

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SUBJECT: Requests amend to TS, revising "Rev A," including changes in Vol 7. Proposed rev does not change conclusion of NHSC or Environ Assessment provided in Rev A.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 68 + 600  
TITLE: OR Submittal: General Distribution

**NOTES:**

RECIPIENT	COPIES	
ID CODE/NAME	LTTR	ENCL
<del>PD4-2-LA</del>	<del>1</del>	<del>1</del>
COLBURN, T	1	1

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD4-2 PD	

INTERNAL: ACRS	1	1
NRR/DE/EMCB	1	1
NRR/DSSA/SPLB	1	1
NUDQCS-ABSTRACT	1	1

FILE CENTER 01	1	1
NRR/DRCH/HICB	1	1
NRR/DSSA/SRXB	1	1
OGC/HDS3	1	0

EXTERNAL: NOAC	1	1	NRC PDR	1	1
----------------	---	---	---------	---	---

NOTE TO ALL "RIDS" RECIPIENTS:  
PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,  
ROOM OWFN 5D-5 (EXT. 415-2083) TO ELIMINATE YOUR NAME FROM  
DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 13 ENCL 12





WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

July 9, 1996  
GO2-96-132

Docket No. 50-397

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21  
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

- References:
- 1) Letter GO2-95-265, dated December 8, 1995, JV Parrish (SS) to NRC, "Request for Amendment to Technical Specifications"
  - 2) Letter GI2-96-125, dated May 8, 1996, JW Clifford (NRC) to JV Parrish (SS), "Issuance of Amendment for the Washington Public Power Supply System Nuclear Project No. 2 (TAC No. M94573)"
  - 3) Letter GI2-96-113, dated April 30, 1996, JW Clifford (NRC) to JV Parrish (SS), "Conversion to Improved Technical Specifications (ITS) - Washington Public Power Supply System Nuclear Project No. 2 (WNP-2) (TAC No. M94226)"
  - 4) Letter GO2-95-076, dated April 25, 1995, JV Parrish (SS) to NRC, "Request for Amendment to Technical Specification 3/4.3.2, 'Isolation Actuation Instrumentation'"
  - 5) Letter GO2-96-080, dated April 22, 1996, JV Parrish (SS) to NRC, "Request for Amendment to Technical Specifications Section 6.0 Administrative Controls - Supplemental Information"

Limited Distribution  
Ltr. Encl.  
File Ctr 01 / /  
PM / /  
NOAC / /  
NRC PDR / /

A001  
1/1

9607120004 960705  
PDR ADOCK 05000397  
P PDR

## REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

In Reference 1, the Supply System proposed an overall conversion of the WNP-2 current Technical Specifications (CTS) to Improved Technical Specifications (ITS), based upon NUREG-1434, Revision 1, "Standard Technical Specifications, General Electric Plants, BWR/6," (STS). This letter proposes a revision to the amendment request "Revision A," originally submitted in Reference 1. The request for amendment to the WNP-2 Technical Specifications and Operating License is submitted in accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101. Volume 7 of the amendment request contains the No Significant Hazards Considerations. Although Revision B includes changes in Volume 7, the Supply System has determined that the proposed revision does not change the conclusion of the No Significant Hazards Considerations or the Environmental Assessment provided in Revision A.

Revision B includes numerous changes to Revision A. Responses to many of the staff review comments have been incorporated. Enclosure 1 lists these changes. Enclosure 2 contains page insert and removal instructions to facilitate updating Revision A. Revision B is Attachment 1 to this letter.

Reference 1 proposed increasing the surveillance frequency interval from 18 months to 24 months for several surveillance requirements. In response to the staff's request for additional information, Attachment 2 describes the surveillance interval extension evaluation.

Reference 1 identified three open items. The first concerned Supply System License Condition 2.C(16), Attachment 2, Item 3(b) regarding post accident monitoring neutron flux instrumentation and a planned request to amend the License Condition. The request has not yet been submitted for staff review. The License Condition will be maintained until the change is approved by the staff. The Supply System does not plan to incorporate the neutron flux monitoring instrumentation into the ITS submittal.

The second issue involved a planned submittal of the methodology to be used to develop the reactor pressure vessel pressure temperature limits. Revision A referenced the proposed Pressure Temperature Limits Report (PTLR). The methodology has not yet been submitted. ITS Revision C will therefore include the limits in the Technical Specifications and delete references to the PTLR.

A third change to Revision A would incorporate Cycle 12 specific changes. Changes to the current Technical Specifications for Cycle 12 have been approved by the staff and will be incorporated into ITS Revision C.

## REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Reference 2 approved the use of Option B to the Appendix J testing requirements. This change has been incorporated into ITS Revision B.

