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April 6, 2001

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

Subject: River Bend Station
Docket No. 50-458
License No. NPF-47
Supplement to License Amendment Request (LAR) 1999-30, "IFTS Blind Flange"

References:

1. Letter from Entergy Operations, Inc. (EOI) to USNRC, dated December 20, 1999, License Amendment Request (LAR) 1999-30, "IFTS Blind Flange"

2. Letter from EOI to USNRC, dated November 29, 2000, "Response to Request for Additional Information on River Bend License Amendment Request to permit removal of the Inclined Fuel Transfer System Blind Flange"

3. Letter from Entergy Operations, Inc. (EOI) to USNRC, dated January 24, 2001, License Amendment Request (LAR) 2000-27, "IFTS Operation in Modes 1, 2 and 3."

File Nos.: G9.5, G9.42

RBEXEC-01-018
RBF1-01-0067
RBG-45704

Gentlemen:

This letter supplements License Amendment Request (LAR) 1999-30. LAR 1999-30, as submitted by Reference 1, requested that the NRC approve and issue Technical Specification changes to Technical Specification 3.6.1.3, "Primary Containment Isolation Valve (PCIVs)" related to the Inclined Fuel Transfer System (IFTS) Blind Flange. This supplement provides additional information regarding issues and questions that have been discussed in several recent conference calls that have taken place between EOI and the NRC. EOI also requests that a 60-day limit, for the removal of the IFTS Blind

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Flange in Mode 1, 2 and 3 be applied to the December 20, 1999, amendment request. Justification for the proposed 60-day limit, including a Determination of No Significant Hazards Consideration was provided in EOI's January 24, 2001 submittal (reference 3).

Attachment 1 provides the request for applying the 60-day limit and includes requested supplemental information. Attachment 2 provides information regarding IFTS designated operator dose evaluation. Attachment 3 contains Technical Specification mark up pages showing changes to the original submittal.

This document contains new commitments. Attachment 4 contains a commitment identification form with those commitments.

Additional supplemental information, as requested, regarding the seismic qualification of the Inclined Fuel Transfer System and revision 3 of River Bend's Level 1 Individual Plant Examination (IPE), will be forwarded in a separate letter. If you have any questions, please contact Mr. Gregory P. Norris at (225) 336-6391.

Pursuant to 28 U.S.C.A. Section 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 6, 2001.

Very truly yours,

Randall K. Edington

RKE / RJK / GPN
attachment (4)

cc:

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ATTACHMENT 1

TO

LETTER NO. RBF1-01-0067

LICENSE NO. NPF-47

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-458

Licensing Document Involved

River Bend Station (RBS) Technical Specification 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)."

LAR Revision and Supplement

LAR Revision

This letter provides supplemental information regarding License Amendment Request (LAR) 1999-30 and revises the proposed change to Technical Specification 3.6.1.3, "Primary Containment Isolation Valve (PCIVs)" related to the Inclined Fuel Transfer System (IFTS) Blind Flange. LAR 1999-30, as submitted by Reference 1, requested that the NRC approve and issue changes to SR 3.6.1.3.3 which currently reads, "Verify each primary containment isolation ... blind flange that is ... required to be closed during accident conditions is closed." Entergy requests that the proposed NOTE 4, as originally requested in LAR 1999-30, be revised to limit removal of the blind flange to 60 days, as follows:

> "Not required to be met for the Inclined Fuel Transfer System (IFTS) penetration when the associated primary containment blind flange is removed, provided that the fuel building spent fuel storage pool water level is maintained greater than 23 feet above the top of the fuel, and the IFTS transfer tube drain valve and bottom gate valve remain closed. The IFTS transfer tube drain valve may be opened under administrative controls. Removal of the IFTS Blind Flange shall not exceed 60 days per operating cycle while in Modes 1,2 or 3."

