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LR-N05-0266
LCR H05-10

PSEG Nuclear LLC

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

**REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS
CORRECTION OF CONTAINMENT REQUIREMENTS DURING HANDLING OF IRRADIATED FUEL AND CORE ALTERATIONS
HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354**

In accordance with the provisions of 10 CFR 50.90, PSEG Nuclear LLC (PSEG) hereby transmits a request for amendment of the Technical Specifications (TS) for Hope Creek Generating Station (Hope Creek). In accordance with 10 CFR 50.91(b)(1), a copy of this submittal has been sent to the State of New Jersey.

Amendment 146 was issued on April 15, 2003. This amendment makes use of alternate source term to relax containment isolation requirements for the fuel-handling accident. Amendment 156, issued on October 28, 2004, and corrected on October 29, 2004, revised errors associated with amendment 146. The attached request revises TS to address inconsistencies discovered during implementation of Amendment 156. This will bring the Hope Creek TS into conformance with NRC-approved Revision 2 to Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-51, "Revise Containment Requirements During Handling Irradiated Fuel and Core Alterations", and to be consistent with NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4" (STS). Although compliance to the approved changes could be met, the specifications added unnecessary confusion during application and warrant correction. PSEG has ensured that all changes have been included in this submittal.

Attachment 1 provides a description of the proposed changes. Attachment 2 provides the existing TS pages marked up to show the proposed changes.

Approval of this proposed change is being requested by March 2006 to be implemented within 60 days to support Refueling Outage 13 currently scheduled to begin in April 2006.

A001

Should you have any questions regarding this request, please contact Mr. Steve Mannon at (856) 339-1129.

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

Executed on 10/7/05
(Date)

Sincerely,

George P. Barnes

George P. Barnes
Site Vice President
Hope Creek Generating Station

Attachments (2)

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HOPE CREEK GENERATING STATION
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REQUEST FOR CHANGE TO TECHNICAL SPECIFICATIONS CORRECTION OF CONTAINMENT REQUIREMENTS DURING HANDLING OF IRRADIATED FUEL AND CORE ALTERATIONS

1. DESCRIPTION

The proposed amendment requests additional changes and corrections to bring the Hope Creek Generating Station (Hope Creek) Technical Specifications (TS) into conformance with NRC-approved Revision 2 to Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-51, "Revise Containment Requirements During Handling Irradiated Fuel and Core Alterations", and to be consistent with NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4" (STS). These changes were not included in our submittal of December 12, 2003 (reference 7.6).

2. PROPOSED CHANGE

The proposed changes would revise TS 3.6.5.3.1 FRVS Ventilation System, 3.6.5.3.2 FRVS Recirculation System, 3.7.1.2 Service Water, 3.8.1.2 A.C. Sources – Shutdown, 3.8.2.2 D.C. Sources – Shutdown, and 3.8.3.2 Distribution – Shutdown.

Specifically:

a. ACTION requirement b. of TS 3.6.5.3.1 and 3.6.5.3.2 is revised to change "or" to "and" between containment and operations.

b. Revise TS 3.7.1.2 footnote * to add "recently" between handling and irradiated.

c. ACTION requirement a. of TS 3.8.1.2, 3.8.2.2, and 3.8.3.2 is revised to add "CORE ALTERATIONS" between suspend and handling.

d. ACTION requirement b. of TS 3.8.3.2 is revised to add "recently" between of and irradiated.

3. BACKGROUND

PSEG Nuclear LLC (PSEG) by letters dated June 28, 2002, (reference 7.2), December 18, 2002, (reference 7.3), January 18, 2003, (reference 7.4), and February 25, 2003, (reference 7.5), submitted a request for changes to the Hope Creek TS. The NRC staff approved the licensee's proposed changes in Amendment No. 146, issued April 15, 2003, (reference 7.7).

By letter dated December 12, 2003 (reference 7.6), PSEG requested additional Hope Creek TS changes that should have been requested in the changes approved in Amendment No. 146. Previously omitted changes were included in that submittal that revised the applicability requirements necessary for consistency with TSTF-51. The NRC staff approved the licensee's proposed changes in Amendment No. 156 (reference 7.8), issued October 28, 2004, and as amended on October 29, 2004.