In Revision A, the Supply System proposed relocating information in the current Technical Specifications to plant controlled documents, with changes to the documents controlled in accordance with 10 CFR 50.59. Revision C will identify the specific licensee controlled documents. At the request of the staff, the relocated items and the proposed location are listed in Enclosure 3.

The Supply System also proposed relocating information to plant procedures and committed that changes to the procedures would be controlled in accordance with 10 CFR 50.59. In discussions with the staff, Mr. T.V. Wambach expressed that changes to plant procedures are not necessarily subject to the requirements of 10 CFR 50.59. Enclosure 4 provides the FSAR reference for those Technical Specification requirements to be relocated to procedures. This provides assurance that 10 CFR 50.59 will control future changes to the procedures. Specific requirements relocated to plant procedures will be tracked as regulatory commitments that can only be changed in accordance with 10 CFR 50.59.

Reference 1 also indicates requirements that are to be relocated to the WNP-2 Licensee Controlled Specifications (LCS) Manual. Chapter 1 of the LCS contains the Requirements for Operability (RFO), similar to the Limiting Conditions for Operations (LCO) in the Technical Specifications. Chapter 1 also contains equipment requirements, appropriate compensatory actions, and test requirements. The staff has indicated that prior to approving the relocation of requirements to the LCS from the CTS, the LCS must be incorporated into the FSAR. The Supply System will incorporate Chapter 1 of the LCS into the FSAR, by reference. Necessary changes will be made in Revision C to clarify this commitment.

In Reference 3, the staff acknowledged receipt of the change request and indicated that 41 issues were changes that could not be justified on the basis of the improved STS content. The Supply System does not agree that all of the 41 open items are beyond the scope of the conversion process. However, the staff has indicated that most of the 41 items will be reviewed by the staff in support of the ITS conversion. The Supply System appreciates the staff's consideration of these issues. Therefore, the request for the extension of allowed outage times (AOTs) discussed in Items 13, 26, 28 and part of Item 20 will be withdrawn from the ITS conversion in Revision C.

## REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

There are two pending license amendment requests under staff review. In Reference 4, the Supply System requested the addition of a containment isolation function to the WNP-2 Technical Specifications. Reference 1 categorized the change as a more restrictive requirement. The requirement will be maintained in the LCS until the amendment approval is received. If the staff approves the ITS amendment prior to approving the referenced request, the appropriate ITS pages will be submitted as a supplement to Reference 4. Reference 5 requested a change to Section 6.0 of the current Technical Specifications. Changes not incorporated into Reference 1 will be added to ITS Revision C.

In summary, Revision B incorporates changes identified by the staff and the Supply System. Not all review comments have been resolved. Revision C will incorporate additional changes generated from the comment resolution. Revision C will also:

- Remove reference to the PTLR and add the limits to ITS;

- Include changes necessary to support addition of the adjustable speed drives and removal of the flow control valves from the reactor recirculation system;

- Withdraw the request to extend various AOTs for ECCS and DG systems (Items 13, 20, 26, and 28);

- Include additional Technical Specification Administration Section changes (Reference 5);

- Revise the DOCs to indicate specific licensee controlled documents for relocated information.

A meeting was held with the staff on June 27 to discuss the ITS submittal. Revision B was completed prior to the meeting and does not address the agreements reached during the meeting. Revision C completion schedule will be established following resolution of the issues discussed at the meeting. The Supply System understands that the completion of the SER for the WNP-2 ITS submittal is tied to the resolution of all open issues and will expedite the submittal of any ITS revisions needed to support the staff review schedule.

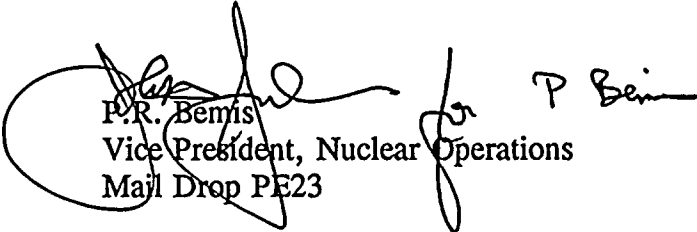
This Technical Specification amendment request has been approved by the Plant Operations Committee and the Corporate Nuclear Safety Review Board. In accordance with 10 CFR 50.91, the State of Washington has also been provided a copy of this letter.

Page 5

**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Should you have any questions or desire additional information regarding this matter, please call me or LC Fernandez at (509) 377-4147.