Supplemental Information

Entergy submitted LAR 1999-30 on December 20, 1999. The request consisted of a change to Technical Specification 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)," to permit the removal of the inclined fuel transfer system (IFTS) primary containment isolation blind flange while the primary containment is required to be OPERABLE. The intent of the amendment was to allow limited operation of the IFTS during power operations, and enable RBS to test and exercise the system prior to the start of a refueling outage. The request followed similar requests by two other BWR 6 plants with inclined fuel transfer systems. Entergy later responded to a Request for Additional Information by letter dated November 29, 2000 (Reference 2). Since that time Entergy has engaged in several teleconferences with the staff discussing various issues. As a result of these teleconferences, Entergy agreed to provide supplemental information to aid the staff in its review.

This supplement provides additional information regarding issues and questions that were discussed in the conference calls that have taken place between Entergy and the NRC. The specific questions and issues concern the following topics:

- time constraints for the IFTS blind flange removal
- expected open duration of the IFTS drain valve
- the affect on drywell bypass leakage assumptions
- the affect on containment failure analysis
- dose to the operator performing local mitigating actions
- human factor issues (operator attentiveness and lighting)

Information concerning these questions and issues are addressed in detail below.

Establishment of a 60-day limit for IFTS Blind Flange Removal

Entergy requests that a 60-day limit for the removal of the IFTS Blind flange be applied to the December 20, 1999, amendment request (reference 1). The January 24, 2001, submittal (reference 3) also requested this change regarding the full operation of the IFTS system.

The RBS PRA analysis was performed assuming no time limit on removal of IFTS blind flange. Inclusion of a 60-day time limit further reduces the risk significance of removal of the IFTS blind flange.

The requested 60-day limit for the blind flange removal was established based on the following. In previous outages the IFTS system could not be started until the unit was in Mode 4. This required personnel to work around the clock to get the system ready for operation to support the outage. In Refuel (RF) Outage 8, this work took 14 continuous 24-hour days to make the system operable. Based on our experience in RF 8 we have estimated 34 ten-hour days for necessary maintenance. In addition, once the system was in operation Entergy had to qualify IFTS operators and have their On-the-Job Training cards signed off prior to allowing them to move any fuel. These training activities are expected to take at least two 24-hour days. With the IFTS blind flange removed this training and qualification can be performed prior to the outage and is expected to take approximately 5 ten-hour days. The last area in this scope of work concerns moving new fuel into the containment following the approval of EOIs January 24, 2001, amendment request. This is estimated to take 5 ten-hour days. This includes running the surveillances on both refueling bridges and the IFTS system. The remainder of the 60 days would cover weekends, where we will not be working, and additional time for unexpected problems.

Estimate of IFTS drain valve total open time during 60-day limit

The normal operation of the Inclined Fuel Transfer System (IFTS) is described below. Within the December 20, 1999 submittal (reference 1), a commitment is made to maintain the Bottom valve closed and hydraulically locked (deactivated). With the IFTS bottom gate valve deactivated, the cycle can be reversed from the FILL/DRAIN position after completion of the tube drain down and the IFTS carriage then returned to the upper pool.

Starting with the carriage in the upper containment pool with the upender in the vertical position, the initial valve positions are as follows:

- Flap valve – open
- Fill valve – open
- Drain valve – closed
- Bottom valve – closed

The Containment IFTS Operator lowers the upender and carriage to the inclined position by pushing the INCLINE pushbutton. The containment operator then pushes the WINCH LOWER pushbutton and the carriage lowers automatically to the FILL/DRAIN position. The Flap valve and Fill valve close and the Drain valve then opens. Once the upper portion of the tube is drained the Bottom valve automatically opens. The system automatically starts the carriage moving to the lower pool. Once the carriage is stopped in the lower upender the Fuel Building IFTS Operator pushes the VERT pushbutton and the upender and carriage move to the vertical position. The valve positions at this time are:

- Flap valve – closed
- Fill valve – closed
- Drain valve – open
- Bottom valve – open

