



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

November 5, 2001
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File No.: G25
10CFR50.90

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

South Texas Project
Units 1 and 2
Docket Nos. STN 50-498, STN 50-499
License Amendment Request -
Proposed Amendment to South Texas Project Technical Specifications to
Revise Administrative Control Requirements

Pursuant to 10 CFR 50.90, STP Nuclear Operating Company (STPNOC) hereby requests an amendment to the South Texas Project Operating Licenses NPF-76 and NPF-80 by incorporating the attached changes into the Unit 1 and 2 Technical Specifications (TS).

The proposed change revises various requirements denoted in, or associated with Section 6.0 of the TS, "Administrative Controls." The proposed change updates the TS to be consistent with current industry standards and guidance. Attachment 1 provides a detailed description of the proposed change, a safety analysis of the change, a determination that the proposed change involves no significant hazards consideration, and an evaluation of the requirement for an environmental assessment of this requested licensing action. Attachment 2 provides the affected TS pages and associated information-only Bases page annotated to reflect the proposed change. Attachment 3 provides a retyped copy of the affected TS pages.

STPNOC requests NRC approval by April 30, 2002. Additionally, STPNOC requests 90 days for implementation of the approved amendment in order to modify the licensee-controlled documents to which much of the information is being relocated.

STPNOC is notifying the State of Texas of this request for license amendment in accordance with 10 CFR 50.91(b).

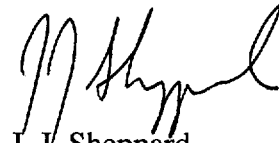
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If there are any questions regarding the proposed amendment, please contact Mr. J. R. Morris at (361) 972-8652 or me at (361) 972-8757.

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

Executed on 11/5/01



J. J. Sheppard
Vice President
Engineering & Technical Services

JRM/

Attachments:

1. Description of Changes and Safety Evaluation
2. Annotated Technical Specification Pages and Associated Bases (Information Only) Page
3. Technical Specification Pages with Proposed Changes Incorporated

cc:

Ellis W. Merschoff
Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, Texas 76011-8064

Mohan C. Thadani
Addressee Only
U. S. Nuclear Regulatory Commission
Project Manager, Mail Stop OWFN/7-D-1
Washington, DC 20555-0001

Cornelius F. O'Keefe
U. S. Nuclear Regulatory Commission
P. O. Box 289, Mail Code MN116
Wadsworth, TX 77483

A. H. Gutterman, Esquire
Morgan, Lewis & Bockius
1800 M. Street, N.W.
Washington, DC 20036-5869

M. T. Hardt/W. C. Gunst
City Public Service
P. O. Box 1771
San Antonio, TX 78296

A. Ramirez/C. M. Canady
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

Jon C. Wood
Matthews & Branscomb
112 East Pecan, Suite 1100
San Antonio, Texas 78205-3692

Institute of Nuclear Power
Operations - Records Center
700 Galleria Parkway
Atlanta, GA 30339-5957

Richard A. Ratliff
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756-3189

R. L. Balcom/D. G. Tees
Reliant Energy, Inc.
P. O. Box 1700
Houston, TX 77251

C. A. Johnson/R. P. Powers
AEP - Central Power and Light Company
P. O. Box 289, Mail Code: N5022
Wadsworth, TX 77483

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555-0001

ATTACHMENT 1

DESCRIPTION OF CHANGES

AND

SAFETY EVALUATION

DESCRIPTION AND ASSESSMENT

1.0 INTRODUCTION

This license amendment request proposes to revise Section 6.0 of the Technical Specification (TS), "Administrative Controls," for South Texas Project Units 1 and 2. An annotated copy of the affected TS pages and associated Bases (for information only) page is provided in Attachment 2. A retyped copy of the affected TS pages is provided in Attachment 3. The evaluation performed in support of this amendment request does not result in any required changes to the Updated Final Safety Analysis Report (UFSAR) except for the specific relocation of requirements from TS 6.8.3.f to UFSAR Section 3.9.1.

2.0 DESCRIPTION

The proposed amendment revises specific Administrative Control requirements denoted in Section 6.0 of the TS and associated Administrative Control requirements located in other sections of the TS. The proposed amendment includes relocating specific TS Administrative Control requirements to licensee-controlled documents, updating specific management titles to more generic title positions, updating requirements to be consistent with current industry standards, and reformatting, renumbering, and rewording existing requirements for better readability.

3.0 BACKGROUND

STPNOC has identified specific management title changes that impact the current TS and require a proposed license amendment request. These specific management title changes would be eliminated from the TS and replaced with generic titles consistent with current industry guidance. STPNOC management also undertook an effort to evaluate and incorporate other current industry guidance affecting Section 6.0 of the TS. The proposed amendment, in part, revises the requirements of Section 6.0 of the TS to be consistent with the Improved Standard Technical Specifications (NUREG-1431, "Standard Technical Specifications, Westinghouse Plants") and associated approved Generic Travelers, and with 10CFR 50.36(c)(4). The specific changes to the TS are summarized in Table 1.

4.0 TECHNICAL ANALYSIS

The specific proposed changes are identified in Table 1 and the technical analysis for each specific change is identified by one of four specific types of changes. The license amendment request has been organized such that changes are included in the following change categories, as appropriate.

"Administrative" (non-technical) changes are intended to incorporate human factors principles into the form and structure of the TS so that plant operations personnel can use them more easily. These changes are editorial in nature or involve the reorganization or reformatting of the current TS requirements without affecting technical content or operational restrictions. Every Administrative Controls Section of the TS reflects this type of change. In order to ensure

consistency, STPNOC used NUREG-1431 and associated approved Generic Travelers to the NUREG as guidance to reformat and make administrative changes. These changes (1) are consistent with NUREG-1431 (where identified), (2) are compatible with the Writers Guide for NUREG-1431, (3) do not result in any substantive change in operating requirements, and (4) are consistent with the Commission's regulations. These changes are editorial in nature and have no impact on plant operation or plant safety, and have been previously found acceptable by the NRC.

"More Restrictive" technical changes are changes to existing requirements that STPNOC has elected to implement for consistency with current industry guidance that are more restrictive than those in the current TS. The changes in this category include requirements that are either new, more conservative than corresponding requirements in the current TS, or that have additional restrictions that are not in the current TS but are contained in industry guidance documents. These changes are additional restrictions on plant operation that enhance safety and have been previously found acceptable by the NRC.

"Less Restrictive" technical changes include deletions and relaxations to portions of current TS requirements. When requirements have been shown to provide 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 Improved Standard Technical Specifications. The NRC staff reviewed generic relaxations contained in the Improved Standard Technical Specifications and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The TS were reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for these requirements, and thus provide a basis for changing the current TS.

"Relocated" technical changes include requirements that have been shown to provide little or no safety benefit, and their relocation from the TS to other licensee-controlled documents may be appropriate. In most cases, relocations previously approved for 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 Improved Standard Technical Specifications. The NRC has reviewed generic relocations contained in Improved Standard Technical Specifications and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. Additionally, relocating details from the current TS has been found acceptable since this information is adequately controlled in the UFSAR, controlled design documents and drawings, or the OQAP, as appropriate. The TS were reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for these requirements, and thus provide a basis for changing the current TS. The NRC has previously concluded that these relocated relaxations are not necessary to ensure the effectiveness of TS to adequately protect the health and safety of the public. Accordingly, these requirements are moved to one of the following licensee-controlled documents for which changes are adequately governed by a regulatory requirement: (1) the UFSAR controlled by 10 CFR 50.59; (2) the TRM controlled by 10 CFR 50.59; (3) the Offsite Dose Calculation Manual (ODCM) controlled by 10 CFR 50.59; and (4) the OQAP as approved by the NRC and controlled by 10 CFR 50.54

TABLE 1

Change Type Codes: A - Administrative
M - More Restrictive than Current TS
L - Less Restrictive than Current TS (other than a relocation of requirements)
R - Relocation from Current TS to Other Licensee-Controlled Documents

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
1a	General	A	Modified Heading structures. Each page will include "6.0 Administrative Controls" and the major heading number and title of the section (e.g., "6.1 Responsibilities").	This is an editorial change to improve the consistency and readability of the TS. This change is consistent with NUREG-1431
1b	General	A	Modified Heading structures. The heading for major sections that have been deleted/relocated will include the section number and the words "Not Used." Individual section numbers and titles will be retained in the body of the TS with notations indicating the section is not used.	This is an editorial change to improve the format, functionality and readability of the TS. This change minimizes the impact of the major changes being made to Section 6.0. This change is consistent with NUREG-1431.
2	All	A	Added double lines across the page at the end of a major section (e.g., 6.1) to indicate the end of the Specification. Added single lines across the page with the word "continued" if information of a subsection (e.g. 6.3.1) is continued on the subsequent page.	This is an editorial change to improve the format, functionality and readability of the TS by providing a visual cue of the end or continuance of a specification. This change is consistent with NUREG-1431.

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
3	All	A	Reformatted paragraph structures providing consistent numbering scheme, indentation, and alignment. Deleted and added titles for sections and subsections as necessary to provide a standard format.	This is an editorial change to improve the format, functionality and readability of the TS. This change is consistent with NUREG-1431.
4	6.1.1	R	Changed "Plant Manager" to "plant manager"	The specific position title is replaced with the generic title. The description of this specific title is currently located in the OQAP and the UFSAR. Personnel who fulfill this position are required to meet specific qualifications as detailed in TS 6.3.1. This relocation is consistent with the NRC letter from C. Grimes to the Owners Groups Technical Specification Committee Chairmen, dated November 10, 1994. The various requirements of the assignment are still retained in the TS and the functions, duties and responsibilities of the position have not been affected by the proposed change. This change is consistent with NUREG-1431, as modified by NRC approved TSTF-065, Revision 1. The relocated specific title is not required to be in the TS to provide adequate protection of the public health and safety. Changes to the OQAP are controlled by the provisions of 10 CFR 50.54. Changes to the UFSAR are controlled by the provisions of 10 CFR 50.71(e).

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
5	6.1.1	A	<p>Relocated one sentence from each of TS 6.5.3.1.b and 6.5.3.1.c (Change # 42) and combined them to read:</p> <p>“The plant manager or the plant manager’s designee shall approve, prior to implementation, each proposed test and experiment not described in the UFSAR, and each modification to systems or equipment that affect nuclear safety.”</p>	Refer to Change # 42 for justification.
6	6.1.2	A	Changed “Shift Supervisor” to “shift manager”	<p>The specific position title is replaced with the generic title. Personnel who fulfill this position are required to meet specific qualifications as detailed in TS 6.3.1. This change is consistent with the NRC letter from C. Grimes to the Owners Groups Technical Specification Committee Chairmen, dated November 10, 1994. The various requirements of the assignment are still retained in the TS and the functions, duties and responsibilities of the position have not been affected by the proposed change. The specific title is not required to be in the TS to provide adequate protection of the public health and safety.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
7	6.1.2	A	<p>Replaced</p> <p>“(or during his absence from the control room, a designated individual)”</p> <p>with the following relocated from Table 6.2-1 (Change # 35):</p> <p>“During any absence of the shift manager from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function for that unit. During any absence of the shift manager from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator (RO) license shall be designated to assume the control room command function for that unit.”</p>	<p>Current TS 6.1.2 assigns the responsibility for directing the control room command function to the Shift Supervisor (shift manager). The proposed change does not change existing TS requirements except to (1) specify an active license instead of a valid license, (2) add reference to “that unit”, and (3) delete the parenthetical exclusion of the use of the Shift Technical Advisor (STA). Specifying an active license rather than a valid license is an editorial change that eliminates a possible ambiguity and provides clarification of the requirement. The proposed change is consistent with NUREG-1431. Specifying “that unit” clarifies the intent of the current requirements for a two-unit plant with separate control rooms. The current requirements of TS Table 6.2-1 allow the Shift Supervisor of one unit to fill the same position on the opposite unit. The proposed change is consistent with NUREG-1431.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
8	6.1.2	A	Deleted “A management directive to this effect, signed by the President and Chief Executive Officer shall be issued to all station personnel on an annual basis.”	The TS assigns responsibility for the control room command function. The UFSAR also delineates the responsibilities of the Shift Supervisor. The current requirement serves only as a reminder to personnel as to who is in charge. Nowhere else in the TS is a management directive required to remind personnel of a TS requirement. Since the responsibility requirement is not being changed, this deletion is considered administrative with no impact on the margin of safety. This change is consistent with NUREG-1431.
9	6.2.1	A	Reformatted to have subsection title as a numbered item.	This is an editorial change to improve the format, functionality and readability of the TS. This change is consistent with NUREG-1431.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
10	6.2.1.a	A	<p>Changed</p> <p>“Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions.”</p> <p>to</p> <p>“Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions.”</p>	<p>This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
11	6.2.1.a	A	<p>Changed</p> <p>“These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or equivalent forms of documentation.”</p> <p>to</p> <p>“These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, job descriptions for key personnel positions, or in equivalent forms of documentation.”</p>	<p>This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
12	6.2.1.a	R	<p>Changed</p> <p>“These requirements shall be documented in the FSAR.”</p> <p>to</p> <p>“These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the UFSAR and/or the Operations Quality Assurance Plan.”</p>	<p>This change provides clarification to the existing TS 6.2.1.a organization requirement. Specific position titles have been replaced with generic titles throughout the TS and the specific position titles are relocated to the OQAP and/or the UFSAR. This is consistent with the NRC letter from C. Grimes to the Owners Groups Technical Specification Committee Chairmen, dated November 10, 1994, and with NUREG-1431, as modified by NRC approved TSTF-065. Changes to the OQAP are controlled by the provisions of 10 CFR 50.54. Changes to the UFSAR are controlled by the provisions of 10 CFR 50.71(e).</p>
13	6.2.1.b	R	<p>Changed “Plant Manager” to “plant manager”</p>	<p>Refer to Change # 4.</p>
14	6.2.1.b	A	<p>Changed</p> <p>“responsible for overall unit safe operation”</p> <p>to</p> <p>“responsible for overall safe operation of the plant”</p>	<p>This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
15	6.2.1.c	R	Changed “The Vice President, Nuclear Generation,” to “A specified corporate officer”	Refer to Change # 12.
16	6.2.1.d	A	Changed “operating staff and those who carry out health physics and quality assurance functions” to “operating staff, carry out radiation protection functions, or perform quality assurance functions”	This is an editorial change to improve grammar and readability, and to revise staff functional titles to be consistent with STP organization terminology. This requirement is consistent with NUREG-1431.
17	6.2.1.d	A	Changed “however, they shall” to “however, these individuals shall”	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.
18	6.2.2	A	Reformatted to have subsection title as a numbered item	This is an editorial change to improve the format, functionality and readability of the TS. This change is consistent with NUREG-1431.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
19	6.2.2	A	Changed “The unit staff shall be as follows:” to “The unit staff organization shall include the following:”	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.
19a	6.2.2.a	A	Deleted “Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;” and deleted Table 6.2-1.	Unit staff requirements regarding the required number of licensed operations personnel are stated in 10 CFR 50.54(k), (l), and (m). Because conformance to 10 CFR is a condition of the license, specific identification of this requirement in the TS is duplicative and unnecessary, and therefore Table 6.2-1 is deleted. Additional staffing requirements are clarified in revised substeps 6.2.2.a through 6.2.2.g as discussed below. These changes are consistent with NUREG-1431.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
19b	6.2.2.b	A	Relocated the numerical requirements for RPOs from Table 6.2-1 (Change #32) to 6.2.2.b and stated the requirements as follows: “A total of three non-licensed operators for the two units is required in all conditions. At least one of the required non-licensed operators shall be assigned to each unit. When a unit is operating in MODES 1, 2, 3, or 4, two non-licensed operators are required to be assigned to that unit.”	Current TS Table 6.2-1 delineates the shift crew composition of the Reactor Plant Operator (RPO) with fuel in the reactor. Because 10 CFR CFR 50.54(k), (l), and (m) only state requirements for licensed personnel, this change moves RPO staffing information from current Table 6.2-1 to 6.2.2.a. The proposed change does not change existing TS requirements. The revision also provides editorial changes to improve grammar and readability. This requirement is consistent with NUREG-1431 for a multi-unit plant with two separate control rooms.
20	6.2.2.b	A	Deleted 6.2.2.b regarding operator and senior operator staffing requirements.	The minimum shift crew requirements for licensed operators and senior operators are contained in 10 CFR 50.54 (k), (l), and (m). These requirements do not need to be repeated in the TS since duplication is unnecessary and may result in additional administrative burden. The proposed change is consistent with NUREG-1431.
21	not used			
22	6.2.2.c	R	Changed “Health Physics Technician” to “radiation protection technician” and changed the semicolon to a period.	Refer to Changes # 12 and #16.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
23	6.2.2.c	A	<p>The information regarding the health physics technician in Footnote * was added as a sentence in the existing paragraph and was changed to read:</p> <p>“The position may be vacant for not more than 2 hours in order to accommodate unexpected absence, provided immediate action is taken to fill the required position.”</p>	<p>This is an editorial change to incorporate the existing footnote information into the body of the specification and to improve grammar and readability. This requirement is consistent with NUREG-1431.</p>
24	6.2.2.d	A	Deleted TS 6.2.2.d	<p>This requirement is stated in 10 CFR 50.54(m)(2)(iv). Because conformance to 10 CFR is a condition of the license, specific identification of this requirement in the TS is duplicative and unnecessary. This change is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
25	6.2.2.e	R	Relocated TS 6.2.2.e and associated Footnote * regarding requirements for Fire Brigade composition to the TRM.	The requirements for fire protection systems were relocated to the UFSAR and Fire Hazards Analysis Report from the TS in accordance with Generic Letter 88-12, "Removal of Fire Protection Requirements from the Technical Specifications." The Fire Hazards Analysis Report delineates the commitment to 10 CFR 50, Appendix R, which specifies in Sections III.G and L, staffing requirements relating to the fire brigade and safe shutdown. These requirements do not need to be repeated in the TS. As such, the relocation requirements are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59.
26	6.2.2.f	A	Changed "procedures" to "controls"; changed "Senior Operators" to "SROs"; and changed "Operators" to "ROs"	This is an editorial change incorporating a common acronym. The proposed change is consistent with NUREG-1431.
27	6.2.2.f	A	Changed "auxiliary operators" to "reactor plant operators" and "health physicists" to "radiation protection technicians"	These are an editorial change incorporating plant-specific nomenclature. Refer to changes #12 and #16.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
28	6.2.2.f	A	In the second paragraph deleted “(except for shift technical advisor personnel)”	The revision deletes the parenthetical exclusion of the Shift Technical Advisor to eliminate a possible ambiguity of the requirements since other excluded personnel are not listed. The proposed change is consistent with NUREG-1431.
28a	6.2.2.f	A	Replaced the entire second paragraph, including the four listed guidelines with “The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.	The proposed changes will provide reasonable assurance that impaired performance caused by excessive working hours will not jeopardize safe plant operation. Specific working hour limits are not otherwise required to be in the Technical Specifications under 10 CFR 50.36(c)(5). Specific controls for working hours of reactor plant staff are described in procedures that require a deliberate decision-making process to minimize the potential for impaired personnel performance, and that established procedure control processes will provide sufficient control for changes to that procedure. These proposed changes are consistent with the recommendations in the April 9, 1997 letter from C. Grimes to J. Davis, and NUREG-1431 as modified by NRC-approved TSTF-258.
29	6.2.2.f	R	Changed “Plant Manager” to “plant manager”	Refer to Change # 4.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
30	6.2.2.f	A	<p>Changed</p> <p>“Any deviation from the above guidelines shall be authorized by the Plant Manager or his deputy or by higher levels of management, in accordance with established procedures, and with documentation of the basis for granting the deviation”.</p> <p>to</p> <p>“Any deviation from these guidelines shall be authorized in advance by the plant manager or the plant manager’s designee, in accordance with approved administrative procedures, with documentation of the basis for granting the deviation.”</p>	<p>This is an editorial change made for consistency with NUREG-1431 and for improved readability. The change from “Plant Manager” to “plant manager” is addressed in Change #29 above.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
30a	6.2.2.f	L.6/A	<p>Changed</p> <p>“Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.”</p> <p>to</p> <p>“Controls shall be included in the procedures to require that a periodic independent review be conducted to ensure that excessive hours have not been assigned. Routine deviation from the working hour guidelines shall not be authorized.”</p> <p>and made it a separate paragraph.</p>	<p>Specific details regarding the periodicity of overtime reviews and the personnel required to perform such reviews are outside the scope of information required to be in the Technical Specifications under 10 CFR 50.36. The requirements to perform an independent review of overtime hours and to prohibit routine deviation from working hour guidelines are retained and are consistent with NUREG-1431. Specific controls for the review of overtime are described in procedures that require a deliberate decision-making process to minimize the potential for impaired personnel performance, and established procedure control processes will provide sufficient control for changes to those procedures.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
31	6.2.2.g	R	<p>Replaced the list of required SRO or RO license holders with the statement</p> <p>“The individual to whom the shift managers directly report shall hold an SRO license.”</p>	<p>The intent of this requirement is for the first level of management above the shift managers to hold an SRO license. The title and qualification requirements of the individual fulfilling this function are currently located in the OQAP and the UFSAR. The proposed relocated position title is consistent with NUREG-1431, as modified by NRC approved TSTF-065, Revision 1. The specific title is not required to be in the TS to provide adequate protection of the public health and safety. Changes to the OQAP are controlled by the provisions of 10 CFR 50.54. Changes to the UFSAR are controlled by the provisions of 10 CFR 50.71(e). TS 6.2.2.g currently requires SRO licenses and reactor operator (RO) licenses to be held by specific positions. However, these requirements have been deleted since they duplicate the requirements denoted in 10 CFR 50.54(i), 10 CFR 50.54(l), and 10 CFR 50.54(m)(2)(ii). These requirements do not need to be repeated in the TS since duplication is unnecessary and may result in additional administrative burden.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
32	Table 6.2-1	R	<p>Deleted current TS Table 6.2-1. The information from the Table has either been deleted as unnecessary repetition of regulations or it has been relocated as described below.</p> <p>The minimum shift crew requirements for non-licensed plant operators are relocated to TS 6.2.2.b. (Change # 19b)</p> <p>The control room command function requirements are relocated to TS 6.1.2. (Change # 7)</p> <p>The minimum requirements for licensed SROs and ROs to be present in the control room are deleted from the TS. (Change # 19a)</p> <p>The requirements for the STA are transferred to TS 6.2.2.g. (Change # 36)</p>	<p>The minimum shift crew requirements for licensed operators and senior operators are contained in 10 CFR 50.54 (k), (l), and (m). These requirements do not need to be repeated in the TS since duplication is unnecessary and may result in additional administrative burden. The proposed change is consistent with NUREG-1431. Retained requirements are annotated in the TS markup of Table 6.2-1. Any technical changes to these retained requirements are specifically discussed elsewhere in this Attachment.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
33	Table 6.2-1	A	<p>Deleted</p> <p>“The shift crew composition may be one less than the minimum requirements of Table 6.2-1 for a period...within the minimum requirements of Table 6.2-1.”</p> <p>and relocated the requirement to new TS 6.2.2.b stated as follows:</p> <p>“The shift crew composition may be one less than the minimum requirements of 10 CFR 50.54(m)(2)(i) and Specifications 6.2.2.a and 6.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members, provided immediate action is taken to restore the shift crew composition to within the minimum requirements.”</p>	<p>This requirement has been transferred to new TS 6.2.2.c. The reference to Table 6.2-1 was therefore deleted, and specific references to 10 CFR 50.54 and TS 6.2.2 were added to eliminate any ambiguity of the requirement as it relates to 10 CFR 50.54. No new requirements are being added or deleted. Since the requirements remain the same, the changes are considered to be changes in presentation only. The proposed change is consistent with NUREG-1431.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
34	Table 6.2-1	A	Deleted “The provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.”	TS Table 6.2-1 (new TS 6.2.2.c) currently allows a period of time, not to exceed two hours, in order to accommodate unexpected absence of “on-duty” shift crew members or personnel. The wording “on-duty” implies that the absence refers to on-duty shift crewmembers or personnel and not the oncoming crew or personnel. If anyone in the oncoming crew or personnel is not present, the “on-duty” person may not leave. This change is considered editorial since the requirement being deleted in Table 6.2-1 is duplicate wording and is covered by the requirement being transferred to TS 6.2.2.c (Change # 23). The proposed change is consistent with NUREG-1431.
35	Table 6.2-1	A	Relocated this paragraph to TS 6.1.2.	Refer to Change # 7.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
36	Table 6.2.1 Footnote ***	A	<p>Relocated the information in Table 6.2.1 Footnote *** to TS 6.2.2.f and changed</p> <p>“The STA position shall be manned in MODES 1, 2, 3, and 4 unless the Shift Supervisor or the individual with a Senior Operator license meets the qualifications for the STA as required by the NRC.”</p> <p>to</p> <p>“This position may also be filled by the shift manager or an individual with an SRO license provided that person meets the qualifications specified by the Commission Policy Statement.”</p>	<p>The revision of this requirement provides editorial changes to incorporate the existing footnote information into the discussion relating to the Shift Technical Advisor position and to improve grammar and readability.</p> <p>Also refer to Change #6.</p>
37	6.2.4.1	A	Added “(STA)” after “Shift Technical Advisor”.	This is an editorial change incorporating a common acronym for the Shift Technical Advisor.