The changes being submitted with this LCR were discovered by PSEG during implementation of Amendment 156. Deficiencies associated with Amendment 156 were entered into the PSEG corrective action process and an extensive review was performed to determine if any additional changes were necessary. All requisite changes are incorporated with this request.

4. TECHNICAL ANALYSIS

The NRC issued Amendment 146 on April 15, 2003. As documented in the NRC Safety Evaluation Report (SER), the staff evaluated the proposed changes to the TS and determined that they did not result in doses in excess of a small percentage of the limits of 10 CFR 50.67. They also concluded that the changes to the TS do not result in doses that will exceed the guidance of GDC 19. The staff also determined that the proposed changes to the TS were consistent with the TSTF-51, Revision 2, and STS. Those proposed changes were, therefore, acceptable.

Subsequent to Amendment 146 the NRC issued Amendment 156. The NRC staff previously accepted PSEG's analyses of the radiological consequences for the Hope Creek design-basis Fuel Handling Accident (FHA) and design-basis LOCA. The changes proposed in that application relied on the NRC staff's previous conclusion that these analyses were acceptable. The NRC staff verified that the proposed changes were consistent with TSTF-51 and STS.

The proposed changes contained in this request do not change the basis of the previously submitted requests. Therefore, these changes do not affect the NRC's previous conclusion that these analyses are acceptable.

5. REGULATORY SAFETY ANALYSIS

5.1 No Significant Hazards Consideration Determination

PSEG Nuclear LLC (PSEG) has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

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

   Response: No.

   The proposed changes would revise Technical Specifications (TS) 3.6.5.3.1, FRVS Ventilation System, and 3.6.5.3.2, FRVS Recirculation System, ACTION b from, "...containment or operations..." to read "...containment and operations..." to be consistent with NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4" (STS). Technical Specification 3.7.1.2, Service Water, and 3.8.3.2, Distribution – Shutdown, require the addition of "recently" to modify irradiated fuel consistent with NRC-approved Revision 2 to Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-51, "Revise Containment Requirements During Handling Irradiated Fuel and Core Alterations." Technical Specifications 3.8.1.2, A.C. Sources – Shutdown, 3.8.2.2, D.C. Sources – Shutdown, and 3.8.3.2, Distribution – Shutdown, require that "CORE ALTERATIONS" be added to ACTION a.

   The proposed changes associated with the fuel handling accident (FHA) do not involve a change to structures, components, or systems that would affect the probability of an accident previously evaluated in the Hope Creek Updated Final Safety Analysis Report (UFSAR). The FHA for Hope Creek is defined as a drop of a fuel assembly over irradiated assemblies in the reactor core 24 hours after reactor shutdown. 10 CFR 50.67, "Accident Source Term" (AST), was used to evaluate the dose consequences of a postulated accident. The FHA has been analyzed without credit for Secondary Containment; Filtration, Recirculation and Ventilation System (FRVS); and CREF system. The resultant radiological consequences are within the acceptance criteria set forth in 10 CFR 50.67 and Regulatory Guide (RG) 1.183. This amendment does not alter the methodology or equipment used in fuel handling operations. The equipment hatch, personnel air locks, other containment penetrations, or any component thereof is not an accident initiator. Actual fuel handling operations are not affected by the proposed changes.

   Consequently the probability of a previously analyzed FHA is not affected by the proposed amendment. No other accident initiator is affected by the proposed changes.

   Therefore, this proposed amendment does not involve a significant increase in the probability of occurrence or radiological consequences of an accident previously analyzed.

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

   Response: No

   The proposed changes would revise TS 3.6.5.3.1, FRVS Ventilation System and 3.6.5.3.2, FRVS Recirculation System, ACTION b from, "...containment or operations..." to read "...containment and operations..." to be consistent with NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4" (STS). TS 3.7.1.2, Service Water, and 3.8.3.2, Distribution – Shutdown, require the addition of "recently" to modify irradiated fuel consistent with NRC-approved Revision 2 to Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-51, "Revise Containment Requirements During Handling Irradiated Fuel and Core Alterations." TS 3.8.1.2 A.C. Sources – Shutdown, 3.8.2.2, D.C. Sources – Shutdown, and 3.8.3.2, Distribution – Shutdown, require that "CORE ALTERATIONS" be added to ACTION a.