To move the carriage back to the upper pool the Fuel Building IFTS Operator lowers the upender and carriage to the inclined position by pushing the INCLINE pushbutton. The Fuel Building IFTS Operator then pushes the WINCH-RAISE pushbutton. The carriage moves to the FILL/DRAIN position. At this time the Bottom and Drain valves close. The Fill valve opens and the tube fills. Once the tube is full the Flap valve opens. The system automatically starts the carriage moving to the containment upper pool. Once the carriage is stopped in the upper upender the Containment IFTS Operator pushes the VERT pushbutton and the upender and carriage move to the vertical position. The valve positions are:

- Flap valve – open
- Fill valve – open
- Drain valve – closed
- Bottom valve - closed

The time for a cycle down or up is approximately 3 minutes. The fill and drain cycle time is approximately 1 minute for each. These times exclude the time to load fuel or other components into or out of the IFTS carriage.

The estimated time that the IFTS Drain valve will be open is 9 days out of the 60 days requested. This was estimated by assuming a continuous 60-day period where the blind flange would be removed. During this time frame work would be performed on a five-day 10 hour per day work-week schedule. The estimate conservatively assumes that IFTS will be operated continuously when not isolated, which is estimated to be approximately 43 ten-hour days, or 430 hours. It is also assumed that the Drain valve will be closed half of the time and open half of the time as IFTS is cycled, or approximately 215 hours. The Flap and Fill valves would be open the remainder of the time, approximately 51 days. The system will be isolated by closure of the IFTS drain valve on weekends and night shifts when work is not being performed. River Bend will also maintain the second IFTS drain line motor operated valve (MOV) closed during these periods when the IFTS is not operating.

Allowable DW Bypass

The small-break LOCA with drywell bypass was developed to assure that containment integrity was maintained following the onset of a small break in the drywell. NUREG-800, section 6.2.1.1.C, stated that for Mark III containments, the containment steam bypass capability for small breaks should be 1 ft^2 $A\sqrt{K}$. The RBS containment design pressure is 15 psig. This is above the calculated worst case small break LOCA pressure with maximum allowable steam bypass of 1 ft^2 $A\sqrt{K}$. Therefore, the containment is capable of withstanding the internal pressure due to a small break LOCA. Removal of the blind flange affects neither the peak containment pressure nor the design pressure of containment. Therefore the removal of the blind flange does not change the containment's ability to withstand a small break LOCA. Removal of the IFTS blind flange may increase the containment leakage during a small break LOCA, depending on the system configuration. However, per the requested change, the blind flange will only be removed for 60 days during the cycle and the removal of the blind flange has been shown to be non-risk significant per EPRI TR-105396, PSA Application Guidelines, and Reg. Guide 1.174.

Per GDC 50, the containment is to be designed such that the containment structure can accommodate, without exceeding the design leakage rate and with sufficient margin, the calculated pressure and temperatures from any loss-of-coolant accident. Per 10CFR50, Appendix J, the design leakage is tested assuming a containment pressure greater than P_a. At River Bend, P_a is the peak containment pressure resulting from a large break LOCA. The drywell peak pressure listed in the River Bend USAR results from the main steam line break. The peak containment pressure is relatively insensitive to break size and location; however, the peak containment pressure listed in the River Bend USAR is due to the recirculation line break. The LB-LOCA is considered the DBA-LOCA due to the bounding inventory releases and subsequent dose consequences. This is consistent with NUREG-0800, Section 6.2.1.C that states "For Mark III plants, the steam

line break has been determined to be the design basis accident. However, mass and energy releases from the recirculation line break will be evaluated using various flow correlations." As stated earlier, the DBA-LOCA P_a is less than the failure pressure of the IFTS tube water seal. The IFTS drain valve will be placed in the site leakage rate test program and will be included in the allowable containment leakage. Therefore, with the blind flange removed the RBS containment can accommodate the DBA-LOCA without exceeding the design leakage rate and the required 15% margin defined in NUREG-0800, Section 6.2.