Respectfully,

  
P.R. Bemis  
Vice President, Nuclear Operations  
Mail Drop PE23

MGE

**Attachments**

1. Revision B of the ITS submittal
2. Evaluation of the 24 month surveillance interval

**Enclosures**

1. Revision B summary of changes
2. Page insert and remove instructions
3. Relocated items and proposed locations
4. FSAR reference for relocated items

cc: LJ Callan - NRC RIV  
KE Perkins, Jr. - NRC RIV, WCFO  
NS Reynolds - Winston & Strawn (w/o)  
NRC Sr. Resident Inspector - 927N

TG Colburn - NRR  
FS Adair - EFSEC  
DL Williams - BPA/399 (w/o)



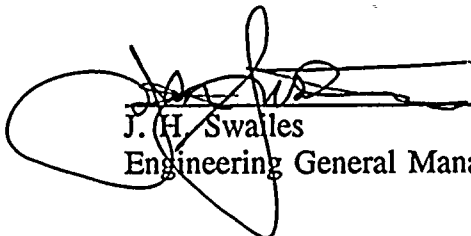


STATE OF WASHINGTON )  
 )  
COUNTY OF BENTON )

Subject: Amendment to Technical Specifications

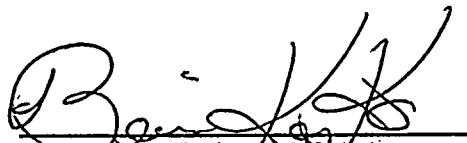
I, J. H. SWAILES, being duly sworn, subscribe to and say that I am the Engineering General Manager for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

DATE July 9, 1996

  
J. H. Swalles  
Engineering General Manager

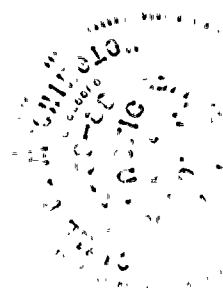
On this date personally appeared before me J. H. SWAILES, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 9 day of July 1996.

  
Notary Public in and for the  
STATE OF WASHINGTON



Residing at Kennecook WA  
My Commission Expires 4/28/98



# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 1 of 22

## REVISION B SUMMARY OF CHANGES

This enclosure was prepared to provide a brief summary of the changes in Revision B. The original Technical Specification amendment request was submitted to the NRC on December 8, 1995. The amendment request proposed the overall conversion of the current Washington Nuclear Plant Unit 2 (WNP-2) Technical Specifications, as described in NUREG-1433, Revision 1 and NUREG-1434, Revision 1, "Standard Technical Specifications, General Electric Plants, BWR/4 and BWR/6," respectively.

Revision B to this amendment request results from the incorporation of NRC review comments, as well as certain generic Technical Specification Task Force changes and editorial changes. The order in which summary of the changes are listed is of no significance. Replacement pages have been provided for each of the pages affected by Revision B changes. Page insert and removal instructions have also been provided to facilitate updating the amendment request to include Revision B.

## SUMMARY OF CHANGES

1. Application of Selection Criteria, Attachment page 8

Revised the Basis for inclusion has been provided for CTS 3/4.4.1.4, Idle Recirculation Loop Startup. This basis is consistent with the Bases for proposed LCO 3.4.12.

2. Application of Selection Criteria, Appendix A, pages 1 and 2 of 28

Updated LCO Statements have been provided to reflect the LCO Statements modified by a recent amendment.

3. Specification 3.3.8.2, RPS Electric Power Monitoring, LCO 3.3.8.2 and Conditions A and B, pages 3.3-71 and B 3.3-214

In MODES 4 and 5, the RPS Electric Power Monitoring assemblies are required to support the instrumentation that provides an isolation signal to the RHR SDC suction isolation valves. The instrumentation is listed in proposed LCO 3.3.6.1, and only one of the two trip systems is required when RHR SDC System integrity is maintained (Note d to Table 3.3.6.1-1). This LCO requires two RPS Electric Power Monitoring assemblies to be OPERABLE for each inservice RPS power supply. However, only one RPS power supply is needed to support the required instrumentation, provided the RHR SDC System integrity is maintained. Currently, this LCO requires RPS Electric Power Monitoring assemblies to be OPERABLE on an inservice RPS power supply (which is normally maintained inservice at all times), even when no equipment is required to be OPERABLE. Therefore, the words "that support equipment required to be OPERABLE" have been added. This will allow the RPS Electric Power Monitoring assemblies on one of the two RPS power supplies to be inoperable when no required equipment is being

2 2

1

C

2

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 2 of 22

## REVISION B SUMMARY OF CHANGES

### 3. (continued)

powered from the associated RPS power supply. In addition, the word "required" has been added to Conditions A and B for consistency with the Writer's Guide, since, based on the above described change, all RPS Electric Power Monitoring assemblies may not be required OPERABLE at all times.

