example, the ITS requirement may refer to programmatic requirements such as COLR, included in ITS Section 5.5, which specifies the scope of the limits contained in the COLR and mandates NRC approval of the analytical methodology. The QA Program is approved by the NRC and contained in FSAR Chapter 17, and changes to the QA Program are controlled by 10 CFR 50.54(a). The Offsite Dose Calculation Manual (ODCM) is required by ITS section 5.5.1. The TRM is incorporated by reference into the FSAR, and changes to the TRM are controlled by 10 CFR 50.59. The Inservice Test (IST) program is required by ITS 5.5.6 and is controlled by ITS 5.4.1.e.

The removal of these kinds of procedural details from the CTS is acceptable because they will be adequately controlled by NRC requirements, the FSAR, plant procedures, Bases and COLR, as appropriate. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. Similarly, removal of reporting requirements from LCOs is appropriate because ITS 5.6, 10 CFR 50.36 and 10 CFR 50.73 adequately cover the reports deemed to be necessary.

Relocated Redundant Requirements *(Type 4)*

Certain CTS administrative requirements are redundant to regulations and thus are relocated to the FSAR or other appropriate licensee-controlled documents. The Final Policy Statement allows licensees to relocate to licensee-controlled documents CTS requirements that do not meet any of the criteria for mandatory inclusion in the TS. Changes to the facility or to procedures as described in the FSAR are made in accordance with 10 CFR 50.59. Changes made in accordance with the provisions of other licensee-controlled documents are subject to the specific requirements of those documents. For example, 10 CFR 50.54(a) governs changes to the QA plan, and ITS 5.5.13 governs changes to the ITS Bases. Therefore, relocation of the administrative details identified above, is acceptable.

CTS requirements that are not required to be in TS and that are or can be adequately controlled by other regulatory or TS requirements, can be relocated to licensee controlled documents. Table LA lists the requirements and detailed information in the CTS that are being moved to licensee-controlled documents and not retained in the ITS. Table LA is organized in ITS order by each LA. It includes the following: (1) the ITS section or specification designation, as appropriate, followed by the DOC identifier (e.g., 3.1.1 followed by LA.1 means ITS Specification 3.1.1, DOC LA.1); (2) CTS reference; (3) a summary description of the relocated details; (4) the name of the document to contain the relocated details or requirements (new location); (5) the regulation (or ITS section) for controlling future changes to relocated requirements (control process); and (6) a characterization of the type of change.

The NRC staff has concluded that these types of detailed information and specific requirements do not need to be included in the ITS to ensure the effectiveness of ITS to adequately protect

the health and safety of the public. Accordingly, these requirements may be moved to one of the following licensee-controlled documents for which changes are adequately governed by a regulatory or TS requirement:

- TS Bases controlled in accordance with ITS 5.5.13, "Technical Specifications (TS) Bases Control Program."
- FSAR (which includes the TRM) controlled by 10 CFR 50.59.
- Programmatic documents required by ITS Section 5.5 controlled by ITS Section 5.4
- Inservice Inspection (ISI) and Inservice Testing Programs controlled by 10 CFR 50.55a
- Offsite Dose Calculation Manual controlled by ITS 5.5.1.
- Core Operating Limits Report controlled by ITS 5.6.5.
- QA plan, as approved by the NRC and referenced in the FSAR, controlled by 10 CFR Part 50, Appendix B, and 10 CFR 50.54(a).
- Site Emergency Plan controlled by 10 CFR 50.54(q).

To the extent that information has been relocated to licensee-controlled documents, such information is not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to public health and safety. Further, where such information is contained in LCOs and associated requirements in the CTS, the NRC staff has concluded that they do not fall within any of the four criteria contained in 10 CFR 50.36 and discussed in the Final Policy Statement (see Section 2.0 of this SE). Accordingly, existing detailed information, such as generally described above, may be removed from the CTS and not included in the ITS.

E. Relocated Specifications from the CTS

The Final Policy Statement states that LCOs and associated requirements that do not satisfy or fall within any of the four specified criteria (now contained in 10 CFR 50.36) may be relocated from existing TS (an NRC-controlled document) to appropriate licensee-controlled documents. This section of the SE discusses the relocation of entire specifications in the CTS to licensee-controlled documents. These specifications include the LCOs, Action Statements (i.e., Actions), and associated SRs. In its application and its supplements, the licensee proposed relocating such specifications from the CTS to the FSAR, which includes the TRM, the Process Control Program (PCP), and the ODCM, as appropriate. The staff has reviewed the licensee's submittals, and finds that relocation of these requirements to the FSAR, TRM, PCP, and ODCM is acceptable in that changes to the FSAR, TRM, PCP, and ODCM will be adequately controlled by 10 CFR 50.59, 10 CFR 50.54(a), 10 CFR 50.55a, and ITS 5.5.1 as applicable. These provisions will continue to be implemented by appropriate station procedures (i.e., operating procedures, maintenance procedures, surveillance and testing procedures, and work control procedures).

Table R lists all specifications that are being relocated from the CTS to licensee-controlled documents. Table R is organized by each R-type DOC to the CTS. Table R includes: (1) reference to the DOC, (2) name of relocated CTS, (3) reference to the relocated CTS sections, and (4) names of the documents that will contain the relocated requirements (i.e., the new location).

The NRC staff's evaluation of each relocated specification listed in Table R is provided below, mostly in CTS order.

