UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SPLIT REPORT

MAY 9 1988

Mr. Walter S. Wilgus, Chairman
The B&W Owners Group
Suite 525
1700 Rockville Pike
Rockville, Maryland 20852

Dear Mr. Wilgus:

This letter is in response to your report identifying which Standard Technical Specification (STS) requirements you believe should be retained in the new STS and which can be relocated to other licensee-controlled documents.

The enclosure to this letter documents the NRC staff's conclusions as to which current STS requirements must be retained in the new STS. These conclusions are based on the Commission's Interim Policy Statement on Technical Specification Improvements and on several interpretations of how to apply the screening criteria contained in that Policy Statement. The NRC staff considered comments made by industry at a March 29, 1988 meeting between NRC, NUMARC, and each Owners Group in making these interpretations.

Based on our review, we have concluded that a significant reduction can be made in the number of Limiting Conditions for Operation (and associated Surveillance Requirements) that must be included in the STS. Our goal is to assure that the new STS contain only requirements that are consistent with 10 CFR 50.36 and have a sound safety basis.

The development of the new STS based on the staff's conclusions will result in more efficient use of NRC and industry resources. Safety improvements are expected through more operator-oriented Technical Specifications, improved Technical Specification Bases, a reduction in action statement-induced plant transients, and a reduction in testing at power.

As you are aware, the NRC staff and industry also have underway a parallel program of specific line item improvements to both the scope and substance of the existing Technical Specifications. The need for many of these types of improvements was identified in the report (NUREG-1024) of a major staff task group established in 1983 to study surveillance requirements in Technical Specifications and develop alternative approaches to provide better assurance that surveillance testing does not adversely impact safety. The NRC will continue to actively identify and pursue the development of specific line item improvements to Technical Specifications and will make these improvements immediately available to licensees without waiting for the new STS. We encourage each of the Owners Groups to continue to work with the NRC staff on these types of parallel improvements to existing Technical Specifications.

We are confident that the enclosed staff report provides an adequate basis for the Owners Groups to proceed with the development of complete new STS in accordance with the Commission's Interim Policy Statement.

We will continue to interact with the NUMARC Technical Specification Working Group and each of the individual vendor Owners Groups as needed to keep this important program moving forward.

Sincerely,

Original signed by
Thomas E. Murley
Thomas E. Murley, Director
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc see next page

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(W.S.WILGUS/LTR/SPLIT REPORT)

CONCURRENCE:

*(see previous concurrence)

*TSB:DOEA:NRR	*TSB:NRR	*C:TSB:NRR	*D:DOEA:NRR	*D:DEST:NRR	*D:DEST:NRR
KDesai:pmc	DCFischer	EJButcher	CERossi	AThadani	LShao
4/18/88	04/19/88	04/20/88	04/22/88	04/26/88	04/26/88

*D:DREP:NRR	*ADT:NRR	D:NRR
JRStohr	TTMartin	TEMurley
04/28/88	05/05/88	05/6/88

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NRC STAFF REVIEW

OF

NUCLEAR STEAM SUPPLY SYSTEM VENDOR OWNERS GROUPS'

APPLICATION OF

THE COMMISSION'S INTERIM POLICY STATEMENT CRITERIA

TO

STANDARD TECHNICAL SPECIFICATIONS

1. INTRODUCTION

On February 6, 1987, the Commission issued its Interim Policy Statement on Technical Specification Improvements (52 FR 3788). The Policy Statement encourages the industry to develop new Standard Technical Specifications (STS) to be used as guides for licensees in preparing improved Technical Specifications (TS) for their facilities. The Interim Policy Statement contains criteria (including a discussion of each) for determining which regulatory requirements and operating restrictions should be retained in the new STS and ultimately in plant TS. It also identifies four additional systems that are to be retained on the basis of operating experience and probabilistic risk assessments (PRA). Finally, the Policy Statement indicates that risk evaluations are an appropriate tool for defining requirements that should be retained in the STS/TS where including such requirements is consistent with the purpose of TS (as stated in the Policy Statement). Requirements that are not retained in the new STS would generally not be retained in individual plant TS. Current TS requirements not retained in the STS will be relocated to other licensee-controlled documents.

One of the first steps in the program to implement the Commission's Interim Policy Statement is to determine which Limiting Conditions for Operation (LCOs) contained in the existing STS should be retained in the new STS. An early decision on this issue will facilitate efforts to make the other improvements (described in the Policy Statement) to the text and Bases of those requirements that must be retained in the new STS.

Each Nuclear Steam Supply System (NSSS) vendor Owners Group has submitted a report to the NRC for review that identifies which STS LCOs the group believes should be retained in the new STS and which can be relocated to other licensee-controlled documents. These four NSSS vendor submittals are as follows:

(1) Letter dated October 15, 1987, R. L. Gill, B&W Owners Group, to Dr. T. E. Murley, NRC, Subject: "B&W Owners Group Technical Specification Committee Application of Selection Criteria to the B&W Standard Technical Specifications."

(2) Letter dated November 12, 1987, R. A. Newton, Westinghouse Owners Group, to NRC Document Control Desk, Subject: "Westinghouse Owners Group MERITS Program Phase II, Task 5, Criteria Application Topical Report."

(3) Letter dated December 11, 1987, J. K. Gasper, Combustion Engineering Owners Group, to Dr. T. E. Murley, NRC Subject: "CEN-355, CE Owners Group Restructured Standard Technical Specifications - Volume 1 (Criteria Application)."

(4) Letter dated November 12, 1987, R. F. Janecek, BWR Owners Group, to R. E. Starostecki, NRC, Subject: "BWR Owners Group Technical Specification screening Criteria Application and Risk Assessment."

These submittals provide the rationale for why each STS requirement (e.g. Limiting Condition for Operation) should be retained in the new STS or why it can be relocated to a licensee-controlled document. They also describe how each Owners Group used risk insights in determining the appropriate content of the new STS.

2. STAFF REVIEW

The NRC staff focused its review on those requirements identified by the Owners Groups as candidates for relocation. The staff evaluated each of these requirements to determine whether it agreed with the Owners Groups' conclusions.

During the NRC Staff's review, several issues were raised concerning the proper interpretation or application of the criteria in the Commission's Interim Policy Statement. The NRC Staff has considered these issues and concluded the following:

(1) Criterion 1 should be interpreted to include only instrumentation used to detect actual leaks and not more broadly to include instrumentation used

to detect precursors to an actual breech of the reactor coolant pressure boundary or instrumentation to identify the source of actual leakage (e.g., loose parts monitor, seismic instrumentation, valve position indicators).

(2) The "initial conditions" captured under Criterion 2 should not be limited to only "process variables" assumed in safety analyses. They should also include certain active design features (e.g., high pressure/low pressure system valves and interlocks) and operating restrictions (e.g., pressure-temperature operating limit curves), needed to preclude unanalyzed accidents. In this context, "active design features" include only design features under the control of operations personnel (i.e., licensed operators and personnel who perform control functions at the direction of licensed operators). This position is consistent with the conclusions reached by the Staff during the trial application of the criteria to the Wolf Creek and Limerick Technical Specifications.

(3) The "initial conditions" of design-basis accidents (DBA) and transients, as used in Criterion 2, should not be limited to only those directly "monitored and controlled" from the control room. Initial conditions should also include other features/characteristics that are specifically assumed in DBA and transient analyses even if they can not be directly observed in the control room. For example, initial conditions (e.g., moderator temperature coefficient and hot channel factors) that are periodically monitored by other than licensed operators (e.g., core engineers, instrumentation and control technicians) to provide licensed operators with the information required to take those actions necessary to assure that the plant is being operated within the bounds of design and analysis assumptions, meet Criterion 2 and should be retained in Technical Specifications. Initial conditions do not, however, include things that are purely design requirements.

(4) The phrase "primary success path," used in Criterion 3, should be interpreted to include only the primary equipment (including redundant trains/components) to mitigate accidents and transients. Primary success path does not include backup and diverse equipment or instrumentation used to prevent analyzed

accidents or transients or to improve reliability of the mitigation function (e.g., rod withdrawal block which is backup to the average power range monitor high flux trip in the startup mode, safety valves which are backup to low temperature over pressure relief valves during cold shutdown).

(5) Post-Accident Monitoring Instrumentation that satisfies the definition of Type A variables in Regulatory Guide 1.97, "Instrumentation for Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," meets Criterion 3 and should be retained in Technical Specifications. Type A variables provide primary information (i.e., information that is essential for the direct accomplishment of the specified manual actions (including long-term recovery actions) for which no automatic control is provided and that are required for safety systems to accomplish their safety functions for DBAs or transients). Type A variables do not include those variables associated with contingency actions that may also be identified in written procedures to compensate for failures of primary equipment. Because only Type A variables meet Criterion 3, the STS should contain a narrative statement that indicates that individual plant Technical Specifications should contain a list of Post-Accident Instrumentation that includes Type A variables. Other Post-Accident Instrumentation (i.e., non-Type A Category I) is discussed on page 6.

(6) The NRC's design basis for licensing a plant is the plant's Final Safety Analysis Report (FSAR) as qualified by the analysis performed by the staff and documented in the staff's safety evaluation report (SER). Because the staff's review and resulting SER are based on the acceptance criteria in the NRC's Standard Review Plan (NUREG-0800, SRP), the dose limits used in licensing a particular plant may be "some small fraction" of those specified in the Commission's regulations in Title 10 of the Code of Federal Regulations Part 100 (10 CFR 100). Accordingly, the SRP limits should be used to define the equipment in the primary success path for mitigating accidents and transients when developing the new STS. These types of conservatisms are required to compensate for uncertainties in analysis techniques and

provide reasonable assurance that the absolute numerical limits of the regulations will be satisfied.