   The proposed amendment will not create the possibility of a new or different type of accident from any accident previously evaluated because changes to the allowable activity in the primary and secondary systems do not result in changes to the design or operation of these systems. The evaluation of the proposed changes indicates that all design standard and applicable safety criteria limits are met. Equipment important to safety will continue to operate as designed. Component integrity is not challenged. The changes do not result in any event previously deemed incredible being made credible. The changes do not result in more adverse conditions or result in any increase in the challenges to safety systems. The systems affected by the changes are used to mitigate the consequences of a potential accident and would not create the possibility of a new or different kind of accident from any previously evaluated.

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

   Response: No

   The proposed changes would revise TS 3.6.5.3.1, FRVS Ventilation System and 3.6.5.3.2 FRVS Recirculation System, ACTION b from, "...containment or operations..." to read "...containment and operations..." to be consistent with NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4" (STS). TS 3.7.1.2, Service Water, and 3.8.3.2, Distribution – Shutdown, require the addition of "recently" to modify irradiated fuel consistent with NRC-approved Revision 2 to Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-51, "Revise Containment Requirements During Handling Irradiated Fuel and Core Alterations." TS 3.8.1.2 A.C. Sources – Shutdown, 3.8.2.2 D.C. Sources – Shutdown, and 3.8.3.2 Distribution – Shutdown, require that "CORE ALTERATIONS" be added to ACTION a.

The proposed changes revise the TS operational conditions where specific activities represent situations during which significant radioactive releases can be postulated. These operational conditions are consistent with the design basis analysis and are established such that the radiological consequences remain at or below the regulatory guidelines. Safety margins and analytical conservatisms are retained to ensure that the analysis adequately bounds all postulated event scenarios. The proposed TS continue to ensure that the total effective dose equivalent (TEDE) for the control room (CR), the exclusion area boundary (EAB), and low population zone (LPZ) boundaries are below the corresponding acceptance criteria specified in 10 CFR 50.67 and RG 1.183.

Therefore, these changes do not involve a significant reduction in margin of safety.

Based on the above, PSEG concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

The proposed changes are consistent with NRC-approved Revision 2 to Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-51, "Revise Containment Requirements During Handling Irradiated Fuel and Core Alterations", and with NUREG-1433, "Standard Technical Specifications General Electric Plants, BWR/4." As documented in the NRC safety evaluation reports (SER) for amendments 146 and 156, the NRC staff evaluated the proposed changes to the TS and determined that they did not result in doses in excess of a small percentage of the limits of 10 CFR 50.67. They also concluded that the TS changes do not result in doses that will exceed the GDC 19 guidance. The NRC staff determined that the proposed TS changes were consistent with TSTF-51, Revision 2, and STS. The proposed changes in the present application rely on the NRC staff's previous conclusion that these analyses are acceptable.

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

6. ENVIRONMENTAL IMPACT EVALUATION

PSEG has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted

area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluent that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

7. REFERENCES

7.1. Technical Specification Task Force (TSTF) Standard Technical Specification Change Traveler, TSTF-51A, "Revise Containment Requirements During Handling Irradiated Fuel and Core Alterations," Revision 2, dated November 1, 1999.

7.2. Letter LR-N02-0002, Request For Change To Technical Specifications Relaxation Of Secondary Containment Operability Requirements And Elimination Of FRVS Recirculation Charcoal Filters dated June 28, 2002.

7.3. Letter LR-N02-0416, Request For Additional Information Regarding Relaxation Of Secondary Containment Operability Requirements And Elimination Of FRVS Recirculation Charcoal Filters, dated December 18, 2002.

7.4. Letter LR-N03-0003, Request For Change To Technical Specifications Relaxation of Secondary Containment Operability Requirements and Elimination of FRVS Recirculation Charcoal Filters, dated January 18, 2003.

7.5. Letter LR-N03-0085, Hope Creek Generating Station – Request For Additional Information Regarding Relaxation Of Containment Operability Requirements (TAC NO. MB5548) dated February 25, 2003.

7.6. Letter LR-N03-0418, Request For Change To Technical Specifications Control Room Emergency Filtration System Hope Creek Generating Station dated December 12, 2003.