(1) CTS 3.1.A.7 Table 4.1-3, Item 16, Reactor Vessel Head Vents, (DOC R.1)
CTS 3.1.A.7 Table 4.1-3, Item 16, "Reactor Vessel Head Vents," ensures the availability of an exhaust pathway from the RCS to remove noncondensable gases that could inhibit natural circulation core cooling to improve the plant's capability to cope with severe accidents beyond the DBA. The Reactor Vessel Head Vents function, capabilities, and testing requirements are consistent with the requirements of Item II.B.l of NUREG-0737, "Clarification of TMI Action Plan Requirements." However, the operation of RCS Vents is not assumed in any safety analysis. This is because the operation of the vents is not part of the primary success path. The system is normally isolated and requires manual operator action to initiate flow. The operation of the Reactor Vessel Head Vents is required only when there indication that natural circulation is not occuring in the reactor vessel, inhibiting heat transfer. The Reactor Vessel Head Vents CTS requirements do not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS, and consequently will be relocated to the TRM.

(2) CTS 3.B.3, Steam Generator Secondary Side Minimum Temperature For Pressurization, (DOC R.2)
The limitation on steam generator pressures and temperature (i.e., P/T) ensures that pressure-induced stresses on the steam generators do not exceed the maximum allowable fracture toughness limits. These pressure and temperature limits are based on maintaining steam generator RT_{NDT} sufficient to prevent brittle fracture. As such, the TS places limits on variables consistent with structural analysis results. 10 CFR Part 50, Appendix G provides P/T limits for the reactor coolant pressure boundary (RCPB), and TS requirements for SG tube surveillances ensure the integrity of the boundary between the reactor coolant system and the SG boundary. In addition, 10 CFR 50.55a provides requirements for inservice inspection, including the SG. The steam generator pressure/temperature limitation is not an operating restriction that is an initial condition of a DBA or transient. Therefore, the requirements specified in the existing TS do not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and have been relocated to the FSAR, and will be controlled in accordance with 10 CFR 50.59 and 10 CFR 50.55a.

(3) CTS 3.1.B.4, Pressurizer Heat up and Cooldown, (DOC R.3)
Limits are placed on pressurizer operation to prevent a non-ductile failure. Although the pressurizer operates at temperature ranges above those for which there is reason for concern about brittle fracture, operating limits are provided to assure compatibility of operation with the fatigue analysis performed in accordance with the ASME Boiler and Pressure Vessel Code, Section III, 1965 Edition and associated Code Addenda through the Summer 1966 Addendum. Thus temperature limits (heatup and cooldown rates and auxiliary spray temperature differential) of CTS 3.1.B.4 are placed on the pressurizer to assure compatibility of operation with the fatigue analysis performed in accordance with the ASME Code requirements. However, a failure of pressurizer integrity would result in an analyzed accident (loss of coolant accident) for which adequate mitigation systems and components are provided. These systems will continue to be required by specifications being retained in the improved TS. Therefore, the pressurizer temperature limits are not relied on to prevent or to mitigate a DBA or transient. The requirements specified in CTS 3.1.B.4 do not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and have been relocated to the TRM.

(4) CTS 3.1.E, Maximum Reactor Coolant Oxygen, Chloride and Fluoride Concentration, (DOC R.4)

The reactor coolant water chemistry program provides limits on particular chemical properties of the primary coolant, and surveillance practices to monitor those properties, to ensure that degradation of the reactor coolant pressure boundary is not exacerbated by poor chemistry conditions. However, degradation of the reactor coolant pressure boundary is a long-term process, and there are other more direct means to monitor and correct the degradation of the reactor pressure boundary which are controlled by regulations and TS; for example, in-service inspection conducted in accordance with 10 CFR 50.55a, and primary coolant leakage limits. The chemistry monitoring activity is of a long term preventative purpose rather than mitigative. The requirements specified in CTS 3.1.E do not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and have been relocated to the TRM.

(5) CTS 3.4.D, Steam and Power Conversion System (Turbine Generator), (DOC R.7)

The limitations placed on turbine-generator electrical output due to conditions of turbine overspeed setpoint, number of operable steam dump lines, and condenser back pressure are established to assure that turbine overspeed (during conditions of loss of plant load) will be within the design overspeed value considered in the turbine missile analysis. The purpose of CTS 3.4.D is to provide equipment, turbine generator, protection. The steam and power conversion system (turbine generator) limits are not relied on to prevent or to mitigate a DBA or transient. The requirements specified in CTS 3.4.D do not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and have been relocated to the TRM.

(6) Area Radiation Monitoring and Plant Effluent Radioiodine/Particulate Sampling: (CTS 3.8.A.3, Area Raditiation Monitoring during fuel handling; CTS 3.8.C.1, Area Raditiation Monitoring during fuel handling; CTS Table 3.5-4, Items 5 and 7 and note 3; CTS Table 4.1-1, Items 15.d and 34) (DOC R.8)

All gaseous and particulate effluent from accident releases of radioactivity external to the reactor containment (e.g., the spent fuel pit and waste handling equipment) will be exhausted from the plant vent. Various Air particulate monitors are provided to detect air particulate gamma radioactivity discharges through the plant vent to the atmosphere. The purpose of the Radioactive Gaseous Effluent Instrumentation is to monitor and control radioactive releases. This instrumentation provides a surveillance of release points and initiates automatic alarm/trip functions to terminate the release prior to exceeding the limits of 10 CFR 20. The alarm/trip functions are set in accordance with the ODCM. Requirements to monitor the containment and spent fuel storage areas using either installed or portable instrumentation are not assumed in the analysis of any event. Therefore, these CTS requirements do not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and have been relocated to the ODCM and FSAR.