Based on the above discussion, EOI believes all of the regulatory requirements for containment are met with the blind flange removed and an allowable drywell bypass at the current Technical Specification value of $1ft^2$ $A\sqrt{K}$.

Containment Failure Pressure

As provided in the January 24, 2001, submittal (reference 3): "The current RBS EOP Appendix C calculation assumes a containment failure pressure of 53 psig based on a detailed containment analysis. This evaluation assumes that the IFTS blind flange is installed. The IFTS tube was evaluated to withstand a pressure of 40 psig, with the blind flange removed. Additionally, the containment would begin to vent into the fuel building at a containment pressure of 9 psig. Revision of the EOPs, assuming a containment failure pressure lower than 53 psig, would affect both PSP (pressure suppression pressure) and PCPL (primary containment pressure limit). Revision of the EOPs, assuming the containment failure pressure is that of the IFTS water seal, would cause a large change in both PCPL and PSP curves. The reduction of PCPL would be such that emergency depressurization would be required prior to the containment reaching 9 psig, which is well below the containment design basis pressure. However, this reduction in containment failure pressure will only be present a maximum of 60 days during an 18-month cycle and is considered a plant evolution. Additionally, per EOP-0003, operators are instructed to isolate any leakage paths between the containment and the secondary containment/fuel building. Therefore, this change does not affect the EOPs or the pressure at which intentional containment venting would occur."

Additional information concerning containment failure pressure is provided in the tables below:

Containment Failure Pressure Table

Failure Location	Median Failure Pressure (PSIG)	95% Non-exceedance (PSIG)	Median Leakage Area (sq in)
Cont Vessel Equip Hatch	39	25	1.6
Cont Dome Vent	56	45	3
Drywell Hatch	56	42	Insignificant
Cont Airlock seals	67	50	Insignificant
IFTS Tube (Blind Flange Installed)	88	58	12
Cont Dme	107	86	Uncontrolled
Cont Wall	111	90	Uncontrolled
Drywell Structure	124	92	Uncontrolled
Cont Base Anchorage	113	85	Uncontrolled
Refueling Head	130	93	Insignificant
IFTS Tube (Blind Flange Removed)	62	50	Uncontrolled

Containment Failure Probability Contribution

Pressure	BF Installed Penet Failure	BF Installed Gross Failure	BF Removed Penet Failure w/ BV closed	BF Removed Gross Failure w/ BV Closed	BF Removed Penet Failure w/ BV Open	BF Removed Gross Failure w/ BV Open
10	0.001	0	2.32E-07	0	1	0
25	0.05	0	0.05	0	1	0
50	0.856	8.12E-07	0.815	0.049	0.951	0.049
75	0.9876	0.0123	0.071	0.929	0.071	0.929
100	0.4213	0.5786	4.96E-05	0.99	4.97E-05	0.99
125	0.0058	0.9942	2.00E-10	0.9999	2.00E-10	0.9999
150	2.40E-06	0.9999	0	1	0	1
175	0	1	0	1	0	1

BF - Blind Flange
BV - Bottom Valve
Penet - Penetration

Operator Dose

Current survey data, recorded February 3, 2001, shows that the waiting area where the designated operator is to be stationed is currently designated a "low dose waiting area" for the Fuel Building 70' elevation. The general area radiation level for the waiting area is 2 mR/hr. Historical survey data, from 1997 to present, indicates that the general area radiation levels in the vicinity of the specified waiting area have been consistently in the range of 2 mR/Hr. Attachment 2 provides specific information related to the IFTS designated operator dose evaluation.

Human Factors - Designated Operator Attentiveness

Regarding the rotation of the Designated Operator and ensuring his attentiveness, River Bend stated in its November 29, 2000, letter (reference 2) that:

> "Rotation of the dedicated operator(s) will be scheduled periodically to minimize fatigue and to help ensure their attentiveness."

To further ensure that the Designated Operator will be attentive and alert during the period of time that the IFTS drain valve is open, River Bend will notify the Designated Operator prior to each operation of the IFTS drain valve. This requirement will be placed within the procedure for operating IFTS in Modes 1, 2, and 3.