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
38	6.2.4.1	A	<p>Relocated the information in TS 6.2.4.1 to TS 6.2.2.g and changed</p> <p>“The Shift Technical Advisor shall have a bachelor’s degree or equivalent in a scientific or engineering discipline and shall have received specific training in the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.”</p> <p>to</p> <p>“In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift (Generic Letter 86-04).”</p>	<p>The change revises the requirement regarding the qualifications of the Shift Technical Advisor. The existing requirement has been replaced with an equivalent commitment referencing the location of specific requirements for the STAs. Such duplication in the TS is unnecessary and results in additional administrative burden to revise the duplicate TS requirement should the NRC Policy Statement be revised. Since the removal of the duplicate information results in no actual technical change in the requirement, this change is considered administrative in nature. The proposed change is consistent with NUREG-1431.</p>
39	New 6.3.1	M	<p>Added new TS 6.3.1</p> <p>“Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, as described in the Operations Quality Assurance Plan.”</p>	<p>This is an additional restriction on plant operation in that it will be controlled through TS. The proposed change is consistent with current licensing basis and NUREG-1431.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
40	6.4	R	Relocated the requirements of TS 6.4, "TRAINING," to the TRM.	<p>These training provisions are adequately addressed by other proposed Specification 6.0 provisions and by regulations. TS 6.3, "Unit Staff Qualifications," provides requirements to ensure adequate, competent staff in accordance with ANSI N18.1-1971. TS 6.2 details unit staff requirements. TS 6.2.2.a, 6.2.2.b, 6.2.2.c, and 10 CFR 50.54 state minimum shift crew requirements. Training and re-qualification of licensed positions is contained in 10 CFR 50.55. Placement of training requirements in the TRM will ensure that training programs are properly maintained in accordance with commitments and regulations. As such, the relocated details are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. The proposed change is consistent with NUREG-1431.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
41	6.5	R	Relocated the requirements denoted in TS 6.5, "REVIEW AND AUDIT" to the OQAP.	<p>These details are beyond the criteria of 10 CFR 50.36(c)(5) for inclusion in the Administrative Controls Section of the TS and are not necessary to adequately describe the regulatory requirement. Therefore, these details can be moved to a licensee controlled document without a significant impact on safety. Placement of these requirements in the OQAP will ensure that these review and audit functions and programs are properly maintained in accordance with commitments and regulations. As such, the relocated details are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the OQAP are controlled by the provisions of 10 CFR 50.54. The proposed change is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
42	6.5.3.1.b and 6.5.3.1.c	R	<p>Change #41 relocated all of TS 6.5 to the OQAP. Change #42 duplicates one sentence each from 6.5.3.1.b and 6.5.3.1.c to be relocated in TS 6.1.1. and combined them as follows:</p> <p>“Proposed modifications to safety-related structures, systems, and components shall be approved by the Plant Manager prior to implementation.”</p> <p>and</p> <p>“Proposed tests and experiments shall be approved by the Plant Manager.”</p> <p>became</p> <p>“The plant manager or the plant manager’s designee shall approve, prior to implementation, each proposed test and experiment that affects nuclear safety and is not described in the UFSAR, and each modification to systems or equipment that affects nuclear safety.”</p>	<p>The specific position of “Plant Manager” is replaced with the generic title “plant manager.” Refer to Change # 4 for justification.</p> <p>The rest is an editorial change to improve the format, functionality and readability of the TS. This change is consistent with NUREG-1431.</p>
43	6.6	A	Deleted Section 6.6 heading and TS 6.6.1.a, and replaced with “Not Used”.	Reportable event requirements of TS 6.6.1.b are being relocated as described below in Change #44. The remainder of Section 6.6 is therefore extraneous and is being deleted.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
44	6.6.1.b	R	Relocated the requirement denoted in TS 6.6.1.b to the OQAP.	TS 6.6.1.b required a review of REPORTABLE EVENTS by the PORC. These details are beyond the criteria of 10 CFR 50.36(c)(5) for inclusion in the Administrative Controls Section of the TS and are not necessary to adequately describe the actual regulatory requirement. Therefore, these details can be moved to a licensee-controlled document without a significant impact on safety. Placement of these requirements in the OQAP will ensure that these review and audit functions and programs are properly maintained in accordance with commitments and regulations. As such, the relocated details are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the OQAP are controlled by the provisions of 10 CFR 50.54. The proposed change is consistent with NUREG-1431.

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
45	6.7.1	A	Deleted the title of TS 6.7 and the details in TS 6.7.1 and relocated the remaining requirements to the OQAP as described in Change # 46.	These requirements are removed from TS since they duplicate the requirements of 10 CFR 50.36, 50.72, and 50.73. Such duplication is unnecessary and results in additional administrative burden to revise the duplicate TS when the regulations are revised. Since removal of the duplication results in no actual technical change in the requirements, the removal is considered an administrative change. This change is consistent with NUREG-1431.
46	6.7.1.a, 6.7.1.b, 6.7.1.c	L.7/A	Deleted the reporting and review requirements of the Safety Limit Violation as they pertain to Station Management, PORC, and NSRB. Deleted unnecessary detail.	These details are beyond the criteria of 10 CFR 50.36(c)(5) for inclusion in the Administrative Controls Section of the TS and are not necessary to adequately describe the regulatory requirements for exceeding a safety limit as specified in 10 CFR 50.36(c)(1). PORC and NSRB review requirements are already detailed in TS 6.5.1 and 6.5.2 and are being relocated to the OQAP as described in Change #41. The one-hour notification and 14-day reporting requirements are unnecessarily restrictive compared to the actual requirements of 10 CFR 50.72 and 50.73. Therefore, these details can be deleted without a significant impact on safety. The proposed change is consistent with NUREG-1431.

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
46a	6.7.1.d	A	TS 6.7.1.d is being deleted and the requirement to comply with 10 CFR 50.36(c)(1), which includes obtaining Commission authorization prior to resuming unit operation, is being added to TS 2.1.1 and 2.1.2.	The information in TS 6.7.1 is being deleted as described in Change #45 and #46 above, and the reference to TS 6.7.1 is being deleted from TS 2.1.1 and 2.1.2 as described in Change #127. Although not required as necessary detail by 10 CFR 50.36(c)(5) or by NUREG-1431, the reference to 10 CFR 50.36(c)(1) is added to TS 2.1.1 and 2.1.2, in order to ensure that notification, reporting and unit restart authorization requirements associated with exceeding a safety limit are clearly identified.
47	6.8	A	Changed "PROCEDURES AND PROGRAMS" to "Procedures, Programs, and Manuals"	This is an editorial change to improve the format, functionality and readability of the TS.
48	6.8.1.c and 6.8.1.d	A	Deleted the requirements of TS 6.8.1.c and 6.8.1.d regarding implementation of a Security Plan and an Emergency Plan.	The implementing procedures for these programs are also required by 10 CFR 50.54(p) and 10 CFR 50, Appendix E. Since conformance with 10 CFR Chapter 1 is a license condition and the Security Plan and Emergency Plan are required to be implemented by 10 CFR Chapter 1, specific identification of these plans is unnecessary. This is a change in the presentation of the requirements only and, therefore, is considered an editorial change. The proposed change is consistent with NUREG-1431.

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
49	6.8.1.e	R	Relocated the requirement in TS 6.8.1.e for implementing the Process Control Program (PCP) to the TRM.	<p>The PCP implements the requirements of 10 CFR 20, 10 CFR 61, and 10 CFR 71. Compliance with these regulations is required by the Operating Licenses, and procedures would be the method to ensure compliance with the program. As such, relocation of the procedure requirements of the PCP from the TS does not affect the safe operation of the facility. Therefore, the relocated details are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. The proposed change is consistent with NUREG-1431.</p>
50	6.8.1.f	A	Deleted the requirement in TS 6.8.1.f for implementing written procedures for the Offsite Dose Calculation Manual.	<p>A more generic requirement (new TS 6.8.1.e) has been added which requires this activity for all Programs and Manuals (Change #51). Therefore, it is not necessary to specifically identify each program. Since the requirements remain, this is considered to be a change in the method of presentation only and, therefore, is considered an editorial change. The proposed change is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
51	New 6.8.1.e	M	Added new TS 6.8.1.e: “Programs and Manuals specified in Specification 6.8.3.”	New TS 6.8.1.e is added to ensure all programs and manuals specified in TS 6.8.3 have written procedures. This will ensure proper procedure control of TS required programs. This is an additional restriction on plant operation in that it will be controlled through TS.
52	6.8.2	R	Relocated the details of procedure reviews and approvals in TS 6.8.2 to the OQAP.	The ability to relocate these requirements is based on existing regulations and standards that contain these provisions such that duplication in the TS is not necessary. Placement of these requirements in the OQAP will ensure that these review and approval functions are properly maintained in accordance with commitments and regulations. As such, the relocated details are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the OQAP are controlled by the provisions of 10 CFR 50.54. The proposed change is consistent with NUREG-1431.
53	6.8.3	A	Added “and manuals” after “programs”	This is an editorial change to improve the format, functionality and readability of the TS. This requirement is consistent with NUREG-1431.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
NA	6.8.3.a 6.8.3.d	NA	Note to Reviewer: STP has submitted a separate License Amendment Request to remove references to the Post Accident Sampling System from the Technical Specifications, in letter NOC-AE-01000986, dated 8/2/2001. This separate License Amendment Request proposes to revise Specifications 6.8.3.a and 6.8.3.d.	NA
54	6.8.3.a	A	<p>Changed</p> <p>“A program to reduce leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to as low as practical levels. The systems include the containment spray, Safety Injection...”</p> <p>to</p> <p>“This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include containment spray, safety injection...”</p>	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
55	6.8.3.b	R	Relocated the details for In-Plant Radiation Monitoring in TS 6.8.3.b to the TRM.	This program contains controls to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program is designed to minimize radiation exposure to plant personnel post-accident and has no impact on nuclear safety or the health and safety of the public. Additionally, these details are beyond the criteria of 10 CFR 50.36(c)(5) for inclusion in the Administrative Controls Section of the TS. Therefore, the relocated details are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. The proposed change is consistent with NUREG-1431.
56	6.8.3.c	A	<p>Changed</p> <p>“A program for monitoring of secondary water...”</p> <p>to</p> <p>“This program provides controls for monitoring secondary water...”</p>	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.
57	Not used			

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
58	6.8.3.e	R	Relocated the details contained in TS 6.8.3.e for Accident Monitoring Instrumentation to the TRM.	<p>This program contains controls to ensure the capability to monitor plant variables and systems operating status during and following an accident. This program is designed to include those instruments provided to indicate system operating status and furnish information regarding the release of radioactive materials (Category 2 and 3 instrumentation as defined in Regulatory Guide 1.97, Revision 2). The requirements for Category 1 and Type A instruments are retained in TS 3/4.3.3.6. Category 2 and 3 instruments are not necessary for inclusion within the TS. Additionally, these details are beyond the criteria of 10 CFR 50.36(c)(5) for inclusion in the Administrative Controls Section of the TS. Therefore, the relocated details are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. The proposed change is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
59	6.8.3.f	R/A	<p>Relocated the details contained in TS 6.8.3.f regarding component cyclic or transient limit to UFSAR Section 3.9.1 and changed</p> <p>“The Component Cyclic and Transient Limit Program provides controls to track cyclic/transient plant conditions to assure that the cumulative fatigue usage factor does not exceed 1.0 for those components for which fatigue analysis was performed in accordance with Section III of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code. The cyclic and transient limits used in the design are identified in the Updated Final Safety Analysis Report.”</p> <p>to</p> <p>“This program provides controls to track the UFSAR Section 3.9.1 cyclic/transient plant conditions to assure that the components are maintained within the design limits.”</p>	<p>The program requirements are being maintained in the TS; only the specific details of the design limits are being relocated to the UFSAR. The relocated details are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the UFSAR will be controlled by the provisions of 10 CFR 50.59. The proposed change is consistent with NUREG-1431.</p> <p>Additionally, the revision of this requirement provides editorial changes to improve grammar and readability. This requirement is consistent with NUREG-1431.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
60	6.8.3.g	A	<p>Changed</p> <p>“A program shall be provided conforming with 10 CFR 50.36a for ... The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial...”</p> <p>to</p> <p>“This program conforms to 10 CFR 50.36a for ... The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial...”</p>	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.
61	6.8.3.g.1)	A	Changed “Limitations on the operability...” to “Limitations on the functional capability...”	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.
62	6.8.3.g.2)	A	<p>Changed</p> <p>“...conforming to 10 times 10 CFR Part 20.1001-20.2401, Appendix B, Table 2, Column 2,”</p> <p>to</p> <p>“...conforming to ten times the concentration values in 10 CFR 20, Appendix B, Table 2, Column 2;”</p>	This is an editorial change to improve grammar and readability. The change to the subpart reference to 10 CFR 20 is a more appropriate reference to the appendix, table, and column references and the change is considered an editorial change. This requirement is consistent with NUREG-1431.

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
63	6.8.3.g.4)	A	<p>Changed</p> <p>“Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from the radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,”</p> <p>to</p> <p>“Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC at or beyond the SITE BOUNDARY from the radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to 10 CFR 50 Appendix I;”</p>	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.
64	6.8.3.g.6)	A	<p>Changed</p> <p>“Limitations on the operability and use... projected doses in a 31-day period would exceed... dose commitment conforming to Appendix I to 10 CFR Part 50,”</p> <p>to</p> <p>“Limitations on the functional capability and use... projected doses in a period of 31 days would exceed... dose commitment conforming to 10 CFR 50, Appendix I;”</p>	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
65	6.8.3.g.8) 6.8.3.g.9)	A	Changed “...to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,” to “...to areas at or beyond the SITE BOUNDARY conforming to 10 CFR 50, Appendix I;”	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.
66	Not used			
67	6.8.3.g.10)	A	Changed “40 CFR Part 190” to “40 CFR 190”	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
68	6.8.3.h	R	Relocated the details contained in TS 6.8.3.h regarding the Radiological Environmental Monitoring Program to the ODCM.	<p>This program delineates the requirements for monitoring the radiation and radionuclides in the environs of the plant. The requirements for this program conform to the requirements of 10 CFR 50, Appendix I and provide an equivalent level of regulatory control such that the details do not need to be duplicated in the TS.</p> <p>Additionally, these details are beyond the criteria of 10 CFR 50.36(c)(5) for inclusion in the Administrative Controls Section of the TS to ensure safe operation of the facility. The relocated details are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the ODCM are controlled by the provisions of TS 6.8.3.1, thus ensuring that any changes to the requirements are appropriately reviewed. The proposed change is consistent with NUREG-1431.</p>
69	6.8.3.i.a	A	<p>Changed</p> <p>“Acceptability of new fuel oil for use prior to addition to storage tanks by determining that the fuel oil has:”</p> <p>to</p> <p>“Acceptability of new fuel oil prior to addition to the diesel generator fuel oil storage tanks by determining that the fuel oil has.”</p>	<p>This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
70	6.8.3.i.b	L.1/A	<p>Changed</p> <p>“Other properties for ASTM 2D fuel oil are within limits within 30 days following sampling and addition to storage tanks; and”</p> <p>to</p> <p>“Within 31 days following addition of new fuel oil to the diesel generator fuel oil storage tanks, verify that the properties of the new fuel oil, other than those addressed in 6.8.3.i.1 above, are within limits for ASTM 2D fuel oil; and”</p>	<p>The proposed change is reasonable based upon the relatively small increase in time and the probability of a major problem being identified that would prevent the diesel generator (DG) from performing its intended safety function. In addition, the requirement evaluates properties that would not have an immediate effect on the DG operation and are typically associated with contamination or fuel oil degradation as a result of long-term storage. A failure to satisfy these criteria does not mean the fuel oil will not burn properly in the DG. The proposed change is consistent with NUREG-1431.</p> <p>Additionally, the revision of this requirement provides editorial changes to improve grammar and readability. This requirement is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
71	6.8.3.i.c	A	<p>Added a clarifying statement:</p> <p>“The provisions of Surveillance Requirements 4.0.2 and 4.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies.”</p>	<p>This statement clarifies the allowance for surveillance frequency extension and delay in entering the LCO when a surveillance is missed. This change is necessary since the testing requirements are denoted in a Section of TS where the surveillance requirement statements of applicability are generally not applied. The associated testing and frequencies were moved from TS 3/4.8 in Amendment 68 for Unit 1 and Amendment 57 for Unit 2. Prior to these Amendments, TS 4.0.2 and TS 4.0.3 were applicable allowances since the Amendment request did not justify removal of these allowances. Specifically denoting these allowances in TS 6.8.3.i is considered a change of presentation only and not a technical change (either actual or interpretational). The proposed change is consistent with NUREG-1431, as modified by NRC approved TSTF-118.</p>
71a	6.8.3.j	A	<p>Changed “to implement the leakage rate testing...” to read “to implement leakage rate testing...” and changed “10 CFR Part 50...” to read “10 CFR 50...”</p>	<p>This is an editorial change to improve grammar and readability.</p>
72	6.8.3.j	A	<p>Changed “primary containment” to “containment”</p>	<p>This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
73	6.8.3.j.b	A	Changed “test intervals” to “test frequencies”	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.
74	6.9.1	A	<p>Changed</p> <p>“In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator of the Regional Office of the NRC unless otherwise noted.”</p> <p>to</p> <p>“The following reports shall be submitted in accordance with 10 CFR 50.4.”</p>	This is an editorial change to improve the format, functionality and readability of the TS. This change is consistent with NUREG-1431.
75	6.9.1.1	R	Relocated the requirements of the Startup Report to the TRM.	<p>This report does not contribute to the safe operation of the facility, therefore, it need not be included in the TS.</p> <p>Additionally, these details are beyond the criteria of 10 CFR 50.36(c)(5) for inclusion in the Administrative Controls Section of the TS to ensure safe operation of the facility.</p> <p>Therefore, the relocated details are not required to be in the TS to provide adequate protection of the public health and safety.</p> <p>The TRM is incorporated by reference into the UFSAR. As such, the provisions of 10 CFR 50.59 will control changes to the TRM. This change is consistent with NUREG-1431.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
76	6.9.1.2 6.9.1.2.a	L.2	<p>Changed</p> <p>“Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year.”</p> <p>to require that the Occupational Radiation Exposure Report be</p> <p>“...submitted by April 30 of each year.”</p>	<p>This change is consistent with previous comprehensive revisions to 10 CFR Part 20. This report is provided to supplement the information required by 10 CFR 20.2206(b), which is filed on or before April 30 in accordance with 10 CFR 20.2206(c). The supplemental information report submittal date is therefore revised to correspond to the required submittal date of the report being supplemented. This change is consistent with NUREG-1431.</p>
77	6.9.1.2	A	<p>Deleted</p> <p>“The initial report shall be submitted prior to March 1 of the year following initial criticality.”</p>	<p>This is an editorial change to delete information that has expired since the plant has previously reached initial criticality. This change is consistent with NUREG-1431.</p>
78	6.9.1.2.a Footnote *	A	<p>Changed footnote *</p> <p>“A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.”</p> <p>to a NOTE within the body of TS 6.9.1.2.a, stating</p> <p>“A single submittal may be made for the South Texas Project. The submittal should combine sections that are common to both units.”</p>	<p>This is a change in the presentation of the requirements only and, therefore, is considered an editorial change. This change is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
79	6.9.1.2.a Footnote **	A	<p>Changed</p> <p>“A tabulation on an annual basis of the number of station, utility, and other individuals, for whom monitoring was required, (including contractors) receiving exposures greater than 100 mrem in one calendar year and their associated man-rem exposure according to work and job functions** (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). The dose assignments to various duty functions may be estimated based on pocket dosimeter, thermoluminescent dosimeter (TLD), or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole-body dose received from external sources should be assigned to specific major work functions; and”</p> <p>** This tabulation supplements the requirements of §20.2206 of 10 CFR Part 20.</p>	<p>TS 6.9.1.2.a provides a description of the annual occupational dose reporting requirements. Editorial changes are made consistent with the 10 CFR Part 20 changes in nomenclature for describing the dose. These changes do not revise the actual requirements and are therefore, editorial in nature. Additionally, the change regarding the pocket dosimeter clarifies that either a pocket ionization chamber or a pocket electronic dosimeter can be used since either is currently allowed by the TS. This change is for clarification only and does not revise the actual requirement. These changes are consistent with NUREG-1431, as modified by NRC approved TSTF-152.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
79	6.9.1.2.a	A	<p>(Continued) to</p> <p>“This report provides a tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was required, receiving an annual deep dose equivalent greater than 100 mrems and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance, waste processing, and refueling). The tabulation may include individuals for whom monitoring was provided but not required. This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescent dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling less than 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.”</p>	

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
80	6.9.1.2 6.9.1.2.b	A	Deleted the requirements of TS 6.9.1.2.b regarding reporting requirements when primary coolant specific activity exceeds the limits.	Existing TS 3.4.8 delineates actions required based on primary coolant activity levels. Should primary coolant activity levels indicate that a primary safety barrier (i.e., fuel cladding) is seriously degraded, then reporting of the condition is required by 10 CFR 50.73. Furthermore, NUREG-1431 does not require information regarding primary coolant activity levels to be included as part of the Occupational Radiation Exposure Report.
81	6.9.1.3 Footnote *	A	<p>Changed Footnote *</p> <p>“A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.”</p> <p>to a NOTE within the body of TS 6.9.1.3 stating</p> <p>“A single submittal may be made for the South Texas Project. The submittal should combine sections that are common to both units.”</p>	This is a change in the presentation of the requirements only and, therefore, is considered an editorial change. This change is consistent with NUREG-1431.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
82	6.9.1.3	L.3/A	<p>Changed</p> <p>“Routine Annual Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 1 of each year.”</p> <p>to</p> <p>“The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted prior to May 15 of each year.”</p>	<p>This is an interval increase of 14 days. There is no requirement for the NRC to approve this report and 10 CFR 50 does not specify a specific reporting date. This change is consistent with the recommendations of NUREG-1431. Report completion and submittal is clearly not necessary to assure operation in a safe manner for the increased interval. Therefore, this change has no impact on the safe operation of the plant.</p> <p>Additionally, the revision of this requirement provides editorial changes to improve grammar and readability. This requirement is consistent with NUREG-1431.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
83	6.9.1.3	A	<p>Changed</p> <p>“The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.”</p> <p>to</p> <p>“The report shall include summaries, interpretations, and analysis of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM) and 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.”</p>	<p>This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
84	6.9.1.4 Footnote **	A	<p>Changed Footnote **</p> <p>“A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.”</p> <p>to a NOTE within the body of TS 6.9.1.4 stating</p> <p>“A single submittal may be made for the South Texas Project, which shall specify the releases of radioactive material from each unit.”</p>	<p>This is a change in the presentation of the requirements only and, therefore, is considered an editorial change. This change is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
85	6.9.1.4	L.4/A	<p>Changed</p> <p>“Routine Annual Radioactive Effluent Release Reports covering the operation of the unit during the previous 12 months of operation shall be submitted within 60 days after January 1 of each year.”</p> <p>to</p> <p>“The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted by May 1 of each year.”</p>	<p>This is an interval increase of approximately 60 days. This change is consistent with 10 CFR 50.36a, which does not specify a specific reporting date. This change is consistent with the recommendations of NUREG-1431. Report completion and submittal is clearly not necessary to assure operation in a safe manner for the increased interval. Therefore, this change has no impact on the safe operation of the plant.</p> <p>Additionally, the revision of this requirement provides editorial changes to improve grammar and readability. This requirement is consistent with NUREG-1431.</p>
86	6.9.1.4	A	<p>Changed</p> <p>“The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.”</p> <p>to</p> <p>“The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program, and be in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.”</p>	<p>This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
87	6.9.1.5	A	<p>Changed</p> <p>“...challenges to the PORVs or safety valves, shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office of the NRC, no later than the 15th of each month following the calendar month covered by the report.”</p> <p>to</p> <p>“...challenges to the pressurizer power operated relief valves or pressurizer safety valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.”</p>	<p>The requirement specifying where a report to the NRC is sent has been removed since it is superceded by the requirements of 10 CFR 50.4. Duplication is unnecessary and results in additional administrative burden to revise the duplicate TS requirement when the regulations are revised. Since removal of the duplication results in no actual change in the requirements, removal of the duplicative information is considered an editorial change. Additionally, the revision of this requirement provides editorial changes to improve grammar and readability. This requirement is consistent with NUREG-1431.</p>