On a plant-specific basis, systems and equipment that are identified in the NRC staff SER and assumed by the staff to function are considered part of the licensing basis for the plant and are captured by Criterion 3 (e.g., radiation monitoring instrumentation that initiates an isolation function, penetration room exhaust air cleanup system).

(7) DBA and transients, as used in Criteria 2 and 3, should be interpreted to include any design-basis event described in the FSAR (i.e., not just those events described in Chapters 6 and 15 of the FSAR). For example, there may be requirements for some plants which should be retained in Technical Specifications because of the risks associated with some site-specific characteristic (e.g., although not normally required, a Technical Specification on the chlorine detection system might be appropriate where a significant chlorine hazard exists in the site vicinity; similarly, a Technical Specification on flood protection might be appropriate where a plant is particularly vulnerable to flooding and is designed with special flood protection features). Criteria 2 and 3 should not be interpreted to include purely generic design requirements applicable to all plants (e.g., the requirements of General Design Criterion 19 in Appendix A to 10 CFR Part 50 for control room design).

The NRC staff has used the Commission's Interim Policy Statement and the conclusions described above to define the appropriate content of the new STS. The staff plans to factor these conclusions into the Final Policy Statement on Technical Specification Improvements that will be proposed to the Commission.

The staff reviewed the methodology and results provided by each Owners Group to verify that none of the requirements proposed for relocation contains constraints of prime importance in limiting the likelihood or severity of accident sequences that are commonly found to dominate risk. For the purpose

of this application of the guidance in the Commission Policy Statement, the staff agrees with the Owners Groups' conclusions except in two areas. First, the staff finds that the Remote Shutdown Instrumentation meets the Policy Statement criteria for inclusion in Technical Specifications based on risk; and second, the staff is unable to confirm the Owners Groups' conclusion that Category 1 Post-Accident Monitoring Instrumentation is not of prime importance in limiting risk. Recent PRAs have shown the risk significance of operator recovery actions which would require a knowledge of Category 1 variables. Furthermore, recent severe accident studies have shown significant potential for risk reduction from accident management. The Owners Groups' should develop further risk-based justification in support of relocating any or all Category 1 variables from the Standard Technical Specifications.

As stated in the Commission's Interim Policy Statement, licensees should also use plant-specific PRAs or risk surveys as they prepare license amendments to adopt the revised STS to their plant. Where PRAs or surveys are available, licensees should use them to strengthen the Bases as well as to screen those Technical Specifications to be relocated. Where such plant-specific risk surveys are not available, licensees should use the literature available on risk insights and PRAs. Licensees need not complete a plant-specific PRA before they can adopt the new STS. The NRC staff will also use risk insights and PRAs in evaluating the plant-specific submittals.

3. RESULTS OF THE STAFF'S REVIEW

Appendices A through D present the detailed results of the staff's review of the Babcock and Wilcox, Westinghouse, Combustion Engineering, and General Electric application of the selection criteria to the existing STS. Each Appendix consists of two tables. Table 1 identifies those LCOs that must be retained in the new STS. Table 2 lists those LCOs that may be wholly or partially relocated to licensee-controlled documents (or be reformatted as a surveillance requirement for another LCO). Where the staff placed specific conditions on relocation of particular LCOs the staff has so noted in the Tables. As a part of the

plant specific implementation of the new STS, the staff plans to review the location of, and controls over, relocated requirements. In as much as practicable, the Owners Groups should propose standard locations for, and controls over, relocated requirements.

For each LCO listed in Table 1, the criterion (criteria) that required that the LCO be retained in Technical Specifications is identified. If an LCO was retained in Technical Specifications solely on the basis of risk, "Risk" appears in the criteria column. Where an Owners Group determined that an LCO had to stay in Technical Specifications (because of either a particular criterion or risk) and the Staff agreed that the LCO should be retained in Technical Specifications, the staff did not, in general, verify the Owners Group's basis for retention. However, in several instances the Owners Groups cited risk considerations alone as the basis for retaining Technical Specifications and the staff disagreed with the Owners Groups. In these instances, the staff's basis for retention appears in the criteria column of Table 1.

Any LCO not specifically identified in Table 1 or Table 2 (e.g., an LCO unique to an STS not addressed in the Owners Groups submittals such as the BWR5 STS) should be retained in the STS until the Owners Group proposes and the staff makes a specific determination that it can be relocated to a licensee-controlled document.

Notwithstanding the results of this review, the staff will give further consideration for relocation of additional LCOs as the staff and industry proceed with the development of the new STS.

4. CONCLUSION

The results of the effort of the Owners Groups and of the NRC staff to apply the Policy Statement selection criteria to the existing STS are an important step toward ensuring that the new STS contain only those requirements that are consistent with 10 CFR 50.36 and have a sound safety basis. As shown in the

following tables, application of the criteria contained in the Commission's Interim Policy Statement resulted in a significant reduction in the number of LCOs to be included in the new STS. The development of the new STS based on the staff's conclusions will result in more efficient use of NRC and industry resources. Safety improvements are expected through more operator-oriented Technical Specifications, improved Technical Specification Bases, a reduction in action statement-induced plant transients, and a reduction in testing at power.

LCOs	BABCOCK & WILCOX	WESTINGHOUSE	COMBUSTION ENGINEERING	GENERAL ELECTRIC BWR4/BWR6
Total Number	137	165	159	124/144
Retained	75	92	87	81/86
Relocated	62	73	72	43/58
Percent Relocated	45%	44%	45%	35%/40%

We are confident that the staff's conclusions will provide an adequate basis for the Owners Groups to proceed with the development of complete new STS in accordance with the Commission's Interim Policy Statement.

APPENDIX A

RESULTS OF THE NRC STAFF REVIEW

BABCOCK & WILCOX OWNERS GROUP'S SUBMITTAL

RETENTION AND RELOCATION OF SPECIFIC TECHNICAL SPECIFICATIONS

APPENDIX A

TABLE 1

LCOs TO BE RETAINED IN BABCOCK & WILCOX
STANDARD TECHNICAL SPECIFICATIONS

LCO		CRITERIA
3.1	REACTIVITY CONTROL SYSTEM	
3.1.1.1	Shutdown Margin (Note 1)	2
3.1.1.2	Moderator Temperature Coefficient	2
3.1.1.3	Minimum Temperature for Criticality	2
3.1.3.1	Group Height - Safety and Regulating Rod Groups	2
3.1.3.2	Group Height - Axial Power Shaping Rod Group	2
3.1.3.6	Safety Rod Insertion Limit	2 & 3
3.1.3.7	Regulating Rod Insertion Limits	2
3.1.3.9	Xenon Reactivity	2
3.2	POWER DISTRIBUTION LIMITS	
3.2.1	Axial Power Imbalance	2
3.2.2	Nuclear Heat Flux Hot Channel Factor	2
3.2.3	Nuclear Enthalpy Rise Hot Channel Factor	2
3.2.4	Quadrant Power Tilt	2
3.2.5	DNB Parameters	2
3.3	INSTRUMENTATION	
3.3.1	Reactor Protection System Instrumentation (Note 2)	3
3.3.2	Engineered Safety Feature Actuation System Instrumentation (Note 2)	3
3.3.3.1	Radiation Monitoring Instrumentation (Notes 2 & 3)	3
3.3.3.5	Remote Shutdown Instrumentation (Notes 2 & 4)	Risk
3.3.3.6	Accident Monitoring Instrumentation	3
3.4	REACTOR COOLANT SYSTEM	
3.4.1.1	Startup and Power Operation	3
3.4.1.2	Hot Standby	3
3.4.1.3	Hot Shutdown	3
3.4.1.4	Cold Shutdown	Policy Statement (DHR)
3.4.3	Safety Valve - Operating	3
3.4.4	Pressurizer	2 & 3
3.4.5	Relief Valve	3
3.4.6	Steam Generators - Water Level	2
3.4.7.1	Leakage Detection System	1

B&W-TABLE 1 (Continued)

LCO		CRITERIA
3.4.7.2	Operational Leakage	2
3.4.9	Specific Activity	2
3.4.10.1	Reactor Coolant System Pressure/Temperature Limits	2
3.4.10.3	Overpressure Protection System	2
3.5	EMERGENCY CORE COOLING SYSTEM (ECCS)	
3.5.1	Core Flooding Tanks	2 & 3
3.5.2	ECCS Subsystems - $T_{avg} \geq (305)°F$	3
3.5.3	ECCS Subsystems - $T_{avg} \leq (305)°F$	3
3.5.4	Borated Water Storage Tank	2 & 3
3.6	CONTAINMENT SYSTEMS	
3.6.1.1	Containment Integrity	3
3.6.1.3	Containment Air Locks	3
3.6.1.5	Internal Pressure	2
3.6.1.6	Air Temperature	2
3.6.1.8	Containment Ventilation System	3
3.6.2.1	Containment Spray System	3
3.6.2.2	Spray Additive System	2 & 3
3.6.2.3	Containment Cooling System	3
3.6.3	Iodine Cleanup System	3
3.6.4	Containment Isolation Valves	3
3.6.5.1	Hydrogen Analyzers	3
3.6.5.2	Electric Hydrogen Recombiners (Note 5)	3
3.6.6	Penetration Room Exhaust Air Cleanup System	3
3.7	PLANT SYSTEMS	
3.7.1.1	Safety Valves	3
3.7.1.2	Auxiliary Feedwater System	3
3.7.1.3	Condensate Storage Tank	2 & 3
3.7.1.4	Activity	2
3.7.1.5	Main Steam Line Isolation Valves	3
3.7.3	Component Cooling Water System	3
3.7.4	Service Water System	3
3.7.5	Ultimate Heat Sink	3
3.7.6	Flood Protection (optional)	3
3.7.7	Control Room Emergency Air Cleanup System	3
3.7.8	ECCS Pump Room Exhaust Air Cleanup System (optional)	3