Human Factors - Lighting Requirements for the Designated Operator

In its November 29, 2000 letter (reference 2), River Bend made the following statement:

> "Emergency lights are installed which light exit areas to the east and southwest of the IFTS drain tank and also in the hallway area to the north where the dedicated operator will be stationed. It was found that the emergency lighting levels on the valve platform are less than desired. Therefore, River Bend will install additional emergency lighting prior to removing the IFTS Blind Flange in Mode 1,2 or 3, in order to provide adequate illumination of the IFTS drain valve platform in the event that any loss of normal power occurs. The dedicated operator will also be provided with portable lighting or flashlight. "

To support this, River Bend performed three simulations with 3 individual designated operators performing their required action while using the existing emergency lighting in the Fuel Building 70' elevation. All three designated operators were able to close the IFTS Drain line isolation MOV and exit the building under these conditions. Based on this simulation, River Bend has demonstrated that the existing emergency lighting is adequate to safely perform the action of closing the IFTS Drain line isolation MOV and exit the Fuel Building. The timing results for the simulation are shown below.

	Time to manually close IFTS Drain Line MOV (Seconds)	Total time to close valve and exit building (Seconds)
Operator 1	68	106
Operator 2	73	118
Operator 3	53	84

In addition, River Bend will provide training related to the manual operation of motor operated valves and use of their position indications to all IFTS designated operators. This training will include hands-on instruction using an MOV of similar design in a training facility mock up and will include a walk-down of the actual IFTS drain line MOV in the Fuel Building. This training will include instruction on the use of MOV position indicators and methods of verifying valve position.

ATTACHMENT 2

TO

LETTER NO. RBF1-01-0067

LICENSE NO. NPF-47

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-458

IFTS Designated Operator Dose Evaluation

Background

In support of LAR 1999-30, River Bend evaluated the potential dose consequences to an operator staged to manually close the IFTS drain line should an accident occur. The acceptance criteria used in the analysis, was 10CFR50, Appendix A, GDC 19, or 5 REM whole body. Thyroid doses were not calculated since there would not be a significant amount of airborne iodine in the fuel building for the first few minutes of the event.

Below is a list of general assumptions with respect to this evolution:

1. Both isolation valves in the drain line will be isolated unless needed to directly support plant activities. When the valves will be manipulated, a dedicated operator will staged to isolate the drain line.

2. The operator will be staged in a low dose waiting area near the IFTS drain tank. The normal operation background dose rate is generally $\leq$ 2 mR/hr. The two isolation valves are accessible on the platform at the end of the tank itself. The staging area is denoted on the figure 1 below.

3. The operator will be in constant communication with the control room as will the IFTS panel operator. The preferred method of isolating the valve will be remotely via the IFTS panel. Should off-site power be lost, or upon direction by the MCR, the staged operator will proceed to the IFTS drain line and close the isolation valve.

4. Upon isolation, the operator will egress the area by proceeding north, climbing the stairs, and exiting the Fuel Building through the door located roughly at lines plant FE and 5 (USAR Figure 1.2-20) and finally proceeding to either the Technical Support Center, the Main Control Room, or the exiting the plant entirely as directed by Operations. Figure 1 below shows the pathway within the fuel building.

Calculation Assumptions

RBS calculation G13.18.9.4*031 determined the potential dose consequences to an operator staged to manually close the IFTS drain line should an accident occur. This evaluation considered the following contributors:

1. IFTS Drain Line and Tank

The IFTS drain line and tanks were not considered as a significant contributor in the evaluation. As discussed previously, walk-downs indicate that it takes approximately 1 minute to close one of the drain line isolation valves. GE Report "Prediction of the Onset of Fission Gas Release from Fuel in Generic BWR," dated July 1996, demonstrates that fuel damage will not occur within 121 seconds of a LOCA. This report was deemed "acceptable for all currently operating BWRs" by the NRC as documented in Reference 6. Since fission gases will not be released prior to the drain line being isolated, dose from the drain line and tank was neglected. Note that

this "timing only" application of Alternate Source Term was only applied as justification for neglecting the tank and drain line as a source. All other dose contributors were based on TID-14844/Reg. Guide 1.3 dose methodology.