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
88	6.9.1.6.a	A	<p>Changed</p> <p>“Core operating limits shall be established and documented in the CORE OPERATING LIMITS REPORT before each reload cycle, or any part of a reload cycle for the following:”</p> <p>to</p> <p>“Core operating limits shall be established prior to each reload cycle or prior to any remaining portion of a reload cycle. The core operating limits shall be documented in the COLR for the following:”</p>	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.
88a	6.9.1.6.a	A	<p>Changed</p> <p>“The CORE OPERATING LIMITS REPORT shall be maintained...” to</p> <p>“The COLR shall be maintained...”</p>	This is an editorial change to improve grammar and readability.
89	6.9.1.6.b	A	<p>Changed:</p> <p>“... reviewed and approved by the NRC in:”</p> <p>to</p> <p>“... reviewed and approved by the NRC, specifically those described in the following documents:”</p>	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
90	6.9.1.6.b.	A	Changed titles of specific reports to "title case" lettering, corrected titles to reflect the actual documents, spelled out "South Texas Project Electric Generating Station," and corrected punctuation.	This is an editorial change to improve readability.
91	6.9.1.6.c	A	Changed "ECCS" to "Emergency Core Cooling Systems (ECCS)"	This is an editorial change to improve grammar and readability.
92	6.9.1.6.c	A	Changed <p>"...margin, and transient and accident analysis..."</p> <p>to</p> <p>"margin, transient analysis limits, and accident analysis..."</p>	This is an editorial change to improve grammar and readability.
93	6.9.1.6.d	A	Changed <p>"The CORE OPERATING LIMITS REPORT, including any mid-cycle revisions or supplements thereto, shall be provided..."</p> <p>to</p> <p>"The COLR, including any mid-cycle revisions or supplements, shall be provided..."</p>	This is an editorial change to improve grammar and readability.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
94	6.9.1.6.d	A	Changed: “... to the NRC Document Control Desk, with copies to the Regional Administrator and Resident Inspector.” to “... to the NRC.”	The requirement specifying where a report to the NRC is sent has been removed since it is superseded by the requirements of 10 CFR 50.4. Duplication is unnecessary and results in additional administrative burden to revise the duplicate TS requirement when the regulations are revised. Since removal of the duplication results in no actual change in the requirements, removal of the duplicative information is considered and editorial change. This requirement is consistent with NUREG-1431.
95	6.9.2	A	Deleted the requirements of TS 6.9.2 for “SPECIAL REPORTS”	The requirement specifying where a report to the NRC is sent has been removed since it is superseded by the requirements of 10 CFR 50.4. Duplication is unnecessary and results in additional administrative burden to revise the duplicate TS requirement when the regulations are revised. Since removal of the duplication results in no actual change in the requirements, removal of the duplicative information is considered and editorial change. Additionally, the revision of this requirement provides editorial changes to improve grammar and readability. This requirement is consistent with NUREG-1431.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
96	6.10	R	Relocated the details contained in TS 6.10, "Record Retention," to the OQAP.	<p>These details are beyond the criteria of 10 CFR 50.36(c)(5) for inclusion in the Administrative Controls Section of the TS and are not necessary to adequately describe the actual regulatory requirement. Record retention requirements are also located in 10 CFR 50, Appendix B, 10CFR 20, and 10 CFR 50.71. Therefore, these details can be moved to a licensee controlled document without a significant impact on safety. Placement of these requirements in the OQAP will ensure that any changes to these requirements will be appropriately reviewed. These requirements do not ensure the facility is operated in a safe manner and as such, the relocated details are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the OQAP are controlled by the provisions of 10 CFR 50.54. The proposed change is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
97	6.11	A	Deleted the details contained in TS 6.11, "Radiation Protection Program."	These requirements duplicate the requirements of 10 CFR 20. Such duplication is unnecessary and results in additional administrative burden to revise the duplicate TS when these regulations are revised. Since deletion of the duplication results in no actual change in the requirements, this is considered an editorial change. The proposed change is consistent with NUREG-1431.
98	6.12.1	A	Changed "Pursuant to paragraph 20.1601(c) of 10 CFR Part 20, in lieu of the "control device" or "alarm signal" required by paragraph 20.1601(a)... defined in 10 CFR Part 20..." to "Pursuant to 10 CFR 20.1601(c), in lieu of the requirements of 20.1601(a)... defined in 10 CFR 20..."	This is an editorial change to improve grammar and readability. This requirement is consistent with NUREG-1431.
99	6.12.1	A	Changed "... radiation is equal to or less than 1000 mRem/h..." to "... radiation is greater than 100 mrem/h but equal to or less than 1000 mrem/h..."	The details contained in TS 6.12.1 are revised consistent with the 10 CFR 20.1003 definition of a "High Radiation Area." Since addition of these details results in no actual change in the requirements, this is considered an editorial change. The proposed change is consistent with NUREG-1431.

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
100	6.12.1	A	<p>Changed</p> <p>“... shall be controlled by requiring issuance of a Radiation Work Permit (RWP).”</p> <p>to</p> <p>“... shall be controlled by Radiation Work Permit (RWP).”</p>	This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.
101	6.12.1	A	<p>Changed</p> <p>“... areas with dose rates equal to or less than 1000 mRem/h...”</p> <p>to</p> <p>“... areas with radiation levels equal to or less than 1000 mrem/h...”</p> <p>and changed</p> <p>“Health Physics Technican”</p> <p>to</p> <p>“radiation protection technician”</p>	This is an editorial change to improve grammar and readability, and to revise organizational titles to be consistent with STP terminology.
101 a	6.12.1	A	Created a new paragraph in the existing text.	This is an editorial change to improve grammar and readability.
102	6.12.1.a 6.12.1.b	A	Changed “; or” to “.”	This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
103	6.12.1.c	L.5	<p>Changed</p> <p>“... frequency specified by the health physics supervision in the RWP.”</p> <p>to</p> <p>“... frequency specified in the RWP.”</p>	<p>The requirement of TS 6.12.1.c pertains to the individual qualified in radiation protection responsible for providing control over the activities in a high radiation area including the performance of periodic radiation surveillances. The responsibility for specifying surveillance frequency in the RWP is not pertinent to the requirements for entering a high radiation area. RWP details are controlled by plant procedures. Deleting these details eliminates ambiguity in the TS and possible misinterpretation of the TS requirements.</p>
104	6.12.2	L	<p>Changed</p> <p>“...shall be provided with locked doors to prevent unauthorized entry, and the keys shall ...”</p> <p>to</p> <p>“...shall be provided with locked or continuously guarded doors to prevent unintentional entry. The keys to the doors shall ...”</p>	<p>A guard has been determined to be an equivalent constraint for prevention of unauthorized entry into such areas. Therefore, this change does not significantly reduce the required controls, and provides an additional option for preventing unnecessary radiation exposure. The proposed change is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
105	6.12.2	A	<p>Changed</p> <p>“... Shift Supervisor on duty and/or health physics supervision.”</p> <p>to</p> <p>“... shift manager on duty or radiation protection.”</p>	<p>This is an editorial change to improve grammar and readability, and to revise organizational titles to be consistent with STP terminology.</p> <p>Also refer to Change #6.</p> <p>The proposed changes are consistent with NUREG-1431.</p>
106	6.12.2	A	<p>Changed</p> <p>“...approved RWP which shall specify the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area.”</p> <p>to</p> <p>“...approved RWP. Prior to entry, individuals shall be informed of the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area, or be accompanied by an individual qualified in radiation protection procedures with a radiation dose rate monitoring device.”</p>	<p>This change, which is consistent with NUREG-1431, allows continuous coverage into areas where dose rates cannot be established prior to entry.</p>
107	6.12.2	A	<p>Changed “...stay time specification of the RWP, ...” to “...stay time specification, ...”</p>	<p>This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
108	6.12.2	A	<p>Changed</p> <p>“For isolated high radiation areas accessible to personnel with radiation levels of greater than 1000 mRem/h at 30 cm (12 in.) but less than 500 Rads at one hour at one meter that are...”</p> <p>to</p> <p>“For individual high radiation areas with radiation levels greater than 1000 mrem/h, accessible to personnel, that are...”</p>	<p>The details contained in TS 6.12.2 are revised to be consistent with the requirements of 10 CFR 20. Specific details have also been deleted since they duplicate the requirements of 10 CFR 20. Such duplication is unnecessary and results in additional administrative burden to revise the duplicate TS when these regulations are revised. Since deletion of the duplication results in no actual change in the requirements, this is considered an editorial change. The proposed change is consistent with NUREG-1431.</p>
109	6.12.2	A	<p>Changed “...such as PWR containment, ...” to “...such as reactor containment, ...”</p>	<p>This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.</p>
110	6.12.2	A	<p>Changed</p> <p>“...purposes of locking, and where no enclosure...”</p> <p>to</p> <p>“...purposes of locking, or that cannot be continuously guarded, and where no enclosure...”</p>	<p>A guard has been determined to be an equivalent constraint for prevention of unauthorized entry into such areas. Therefore, this change does not significantly reduce the required controls, and provides an additional option for preventing unnecessary radiation exposure. The proposed change is consistent with NUREG-1431.</p>
111	6.12.2	A	<p>Changed “isolated area” to “individual area” in two places</p>	<p>This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
112	6.13	R	Relocated the requirements in TS 6.13 for the Process Control Program (PCP) to the TRM.	The PCP implements the requirements of 10 CFR 20, 10 CFR 61, and 10 CFR 71. Compliance with the regulations is required by the STPNOC Operating Licenses, and procedures ensure compliance with the program. As such, relocation of the procedure requirements of the PCP from the TS does not affect the safe operation of the facility. Therefore, the relocated details are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. The proposed change is consistent with NUREG-1431.
113	6.14	A	<p>Changed</p> <p>“Changes to the ODCM:</p> <p>a. Shall be documented and records of reviews performed shall be retained as specified by Specification 6.10.3.o.”</p> <p>to</p> <p>“Licensee-initiated changes to the ODCM:</p> <p>a. Shall be documented and records of reviews performed shall be retained.”</p>	This is an editorial change to improve grammar and readability. Reference to TS 6.10.3.o is deleted because TS 6.10 was relocated to the OQAP (see Change #96). The proposed change is consistent with NUREG-1431.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
114	6.14.a.1)	A	Changed “change” to “changes” and “change(s)” to “changes”.	This is an editorial change to improve grammar and readability.
115	6.14.a.2)	A	Changed “...change will maintain the level...” to read “...changes maintain the levels...”	This is an editorial change to improve grammar and readability.
116	6.14.a.2)	A	Changed “...40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact...” to “40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and do not adversely impact...”	This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
117	6.14.b	R	Relocated TS 6.14 to TS 6.8.3.1 except for the details contained in TS 6.14.b regarding the ODCM review and acceptance by PORC. These details were relocated to the OQAP by Change #41 (See TS 6.5.1.6.1).	See Change #41 for justification for relocating TS 6.5 (including details about the ODCM) to the OQAP. The details regarding PORC review are beyond the criteria of 10 CFR 50.36(c)(5) for inclusion in the Administrative Controls Section of the TS and are not necessary to adequately describe the actual regulatory requirement. Therefore, these details can be moved to a licensee-controlled document without a significant impact on safety. Placement of these requirements in the OQAP will ensure that these review and acceptance functions are properly maintained in accordance with commitments and regulations. As such, the relocated details are not required to be in the TS to provide adequate protection of the public health and safety. The provisions of 10 CFR 50.54 control changes to the OQAP. The proposed change is consistent with NUREG-1431.
118	6.14.b	R	Changed "Plant Manager" to "plant manager"	See Change #4.
119	6.14.c	A	Changed "Commission" to "NRC"	This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
120	6.14.c	A	Changed “Annual Radioactive Effluent Release Report” to “Radioactive Effluent Release Report”	This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.
121	6.14.c	A	Changed “(e.g., month/year)” to “(month and year)”	This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.

The following changes result from the changes made in Section 6 of the Technical Specifications.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
122	1.19	A	Relocated the definition of “OFFSITE DOSE CALCULATION MANUAL” to TS 6.8.3.1	This definition is a description of the ODCM which is part of the discussion of “Procedures, Programs, and Manuals” section of the Administrative Controls. No technical changes (either actual or interpretational) are involved with the move of these requirements to TS 6.8.3.1. As such, this is an editorial change to improve the presentation preference of the requirement. The proposed change is consistent with NUREG-1431.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
123	1.19	A	Changed "Alarm/Trip Setpoints" to "alarm and trip setpoints"	This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.
124	1.19	A	Changed "conduct of the Environmental Radiological Monitoring Program." to "conduct of the radiological environmental monitoring program; and 2)"	This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
125	1.19	A	<p>Changed</p> <p>“The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.3 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Annual Radioactive Effluent Release Reports required by Technical Specifications 6.9.1.3 and 6.9.1.4.”</p> <p>to</p> <p>“The ODCM shall also contain descriptions of the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and the Radiological Effluent Release Report required by Specifications 6.9.1.3 and 6.9.1.4.”</p> <p>and made it a separate paragraph.</p>	<p>This is an editorial change to improve grammar and readability. The proposed change is consistent with NUREG-1431.</p>

#	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
126	1.24	R	Relocated the definition requirements of the Process Control Program (PCP) to the TRM.	This is consistent with the requirements in TS 6.0 being relocated to the TRM. The PCP implements the requirements of 10 CFR 20, 10 CFR 61, and 10 CFR 71. Compliance with these regulations is required by the Operating Licenses, and procedures would be the method to ensure compliance with the program. As such, relocation of the procedure requirements of the PCP from the TS does not affect the safe operation of the facility. Therefore, the relocated details are not required to be in the TS to provide adequate protection of the public health and safety. Changes to the TRM will be controlled by the provisions of 10 CFR 50.59. The proposed change is consistent with NUREG-1431.
127	2.1.1 2.1.2	A	Delete references to TS 6.7.1	TS 6.7.1 regarding the actions to be taken in the event a Safety Limit is violated has been deleted (Change #45 and #46). Therefore, all references to TS 6.7.1 are deleted.
128	3.1.1.3 3.3.3.5 Table 3.3-10 3.3.3.11 4.4.5.5 3.4.9.3 3.5.2 3.5.3.1 3.6.1.6	A	Delete references to TS 6.9.2	TS 6.9.2 regarding Special Reports has been deleted (Change #95). Therefore, all references to Specification 6.9.2 are deleted. This requirement is consistent with NUREG-1431.

<u>#</u>	<u>Affected Sections</u>	<u>Change Type</u>	<u>Description of Change</u>	<u>Reason / Justification for Change</u>
129	3.8.1.1.g	M	Adds new Action, which states: “With one or more diesel generator fuel oil storage tanks with stored fuel oil total particulates not within the Diesel Fuel Oil Testing Program limits, within 7 days restore the fuel oil total particulates within limits, or declare the associated standby diesel generator(s) inoperable”.	The current STP Technical Specifications do not require a standby diesel generator to be declared inoperable if fuel oil properties cannot be restored within limits within a certain time period, although plant procedures do. This action is added in order to make STP Technical Specifications consistent with NUREG-1431 requirements.
130	3.8.1.1.h	M	Adds new Action, which states: “With one or more diesel generator fuel oil storage tanks with new fuel oil properties not within the Diesel Fuel Oil Testing Program limits, within 30 days restore the fuel oil properties within limits, or declare the associated standby diesel generator(s) inoperable”.	The current STP Technical Specifications do not require a standby diesel generator to be declared inoperable if fuel oil properties cannot be restored within limits within a certain time period, although plant procedures do. This action is added in order to make STP Technical Specifications consistent with NUREG-1431 requirements.

5.0 REGULATORY ANALYSIS

5.1 NO SIGNIFICANT HAZARDS DETERMINATION

5.1.1 ADMINISTRATIVE CHANGES

The proposed changes designated as “Administrative” (A) are non-technical changes that involve reformatting, renumbering, and rewording of TS with no change in intent. These changes are considered editorial and administrative in nature because they do not involve technical changes to the TS. These changes are related to the relocation of TS requirements within the current TS or to the modification of wording that does not effect the technical content of the current TS. These changes also include non-technical modifications of requirements to provide consistency with the Improved Standard Technical Specifications recommended in NUREG-1431, “Standard Technical Specifications, Westinghouse Plants.” These changes also include non-technical modifications of requirements to conform to the Writer's Guide associated with NUREG-1431, where certain wording preferences, document formats, or English language conventions were adopted. Administrative changes are not intended to add, delete, or relocate any technical requirements of the current TS. The proposed changes include Items 1a, 1b, 2, 3, 5, 6, 7, 8, 9, 10, 11, 14, 16, 17, 18, 19, 19a, 19b, 20, 21, 23, 24, 26, 27, 28, 30, 33, 34, 35, 36, 37, 38, 43, 45, 48, 50, 53, 54, 56, 57, 59, 60, 61, 62, 63, 64, 65, 66, 67, 69, 70, 71, 72, 73, 74, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 97, 98, 99, 100, 101, 102, 104, 105, 106, 107, 108, 109, 110, 111, 113, 114, 115, 116, 119, 120, 121, 122, 123, 124, 125, and 127 in Table 1.

In accordance with the criteria set forth in 10 CFR 50.92, the South Texas Project has evaluated these proposed TS changes and determined they involve no significant hazards consideration. The following is provided in support of this conclusion.

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

The proposed changes involve reformatting, renumbering, and rewording of the existing TS. These modifications involve no technical changes to the existing TS. As such, these changes are administrative in nature and do not effect initiators of analyzed events or assumed mitigation of accident or transient events. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed changes involve reformatting, renumbering, and rewording of the existing TS. The changes do not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The changes will not impose any new or different requirements or eliminate any existing requirements. Therefore, the changes do

not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed changes involve reformatting, renumbering, and rewording of the existing TS. The changes are administrative in nature and will not involve any technical changes. The changes will not reduce a margin of safety because they have no impact on any safety analysis assumptions. Also, since these changes are administrative in nature, no question of safety is involved. Therefore, the changes do not involve a significant reduction in a margin of safety.

Based on the above, the South Texas Project has evaluated the proposed changes to the TS and determined they involve no significant hazards consideration.

5.1.2 MORE RESTRICTIVE CHANGES

The proposed changes designated as "More Restrictive" (M) technical changes involve adding more restrictive requirements to the existing TS by either making current requirements more stringent or by adding new requirements that currently do not exist. These changes have been evaluated to not be detrimental to plant safety. These changes are modifications of requirements to provide consistency with the Improved Standard Technical Specifications recommended in NUREG-1431. The proposed changes include Items 39, 51, 129 and 130 in Table 1.

In accordance with the criteria set forth in 10 CFR 50.92, the South Texas Project has evaluated these proposed TS changes and determined they involve no significant hazards consideration. The following is provided in support of this conclusion.

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

The proposed changes provide more stringent requirements for operation of the facility. The more stringent requirements do not result in operation that will increase the probability of initiating an analyzed event and do not alter assumptions relative to mitigation of an accident or transient event. The more stringent requirements continue to ensure process variables, structures, systems, and components are maintained consistent with the safety analyses and licensing basis. Therefore, these changes do not involve a significant increase in the probability or consequences of an accident previously evaluated

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

The proposed changes do not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The changes will not impose any new or different requirements or eliminate any existing requirements. Therefore, the changes do

not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The imposition of more stringent requirements either has no impact on or increases the margin of plant safety. As noted in the discussion of the changes, each change in this category, by definition, provides additional restrictions to enhance plant safety. The changes maintain requirements within the safety analyses and licensing basis. Therefore, these changes do not involve a significant reduction in a margin of safety.

Based on the above, the South Texas Project has evaluated the proposed changes to the TS and determined they involve no significant hazards consideration.

5.1.3 LESS RESTRICTIVE CHANGES

5.1.3.1 LESS RESTRICTIVE CHANGE L.1

Current TS 6.8.3.i, "Diesel Fuel Oil Testing Program," requires properties for ASTM 2D fuel oil to be within limits within 30 days following sampling. The proposed change will increase the time in which compliance must be verified following sampling from 30 days to 31 days. This change is reasonable based on the relatively small increase in time and the probability of a major problem being found that would prevent the diesel generator from starting and operating. The proposed change, Item 70 in Table 1, is consistent with NUREG-1431.

In accordance with the criteria set forth in 10 CFR 50.92, the South Texas Project has evaluated this proposed TS change and determined that it involves no significant hazards consideration. The following is provided in support of this conclusion.

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

The proposed change extends the allowed completion time from 30 days to 31 days to verify that diesel fuel sample properties comply with ASTM 2D. This change does not affect the probability of an accident. Diesel fuel oil is not an initiator of any analyzed event. The consequences of an accident are not increased significantly because of the remote probability of an event occurring during the 24-hour period. Also, the probability of a major problem being found which would prevent the diesel generator from starting and operating is remote. The change will not alter the ability to mitigate an accident or transient event. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The change will not impose any new or different requirements or eliminate any existing requirements. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed change extends the allowed completion time from 30 days to 31 days to verify that diesel fuel sample properties comply with ASTM 2D. The change does not significantly decrease the margin of safety because of the remote probability of an event occurring during the 24-hour period. Also, the probability of a major problem being found which would prevent the diesel generator from starting and operating is remote. The safety analysis assumptions will still be maintained. Therefore, the proposed change does not involve a significant reduction in margin of safety.

Based on the above, the South Texas Project has evaluated the proposed change to the TS and determined that it involves no significant hazards consideration.

5.1.3.2 LESS RESTRICTIVE CHANGE L.2

Current TS 6.9.1.2 and 6.9.1.2.a require annual submittal of an Occupational Radiation Exposure Report by March 1 of the calendar year following the exposures. The submittal date is revised to April 30. This change is consistent with previous comprehensive revisions to 10 CFR Part 20. The report is provided to supplement the information required by 10 CFR 20.22206(b), which is filed on or before April 30 in accordance with 10 CFR 20.22206(c). The proposed change, Item 76 in Table 1, is consistent with NUREG-1431.

In accordance with the criteria set forth in 10 CFR 50.92, the South Texas Project has evaluated this proposed TS change and determined that it involves no significant hazards consideration. The following is provided in support of this conclusion.

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

The proposed change does not result in any changes in hardware or methods of operation. The change in date for submittal of "after the fact" information is not considered in the safety analysis and cannot initiate or affect the mitigation of an accident in any way. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The change will impact only the administrative requirements for submittal of information and does not directly impact the operation of the plant. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed change does not impact the margin of safety since the margin of safety is not dependent on the submittal of information. The safety analysis assumptions will still be maintained. Therefore, the proposed change does not involve a significant reduction in margin of safety.

Based on the above, the South Texas Project has evaluated the proposed change to the TS and determined that it involves no significant hazards consideration.

5.1.3.3 LESS RESTRICTIVE CHANGE L.3

Current TS 6.9.1.3 requires annual submittal of a Radiological Environmental Operating Report by May 1 of each year. The submittal date is revised to May 15. This is an interval increase of 15 days. There is no requirement for the NRC to approve this report and 10 CFR 50 does not specify a specific reporting date. The proposed change, Item 82 in Table 1, is consistent with NUREG-1431.

In accordance with the criteria set forth in 10 CFR 50.92, the South Texas Project has evaluated this proposed TS change and determined that it involves no significant hazards consideration. The following is provided in support of this conclusion.

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

The proposed change does not result in any changes in hardware or methods of operation. The change in date for submittal of "after the fact" information is not considered in the safety analysis and cannot initiate or affect the mitigation of an accident in any way. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing

normal plant operation. The change will impact only the administrative requirements for submittal of information and does not directly impact the operation of the plant. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed change does not impact the margin of safety since the margin of safety is not dependent on the submittal of information. The safety analysis assumptions will still be maintained. Therefore, the proposed change does not involve a significant reduction in margin of safety.

Based on the above, the South Texas Project has evaluated the proposed change to the TS and determined that it involves no significant hazards consideration.

5.1.3.4 LESS RESTRICTIVE CHANGE L.4

Current TS 6.9.1.4 requires annual submittal of a Radioactive Effluent Release Report within 60 days after January 1 of each year. The submittal date is revised to May 1. This is an interval increase of approximately 60 days. The proposed change, Item 85 in Table 1, is consistent with NUREG-1431.

In accordance with the criteria set forth in 10 CFR 50.92, the South Texas Project has evaluated this proposed TS change and determined that it involves no significant hazards consideration. The following is provided in support of this conclusion.

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

The proposed change does not result in any changes in hardware or methods of operation. The change in date for submittal of "after the fact" information is not considered in the safety analysis and cannot initiate or affect the mitigation of an accident in any way. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed change does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The change will impact only the administrative requirements for submittal of information and does not directly impact the operation of the plant. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed change does not impact the margin of safety since the margin of safety is not dependent on the submittal of information. The safety analysis assumptions will still be maintained. Therefore, the proposed change does not involve a significant reduction in margin of safety.

Based on the above, the South Texas Project has evaluated the proposed change to the TS and determined that it involves no significant hazards consideration.