(7) CTS 3.7.E, Auxiliary Electrical Systems (A.C. Circuits Inside Containment), (DOC R.9)

This specification provides a fuse and a locked open circuit breaker on the electrical feeder to emergency lighting panel 318 inside containment to mitigate any potential effects on ECCS, containment isolation and other safety-related functions if the circuit becomes submerged following a LOCA. The circuits covered by this specification are provided for equipment that is not used during normal plant operation or for accident mitigation. Neither the circuit nor the equipment powered by the circuit have any safety function. The CTS 3.7.E requirements do not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and have been relocated to the TRM.

(8) CTS 3.8.A, Refueling, Fuel Handling and Storage (Communications), (DOC R.10)
Communication between the control room personnel and personnel performing Core Alterations is maintained to ensure that personnel can be promptly informed of significant changes in the plant status or core reactivity condition during refueling. The communications allow for coordination of activities that require interaction between the control room and containment personnel. However, the refueling system design accident or transient response does not take credit for communications. The CTS 3.8.A requirements do not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and have been relocated to the FSAR.

(9) CTS 3.8.A, Refueling, Fuel Handling and Storage (Decay Time), (DOC R.11)
CTS 3.8.A provides the minimum time requirement for reactor subcriticality prior to movement of irradiated fuel assemblies in the reactor vessel. This requirement ensures that sufficient time has elapsed before moving fuel to allow radioactive decay of the short lived fission products, to meet assumptions for the source term in the dose analysis for a fuel handling accident as stated in FSAR 14.2. The operations required prior to moving irradiated fuel in the reactor vessel (e.g., RCS cooldown, depressurization, boration, containment entry, removal of vessel head, removal of vessel internals) require well in excess of 24 hours to complete before irradiated fuel can be moved. Although this Specification satisfied an initial condition for a fuel handling accident and fuel pool cooling limitations, the activities necessary prior to commencing movement of irradiated fuel normally provide a significant delay before the movement of irradiated fuel. Administrative controls have been demonstrated to be very effective in ensuring these requirements are met. Therefore, this Specification has been relocated to the FSAR.

(10) CTS 3.8.A & CTS 3.8.C, Refueling (Manipulator Cranes and Spent Fuel Casks), (DOC R.12)
CTS 3.8.A and CTS 3.8.C provide loading restrictions for the refueling machines corresponding to assumptions in the analysis for fuel handling accidents and dropping heavy loads in the spent fuel pool. These loading restrictions are consistent with the design capabilities of the associated cranes. However, the bounding accident analyses demonstrate acceptable radiological consequences even if the fuel bundles or heavy loads are dropped, based on the secondary containment capability and filtration capacity of the safety-related ventilation systems. Consequently, the loading restrictions and procedures for the refueling machines do not constitute a primary success path to prevent or mitigate fuel handling accidents and therefore, do not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and have been relocated to the FSAR.

(11) CTS 3.9, Radioactive Materials Management, (DOC R.14)
The limitations on sealed source contamination are intended to ensure that the total body and individual organ irradiation doses do not exceed allowable limits in the event of ingestion or inhalation. This is done by imposing a maximum limit for removable contamination on each sealed source. This requirement and the associated surveillance requirements do not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and have been relocated to the FSAR.

(12) CTS 3.11, Movable Incore Instrumentation,(DOC R.15)
CTS 3.11 provides the operability requirements for the Movable Incore Detector Instrumentation when required to monitor the flux distribution within the core. The System is used for periodic surveillance of the power distribution, and calibration of the excore detectors. No automatic actions result from the incore detector system. The incore detector instrumentation does not provide an indication of a degradation of the reactor coolant pressure boundary or an indication

of a challenge to the integrity of a fission product boundary, nor does it mitigate the consequences of a DBA, and therefore it does not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and has been relocated to the FSAR.

(13) CTS 3.12, River Level (Flooding Protection), (DOC R,16)
Analyses have been performed which indicate that the river water elevation does not normally affect reactor operation, and is not an initial condition assumption for a DBA or transient. In the unusual circumstance that river water level rises excessively, there is ample time to place the reactor in a safe condition. River water elevation does not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and has been relocated to the TRM.

(14) CTS 3.13 and CTS 4.11, Safety-related Shock Suppressors (Snubbers), (DOC R.17)
Snubbers are required to prevent unrestrained pipe motion under dynamic loads as might occur during an earthquake or severe transient, while allowing normal thermal motion. Snubbers are passive devices used for supporting piping systems, and the associated TS action statement requires that an inoperable snubber be replaced or repaired within 72 hours, and an engineering evaluation shall be conducted of the operability of the supported system. The consequences of an inoperable snubber can be an increase in the probability of structural damage to piping in the event of dynamic or thermal loads. The surveillance requirement for snubbers is that they be periodically examined under the inservice inspection program. The existing requirements that all snubbers be operable are requirements that do not identify a parameter that is an initial condition assumption for a DBA or transient, do not identify a significant abnormal degradation of the reactor coolant pressure boundary, and do not form part of the primary success path which functions or actuates to mitigate a design basis accident or transient. Snubber requirements, therefore, do not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and have been relocated to the TRM. Further, the relocation of the lists of snubbers is consistent with GL 84-13.