B&W-TABLE 1 (Continued)

LCO		CRITERIA
3.8	ELECTRICAL POWER SYSTEMS	
3.8.1.1	A.C. Sources - Operating	3
3.8.1.2	A.C. Sources - Shutdown	Policy Statement (DHR)
3.8.2.1	A.C. Distribution - Operating	3
3.8.2.2	A.C. Distribution - Shutdown	Policy Statement (DHR)
3.8.2.3	D.C. Distribution - Operating	3
3.8.2.4	D.C. Distribution - Shutdown	Policy Statement (DHR)
3.9	REFUELING OPERATIONS	
3.9.1	Boron Concentration	2
3.9.2	Instrumentation	3
3.9.3	Decay Time	2
3.9.4	Containment Building Penetration	3
3.9.8.1	Residual Heat Removal and Coolant Circulation - All Water Levels	Policy Statement (DHR)
3.9.8.2	Residual Heat Removal and Coolant Circulation - Low Water Levels	Policy Statement (DHR)
3.9.9	Containment Purge and Exhaust Isolation System	3
3.9.10	Water Level - Reactor Vessel	2
3.9.11	Water Level - Storage Pool	2
3.9.12	Storage Pool Air Cleanup System	2

Notes:

1. Required for Modes 3 through 5. May be relocated for Modes 1 and 2.

2. The LCO for this system should be retained in STS. The Policy Statement criteria should not be used as the basis for relocating specific trip functions, channels, or instruments within these LCOs.

3. The staff is pursuing alternative approaches which would allow relocation of some of these LCOs on a schedule consistent with the schedule for development of the new STS. The staff is also initiating rulemaking to delete the requirement that RETS be included in Technical Specifications.

4. Because fires (either inside or outside the control room) can be a significant contributor to the core melt frequency and because the uncertainties with fire initiation frequency can be significant, the staff believes that this LCO should be retrained in the STS at this time. The staff will consider relocation of Remote Shutdown Instrumentation on a plant-specific basis.

5. This LCO will be considered for relocation to a licensee-controlled document on a plant-specific basis.

TABLE 2 (Note 1)

BABCOCK & WILCOX STANDARD TECHNICAL SPECIFICATION

LCOs WHICH MAY BE RELOCATED

LCO	
3.1	REACTIVITY CONTROL SYSTEMS
3.1.2.1	Flow Paths - Shutdown
3.1.2.2	Flow Paths - Operating
3.1.2.3	Makeup Pump - Shutdown
3.1.2.4	Makeup Pump - Operating
3.1.2.5	Decay Heat Removal Pump - Shutdown
3.1.2.6	Boric Acid Pumps - Shutdown
3.1.2.7	Boric Acid Pumps - Operating
3.1.2.8	Borated Water Source - Shutdown
3.1.2.9	Borated Water Source - Operating
3.1.3.3	Position Indication Channels - Operating (Note 2)
3.1.3.4	Position Indication Channels - Shutdown (Note 2)
3.1.3.5	Rod Drop Time (Note 2)
3.1.3.8	Rod Program
3.3	INSTRUMENTATION
3.3.3.2	Incore Detectors
3.3.3.3	Seismic Instrumentation
3.3.3.4	Meteorological Instrumentation
3.3.3.7	Chlorine Detection System
3.3.3.8	Fire Detection
3.3.3.9	Radioactive Liquid Effluent Monitor (Note 3)
3.3.3.10	Radioactive Gaseous Effluent Monitor (Note 3)
3.3.4	Turbine Overspeed Protection
3.4	REACTOR COOLANT SYSTEM
3.4.2	Safety Valves - Shutdown
3.4.6	Steam Generators Tube Surveillance (Note 4)
3.4.8	Chemistry
3.4.10.2	Pressurizer Temperatures
3.4.11	Structural Integrity ASME Code (Note 4)
3.4.12	RCS Vents
3.6	CONTAINMENT SYSTEMS
3.6.1.2	Containment Leakage (Note 5)
3.6.1.7	Containment Structural Integrity (Note 2)
3.7	PLANT SYSTEMS
3.7.2	Steam Generator Pressure/Temperature Limits
3.7.9	Snubbers
3.7.10	Sealed Source Contamination

B&W-TABLE 2 (Continued)

LCO	
3.7.11.1	Fire Suppression Water System
3.7.11.2	Spray and/or Sprinkler Systems
3.7.11.3	CO_2 System
3.7.11.4	Halon System
3.7.11.5	Fire Hose Stations
3.7.11.6	Yard Fire Hydrants and Hydrant Hose Houses
3.7.12	Fire Barrier Penetrations
3.7.13	Area Temperature Monitoring
3.9	REFUELING OPERATIONS
3.9.5	Communications
3.9.6	Fuel Handling Bridge
3.9.7	Crane Travel - Spent Fuel Storage Pool Building
3.10	SPECIAL TEST EXCEPTIONS
3.10.1	Shutdown Margin (Note 6)
3.10.2	Group Height Insertion Limits and Power Distribution Limits (Note 6)
3.10.3	Physics Tests (Note 6)
3.10.4	Reactor Coolant Loops (Note 6)
3.11	RADIOACTIVE EFFLUENTS (Note 3)
3.11.1.1	Concentration
3.11.1.2	Dose
3.11.1.3	Liquid Radwaste Treatment System
3.11.1.4	Liquid Holdup Tanks
3.11.2.1	Dose
3.11.2.2	Dose - Noble Gases
3.11.2.3	Dose - Iodine - 131, Tritium and Radionuclides in Particulate Form
3.11.2.4	Gaseous Radwaste Treatment Systems
3.11.2.5	Explosive Gas Mixture
3.11.2.6	Gas Storage Tanks
3.11.3	Solid Radioactive Waste
3.11.4	Total Dose
3.12	RADIOACTIVE ENVIRONMENTAL MONITORING (Note 3)
3.12.1	Monitoring Program
3.12.2	Land Use Census
3.12.3	Interlaboratory Comparison Program

Notes:

1. Specifications listed in this table may be relocated contingent upon NRC staff approval of the location of and controls over relocated requirements.

2. This LCO may be removed from the STS. However, if the associated Surveillance Requirement(s) is necessary to meet the OPERABILITY requirements for a retained LCO, the Surveillance Requirement(s) should be relocated to the retained LCO.

3. The staff is pursuing alternative approaches which would allow relocation of some of these LCOs on a schedule consistent with the schedule for development of the new STS. The staff is also initiating rulemaking to delete the requirement that RETS be included in Technical Specifications.

4. This LCO may be relocated out of Technical Specifications. However, the associated Surveillance Requirement(s) must be relocated to Technical Specification Section 4.0, Surveillance Requirements.

5. This LCO may be relocated. However, Pa, La, Ld, and Lt must be either retained in TS or in the Bases of the appropriate Containment LCO.

6. Special Test Exceptions may be included with corresponding LCOs.

APPENDIX B

RESULTS OF THE NRC STAFF REVIEW

WESTINGHOUSE OWNERS GROUP'S SUBMITTAL

RETENTION AND RELOCATION OF SPECIFIC TECHNICAL SPECIFICATIONS

APPENDIX B

TABLE 1

LCOs TO BE RETAINED IN WESTINGHOUSE STANDARD TECHNICAL SPECIFICATIONS

LCO		CRITERIA
3.1	REACTIVITY CONTROL SYSTEMS	
3.1.1.1	Shutdown Margin - Tave $\geq$ 200 deg. F (Note 1)	2
3.1.1.2	Shutdown Margin - Tave $\leq$ 200 deg. F (Note 1)	2
3.1.1.3	Moderator Temperature Coefficient	2
3.1.1.4	Minimum Temperature for Criticality	2
3.1.3.1	Moveable Control Assemblies - Group Height	3
3.1.3.5	Shutdown Rod Insertion Limit	2
3.1.3.6	Control Rod Insertion Limits	2
3.2	POWER DISTRIBUTION LIMITS	
3.2.1	Axial Flux Difference	2
3.2.2	Heat Flux Hot Channel Factor	2
3.2.3	RCS Flow Rate and Nuclear Enthalpy Rise Hot Channel Factor	2
3.2.4	Quadrant Power Tilt Ratio	2
3.2.5	DNB Parameters	2
3.3.	INSTRUMENTATION	
3.3.1	Reactor Trip System Instrumentation (Note 2)	3
3.3.2	Engineered Safety Feature Actuation System Instrumentation (Note 2)	3
3.3.3.1	Radiation Monitoring Instrumentation (Notes 2 & 3)	1 & 3
3.3.3.5	Remote Shutdown Instrumentation (Notes 2 & 4)	Risk
3.3.3.6	Accident Monitoring Instrumentation	3
3.4	REACTOR COOLANT SYSTEM	
3.4.1.1	RCS Startup and Power Operation	3
3.4.1.2	RCS Hot Standby	3
3.4.1.3	RCS Hot Shutdown	3
3.4.1.4.1	RCS Cold Shutdown - Loops Filled	3
3.4.1.4.2	RCS Cold Shutdown - Loops Not Filled	3
3.4.1.5	RCS Isolated Loop (Optional)	2
3.4.1.6	RCS Isolated Loop Startup (Optional)	2
3.4.2.2	RCS Safety valves - Operation	3
3.4.3	Pressurizer	2 & 3
3.4.4	Relief Valves	3
3.4.6.1	Leakage Detection System	1
3.4.6.2	Operational Leakage	2
3.4.8	Specific Activity	2
3.4.9.1	Pressure/Temperature Limits - RCS	2
3.4.9.3	Overpressure Protection Systems	2

