ATTACHMENT 1

VOLUME 13

SAN ONOFRE NUCLEAR GENERATING STATION

IMPROVED TECHNICAL SPECIFICATIONS CONVERSION

ITS CHAPTER 4.0 DESIGN FEATURES

LIST OF ATTACHMENTS

1. **ITS 4.0**

ATTACHMENT 1

ITS 4.0, DESIGN FEATURES

Current Technical Specification (CTS) Markup and Discussion of Changes (DOCs)

ITS

A01

4.0 4.0 DESIGN FEATURES

4.1 4.1 Site

4.1.1 4.1.1 Exclusion Area Boundary

The exclusion area boundary shall be as shown in Figure 4.1-1.

4.1.2 4.1.2 Low Population Zone (LPZ)

The LPZ shall be as shown in Figure 4.1-2.

4.2 4.2 Reactor Core

4.2.1 4.2.1 Fuel Assemblies

A02

The reactor shall contain 217 fuel assemblies. Each assembly shall consist of a matrix of Zircaloy or ZIRLO™ ~~clad~~ fuel rods with an initial composition of natural or slightly enriched uranium dioxide (UO_2) as fuel material. Integral or Discrete Burnable Absorber Rods may be used. They may include: borosilicate glass = Na_2O-B_2O_3-SiO_2 components, boron carbide = B_4C, zirconium boride = ZrB_2, gadolinium oxide = Gd_2O_3, erbium oxide = Er_2O_3. Limited substitutions of zirconium alloy ~~(such as ZIRLO™ or Zircaloy)~~ or stainless steel filler rods for fuel rods, in accordance with approved applications of fuel rod configurations, may be used. Fuel assemblies shall be limited to those fuel designs that have been analyzed with applicable NRC staff approved codes and methods and shown by tests or analyses to comply with all fuel safety design bases. A limited number of lead test assemblies that have not completed representative testing may be placed in nonlimiting core regions.

4.2.2 4.2.2 Control Element Assemblies

The reactor core shall contain 83 full length and eight part length control element assemblies (CEAs). The control material shall be silver indium cadmium, boron carbide, ~~and~~ inconel as approved by the NRC.

(continued)