(15) CTS 3.3.H, Toxic Gas Monitoring, (DOC R.18)
Toxic gas detection systems ensure that sufficient capability is available to promptly detect an accidental release of toxic material. These alarms allow operators to initiate protective action to isolate the control room. NRC requirements regarding the relationship of the toxic gas detection systems to the general design criteria (GDC) appear in NUREG-0800, "Standard Review Plan"; Regulatory Guide (RG) 1.78, "Assumptions for Evaluating the Habitability of a Nuclear Power Plant Control Room During a Postulated hazardous Chemical Release"; and RG 1.95, "Protection of Nuclear Power Plant Control Room Operators Against an Accidental Chlorine Release." Generic Letter 95-10, “Relocation of Selected Technical Specifications Requirements Related to Instrumentation,” provides justification for relocating requirements for toxic gas monitoring out of the Technical Specifications. Toxic gas detection systems do not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and have been relocated to the TRM.

(16) CTS 4.3.b, Reactor Coolant System Integrity Testing, (DOC R.19)
The inspection and repair programs for ASME Code Class 1, 2, and 3 components ensure that the structural integrity of these components will be maintained throughout the components life. Other Technical Specifications require important systems to be operable (for example, ECCS) and in a ready state for mitigative action. This Technical Specification, CTS 4.3.b, is more directed toward prevention of component degradation and continued long term maintenance of acceptable structural conditions. The monitoring activity is of a preventive nature, rather than a mitigative action. Hence, it is not necessary to retain this Specification to ensure immediate

operability of safety systems. Further, this Technical Specification prescribes inspection (and repair) requirements which are performed during plant shutdown. CTS 4.3.b does not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and has been relocated to the IST Program.

(17) CTS 4.10, Seismic Instrumentation, (DOC R.20)
The seismic monitoring instrumentation provides monitoring capability by recording information regarding the severity of an earthquake to permit comparison of the measured response to that used in the design basis of the facility to determine if the plant can continue to be operated safely and to permit such timely action as may be appropriate pursuant to 10 CFR Part 100, Appendix A. Since this is determined after the event has occurred, it has no bearing on the prevention or mitigation of any DBA or transient. The safety analysis requirements do not address the need for seismic monitoring instrumentation that would automatically shut down the plant when an earthquake occurs which exceeds a predetermined intensity. The seismic monitoring instrumentation is not relied upon by operators to take immediate action in the event of an earthquake. CTS 4.10 does not meet the criteria in 10 CFR 50.36(C)(2)(ii) for retention in the ITS and has been relocated to the TRM.

The relocated specifications from the CTS discussed above are not required to be in the TS because they do not fall within the criteria for mandatory inclusion in the TS as stated in 10 CFR 50.36(c)(2)(ii). These specifications are not needed to obviate the possibility that an abnormal situation or event will give rise to an immediate threat to the public health and safety. In addition, the NRC staff has concluded that appropriate controls have been established for all of the current specifications and information that are being moved to the FSAR, TRM, ODCM, PCP or IST Program. These relocations are the subject of a new license condition discussed in Section 5.0 of this SE. Until incorporated in licensee-controlled documents, changes to these specifications and information will be controlled in accordance with the current applicable procedures and regulations that control these documents. Following implementation, the NRC may audit the removed provisions to ensure that an appropriate level of control has been achieved. The NRC staff has concluded that, in accordance with the Final Policy Statement, sufficient regulatory controls exist under the regulations, particularly 10 CFR 50.59 and 10 CFR 50.55a. Accordingly, the specifications and information, as described in detail in this SE, may be relocated from the CTS and placed in the licensee-controlled documents identified in the licensee's application dated December 11, 1998 (IPN-98-134), as supplemented by letters dated December 15, 1998 (IPN-98-139), May 17, 1999 (IPN-99-055), August16, 2000 (IPN-00-059), September 14, 2000 (IPN-00-059), September 27, 2000 (IPN-00-71), and November XX, 2000 (IPN-00-YYY)[to be provided].

F. Control of Specifications, Requirements, and Information Relocated from the CTS

In the ITS conversion, the licensee will be relocating specifications, requirements, and detailed information from the CTS to licensee-controlled documents outside the CTS. This is discussed in Sections 3.D and 3.E above. The facility and procedures described in the FSAR, and TRM, which is a part of the FSAR, can only be revised in accordance with the provisions of 10 CFR 50.59, which ensures records are maintained and establishes appropriate control over requirements removed from the CTS and over future changes to the requirements. Other licensee-controlled documents contain provisions for making changes consistent with applicable

regulatory requirements. For example, the Offsite Dose Calculation Manual can be changed in accordance with ITS 5.5.1, and the administrative instructions that implement the QA Plan can be changed in accordance with 10 CFR 50.54(a) and 10 CFR Part 50, Appendix B. The documentation of these changes will be maintained by the licensee in accordance with the record retention requirements specified in the licensee's QA Plan for IP3 and such applicable regulations as 10 CFR 50.59.

The license condition for the relocation of requirements from the CTS, which is discussed in Section 5.0 of this SE, will address the implementation of the ITS conversion, and the schedule for the relocation of the CTS requirements into licensee-controlled documents. The relocations to the FSAR, which includes the TRM, shall be included in the next required update of this document in accordance with 10 CFR 50.71(e).

G. Evaluation of Other TS Changes (Beyond-Scope Issues) Included in the Application for Conversion to ITS

This section addresses the beyond-scope issues in which the licensee proposed changes to both the CTS and STS. The following beyond-scope issues were addressed in the notice of consideration of amendment published in the *Federal Register* [on date (XX FR YYYYY) and on date (xx FR yyyyy)].