7.7. Hope Creek License Amendment 146 dated April 15, 2003.

7.8. Hope Creek License Amendment 156 dated October 28, 2004 and corrected October 29, 2004.

HOPE CREEK GENERATING STATION
FACILITY OPERATING LICENSE NPF-57
DOCKET NO. 50-354
REVISIONS TO THE TECHNICAL SPECIFICATIONS (TS)

TECHNICAL SPECIFICATION PAGE WITH PROPOSED CHANGE

The following are marked-up Technical Specifications for Facility Operating License NPF-57 affected by this change request:

Technical Specification	Page
3/4.3.6.5.3	3/4 6-51
3/4.3.6.5.3	3/4 6-52a
3/4.3.7.1.2	3/4 7-4
3/4.3.8.1.2	3/4 8-11
3/4.3.8.2.2	3/4 8-17
3/4.3.8.3.2	3/4 8-23

3.6.5.3 FILTRATION, RECIRCULATION AND VENTILATION SYSTEM (FRVS)
FRVS VENTILATION SUBSYSTEM

LIMITING CONDITION FOR OPERATION

3.6.5.3.1 Two FRVS ventilation units shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3 and *.

ACTION:

a. With one of the above required FRVS ventilation units inoperable, restore the inoperable unit to OPERABLE status within 7 days, or:

   1. In OPERATIONAL CONDITION 1, 2 or 3, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

   2. In Operational Condition *, place the OPERABLE FRVS ventilation unit in operation or suspend handling of recently irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.3 are not applicable.

b. With both ventilation units inoperable in Operational Condition *, suspend handling of recently irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.3. are not applicable.

SURVEILLANCE REQUIREMENTS

4.6.5.3.1 Each of the two ventilation units shall be demonstrated OPERABLE:

a. At least once per 14 days by verifying that the water seal bucket traps have a water seal and making up any evaporative losses by filling the traps to the overflow.

b. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and charcoal adsorbers and verifying that the subsystem operates for at least 15 minutes.

*When recently irradiated fuel is being handled in the secondary containment and during operations with a potential for draining the reactor vessel.

3.6.5.3 FILTRATION, RECIRCULATION AND VENTILATION SYSTEM (FRVS)
FRVS RECIRCULATION SUBSYSTEM

LIMITING CONDITION FOR OPERATION

3.6.5.3.2 Six FRVS recirculation units shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, 3 and *.

ACTION:

a. With one or two of the above required FRVS recirculation units inoperable, restore all the inoperable unit(s) to OPERABLE status within 7 days, or:

   1. In OPERATIONAL CONDITION 1, 2, or 3, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

   2. In Operational Condition *, suspend handling of recently irradiated fuel in the secondary containment or operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.3 are not applicable.

b. With three or more of the above required FRVS recirculation units inoperable in Operational Condition *, suspend handling of recently irradiated fuel in the secondary containment ~~or~~ and operations with a potential for draining the reactor vessel. The provisions of Specification 3.0.3 are not applicable.

c. With three or more of the above required FRVS recirculation units inoperable in OPERATIONAL CONDITION 1, 2, or 3, be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.5.3.2 Each of the six FRVS recirculation units shall be demonstrated OPERABLE:

a. At least once per 14 days by verifying that the water seal bucket traps have a water seal and making up any evaporative losses by filling the traps to the overflow.

b. At least once per 31 days by initiating, from the control room, flow through the HEPA filters and verifying that the subsystem operates for at least 15 minutes.

*When recently irradiated fuel is being handled in the secondary containment and during operations with a potential for draining the reactor vessel.

LIMITING CONDITION FOR OPERATION (Continued)

ACTION: (Continued)

b. In OPERATIONAL CONDITION 4 or 5:

With only one station service water pump and its associated flowpath OPERABLE, restore at least two pumps with at least one flow path to OPERABLE status within 72 hours or declare the associated SACS subsystem inoperable and take the ACTION required by Specification 3.7.1.1.

c. In OPERATIONAL CONDITION *:

With only one station service water pump and its associated flowpath OPERABLE, restore at least two pumps with at least one flow path to OPERABLE status within 72 hours or declare the associated SACS subsystem inoperable and take the ACTION required by Specification 3.7.1.1. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.7.1.2 At least the above required station service water system loops shall be demonstrated OPERABLE:

a. At least once per 31 days by verifying that each valve (manual, power operated or automatic), servicing safety related equipment that is not locked, sealed or otherwise secured in position, is in its correct position.

b. At least once per 18 months during shutdown, by verifying that:

1. Each automatic valve servicing non-safety related equipment actuates to its isolation position on an isolation test signal.