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A01 A04

4.0 DESIGN FEATURES (continued)

Figure
4.1-1

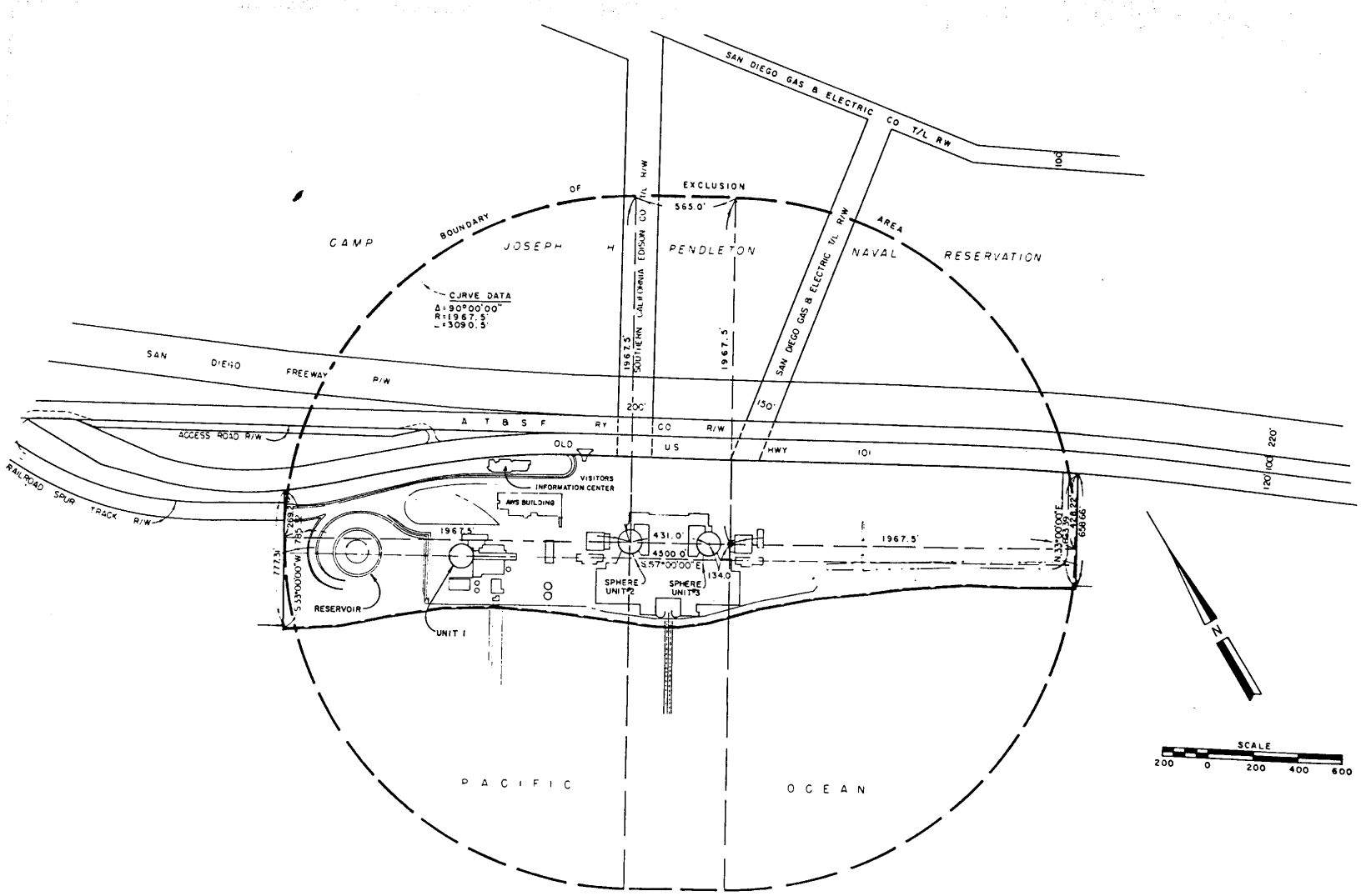

Figure 4.1-1 (page 1 of 1)
Exclusion Area Boundary

(continued)

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ITS

A01 A04

4.0 DESIGN FEATURES (continued)

Figure
4.1-2

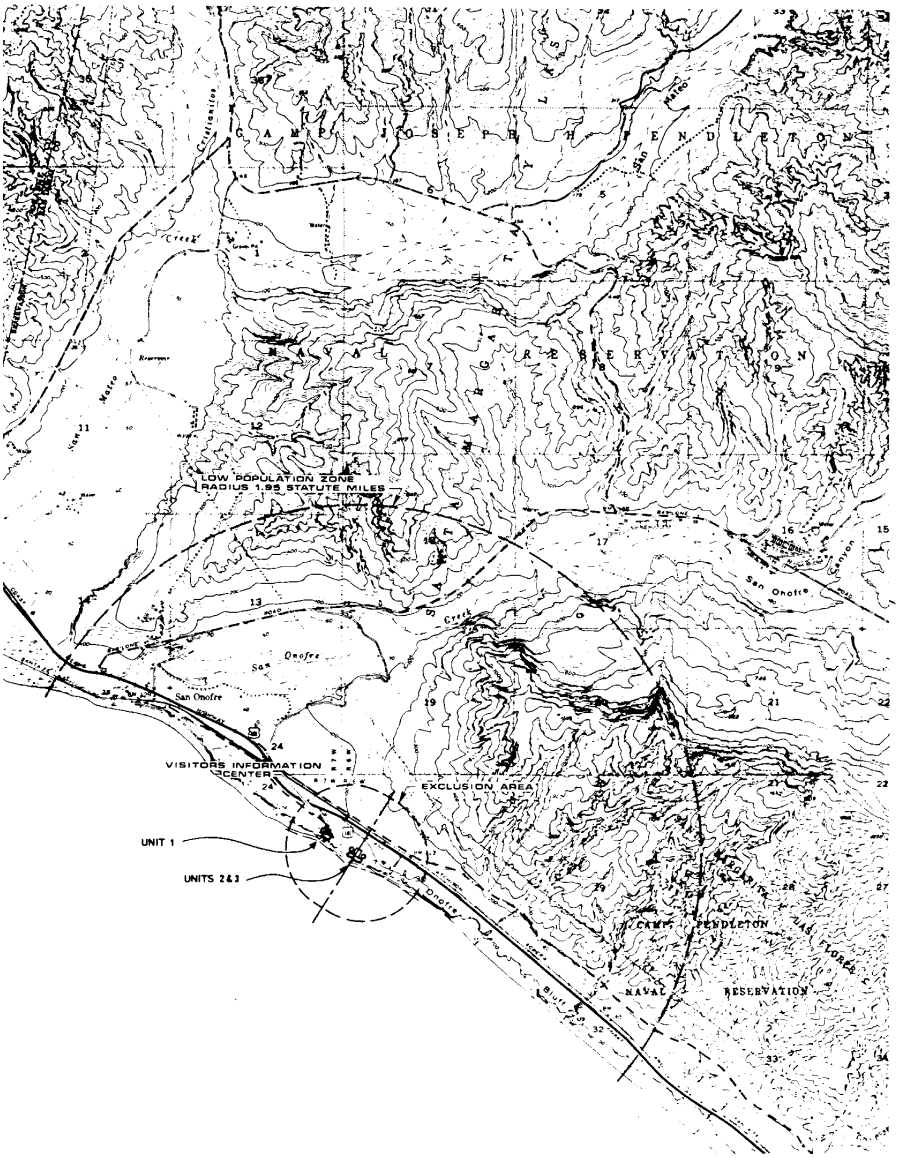

Figure 4.1-2 (page 1 of 1)
Low Population Zone

(continued)

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4.0 DESIGN FEATURES (continued)

4.3 4.3 Fuel Storage

4.3.1 4.3.1 Criticality

4.3.1.1 4.3.1.1 The spent fuel storage racks are designed and shall be maintained with:

4.3.1.1.a a. Fuel assemblies having a maximum U-235 enrichment of 4.8 weight percent;

4.3.1.1.b b. K_{eff} < 1.0 if fully flooded with unborated water, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR;

4.3.1.1.c c. K_{eff} ≤ 0.95 if fully flooded with water borated to 1700 ppm, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR;

4.3.1.1.d d. Three or five Borated stainless steel guide tube inserts (GT-Insert) may be used. When three Borated stainless steel guide tube inserts are used, they will be installed in an assembly's center guide tube, the guide tube associated with the serial number, and the diagonally opposite guide tube. Fuel containing GT-Inserts may be placed in either Region I or Region II. However, credit for GT-Inserts is only taken for Region II storage.