The changes discussed below are listed in the order of the applicable ITS specification or section, as appropriate (from ITS 3.3 to ITS 3.7.2).

(1) ITS 3.3 Setpoint and Allowable Changes Associated with the Adoption of the ITS
The following setpoints/allowable values were reviewed by the NRC staff:

CTS/DOC	TS (ITS)	Title	CTS Setpoint	ITS Allowable Value
2.3.1.A.(1) A.5	3.3.1.2.b	High flux, power range (low setpoint)	$\leq$ 25% RTP	$\leq$ 25% RTP
2.3.1.B.(1) A.4	3.3.1.2.a	High flux, power range (high setpoint)	$\leq$ 109%	$\leq$ 109%
2.3.1.B.(2) A.11	3.3.1.7.b	High pressurizer pressure	$\leq$ 2385 psig	$\leq$ 2408.24 psig
2.3.1.B(3) A.10	3.3.1.7.a	Low pressurizer presure	$\geq$ 1800 psig	$\geq$ 1749 psig
2.3.1.B(4) A.8.e	3.3.1.5	Overtemperature DeltaT	Changes to the Equation	
2.3.1.B(4) A.8	Table 3.3.1-1 Note 1	K1	1.20	1.285

2.3.1.B(4) A.8.c	Table 3.3.1-1 Note 1	Tow1	-	25 sec
2.3.1.B(4) A.8.c	Table 3.3.1-1 Note 1	Tow2	-	3 sec
2.3.1.B(5) A.9	3.3.1.6	Overpower DeltaT		
2.3.1.B(5) A.9	Table 3.3.1-1 Note 2	K4	$\leq$ 1.073	$\leq$ 1.154
2.3.1.B(6)(a) A.13/14	3.3.1.9	Low reactor coolant loop flow	$\geq$ 90%	$\geq$ 89%
2.3.1.C.(1) A.12	3.3.1.8	High pressurizer water level	$\leq$ 92%	$\leq$ 97.47%
2.3.1.C(2) A.19	3.3.1.13	Low-low steam generator water level	$\geq$ 5%	$\geq$ 3.54%
2.3.1.C(3) A.21	3.3.1.15	Auto stop oil pressure	-	$\geq$ 1.6 psig
Table 3.5-1 Functional Unit 1 A.5	Table 3.3.2-1 Function 1.c	High Containment Pressure (Hi Level)	$\leq$ 4.5 psig	$\leq$ 4.80 psig
Table 3.5-1 Functional Unit 2a A.12	Table 3.3.2-1 Function 2.c	High Containment Pressure (Hi-Hi Level) Containment Spray	$\leq$ 24 psig	$\leq$ 24.3 psig
Table 3.5-1 Functional Unit 2b A.21	Table 3.3.2.-1 Function 4c	High Containment Pressure (Hi-Hi Level) Steam Line Isolation	$\leq$ 24 psig	$\leq$ 24.3 psig
Table 3.5-1 Functional Unit 2b A.18	Table 3.3.2-1 Function 3.b(3)	High Containment Pressure (Hi-Hi Level) Containment Isolation -phase B	$\leq$ 24 psig	$\leq$ 24.3 psig
Table 3.5-1 Functional Unit 3 A.6	Table 3.3.2-1 Function 1.d	Pressurizer Low Pressure -Safety Injection	$\geq$ 1700 psig	$\geq$1684.64 psig

Table 3.5-1 Functional Unit 4 A.7	Table 3.3.2-1 Function 1.e	High Differential Pressure Between Steam Lines - Safety Injection	≤ 150 psi	≤ 208 psi
Table 3.5-1 Functional Unit 5 A.23/A.8	Table 3.3.2-1 Function 1.f	High Steam Flow in 2/4 Steam Lines Coincident with Tavg - Low - Safety Injection	≥ 540 F Tavg	≥ 535.6 F
Table 3.5-1 Functional Unit 5.a A.9/A.23	Table 3.3.2-1 Function 1.g	High Steam Flow in 2/4 Steam Lines Coincident with Low Steam Line Pressure - Safety injection	≥ 600 psig	≥ 476.0 psig
Table 3.5-1 Functional Unit 5.a A.8/A.22	Table 3.3.2-1 Note (c) Functions 1.f, 1.g, 4.d, 4.e	High Steam Flow in 2/4 Steam Lines Coincident with Tavg or Low Steam Line Pressure - Safety Injection & Steam Line Isolation	≤ 49%	≤ 54.4%
Table 3.5-1 Functional Unit 5.b A.9	Table 3.3.2-1 Function 4.d	High Steam Flow in 2/4 Steam Lines Coincident with low Tavg - Steam Line Isolation	≥ 540 F Tavg	≥ 535.6
Table 3.5-1 Functional Unit 5.a A.23	Table 3.3.2-1 Function 4.e	High Steam Flow in 2/4 Steam Lines Coincident with Low Steam Line Pressure - Steam Line Isolation	≥ 600 psig	≥ 476.0 psig
Table 3.5-1 Functional Unit 6 A.26	Table 3.3.2-1 Function 6.b	Steam Generator Water Level (Low-Low) - Auxiliary Feedwater	≥ 5%	≥ 3.54%
Table 3.5-3 Functional Unit 1.d Note 3 A.30	Table 3.3.2-1 Function 1.d Note b	Pressurizer Low Pressure Safety Injection	≤ 2000 psig	≤1998.24 psig

The licensee stated that their ITS allowable values are calculated in conformance with their Engineering Standards Manual IES-3 and IES 3-B, Instrument Loop Accuracy and Setpoint Calculation Methodology (IP3). The licensee further stated that their calculation methodology provided sufficient allowance between the actual setpoint and the analytical limit to account for known instrument uncertainties including design basis accident temperature and radiation effects or process dependent effects.