Corresponding changes have also been made to the CTS markup for Specification 3.3.8.2, page 1 of 1, to the Discussion of Changes L.1 for ITS 3.3.8.2 (page 2), to the NUREG-1434 ITS markup, page 3.3-83, to the Justification for Deviations to Section 3.3, comment number 43 (page 7), and the NUREG-1434 Bases markup, page B 3.3-241.

### 4. Specification 3.3.8.2, RPS Electric Power Monitoring, Applicability and ACTIONS C and D, pages 3.3-71, 3.3-72, B 3.3-215, B 3.3-217, and B 3.3-218, and Specification 3.10.4, Single Control Rod Withdrawal—Cold Shutdown, LCO 3.10.4.c, pages 3.10-9 and B 3.10-16

The MODE 4 and 5 Applicability of proposed LCO 3.3.8.2, for control rod withdrawal, is revised to delete MODE 4, consistent with the Applicability of RPS Functions in proposed LCO 3.3.1.1. In MODE 4, a control rod may be withdrawn from a core cell containing one or more fuel assemblies in accordance with proposed LCO 3.10.4. Therefore, LCO 3.10.4 includes OPERABILITY requirements for RPS Functions and control rods (LCO 3.9.5). As a result, LCO 3.10.4 has been modified to also include requirements for the RPS Electric Power Monitoring assemblies to be OPERABLE when the RPS Functions and control rods are required to be OPERABLE. Commensurate changes to the ACTIONS of LCO 3.3.8.2 have also been made for consistency.

The current ACTION D has been split into two separate ACTIONS, one for when the RHR SDC suction isolation valves are open and the other for when a control rod is withdrawn. This provides separate and discrete ACTIONS for the two separate Applicabilities (MODE 4 and 5 with both RHR SDC suction isolation valves open and MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies). This wording is also consistent with a change requested by the NRC reviewer in the comment to section 3.3, comment 97.

Corresponding changes have also been made to the CTS markup for Specification 3.3.8.2, page 1 of 1, to the Discussion of Changes M.1 for ITS 3.3.8.2 (page 1), to the Discussion of Changes L.2 for ITS 3.10.4 (pages 3 and 4), to the NUREG-1434 ITS markup, pages 3.3-83 and 3.3-84, to the Justification for Deviations to Section 3.3, comment number 44 (page 7), to the NUREG-1434 ITS markup, page 3.10-9, to the Justification for Deviations to Section 3.10, comment number 9 (page 1), and the NUREG-1434 Bases markup, pages B 3.3-242, B 3.3-244, B 3.3-245, and B 3.10-18.



# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 3 of 22

## REVISION B SUMMARY OF CHANGES

5. Specification 3.3.6.1, Primary Containment Isolation Instrumentation, Table 3.3.6.1-1, Function 1.d, page 3.3-55

The Allowable Value units for this Function has been changed from inches mercury gauge absolute pressure to inches mercury gauge vacuum. The actual Allowable Value has not changed from the previous submittal, however, the change has been appropriately classified from a less restrictive change to a more restrictive change.

Corresponding changes have also been made to the CTS markup for Specification 3.3.6.1, page 7 of 12, to the Discussion of Changes M.6 for ITS 3.3.6.1 (page 5), and to the NUREG-1434 ITS markup, page 3.3-56.

6. Specification 3.1.5, Control Rod Scram Accumulators, Required Action C.1, page 3.1-19

The Required Action has been modified to be consistent with the words of Required Action C.2. It is not necessary to state the control rod is associated with the inoperable accumulator, since Condition C states it is for an inoperable accumulator. The proposed words are also consistent with Required Action C.2.

Corresponding changes have also been made to the NUREG-1434 ITS markup, page 3.1-17.

7. Specification 5.7, High Radiation Area, pages 5.0-23, 5.0-24, 5.0-25, and 5.0-26

The Specification has been modified for consistency with the most recent NEI guidelines concerning the draft NRC Generic Letter. The changes are essentially clarifications or editorial in nature.

Corresponding changes have also been made to the NUREG-1434 ITS markup, pages 5.0-24a, 5.0-24b, 5.0-25a, and 5.0-25b.

8. Specification 2.2, Safety Limits Violations, pages 2.0-1, 2.0-2, B 2.0-5, B 2.0-6, B 2.0-8, B 2.0-9, and B 2.0-10

The Specification has been modified for consistency with Technical Specification Task Force change number 5 (TSTF-05). The proposed change deletes requirements from the Technical Specifications that are duplicative of or contained in other regulations (10 CFR 50.36).