5.1.3.5 LESS RESTRICTIVE CHANGE L.5

The details specifying responsibility for initiating the Radiation Work Permit (RWP) surveillance frequency are being deleted. The requirement of current TS 6.12.1.c pertains to the individual qualified in radiation protection responsible for providing control over the activities in a high radiation area, including the performance of periodic radiation surveillances. The details specifying responsibility for the surveillance frequency in the RWP have no bearing on the requirements for entering a high radiation area. RWP details are controlled by plant procedures. Deleting these details eliminates ambiguity in the TS and the possibility for a misinterpretation of the TS requirements. The proposed change is provided in Table 1 as Item 103.

In accordance with the criteria set forth in 10 CFR 50.92, the South Texas Project has evaluated this proposed TS change and determined that it involves no significant hazards consideration. The following is provided in support of this conclusion.

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

The proposed change eliminates ambiguity in the TS details specifying responsibility for the surveillance frequency in the Radiation Work Permit. The proposed change does not result in any changes in hardware or methods of operation. The details pertaining to the surveillance frequency in the Radiation Work Permit are not considered in the safety analysis and cannot initiate or affect the mitigation of an accident in any way. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The change will not impose any new or different requirements or eliminate any existing requirements. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed change does not impact the margin of safety since the margin of safety is not dependent on who initiates the surveillance frequency of the Radiation Work Permit. The safety analysis assumptions will still be maintained. Therefore, the proposed change does not involve a significant reduction in margin of safety.

Based on the above, the South Texas Project has evaluated the proposed change to the TS and determined that it involves no significant hazards consideration.

5.1.3.6 LESS RESTRICTIVE CHANGE L.6

The details specifying the individuals responsible for performance of the review of the use of overtime are being deleted, and the frequency at which the overtime review is performed is being changed from monthly to periodic. The details specifying responsibility for performance of the overtime review and the frequency of review are controlled by plant procedures. The proposed changes are consistent with the programmatic controls required by NUREG-1431. The proposed changes are provided in Table 1 as Item 30a.

In accordance with the criteria set forth in 10 CFR 50.92, the South Texas Project has evaluated this proposed TS change and determined that it involves no significant hazards consideration. The following is provided in support of this conclusion.

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

The proposed changes delete the details specifying the individuals responsible for performance of the overtime use review, and changes the frequency at which the overtime review is performed from monthly to periodic. The proposed change does not result in any changes in hardware or methods of operation. The details pertaining to the review of overtime are not considered in the safety analysis and cannot initiate or affect the mitigation of an accident in any way. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The change will not impose any new or different requirements or eliminate any existing requirements. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed change does not impact the margin of safety since the margin of safety is not dependent on who performs the overtime review, nor on the frequency at which the review is performed. The safety analysis assumptions will still be maintained. Therefore, the proposed change does not involve a significant reduction in margin of safety.

Based on the above, the South Texas Project has evaluated the proposed change to the TS and determined that it involves no significant hazards consideration.

5.1.3.7 LESS RESTRICTIVE CHANGE L.7

The details specifying the actions to be taken in the event a Safety Limit is violated are deleted from the Specifications. The details regarding notification and reporting to the Commission are unnecessary, since reporting requirements are delineated in 10 CFR 50.72 and 50.73. The details regarding onsite notification requirements and review of the report by PORC and NSRB are unnecessary, since plant policies and procedures already provide guidance on onsite notification and review of reports by these committees. Furthermore, these notification and reporting requirements are beyond the criteria of 10 CFR 50.36(c)(5) for inclusion in the Administrative Controls Section of the TS, and programmatic controls regarding actions to be taken for Safety Limit violations are not included in NUREG-1431. The proposed changes are provided in Table 1 as Item 30a.

In accordance with the criteria set forth in 10 CFR 50.92, the South Texas Project has evaluated this proposed TS change and determined that it involves no significant hazards consideration. The following is provided in support of this conclusion.

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

The proposed changes delete the details regarding actions to be taken in the event of a Safety Limit violation. The proposed change does not result in any changes in hardware or methods of operation. The details pertaining to notification and reporting of Safety Limit violations are not considered in the safety analysis and cannot initiate or affect the mitigation of an accident in any way. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed does not involve a physical alteration of the plant (no new or different type of equipment will be installed) or changes in methods governing normal plant operation. The change will not impose any new or different requirements or eliminate any existing requirements. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed change does not impact the margin of safety since the margin of safety is not dependent on notification and reporting of Safety Limit violations. The safety analysis assumptions will still be maintained. Therefore, the proposed change does not involve a significant reduction in margin of safety.

Based on the above, the South Texas Project has evaluated the proposed change to the TS and determined that it involves no significant hazards consideration.

5.1.4 RELOCATION OF REQUIREMENTS

The proposed changes designated as “Relocated” (R) technical changes involve the relocation of existing TS requirements or details to other licensee-controlled documents such as the UFSAR, TRM, ODCM, or OQAP. Future modification of relocated Administrative Controls requirements is adequately controlled by regulatory requirements such as 10 CFR 50.59 and 10 CFR 50.54. The proposed changes include Items 4, 12, 13, 15, 22, 25, 29, 31, 32, 40, 41, 42, 44, 46, 49, 52, 55, 58, 59, 68, 75, 96, 112, 117, 118, and 126 in Table 1.

In accordance with the criteria set forth in 10CFR50.92, the South Texas Project has evaluated these proposed TS changes and determined they involve no significant hazards consideration. The following is provided in support of this conclusion.

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

The proposed changes relocate certain details from the TS to the UFSAR, TRM, OQAP, or other licensee-controlled documents. These licensee-controlled documents containing the relocated information will be maintained in accordance with 10 CFR 50.59 or 10 CFR 50.54, as appropriate. The UFSAR is subject to the change control provisions of 10 CFR 50.71(e) and the plant procedures and other licensee-controlled documents are subject to controls imposed by plant administrative procedures, which endorse applicable regulations and standards. Since any changes to the UFSAR, TRM, OQAP, or other licensee-controlled documents will be evaluated per 10 CFR 50.59 or 10 CFR 50.54, such changes will not involve a significant increase in the probability or consequences of an accident previously evaluated. Therefore, the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed changes do not involve physical alteration of the plant (no new or different type of equipment will be installed) or change in the methods governing normal plant operation. The proposed changes will not impose or eliminate any

requirements and adequate control of the information will be maintained. Thus, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The proposed changes will not reduce a margin of safety because they have no impact on any safety analysis assumptions. In addition, the details to be relocated from the TS to the UFSAR, TRM, OQAP, or other licensee-controlled documents are the same as in the existing TS. Since any future change to these details in the UFSAR, TRM, OQAP, or other licensee-controlled documents will be evaluated per the requirements of 10 CFR 50.59 or 10 CFR 50.54, as appropriate, such changes would not involve a significant reduction in a margin of safety. Based on 10 CFR 50.92, the existing requirement for NRC review and approval of revisions to these details proposed for relocation does not have a specific margin of safety upon which to evaluate. However, since the proposed changes are consistent with NUREG-1431, which was approved by the NRC Staff, revising the TS to reflect the approved level of detail ensures no significant reduction in the margin of safety.

Based on the above, the South Texas Project has evaluated the proposed changes to the TS and determined they involve no significant hazards consideration.

6.0 ENVIRONMENTAL EVALUATION

The proposed TS changes have been evaluated against the criteria for and identification of licensing and regulatory actions requiring environmental assessment in accordance with 10 CFR 51.21. The proposed changes meet the criteria for categorical exclusion as provided for under 10 CFR 51.22(c)(10) in that they change recordkeeping, reporting, or administrative procedures or requirements. Thus, pursuant to 10 CFR 51.22(b), no environmental assessment or environmental impact statement need be prepared in connection with the issuance of an amendment to the TS incorporating the proposed changes of this request.

ATTACHMENT 2

ANNOTATED

TECHNICAL SPECIFICATION PAGES

AND

ASSOCIATED BASES (INFORMATION ONLY)

PAGE

Note to Reviewers:

Mark-ups in this attachment include references to the list of changes presented in Table 1 of Attachment 1. These references are formatted as such:

<XX>,

where XX is the Change # listed in Table 1.

INDEX

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
6.1 RESPONSIBILITY <u>Responsibility</u>	6-1
6.2 ORGANIZATION <u>Organization</u>	
6.2.1 OFFSITE AND ONSITE ORGANIZATIONS <u>Offsite and Onsite Organizations</u>	6-12
6.2.2 UNIT STAFF <u>Unit Staff</u>	6-12
TABLE 6.2-1 MINIMUM SHIFT CREW COMPOSITION TWO UNITS WITH TWO SEPARATE CONTROL ROOMS (Deleted)	6-4
6.2.3 (Not Used)	
6.2.4 SHIFT TECHNICAL ADVISOR (Not Used)	6-6
6.3 (Not Used) <u>Unit Staff Qualifications</u>	6-4
6.4 TRAINING (Not Used)	6-7
6.5 REVIEW AND AUDIT (Not Used)	6-7
6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)	
Function	6-7
Composition	6-7
Alternates	6-7
Meeting Frequency	6-7
Quorum	6-7
Responsibilities	6-8
Records	6-9

INDEX

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
6.5.2 NUCLEAR SAFETY REVIEW BOARD (NSRB)	6-9
Function.....	6-10
Composition	6-10
Alternates.....	6-10
Consultants.....	6-10
Meeting Frequency.....	6-10
Quorum.....	6-10
Review	6-10
Audits	6-11
Records.....	6-12
6.5.3 TECHNICAL REVIEW AND CONTROL	
Activities.....	6-12
6.6 REPORTABLE EVENT ACTION (Not Used)	6-13
6.7 SAFETY LIMIT VIOLATION (Not Used)	6-13
6.8 PROCEDURES AND PROGRAMS Procedures and Programs	6-146
6.9 REPORTING REQUIREMENTS Reporting Requirements	
6.9.1 ROUTINE REPORTS Routine Reports	6-1812
Startup Report	6-18
Annual Reports	6-1912
Annual Radiological Environmental Operating Report	6-2012
Annual Radioactive Effluent Release Report.....	6-2013
Monthly Operating Reports	6-2113
Core Operating Limits Report	6-2113
6.9.2 SPECIAL REPORTS (Not Used)	6-23
6.10 RECORD RETENTION (Not Used)	6-23

INDEX

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
<u>6.11 RADIATION PROTECTION PROGRAM (Not Used)</u>	<u>6-24</u>
<u>6.12 HIGH RADIATION AREA High Radiation Area</u>	<u>6-2417</u>
<u>6.13 PROCESS CONTROL PROGRAM (PCP) (Not Used)</u>	<u>6-26</u>
<u>6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM) (Not Used)</u>	<u>6-23</u>

ADMINISTRATIVE CONTROLS

Header to include:

6.0 ADMINISTRATIVE CONTROLS

6.1 Responsibility

6.1 RESPONSIBILITY

- 6.1.1 **<4>** The Plant Manager **plant manager** shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

<5, 42> The plant manager or the plant manager's designee shall approve, prior to implementation, each proposed test and experiment that affects nuclear safety and is not described in the UFSAR, and each modification to systems or equipment that affects nuclear safety.

- 6.1.2 **<6, 7>** The Shift Supervisor **manager** (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. **<35>** During any absence of the shift manager from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function for that unit. During any absence of the shift manager from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator (RO) license shall be designated to assume the control room command function for that unit. **<8>** A management directive to this effect, signed by the President and Chief Executive Officer shall be reissued to all station personnel on an annual basis.

From TS 6.5.3.1.b
and 6.5.3.1.c

From Table 6.2-1

Insert a Page Break – Header to include

6.0 ADMINISTRATIVE CONTROLS

6.2 Organization

6.2 ORGANIZATION

OFFSITE AND ONSITE ORGANIZATIONS

6.2.1 <9> Offsite and Onsite Organizations

- 6.2.4 Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. **<10>** Lines of authority, responsibility, and communication shall be **defined and established and defined for the throughout** highest management levels, through intermediate levels, to and including all operating organization positions. **<11>** These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and

relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. **<12>** These requirements, **including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications**, shall be documented in the **UFSAR and/or the Operations Quality Assurance Plan**.

- b. **<13, 14>** ~~The Plant Manager~~ **plant manager** shall be responsible for overall unit safe operation **of the plant** and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. **<15>** ~~The Vice President, Nuclear Generation,~~ **A specified corporate officer** shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. **<16, 17>** The individuals who train the operating staff, ~~and those who carry out health physics~~ **radiation protection functions, and or perform** quality assurance functions may report to the appropriate onsite manager; however, ~~they~~ **these individuals** shall have sufficient organizational freedom to ensure their independence from operating pressures.

UNIT STAFF

6.2.2 **<18>** **Unit Staff** ~~The unit staff shall be as follows:~~

<19> **The unit staff organization shall include the following:**

- a. **<19a>** ~~Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1;~~
- a. **<19b, 32>** **A total of three non-licensed operators for the two units is required in all conditions. At least one of the required non-licensed operators shall be assigned to each unit. When a unit is operating in MODES 1, 2, 3, or 4, two non-licensed operators are required to be assigned to that unit.**

From Table 6.2-1

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

- b. ~~<20>~~ At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in MODE 1, 2, 3, or 4, at least one licensed Senior Operator shall be in the control room;
- b. **<33>** The shift crew composition may be one less than the minimum requirements of 10 CFR 50.54(m)(2)(i) and Specifications 6.2.2.a and 6.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members, provided immediate action is taken to restore the shift crew composition to within the minimum requirements.
- c. ~~<22, 23>~~ A Health Physics Technician* radiation protection technician shall be on site when fuel is in the reactor;. **The position may be vacant for not more than 2 hours in order to accommodate unexpected absence, provided immediate action is taken to fill the required position.**
- d. ~~<24>~~ All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. ~~<25>~~ A site Fire Brigade of at least five members* shall be maintained on site at all times. The Fire Brigade shall not include the Shift Supervisor and the two other members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency; and
- fd. ~~<26, 27>~~ Administrative ~~procedures~~ **controls** shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed Senior Operators **SROs**, licensed Operators **ROs**, health physicists **radiation protection technicians**, auxiliary reactor plant operators, and key maintenance personnel).
- <28a>** The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime. Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40-hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed ~~<28>~~ (except for shift technical advisor personnel):
1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
 2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.

From Table 6.2-1

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~~3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.~~

~~*The Health Physics Technician and Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions. <25>~~

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SOUTH TEXAS - UNITS 1 & 2

6-2

ADMINISTRATIVE CONTROLS

UNIT STAFF (Continued)

4. ~~Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.~~

<29, 30> Any deviation from the above ~~these~~ guidelines shall be authorized in advance by the ~~Plant Manager~~ **plant manager** or his deputy ~~the plant manager's designee~~ or by higher levels of management, in accordance with established ~~approved administrative~~ procedures, and with documentation of the basis for granting the deviation. **<30a> [new paragraph]** Controls shall be included in the procedures **to require that a periodic independent review be conducted to ensure that excessive hours have not been assigned.** ~~such that individual overtime shall be reviewed monthly by the Plant Manager or his designee to assure that excessive hours have not been assigned.~~ Routine deviation from the above **working hour** guidelines is **shall not be** authorized.

- ge. **<31>** **The individual to whom the shift managers directly report shall hold an SRO license.** ~~Senior reactor operator licenses shall be held by:~~

~~Unit Operations Manager
Shift Supervisors
Unit Supervisors~~

~~Reactor operator licenses shall be held by:~~

~~Reactor Operators~~

- f. **<38>** **The Shift Technical Advisor** **<37>** **(STA) shall provide advisory technical support to the shift manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift (Generic Letter 86-04).** **<36>** **This position may also be filled by the shift manager or an individual with an SRO license provided that person meets the qualifications specified by the Commission Policy Statement.**

From TS 6.2.4.1

<32>

TABLE 6.2-1
MINIMUM SHIFT CREW COMPOSITION
TWO UNITS WITH TWO SEPARATE CONTROL ROOMS

WITH THE OPPOSITE UNIT IN MODE 5 OR 6 OR DEFUELED		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	MODE 1, 2, 3, or 4	MODE 5 or 6
SS	1*	1*
SRO	1	None
RO	2	1
RPO	2	2**
STA	1***	None

TS 6.1.2
TS 6.2.2.a

WITH THE OPPOSITE UNIT IN MODE 1, 2, 3, OR 4		
POSITION	NUMBER OF INDIVIDUALS REQUIRED TO FILL POSITION	
	MODE 1, 2, 3, or 4	MODE 5 or 6
SS	1*	1*
SRO	1	None
RO	2	1
RPO	2	1
STA	1* ***	None

TS 6.1.2
To TS 6.2.2.a

SS — Shift Supervisor with a Senior Operator license
SRO — Individual with a Senior Operator license
RO — Individual with an Operator license
RPO — Reactor Plant Operator
STA — Shift Technical Advisor

<33> The shift crew composition may be one less than the minimum requirements of Table 6.2-1 10 CFR 50.54(m)(2)(i) and Specifications 6.2.2.a and 6.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. <34> This provision does not permit any shift crew position to be unmanned upon shift change due to an oncoming shift crewman being late or absent.

To TS 6.2.2.b

<35> During any absence of the Shift Supervisor shift manager from the control room while the unit is in MODE 1, 2, 3, or 4, an individual (other than the Shift Technical Advisor) with an active a valid Senior Reactor Operator (SRO) license shall be designated to assume the control room command function for that unit. During any absence of the Shift Supervisor shift manager from the control room while the unit is in MODE 5 or 6, an individual with an active a valid Senior Operator SRO license or Operator Reactor Operator (RO) license shall be designated to assume the control room command function for that unit.

To TS 6.1.2

TABLE 6.2-1 (Continued)

TABLE NOTATIONS

- ~~* Individual may fill the same position on the opposite Unit. <32>~~
- ~~** One of the two required individuals may fill the same position on the opposite Unit. <32>~~
- ~~*** The STA position shall be manned in MODES 1, 2, 3, and 4 unless the Shift Supervisor or the individual with a Senior Operator license meets the qualifications for the STA as required by the NRC. <36> This position may also be filled by the shift manager or an individual with an SRO license provided that person meets the qualifications specified by the Commission Policy Statement.~~

TS 6.1.2
TS 6.2.2.a
To TS 6.2.2.f

ADMINISTRATIVE CONTROLS

6.2.3 (Not Used)

6.2.3 Not Used

6.2.4 SHIFT TECHNICAL ADVISOR

6.2.4 Not Used

6.2.4.1 **<37>** The Shift Technical Advisor (**STA**) shall provide advisory technical support to the Shift Supervisor **Manager** in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. **<38>** **In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift (Generic Letter 86-04).** The Shift Technical Advisor shall have a bachelor's degree or equivalent in a scientific or engineering discipline and shall have received specific training the response and analysis of the unit for transients and accidents, and in unit design and layout, including the capabilities of instrumentation and controls in the control room.

To TS 6.2.2.f

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6.0 ADMINISTRATIVE CONTROLS

6.3 Unit Staff Qualifications

6.3 (Not Used)

6.3.1 **<39>** Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, as described in the Operations Quality Assurance Plan.

ADMINISTRATIVE CONTROLS

Insert a Page Break – Header to include

6.0 ADMINISTRATIVE CONTROLS

6.4 Through 6.7 Unused Specifications

6.4 <40> TRAINING Not Used

6.4.1 <40> A retraining and replacement training program for the unit staff shall be maintained under the direction of the Training Manager and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and 10 CFR Part 55, and shall include familiarization with relevant industry operational experience.

6.5 REVIEW AND AUDIT Not Used <41>

6.5.1 PLANT OPERATIONS REVIEW COMMITTEE (PORC)

FUNCTION

6.5.1.1 The PORC shall function to advise the Plant Manager on all matters related to nuclear safety.

COMPOSITION

6.5.1.2 The PORC shall be composed of six members, who shall be appointed in writing by the Plant Manager from senior experienced onsite individuals, at the manager level or equivalent, representing each of the following disciplines: engineering, operations, chemistry, health physics, quality assurance/quality control and maintenance. The quality assurance/quality control representatives shall not be appointed as PORC Chairman.

The PORC Chairman shall be appointed in writing from among those members by the Plant Manager. One of the members shall meet the requirements of Regulatory Guide 1.8 (Personnel Selection and Training - Revision 1-R), Radiation Protection Manager.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the Plant Manager to serve on a temporary basis; however, no more than two alternates shall participate as voting members in PORC activities at any one time.

MEETING FREQUENCY

6.5.1.4 The PORC shall meet at least once per calendar month and as convened by the PORC Chairman or his designated alternate.

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<41> QUORUM

6.5.1.5 The quorum of the PORC necessary for the performance of the PORC responsibility and authority provisions of these Technical Specifications shall consist of the Chairman or his designated alternate and three other members including alternates.

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SOUTH TEXAS - UNITS 1 & 2

6-7

Unit 1 - Amendment No. 4, ~~20, 32~~

Unit 2 - Amendment No. ~~10, 23~~

ADMINISTRATIVE CONTROLS

RESPONSIBILITIES <41>

6.5.1.6 The PORC shall be responsible for:

- a. Review of all safety-related station administrative procedures and changes thereto.
- b. Review of safety evaluations for (1) procedures, (2) changes to procedures, structures, components, or systems, and (3) tests or experiments completed under the provision of 10 CFR 50.59 to verify that such actions did not constitute an unreviewed safety question.
- c. Review of proposed (1) procedures, (2) changes to procedures, structures, components, or systems, and (3) tests or experiments which may involve an unreviewed safety question as defined in 10 CFR 50.59.
- d. Review of all programs required by Specification 6.8 and changes thereto.
- e. Review of proposed changes to the Technical Specifications or the Operating License.
- f. Review of all REPORTABLE EVENTS.
- g. Review of reports of significant operating abnormalities or deviations from normal and expected performance of plant equipment or systems that affect nuclear safety.
- h. Review of reports of unanticipated deficiencies in the design or operation of structures, systems, or components that affect nuclear safety.
- i. Review of the Security Plan and implementing procedures and changes thereto.
- j. Review of the Emergency Plan and implementing procedures and changes thereto.
- k. Review of the PROCESS CONTROL PROGRAM and implementing procedures and changes thereto.
- l. Review of the OFFSITE DOSE CALCULATION MANUAL and implementing procedures and changes thereto.
- m. Performance of special reviews, investigations, or analyses and reports thereon as requested by the Plant Manager or the Nuclear Safety Review Board (NSRB).
- n. Review of any accidental, unplanned, or uncontrolled radioactive release including the preparation of reports covering evaluation, recommendations, and disposition of the corrective action to prevent recurrence and the forwarding of these reports to the Plant Manager and to the NSRB.
- o. Reports of violations of codes, regulations, orders, Technical Specifications, or Operating License requirements having nuclear safety significance or reports of abnormal degradation of systems designed to contain radioactive material.
- p. Review of the Fire Protection Program, quality-related implementing procedures and changes thereto.

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ADMINISTRATIVE CONTROLS

RESPONSIBILITIES (Continued) <41>

6.5.1.7 The PORC shall:

- a. Recommend in writing to the Plant Manager approval or disapproval of items considered under Specification 6.5.1.6a. through e. prior to their implementation, and items considered under Specification 6.5.1.6i. through l.
- b. Render determinations in writing with regard to whether or not each item considered under Specification 6.5.1.6a. through e. and o. constitutes an unreviewed safety question; and
- c. Provide written notification within 24 hours to the President and Chief Executive Officer and the Nuclear Safety Review Board of disagreement between the PORC and the Plant Manager; however, the Plant Manager shall have responsibility for resolution of such disagreements pursuant to Specification 6.1.1.

RECORDS

6.5.1.8 The PORC shall maintain written minutes of each PORC meeting that, at a minimum, document the results of all PORC activities performed under the responsibility provisions of these Technical Specifications. Copies shall be provided to the President and Chief Executive Officer and the Nuclear Safety Review Board.

6.5.2 NUCLEAR SAFETY REVIEW BOARD (NSRB)

FUNCTION

6.5.2.1 The NSRB shall function to provide independent review and audit of designated activities in the areas of:

- a. Nuclear power plant operations,
- b. Nuclear engineering,
- c. Chemistry and radiochemistry,
- d. Metallurgy,
- e. Instrumentation and control,
- f. Radiological safety,
- g. Mechanical and electrical engineering,
- h. Civil engineering,
- i. Training,
- j. Nuclear assurance,
- k. Nuclear licensing,
- l. Plant security, and
- m. Environmental impact.

The NSRB shall report to and advise the President and Chief Executive Officer on those areas of responsibility specified in Specifications 6.5.2.7 and 6.5.2.8.

ADMINISTRATIVE CONTROLS

COMPOSITION <41>

6.5.2.2 The NSRB shall be composed of at least five members appointed in writing by the President and Chief Executive Officer selected from senior managers reporting to at least the vice president level in the STPEGS Management Organization. Additional members shall be appointed in writing by the President and Chief Executive Officer so the NSRB collectively has the capability to review technical matters listed in Technical Specification 6.5.2.1. The NSRB Chairman shall be appointed in writing from among these members by the President and Chief Executive Officer.

ALTERNATES

6.5.2.3 All alternate members shall be appointed in writing by the President and Chief Executive Officer to serve on a temporary basis; however, no more than two alternates shall participate as voting members in NSRB activities at any one time.