In response to staff request for additional information the licensee confirmed that their calculation methodologies conform to Regulatory Guide 1.105, Instrument Setpoints for Safety-Related Systems, Revision 2, dated February 1986, and ISA-RP67.04, Part II, Draft 9, Methodologies for the Determination of Setpoints for Nuclear Related Instrumentation, dated March 22, 1991. The licensee also confirmed that the same calculation methodologies were used for CTS Amendment 140, 24-Month Operating Cycle-Reactor Protection System, which the NRC approved by Safety Evaluation Report dated December 1, 1993, and CTS Amendment 150, 24-Month Operating Cycle - Engineered Safety Features Actuation System Instrumentation, which the NRC approved by Safety Evaluation dated October 11, 1994.

The staff concludes that the proposed TS changes are acceptable because:

– The new allowable values for the instrument setpoints have been derived using setpoint calculation methodologies that conform to Regulatory Guide 1.105, Revision 2, and ISA-RP67.04, Part II, Draft 9.

– The licensee has accounted for instrument uncertainties to provide adequate margin between the setpoints and the Analytical Limits.

– The NRC has approved similar setpoint calculation methodologies for 24-Month Operating Cycle extension.

(2) ITS 3.4.11 Pressurizer Power Operated Relief Valves (PORVs) (DOC M.1)
While in Condition B of ITS 3.4.11 with one PORV inoperable and not capable of being manually cycled, ITS Actions B.1 and B.2 require closure and removal of power from the associated block valve within 1 hour, and Action B.3 requires restoration of the PORV within 7 days. While in Condition C with one block valve inoperable, Action C.1 requires placing associated PORV in manual control within 1 hour, and Action C.2 requires restoration of the block valve within 7 days. The completion time of 7 days for restoration of an inoperable PORV or block valve is longer than the 72 hours specified in the STS. However, it is more restrictive than the CTS. CTS 3.1.A.4 specifies that whenever the RCS is above 400°F, the PORVs shall be operable or their associated block valves closed with control power removed. CTS 3.1.A.5 specifies that whenever the RCS is above 400°F, the motor operated block valves shall be operable or these two specifications allow unlimited operation with both PORVs and block valves inoperable as long as the block valve is closed, i.e., the sole safety function of the PORV and block valves is the isolation of the vent path if a PORV or block valve is inoperable. Therefore, the ITS Completion Time of 7 days for restoration of an inoperable PORV or block valve is more conservative than the current licensing basis, and is acceptable.

(3) ITS SR 3.4.14.1 Frequency (DOC M.5)
The frequency for the pressure isolation valve (PIV) leakage testing surveillance requirement, SR 3.4.14.1, is being extended from 18 to 24 months. The extension of the SR test frequency to 24 months is acceptable because it is consistent with the normal refueling cycle for IP3 and also meets the two-year inservice testing requirements for PIVs. SR 3.4.14.1 also extends the leakage test frequency from 9 months, as stated in the STS, to 12 months to verify leakage of certain PIVs prior to entering Mode 2 whenever the unit has been in Mode 5 for 7 days or more. The change from 9 months to 12 months is acceptable because this is a conditional frequency and is intended to approximate the midpoint of a normal refueling cycle which is 24 months for IP3.

(4) ITS 3.6.10, Weld Channel and Penetration Pressurization System (WC&PPS)(DOC L.1)
In their proposed ITS, IP3 proposes changes to the CTS requirements. Conceptually, IP3 has revised the approach of the WC&PPS TS requirements by focusing on ensuring the safety function (containment integrity) at individual component level rather than conducting repairs to restore zone operability. To do this, IP3 has modeled the WC&PPS loss of pressurization requirements after the requirements for containment isolation valves. This is a logical approach since the primary function of the WC&PPS is to act as a barrier to containment leakage similar to a containment isolation valve, and this barrier is established by component pressurization. For IP3, the changes also provide greater flexibility in repairing the inoperable sections of the system by first ensuring that the safety function is restored. Repairs can then be scheduled for an appropriate time. The quality assurance requirements of Title 10, Part 50 of the *Code of Federal Regulations* (10CFR50), Appendix B, require that IP3 schedule any repairs to this system consistent with their importance to safety. The proposed ITS retains the CTS minimum requirements for plant operation: WC&PPS system pressure greater than or equal to 43 psig and system air consumption less than or equal to 0.2% of the containment volume per day. However, the actions required if these conditions are not met are changed. These operating conditions provide the capability to readily identify leaks present in the system. The proposed ITS would require the individual components served by the system be isolated to restore their safety function rather than to require repair of the leak within seven days. Isolation of the component from the WC&PPS prevents the WC&PPS from becoming a leakage path in the event of a design basis accident. If, the leak is in the component served, then the Bases Section states that the applicable TS sections which cover the leaking components operability would apply.

The containment isolation valves for the WC&PPS at IP3 have been given an exemption from the requirements for Type C testing. There are three reasons for this. Specifically,

1- the WC&PPS is monitored for system leakage,
2- the system leakage rate is quantified every 36 months, and
3- the WC&PPS system pressure is maintained higher than the containment peak accident pressure.

Therefore, if the required pressure is not maintained or excessive leakage is identified, compensatory actions are necessary to ensure the containment boundary is maintained, and that the WC&PPS does not become a potential leakage path.