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 4 of 22

## REVISION B SUMMARY OF CHANGES

### 8. (continued)

Corresponding changes have also been made to the CTS markup for Chapter 2.0, pages 1 of 6, 2 of 6, 3 of 6, 4 of 6, 5 of 6, and 6 of 6, to the Discussion of Changes A.2, M.3, M.4, LA.1, and LA.2 to ITS Chapter 2.0 (pages 1 and 2), to the CTS markup for current Specification 6.7 (in Chapter 5.0), page 1 of 1, to the Discussion of Changes A.1 and LA.1 to CTS 6.7 (page 1), to the NUREG-1434 ITS markup, pages 2.0-1 and 2.0-2, to the Justification for Deviations to Chapter 2.0, comment number 2 (page 1), to the NUREG-1434 Bases markup, pages B 2.0-6, B 2.0-7, B 2.0-9, B 2.0-10, and B 2.0-11, and to the Justification for Deviations to Bases Chapter 2.0, comment number 8 (page 1).

### 9. Specification 5.5.9, Diesel Fuel Oil Testing Program, page 5.0-15

An allowance for the applicability of the provisions of SR 3.0.2 and SR 3.0.3 has been added to the Diesel Fuel Oil Testing Program, consistent with the current licensing basis. This program is currently in the surveillances of CTS 3/4.8.1.1. As such, the provisions of CTS 4.0.2 (proposed SR 3.0.2) and CTS 4.0.3 (proposed SR 3.0.3) are already applicable. This change maintains the current provisions.

Corresponding changes have also been made to the CTS markup for Specification 5.5, page 17 of 17, to the Discussion of Changes A.11 to ITS 5.5 (page 2), and to the NUREG-1434 ITS markup, page 5.0-15.

### 10. Bases 3.3.8.1, LOP Instrumentation, page B 3.3-210

A Bases discussion has been provided for Required Actions B.2.1 and B.2.2, which were added in Revision A. The discussion describes the purpose of the two Required Actions and why they only affect Functions 1.c and 1.d.

Corresponding changes have also been made to the NUREG-1434 Bases markup, page B 3.3-237.

### 11. Bases 3.6.1.5, RHR Drywell Spray, page B 3.6-32 and B 3.6-33

The Bases discussion of the RHR Drywell Spray System has been modified to delete the requirement for the heat exchanger to be OPERABLE. The WNP-2 safety analysis does not assume the cooling function of the heat exchanger is functional, only the flow path is needed. Since the flow path is already covered by the words "associated piping," the specific reference to the heat exchanger is not needed.

Corresponding changes have also been made to the NUREG-1434 Bases markup, pages B 3.6-43 and B 3.6-44.





3-1

4-4

6

2

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 5 of 22

## REVISION B SUMMARY OF CHANGES

12. Bases 3.4.10, RHR Shutdown Cooling System—Hot Shutdown, page B 3.4-51, and Bases 3.4.11, RHR Shutdown Cooling System—Cold Shutdown, page B 3.4-55

The Bases for both of these Specifications have been modified to delete reference to the Fuel Pool Cooling System as a means to cool down the plant. Fuel Pool Cooling can only be used in MODE 5. For MODE 3 operation, a substitute method to cool down the plant (the Condensate and Main Steam Systems) has been provided.

Corresponding changes have also been made to the NUREG-1434 Bases markup, pages B 3.4-45 and B 3.4-50.

13. Bases 3.4.6, RCS Operational LEAKAGE, page B 3.4-31

The names of the systems used to monitor unidentified LEAKAGE have been changed to correspond with the plant specific names used in Specification 3.4.8.

Corresponding changes have been made to the NUREG-1434 Bases markup, page B 3.4-24.

14. Bases 3.3.1.1, RPS Instrumentation, page B 3.3-4

The description of when the RPS Functions are required to be OPERABLE and why have been modified for consistency with the LCO requirements and recently licensed BWR (Peach Bottom) terminology.

Corresponding changes have also been made to the NUREG-1434 Bases markup, page B 3.3-4.

15. CTS markup for Specification 3.6.4.1, page 1 of 1, and Discussion of Changes LA.1 to ITS 3.6.4.1 (pages 1 and 2)

The CTS markup for CTS 4.6.5.1.b.1 shows that this requirement is covered by proposed SR 3.6.4.1.2. However, neither NUREG-1434 SR 3.6.4.1.2 or proposed SR 3.6.4.1.2 requires the blowout panels to be verified closed and sealed every 31 days, as is currently required by CTS 4.6.5.1.b.1. Therefore, a new Discussion of Change, LA.1, has been provided to discuss the relocation of this requirement to plant procedures.

16. Discussion of Changes L.8 to ITS 3.3.1.1 (page 11)

The first sentence of the Discussion of Change has been clarified to identify the proposed source of the requirement, as requested in the NRC review comments to Section 3.3 (comment 22).