2. Each pump starts automatically when its associated diesel generator automatically starts.

* When handling irradiated fuel in the secondary containment.

recently

ELECTRICAL POWER SYSTEMS

A.C. SOURCES - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.1.2 As a minimum, the following A.C. electrical power sources shall be OPERABLE:

a. One circuit between the offsite transmission network and the onsite Class 1E distribution system, and

b. Two diesel generators, one of which shall be diesel generator A or diesel generator B, each with:

1. A separate fuel oil day tank containing a minimum of 360 gallons of fuel.

2. A fuel storage system consisting of two storage tanks containing a minimum of 44,800 gallons of fuel.

3. A separate fuel transfer pump for each storage tank.

APPLICABILITY: OPERATIONAL CONDITIONS 4, 5 and *.

ACTION:

a. With less than the above required A.C. electrical power sources OPERABLE, suspend CORE ALTERATIONS handling of recently irradiated fuel in the secondary containment, operations with a potential for draining the reactor vessel and crane operations over the spent fuel storage pool when fuel assemblies are stored therein. In addition, when in OPERATIONAL CONDITION 5 with the water level less than 22'-2" above the reactor pressure vessel flange, immediately initiate corrective action to restore the required power sources to OPERABLE status as soon as practical.

b. The provisions of Specification 3.0.3 are not applicable.

c. With one fuel oil transfer pump inoperable, realign the flowpath of the affected tank to the tank with the remaining operable fuel oil transfer pump within 48 hours and restore the inoperable transfer pump to OPERABLE status within 14 days, otherwise declare the affected emergency diesel generator (EDG) inoperable. This variance may be applied to only one EDG at a time.

SURVEILLANCE REQUIREMENTS

4.8.1.2 At least the above required A.C. electrical power sources shall be demonstrated OPERABLE per Surveillance Requirements 4.8.1.1.1, 4.8.1.1.2, and 4.8.1.1.3, except for the requirement of 4.8.1.1.2.a.5.

* When handling recently irradiated fuel in the secondary containment.

ELECTRICAL POWER SYSTEMS

D.C. SOURCES - SHUTDOWN

LIMITING CONDITION FOR OPERATION

3.8.2.2 As a minimum, two of the following four channels of the D.C. electrical power sources, one of which shall be channel A or channel B, shall be OPERABLE with:

a. Channel A, consisting of:
   1. 125 volt battery 1AD411
   2. 125 volt full capacity charger# 1AD413 or 1AD414

b. Channel B, consisting of:
   1. 125 volt battery 1BD411
   2. 125 volt full capacity charger# 1BD413 or 1BD414.

c. Channel C, consisting of:
   1. 125 volt battery 1CD411
   2. 125 volt full capacity charger# 1CD413 or 1CD414
   3. 125 volt battery 1CD447
   4. 125 volt full capacity charger 1CD444

d. Channel D, consisting of:
   1. 125 volt battery 1DD411
   2. 125 volt full capacity charger# 1DD413 or 1DD414
   3. 125 volt battery 1DD447
   4. 125 volt full capacity charger 1DD444

APPLICABILITY: OPERATIONAL CONDITIONS 4, 5 and *.

ACTION:

a. With less than two channels of the above required D.C. electrical power sources OPERABLE, suspend CORE ALTERATIONS, handling of recently irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel.

b The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.8.2.2 At least the above required battery and charger shall be demonstrated OPERABLE per Surveillance Requirement 4.8.2.1.

*When handling recently irradiated fuel in the secondary containment.
#Only one full capacity charger per battery is required for the channel to be OPERABLE.

LIMITING CONDITION FOR OPERATION (Continued)

APPLICABILITY: OPERATIONAL CONDITIONS 4, 5 and *.

ACTION:

a. With less than two channels of the above required A.C. distribution system energized, suspend CORE ALTERATIONS, handling of recently irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel.

b. With less than two channels of the above required D.C. distribution system energized, suspend CORE ALTERATIONS, handling of recently irradiated fuel in the secondary containment and operations with a potential for draining the reactor vessel.

c. The provisions of Specification 3.0.3 are not applicable.

SURVEILLANCE REQUIREMENTS

4.8.3.2 At least the above required power distribution system channels shall be determined energized at least once per 7 days by verifying correct breaker/switch alignment and voltage on the busses/MCCs/panels.

*When handling recently irradiated fuel in the secondary containment.