Attachment A

1. Replace Technical Specification page 6.10-2 with the enclosed page.

changes shall also be periodically incorporated into the as-built file.

b. Records of new and irradiated fuel inventory, fuel transfers, and assembly burnup histories.

c. Records of plant radiation and contamination surveys.

d. Records of off-site environmental monitoring surveys.

e. Records of radiation exposure of all plant personnel, including all contractors and visitors to the plant who enter radiation control areas.

f. Records of radioactivity in liquid and gaseous material released to the environmental and radioactive waste shipments.

g. Records of transient or operational cycles for those facility components designed for limited number of transients or cycles.

h. Records of training and qualification for current station technical and operations staff members.

i. Records of in-service inspections peformed pursuant to these Technical Specifications.

j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR Section 50.59.

k. Records of meetings of the PORC and the NSARB.

l. Records of Quality Assurance activities as required by the QA Manual not listed in 6.10.1.

Attachment B

The proposed change will clarify a potential inconsistency in quality assurance records retention requirements. Technical Specification 6.10.1 specifies that certain records be retained for five years. Specification 6.10.2 specifies that certain other records must be retained for the duration of the plant license. One of the latter requirements in the existing specification covers Quality Assurance activities as required by the QA Manual. The two specifications may conflict for some records and, therefore, a revision has been proposed such that if a record has been specifically required to be retained for 5 years, it need not be retained for the life of the license just because it records a quality assurance activity required by the QA Manual.

The proposed change has been requested by the NRC and is submitted only to eliminate potential inconsistencies. Records not specifically determined by specification 6.10.1 to be necessary for only five years will be retained for the duration of the license. Therefore, no records may be destroyed that have not been evaluated as required for only five years.

In accordance with 10 CFR 50.91, the proposed change to the Technical Specifications has been evaluated against three criteria to determine if the operation of the facility in accordance with the proposed amendment would:

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

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

3. involve a significant reduction in a margin of safety.

The proposed change will not have an adverse impact as judged against these criteria.

The proposed Technical Specification change conforms to regulatory guidance and meets the Commission's example (i) of amendments that do not involve a significant hazards consideration because it is a purely administrative change to achieve consistency in the Technical Specifications. The proposed amendment does not involve any irreversible consequences.

Therefore, there is no undue risk to public health and safety and a finding of no significant hazards is warranted for the proposed Technical Specification change.