2. Containment Shine

The dose due to "shine" from airborne isotopes inside containment was considered. A simple model using the Microshield v5.02 computer code was developed. The airborne source term was assumed to consist of 100% of the core noble gases and 25% of the core iodines consistent with Regulatory Guide 1.3 guidance. This was assumed to be released at the onset of the event. This model credited shielding from the containment (1.5" steel/iron) and the shield building (30" concrete). No penetrations were identified on the 70' elevation which would potentially stream radiation through the shield building.

3. Suppression Pool Shine

Shine from isotopes within the suppression pool were also considered. A simple annular model was developed using Microshield. 50% of the core iodines were assumed to be in the suppression pool. Self-shielding by the SP water was credited in addition to crediting the containment and shield buildings for shielding.

4. Airborne Isotopes in Fuel Building

The dose consequences from containment leakage which would potentially enter the Fuel Building were also included in this evaluation. This dose was based primarily on an existing evaluation prepared in support of Equipment Qualification doses. The evaluation assumed 13,500 cc/hr of containment leakage (Ref.: USAR Section 15.6.5) was released directly into the fuel building where it was mixed homogeneously with the FB atmosphere. This is conservative since the primary potential source for annulus bypass is the airlock which is located on the 113'elevation. Intake of radioisotopes from the FB ventilation supply fans was also considered.

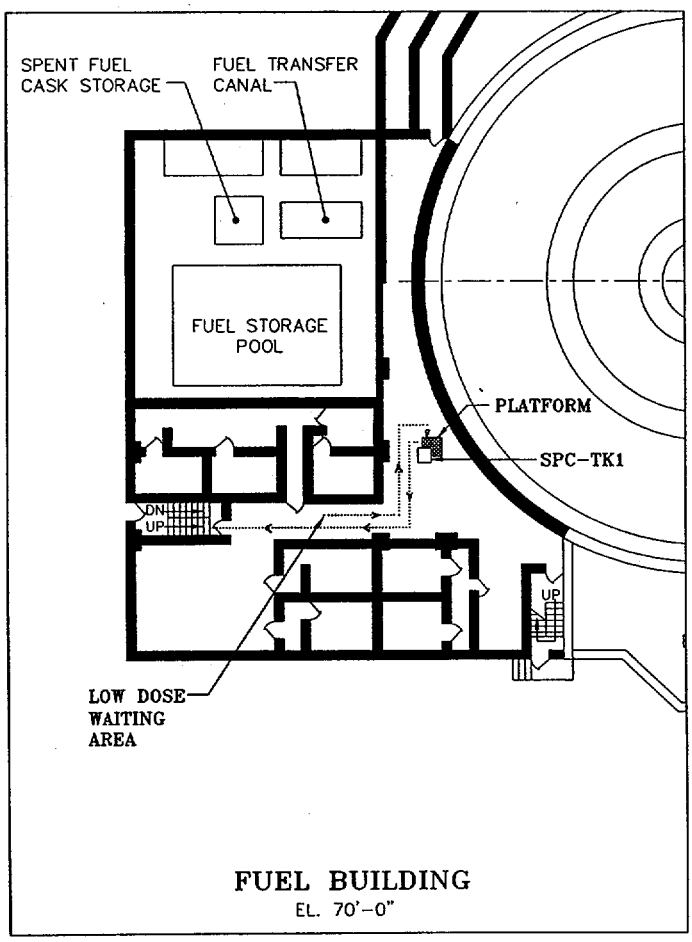
The analysis assumed that the drain line was isolated within two minutes. A rigorous analysis of the egress path was not performed. Rather, it was further assumed that egress from the area took an additional five minutes. The dose rate at the drain tank was conservatively applied for isolation of the drain valve and the duration of this egress (i.e., a total of 7 minutes). These conservative assumptions would easily bound a rigorous analysis if one were performed. The dose from each of these contributors is found in Table 1 below.