A five-finger CEA may be installed in an assembly. Fuel containing a five-finger CEA may be placed in either Region I or Region II. Credit for inserted 5-finger CEAs is taken for both Region I and Region II.

4.3.1.1.e e. A nominal 8.85 inch center to center distance between fuel assemblies placed in Region II;

4.3.1.1.f f. A nominal 10.40 inch center to center distance between fuel assemblies placed in Region I;

(continued)

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4.0 DESIGN FEATURES (continued)

4.3.1 4.3.1 Criticality (continued)

, "Spent Fuel Pool Storage,"

4.3.1.1.g g. Prior to using the storage criteria of LCO 3.7.18 and LCS 4.0.100, the following uncertainties will be applied:

(1) The calculated discharge burnup of San Onofre Units 2 and 3 assemblies will be reduced by 6.6%.

(2) The calculated discharge burnup of San Onofre Unit 1 fuel assemblies will be reduced by 10.0%.

4.3.1.1.h h. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-1 are allowed unrestricted storage in Region I;

4.3.1.1.i i. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-2 are allowed unrestricted storage in the peripheral pool locations with 1 or 2 faces toward the spent fuel pool walls of Region I;

4.3.1.1.j j. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-3 are allowed unrestricted storage in Region II;

4.3.1.1.k k. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-4 are allowed unrestricted storage in the peripheral pool locations with 1 or 2 faces toward the spent fuel pool walls of Region II;

4.3.1.1.l l. Units 2 and 3 fuel assemblies with a burnup in the "unacceptable range" of Figure 3.7.18-1, Figure 3.7.18-2, Figure 3.7.18-3, and Figure 3.7.18-4 will be stored in compliance with Licensee Controlled Specification 4.0.100 Rev. 2, dated 09/27/07; and

4.3.1.1.m m. Each SONGS 1 uranium dioxide spent fuel assembly stored in Region II shall be stored in accordance with Licensee Controlled Specification 4.0.100 Rev. 2, dated 09/27/07.

(continued)

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ITS

A01

4.0 DESIGN FEATURES (continued)

4.3 4.3 Fuel Storage (continued)

4.3.1.2 4.3.1.2 The new fuel storage racks are designed and shall be maintained with:

4.3.1.2.a a. Fuel assemblies having a maximum U-235 enrichment of 4.8 weight percent;

4.3.1.2.b b. K_{eff} ≤ 0.95 if fully flooded with unborated water, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR;

4.3.1.2.c c. K_{eff} ≤ 0.98 if moderated by aqueous foam, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR; and

4.3.1.2.d d. A minimum 29 inch center to center distance between fuel assemblies placed in the storage racks.

4.3.2 4.3.2 Drainage

The spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool below ~~Technical Specification 3.7.16 value (23 feet above the top of irradiated fuel assemblies seated in the storage racks)~~.

plant elevation 56 ft 0 inches

A03

4.3.3 4.3.3 Capacity

The spent fuel storage pool is designed and shall be maintained with a storage capacity limited to no more than 1542 fuel assemblies.

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ITS

A01

4.0 4.0 DESIGN FEATURES

4.1 4.1 Site

4.1.1 4.1.1 Exclusion Area Boundary

The exclusion area boundary shall be as shown in Figure 4.1-1.

4.1.2 4.1.2 Low Population Zone (LPZ)

The LPZ shall be as shown in Figure 4.1-2.

4.2 4.2 Reactor Core

4.2.1 4.2.1 Fuel Assemblies

A02

The reactor shall contain 217 fuel assemblies. Each assembly shall consist of a matrix of Zircaloy or ZIRLO™ ~~clad~~ fuel rods with an initial composition of natural or slightly enriched uranium dioxide (UO_2) as fuel material. Integral or Discrete Burnable Absorber Rods may be used. They may include: borosilicate glass – Na_2O-B_2O_3-SiO_2 components, boron carbide – B_4C, zirconium boride – ZrB_2, gadolinium oxide – Gd_2O_3, erbium oxide – Er_2O_3. Limited substitutions of zirconium alloy ~~(such as ZIRLO™ or Zircaloy)~~ or stainless steel filler rods for fuel rods, in accordance with approved applications of fuel rod configurations, may be used. Fuel assemblies shall be limited to those fuel designs that have been analyzed with applicable NRC staff approved codes and methods and shown by tests or analyses to comply with all fuel safety design bases. A limited number of lead test assemblies that have not completed representative testing may be placed in nonlimiting core regions.

4.2.2 4.2.2 Control Element Assemblies

The reactor core shall contain 83 full length and eight part length control element assemblies (CEAs). The control material shall be silver indium cadmium, boron carbide, ~~and~~ inconel as approved by the NRC.