Based on an evaluation of the proposed IP3 ITS for section 3.6.10, the NRC staff concludes that the approach for the WC&PPS ITS proposed by IP3 is acceptable because they have adequately ensured that, upon system inoperabilities, the safety function of the system components is restored in a reasonable time and in a manner consistent with other similar containment boundaries (i.e., containment isolation valves). It is further concluded that the proposed changes to the action statements and required completion times for the WC&PPS are acceptable and do not have an adverse impact upon safety.

(5) ITS 3.7.2, Inclusion of Main Steam Check Valves (DOC L.1)
At IP3 each main steam line has one Main Steam Isolation Valve (MSIV) and one Main Steam Check Valve (MSCV). In the STS, TS 3.7.2 Conditions address only the MSIV operability. The licensee proposes to add MSCV operability to ITS 3.7.2 Conditions, which requires certain changes and additions to the Required Actions, beyond those in the STS. ITS 3.7.2.A. allows one or more MSCVs to be inoperable for up to 48 hours. CTS 3.4.B. allows all four MSIVs to be inoperable for up to 48 hours. The STS allows only one MSIV to be inoperable for up to 8 hours,

and more than one MSIV inoperable would require the initiation of an “ITS 3.0.3" shutdown. The licensee is also proposing, in the ITS, to allow only one (rather than one or more) MSIV to be inoperable for up to 48 hours. The licensee provides the following justification for the 48 hour completion time for one or more inoperable MSCVs: (1) MSCVs provide protection for an upstream main steam line break only and provide no protection for a downstream break, (2) only the one MSCV associated with the faulted steam generator is required to function to provide the required protection, and (3) proper functioning of the three MSIVs, not associated with the faulted steam generator, eliminates the need for the MSCV to function. The licensee concludes that the 48-hour completion time for one or more inoperable MSCVs is more conservative than a 48-hour completion time for one inoperable MSIV and significantly more conservative than a 48-hour completion time for all four MSIVs being inoperable, as is allowed by CTS 3.4.B. Since the CTS allows one or more MSIV to be inoperable for up to 48 hours, the proposed ITS 3.7.2.A., which allows one or more MSCV to be inoperable for up to 48 hours, is acceptable.

4.0 COMMITMENTS RELIED UPON

In reviewing the proposed ITS conversion for IP3, the staff has relied upon the licensee commitment to relocate certain requirements from the CTS to licensee-controlled documents as described in Table R, “Relocated Specifications,” and Table LA, “Removed of Details and Less Restrictive Administrative Changes to the CTS,” attached to this SE. This table reflects the relocations described in the licensee’s submittals on the conversion. The staff requested and the licensee submitted a license condition to make this commitment enforceable (see Section 5.0). Such a commitment from the licensee is important to the ITS conversion because the acceptability of removing certain requirements from the TS is based on those requirements being relocated to licensee-controlled documents where further changes to the requirements will be controlled by regulations or other requirements (e.g., in accordance with 10 CFR 50.59).

5.0 LICENSE CONDITIONS

A license condition to define the schedule to begin performing the new and revised SRs after the implementation of the ITS is to be included in the license amendment issuing the ITS. This schedule is:

- For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment.
- For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.
- For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.
- For SRs that existed prior to this amendment whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment.

The staff has reviewed the above schedule for the licensee to begin performing the new and revised SRs and concludes that it is an acceptable schedule.

Also, a license condition is to be included that will enforce the relocation of requirements from the CTS to licensee-controlled documents. The relocations are provided in Table R, "Relocated Specifications and Removal of Details Matrix," and Section 3.E above, "Relocated Entire CTS Specifications." The license condition states that the relocations would be completed no later than [ ], and the relocations to the FSAR shall be reflected in updates completed in accordance with 10 CFR 50.71(e). This schedule is acceptable.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the New York State official was notified of the proposed issuance of the ITS conversion amendment for IP3. The State official had no comments.

7.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an environmental assessment and finding of no significant impact was published in the *Federal Register* on December 15, 1999 (64 FR 70073), for the proposed conversion of the CTS to ITS for IP3. Accordingly, based upon the environmental assessment, the Commission has determined that issuance of this amendment will not have a significant effect on the quality of the human environment.

With respect to other changes included in the application for conversion to Improve Technical Specifications the items change requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments required by these other changes involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. In two sets of notices, the Commission issued proposed findings that the amendments required by these other changes involve no significant hazards consideration, and there has been no public comment on these findings published at: [ ]. Accordingly, these changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the implementation of these changes.

8.0 CONCLUSION

The IP3 ITS provides clearer, more readily understandable requirements to ensure safe operation of the plant. The NRC staff concludes that the ITS for IP3 satisfy the guidance in the Final Policy Statement on TS improvements for nuclear power reactors with regard to the content of TS, and conform to the STS provided in NUREG-1431, Revision 1, with appropriate modifications for plant-specific considerations. The NRC staff further concludes that the ITS satisfy Section 182a of the Atomic Energy Act, 10 CFR 50.36, and other applicable standards. On this basis, the NRC staff concludes that the proposed ITS for IP3 are acceptable.

The NRC staff has also reviewed the plant-specific changes to the CTS as described in this SE. On the basis of the evaluations described herein for each of the changes, the NRC staff also concludes that these changes are acceptable.

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) 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.