CONSULTANTS

6.5.2.4 Consultants shall be utilized as determined by the NSRB Chairman to provide expert advice to the NSRB.

MEETING FREQUENCY

6.5.2.5 The NSRB shall meet at least once per calendar quarter during the initial year of unit operation following fuel loading and at least once per 6 months thereafter.

QUORUM

6.5.2.6 The quorum of the NSRB necessary for the performance of the NSRB review and audit functions of these Technical Specifications shall consist of the Chairman or his designated alternate and at least a majority of NSRB members including alternates. No more than a minority of the quorum shall have line responsibility for operation of the unit.

REVIEW

6.5.2.7 The NSRB shall be responsible for the review of:

- a. The safety evaluations for: (1) changes to procedures, equipment, or systems; and (2) tests or experiments completed under the provision of 10 CFR 50.59, to verify that such actions did not constitute an unreviewed safety question;
- b. Proposed changes to procedures, equipment, or systems which involve an unreviewed safety question as defined in 10 CFR 50.59;

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ADMINISTRATIVE CONTROLS

REVIEW (Continued) <41>

- c. Proposed tests or experiments which involve an unreviewed safety question as defined in 10 CFR 50.59;
- d. Proposed changes to Technical Specifications or this Operating License;
- e. Violations of Codes, regulations, orders, Technical Specifications, license requirements, or of internal procedures or instructions having nuclear safety significance;
- f. Significant operating abnormalities or deviations from normal and expected performance of unit equipment that affect nuclear safety;
- g. All REPORTABLE EVENTS;
- h. All recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components that could affect nuclear safety; and
- i. Reports and meeting minutes of the PORC.

AUDITS

6.5.2.8 Audits of unit activities shall be performed under the cognizance of the NSRB. These audits shall encompass:

- a. The conformance of unit operation to provisions contained within the Technical Specifications and applicable license conditions;
- b. The training and qualifications of the unit staff;
- c. Actions taken to correct deficiencies occurring in equipment, structures, systems, components, or method of operation that affect nuclear safety;
- d. The performance of activities required by the Operational Quality Assurance Program to meet the criteria of Appendix B, 10 CFR Part 50;
- e. The fire protection programmatic controls including the implementing procedures;
- f. The fire protection equipment and program implementation utilizing either a qualified offsite licensee fire protection engineer or an outside independent fire protection consultant;
- g. The Radiological Environmental Monitoring Program and the results thereof;

ADMINISTRATIVE CONTROLS

AUDITS (Continued) <41>

- h. The OFFSITE DOSE CALCULATION MANUAL and implementing procedures;
- i. The PROCESS CONTROL PROGRAM and implementing procedures for processing and packaging of radioactive wastes;
- j. The performance of activities required by the Quality Assurance Program for effluent and environmental monitoring; and
- k. Other activities and documents as requested by the NSRB or the President and Chief Executive Officer.

RECORDS

6.5.2.9 Records of NSRB activities shall be prepared, approved, and distributed as indicated below:

- a. Minutes of each NSRB meeting shall be prepared, approved, and forwarded to the President and Chief Executive Officer within 14 days following each meeting;
- b. Reports of reviews encompassed by Specification 6.5.2.7 shall be prepared, approved, and forwarded to the President and Chief Executive Officer within 14 days following completion of the review; and
- c. Audit reports encompassed by Specification 6.5.2.8 shall be forwarded to the President and Chief Executive Officer and to the management positions responsible for the areas audited within 30 days after completion of the audit by the auditing organization.

6.5.3 TECHNICAL REVIEW AND CONTROL

ACTIVITIES

6.5.3.1 Activities that affect nuclear safety shall be conducted as follows:

- a. Procedures required by Specification 6.8, and other procedures that affect nuclear safety, and changes thereto, shall be prepared, reviewed, and approved. Each such procedure, or change thereto, shall be reviewed by an individual/group other than the individual/group who prepared the procedure, or change thereto, but who may be from the same organization as the individual/group who prepared the procedure, or change thereto. Procedures other than station administrative procedures shall be approved by the Plant Manager, Plant Superintendent, or the head of the responsible department prior to implementation. The Plant Manager shall approve station administrative procedures, security plan implementing procedures, and emergency plan implementing procedures. Temporary changes to procedures, which clearly do not change the intent of the approved procedures, shall be approved prior to implementation by two members of the plant staff,

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ADMINISTRATIVE CONTROLS

ACTIVITIES (Continued) <41>

at least one of whom holds a Senior Reactor Operator's License. Changes to procedures that may involve a change to the intent of the original procedure shall be approved by the individual authorized to approve the procedure prior to implementation of the change.

- b. Proposed changes or modifications to safety-related structures, systems, and components shall be reviewed as designated by the Plant Manager. Each such modification shall be reviewed by an individual/group other than the individual/group who designed the modification, but who may be from the same organization as the individual/group who designed the modification. <42> Proposed modifications to safety-related structures, systems, and components shall be approved by the Plant Manager prior to implementation.
- c. <42> Proposed tests and experiments that affect nuclear safety and that are not addressed in the Final Safety Analysis Report shall be prepared, reviewed, and approved prior to implementation. Each such test or experiment shall be reviewed by an individual/group other than the individual/group who prepared the test or experiment but who may be from the same organization as the individual/group who prepared the test or experiment. Proposed tests and experiments shall be approved by the Plant Manager.
- d. Individuals responsible for reviews performed in accordance with Specification 6.5.3.1 (a) through (c) shall be members of the plant management staff previously designated by the Plant Manager. Each review shall include a determination of whether or not additional, cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by qualified personnel of the appropriate discipline.
- e. Each review will include a determination of whether or not an unreviewed safety question is involved. Pursuant to 10 CFR 50.59, NRC approval of items involving an unreviewed safety question will be obtained prior to Plant Manager approval for implementation.

6.5.3.2 Records of the above activities shall be provided to the Plant Manager, PORC, and/or NSRB as necessary for required reviews.

6.6 REPORTABLE EVENT Not Used

6.6.1 ~~The following actions shall be taken for REPORTABLE EVENTS:~~ <43>

a. ~~Not Used.~~

<44>

- b. Each REPORTABLE EVENT shall be reviewed by the PORC, and the results of this review shall be submitted to the NRSB and the President and Chief Executive Officer.

6.7 <45> SAFETY LIMIT VIOLATION Not Used

TS 6.1.1

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TS 6.1.1

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6.7.1 ~~The following actions shall be taken in the event a Safety Limit is violated:~~ <45>

SOUTH TEXAS - UNITS 1 & 2

6-13

Unit 1 - Amendment No. ~~93, 129~~

Unit 2 - Amendment No. ~~80, 118~~

ADMINISTRATIVE CONTROLS

SAFETY LIMIT VIOLATION (Continued)

- a. ~~<46> The NRC Operations Center shall be notified by telephone as soon as possible and in all cases within 1 hour. The President and Chief Executive Officer and the NSRB shall be notified within 24 hours;~~
- b. ~~<46> A Safety Limit Violation Report shall be prepared. The report shall be reviewed by the PORC. This report shall describe: (1) applicable circumstances preceding the violation, (2) effects of the violation upon facility components, systems, or structures, and (3) corrective action taken to prevent recurrence;~~
- c. ~~<46> The Safety Limit Violation Report shall be submitted to the Commission, the NSRB and the President and Chief Executive Officer within 14 days of the violation.; and~~
- d. ~~<46a> Operation of the unit shall not be resumed until authorized by the Commission.~~

Insert a Page Break – Header to include

6.0 ADMINISTRATIVE CONTROLS

6.8 Procedures, Programs, and Manuals <47>

6.8 PROCEDURES AND PROGRAMS <47>

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978;
- b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Generic Letter No. 82-33;
- e. ~~Security Plan implementation; <48>~~
- d. ~~Emergency Plan implementation; <48>~~
- e. ~~<49> PROCESS CONTROL PROGRAM implementation;~~
- f. ~~OFFSITE DOSE CALCULATION MANUAL implementation; <50>~~
- gc. Quality Assurance Program for effluent and environmental monitoring; and
- hd. Fire Protection Program implementation; and

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ie. **<51> Programs and Manuals specified in Specification 6.8.3.**

6.8.2 **<52> Not Used** Each procedure of Specification 6.8.1, and changes thereto, shall be reviewed and approved prior to implementation and reviewed periodically as set forth in Specification 6.5.3 and administrative procedures.

6.8.3 **<53>** The following programs **and manuals** shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

Note to Reviewer - STP has submitted a separate License Amendment Request to remove references to the Post Accident Sampling System from the Technical Specifications, in letter NOC-AE-01000986, dated 8/2/2001.

<54> This A program **provides controls to minimize to reduce** leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to **levels** as low as **practicable. practical levels.** The systems include the containment spray, safety injection, containment hydrogen monitoring, post-accident sampling and primary sampling. The program shall include the following:

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

- 1) Preventive maintenance and periodic visual inspection requirements; and
 - 2) Integrated leak test requirements for each system at refueling cycle intervals or less.
- b. **Not Used** <55>

In-Plant Radiation Monitoring

A program which will ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

- 1) Training of personnel,
- 2) Procedures for monitoring, and
- 3) Provisions for maintenance of sampling and analysis equipment.

- c. Secondary Water Chemistry

<56> This A program **provides controls** for monitoring of secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

- 1) Identification of a sampling schedule for the critical variables and control points for these variables;
- 2) Identification of the procedures used to measure the values of the critical variables;
- 3) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage;
- 4) Procedures for the recording and management of data;
- 5) Procedures defining corrective actions for all off-control point chemistry conditions; and
- 6) A procedure identifying: ~~(a)~~ the authority responsible for the interpretation of the data, and ~~(b)~~ the sequence and timing of administrative events required to initiate corrective action.

Note to Reviewer - STP has submitted a separate License Amendment Request to remove references to the Post Accident Sampling System from the Technical Specifications, in letter NOC-AE-01000986, dated 8/2/2001.

- d. Post-Accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- 1) Training of personnel,

- 2) Procedures for sampling and analysis, and
- 3) Provisions for maintenance of sampling and analysis equipment.

SOUTH TEXAS - UNITS 1 & 2

6-15

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

e. **Not Used** <58>

Accident Monitoring Instrumentation

A program which will ensure the capability to monitor plant variables and systems operating status during and following an accident. This program shall include those instruments provided to indicate system operating status and furnish information regarding the release of radioactive materials (Category 2 and 3 instrumentation as defined in Regulatory Guide 1.97, Revision 2) and provide the following:

- 1) Preventive maintenance and periodic surveillance of instrumentation,
- 2) Pre-planned operating procedures and backup instrumentation to be used if one or more monitoring instruments become inoperable, and
- 3) Administrative procedures for returning inoperable instruments to OPERABLE status as soon as practicable.

f. Component Cyclic or Transient Limit

<59> **This** The Component Cyclic and Transient Limit program provides controls to track the UFSAR Section 3.9.1 cyclic/transient plant conditions to assure that the components are maintained within the design limits. cumulative fatigue usage factor does not exceed 1.0 for those components for which fatigue analysis was performed in accordance with Section III of the American Society of Mechanical Engineers Boiler and Pressure Vessel Code. The cyclic and transient limits used in the design are identified in the Updated Final Safety Analysis Report.

g. Radioactive Effluent Controls Program

<60> **This** A program conforms to shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) <61> Limitations on the functional capability operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;

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ADMINISTRATIVE CONTROLSPROCEDURES AND PROGRAMS (Continued)

- 2) ~~<62>~~ Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to ~~ten 10~~ times the **concentration values in 10 CFR Part 20.1001-20.2401, Appendix B, Table 2, Column 2;**
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- 4) ~~<63>~~ Limitations on the annual and quarterly doses or dose commitment to a **MEMBER OF THE PUBLIC at or beyond the SITE BOUNDARY** from the radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to **10 CFR 50, Appendix I** ~~to 10 CFR Part 50;~~
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;
- 6) ~~<64>~~ Limitations on the **functional capability** ~~operability~~ and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a **period of 31 days** ~~period~~ would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to **10 CFR 50, Appendix I** ~~to 10 CFR Part 50;~~
- 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the following:
 - a. For noble gases: Less than or equal to a dose rate of 500 mrem/yr to the total body and less than or equal to a dose rate of 3000 mrem/yr to the skin, and
 - b. For Iodine-131, for Iodine-133, for tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to a dose rate of 1500 mrem/yr to any organ;
- 8) ~~<65>~~ Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas **at or beyond the SITE BOUNDARY** conforming to **10 CFR 50, Appendix I** ~~to 10 CFR Part 50;~~
- 9) ~~<65>~~ Limitations on the annual and quarterly doses to a **MEMBER OF THE PUBLIC** from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas **at or beyond the SITE BOUNDARY** conforming to **10 CFR 50, Appendix I** ~~to 10 CFR Part 50;~~ and

ADMINISTRATIVE CONTROLS

PROCEDURES AND PROGRAMS (Continued)

- 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to <67> 40 CFR-Part 190.

h. **Not Used** <68>

Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3) Participation in a Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

i. Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all based on applicable ASTM Standards. The purpose of the program is to establish the following:

- a-1) <3, 69> Acceptability of new fuel oil for use prior to addition to **the diesel generator fuel oil storage tanks** by determining that the fuel oil has:

- 1 a. an API gravity or absolute specific gravity within limits,
- 2 b. a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
- 3 c. a clear and bright appearance with proper color;

- b. 2) <3,70> ~~Other properties for ASTM 2D fuel oil are within limits~~ **Within 30 31 days following sampling and addition of new fuel oil to the diesel generator fuel oil storage tanks, verify that the properties of the new fuel oil, other**

ODCM

than those addressed in 6.8.3.i.1 above, are within limits for ASTM 2D fuel oil; and

- e. 3) **<3>** Total particulate concentration of fuel oil is ≤ 10 mg/l when tested every 31 days using a test method based on ASTM D-2276.

<71> The provisions of Surveillance Requirements 4.0.2 and 4.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies.

SOUTH TEXAS - UNITS 1 & 2

6-18

Unit 1 - Amendment No. ~~47, 57, 68~~

Unit 2 - Amendment No. ~~36, 46, 57~~

ADMINISTRATIVE CONTROLSPROCEDURES AND PROGRAMS (Continued)j. Containment Leakage Rate Testing Program

A program shall be established ~~<71a>~~ to implement the leakage rate testing of the ~~<72>~~ primary containment as required by 10 CFR 50.54(o) and ~~<71a>~~ 10 CFR Part 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program", dated September 1995.

~~<72>~~ Peak calculated primary containment internal pressure for the design basis loss of coolant accident (LOCA), P_a is 41.2 psig.

~~<72>~~ The maximum allowable primary containment leakage rate, L_a , is 0.3% percent of primary containment air weight per day.

Leakage rate acceptance criteria are:

a. 1) ~~<3, 72>~~ Primary Containment overall leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit start-up following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_a$ for the combined Type B and Type C tests, and $\leq 0.75 L_a$ as-left and $\leq 1.0 L_a$ as-found for Type A tests.

b. 2) ~~<3>~~ Air lock testing acceptance criteria for the overall air lock leakage rate is $\leq 0.05 L_a$ when tested at $\geq P_a$.

~~<73>~~ The provisions of Surveillance Requirement 4.0.2 do not apply to the test intervals **frequencies** specified in the Containment Leakage Rate Testing Program.

The provisions of Surveillance Requirement 4.0.3 apply to the Containment Leakage Rate Testing Program.

k. Configuration Risk Management Program (CRMP)

A program to assess changes in core damage frequency and cumulative core damage probability resulting from applicable plant configurations. The program should include the following:

- 1) training of personnel;
- 2) procedures for identifying plant configurations, the generation of risk profiles and the evaluation of risk against established thresholds; and
- 3) provisions for evaluating changes in risk resulting from unplanned maintenance activities.

ADMINISTRATIVE CONTROLS

I. Offsite Dose Calculation Manual (ODCM) <3, 122>

- 1) The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and
- 2) The ODCM shall also contain descriptions of the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and the Radiological Effluent Release Report required by Specifications 6.9.1.3 and 6.9.1.4.
- 3) <117> Licensee-initiated changes to the ODCM:
 - a) Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 1. Sufficient information to support the changes together with the appropriate analyses or evaluations justifying the changes and
 2. A determination that the changes maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
 - b) Shall become effective after approval of the plant manager.
 - c) Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (month and year) the change was implemented.

From TS 1.19

From TS 6.14

Insert a Page Break – Heading to include
6.0 ADMINISTRATIVE CONTROLS
6.9 Reporting Requirements

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.9.1 ~~<74>~~ In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the Regional Administrator of the Regional Office of the NRC unless otherwise noted. **The following reports shall be submitted in accordance with 10 CFR 50.4.**

STARTUP REPORT ~~<3>~~

6.9.1.1 **Not Used** ~~<75>~~

Startup Report

A summary report of plant startup and power escalation testing shall be submitted following: (1) receipt of an Operating License, (2) amendment to the license involving a planned increase in power level, (3) installation of fuel that has a different design or has been manufactured by a different fuel supplier, and (4) modifications that may have significantly altered the nuclear, thermal, or hydraulic performance of the unit.

The Startup Report shall address each of the tests identified in the Final Safety Analysis Report and shall include a description of the measured values of the operating conditions or characteristics obtained during the test program and a comparison of these values with design predictions and specifications. Any corrective actions that were required to obtain satisfactory operation shall also be described. Any additional specific details required in license conditions based on other commitments shall be included in this report.

Startup Reports shall be submitted within: (1) 90 days following completion of the Startup Test Program, (2) 90 days following resumption or commencement of commercial power operation, or (3) 9 months following initial criticality, whichever is earliest. If the Startup Report does not cover all three events (i.e., initial criticality, completion of Startup Test Program, and resumption or commencement of commercial operation), supplementary reports shall be submitted at least every 3 months until all three events have been completed.

ANNUAL REPORTS* ~~<3>~~

6.9.1.2 **Occupational Radiation Exposure Report** ~~Annual Reports covering the activities of the unit as described below for the previous calendar year shall be submitted prior to March 1 of each year. ~~<77>~~ The initial report shall be submitted prior to March 1 of the year following initial criticality.~~

~~Reports required on an annual basis shall include:~~

NOTE

~~<78>~~ **A single submittal may be made for the South Texas Project. The submittal should combine sections that are common to both units.**

- a. ~~<79>~~ **This report provides a** A tabulation on an annual basis of the number of station, utility, and other individuals **personnel (including contractors)**, for whom monitoring was required, ~~(including contractors)~~ receiving exposures **an annual deep dose equivalent** greater than 100 mrem ~~in one calendar year~~ and their ~~the~~ associated man-rem exposure **collective deep dose equivalent (reported in**

person-rem) according to work and job functions** **functions** (e.g., reactor operations and surveillance,

~~* A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.~~ <78>

~~**This tabulation supplements the requirements of §20.2206 of 10 CFR Part 20.~~ <79>

SOUTH TEXAS - UNITS 1 & 2

6-19

Unit 1 - Amendment No. 47, 57, 68

Unit 2 - Amendment No. 36, 46, 57

ADMINISTRATIVE CONTROLSANNUAL REPORTS (Continued)

inservice inspection, routine maintenance, special maintenance [describe maintenance], waste processing, and refueling). **The tabulation may include individuals for whom monitoring was provided but not required. This tabulation supplements the requirements of 10 CFR 20.2206.** The dose assignments to various duty functions may be estimated based on pocket ionization chamber dosimeter, thermoluminescent dosimeter (TLD), **electronic dosimeter**, or film badge measurements. Small exposures totaling less than 20% percent of the individual total dose need not be accounted for. In the aggregate, at least 80% percent of the total whole-body dose **deep dose equivalent** received from external sources should be assigned to specific major work functions; and .
~~<76>~~ **The report covering the previous calendar year shall be submitted by April 30 of each year.**

- b. ~~<80>~~ The results of specific activity analyses in which the primary coolant exceeded the limits of Specification 3.4.8. The following information shall be included: (1) Reactor power history starting 48 hours prior to the first sample in which the limit was exceeded (in graphic and tabular format); (2) Results of the last isotopic analysis for radioiodine performed prior to exceeding the limit, results of analysis while limit was exceeded and results of one analysis after the radioiodine activity was reduced to less than limit. Each result should include date and time of sampling and the radioiodine concentrations; (3) Clean-up flow history starting 48 hours prior to the first sample in which the limit was exceeded; (4) Graph of the I-131 concentration ($\mu\text{Ci/gm}$) and one other radioiodine isotope concentration ($\mu\text{Ci/gm}$) as a function of time for the duration of the specific activity above the steady state level; and (5) The time duration when the specific activity of the primary coolant exceeded the radioiodine limit.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT* ~~<3>~~6.9.1.3 Annual Radiological Environmental Operating Report

NOTE

~~<81>~~ A single submittal may be made for the South Texas Project. The submittal should combine sections that are common to both units.

~~<82>~~ The Routine Annual Radiological Environmental Operating Reports covering the operation of the unit during the previous calendar year shall be submitted prior to May 4 15 of each year. ~~<83>~~ The report shall include summaries, interpretations, and analysis of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the **Offsite Dose Calculation Manual (ODCM)** and (2) **10 CFR 50, Appendix I**, Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT** <84>

6.9.1.4 **Radioactive Effluent Release Report**

NOTE

<84> A single submittal may be made for the South Texas Project, which shall specify the releases of radioactive material from each unit.

<85> ~~The Routine Annual Radioactive Effluent Release Reports covering the operation of the unit during the previous 12 months of operation in the previous year shall be submitted within 60 days after January 1 of each year by May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents, and solid waste released from the unit.~~ <86> The material provided shall be (1) consistent with the objectives outlined in the ODCM and **Process Control Program**, and (2) be in conformance with 10 CFR 50.36a and **10 CFR 50, Appendix I**, Section IV.B.1 of Appendix I to 10 CFR Part 50.

* ~~A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.~~ <81>

** ~~A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.~~ <84>

SOUTH TEXAS - UNITS 1 & 2

6-20

Unit 1 - Amendment No. 47, 52, 68
Unit 2 - Amendment No. 36, 41, 57

ADMINISTRATIVE CONTROLS<3> MONTHLY OPERATING REPORTS**6.9.1.5 Monthly Operating Reports**

<87> Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the PORVs **pressurizer power operated relief valves** or **pressurizer** safety valves, shall be submitted on a monthly basis to the Director, Office of Resource Management, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, with a copy to the Regional Administrator of the Regional Office of the NRC, no later than the 15th of each month following the calendar month covered by the report.

<3> CORE OPERATING LIMITS REPORT**6.9.1.6 Core Operating Limits Report (COLR)**

6.9.1.6. a. <88> Core operating limits shall be established **prior to each reload cycle or prior to any remaining portion of a reload cycle. The core operating limits shall be documented in the COLR for the following:** and documented in the ~~CORE OPERATING LIMITS REPORT before each reload cycle, or any part of a reload cycle for the following:~~

1. Safety limits for thermal power, pressurizer pressure, and the highest operating loop coolant temperature (T_{avg}) for Specification 2.1,
2. Limiting Safety System Settings for Reactor Coolant Flow-Low Loop design flow, Overtemperature ΔT , and Overpower ΔT setpoint parameter values for Specification 2.2,
3. Moderator Temperature Coefficient BOL and EOL limits, and 300 ppm surveillance limit for Specification 3/4.1.1.3,
4. Shutdown Bank Insertion Limit for Specification 3/4.1.3.5,
5. Control Bank Insertion Limits for Specification 3/4.1.3.6,
6. Axial Flux Difference limits and target band for Specification 3/4.2.1,
7. Heat Flux Hot Channel Factor, $K(Z)$, Power Factor Multiplier, and (F_{xy}^{RTP}) for Specification 3/4.2.2,
8. Nuclear Enthalpy Rise Hot Channel Factor, and Power Factor Multiplier for Specification 3/4.2.3, and
9. DNB related parameters for Reactor Coolant System T_{avg} , Pressurizer Pressure, and the Minimum Measured Reactor Coolant System Flow for Specification 3/4.2.5.

<88a> The ~~CORE OPERATING LIMITS REPORT~~ **COLR** shall be maintained available in the Control Room.

6.9.1.6. b. **<89, 90>** The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, **specifically those described in the following documents:**

1. WCAP-9272-P-A, "**Westinghouse Reload Safety Evaluation Methodology**," July, 1985 (W Proprietary).

(Methodology for Specification 3.1.1.3 - Moderator Temperature Coefficient, 3.1.3.5 - Shutdown Rod Insertion Limit, 3.1.3.6 - Control Bank Insertion Limits, 3.2.1 - Axial Flux Difference, 3.2.2 - Heat Flux Hot Channel Factor, 3.2.3 - Nuclear Enthalpy Rise Hot Channel Factor, and 3.2.5 - DNB Parameters.)