(continued)

ITS

A01 A04

4.0 DESIGN FEATURES (continued)

Figure
4.1-1

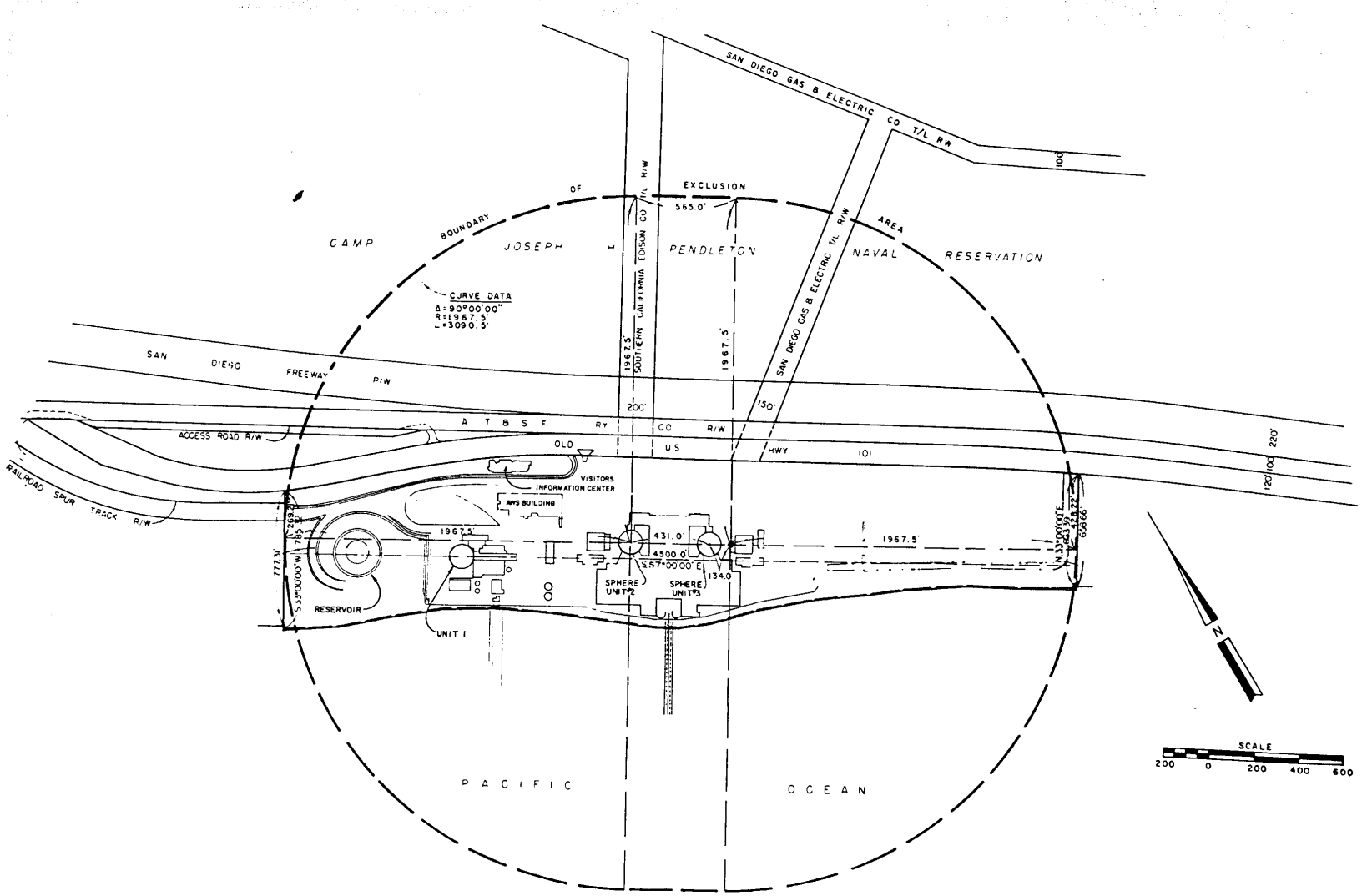

Figure 4.1-1 (page 1 of 1)
Exclusion Area Boundary

(continued)