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 6 of 22

## REVISION B SUMMARY OF CHANGES

17. Discussion of Changes A.5 and R.1 to ITS 3.3.3.1 (page 2)

The Discussion of Change A.5 has been modified to justify the addition of proposed ACTION D. The Discussion of Change R.1 has been modified to state that neutron flux monitors, which were previously classified as a Type A variable, are no longer classified as a Type A variable in accordance with NEDO-31588. These two changes were requested in the NRC review comments to Section 3.3 (comment 38 and 39).

18. Discussion of Changes L.3 to ITS 3.3.4.1 (page 4)

The Discussion of Change has been modified to clarify which CTS ACTIONS are being modified. This change was requested in the NRC review comments to Section 3.3 (comment 53).

19. CTS markup for Specification 3.3.6.1, page 6 of 12, and Discussion of Changes A.13 to ITS 3.3.6.1 (page 3)

The word "stop" in footnote \* of the CTS markup has been changed to "throttle," consistent with the change made in the CTS markup to Specification 3.3.1.1. A new Discussion of Change, A.13, has been provided, consistent with the same Discussion of Change in ITS 3.3.1.1 (A.13). This change was requested in the NRC review comments to Section 3.3 (comment 71).

20. CTS markup for Specification 3.3.6.2, page 4 of 8

The words "CORE ALTERATIONS and" in the footnote # have been deleted using the Discussion of Change L.3. The Discussion of Change is currently only identified on the footnote # to CTS Table 4.3.2-1. It should also be identified on footnote # to CTS Table 3.3.2-1.

21. CTS markup for Specification 3.7.3, page 1 of 3

The location of the added proposed ACTION D has been changed for clarity. This change was requested in the NRC review comments to Section 3.7 (comment 102).

22. CTS markup for Specification 3.6.1.8, page 1 of 1, and Discussion of Changes LD.1 to ITS 3.6.1.8 (page 2)

The change requesting an extension of the system functional test (CTS 4.6.1.4.c) from 18 months to 24 months is being withdrawn. The system functional test will remain at 18 months. The Discussion of Change requesting this extension has also been deleted.



५३

14

1

1

2

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 7 of 22

## REVISION B SUMMARY OF CHANGES

23. Discussion of Changes LF.1 to ITS 3.3.1.1 (page 7), Discussion of Changes LE.1 to ITS 3.3.2.2 (page 7), Discussion of Changes LE.1 to ITS 3.3.3.1 (page 7), Discussion of Changes LF.1 to ITS 3.3.4.2 (page 3), Discussion of Changes LF.1 and L.4 to ITS 3.3.5.1 (pages 6 and 8), Discussion of Changes LF.1 to ITS 3.3.5.2 (page 4), Discussion of Changes LE.1 and LF.1 to ITS 3.3.6.1 (pages 12 and 13), Discussion of Changes LF.1 to ITS 3.3.6.2 (page 5), Discussion of Changes LF.1 to ITS 3.3.8.1 (pages 4 and 5), and Discussion of Changes LF.1 to ITS 3.3.8.2 (page 2)

The description of the methodology used to determine the proper Allowable Value (LF.1 changes) for the affected instrumentation Functions has been changed from the 1994 version of the ISA methodology to the 1982 ISA methodology. In addition, for the CHANNEL CALIBRATION Frequency extensions (LE.1 changes), the proper title for the 1982 ISA methodology has been provided. This is the correct methodology WNP-2 has used and this methodology has been approved for use by the NRC, as described in RG 1.105, Revision 2, February 1986 (as stated in all the LE.1 and LF.1 changes).

24. Technical Specifications, Bases, CTS markups and Discussion of Changes, NUREG ITS markup and Justification for Deviations, and NUREG Bases markup and Justification for Deviations

The following changes are proposed to Chapter 1.0 and Sections 3.3 and 3.7 as requested by the NRC reviewer during phone conversations with WNP-2 personnel to resolve NRC reviewer comments/questions:

(Comment 14) Specification 3.3.1.1, SR 3.3.1.1.7 Frequency, page 3.3-5; and Bases 3.3.1.1, SR 3.3.1.1.7, page B 3.3-27; CTS markup for Specification 3.3.1.1, page 8 of 11; Discussion of Changes A.10 to ITS 3.3.1.1 (page 3); NUREG ITS markup, SR 3.3.1.1.7, page 3.3-4; and NUREG Bases markup SR 3.3.1.1.7, page B 3.3-28;

(Comment 21) Discussion of Changes LA.5 to ITS 3.3.1.1 (page 5);

(Comment 24) Discussion of Changes L.10 to ITS 3.3.1.1 (page 11);