W-TABLE 1 (Continued)

LCO		CRITERIA
3.5	EMERGENCY CORE COOLING SYSTEMS	
3.5.1.1	Cold Leg Injection Accumulators	2 & 3
3.5.1.2	Upper Head Injection Accumulators (STS REV-5)	2 & 3
3.5.2	ECCS Subsystems, Tavg $\geq$ 350 deg F	3
3.5.3	ECCS Subsystems, Tavg $<$ 350 deg F	3
3.5.4.1	Boron Injection Tank	2 & 3
3.5.5	Refueling Water Storage Tank	2 & 3
3.6	CONTAINMENT SYSTEMS	
3.6.1.1	Containment Integrity	3
3.6.1.3	Containment Air Locks	3
3.6.1.4	Containment Isolation Valve and Channel Weld Pressurization System (Optional)	3
3.6.1.5	Internal Pressure	2
3.6.1.6	Air Temperature	2
3.6.1.8	Containment Ventilation System	3
3.6.1.9	Shield Building Air Cleanup System (Ice Condenser)	3
3.6.2.1	Containment Quench Spray System (Sub-ATM Containment)	3
3.6.2.1	Containment Spray System	3
3.6.2.2	Containment Recirculation Spray System (Sub-ATM Containment)	3
3.6.2.2	Spray Additive System (Optional)	2 & 3
3.6.2.3	Containment Cooling System (Optional)	3
3.6.3	Iodine Cleanup System (Optional)	3
3.6.4	Containment Isolation Valves (minus response time)	3
3.6.5.1	Hydrogen Monitors	3
3.6.5.2	Electric Hydrogen Recombiners (Note 5)	3
3.6.5.3	Hydrogen Control Distributed Ignition System (STS REV-5, Ice Condenser)	3
3.6.5.4	Hydrogen Mixing System (Optional)	3
3.6.6	Penetration Room Exhaust Air Cleanup System (Optional)	3
3.6.7	Vacuum Relief Valves	3
3.6.7.1	Ice Bed (Ice Condenser)	2 & 3
3.6.7.3	Ice Condenser Doors (Ice Condenser)	2 & 3
3.6.7.5	Divider Barrier Personnel Access Doors and Equipment Hatches (Ice Condenser)	2 & 3
3.6.7.6	Containment Air Recirculation Systems (Ice Condenser)	2 & 3
3.6.7.7	Floor Drains (Ice Condenser)	2 & 3
3.6.7.8	Refueling Canal Drains (Ice Condenser)	3
3.6.7.9	Divider Barrier Seal (Ice Condenser)	2 & 3
3.6.8.1	Shield Building Air Cleanup System (Dual)	3
3.6.8.2	Shield Building Integrity (Dual)	3

W-TABLE 1 (Continued)

LCO		CRITERIA
3.7	PLANT SYSTEMS	
3.7.1.1	Turbine Cycle Safety Valves	3
3.7.1.2	Auxiliary Feedwater System	2 & 3
3.7.1.3	Condensate Storage Tank	2 & 3
3.7.1.4	Activity	2
3.7.1.5	Main Steam Line Isolation Valves	3
3.7.3	Component Cooling Water System	3
3.7.4	Service Water System	3
3.7.5	Ultimate Heat Sink (Optional)	3
3.7.7	Control Room Emergency Air Cleanup System	3
3.7.8	ECCS Pump Room Emergency Air Cleanup System	3
3.8	ELECTRICAL POWER SYSTEMS	
3.8.1.1	A.C. Sources - Operating	3
3.8.1.2	A.C. Sources - Shutdown	3
3.8.2.1	D.C. Sources - Operating	3
3.8.2.2	D.C. Sources - Shutdown	3
3.8.3.1	Onsite Power Distribution - Operating	3
3.8.3.2	Onsite Power Distribution - Shutdown	3
3.9	REFUELING OPERATIONS	
3.9.1	Boron Concentration	2
3.9.2	Instrumentation	3
3.9.3	Decay Time	2
3.9.4	Containment Building Penetrations	3
3.9.8.1	Residual Heat Removal and Coolant Circulation - High Water Level	Policy Statement (RHR)
3.9.8.2	Residual Heat Removal and Coolant Circulation - Low Water Level	Policy Statement (RHR)
3.9.9	Containment Purge and Exhaust Isolation System	3
3.9.10	Water Level - Reactor Vessel	2
3.9.11	Water Level - Storage Pool	2
3.9.12	Storage Pool Air Cleanup System	3

Notes:

1. Required for Modes 3 through 5. May be relocated for Modes 1 and 2.

2. The LCO for this system should be retained in STS. The Policy Statement criteria should not be used as the basis for relocating specific trip functions, channels, or instruments within these LCOs.

3. The staff is pursuing alternative approaches which would allow relocation of some of these LCOs on a schedule consistent with the schedule for development of the new STS. The staff is also initiating rulemaking to delete the requirement that RETS be included in Technical Specifications.

Notes:

4. Because fires (either inside or outside the control room) can be a significant contributor to the core melt frequency and because the uncertainties with fire initiation frequency can be significant, the staff believes that this LCO should be retained in the STS at this time. The staff will consider relocation of Remote Shutdown Instrumentation on a plant-specific basis.

5. This LCO will be considered for relocation to a licensee-controlled document on a plant-specific basis.

TABLE 2 (Note 1)

WESTINGHOUSE STANDARD TECHNICAL SPECIFICATIONS
LCOs WHICH MAY BE RELOCATED

LCO	
3.1	REACTIVITY CONTROL SYSTEMS
3.1.2.1	Flow Paths - Shutdown
3.1.2.2	Flow Paths - Operating
3.1.2.3	Charging Pumps - Shutdown
3.1.2.4	Charging pumps - Operating
3.1.2.5	Borated Water Sources - Shutdown
3.1.2.6	Borated Water Sources - Operating
3.1.3.2	Position Indication System - Operating (Note 2)
3.1.3.3	Position Indication System - Shutdown (Note 2)
3.1.3.4	Rod Drop Time (Note 2)
3.3	INSTRUMENTATION
3.3.3.2	Movable Incore Detectors
3.3.3.3	Seismic Instrumentation
3.3.3.4	Meteorological Instrumentation
3.3.3.7	Chlorine Detection Systems
3.3.3.8	Fire Detection Instrumentation
3.3.3.9	Loose-Part Detection Instrumentation
3.3.3.10	Radioactive Liquid Effluent Monitoring Instrumentation (Note 3)
3.3.3.11	Radioactive Gaseous Effluent Monitoring Instrumentation (STS REV - 5) (Note 3)
3.3.4	Turbine Overspeed Protection
3.4	REACTOR COOLANT SYSTEM
3.4.2.1	RCS Safety Valves - Shutdown
3.4.5	Steam Generators (Note 4)
3.4.7	Chemistry
3.4.9.2	Pressure/Temperature Limits - Pressurizer
3.4.10	RCS Structural Intgerity (Note 4)
3.4.11	Reactor Coolant System Vents (STS REV-5)
3.5	EMERGENCY CORE COOLING SYSTEMS
3.5.4.2	Heat Tracing

W-TABLE 2 (Continued)

LCO	
3.6	CONTAINMENT SYSTEMS
3.6.1.2	Containment Leakage (Note 5)
3.6.1.7	Containment Structural Integrity (Note 2)
3.6.1.8	Shield Building Structural Integrity (Ice Condenser) (Note 2)
3.6.4	Containment Isolation Valves (response times) (Note 2)
3.6.5.1	Steam Jet Air Ejector (Sub-ATM Containment)
3.6.5.2	Mechanical Vacuum Pumps (SUB-ATM. Containment)
3.6.5.3	Hydroden Purge Cleanup System
3.6.7.2	Ice Bed Temperature Monitoring System (Ice Condenser)
3.6.7.4	Inlet Door Position Monitoring System (Ice Condenser)
3.6.8.3	Shield Building Structural Integrity (Dual)
3.7	PLANT SYSTEMS
3.7.2	Steam Generator Pressure/Temperature Limitation
3.7.6	Flood Protection (Optional)
3.7.9	Snubbers
3.7.10	Sealed Source Contamination
3.7.11.1	Fire Suppression Water System
3.7.11.2	Spray and/or Sprinkler Systems
3.7.11.3	CO2 Systems
3.7.11.4	Halon Systems
3.7.11.5	Fire Hose Stations
3.7.11.6	Yard Fire Hydrants and Hydrant Hose Houses
3.7.12	Fire Rated Assemblies
3.7.13	Area Temperature Monitoring
3.8	ELECTRICAL POWER SYSTEMS
3.8.4.1	A.C. Circuits Inside Primary Containment (STS REV-5)
3.8.4.2	Containment Penetration Conductor Overcurrent Protective Devices
3.8.4.3	Motor-Operated Valves Thermal Overload Protection and Bypass Devices
3.9	REFUELING OPERATIONS
3.9.5	Communications
3.9.6	Manipulator Crane
3.9.7	Crane Travel - Spent Fuel Storage Pool
3.10	SPECIAL TEST EXCEPTIONS (Note 6)

W-TABLE 2 (Continued)

LCO	
3.11	RADIOACTIVE EFFLUENTS (Note 3)
3.11.1.1	Liquid Effluents Concentration (STS REV-5)
3.11.1.2	Dose (STS REV-5)
3.11.1.3	Liquid Radwaste Treatment System (STS REV-5)
3.11.1.4	Liquid Holdup Tanks (STS REV-5)
3.11.2.1	Dose Rate (STS REV-5)
3.11.2.2	Dose - Noble Gases (STS REV-5)
3.11.2.3	Dose I-131, I-133, Tritium and Radioactive Material In Particulate Form
3.11.2.4	Gaseous Radwaste Treatment (STS REV-5)
3.11.2.5	Explosive Gas Mixture (STS REV-5)
3.11.2.6	Gas Storage Tanks
3.11.3	Solid Radioactive Waste (STS REV-5)
3.11.4	Total Dose (STS REV-5)
3.12	RADIOLOGICAL ENVIRONMENTAL MONITORING (Note 3)
3.12.1	Monitoring Program (STS REV-5)
3.12.2	Land Use Census (STS REV-5)
3.12.3	Interlaboratory Comparison Program (STS REV-5)

Notes:

1. LCOs listed in this table may be relocated contingent upon NRC staff approval of the location of and controls over relocated requirements.