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ITS

A01 A04

4.0 DESIGN FEATURES (continued)

Figure
4.1-2

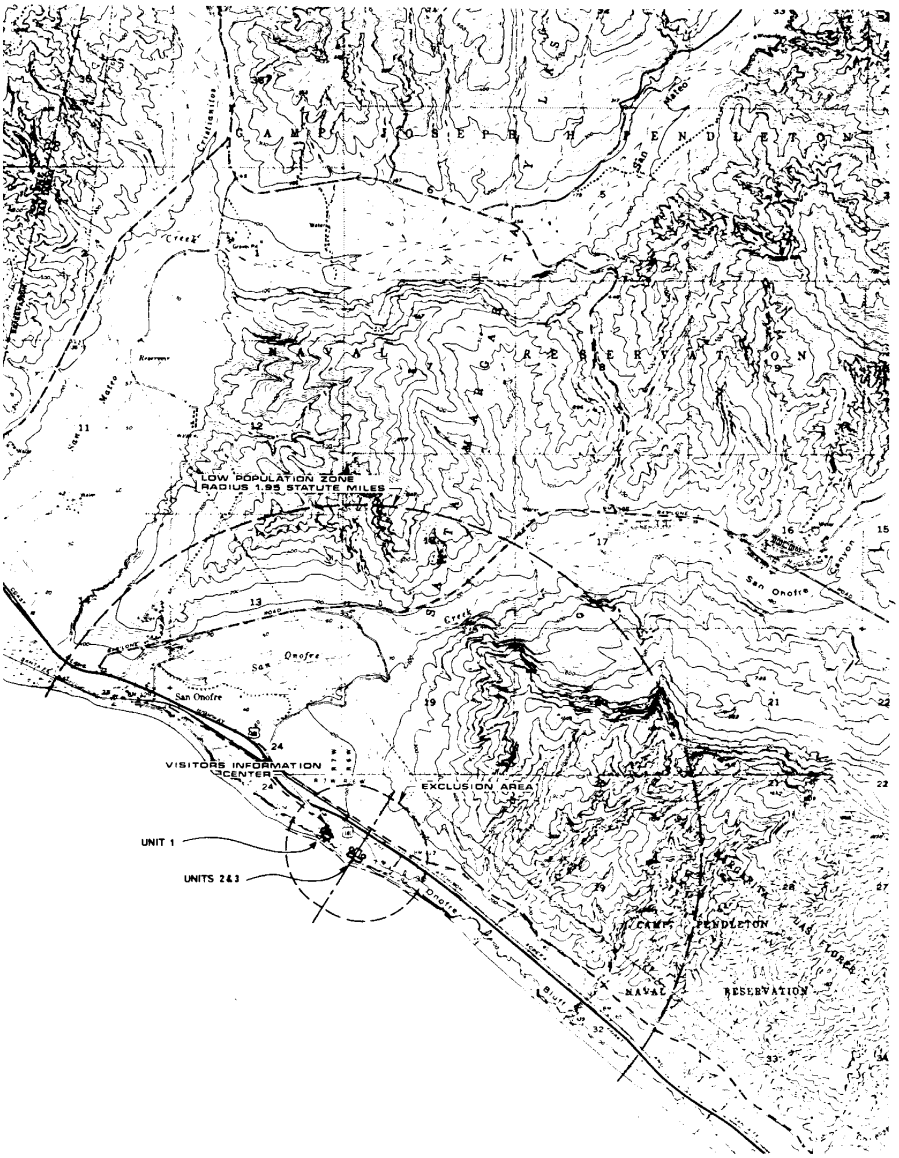

Figure 4.1-2 (page 1 of 1)
Low Population Zone

(continued)

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A01

4.0 DESIGN FEATURES (continued)

4.3 4.3 Fuel Storage

4.3.1 4.3.1 Criticality

4.3.1.1 4.3.1.1 The spent fuel storage racks are designed and shall be maintained with:

4.3.1.1.a a. Fuel assemblies having a maximum U-235 enrichment of 4.8 weight percent;

4.3.1.1.b b. K_{eff} < 1.0 if fully flooded with unborated water, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR;

4.3.1.1.c c. K_{eff} ≤ 0.95 if fully flooded with water borated to 1700 ppm, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR;

4.3.1.1.d d. Three or five Borated stainless steel guide tube inserts (GT-Insert) may be used. When three Borated stainless steel guide tube inserts are used, they will be installed in an assembly's center guide tube, the guide tube associated with the serial number, and the diagonally opposite guide tube. Fuel containing GT-Inserts may be placed in either Region I or Region II. However, credit for GT-Inserts is only taken for Region II storage.

A five-finger CEA may be installed in an assembly. Fuel containing a five-finger CEA may be placed in either Region I or Region II. Credit for inserted 5-finger CEAs is taken for both Region I and Region II.

4.3.1.1.e e. A nominal 8.85 inch center to center distance between fuel assemblies placed in Region II;

4.3.1.1.f f. A nominal 10.40 inch center to center distance between fuel assemblies placed in Region I;

(continued)

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4.0 DESIGN FEATURES (continued)

4.3.1 4.3.1 Criticality (continued)

, "Spent Fuel Pool Storage,"

4.3.1.1.g g. Prior to using the storage criteria of LCO 3.7.18 and LCS 4.0.100, the following uncertainties will be applied:

(1) The calculated discharge burnup of San Onofre Units 2 and 3 assemblies will be reduced by 6.6%.

(2) The calculated discharge burnup of San Onofre Unit 1 fuel assemblies will be reduced by 10.0%.

4.3.1.1.h h. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-1 are allowed unrestricted storage in Region I;

4.3.1.1.i i. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-2 are allowed unrestricted storage in the peripheral pool locations with 1 or 2 faces toward the spent fuel pool walls of Region I;

4.3.1.1.j j. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-3 are allowed unrestricted storage in Region II;

4.3.1.1.k k. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-4 are allowed unrestricted storage in the peripheral pool locations with 1 or 2 faces toward the spent fuel pool walls of Region II;

4.3.1.1.l l. Units 2 and 3 fuel assemblies with a burnup in the "unacceptable range" of Figure 3.7.18-1, Figure 3.7.18-2, Figure 3.7.18-3, and Figure 3.7.18-4 will be stored in compliance with Licensee Controlled Specification 4.0.100 Rev. 2, dated 09/27/07; and

4.3.1.1.m m. Each SONGS 1 uranium dioxide spent fuel assembly stored in Region II shall be stored in accordance with Licensee Controlled Specification 4.0.100 Rev. 2, dated 09/27/07.

(continued)

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ITS

A01

4.0 DESIGN FEATURES (continued)

4.3 4.3 Fuel Storage (continued)

4.3.1.2 4.3.1.2 The new fuel storage racks are designed and shall be maintained with:

4.3.1.2.a a. Fuel assemblies having a maximum U-235 enrichment of 4.8 weight percent;

4.3.1.2.b b. K_{eff} ≤ 0.95 if fully flooded with unborated water, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR;

4.3.1.2.c c. K_{eff} ≤ 0.98 if moderated by aqueous foam, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR; and

4.3.1.2.d d. A minimum 29 inch center to center distance between fuel assemblies placed in the storage racks.