SOUTH TEXAS - UNITS 1 & 2

6-21

Unit 1 - Amendment No. ~~9, 27, 35, 47, 115~~

Unit 2 - Amendment No. ~~1, 17, 26, 36, 103~~

ADMINISTRATIVE CONTROLSCORE OPERATING LIMITS REPORT (Continued)

2. WCAP-12942-P-A, "**Safety Evaluation Supporting a More Negative EOL Moderator Temperature Coefficient Technical Specification for the South Texas Project Electric Generating Station Units 1 and 2.**"

(Methodology for Specification 3.1.1.3 - Moderator Temperature Coefficient)

3. WCAP-8745-P-A, "Design Bases for the Thermal Overpower ΔT and Thermal Overtemperature ΔT Trip Functions," September 1986 (Westinghouse Proprietary Class 2).

(Methodology for Specification 2.1 - Safety Limits, and 2.2 - Limiting Safety System Settings)

4. WCAP-8385, "**Power Distribution and Load Following Procedures Topical Report,**" September, 1974 (W Proprietary).

(Methodology for Specification 3.2.1 - Axial Flux Difference (Constant Axial Offset Control).)

5. Westinghouse letter NS-TMA-2198, T.M. Anderson (Westinghouse) to K. Kniel (Chief of Core Performance Branch, NRC) January 31, 1980 - Attachment: Operation and Safety Analysis Aspects of an Improved Load Follow Package.

(Methodology for Specification 3.2.1 - Axial Flux Difference (Constant Axial Offset Control). Approved by NRC Supplement No. 4 to NUREG-0422, January, 1981, Docket Nos. 50-369 and 50-370.)

6. NUREG-0800, Standard Review Plan, U. S. Nuclear Regulatory Commission, Section 4.3, Nuclear Design, July, 1981. Branch Technical Position CPB 4.3-1, Westinghouse Constant Axial Offset Control (CAOC), Rev. 2, July 1981.

(Methodology for Specification 3.2.1 - Axial Flux Difference (Constant Axial Offset Control).)

7. WCAP-10266-P-A, Rev. 2, WCAP-11524-NP-A, Rev. 2, "The 1981 Version of the Westinghouse ECCS Evaluation Model Using the BASH Code," Kabadi, J.N., et al., March 1987; including Addendum 1-A, "Power Shape Sensitivity Studies," December 1987 and Addendum 2-A, "BASH Methodology Improvements and Reliability Enhancements," May 1988.

(Methodology for Specification 3.2.2 - Heat Flux Hot Channel Factor.)

8. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Reference Core Report," April, 1995 (W Proprietary) for Loss of Coolant Accident (LOCA) Evaluation models with ZIRLO clad fuel for rod heatup calculation.

(Methodology for Specification 3.2.2 - Heat Flux Hot Channel Factor.)

- 6.9.1.6. c. The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, ~~<91>~~ **Emergency Core Cooling Systems (ECCS)** limits, nuclear limits such as shutdown ~~<92>~~ margin, ~~and~~ transient **analysis limits**, and accident analysis limits) of the safety analysis are met.

SOUTH TEXAS - UNITS 1 & 2

6-22

Unit 1 - Amendment No. ~~27,35,47, 72, 89, 115~~

Unit 2 - Amendment No. ~~17, 26,36, 61, 76, 103~~

ADMINISTRATIVE CONTROLS

CORE OPERATING LIMITS REPORT (Continued) <3>

- 6.9.1.6. d. <93, 94> The ~~CORE OPERATING LIMITS REPORT~~ **COLR**, including any mid-cycle revisions or supplements thereto, shall be provided **to the NRC** upon issuance, for each reload cycle, ~~to the NRC Document Control Desk, with copies to the Regional Administrator and Resident Inspector.~~

SPECIAL REPORTS <3>

- 6.9.2 <95> **Not Used** ~~Special reports shall be submitted to the Regional Administrator of the Regional Office of the NRC within the time period specified for each report.~~

Insert a Page Break – Header to include
6.0 ADMINISTRATIVE CONTROLS
6.10 Through 6.11 Unused Specifications

6.10 <96> RECORD RETENTION **Not Used**

<96>

6.10.1 In addition to the applicable record retention requirements of Title 10, Code of Federal Regulations, the following records shall be retained for at least the minimum period indicated.

6.10.2 The following records shall be retained for at least 5 years:

- a. Records and logs of unit operation covering time interval at each power level;
- b. Records and logs of principal maintenance activities, inspections, repair, and replacement of principal items of equipment related to nuclear safety;
- c. All REPORTABLE EVENTS;
- d. Records of surveillance activities, inspections, and calibrations required by these Technical Specifications;
- e. Records of changes made to the procedures required by Specification 6.8.1;
- f. Records of sealed source and fission detector leak tests and results; and
- g. Records of annual physical inventory of all sealed source material of record.

6.10.3 The following records shall be retained for the duration of the unit Operating License:

- a. Records and drawing changes reflecting unit design modifications made to systems and equipment described in the Final Safety Analysis Report;

- b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories;
- c. Records of doses received by all individuals for whom monitoring was required;
- d. Records of gaseous and liquid radioactive material released to the environs;

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SOUTH TEXAS - UNITS 1 & 2

6-23

Unit 1 - Amendment No. ~~47, 57, 89~~
Unit 2 - Amendment No. ~~36, 46, 76~~

ADMINISTRATIVE CONTROLS

<96>

6.10 RECORD RETENTION (Continued)

- e. Records of transient or operational cycles for those unit components identified in the UFSAR;
- f. Records of reactor tests and experiments;
- g. Records of training and qualification for current members of the unit staff;
- h. Records of inservice inspections performed pursuant to these Technical Specifications;
- i. Records of quality assurance activities required by the Operational Quality Assurance Plan;
- j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59;
- k. Records of meetings of the PORC and the NSRB;
- l. NOT USED
- m. Records of secondary water sampling and water quality;
- n. Records of analyses required by the Radiological Environmental Monitoring Program that would permit evaluation of the accuracy of the analysis at a later date. This should include procedures effective at specified times and QA records showing that these procedures were followed.
- o. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL AND THE PROCESS CONTROL PROGRAM; and
- p. Records of radioactive shipments.

6.11 <97> RADIATION PROTECTION PROGRAM Not Used

~~6.11.1 Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.~~

Insert a Page Break – Header to include
6.0 ADMINISTRATIVE CONTROLS
6.12 High Radiation Area

6.12 HIGH RADIATION AREA <3>

6.12.1 <98> Pursuant to **10 CFR** paragraph 20.1601(c) of ~~10 CFR Part 20~~, in lieu of the "control device" or "alarm signal" required by paragraph **requirements of** 20.1601(a), each high radiation area, as defined in 10 CFR ~~Part 20~~, in which the intensity of

SOUTH TEXAS - UNITS 1 & 2

6-24

Unit 1 - Amendment No. ~~46, 47, 57, 109~~

Unit 2 - Amendment No. ~~35, 36, 46, 96~~

ADMINISTRATIVE CONTROLS**HIGH RADIATION AREA (Continued) <3>**

<99> radiation is **greater than 100 mrem/hr but** equal to or less than 1000 mrem/h at 30 cm (12 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto

<100> shall be controlled by ~~requiring issuance of a~~ Radiation Work Permit (RWP).

Individuals qualified in radiation protection procedures (e.g., ~~Health Physics~~ **radiation protection Technician**) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation <101> areas with **radiation levels** dose rates equal to or less than 1000 mrem/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas. <101a> **[new paragraph]** Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. <102> A radiation monitoring device which continuously indicates the radiation dose rate in the area; ~~or~~
- b. <102> A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and individuals have been made knowledgeable of them; ~~or~~.
- c. <103> An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified by the ~~health physics supervision~~ in the RWP.

6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to individuals with <104> radiation levels greater than 1000 mrem/h at 30 cm (12 in.) but less than 500 Rads in one hour at one meter from the radiation source or from any surface which the radiation penetrates shall be provided with locked **or continuously guarded** doors to prevent ~~unauthorized unintentional entry, and~~ The keys to the doors shall be maintained under the administrative control of the <105> ~~sShift Supervisor~~ **manager** on duty and/or radiation protection supervision. Doors shall remain locked except during periods of access by individuals under an <106> approved RWP. ~~which shall specify~~ **Prior to entry, individuals shall be informed of the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area, or be accompanied by an individual qualified in radiation protection procedures with a radiation dose rate monitoring device.** In lieu of the <107> stay time specification of the RWP, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by individuals qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

<108> For ~~isolated individual~~ high radiation areas with **radiation levels greater than 1000 mrem/h**, accessible to personnel, ~~with radiation levels of greater than 1000 mRem/h at 30 cm (12 in.) but less than 500 Rads in one hour at one meter~~ that are located within large areas, <109> such as **PWR reactor** containment, where no enclosure exists for <110> purposes of locking, **or that cannot be continuously guarded**, and where no enclosure can be reasonably constructed around the <111> ~~isolated individual~~ area, that isolated **individual** area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

SOUTH TEXAS - UNITS 1 & 2

6-25

Unit 1 - Amendment No. 47, 57
Unit 2 - Amendment No. 36, 46

ADMINISTRATIVE CONTROLS

Insert a Page Break – Header to include

6.0 ADMINISTRATIVE CONTROLS

6.13 Through 6.14 Not Used

6.13 <112>PROCESS CONTROL PROGRAM (PCP) Not Used

Process Control Program (PCP) <112>

Changes to the PCP:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3.o. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.
- b. Shall become effective after review and acceptance by the PORC and the approval of the Plant Manager.

6.14 <117>OFFSITE DOSE CALCULATION MANUAL (ODCM) Not Used

Offsite Dose Calculation Manual (ODCM)

<113> Licensee-initiated changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.3.o. This documentation shall contain:
 - 1) Sufficient information to support the <114> changes together with the appropriate analyses or evaluations justifying the changes(s) and
 - 2) A determination that the <115> changes will maintain the levels of radioactive effluent control required by 10CFR 20.1302, <116> 40 CFR Part 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, to 10 CFR Part 50

TRM

To TS 6.8.3.I

and **do** not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

- b. <117> Shall become effective after review and acceptance by the PORC and the approval of the <118> ~~Plant Manager~~ **plant manager**.
- c. Shall be submitted to the <119> **NRC** Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the <120> ~~Annual~~ Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date <121> (e.g., month/ **and** year) the change was implemented.

TO TS 6.8.3.I OQAP

SOUTH TEXAS - UNITS 1 & 2

6-26

Unit 1 -Amendment No. 47, 52, 57
Unit 2 -Amendment No. 36, 41, 46

**THE FOLLOWING PAGES REFLECT CHANGES IN OTHER SECTIONS OF THE
TECHNICAL SPECIFICATIONS CAUSED BY CHANGES TO
TECHNICAL SPECIFICATION 6.0, ADMINISTRATIVE CONTROLS**

DEFINITIONS

MASTER RELAY TEST

1.17 A MASTER RELAY TEST shall be the energization of each master relay and verification of OPERABILITY of each relay. The MASTER RELAY TEST shall include a continuity check of each associated slave relay.

MEMBER(S) OF THE PUBLIC

1.18 MEMBER(S) OF THE PUBLIC means an individual in a controlled area or UNRESTRICTED AREA. However, an individual is not a member of the public during any period in which the individual receives an occupational dose.

1.19 Not Used <122>

OFFSITE DOSE CALCULATION MANUAL

1.19 1) <122> The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring <123> Alarm/Trip Setpoints alarm and trip setpoints, and in the <124> conduct of the Environmental Radiological Monitoring Program. radiological environmental monitoring program; and 2) <125> The ODCM shall also contain (1) descriptions of the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs activities, required by Section 6.8.3 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and Annual Radioactive the Radiological Effluent Release Reports required by Specifications 6.9.1.3 and 6.9.1.4.

OPERABLE - OPERABILITY

1.20 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).

OPERATIONAL MODE - MODE

1.21 An OPERATIONAL MODE (i.e., MODE) shall correspond to any one inclusive combination of core reactivity condition, power level, and average reactor coolant temperature specified in Table 1.2.

PHYSICS TESTS

1.22 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation: (1) described in Chapter 14.0 of the FSAR, (2) authorized under the provisions of 10 CFR 50.59, or (3) otherwise approved by the Commission.

PRESSURE BOUNDARY LEAKAGE

1.23 PRESSURE BOUNDARY LEAKAGE shall be leakage (except steam generator tube leakage) through a nonisolable fault in a Reactor Coolant System component body, pipe wall, or vessel wall.

DEFINITIONS

PROCESS CONTROL PROGRAM <126>

1.24 The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

1.24 Not Used <126>

PURGE - PURGING

1.25 PURGE or PURGING shall be any controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

QUADRANT POWER TILT RATIO

1.26 QUADRANT POWER TILT RATIO shall be the ratio of the maximum upper excore detector calibrated output to the average of the upper excore detector calibrated outputs, or the ratio of the maximum lower excore detector calibrated output to the average of the lower excore detector calibrated outputs, whichever is greater. With one excore detector inoperable, the remaining three detectors shall be used for computing the average.

RATED THERMAL POWER

1.27 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 3800 MWt.

REACTOR TRIP SYSTEM RESPONSE TIME

1.28 The REACTOR TRIP SYSTEM RESPONSE TIME shall be the time interval from when the monitored parameter exceeds its Trip Setpoint at the channel sensor until loss of stationary gripper coil voltage.

REPORTABLE EVENT

1.29 A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 of 10 CFR Part 50.

SHUTDOWN MARGIN

1.30 SHUTDOWN MARGIN shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming all full-length rod cluster assemblies (shutdown and control) are fully inserted except for the single rod cluster assembly of highest reactivity worth which is assumed to be fully withdrawn.

2.0 SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

2.1 SAFETY LIMITS

REACTOR CORE

2.1.1 The combination of THERMAL POWER, pressurizer pressure, and the highest operating loop coolant temperature (T_{avg}) shall not exceed the limits shown in the Core Operating Limits Report.

2.1.1.1 In MODES 1 and 2, the departure from nucleate boiling ratio (DNBR) shall be maintained ≥ 1.17 for the WRB-1 DNB correlation.

2.1.1.2 In MODES 1 and 2, the peak fuel centerline temperature shall be maintained $< 5080^{\circ}\text{F}$, decreasing by 58°F per 10,000 MWD/MTU of burnup.

APPLICABILITY: MODES 1 and 2.

ACTION:

<46a, 127> Whenever the point defined by the combination of the highest operating loop average temperature and THERMAL POWER has exceeded the appropriate pressurizer pressure line, be in HOT STANDBY within 1 hour, and comply with the requirements of ~~Specification 6.7.4~~ **10 CFR 50.36(c)(1)**.

REACTOR COOLANT SYSTEM PRESSURE

2.1.2 The Reactor Coolant System pressure shall not exceed 2735 psig.

APPLICABILITY: MODES 1, 2, 3, 4, AND 5.

ACTION:

MODES 1 and 2:

<46a, 127> Whenever the Reactor Coolant System pressure has exceeded 2735 psig, be in HOT STANDBY with the Reactor Coolant System pressure within its limit within 1 hour, and comply with the requirements of ~~Specification 6.7.4~~ **10 CFR 50.36(c)(1)**.

MODES 3, 4 and 5:

<46a, 127> Whenever the Reactor Coolant System pressure has exceeded 2735 psig, reduce the Reactor Coolant System pressure to within its limit within 5 minutes, and comply with the requirements of ~~Specification 6.7.4~~ **10 CFR 50.36(c)(1)**.

REACTIVITY CONTROL SYSTEMS

MODERATOR TEMPERATURE COEFFICIENT

LIMITING CONDITION FOR OPERATION

3.1.1.3 The moderator temperature coefficient (MTC) shall be within the limits specified in the Core Operating Limits Report (COLR). The maximum upper limit shall be less than or equal to that shown in Figure 3.1-2a.

APPLICABILITY: Beginning of Life (BOL) limit - MODES 1 and 2* only**.
End of Life (EOL) limit - MODES 1, 2, and 3 only**.

ACTION:

- a. With the MTC more positive than the BOL limit specified in the COLR, operation in MODES 1 and 2 may proceed provided:
 1. Control rod withdrawal limits are established and maintained sufficient to restore the MTC to less positive than the BOL limit specified in the COLR within 24 hours or be in HOT STANDBY within the next 6 hours. These withdrawal limits shall be in addition to the insertion limits of Specification 3.1.3.6;
 2. The control rods are maintained within the withdrawal limits established above until a subsequent calculation verifies that the MTC has been restored to within its limit for the all rods withdrawn condition; and
 3. <128> A Special Report is prepared and submitted to the Commission, pursuant to Specification 6.9.2, within 10 days, describing the value of the measured MTC, the interim control rod withdrawal limits, and the predicted average core burnup necessary for restoring the positive MTC to within its limit for the all rods withdrawn condition.
- b. With the MTC more negative than the EOL limit specified in the COLR, be in HOT SHUTDOWN within 12 hours.

*With K_{eff} greater than or equal to 1.

**See Special Test Exceptions Specification 3.10.3.

INSTRUMENTATION

REMOTE SHUTDOWN SYSTEM

LIMITING CONDITION FOR OPERATION

3.3.3.5 This Remote Shutdown System transfer switches, power, controls and monitoring instrumentation channels shown in Table 3.3-9 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. With the number of OPERABLE remote shutdown monitoring channels, transfer switches, power or control circuits less than the Minimum Channels OPERABLE as required by Table 3.3-9, restore the inoperable channel(s) to OPERABLE status within 7 days, or be in HOT SHUTDOWN within the next 12 hours.
- b. With the number of OPERABLE remote shutdown monitoring channels, transfer switches, power or control circuits less than the Total Number of Channels as required by Table 3.3-9, within 60 days restore the inoperable channel(s) to OPERABLE status or, 128 pursuant to Specification 6.9.2, submit a Special Report that defines the corrective action to be taken.
- c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.5.1 Each remote shutdown monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-6.

4.3.3.5.2 Each Remote Shutdown System transfer switch, power and control circuit including the actuated components, shall be demonstrated OPERABLE at least once per 18 months.

TABLE 3.3-10 (Continued)

ACTION STATEMENTS (Continued)

- ACTION 39 - a. With the number of OPERABLE channels one less than the Total Number of Channels requirements, restore one inoperable channel to OPERABLE status within 7 days, or be in at least HOT SHUTDOWN within the next 12 hours.
- b. With the number of OPERABLE channels less than the Minimum Channels Operable requirements, restore at least one inoperable channel to OPERABLE status within 72 hours, or be in at least HOT SHUTDOWN within the next 12 hours.
- ACTION 40 - With the number of OPERABLE channels less than the Minimum Channels Operable requirements, restore at least one inoperable channel to OPERABLE status within 72 hours, or be in at least HOT SHUTDOWN within the next 12 hours.
- ACTION 41 - a. With the number of OPERABLE channels one less than the Required Number of Channels, either restore the system to OPERABLE status within 7 days if repairs are feasible without shutting down or <128> ~~prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2~~ within 30 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- b. With the number of OPERABLE Channels one less than the Minimum Channels OPERABLE in Table 3.3-10, either restore the inoperable channel(s) to OPERABLE status within 48 hours if repairs are feasible without shutting down or:
1. Initiate an alternate method of monitoring the reactor vessel inventory;
 2. <128> ~~Prepare and Submit a Special Report to the Commission pursuant to Specification 6.9.2~~ within 30 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status; and
 3. Restore the system to OPERABLE status at the next scheduled refueling.
- ACTION 42 - a. With one required channel inoperable, restore the required channel to OPERABLE status within 30 days; otherwise, <128> ~~prepared and submitted in accordance with Specification 6.9.2~~ within the next 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels to OPERABLE status.
- b. With two required channels inoperable, restore one required channel to OPERABLE status within 7 days; otherwise, be in HOT STANDBY within 6 hours, and in HOT SHUTDOWN in the next 6 hours.

INSTRUMENTATION

EXPLOSIVE GAS MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.11 The explosive gas monitoring instrumentation channels shown in Table 3.3-13 shall be OPERABLE with their Alarm/Trip Setpoints set to ensure that the limits of Specification 3.11.2.5 are not exceeded.

APPLICABILITY: As shown in Table 3.3-13

ACTION:

- a. With an explosive gas monitoring instrumentation channel Alarm/Trip Setpoint less conservative than required by the above specification, declare the channel inoperable and take the ACTION shown in Table 3.3-13.
- b. With less than the minimum number of explosive gas monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-13. Restore the inoperable instrumentation to OPERABLE status within 30 days and, if unsuccessful ~~[<128> prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 to explain why this inoperability was not corrected in a timely manner.~~
- c. The provisions of Specification 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.11 Each explosive gas monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, CHANNEL CALIBRATION and ANALOG CHANNEL OPERATIONAL TEST or DIGITAL CHANNEL OPERATIONAL TEST, as applicable, at the frequencies shown in Table 4.3-9.

REACTOR COOLANT SYSTEM

STEAM GENERATORS

SURVEILLANCE REQUIREMENTS (Continued)

- b. The steam generator shall be determined OPERABLE after completing the corresponding actions [plug or (for Model E steam generators only) repair all tubes exceeding the plugging or repair limit and all tubes containing through-wall cracks] required by Table 4.4-2 and Table 4.4-3.

4.4.5.5 Reports

- a. Within 15 days following the completion of each inservice inspection of steam generator tubes, the number of tubes plugged or repaired in each steam generator shall be reported <128> to the Commission in a Special Report pursuant to Specification 6.9.2;
- b. The complete results of the steam generator tube inservice inspection shall be submitted <128> to the Commission in a Special Report pursuant to Specification 6.9.2 within 12 months following the completion of the inspection. This Special Report shall include:
 - 1) Number and extent of tubes inspected,
 - 2) Location and percent of wall-thickness penetration for each indication of an imperfection, and
 - 3) Identification of tubes plugged or repaired.
- c. Results of steam generator tube inspections which fall into Category C-3 shall be reported in a Special Report <128> to the Commission pursuant to Specification 6.9.2 within 30 days and prior to resumption of plant operation. This report shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence.
- d. For Model E steam generators, implementation of the voltage-based repair criteria to tube support plate intersections, notify the Staff prior to returning the steam generators to service should any of the following conditions arise:
 - 1) If estimated leakage based on the projected end-of-cycle (or if not practical, using the actual measured end-of-cycle) voltage distribution exceeds the leak limit (determined from the licensing basis dose calculation for the postulated main steam line break) for the next operating cycle. The calculation(s) shall be done using:
 - a) The methodology of Generic Letter 95-05 for intersections at the flow distribution baffles, at the applicable cold leg support plates, and at the hot leg support plates L through R; and

REACTOR COOLANT SYSTEM

OVERPRESSURE PROTECTION SYSTEMS

LIMITING CONDITION FOR OPERATION

-
- 3.4.9.3 An Overpressure Protection System shall be OPERABLE with a maximum of one centrifugal charging pump capable of injecting into the RCS and the emergency core cooling system (ECCS) accumulators isolated and either a. or b. below:
- Two power-operated relief valves (PORVs) with lift settings which do not exceed the limit established in Figure 3.4-4, or
 - The Reactor Coolant System (RCS) depressurized with an RCS vent of greater than or equal to 2.0 square inches.

APPLICABILITY: MODES 4 and 5, and MODE 6 when the head is on the reactor vessel¹.

ACTION:

- With one or more ECCS accumulators not isolated, isolate the ECCS accumulator(s) within 1 hour.
- With more than one centrifugal charging pump capable of injecting into the RCS, immediately initiate action to render all but one centrifugal charging pump incapable of injecting into the RCS².
- With one PORV inoperable in MODE 4, restore the inoperable PORV to OPERABLE status within 7 days or depressurize and vent the RCS through at least a 2.0 square inch vent within the next 8 hours.
- With one PORV inoperable in MODES 5 or 6 with the head on the reactor vessel, restore the inoperable PORV to OPERABLE status within 24 hours, or complete depressurization and venting of the RCS through at least a 2.0 square inch vent within the next 8 hours³.
- With both PORVs inoperable, depressurize and vent the RCS through at least a 2.0 square inch vent within 8 hours³.
- In the event either the PORVs or the RCS vent(s) are used to mitigate an RCS pressure transient, a Special Report shall be ~~<128> prepared and submitted to the Commission pursuant to Specification 6.9.2~~ within 30 days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or RCS vent(s) on the transient, and any corrective action necessary to prevent recurrence.
- The provisions of Specification 3.0.4 are not applicable.

EMERGENCY CORE COOLING SYSTEMS

3/4.5.2 ECCS SUBSYSTEMS - T_{AVG} GREATER THAN OR EQUAL TO 350°F

LIMITING CONDITION FOR OPERATION

3.5.2 Three independent Emergency Core Cooling System (ECCS) subsystems shall be OPERABLE with each subsystem comprised of:

- a. One OPERABLE High Head Safety Injection pump,
- b. One OPERABLE Low Head Safety Injection pump,
- c. One OPERABLE RHR heat exchanger, and
- d. An OPERABLE flow path capable of taking suction from the refueling water storage tank on a Safety Injection signal and automatically transferring suction to the containment sump during the recirculation phase of operation through a High Head Safety Injection pump and into the Reactor Coolant System and through a Low Head Safety Injection pump and its respective RHR heat exchanger into the Reactor Coolant System.