(Comment 25) Discussion of Changes M.1 to ITS 3.3.1.1 (page 4);

(Comment 29) Discussion of Changes LA.2 to ITS 3.3.2.1 (page 2);

(comment 33) Discussion of Changes L.3 to ITS 3.3.2.1 (page 3);

(Comment 45) Justification for Deviations to Section 3.3, comment number 18 (page 3);



# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 8 of 22

## REVISION B SUMMARY OF CHANGES

### 24. (continued)

(Comment 46) Discussion of Changes A.2 to ITS 3.3.3.2 (page 1);

(Comments 54 & 55) CTS markup for Specification 3.3.4.2, pages 1 of 4 and 3 of 4, Discussion of Changes M.1 and L.1 to ITS 3.3.4.2 (page 1 and 3), and NSHE for ITS 3.3.4.2, L.1, page 1;

(Comment 58) Section 1.1, Definition of MFLPD, page 1.1-5, Bases 3.2.4, LCO Section, page B 3.2-15, CTS markup for Chapter 1.0, page 7 of 19, NUREG ITS markup, pages 1.1-2, 1.1-3, and 1.1-5, Justification for Deviations to Chapter 1.0, comment numbers 7 and 10, and NUREG Bases markup, page B 3.2-15;

(Comments 85, 86 and 87) Discussion of Changes M.4, L.2, and L.3 to ITS 3.3.7.1 (pages 2 and 4);

(Comment 88) CTS markup for Specification 3.3.7.1, pages 2 of 4, 2 of 4, and 4 of 4, and Discussion of Changes A.4, A.5, and L.1 to ITS 3.3.7.1 (pages 1 and 3);

(Comment 101) Discussion of Changes A.1 to ITS 3.7.3 (page 1);

(Comment 115) CTS Markup for Specification 3.3.8.1, pages 3 of 5 and 4 of 5, Discussion of Changes A.5, A.6, and L.3 to ITS 3.3.8.1 (pages 1 and 6), and NSHE for ITS 3.3.8.2, page 3; and

(Comment 118) Discussion of Changes A.1 to ITS 3.7.7 (page 1).

### 25. Discussion of Changes L.1 to ITS 3.10.8 (page 2) and NSHE for ITS 3.10.8, L.1, page 1

The Discussion of Change and NSHE were modified to state that SR 3.0.1 will ensure that Surveillances are met prior to entry into the Applicability of the LCO (MODE 5). If the SR is not performed prior to entering the Applicability, as soon as the test commences, SR 3.0.1 would require the LCO to be declared not met. This would require immediate action be taken to suspend the test as started in the ACTIONS of ITS 3.10.8. Therefore, SR 3.0.1 precludes the test from being performed if the SR is not current. This change was requested by the NRC reviewer to resolve Section 3.10, comment 5.

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 9 of 22

## REVISION B SUMMARY OF CHANGES

26. Specification 3.4.1, Recirculation Loops Operating, SR 3.4.1.1, page 3.4-3 and B 3.4-9

The SR is being changed to verify recirculation loop drive flow mismatch, instead of the NUREG recirculation loop jet pump flow mismatch. Currently, WNP-2 verifies recirculation loop drive flow. The installed instrumentation provide this indication rather than recirculation loop jet pump flow. The two methods essentially determine the same ratio, therefore, they are considered equivalent methods in determining flow mismatch. This change is related to the NRC reviewer comment to Section 3.4 (comment 1).

Corresponding changes have also been made to NUREG-1434 ITS markup, page 3.4-2, and to NUREG-1434 Bases markup, page B 3.4-5.

27. Specification 3.4.7, RCS PIV Leakage, Required Action Note, pages 3.4-13 and B 3.4-37

The note has been modified to only apply to check valves, consistent with CTS. This note was inadvertently applied to all valves, as noted in the NRC review comments to Section 3.4, comment 4.

Corresponding changes have also been made to NUREG-1434 ITS markup, page 3.4-11, to the Justification for Deviations to Section 3.4, comment number 11 (page 2), and to the NUREG-1434 Bases markup, page B 3.4-30.