4.3.2 4.3.2 Drainage

The spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool below ~~Technical Specification 3.7.16 value (23 feet above the top of irradiated fuel assemblies seated in the storage racks)~~.

plant elevation 56 ft 0 inches

A03

4.3.3 4.3.3 Capacity

The spent fuel storage pool is designed and shall be maintained with a storage capacity limited to no more than 1542 fuel assemblies.

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DISCUSSION OF CHANGES
ITS 4.0, DESIGN FEATURES

ADMINISTRATIVE CHANGES

A01 In the conversion of the San Onofre Nuclear Generating Station (SONGS) Current Technical Specifications (CTS) to the plant specific Improved Technical Specifications (ITS), certain changes (wording preferences, editorial changes, reformatting, revised numbering, etc.) are made to obtain consistency with NUREG-1432, Rev. 3.0, "Standard Technical Specifications Combustion Engineering Plants" (ISTS) and additional approved Technical Specification Task Force (TSTF) travelers included in this submittal.

These changes are designated as administrative changes and are acceptable because they do not result in technical changes to the CTS.

A02 CTS 4.2.1 states, in part, each assembly shall consist of a matrix of Zircaloy or Zirlo "clad" fuel rods with an initial composition… ITS 4.2.1 does not contain the word "clad" in the statement. This changes the CTS by deleting the word "clad" when discussing the makeup of the fuel rods.

The purpose of CTS 4.2.1 is to discuss the Fuel Assemblies. The proposed change deletes the word "clad" from the statement, "…Zircaloy or Zirlo clad fuel rods…" This change is acceptable because the fuel assemblies are made of Zircaloy or Zirlo and the word clad is not required. This change clarifies the makeup of the fuel assemblies. This change is classified as administrative because it only clarifies and does not technically change the Technical Specifications.

A03 CTS 4.3.2 states the spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool level below "Technical Specification 3.7.16 value (23 feet above the top of irradiated fuel assemblies seated in the storage racks)." ITS 4.3.2 will replace the words "Technical Specification 3.7.16 value (23 feet above the top of irradiated fuel assemblies seated in the storage racks)" with "elevation 56 ft 0 inches." This changes the CTS by discussing the level, below which drainage of the spent fuel pool is prevented, in plant elevation versus feet above the irradiated fuel.

The purpose of the CTS 4.3.3 is to discuss the drainage of the spent fuel storage pool. The proposed change discusses the lowest level of spent fuel storage pool drainage in plant elevation. This change is acceptable because it only changes the presentation of information. Elevation 56 ft 0 inches is equivalent to 23 feet above the top if irradiated fuel assemblies seated in the storage racks. The change does not technically alter the Technical Specifications because the lowest level, below which drainage is prevented, is not being altered. This change is designated as administrative because it does not technically alter the Technical Specifications.

A04 CTS Figure 4.1-1 shows the Exclusion Area Boundary, and includes a Reservoir, the Unit 1 containment structure, and a Visitors Information Center within the Exclusion Area Boundary. ITS Figure 4.1-1 also shows the Exclusion Area Boundary, but the drawing provided in the ITS has been modified such that the Reservoir is replaced with a Parking Lot, the Unit 1 containment structure is replaced with the ISFSI structure, and the Visitors Information Center is removed.

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DISCUSSION OF CHANGES
ITS 4.0, DESIGN FEATURES

CTS Figure 4.1-2 shows the Low Population Zone, and includes the Unit 1 containment structure. ITS Figure 4.1-2 also shows the Low Population Zone, but the drawing provided in the ITS has been modified such that the Unit 1 containment structure is replaced with the ISFSI structure. This changes the CTS by updating the interior layout of certain features of the Exclusion Area Boundary and Low Population Zone.

The purpose of providing the Exclusion Area Boundary in the Technical Specifications is to identify the locations of the possible radioactive release points and to show the dimensions of the boundary and the purpose of the Low Population Zone is to show the dimensions of the zone with respect to the plant. The ITS drawings have been updated to be consistent with the current Exclusion Area Boundary and Low Population Zone drawings in the UFSAR. The proposed changes do not affect the release points, nor the dimensions of the Exclusion Area Boundary or the Low Population Zone, associated with the SONGS Units 2 and 3 operating license. Therefore, since the ITS Figures are consistent with the figures in the UFSAR, this change is acceptable and is designated as administrative.

MORE RESTRICTIVE CHANGES

None

RELOCATED SPECIFICATIONS

None

REMOVED DETAIL CHANGES

None

LESS RESTRICTIVE CHANGES

None

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Improved Standard Technical Specifications (ISTS) Markup and Justification for Deviations (JFDs)

4.0 4.0 DESIGN FEATURES

4.1 4.1 Site Location

[Text description of site location.] INSERT 1 2

4.2 4.2 Reactor Core

4.2.1 4.2.1 Fuel Assemblies

The reactor shall contain [217] fuel assemblies. Each assembly shall consist of a matrix of [Zircalloy or ZIRLO] fuel rods with an initial composition of natural or slightly enriched uranium dioxide (UO_2) as fuel material. Limited substitutions of zirconium alloy or stainless steel filler rods for fuel rods, in accordance with INSERT 2 approved applications of fuel rod configurations, may be used. Fuel assemblies shall be limited to those fuel designs that have been analyzed with applicable NRC staff approved codes and methods and shown by tests or analyses to comply with all fuel safety design bases. A limited number of lead test assemblies that have not completed representative testing may be placed in nonlimiting core regions. 2 1