2. This LCO may be removed from the STS. However, if the associated Surveillance Requirement(s) is necessary to meet the OPERABILITY requirements for a retained LCO, the Surveillance Requirement(s) should be relocated to the retained LCO.

3. The staff is pursuing alternative approaches which would allow relocation of some of these LCOs on a schedule consistent with the schedule for development of the new STS. The staff is also initiating rulemaking to delete the requirement that RETS be included in Technical Specifications.

4. This LCO may be relocated out of Technical Specifications. However, the associated Surveillance Requirement(s) must be relocated to Technical Specification Section 4.0, Surveillance Requirements.

5. This LCO may be relocated. However, Pa, La, Ld and Lt must be either retained in TS or in the Bases of the appropriate containment LCO.

6. Special Test exceptions 3.10.1 through 3.10.4 may be included with corresponding LCOs which are remaining in Technical Specifications. Special Test Exception 3.10.5 may be relocated outside of Technical Specifications along with LCO 3.1.3.3.

APPENDIX C

RESULTS OF THE NRC STAFF REVIEW

COMBUSTION ENGINEERING OWNERS GROUP'S SUBMITTAL

RETENTION AND RELOCATION OF SPECIFIC TECHNICAL SPECIFICATIONS

APPENDIX C

TABLE 1

LCOs TO BE RETAINED IN COMBUSTION ENGINEERING
STANDARD TECHNICAL SPECIFICATIONS

LCO		CRITERIA
3.1	REACTIVITY CONTROL SYSTEMS	
3.1.1.1	Shutdown Margin --Tcold. $\geq$ 210F (Note 1)	2
3.1.1.2	Shutdown Margin - Tcold. $\leq$ 210F (Note 1)	2
3.1.1.3	Moderator Temperature Coefficient	2
3.1.1.4	Minimum Temperature for Criticality	2
3.1.3.1	CEA Position	2 & 3
3.1.3.5	Shutdown CEA Insertion Limit	2
3.1.3.6	Regulating CEA Insertion Limits	2
3.1.3.7	Part Length CEA Insertion Limits	2
3.2	POWER DISTRIBUTION LIMITS	
3.2.1	Linear Heat Rate	2
3.2.2	Planar Radial Peaking Factors--Fxy	2
3.2.3	Azimuthal Power Tilt -- Tq	2
3.2.4	DNBR Margin	2
3.2.5	RCS Flow Rate	2
3.2.6	Reactor Coolant Cold Leg Temperature	2
3.2.7	Axial Shape Index	2
3.2.8	Pressurizer Pressure	2
3.3	INSTRUMENTATION	
3.3.1	Reactor Protective Instrumentation (Note 2)	3
3.3.2	ESFAS Instrumentation (Note 2)	3
3.3.3.1	Radiation Monitoring Instrumentation (Notes 2 & 3)	3
3.3.3.5	Remote Shutdown System (Notes 2 & 4)	Risk
3.3.3.6	Post-Accident Monitoring Instrumentation	3
3.4	REACTOR COOLANT SYSTEM	
3.4.1.1	Startup and Power Operation	2 & 3
3.4.1.2	Hot Standby	2 & 3
3.4.1.3	Hot Shutdown	2 & 3
3.4.1.4.1	Cold Shutdown - Loops filled	2 & 3
3.4.1.4.2.	Cold Shutdown - Loops not filled	2 & 3

CE-TABLE 1 (Continued)

LCO		CRITERIA
3.4.2.2	Safety Valves - Operating	3
3.4.3.1	Pressurizer	2 & 3
3.4.4	Relief Valve (PORV Only)	3
3.4.6.1	Leakage Detection Systems	3
3.4.6.2	Operational Leakage	3
3.4.8	Specific Activity	2
3.4.9.1	Reactor Coolant System	2
3.4.9.3	Overpressure Protection Systems-LTOP	2
3.5	EMERGENCY CORE COOLING SYSTEMS (ECCS)	
3.5.1	Safety Injection Tanks	3
3.5.2	ECCS Subsystems -- Tcold. $\geq$ 350F	3
3.5.3	ECCS Subsystems -- Tcold. $\leq$ 350F	3
3.5.4	Refueling Water Tank	3
3.6	CONTAINMENT SYSTEMS	
3.6.1.1	Containment Integrity	3
3.6.1.3	Containment Air Locks	3
3.6.1.5	Internal Pressure	2
3.6.1.6	Air Temperature	2
3.6.1.8	Containment Ventilation System (Optional)	3
3.6.2.1	Containment Spray System	3
3.6.2.2	Spray Additive System (Optional)	3
3.6.2.3	Containment Cooling System (Optional)	3
3.6.3	Iodine Cleanup System (Optional)	3
3.6.4	Containment Isolation Valves	3
3.6.5.1	Hydrogen Monitors (Note 5)	3
3.6.5.2	Electric Hydrogen Combiners (Note 5)	3
3.6.5.4	Hydrogen Mixing System	3
3.6.6	Penetration Room Exhaust Air Cleanup System (Optional)	3
3.6.7	Vacuum Relief Valves (Optional)	3
3.6.8.1	Shield Building Air Cleanup System (Optional)	3
3.7	PLANT SYSTEMS	
3.7.1.1	Safety Valves	3
3.7.1.2	Auxiliary Feedwater System	3
3.7.1.3	Condensate Storage Tank	3
3.7.1.4	Activity	3
3.7.1.5	Main Steam Isolation Valves	3

CE-TABLE 1 (Continued)

LCO		CRITERIA
3.7.3	Component Cooling Water System	3
3.7.4	Service Water System	3
3.7.5	Ultimate Heat Sink	3
3.7.7	Essential Chilled Water System	3
3.7.9	ECCS Pump Room Air Exhaust Cleanup System (Optional)	3
3.8	ELECTRICAL POWER SYSTEMS	
3.8.1.1	A.C. Sources - Operating	3
3.8.1.2	A.C. Sources - Shutdown	3
3.8.2.1	D.C. Sources - Operating	3
3.8.2.2	D.C. Sources - Shutdown	3
3.8.3.1	Onsite Power Distribution Sources - Operating	3
3.8.3.2	Onsite Power Distribution Sources - Shutdown	3
3.9	REFUELING OPERATIONS	
3.9.1	Boron Concentration	2
3.9.2	Instrumentation	3
3.9.3	Decay Time	2
3.9.4	Containment Building Penetrations	3
3.9.8.1	Shutdown Cooling and Coolant Circulation - High Water Level	2
3.9.8.2	Shutdown Cooling and Coolant Circulation - Low Water Level	2
3.9.9	Containment Purge Valve Isolation System	3
3.9.10	Water Level-Reactor Vessel	2
3.9.11	Water Level-Storage Pool	2
3.9.12	Fuel Building Air Cleanup System	3

Notes:

1. Required for Modes 3 through 5. May be relocated for Modes 1 and 2.

2. LCOs for this system should be retained in STS. The Policy Statement Criteria should not be used to relocate specific trip functions, channels, or instruments within these LCOs.

3. The staff is pursuing alternative approaches which would allow relocation of some of these LCOs on a schedule consistent with the schedule for development of the new STS. The staff is also initiating rulemaking to delete the requirement that RETS be included in Technical Specifications.

4. Because fires (either inside or outside the control room) can be a significant contributor to the core melt frequency and because the uncertainties with fire initiation frequency can be significant, the staff believes that this LCO should be retained in the STS at this time. The staff will consider relocation of Remote Shutdown Instrumentation on a plant-specific basis.