APPLICABILITY: MODES 1, 2, and 3.*

ACTION:

- a. With less than the above subsystems OPERABLE, but with at least two High Head Safety Injection pumps in an OPERABLE status, two Low Head Safety Injection pumps and associated RHR heat exchangers in an OPERABLE status, and sufficient flow paths to accommodate these OPERABLE Safety Injection pumps and RHR heat exchangers, ** restore the inoperable subsystem(s) to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be <128> prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date. The current value of the usage factor for each affected Safety Injection nozzle shall be provided in this Special Report whenever its value exceeds 0.70.

*The provisions of Specifications 3.0.4 and 4.0.4 are not applicable for entry into MODE 3 for the Safety Injection pumps declared inoperable pursuant to Specification 4.5.3.1.2 provided that the Safety Injection pumps are restored to OPERABLE status within 4 hours or prior to the temperature of one or more of the RCS cold legs exceeding 375°F, whichever comes first.

**Verify required pumps, heat exchangers and flow paths OPERABLE every 48 hours.

EMERGENCY CORE COOLING SYSTEMS

3/4.5.3 ECCS SUBSYSTEMS - T_{avg} LESS THAN 350°F

LIMITING CONDITION FOR OPERATION

3.5.3.1 As a minimum, the following ECCS components shall be OPERABLE:

- a. Two OPERABLE High Head Safety Injection pumps,*
- b. Two OPERABLE Low Head Safety Injection pumps and their associated RHR heat exchangers, and
- c. Two OPERABLE flow paths capable of taking suction from the refueling water storage tank upon being manually realigned and transferring suction to the containment sump during the recirculation phase of operation through a High Head Safety Injection pump and into the Reactor Coolant System and through a Low Head Safety Injection pump and its respective RHR heat exchanger into the Reactor Coolant System.

APPLICABILITY: MODE 4.

ACTION:

- a. With less than the above-required ECCS components OPERABLE because of the inoperability of either the High Head Safety Injection pumps or the flow paths from the refueling water storage tank, restore at least the required ECCS components to OPERABLE status within 1 hour or be in COLD SHUTDOWN within the next 20 hours.
- b. With less than the above-required ECCS components OPERABLE because of the inoperability of either the residual heat removal heat exchangers or the Low Head Safety Injection pumps, restore at least the required ECCS components to OPERABLE status or maintain the Reactor Coolant System T_{avg} less than 350°F by use of alternate heat removal methods.
- c. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be 128 prepared and submitted to the Commission pursuant to Specification 6.9.2 within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date. The current value of the usage factor for each affected Safety Injection nozzle shall be provided in this Special Report whenever its value exceeds 0.70.

*A maximum of one High Head Safety Injection pump shall be OPERABLE and a second High Head Safety Injection pump shall be OPERABLE except that its breaker shall be racked out (the third HHSI pump shall have its breaker racked out) within: (1) 4 hours after entering MODE 4 from MODE 3 or prior to the temperature of one or more of the RCS cold legs decreasing below 325°F, whichever comes first; or (2) 4 hours after entering MODE 4 from MODE 5 or prior to the temperature of one or more of the RCS cold legs exceeding 225°F, whichever comes first.

CONTAINMENT SYSTEMS

CONTAINMENT STRUCTURAL INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.6 The structural integrity of the containment(s) shall be maintained at a level consistent with the acceptance in Specification 4.6.1.6.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With the abnormal degradation indicated by the conditions in Specification 4.6.1.6.1a.4, restore the containment(s) to the required level of integrity or verify that containment integrity is maintained within 72 hours and perform an engineering evaluation of the containment(s) and provide a Special Report <128> to the Commission within 15 days in accordance with Specification 6.9.2 or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the indicated abnormal degradation of the structural integrity other than ACTION a. at a level below the acceptance criteria of Specification 4.6.1.6, restore the containment(s) to the required level of integrity or verify that containment integrity is maintained within 15 days, perform an engineering evaluation of the containment(s) and provide a Special Report <128> to the Commission within 30 days in accordance with Specification 6.9.2 or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.6.1.6 CONTAINMENT PRESTRESSING SYSTEM

The structural integrity of the prestressing tendons of the containment shall be demonstrated at the end of 1, 3, and 5 years following the initial containment structural integrity test and at 5-year intervals thereafter. The inspection schedule for lift-off testing shall be as shown in Figure 4.6-1.

4.6.1.6.1 The adequacy of prestressing forces in tendons shall be demonstrated by:

- a. Determining that a random but representative sample of at least 10 tendons (6 hoop, 4 interverted U) each have an observed lift-off force within predicted limits established for each tendon. For each subsequent inspection, one tendon from each group shall be kept unchanged to develop a history and to correlate the observed data. The procedure of inspection and the tendon acceptance criteria shall be as follows:

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION

ACTION (Continued)

maintenance or testing, demonstrate the OPERABILITY of the remaining OPERABLE standby diesel generator(s) by performing Surveillance Requirement 4.8.1.1.2a.2) within 8 hours, unless it can be demonstrated there is no common mode failure for the remaining diesel generators; restore at least one of the inoperable sources to OPERABLE status within 12 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore at least two offsite circuits to OPERABLE status within 72 hours and three standby diesel generators to OPERABLE status within 14 days from the time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- d. With one standby diesel generator inoperable in addition to ACTION b. or c. above, verify that:
1. All required systems, subsystems, trains, components, and devices that depend on the remaining OPERABLE diesel generator as a source of emergency power are also OPERABLE, and
 2. When in MODE 1, 2, or 3, the steam-driven auxiliary feedwater pump is OPERABLE.

If these conditions are not satisfied within 24 hours be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.

- e. With two of the above required offsite A.C. circuits inoperable, restore at least one of the inoperable offsite sources to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours. With only one offsite source restored, restore at least two offsite circuits to OPERABLE status within 72 hours from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- f. With two or three of the above required standby diesel generators inoperable, demonstrate the OPERABILITY of two offsite A.C. circuits by performing the requirements of Specification 4.8.1.1.1a. within 1 hour and at least once per 8 hours thereafter; restore at least one standby diesel generator to OPERABLE status within 2 hours and at least two standby diesel generators to OPERABLE status within 24 hours or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. Restore at least three standby diesel generators to OPERABLE status within 14 days from time of initial loss or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- g. **<129> With one or more diesel generator fuel oil storage tanks with stored fuel oil total particulates not within the Diesel Fuel Oil Testing Program limits, within 7 days restore the fuel oil total particulates within limits, or declare the associated standby diesel generator(s) inoperable.**

- h. **<130> With one or more diesel generator fuel oil storage tanks with new fuel oil properties not within the Diesel Fuel Oil Testing Program limits, within 30 days restore the fuel oil properties within limits, or declare the associated standby diesel generator(s) inoperable.**

SOUTH TEXAS – UNITS 1 & 2

3/4 8-2

Unit 1 – Amendment No. ~~68~~, ~~85~~

Unit 2 – Amendment No. ~~57~~, ~~72~~

FOR INFORMATION ONLY

Excerpt from Bases for 3/4.4.5 STEAM GENERATORS

SR 4.4.5.5 implements several reporting requirements for Model E steam generators recommended by GL 95-05 for situations which the NRC wants to be notified prior to returning the SGs to service. For the purpose of this reporting requirement, leakage and conditional burst probability can be calculated based on the as-found voltage distribution rather than the projected end-of-cycle voltage distribution (refer to GL 95-05 for more information) when it is not practical to complete these calculations using the projected EOC voltage distributions prior to returning the SGs to service. Note that if leakage and conditional burst probability were calculated using the EOC voltage distribution for the purposes of addressing the GL section 6.a.1 and 6.a.3 reporting criteria, then the results of the projected EOC voltage distribution should be provided per the GL section 6.b.(c) criteria.

Whenever the results of any steam generator tubing inservice inspection fall into Category C-3, these results will be promptly reported ~~<128>~~ to the Commission in a Special Report pursuant to ~~Specification 6.9.2~~ within 30 days and prior to resumption of plant operation. Such cases will be considered by the Commission on a case-by-case basis and may result in a requirement for analysis, laboratory examinations, tests, additional eddy-current inspection, and revision of the Technical Specifications, if necessary.

ATTACHMENT 3

TECHNICAL SPECIFICATION PAGES WITH PROPOSED CHANGES INCORPORATED

INDEX

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
<u>6.1 Responsibility</u>	6-1
<u>6.2 Organization</u>	
6.2.1 Offsite and Onsite Organizations	6-2
6.2.2 Unit Staff	6-2
TABLE 6.2-1 (Deleted)	
6.2.3 (Not Used)	
6.2.4 (Not Used)	
<u>6.3 Unit Staff Qualifications</u>	6-4
<u>6.4 (Not Used)</u>	
<u>6.5 (Not Used)</u>	
<u>6.6 (Not Used)</u>	
<u>6.7 (Not Used)</u>	
<u>6.8 Procedures, Programs, and Manuals</u>	6-6
<u>6.9 Reporting Requirements</u>	
6.9.1 Occupational Radiation Exposure Report	6-12
Annual Radiological Environmental Operating Report.	6-12
Radioactive Effluent Release Report	6-13
Monthly Operating Reports	6-13
Core Operating Limits Report	6-13
6.9.2 (Not Used)	
<u>6.10 (Not Used)</u>	

INDEX

ADMINISTRATIVE CONTROLS

<u>SECTION</u>	<u>PAGE</u>
<u>6.11 (Not Used)</u>	
<u>6.12 High Radiation Area</u>	6-17
<u>6.13 (Not Used)</u>	
<u>6.14 (Not Used)</u>	

6.0 ADMINISTRATIVE CONTROLS

6.1 Responsibility

- 6.1.1 The plant manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

The plant manager or the plant manager's designee shall approve, prior to implementation, each proposed test and experiment that affects nuclear safety and is not described in the UFSAR, and each modification to systems or equipment that affects nuclear safety.

- 6.1.2 The shift manager shall be responsible for the control room command function. During any absence of the shift manager from the control room while the unit is in MODE 1, 2, 3, or 4, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function for that unit. During any absence of the shift manager from the control room while the unit is in MODE 5 or 6, an individual with an active SRO license or Reactor Operator (RO) license shall be designated to assume the control room command function for that unit.
-

6.0 ADMINISTRATIVE CONTROLS

6.2 Organization

6.2.1 Offsite and Onsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including the plant-specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the UFSAR and/or the Operations Quality Assurance Plan.
- b. The plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. A specified corporate officer shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff, carry out radiation protection functions, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

6.2.2 Unit Staff

The unit staff organization shall include the following:

- a. A total of three non-licensed operators for the two units is required in all conditions. At least one of the required non-licensed operators shall be assigned to each unit. When a unit is operating in MODES 1, 2, 3, or 4, two non-licensed operators are required to be assigned to that unit.
- b. The shift crew composition may be one less than the minimum requirements of 10 CFR 50.54(m)(2)(i) and Specifications 6.2.2.a and 6.2.2.g for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members, provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

(continued)

6.0 ADMINISTRATIVE CONTROLS

6.2 Organization

6.2.2 Unit Staff (continued)

- c. A radiation protection technician shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours in order to accommodate unexpected absence, provided immediate action is taken to fill the required position.
- d. Administrative controls shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions (e.g., licensed SROs, licensed ROs, radiation protection technicians, reactor plant operators, and key maintenance personnel).

The controls shall include guidelines on working hours that ensure adequate shift coverage shall be maintained without routine heavy use of overtime.

Any deviation from these guidelines shall be authorized in advance by the plant manager or the plant manager's designee, in accordance with approved administrative procedures, with documentation of the basis for granting the deviation.

Controls shall be included in the procedures to require a periodic independent review be conducted to ensure that excessive hours have not been assigned. Routine deviation from the working hour guidelines shall not be authorized.

- e. The individual to whom the shift managers directly report shall hold an SRO license.
- f. The Shift Technical Advisor (STA) shall provide advisory technical support to the shift manager in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift (Generic Letter 86-04). This position may also be filled by the shift manager or an individual with an SRO license provided that person meets the qualifications specified by the Commission Policy Statement.

6.2.3 Not Used

6.2.4 Not Used

6.0 ADMINISTRATIVE CONTROLS

6.3 Unit Staff Qualifications

- 6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971, as described in the Operations Quality Assurance Plan.
-

6.0 ADMINISTRATIVE CONTROLS
6.4 Through 6.7 Unused Specifications

6.4 Not Used

6.5 Not Used

6.6 Not Used

6.7 Not Used

6.0 ADMINISTRATIVE CONTROLS
6.8 Procedures, Programs, and Manuals

6.8.1 Written procedures shall be established, implemented, and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978;
- b. The emergency operating procedures required to implement the requirements of NUREG-0737 and Supplement 1 to NUREG-0737 as stated in Generic Letter No. 82-33;
- c. Quality Assurance Program for effluent and environmental monitoring;
- d. Fire Protection Program implementation; and
- e. Programs and Manuals specified in Specification 6.8.3.

6.8.2 Not Used

6.8.3 The following programs and manuals shall be established, implemented, and maintained:

a. Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include containment spray, safety injection, containment hydrogen monitoring, post-accident sampling and primary sampling. The program shall include the following:

- 1) Preventive maintenance and periodic visual inspection requirements; and
- 2) Integrated leak test requirements for each system at refueling cycle intervals or less.

b. Not Used

c. Secondary Water Chemistry

This program provides controls for monitoring secondary water chemistry to inhibit steam generator tube degradation. This program shall include:

- 1) Identification of a sampling schedule for the critical variables and control points for these variables;
- 2) Identification of the procedures used to measure the values of the critical variables;

(continued)

6.8.3.c (continued)

- 3) Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in-leakage;
- 4) Procedures for the recording and management of data;
- 5) Procedures defining corrective actions for all off-control point chemistry conditions; and
- 6) A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events required to initiate corrective action.

d. Post-Accident Sampling

A program which will ensure the capability to obtain and analyze reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere samples under accident conditions. The program shall include the following:

- 1) Training of personnel,
- 2) Procedures for sampling and analysis, and
- 3) Provisions for maintenance of sampling and analysis equipment.

e. Not Used

f. Component Cyclic or Transient Limit

This program provides controls to track the UFSAR Section 3.9.1 cyclic/transient plant conditions to assure that the components are maintained within the design limits.

g. Radioactive Effluent Controls Program

This program conforms to 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program shall be contained in the ODCM, shall be implemented by procedures, and shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the functional capability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM;

(continued)

6.8.3.g (continued)

- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to ten times the concentration values in 10 CFR 20, Appendix B, Table 2, Column 2;
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.1302 and with the methodology and parameters in the ODCM;
- 4) Limitations on the annual and quarterly doses and dose commitment to a MEMBER OF THE PUBLIC at or beyond the SITE BOUNDARY from the radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to 10 CFR 50, Appendix I;
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days;
- 6) Limitations on the functional capability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in period of 31 days would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to 10 CFR 50, Appendix I;
- 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas at or beyond the SITE BOUNDARY conforming to the following:
 - a) For noble gases: Less than or equal to a dose rate of 500 mrem/yr to the total body and less than or equal to a dose rate of 3000 mrem/yr to the skin, and
 - b) For Iodine-131, for Iodine-133, for tritium, and for all radionuclides in particulate form with half-lives greater than 8 days: Less than or equal to a dose rate of 1500 mrem/yr to any organ;
- 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas at or beyond the SITE BOUNDARY conforming to 10 CFR 50, Appendix I;
- 9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from Iodine-131, Iodine-133, tritium, and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas at or beyond the SITE BOUNDARY conforming to 10 CFR 50, Appendix I; and

(continued)

6.8.3.g (continued)

- 10) Limitations on the annual dose or dose commitment to any MEMBER OF THE PUBLIC due to releases of radioactivity and to radiation from uranium fuel cycle sources conforming to 40 CFR 190.

h. Not Used

i. Diesel Fuel Oil Testing Program

A diesel fuel oil testing program to implement required testing of both new fuel oil and stored fuel oil shall be established. The program shall include sampling and testing requirements, and acceptance criteria, all based on applicable ASTM Standards. The purpose of the program is to establish the following:

- 1) Acceptability of new fuel oil prior to addition to the diesel generator fuel oil storage tanks by determining that the fuel oil has:
 - a) an API gravity or absolute specific gravity within limits,
 - b) a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and
 - c) a clear and bright appearance with proper color;
- 2) Within 31 days following addition of new fuel to the diesel generator fuel oil storage tanks, verify that the properties of the new fuel oil, other than those addressed in 6.8.3.i.1 above, are within limits for ASTM 2D fuel oil; and
- 3) Total particulate concentration of fuel oil is ≤ 10 mg/l when tested every 31 days using a test method based on ASTM D-2276.

The provisions of Surveillance Requirements 4.0.2 and 4.0.3 are applicable to the Diesel Fuel Oil Testing Program test frequencies.

j. Containment Leakage Rate Testing Program

A program shall be established to implement leakage rate testing of the containment as required by 10 CFR 50.54(o) and 10 CFR 50, Appendix J, Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines contained in Regulatory Guide 1.163, "Performance-Based Containment Leak-Testing Program", dated September 1995.

Peak calculated containment internal pressure for the design basis loss of coolant accident (LOCA), P_a is 41.2 psig.

(continued)

6.8.3.j (continued)

The maximum allowable containment leakage rate, L_a , is 0.3 percent of containment air weight per day.

Leakage rate acceptance criteria are:

- 1) Containment overall leakage rate acceptance criterion is $\leq 1.0 L_a$. During the first unit start-up following testing in accordance with this program, the leakage rate acceptance criteria are $\leq 0.60 L_a$ for the combined Type B and Type C tests, and $\leq 0.75 L_a$ as-left and $\leq 1.0 L_a$ as-found for Type A tests.
- 2) Air lock testing acceptance criteria for the overall air lock leakage rate is $\leq 0.05 L_a$ when tested at $\geq P_a$.

The provisions of Surveillance Requirement 4.0.2 do not apply to the test frequencies specified in the Containment Leakage Rate Testing Program.

The provisions of Surveillance Requirement 4.0.3 apply to the Containment Leakage Rate Testing Program.

k. Configuration Risk Management Program (CRMP)

A program to assess changes in core damage frequency and cumulative core damage probability resulting from applicable plant configurations. The program should include the following:

- 1) training of personnel;
- 2) procedures for identifying plant configurations, the generation of risk profiles and the evaluation of risk against established thresholds; and
- 3) provisions for evaluating changes in risk resulting from unplanned maintenance activities.

l. Offsite Dose Calculation Manual (ODCM)

- 1) The ODCM shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm and trip setpoints, and in the conduct of the radiological environmental monitoring program; and

(continued)

6.8.3.I (continued)

- 2) The ODCM shall also contain descriptions of the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and the Radiological Effluent Release Report required by Specifications 6.9.1.3 and 6.9.1.4.
 - 3) Licensee-initiated changes to the ODCM:
 - a) Shall be documented and records of reviews performed shall be retained. This documentation shall contain:
 1. Sufficient information to support the changes together with the appropriate analyses or evaluations justifying the changes and
 2. A determination that the changes maintain the levels of radioactive effluent control required by 10 CFR 20.1302, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and do not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
 - b) Shall become effective after approval of the plant manager.
 - c) Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (month and year) the change was implemented.
-

6.0 ADMINISTRATIVE CONTROLS

6.9 Reporting Requirements

6.9.1 The following reports shall be submitted in accordance with 10 CFR 50.4.

6.9.1.1 Not Used

6.9.1.2 Occupational Radiation Exposure Report

NOTE

A single submittal may be made for the South Texas Project. The submittal should combine sections that are common to both units.

This report provides a tabulation on an annual basis of the number of station, utility, and other personnel (including contractors), for whom monitoring was required, receiving an annual deep dose equivalent greater than 100 mrem and the associated collective deep dose equivalent (reported in person-rem) according to work and job functions (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance, waste processing, and refueling). The tabulation may include individuals for whom monitoring was provided but not required. This tabulation supplements the requirements of 10 CFR 20.2206. The dose assignments to various duty functions may be estimated based on pocket ionization chamber, thermoluminescent dosimeter (TLD), electronic dosimeter, or film badge measurements. Small exposures totaling less than 20 percent of the individual total dose need not be accounted for. In the aggregate, at least 80 percent of the total deep dose equivalent received from external sources should be assigned to specific major work functions. The report covering the previous calendar year shall be submitted by April 30 of each year.

6.9.1.3 Annual Radiological Environmental Operating Report

NOTE

A single submittal may be made for the South Texas Project. The submittal should combine sections that are common to both units.

The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted prior to May 15 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the radiological environmental monitoring program for the reporting period. The material provided shall be consistent with the objectives outlined in the Offsite Dose Calculation Manual (ODCM) and 10 CFR 50, Appendix I, Sections IV.B.2, IV.B.3, and IV.C.

(continued)

6.0 ADMINISTRATIVE CONTROLS
6.9 Reporting Requirements

6.9.1.4 Radioactive Effluent Release Report

NOTE

A single submittal may be made for the South Texas Project, which shall specify the releases of radioactive material from each unit.

The Radioactive Effluent Release Report covering the operation of the unit in the previous year shall be submitted by May 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents, and solid waste released from the unit. The material provided shall be consistent with the objectives outlined in the ODCM and Process Control Program, and be in conformance with 10 CFR 50.36a and 10 CFR 50, Appendix I, Section IV.B.1.

6.9.1.5 Monthly Operating Reports

Routine reports of operating statistics and shutdown experience, including documentation of all challenges to the pressurizer power operated relief valves or pressurizer safety valves, shall be submitted on a monthly basis no later than the 15th of each month following the calendar month covered by the report.

6.9.1.6 Core Operating Limits Report (COLR)

- a. Core operating limits shall be established prior to each reload cycle or prior to any remaining portion of a reload cycle. The core operating limits shall be documented in the COLR for the following:
 1. Safety limits for thermal power, pressurizer pressure, and the highest operating loop coolant temperature (T_{avg}) for Specification 2.1,
 2. Limiting Safety System Settings for Reactor Coolant Flow-Low Loop design flow, Overtemperature ΔT , and Overpower ΔT setpoint parameter values for Specification 2.2,
 3. Moderator Temperature Coefficient BOL and EOL limits, and 300 ppm surveillance limit for Specification 3/4.1.1.3,
 4. Shutdown Bank Insertion Limit for Specification 3/4.1.3.5,
 5. Control Bank Insertion Limits for Specification 3/4.1.3.6,
 6. Axial Flux Difference limits and target band for Specification 3/4.2.1,
 7. Heat Flux Hot Channel Factor, $K(Z)$, Power Factor Multiplier, and (F_{xy}^{RTP}) for Specification 3/4.2.2,

(continued)

6.9.1.6.a (continued)

8. Nuclear Enthalpy Rise Hot Channel Factor, and Power Factor Multiplier for Specification 3/4.2.3, and
9. DNB related parameters for Reactor Coolant System T_{avg} , Pressurizer Pressure, and the Minimum Measured Reactor Coolant System Flow for Specification 3/4.2.5.

The COLR shall be maintained available in the Control Room.

- b. The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:

1. WCAP-9272-P-A, "Westinghouse Reload Safety Evaluation Methodology," July 1985 (W Proprietary).

(Methodology for Specification 3.1.1.3 - Moderator Temperature Coefficient, 3.1.3.5 - Shutdown Rod Insertion Limit, 3.1.3.6 - Control Bank Insertion Limits, 3.2.1 - Axial Flux Difference, 3.2.2 - Heat Flux Hot Channel Factor, 3.2.3 - Nuclear Enthalpy Rise Hot Channel Factor, and 3.2.5 - DNB Parameters.)

2. WCAP-12942-P-A, "Safety Evaluation Supporting a More Negative EOL Moderator Temperature Coefficient Technical Specification for the South Texas Project Electric Generating Station Units 1 and 2."

(Methodology for Specification 3.1.1.3 - Moderator Temperature Coefficient)

3. WCAP-8745-P-A, "Design Bases for the Thermal Overpower ΔT and Thermal Overtemperature ΔT Trip Functions," September 1986 (Westinghouse Proprietary Class 2).

(Methodology for Specification 2.1 - Safety Limits, and 2.2 - Limiting Safety System Settings)

4. WCAP-8385, "Power Distribution and Load Following Procedures Topical Report," September 1974 (W Proprietary).

(Methodology for Specification 3.2.1 - Axial Flux Difference (Constant Axial Offset Control).)

(continued)

6.0 ADMINISTRATIVE CONTROLS

6.9 Reporting Requirements

6.9.1.6.b (continued)

5. Westinghouse letter NS-TMA-2198, T.M. Anderson (Westinghouse) to K. Kniel (Chief of Core Performance Branch, NRC) January 31, 1980 - Attachment: Operation and Safety Analysis Aspects of an Improved Load Follow Package.