Element

4.2.2 4.2.2 [Control Rod] Assemblies

83 full length and eight part length inconel

The reactor core shall contain [91] control element assemblies (CEAs). The control material shall be [silver indium cadmium, boron carbide, or hafnium metal] as approved by the NRC. 2

4.3 4.3 Fuel Storage

4.3.1 4.3.1 Criticality

4.3.1.1 4.3.1.1 The spent fuel storage racks are designed and shall be maintained with:

4.3.1.1.a a. Fuel assemblies having a maximum U-235 enrichment of 4.8 [4.5] weight percent, 2

4.3.1.1.b < 1.0 b. k_{eff} ≤ 0.95 if fully flooded with unborated water, which includes an allowance for uncertainties as described in [Section 9.1 of the U FSAR], 1 2

INSERT 3 1

4.3.1.1.e 8.85 [c. e. A nominal [9] inch center to center distance between fuel assemblies placed in [the high density fuel storage racks],] Region II 2

4.3.1.1.f 10.40 [d. f. A nominal [10.4] inch center to center distance between fuel assemblies placed in [the low density fuel storage racks],] Region I

2 **INSERT 1**

4.1.1 4.1.1 Exclusion Area Boundary

The exclusion area boundary shall be as shown in Figure 4.1-1.

4.1.2 4.1.2 Low Population Zone (LPZ)

The LPZ shall be as shown in Figure 4.1-2.

1 **INSERT 2**

4.2.1 Integral or Discrete Burnable Absorber Rods may be used. They may include: borosilicate glass (Na_2O-B_2O_3-SiO_2) components, boron carbide (B_4C), zirconium boride (ZrB_2), gadolinium oxide (Gd_2O_3), or erbium oxide (Er_2O_3).

1 **INSERT 3**

4.3.1.1.c c. $k_{eff} \leq 0.95$ if fully flooded with water borated to 1700 ppm, which includes an allowance for uncertainties as described in Section 9.1 of the UFSAR;

4.3.1.1.d d. Three or five borated stainless steel guide tube inserts (GT-Insert) may be used. When three borated stainless steel guide tube inserts are used, they will be installed in an assembly's center guide tube, the guide tube associated with the serial number, and the diagonally opposite guide tube. Fuel containing GT-Inserts may be placed in Region I or Region II. However, credit for GT-Inserts is only taken for Region II storage.

A five-finger CEA may be installed in an assembly. Fuel containing a five-finger CEA may be placed in either Region I or Region II. Credit for inserted 5-finger CEAs is taken for both Region I and Region II.

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4.0 DESIGN FEATURES

4.3

4.3 Fuel Storage (continued)

INSERT 4

[e. New or partially spent fuel assemblies with a discharge burnup in the "acceptable range" of Figure [3.7.18-1] may be allowed unrestricted storage in [either] fuel storage rack(s), and]

[f. New or partially spent fuel assemblies with a discharge burnup in the "unacceptable range" of Figure [3.7.18-1] will be stored in compliance with the NRC approved [specific document containing the analytical methods, title, date, or specific configuration or figure].]

2

4.3.1.2 4.3.1.2 The new fuel storage racks are designed and shall be maintained with:

4.3.1.2.a a. Fuel assemblies having a maximum U-235 enrichment of 4.8 → [4.5] weight percent,

2

0.95 →

4.3.1.2.b b. $k_{eff} \leq$ 0.98 if fully flooded with unborated water, which includes an allowance for uncertainties as described in [Section 9.1 of the U → FSAR],

1

4.3.1.2.c c. $k_{eff} \leq 0.98$ if moderated by aqueous foam, which includes an allowance for uncertainties as described in [Section 9.1 of the U → FSAR], and

2

minimum 29 →

4.3.1.2.d d. A nominal [10] inch center to center distance between fuel assemblies placed in the storage racks.

1 2

4.3.2 4.3.2 Drainage

The spent fuel storage pool is designed and shall be maintained to prevent inadvertent draining of the pool below elevation [23 ft].

3 2

plant → 56 ft 0 inches →

4.3.3 4.3.3 Capacity

The spent fuel storage pool is designed and shall be maintained with a storage capacity limited to no more than [1542] fuel assemblies.

INSERTS 5 and 6 →

1

(2) **INSERT 4**

4.3.1.1.g g. Prior to using the storage criteria of LCO 3.7.18, "Spent Fuel Pool Storage," and LCS 4.0.100, the following uncertainties will be applied:

(1) The calculated discharge burnup of San Onofre Units 2 and 3 assemblies will be reduced by 6.6%.

(2) The calculated discharge burnup of San Onofre Unit 1 fuel assemblies will be reduced by 10.0%.

4.3.1.1.h h. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-1 are allowed unrestricted storage in Region I;

4.3.1.1.i i. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-2 are allowed unrestricted storage in the peripheral pool locations with 1 or 2 faces toward the spent fuel pool walls of Region I;

4.3.1.1.j j. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-3 are allowed unrestricted storage in Region II;

4.3.1.1.k k. Units 2 and 3 fuel assemblies with a burnup in the "acceptable range" of Figure 3.7.18-4 are allowed unrestricted storage in the peripheral pool locations with 1 or 2 faces toward the spent fuel pool walls of Region II;

4.3.1.1.l l. Units 2 and 3 fuel assemblies with a burnup in the "unacceptable range" of Figure 3.7.18-1, Figure 3.7.18-2, Figure 3.7.18-3, and Figure 3.7.18-4 will be stored in compliance with Licensee Controlled Specification 4.0.100 Rev. 2, dated 9/27/07; and

4.3.1.1.m m. Each SONGS 1 uranium dioxide spent fuel assembly stored in Region 2 shall be stored in accordance with Licensee Controlled Specification 4.0.100 Rev. 2, dated 9/27/07.