5. This LCO will be considered for relocation to a licensee-controlled document on a plant-specific basis.

TABLE 2 (Note 1)

COMBUSTION ENGINEERING STANDARD TECHNICAL SPECIFICATION
LCOs WHICH MAY BE RELOCATED

LCO	
3.1	REACTIVITY CONTROL SYSTEMS
3.1.2.1	Flow Paths -- Shutdown
3.1.2.2	Flow Paths-Operating
3.1.2.3	Charging Pumps -- Shutdown
3.1.2.4	Charging Pumps-Operating
3.1.2.5	Boric Acid Makeup Pumps -- Shutdown
3.1.2.6	Boric Acid Makeup Pumps-Operating
3.1.2.7	Borated Water Source - Shutdown
3.1.2.8	Borated Water Sources - Operating
3.1.3.2	Position Indicator Channels-Operating (Note 2)
3.1.3.3	Position Indicator Channels-Shutdown (Note 2)
3.1.3.4	CEA Drop Time (Note 2)
3.3	INSTRUMENTATION
3.3.3.2	Incore Detectors
3.3.3.3	Seismic Instrumentation
3.3.3.4	Meteorological Instrumentation
3.3.3.7	Fire Detection Instrumentation
3.3.3.8	Chlorine Detection Systems
3.3.3.9	Loose Part Detection Instrumentation
3.3.3.10	Radioactive Liquid Effluent Monitor (Note 3)
3.3.3.11	Radioactive Gaseous Effuent Monitor (Note 3)
3.3.4	Turbine Overspeed Protection
3.4	REACTOR COOLANT SYSTEM
3.4.2.1	Safety Valves-Shutdown
3.4.4	Relief Valves (Non PORV)
3.4.5	Steam Generators (Note 4)
3.4.7	Chemistry
3.4.9.2	Pressurizer Heatup/Cooldown Limits
3.4.10	Structural Integrity (Note 4)
3.4.11	Reactor Coolant System Vents
3.6	CONTAINMENT SYSTEMS
3.6.1.2	Containment Leakage (Note 5)
3.6.1.4	Containment Isolation Valve and Channel Weld Pressure System
3.6.1.7	Containment Vessel Structural Integrity (Note 2)
3.6.5.3	Hydrogen Purge Cleanup System
3.6.8.2	Shield Building Integrity
3.6.8.3	Shield Building Structural Integrity (Note 2)

CE-TABLE 2 (Continued)

LCO	
3.7	PLANT SYSTEMS
3.7.2	Steam Generator Pressure/Temperature Limitation
3.7.6	Flood Protection
3.7.8	Control Room Emergency Air Cleanup System
3.7.10	Snubbers
3.7.11	Sealed Source Contamination
3.7.12	Fire Suppression Systems
3.7.12.1	Fire Suppression Water System
3.7.12.2	Spray and/or Sprinkler Systems
3.7.12.3	CO_2 Systems
3.7.12.4	Halon Systems
3.7.12.5	Fire Hose Stations
3.7.12.6	Yard Fire Hydrants and Hose Houses
3.7.13	Fire-Rated Assemblies
3.8	ELECTRICAL POWER SYSTEMS
3.8.4.1	Containment Penetration Conductor Overcurrent Protection Device
3.8.4.2	Motor-Operated Valves-Thermal Overload Protection
3.9	REFUELING OPERATIONS
3.9.5	Communication
3.9.6	Manipulator Crane (Refueling Machine)
3.9.7	Crane Travel - Spent Fuel Pool Building
3.10	SPECIAL TEST EXCEPTIONS
3.10.1	Shutdown Margin (Note 6)
3.10.2	Group Height, Insertion, and Power Dist. (Note 6)
3.10.3	Reactor Coolant Loops (Note 6)
3.10.4	CEA Position, Reg CEA Ins, and Cold Leg Temp. (Note 6)
3.11	RADIOACTIVE EFFLUENTS (Note 3)
3.11.1.1	Liquid Waste Discharge to Evap. Ponds - Concentration
3.11.1.2	Liquid Waste Discharge to Evap. Ponds Dose
3.11.1.3	Liquid Holdup Tanks
3.11.2.1	Gaseous Effluents - Dose Rate
3.11.2.2	Gaseous Effluents - Dose-Noble Gases
3.11.2.3	Gaseous Effluents - Dose--I-131, 133, Tritium & Radionuclides
3.11.2.4	Gaseous Radwaste Treatment
3.11.2.5	Explosive Gas Mixture
3.11.2.6	Gas Storage Tanks
3.11.3	Solid Radioactive Waste
3.11.4	Total Dose

CE-TABLE 2 (Continued)

LCO	
3.12	RADIOLOGICAL ENVIRONMENTAL MONITORING (Note 3)
3.12.1	Monitoring Program
3.12.2	Land Use Census
3.12.3	Interlaboratory Comparison Program

Notes:

1. Specifications listed in this table may be relocated contingent upon NRC staff approval of the location of and controls over relocated requirements.

2. This LCO may be removed from the STS. However, if the associated Surveillance Requirement(s) is necessary to meet the OPERABILITY requirements for a retained LCO, the Surveillance Requirement(s) should be relocated to the retained LCO.

3. The staff is pursuing alternative approaches which would allow relocation of some of these LCOs on a schedule consistent with the schedule for development of the new STS. The staff is also initiating rulemaking to delete the requirement that RETS be included in Technical Specifications.

4. This LCO may be relocated out of Technical Specifications. However, the associated Surveillance Requirement(s) must be relocated to Technical Specificat Section 4.0, Surveillance Requirements.

5. This LCO may be relocated. However, Pa, La, Ld, and Lt must be either retained in TS or in the Bases of the appropriate containment LCO.

6. Special Test Exceptions may be included with the corresponding LCOs.

APPENDIX D

RESULTS OF THE NRC STAFF REVIEW

BWR OWNERS GROUP'S SUBMITTAL

RETENTION AND RELOCATION OF SPECIFIC TECHNICAL SPECIFICATIONS

APPENDIX D

TABLE 1

LCOs TO BE RETAINED IN GENERAL ELECTRIC STANDARD TECHNICAL SPECIFICATIONS

LCO	REPORT ITEM		PLANT*	CRITERIA
3.1		REACTIVITY CONTROL SYSTEMS		
3.1.1	1	Shutdown Margin	H,GG	2
3.1.3		Control Rods		
	3	Control Rods Operability	H,GG	3
	5	Maximum Scram Times (BWR/6)	GG	3
	6	Average Scram Times	H	3
	7	Fastest 3-out-of-4 Scram Times	H	3
	8	Scram Accumulators	H,GG	3
	9	Control Rod Drive Coupling	H,GG	3
	10	Control Rod Position Indication	H,GG	3
	11	Control Rod Drive Housing Support	H,GG	3
3.1.4		Control Rod Program Controls		
	12	Rod Worth Minimizer (BWR/2-5)	H	3
	13	Control Rod Withdrawal (BWR/6)	GG	2
	14	Rod Pattern Control System (BWR/6)	GG	3
	15	Rod Sequence Control Systems	H	3
	16	Rod Block Monitor	H	3
3.1.5	17	Standby Liquid Control System	H,GG	Policy Statement(SBLC)
3.1.6	18	Scram Discharge Volume Vent and Drain Valves	H	3
3.2		POWER DISTRIBUTION LIMITS		
3.2.1	19	Average Planar Linear Heat Generation (APLHGR)	H,GG	2
3.2.3	21	Minimum Critical Power Ratio (MCPR)	H,GG	2
3.2.4	22	Linear Heat Generation Rate (LHGR)	H,GG	2

*H-Hatch Unit 2
GG-Grand Gulf

BWR-TABLE 1 (Continued)

LCO	REPORT ITEM		PLANT	CRITERIA
3.3		INSTRUMENTATION		
3.3.1		Reactor Protection System Instrumentation (Note 1)		
	23	Average Power Range Monitors (APRM)	H,GG	3
	24	Intermediate Range Monitors (IRM)	H,GG	3
	25	Vessel Pressure - High	H,GG	3
	26	Reactor Vessel Water Level - Low (Level 3)	H,GG	3
	27	Reactor Vessel Water Level - High (Level 8)	GG	3
	28	MSIV Closure	H,GG	3
	29	MSL Radiation - High (RPS Inst.)	H,GG	3
	30	Drywell Pressure - High	H,GG	3
	31	SDV Water Level - High	H,GG	3
	32	TSV Closure	H,GG	3
	33	TCV Closure	H,GG	3
	34	Mode Switch	H,GG	3
	35	Manual Scram	H,GG	3
3.3.2		Isolation Actuation Instrumentation (Note 1)		
		Primary Containment Isolation		
	36	Reactor Vessel Water Level - Low (Level 3)	H	3
	37	Reactor Vessel Water Level - Low (Level 2)	H,GG	3
	38	Reactor Vessel Water Level - Low (Level 1)	H,GG	3
	39	Drywell Pressure - High	H,GG	3
	40	Containment and Drywell Ventilation Exhaust Radiation - High High	GG	3
		Main Steam Line Isolation		
	41	Manual Initiation (Primary Containment)	GG	3
	42	Reactor Vessel Water Level - Low (Level 1)	GG	3
	43	Main Steam Line Radiation - High (MSLI)	H,GG	3
	44	Main Steam Line Pressure - Low	H,GG	3
	45	Main Steam Line Flow - High	H,GG	1 & 3

BWR-TABLE 1 (Continued)

LCO	REPORT ITEM		PLANT	CRITERIA
	46	Condenser Vacuum - Low	~~H,GG~~	3
	47	Main Steam Line Tunnel Temperature - High	~~H,GG~~	1 & 3
	48	Main Steam Line Tunnel Differential Temperature - High	~~GG~~	1 & 3
	49	Manual Initiation (MSLI)	~~GG~~	3
	50	Turbine Building Area Temperature - High	~~H~~	1 & 3
		Secondary Containment Isolation		
	51	Reactor Building Exhaust Radiation - High	~~H~~	3
	52	Reactor Vessel Water Level - Low (Level 2)	~~H,GG~~	3
	53	Drywell Pressure - High	~~H,GG~~	3
	54	Refueling Floor Exhaust Radiation - High	~~H~~	3
	55	Fuel Handling Area Ventilation Exhaust Radiation - High High	~~GG~~	3
	56	Fuel Handling Area Pool Sweep Exhaust Radiation - High High	~~GG~~	3
		Reactor Water Cleanup System Isolation		
	57	Manual Initiation (Secondary Containment)	~~GG~~	3
	58	Differential Flow - High	~~H,GG~~	1 & 3
	59	Differential Flow Timer	~~GG~~	2
	60	Equipment Area Temperature - High	~~H,GG~~	1 & 3
	61	Equipment Area Differential Temperature - High	~~H,GG~~	1 & 3
	62	Reactor Vessel Water Level - (Level 2)	~~H,GG~~	3
	63	Main Steam Line Tunnel Temperature - High	~~GG~~	1 & 3
	64	Main Steam Line Tunnel Differential Temperature - High	~~GG~~	1 & 3
	65	SLCS Initiation	~~H,GG~~	Policy Statement (