(Methodology for Specification 3.2.1 - Axial Flux Difference (Constant Axial Offset Control). Approved by NRC Supplement No. 4 to NUREG-0422, January 1981, Docket Nos. 50-369 and 50-370.)

6. NUREG-0800, Standard Review Plan, U. S. Nuclear Regulatory Commission, Section 4.3, Nuclear Design, July 1981. Branch Technical Position CPB 4.3-1, Westinghouse Constant Axial Offset Control (CAOC), Rev. 2, July 1981.

(Methodology for Specification 3.2.1 - Axial Flux Difference (Constant Axial Offset Control).)

7. WCAP-10266-P-A, Rev. 2, WCAP-11524-NP-A, Rev. 2, "The 1981 Version of the Westinghouse ECCS Evaluation Model Using the BASH Code," Kabadi, J.N., et al., March 1987; including Addendum 1-A, "Power Shape Sensitivity Studies," December 1987 and Addendum 2-A, "BASH Methodology Improvements and Reliability Enhancement," May 1988.

(Methodology for Specification 3.2.2 - Heat Flux Hot Channel Factor.)

8. WCAP-12610-P-A, "VANTAGE+ Fuel Assembly Reference Core Report," April 1995 (W Proprietary).

(Methodology for Specification 3.2.2 - Heat Flux Hot Channel Factor.)

- c. The core operating limits shall be determined so that all applicable limits (e.g., fuel thermal-mechanical limits, core thermal-hydraulic limits, Emergency Core Cooling System (ECCS) limits, nuclear limits such as shutdown margin, transient analysis limits, and accident analysis limits) of the safety analysis are met.
- d. The COLR, including any mid-cycle revisions or supplements, shall be provided to the NRC upon issuance for each reload cycle.

6.9.2 Not Used

6.0 ADMINISTRATIVE CONTROLS
6.10 Through 6.11 Unused Specifications

6.10 Not Used

6.11 Not Used

6.0 ADMINISTRATIVE CONTROLS

6.12 High Radiation Area

- 6.12.1 Pursuant to 10 CFR 20.1601(c), in lieu of the requirements of 20.1601(a), each high radiation area, as defined in 10 CFR 20, in which the intensity of radiation is greater than 100 mrem/hr but equal to or less than 1000 mrem/hr at 30 cm (12 in.) from the radiation source or from any surface which the radiation penetrates shall be barricaded and conspicuously posted as a high radiation area and entrance thereto shall be controlled by Radiation Work Permit (RWP). Individuals qualified in radiation protection procedures (e.g., radiation protection technician) or personnel continuously escorted by such individuals may be exempt from the RWP issuance requirement during the performance of their assigned duties in high radiation areas with radiation levels equal to or less than 1000 mrem/h, provided they are otherwise following plant radiation protection procedures for entry into such high radiation areas.

Any individual or group of individuals permitted to enter such areas shall be provided with or accompanied by one or more of the following:

- a. A radiation monitoring device which continuously indicates the radiation dose rate in the area.
- b. A radiation monitoring device which continuously integrates the radiation dose rate in the area and alarms when a preset integrated dose is received. Entry into such areas with this monitoring device may be made after the dose rate levels in the area have been established and individuals have been made knowledgeable of them.
- c. An individual qualified in radiation protection procedures with a radiation dose rate monitoring device, who is responsible for providing positive control over the activities within the area and shall perform periodic radiation surveillance at the frequency specified in the RWP.

- 6.12.2 In addition to the requirements of Specification 6.12.1, areas accessible to individuals with radiation levels greater than 1000 mrem/hr at 30 cm (12 in.) but less than 500 Rads in one hour at one meter from the radiation source or from any surface which the radiation penetrates shall be provided with locked or continuously guarded doors to prevent unintentional entry. The keys to the doors shall be maintained under the administrative control of the shift manager on duty or radiation protection. Doors shall remain locked except during periods of access by individuals under an approved RWP. Prior to entry, individuals shall be informed of the dose rate levels in the immediate work areas and the maximum allowable stay time for individuals in that area, or be accompanied by an individual qualified in radiation protection procedures with a radiation dose rate monitoring device. In lieu of the stay time specification, direct or remote (such as closed circuit TV cameras) continuous surveillance may be made by individuals qualified in radiation protection procedures to provide positive exposure control over the activities being performed within the area.

(continued)

6.0 ADMINISTRATIVE CONTROLS

6.12 High Radiation Area

6.12.2 (continued)

For individual high radiation areas with radiation levels greater than 1000 mrem/hr, accessible to personnel, that are located within large areas, such as reactor containment, where no enclosure exists for purposes of locking, or that cannot be continuously guarded, and where no enclosure can be reasonably constructed around the individual area, that individual area shall be barricaded, conspicuously posted, and a flashing light shall be activated as a warning device.

6.0 ADMINISTRATIVE CONTROLS
6.13 Through 6.14 Unused Specifications

6.13 Not Used

6.14 Not Used

**THE FOLLOWING PAGES REFLECT CHANGES IN OTHER SECTIONS OF THE
TECHNICAL SPECIFICATIONS CAUSED BY CHANGES TO
TECHNICAL SPECIFICATION 6.0, ADMINISTRATIVE CONTROLS**

DEFINITIONS

MASTER RELAY TEST

1.17 A MASTER RELAY TEST shall be the energization of each master relay and verification of OPERABILITY of each relay. The MASTER RELAY TEST shall include a continuity check of each associated slave relay.

MEMBER(S) OF THE PUBLIC

1.18 MEMBER(S) OF THE PUBLIC means an individual in a controlled area or UNRESTRICTED AREA. However, an individual is not a member of the public during any period in which the individual receives an occupational dose.

1.19 Not Used

OPERABLE - OPERABILITY

1.20 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s), and when all necessary attendant instrumentation, controls, electrical power, cooling or seal water, lubrication or other auxiliary equipment that are required for the system, subsystem, train, component, or device to perform its function(s) are also capable of performing their related support function(s).

OPERATIONAL MODE - MODE

1.21 An OPERATIONAL MODE (i.e., MODE) shall correspond to any one inclusive combination of core reactivity condition, power level, and average reactor coolant temperature specified in Table 1.2.

PHYSICS TESTS

1.22 PHYSICS TESTS shall be those tests performed to measure the fundamental nuclear characteristics of the reactor core and related instrumentation: (1) described in Chapter 14.0 of the FSAR, (2) authorized under the provisions of 10 CFR 50.59, or (3) otherwise approved by the Commission.

PRESSURE BOUNDARY LEAKAGE

1.23 PRESSURE BOUNDARY LEAKAGE shall be leakage (except steam generator tube leakage) through a nonisolable fault in a Reactor Coolant System component body, pipe wall, or vessel wall.

DEFINITIONS

1.24 Not Used

PURGE - PURGING

1.25 PURGE or PURGING shall be any controlled process of discharging air or gas from a confinement to maintain temperature, pressure, humidity, concentration or other operating condition, in such a manner that replacement air or gas is required to purify the confinement.

QUADRANT POWER TILT RATIO

1.26 QUADRANT POWER TILT RATIO shall be the ratio of the maximum upper excore detector calibrated output to the average of the upper excore detector calibrated outputs, or the ratio of the maximum lower excore detector calibrated output to the average of the lower excore detector calibrated outputs, whichever is greater. With one excore detector inoperable, the remaining three detectors shall be used for computing the average.

RATED THERMAL POWER

1.27 RATED THERMAL POWER shall be a total reactor core heat transfer rate to the reactor coolant of 3800 MWt.

REACTOR TRIP SYSTEM RESPONSE TIME

1.28 The REACTOR TRIP SYSTEM RESPONSE TIME shall be the time interval from when the monitored parameter exceeds its Trip Setpoint at the channel sensor until loss of stationary gripper coil voltage.

REPORTABLE EVENT

1.29 A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 of 10 CFR Part 50.

SHUTDOWN MARGIN

1.30 SHUTDOWN MARGIN shall be the instantaneous amount of reactivity by which the reactor is subcritical or would be subcritical from its present condition assuming all full-length rod cluster assemblies (shutdown and control) are fully inserted except for the single rod cluster assembly of highest reactivity worth which is assumed to be fully withdrawn.

2.0 SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS

2.1 SAFETY LIMITS

REACTOR CORE

2.1.1 The combination of THERMAL POWER, pressurizer pressure, and the highest operating loop coolant temperature (T_{avg}) shall not exceed the limits shown in the Core Operating Limits Report.

2.1.1.1 In MODES 1 and 2, the departure from nucleate boiling ratio (DNBR) shall be maintained ≥ 1.17 for the WRB-1 DNB correlation.

2.1.1.2 In MODES 1 and 2, the peak fuel centerline temperature shall be maintained $< 5080^{\circ}\text{F}$, decreasing by 58°F per 10,000 MWD/MTU of burnup.

APPLICABILITY: MODES 1 and 2.

ACTION:

Whenever the point defined by the combination of the highest operating loop average temperature and THERMAL POWER has exceeded the appropriate pressurizer pressure line, be in HOT STANDBY within 1 hour, and comply with the requirements of 10 CFR 50.36(c)(1).

REACTOR COOLANT SYSTEM PRESSURE

2.1.2 The Reactor Coolant System pressure shall not exceed 2735 psig.

APPLICABILITY: MODES 1, 2, 3, 4, AND 5.

ACTION:

MODES 1 and 2:

Whenever the Reactor Coolant System pressure has exceeded 2735 psig, be in HOT STANDBY with the Reactor Coolant System pressure within its limit within 1 hour, and comply with the requirements of 10 CFR 50.36(c)(1).

MODES 3, 4 and 5:

Whenever the Reactor Coolant System pressure has exceeded 2735 psig, reduce the Reactor Coolant System pressure to within its limit within 5 minutes, and comply with the requirements of 10 CFR 50.36(c)(1).

REACTIVITY CONTROL SYSTEMS

MODERATOR TEMPERATURE COEFFICIENT

LIMITING CONDITION FOR OPERATION

3.1.1.3 The moderator temperature coefficient (MTC) shall be within the limits specified in the Core Operating Limits Report (COLR). The maximum upper limit shall be less than or equal to that shown in Figure 3.1-2a.

APPLICABILITY: Beginning of Life (BOL) limit - MODES 1 and 2* only**.
End of Life (EOL) limit - MODES 1, 2, and 3 only**.

ACTION:

- a. With the MTC more positive than the BOL limit specified in the COLR, operation in MODES 1 and 2 may proceed provided:
 1. Control rod withdrawal limits are established and maintained sufficient to restore the MTC to less positive than the BOL limit specified in the COLR within 24 hours or be in HOT STANDBY within the next 6 hours. These withdrawal limits shall be in addition to the insertion limits of Specification 3.1.3.6;
 2. The control rods are maintained within the withdrawal limits established above until a subsequent calculation verifies that the MTC has been restored to within its limit for the all rods withdrawn condition; and
 3. A Special Report is submitted within 10 days, describing the value of the measured MTC, the interim control rod withdrawal limits, and the predicted average core burnup necessary for restoring the positive MTC to within its limit for the all rods withdrawn condition.
- b. With the MTC more negative than the EOL limit specified in the COLR, be in HOT SHUTDOWN within 12 hours.

*With K_{eff} greater than or equal to 1.

**See Special Test Exceptions Specification 3.10.3.

INSTRUMENTATION

REMOTE SHUTDOWN SYSTEM

LIMITING CONDITION FOR OPERATION

3.3.3.5 This Remote Shutdown System transfer switches, power, controls and monitoring instrumentation channels shown in Table 3.3-9 shall be OPERABLE.

APPLICABILITY: MODES 1, 2, and 3.

ACTION:

- a. With the number of OPERABLE remote shutdown monitoring channels, transfer switches, power or control circuits less than the Minimum Channels OPERABLE as required by Table 3.3-9, restore the inoperable channel(s) to OPERABLE status within 7 days, or be in HOT SHUTDOWN within the next 12 hours.
- b. With the number of OPERABLE remote shutdown monitoring channels, transfer switches, power or control circuits less than the Total Number of Channels as required by Table 3.3-9, within 60 days restore the inoperable channel(s) to OPERABLE status or, submit a Special Report that defines the corrective action to be taken.
- c. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.5.1 Each remote shutdown monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-6.

4.3.3.5.2 Each Remote Shutdown System transfer switch, power and control circuit including the actuated components, shall be demonstrated OPERABLE at least once per 18 months.

TABLE 3.3-10 (Continued)

ACTION STATEMENTS (Continued)

- ACTION 39 - a. With the number of OPERABLE channels one less than the Total Number of Channels requirements, restore one inoperable channel to OPERABLE status within 7 days, or be in at least HOT SHUTDOWN within the next 12 hours.
- b. With the number of OPERABLE channels less than the Minimum Channels Operable requirements, restore at least one inoperable channel to OPERABLE status within 72 hours, or be in at least HOT SHUTDOWN within the next 12 hours.
- ACTION 40 - With the number of OPERABLE channels less than the Minimum Channels Operable requirements, restore at least one inoperable channel to OPERABLE status within 72 hours, or be in at least HOT SHUTDOWN within the next 12 hours.
- ACTION 41 - a. With the number of OPERABLE channels one less than the Required Number of Channels, either restore the system to OPERABLE status within 7 days if repairs are feasible without shutting down or submit a Special Report within 30 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status.
- b. With the number of OPERABLE Channels one less than the Minimum Channels OPERABLE in Table 3.3-10, either restore the inoperable channel(s) to OPERABLE status within 48 hours if repairs are feasible without shutting down or:
1. Initiate an alternate method of monitoring the reactor vessel inventory;
 2. Submit a Special Report within 30 days following the event outlining the action taken, the cause of the inoperability and the plans and schedule for restoring the system to OPERABLE status; and
 3. Restore the system to OPERABLE status at the next scheduled refueling.
- ACTION 42 - a. With one required channel inoperable, restore the required channel to OPERABLE status within 30 days; otherwise, a Special Report shall be submitted within the next 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels to OPERABLE status.
- b. With two required channels inoperable, restore one required channel to OPERABLE status within 7 days; otherwise, be in HOT STANDBY within 6 hours, and in HOT SHUTDOWN in the next 6 hours.

INSTRUMENTATION

EXPLOSIVE GAS MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.3.3.11 The explosive gas monitoring instrumentation channels shown in Table 3.3-13 shall be OPERABLE with their Alarm/Trip Setpoints set to ensure that the limits of Specification 3.11.2.5 are not exceeded.

APPLICABILITY: As shown in Table 3.3-13

ACTION:

- a. With an explosive gas monitoring instrumentation channel Alarm/Trip Setpoint less conservative than required by the above specification, declare the channel inoperable and take the ACTION shown in Table 3.3-13.
- b. With less than the minimum number of explosive gas monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.3-13. Restore the inoperable instrumentation to OPERABLE status within 30 days and, if unsuccessful submit a Special Report to explain why this inoperability was not corrected in a timely manner.
- c. The provisions of Specification 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.11 Each explosive gas monitoring instrumentation channel shall be demonstrated OPERABLE by performance of the CHANNEL CHECK, CHANNEL CALIBRATION and ANALOG CHANNEL OPERATIONAL TEST or DIGITAL CHANNEL OPERATIONAL TEST, as applicable, at the frequencies shown in Table 4.3-9.

REACTOR COOLANT SYSTEM

STEAM GENERATORS

SURVEILLANCE REQUIREMENTS (Continued)

- b. The steam generator shall be determined OPERABLE after completing the corresponding actions [plug or (for Model E steam generators only) repair all tubes exceeding the plugging or repair limit and all tubes containing through-wall cracks] required by Table 4.4-2 and Table 4.4-3.

4.4.5.5 Reports

- a. Within 15 days following the completion of each inservice inspection of steam generator tubes, the number of tubes plugged or repaired in each steam generator shall be reported in a Special Report;
- b. The complete results of the steam generator tube inservice inspection shall be submitted in a Special Report within 12 months following the completion of the inspection. This Special Report shall include:
 - 1) Number and extent of tubes inspected,
 - 2) Location and percent of wall-thickness penetration for each indication of an imperfection, and
 - 3) Identification of tubes plugged or repaired.
- c. Results of steam generator tube inspections which fall into Category C-3 shall be reported in a Special Report within 30 days and prior to resumption of plant operation. This report shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence.
- d. For Model E steam generators, implementation of the voltage-based repair criteria to tube support plate intersections, notify the Staff prior to returning the steam generators to service should any of the following conditions arise:
 - 2) If estimated leakage based on the projected end-of-cycle (or if not practical, using the actual measured end-of-cycle) voltage distribution exceeds the leak limit (determined from the licensing basis dose calculation for the postulated main steam line break) for the next operating cycle. The calculation(s) shall be done using:
 - a) The methodology of Generic Letter 95-05 for intersections at the flow distribution baffles, at the applicable cold leg support plates, and at the hot leg support plates L through R; and

REACTOR COOLANT SYSTEM

OVERPRESSURE PROTECTION SYSTEMS

LIMITING CONDITION FOR OPERATION

- 3.4.9.3 An Overpressure Protection System shall be OPERABLE with a maximum of one centrifugal charging pump capable of injecting into the RCS and the emergency core cooling system (ECCS) accumulators isolated and either a. or b. below:
- Two power-operated relief valves (PORVs) with lift settings which do not exceed the limit established in Figure 3.4-4, or
 - The Reactor Coolant System (RCS) depressurized with an RCS vent of greater than or equal to 2.0 square inches.

APPLICABILITY: MODES 4 and 5, and MODE 6 when the head is on the reactor vessel¹.

ACTION:

- With one or more ECCS accumulators not isolated, isolate the ECCS accumulator(s) within 1 hour.
- With more than one centrifugal charging pump capable of injecting into the RCS, immediately initiate action to render all but one centrifugal charging pump incapable of injecting into the RCS².
- With one PORV inoperable in MODE 4, restore the inoperable PORV to OPERABLE status within 7 days or depressurize and vent the RCS through at least a 2.0 square inch vent within the next 8 hours.
- With one PORV inoperable in MODES 5 or 6 with the head on the reactor vessel, restore the inoperable PORV to OPERABLE status within 24 hours, or complete depressurization and venting of the RCS through at least a 2.0 square inch vent within the next 8 hours³.
- With both PORVs inoperable, depressurize and vent the RCS through at least a 2.0 square inch vent within 8 hours³.
- In the event either the PORVs or the RCS vent(s) are used to mitigate an RCS pressure transient, a Special Report shall be submitted within 30 days. The report shall describe the circumstances initiating the transient, the effect of the PORVs or RCS vent(s) on the transient, and any corrective action necessary to prevent recurrence.
- The provisions of Specification 3.0.4 are not applicable.

EMERGENCY CORE COOLING SYSTEMS

3/4.5.2 ECCS SUBSYSTEMS - T_{AVG} GREATER THAN OR EQUAL TO 350°F

LIMITING CONDITION FOR OPERATION

3.5.2 Three independent Emergency Core Cooling System (ECCS) subsystems shall be OPERABLE with each subsystem comprised of:

- a. One OPERABLE High Head Safety Injection pump,
- b. One OPERABLE Low Head Safety Injection pump,
- c. One OPERABLE RHR heat exchanger, and
- d. An OPERABLE flow path capable of taking suction from the refueling water storage tank on a Safety Injection signal and automatically transferring suction to the containment sump during the recirculation phase of operation through a High Head Safety Injection pump and into the Reactor Coolant System and through a Low Head Safety Injection pump and its respective RHR heat exchanger into the Reactor Coolant System.

APPLICABILITY: MODES 1, 2, and 3.*

ACTION:

- a. With less than the above subsystems OPERABLE, but with at least two High Head Safety Injection pumps in an OPERABLE status, two Low Head Safety Injection pumps and associated RHR heat exchangers in an OPERABLE status, and sufficient flow paths to accommodate these OPERABLE Safety Injection pumps and RHR heat exchangers, ** restore the inoperable subsystem(s) to OPERABLE status within 7 days or be in at least HOT STANDBY within the next 6 hours and in HOT SHUTDOWN within the following 6 hours.
- b. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be submitted within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date. The current value of the usage factor for each affected Safety Injection nozzle shall be provided in this Special Report whenever its value exceeds 0.70.

*The provisions of Specifications 3.0.4 and 4.0.4 are not applicable for entry into MODE 3 for the Safety Injection pumps declared inoperable pursuant to Specification 4.5.3.1.2 provided that the Safety Injection pumps are restored to OPERABLE status within 4 hours or prior to the temperature of one or more of the RCS cold legs exceeding 375°F, whichever comes first.

**Verify required pumps, heat exchangers and flow paths OPERABLE every 48 hours.

EMERGENCY CORE COOLING SYSTEMS

3/4.5.3 ECCS SUBSYSTEMS - T_{avg} LESS THAN 350°F

LIMITING CONDITION FOR OPERATION

3.5.3.1 As a minimum, the following ECCS components shall be OPERABLE:

- a. Two OPERABLE High Head Safety Injection pumps,*
- b. Two OPERABLE Low Head Safety Injection pumps and their associated RHR heat exchangers, and
- c. Two OPERABLE flow paths capable of taking suction from the refueling water storage tank upon being manually realigned and transferring suction to the containment sump during the recirculation phase of operation through a High Head Safety Injection pump and into the Reactor Coolant System and through a Low Head Safety Injection pump and its respective RHR heat exchanger into the Reactor Coolant System.

APPLICABILITY: MODE 4.

ACTION:

- a. With less than the above-required ECCS components OPERABLE because of the inoperability of either the High Head Safety Injection pumps or the flow paths from the refueling water storage tank, restore at least the required ECCS components to OPERABLE status within 1 hour or be in COLD SHUTDOWN within the next 20 hours.
- b. With less than the above-required ECCS components OPERABLE because of the inoperability of either the residual heat removal heat exchangers or the Low Head Safety Injection pumps, restore at least the required ECCS components to OPERABLE status or maintain the Reactor Coolant System T_{avg} less than 350°F by use of alternate heat removal methods.
- c. In the event the ECCS is actuated and injects water into the Reactor Coolant System, a Special Report shall be submitted within 90 days describing the circumstances of the actuation and the total accumulated actuation cycles to date. The current value of the usage factor for each affected Safety Injection nozzle shall be provided in this Special Report whenever its value exceeds 0.70.

*A maximum of one High Head Safety Injection pump shall be OPERABLE and a second High Head Safety Injection pump shall be OPERABLE except that its breaker shall be racked out (the third HHSI pump shall have its breaker racked out) within: (1) 4 hours after entering MODE 4 from MODE 3 or prior to the temperature of one or more of the RCS cold legs decreasing below 325°F, whichever comes first; or (2) 4 hours after entering MODE 4 from MODE 5 or prior to the temperature of one or more of the RCS cold legs exceeding 225°F, whichever comes first.

CONTAINMENT SYSTEMS

CONTAINMENT STRUCTURAL INTEGRITY

LIMITING CONDITION FOR OPERATION

3.6.1.6 The structural integrity of the containment(s) shall be maintained at a level consistent with the acceptance in Specification 4.6.1.6.

APPLICABILITY: MODES 1, 2, 3, and 4.

ACTION:

- a. With the abnormal degradation indicated by the conditions in Specification 4.6.1.6.1a.4, restore the containment(s) to the required level of integrity or verify that containment integrity is maintained within 72 hours and perform an engineering evaluation of the containment(s) and provide a Special Report within 15 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours.
- b. With the indicated abnormal degradation of the structural integrity other than ACTION a. at a level below the acceptance criteria of Specification 4.6.1.6, restore the containment(s) to the required level of integrity or verify that containment integrity is maintained within 15 days, perform an engineering evaluation of the containment(s) and provide a Special Report within 30 days or be in at least HOT STANDBY within the next 6 hours and in COLD SHUTDOWN within the following 30 hours. The provisions of Specification 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.6.1.6 CONTAINMENT PRESTRESSING SYSTEM

The structural integrity of the prestressing tendons of the containment shall be demonstrated at the end of 1, 3, and 5 years following the initial containment structural integrity test and at 5-year intervals thereafter. The inspection schedule for lift-off testing shall be as shown in Figure 4.6-1.

4.6.1.6.1 The adequacy of prestressing forces in tendons shall be demonstrated by:

- a. Determining that a random but representative sample of at least 10 tendons (6 hoop, 4 interverted U) each have an observed lift-off force within predicted limits established for each tendon. For each subsequent inspection, one tendon from each group shall be kept unchanged to develop a history and to correlate the observed data. The procedure of inspection and the tendon acceptance criteria shall be as follows:

ELECTRICAL POWER SYSTEMS

LIMITING CONDITION FOR OPERATION

ACTION (continued)

- g. With one or more diesel generator fuel oil storage tanks with stored fuel oil total particulates not within the Diesel Fuel Oil Testing Program limits, within 7 days restore the fuel oil total particulates within limits, or declare the associated standby diesel generator(s) inoperable.
- h. With one or more diesel generator fuel oil storage tanks with new fuel oil properties not within the Diesel Fuel Oil Testing Program limits, within 30 days restore the fuel oil properties within limits, or declare the associated standby diesel generator(s) inoperable.