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1 **INSERT 5**

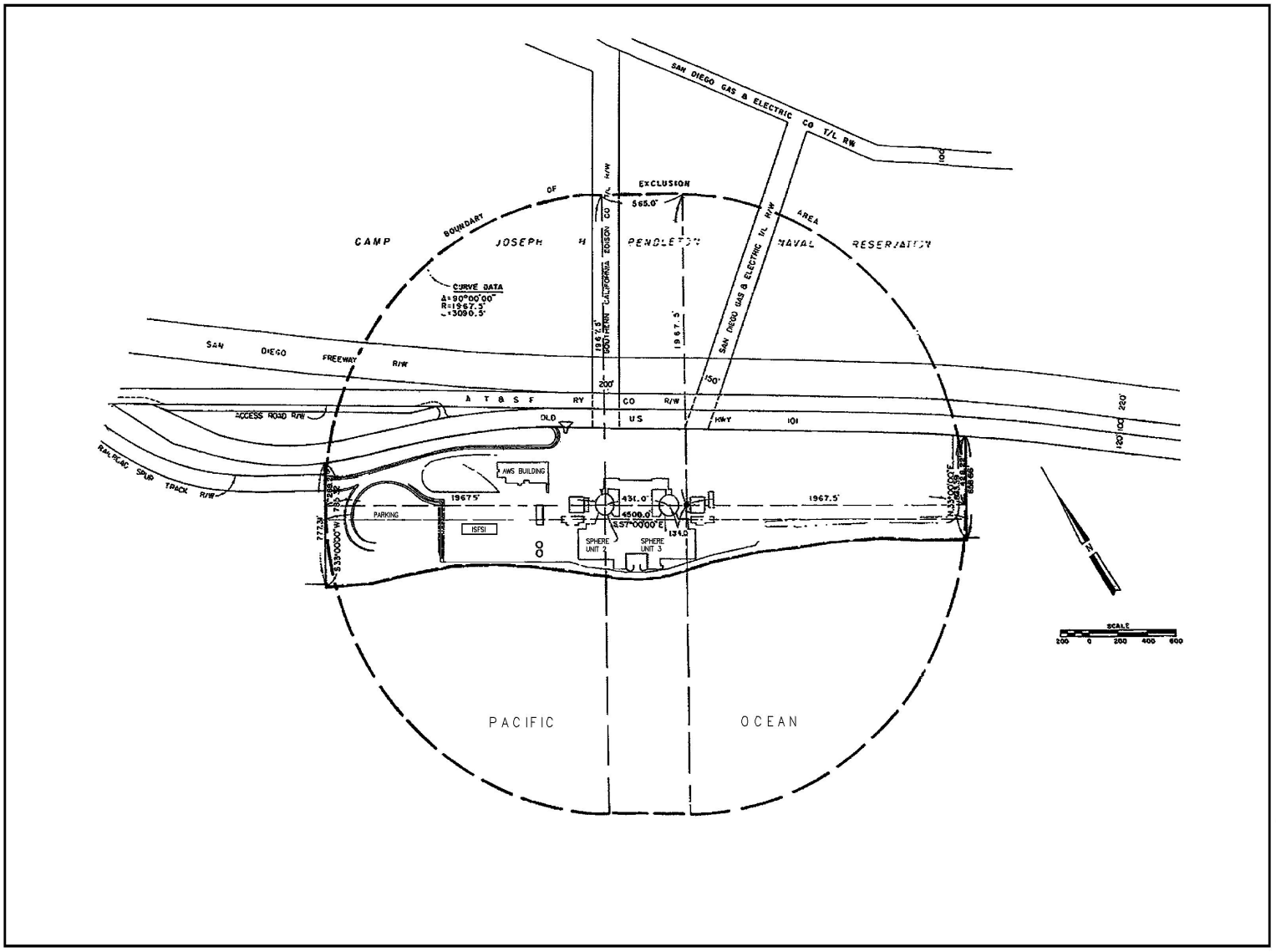

Figure 4.1-1
Exclusion Area Boundary

Insert Page 4.0-2b

1 **INSERT 6**

Figure 4.1-2

Low Population Zone (LPZ)

Insert Page 4.0-2c

JUSTIFICATION FOR DEVIATIONS
ITS 4.0, DESIGN FEATURES

1. Changes are made (additions, deletions, and/or changes) to the ISTS which reflect the plant specific nomenclature, number, reference, system description, analysis, or licensing basis description.

2. The ISTS contains bracketed information and/or values that are generic to all Combustion Engineering vintage plants. The brackets are removed and the proper plant specific information/value is provided. This is acceptable since the information/value is changed to reflect the current licensing basis.

3. For clarification, ISTS 4.3.2 was revised by adding "plant" to "elevation" to make "plant elevation."

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Specific No Significant Hazards Considerations (NSHCs)

DETERMINATION OF NO SIGNIFICANT HAZARDS CONSIDERATIONS
ITS 4.0, DESIGN FEATURES

There are no specific No Significant Hazards Considerations for this Specification.

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