BWR-TABLE 1 (Continued)

LCO	REPORT ITEM		PLANT	CRITERIA
		High Pressure Coolant Injection System Isolation		
	66	Manual Initiation (RWCS)	~~GG~~	3
	67	HPCI Steam Line Flow - High	~~H~~	1 & 3
	68	HPCI Steam Supply Pressure - Low	~~H~~	3
	69	HPCI Turbine Exhaust Diaphragm Pressure - High	~~H~~	3
	70	HPCI Pipe Penetration Room Temperature - High	~~H~~	1 & 3
	71	Suppression Pool Area Ambient Temperature - High	~~H~~	1 & 3
	72	Suppression Pool Area Differential Temperature - High	~~H~~	1 & 3
	73	Suppression Pool Area Temperature Timer Relays	~~H~~	2 & 3
	74	Emergency Area Cooler Temperature - High	~~H~~	1 & 3
	76	Logic Power Monitor	~~H~~	3
		Reactor Core Isolation Cooling System Isolation		
	77	RCIC Steam Line Flow - High	~~H,GG~~	1 & 3
	78	RCIC Steam Supply Pressure - Low	~~H,GG~~	Policy Statement
	79	RCIC Turbine Exhaust Diaphragm Pressure - High	~~H,GG~~	Policy Statement
	80	RCIC Equipment Area Temperature - High	~~H,GG~~	1 & 3
	81	Suppression Pool Area Ambient Temperature - High	~~H~~	1 & 3
	82	Suppression Pool Area Differential Temperature - High	~~H~~	1 & 3
	83	Suppression Pool Area Temperature Timer Relays	~~H~~	2 & 3
	85	Logic Power Monitor	~~H~~	3
	86	RCIC Equipment Room Differential Temperature - High	~~GG~~	1 & 3
	87	Main Steam Line Tunnel Temperature - High	~~GG~~	1 & 3
	88	Main Steam Line Tunnel Differential Temperature - High	~~GG~~	1 & 3

BWR-TABLE 1 (Continued)

LCO	REPORT ITEM		PLANT	CRITERIA
	89	Main Steam Line Tunnel Temperature Timer	~~GG~~	3
	90	RHR Equipment Room Temperature - High	~~GG~~	1 & 3
	91	RHR Equipment Room Differential Temperature - High	~~GG~~	1 & 3
	92	RHR/RCIC Steam Line Flow - High	~~GG~~	1 & 3
		RHR System Isolation		
	93	Manual Initiation (RCIC) ?	~~GG~~	3
	94	RHR Equipment Area Temperature - High	~~GG~~	1 & 3
	95	RHR Equipment Room (Area) Differential Temperature - High	~~GG~~	1 & 3
	96	Reactor Vessel Water Level - Low (Level 3)	~~H,GG~~	3
	97	Reactor Vessel (RHR Cut-In Permissive) Pressure - High	~~H,GG~~	Policy Statement (R
	98	Drywell Pressure - High	~~GG~~	Policy Statement (R
	99	Manual Initiation (RHR)	~~GG~~	
3.3.3	(Sw 12/6 STS Item 6.e pg 3.3.5-26)	Reactor Vessel Water Level-Low (Level 1) ECCS Actuation Instrumentation (Note 1) RHR (LPCI/LPCS/Core Spray)		
	100	Reactor Vessel Water Level - Low (Level 1)	~~H,GG~~	3
	101	Drywell Pressure - High	~~H,GG~~	3
	102	RHR Pump Time Delay	~~H,GG~~	3
	103	Manual Initiation RHR (LPCI/LPCS/Core Spray)	~~GG~~	3
	104	Reactor Steam Dome Pressure - Low	~~H,GG~~	3
	105	Reactor Vessel Shroud Level - Low	~~H~~	3
	106	Logic Power Monitor	~~H~~	3
		Automatic Depressurization System		
	106A	Control Power Monitor	~~H~~	3
	107	Reactor Vessel Water Level Low (Level 1)	~~H,GG~~	3
	108	Drywell Pressure - High	~~H,GG~~	3
	109	ADS Initiation Timer	~~H,GG~~	3
	110	Low Water Level Timer	~~H~~	3

BWR-TABLE 1 (Continued)

LCO	REPORT ITEM		PLANT	CRITERIA
	111	Reactor Vessel Water Level Low (Level 3)	~~H,GG~~	3
	112	LPCI/LPCS/Core Spray Discharge Pressure - High	~~H,GG~~	3
	112A	ADS Bypass Timer	~~GG~~	3
		High Pressure Core Spray		
	112B	Manual Inhibit (ADS)	~~GG~~	3
	113	Manual Initiation (ADS)	~~GG~~	3
	114	Drywell Pressure - High	~~GG~~	3
	115	Reactor Vessel Water Level Low (Level 2)	~~GG~~	3
	116	Reactor Vessel Water Level High (Level 8)	~~GG~~	2
	117	CST Level - Low	~~GG~~	3
	118	Supp. Pool Water Level - High	~~GG~~	3
		HPCI		
	119	Manual Initiation (HPCS)	~~GG~~	3
	120	Drywell Pressure - High	~~H~~	3
	121	Reactor Vessel Water Level - Low (Level 2)	~~H~~	3
	122	Reactor Vessel Water Level - High (Level 8)	~~H~~	2
	123	Condensate Storage Tank Level - Low	~~H~~	3
	124	Suppression Chamber Water Level - High	~~H~~	3
	106	Logic Power Monitor ECCS Inst.	~~H~~	3
	125	Loss of Power	~~GG~~	3
	126	Reactor Pressure - High (Low Low Set Interlock)	~~H~~	3
3.3.4		Recirculation Pump Trip Actuation Instrumentation		
	127	EOC-RPT	~~H,GG~~	3
	128	ATWS-RPT	~~H,GG~~	Policy Statement (
3.3.5		RCIC Instrumentation		
	129	Reactor Vessel Water Level - Low (Level 2)	~~H,GG~~	Policy Statement (
	130	Reactor Vessel Water Level - High (Level 8)	~~GG~~	Policy Statement (

BWR-TABLE 1 (Continued)

LCO	REPORT ITEM		PLANT	CRITERIA
	131	CST Level - Low	~~H,GG~~	Policy Statement (I
	132	Supp. Pool Water Level - High	~~H,GG~~	3
	133	Manual Initiation (RCIC)	~~GG~~	2
3.3.6		Control Rod ~~Withdrawal~~ Block Instrumentation		
	134	Rod Pattern Control System	~~GG~~	3
	136	RBM	~~H~~	3
	141	Reactor Mode Switch Shutdown Position →	~~GG~~ GG	3
		SRMs PCS Recirc. Flow Inop, Downscale, Upscale H, GG.		
3.3.7		Monitoring Instrumentation		
	142-150	Radiation Monitoring Instrumentation (Notes 1 & 2)		
	153	Remote Shutdown Instrumentation (Notes 1 & 3)	H,~~GG~~	Risk
	154-181	Accident Monitoring Instrumentation	H,~~GG~~	1, 2 & 3
	182	SRM	H,~~GG~~	2
3.3.8		Plant Systems Actuation Instrumentation		
	190	Drywell Press (Cont. Spray)	~~GG~~	3
	191	Cont. Press (Cont. Spray)	~~GG~~	3
	192	Water Level 1 (Cont. Spray)	~~GG~~	3
	193	Timers (Cont. Spray)	~~GG~~	3
	194	Water Level 8 (FW/TT) → move to RPS	~~GG~~	2
	195	Drywell Pressure (Supp. Pool Makeup System-SPMS)	~~GG~~	3
	196	Level 1 (SPMS)	~~GG~~	3
	197	Level 2 (SPMS)	~~GG~~	3
	198	Supp. Pool Level (SPMS)	~~GG~~	3
	199	Supp. Pool Makeup Timer (SPMS)	~~GG~~	3
	200	Manual Initiation (SPMS)	~~GG~~	3
3.3.10	201A	Neutron Flux Monitoring	~~GG~~	2
3.3.11	202	Degraded Voltage	H	3
3.4		REACTOR COOLANT SYSTEM		
3.4.1	203	Recirculation Loops	H,GG	2
	204	Jet Pumps	H,GG	3
	205	Idle Recirculation Loop Startup	H,GG	2
	206	Recirculation Loop Flow	GG	2

BWR/6 - FWP/TT non-safety for equip protect - has RPS scram on Level 8 for MCPP protect

BWR/4 - No level 8 scram - FWP/TT needed to get scram on CV/SV closure.