Attachments:
1. List of Acronyms
2. Table A of Administrative Changes to the CTS
3. Table M of More Restrictive Changes to the CTS
4. Table L of Less Restrictive Changes to the CTS
5. Table LA of Removed Details & Less Restrictive Administrative Changes to the CTS
6. Table R of Relocated Specifications from the CTS

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List of Acronyms

AC	Air Conditioning or Alternating Current
AFD	Axial Flux Difference
AOT	Allowed Outage Time
APRM	Average Power Range Monitor
ASME	American Society of Mechanical Engineers
ASTM	American Society for Testing and Materials
ATWS	Anticipated Transient Without Scram
ATWS-RPT	Anticipated Transient Without Scram - Recirculation Pump Trip
BPWS	Banked Position Withdrawal Sequence
PWR	Pressurized Water Reactor
WOG	Westinghouse Owners Group
CCW	Component Cooling Water
CW	City Water
CFR	Code of Federal Regulations
CFT	Channel Functional Test
COLR	Core Operating Limits Report
CRACS	Control Room Air Conditioning System
CRD	Control Rod Drive
CREF	Control Room Envelope Filtration
CRVS	Control Room Ventilation System
CRWA	Control Rod Withdrawal Accident
CST	Condensate Storage Tank
CTS	Current Technical Specification
DBA	Design-Basis Accident
DC	Direct Current
DG	Diesel Generator
DNB	Departure from Nucleate Boiling
DOC	Discussion of Change (from the CTS)
ECCS	Emergency Core Cooling System
EDG	Emergency Diesel Generator
EOC-RPT	End of Cycle - Recirculation Pump Trip
EPA	Electrical Protection Assembly
ESF	Engineered Safeguard Feature
FR	Federal Register
FRTP	Fraction of Rated Thermal Power
FSBEVS	Fuel Storage Building Emergency Ventilation System
GDC	General Design Criteria
GE	General Electric
HEPA	High Efficiency Particulate Air
Hz	Hertz
IRM	Intermediate Range Monitor
ISI	Inservice Inspection
IVSW	Isolation Valve Seal Water
ITS	Improved (converted) Technical Specifications
Kv	Kilovolt
kW	Kilowatt

LCO	Limiting Condition for Operation
LLS	Low-Low Set
LOCA	Loss of Coolant Accident
LOOP	Loss of Offsite Power
LOP	Loss of Power
LPCS	Low Pressure Core Spray
LPRM	Local Power Range Monitor
LSFT	Logic System Functional Test
LTOP	Low Temperature Overpressure Protection
MG	Motor Generator
MSIV	Main Steam Isolation Valve
MTC	Moderator Temperature Coefficient
MWD/T	Megawatt Days/short Ton
IP3	Indian Point Unit 3
NUMAC	Nuclear Measurement Analysis and Control
ODCM	Offsite Dose Calculation Manual
PAM	Post-Accident Monitoring
PIV	Pressure Isolation Valve
P/T	Pressure/Temperature
PORV	Power Operated Relief Valve
QA	Quality Assurance
QPTR	Quadrant Power Tilt Ratio
RAI	Request for Additional Information
RBM	Rod Block Monitor
RCS	Reactor Coolant System
RCIC	Reactor Core Isolation Cooling
RCS	Reactor Coolant System
RG	Regulatory Guide
RHR	Residual Heat Removal
RPS	Reactor Protection System
RPV	Reactor Pressure Vessel
RSCS	Rod Sequence Control System
RTP	Rated Thermal Power
RWCU	Reactor Water Cleanup
RWM	Rod Worth Minimizer
RWST	Reactor Water Storage Tank
SCIV	Secondary Containment Isolation Valve
SDC	Shutdown Cooling
SDM	Shutdown Margin
SDV	Scram Discharge Volume
SE	Safety Evaluation
SER	Safety Evaluation Report
SG	Steam Generator
SGT	Standby Gas Treatment
SLC	Standby Liquid Control
SR	Surveillance Requirement
SRM	Source Range Monitor
SRV	Safety/Relief Valve
SSER	Supplemental Safety Evaluation Report

STS	Improved Standard Technical Specification(s), NUREG-1431, Rev. 1
SW	Service Water
TRM	Technical Requirements Manual
TS	Technical Specifications
TSTF	Technical Specifications Task Force (re: generic changes to the STS)
UHS	Ultimate Heat Sink
UPS	Uninterruptible Power Supply
FSAR	Final Safety Analysis Report
V	Volt
VAC	Volts Alternating Current
VFTP	Ventilation Filter Test Program

ACCEPTABLE LICENSE CONDITION

APPENDIX D

ADDITIONAL CONDITIONS

FACILITY OPERATING LICENSE NO. NPF-64

The New York Power Authority shall comply with the following conditions on the schedules noted below:

Amendment Number	Additional Conditions	Implementation Date
	This amendment authorizes the relocation of certain Technical Specification requirements to licensee-controlled documents. Implementation of this amendment shall include the relocation of these technical specification requirements to the appropriate documents, as described in Table [LG of Details Relocated from Current Technical Specifications, Table R of Relocated Current Technical Specifications, and Table LS of Less Restrictive Changes to Current Technical Specifications] that are attached to the NRC staff's Safety Evaluation enclosed with this amendment.	The amendment shall be implemented by [date].
	The schedule for the performance of new and revised Surveillance Requirements (SRs) shall be as follows: For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment.	This amendment shall be implemented within XX days of the date of this

Amendment Number	Additional Conditions	Implementation Date
	For SRs that existed prior to this amendment whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment. For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment. For SRs that existed prior to this amendment whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to implementation of this amendment.	