Table 1

IFTS Operator Doses

Contributor	Dose (Rem)
Containment Shine	3.2
SP Shine	<0.001
FB Airborne Dose	0.6
Total	***3.8***
GDC 19	*5.0*

Figure 1



References

1. RBS Calculation G13.18.9.4*032-0, "Post-LOCA Operator Dose During Isolation of the IFTS Drain Line"
2. USAR Figure 1.2-20, "General Arrangement – Fuel Building"
3. USAR Section 12.3, "Radiation Protection Design Features"
4. USAR Section 15.6.5, "Loss of Coolant Accident"
5. GE Report " Prediction of the Onset of Fission Gas Release from Fuel in Generic BWR," dated July, 1996.
6. NRC Letter from S. P. Sekerak (NRC) to W.A. Eaton, dated Sept. 9, 1999, approving the GR Fission Gas Release Report

ATTACHMENT 3

TO

LETTER NO. RBF1-01-0067

LICENSE NO. NPF-47

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-458

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
SR 3.6.1.3.2 ----------NOTES---------- 1. Only required to be met in MODES 1, 2, and 3. 2. Valves and blind flanges in high radiation areas may be verified by use of administrative means. 3. Not required to be met for PCIVs that are open under administrative controls. ---------- Verify each primary containment isolation manual valve and blind flange that is located outside primary containment, drywell, and steam tunnel and is required to be closed during accident conditions is closed.	31 days
SR 3.6.1.3.3 ----------NOTES---------- 1. Only required to be met in MODES 1, 2, and 3. 2. Valves and blind flanges in high radiation areas may be verified by use of administrative means. 3. Not required to be met for PCIVs that are open under administrative controls. ---------- Verify each primary containment isolation manual valve and blind flange that is located inside primary containment, drywell, or steam tunnel and is required to be closed during accident conditions is closed.	Prior to entering MODE 2 or 3 from MODE 4, if not performed within the previous 92 days

INSERT

(continued)

Insert for SR 3.6.1.3.3

4. Not required to be met for the Inclined Fuel Transfer System (IFTS) penetration when the associated primary containment blind flange is removed, provided that the fuel building spent fuel storage pool water level is maintained greater than 23 feet above the top of the fuel, and the IFTS transfer tube drain valve and bottom gate valve remain closed. The IFTS transfer tube drain valve may be opened under administrative controls. Removal of the IFTS Blind Flange shall not exceed 60 days per operating cycle while in Modes 1,2 or 3.

ATTACHMENT 4

TO

LETTER NO. RBF1-01-0067

LICENSE NO. NPF-47

ENTERGY OPERATIONS, INC.

DOCKET NO. 50-458

Commitment Identification Form

COMMITMENT	ONE-TIME ACTION*	CONTINUING COMPLIANCE*
River Bend will also maintain the second drain line MOV closed during the periods when the IFTS is not operating. *(Extracted from Attachment 1 Page 4 of 8, under heading "Estimate of IFTS drain valve total open time during 60 day limit")*		X
River Bend will notify the Designated Operator prior to each operation of the IFTS drain valve. This requirement will be placed within the procedure for operating IFTS in Modes 1, 2, and 3. *(Extracted from Attachment 1 Page 7 of 8, under heading " Human Factors - Designated Operator Attentiveness")*		X
River Bend will provide training related to the manual operation of motor operated valves and use of their position indications to all designated operators. This training will include hands-on instruction using an MOV of similar design in a training facility mock up and a walk-down of the actual IFTS drain line MOV in the Fuel Building. The training will include instruction on use of position indicators and methods of verifying valve position. *(Extracted from Attachment 1 Page 8 of 8, under heading " Human Factors - Lighting Requirements for the Designated Operator ")*		X

*Check one only