BWR-TABLE 1 (Continued)

LCO	REPORT ITEM		PLANT	CRITERIA
3.4.2	207	Safety/Relief Valves	H,GG	3
	208	S/RV Low-Low Set	H,GG	3
3.4.3	209	Leak Detection Systems	H,GG	1
3.4.3	210	Operational Leakage Limits	H,GG	1
3.4.5	212	Specific Activity	H,GG	2
3.4.6	213	Pressure/Temperature Limits		
	214	Reactor Steam Dome Pressure	H,GG	2
3.4.7	215	MSIVs	H,GG	3
3.4.9	217	RHR - Hot Shutdown	GG	Policy Statement
	218	RHR - Cold Shutdown	GG	Policy Statement
3.5		EMERGENCY CORE COOLING SYSTEMS		
3.5.1	219	HPCI	H	3
3.5.2	220	ADS	H	3
3.5.3	221	CSS	H	3
	222	LPCI	H	3
3.5.4	223	Supp. Pool	H,GG	3
	224	ECCS - Operating	GG	3
	225	ECCS - Shutdown	GG	3
3.6		CONTAINMENT SYSTEMS		
3.6.1		Primary Containment		
	226	Cont. Integrity	H,GG	3
	228	Air Locks	H,GG	3
	229	MSLIV-LCS	H,GG	3
	231	Structural Integrity	H,GG	3
	232	Cont. Internal Pressure	H,GG	2
	233	Cont. Air Temp	GG	2
	234	Containment Purge System	H,GG	3
3.6.2		Drywell		
	235	Drywell Integrity	H,GG	3
	236	Drywell Air Temperature	H,GG	2
	237	Drywell Bypass Leakage	GG	2
	238	Drywell Air Locks	GG	3
	239	Drywell Structural Integrity	GG	3
	240	Drywell Internal Pressure	GG	2
	241	Drywell Vent and Purge	GG	2

BWR-TABLE 1 (Continued)

LCO	REPORT ITEM		PLANT	CRITERIA
3.6.3		Depressurization Systems		
	242	Cont. Spray	GG	3
	243	Suppression Chamber (Pool)	H,GG	2 & 3
	244	Suppression Pool Makeup	GG	3
	245	Suppression Pool Cooling	H,GG	3
3.6.4	246	Isolation Valves	H,GG	3
3.6.5	247	Supp. Chamber - Drywell VB	H	3
	248	RB - Supp. Chamber VB	H	3
	249	Drywell Post LOCA VB	GG	3
3.6.6		Secondary Containment		
	250	Secondary Containment Integrity	H,GG	3
	251	Auto Isolation Dampers	H,GG	3
3.6.7		Containment Atmosphere Control		
	252	SGTS	H,GG	3
	253	H_2 Recombiner (Note 4)	H,GG	3
	254	H_2 Mixing System	H	3
	255	O_2 Conc.	H	3
	256	H_2 Ignition System	GG	3
3.7		PLANT SYSTEMS		
3.7.1	258	RHR Service Water	H	3
	259	Standby Service Water	GG	3
	260	Plant Service Water	H	3
	261	HPCS Service Water	GG	3
	262	Ultimate Heat Sink	GG	3
3.7.2	263	Control Room Environmental Control	H	3
	264	Control Room Emergency Filter	GG	3
3.7.3	265	RCIC Main Turbine Bypass (open)	H,GG H,GG	Policy Statement
3.8		ELECTRICAL POWER SYSTEMS		
3.8.1	274	Electrical Power Systems (AC/DC Sources, On-Site Distribution) (6 Sections)	H,GG	3
3.8.4	277	Power Monitoring of RPS	H,GG	3
	278	MOV Thermal Overload Protection	GG	3

BWR-TABLE 1 (Continued)

LCO	REPORT ITEM		PLANT	CRITERIA
3.9		REFUELING OPERATIONS		
3.9.1	279	Mode Switch	H,GG	3
	280	Instrumentation	H,GG	2
3.9.3	281	Control Rod Position	H,GG	2
3.9.4	282	Decay Time	H,GG	2
3.9.5	283	Secondary Cont. - Refueling Floor	H	3
	284	Secondary Cont. Isolation Dampers	H	3
	285	Standby Gas Treatment System	H	3
3.9.8	288	Crane Travel Spent Fuel Pool	H,GG	2
3.9.9	289	Water Level Reactor Vessel	H,GG	2
	290	Water Level Spent Fuel Pool	H,GG	2
	292	Coolant Circulation - High Water Level	H,GG	Policy Statement (R
	293	Low Water Level	GG	Policy Statement (R
3.11		RADIOACTIVE EFFLUENTS		
3.11.2	307	Main Condenser	H,GG	2

Notes:

1. LCOs for these systems should be retained in STS. The Policy Statement criteria should not be used to relocate specific trip functions, channels or instrument within these LCOs.

2. The staff is pursuing alternative approaches which would allow relocation of some of these LCOs on a schedule consistent with the schedule for development of the new STS. The staff is also initiating rulemaking to delete the requirement that RETS be included in Technical Specifications.

3. Because fires (either inside or outside the control room) can be a significant contributor to the core melt frequency and because the uncertainties with fire initiation frequency can be significant, the staff believes that this LCO should be retained in the STS at this time. The staff will consider relocation of Remote Shutdown Instrumentaiton on a plant-specific basis.

4. This LCO will be considered for relocation to a licensee-controlled document on a plant-specific basis.

BWR-TABLE 2 (Note 1)

GENERAL ELECTRIC STANDARD TECHNICAL SPECIFICATION
LCOs WHICH MAY BE RELOCATED

LCO	REPORT ITEM		PLANT
3.1		REACTIVITY CONTROL SYSTEMS	
3.1.2	2	Reactivity Anomaly (Note 2)	H,GG
3.1.3	4	Maximum Scram Times (7 Sec)	H
3.3		INSTRUMENTATION	
3.3.2		Isolation Actuation Instrumentation	
	75	Drywell Pressure - High (HPCI)	~~H~~
	84	Drywell Pressure - High (RCIC)	~~H~~,GG
3.3.6		Control Rod Withdrawal Block Instrumentation	
	135	APRM	~~H~~,GG
	137	SRM	~~H~~
	138	IRM	~~H~~,GG
	139	SDV Water Level	~~H~~,GG
	140	Reactor Coolant System Recirculation Flow-Upscale	GG
3.3.7		Monitoring Instrumentation	
	151	Seismic Monitors	~~H~~,GG
	152	Meteorological Inst.	GG
	183	TIP	~~H~~,GG
	184	Main Control Room Environmental System (Chlorine and Ammonia) Detection System	~~H~~
	186	Fire Protection	GG (H)
	187	Loose-Parts	GG (H)
	188	Radioactive Liquid Effluent (Note 3) Monitoring Instrumentation	~~H~~,GG
	189	Radioactive Gaseous Effluent (Note 3) Monitoring Instrumentation	~~H~~,GG
3.3.9	201	Turbine Overspeed Protection	~~H~~,GG
3.4		REACTOR COOLANT SYSTEM	
3.4.4	211	Chemistry	H,GG
3.4.8	216	Structural Integrity (Note 4)	H,GG
3.6		CONTAINMENT SYSTEMS	
3.6.1	227	Containment Leakage (Note 5)	H,GG

BWR-TABLE 2 (Continued)

LCO	REPORT ITEM		PLANT
3.6.2	230	Feedwater Leakage Control	GG
3.6.7	257	Combustible Gas Control Purge System	GG
3.7		PLANT SYSTEMS	
3.7.4	266	Snubbers	H,GG
3.7.5	267	Sealed Source Contamination	H,GG
3.7.6	268	Fire Suppression Systems (6 Sections)	GG
3.7.7	269	Fire Rated Assemblies	GG
3.7.8	270	Area Temp Monitoring [redacted]	GG
	271	Settlement of Class 1 Structure	H (plant specific)
3.7.9	272	Spent Fuel Pool Temp	GG
3.7.10	273	Flood Protection	H,GG
3.8		ELECTRICAL POWER SYSTEMS	
3.8.2	275	AC Circuits Inside Containment	H
3.8.3	276	Overcurrent Protection Devices	H,GG
3.9		REFUELING OPERATIONS	
3.9.6	286	Communications	H,GG
3.9.7	287	Refueling Equipment (3 Sections)	H,GG
3.9.10	291	Control Rod Removal (2 Sections)	H,GG
3.9.12	294	Horizontal Fuel Transfer System	GG
3.10	295	SPECIAL TEST EXCEPTIONS (Note 6)	H,GG
3.11		RADIOACTIVE EFFLUENTS (Note 3)	
3.11.1	296	Liquid Effluents	H,GG
	297	Liquid Effluents Dose	H,GG
	298	Liquid Waste Treatment	H,GG
	299	Liquid Holdup Tanks	H,GG
3.11.2	300	Gaseous Effluent Dose Rate	H,GG
	301	Gaseous Effluent Dose - Noble Gases	H,GG
	302	Gaseous Effluent Dose - Other than Noble Gas	H,GG
	303	Gaseous Radwaste Treatment	H,GG
	304	Total Dose	H,GG

BWR-TABLE 2 (Continued)

LCO	REPORT ITEM		PLANT
	305	Ventilation Exhaust Treatment System	GG
	306	Explosive Gas Mixture	H,GG
3.11.3	308	Solid Radwaste System	H,GG
3.12		RADIOLOGICAL ENVIRONMENTAL MONITORING (Note 3)	
	309	Environmental Monitoring (3 Sections)	H,GG

Notes:

1. LCOs listed in this table may be relocated to other licensee-controlled document contingent upon NRC staff approval of the location of and controls over relocated requirements.

2. This LCO may be removed from the STS. However, if the associated Surveillance Requirement(s) is necessary to meet the OPERABILITY requirements for a retained LCO, the Surveillance Requirement(s) should be relocated to the retained LCO.

3. The staff is pursuing alternative approaches which would allow relocation of some of these LCOs on a schedule consistent with the schedule for development of the new STS. The staff is also initiating rulemaking to delete the requirement that RETS be included in Technical Specifications.

4. This LCO may be relocated out of Technical Specification. However, the associated Surveillance Requirement(s) must be relocated to Technical Specificat Section 4.0, Surveillance Requirements.

5. This LCO may be relocated, however, Pa, La, Ld and Lt must be either retained in TS or in the Bases of the appropriate containment LCO.

6. Special Test Exceptions may be included with the corresponding LCOs.