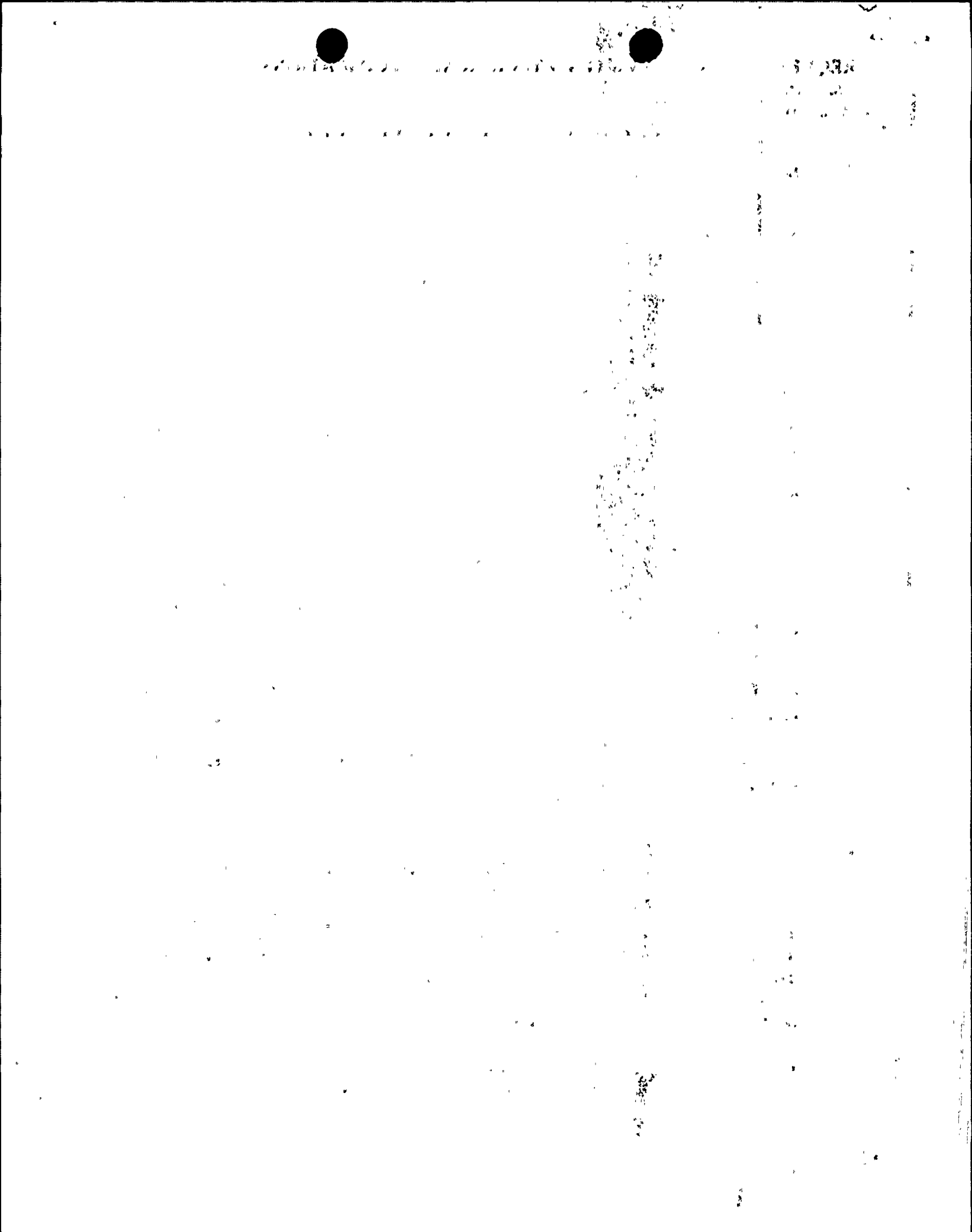
28. Discussion of Changes L.1 to ITS 3.9.1 (page 2), Discussion of Changes L.3 and L.4 to ITS 3.9.2 (page 2), Discussion of Changes L.2 to ITS 3.9.3 (pages 1 and 2), Discussion of Changes L.1 to ITS 3.9.6 (page 1), Discussion of Changes L.2 to ITS 3.9.7 (page 2), NSHE for ITS 3.9.1, L.1, page 1, NSHE for ITS 3.9.2, L.3 and L.4, pages 4 and 5, NSHE for ITS 3.9.3, L.2, page 2, NSHE for ITS 3.9.6, L.1, page 1, and NSHE for ITS 3.9.7, L.2, page 2

The Discussion of Changes and NSHE were modified to state that SR 3.0.1 will ensure the applicable Surveillance is met prior to entry into the Applicability of the LCO. If the SR is not performed prior to entering the Applicability, as soon as the LCO's Applicability is entered, SR 3.0.1 would require the LCO to be declared not met. This would require immediate action be taken to exit the Applicability of the LCO, as stated in the individual LCO's ACTIONS. Therefore, SR 3.0.1 precludes the associated LCO's Applicability from being entered if the SR is not current. This change was requested by the NRC reviewer to resolve Section 3.9, comment 1.

29. Discussion of Changes L.1 to ITS 3.9.4 (page 2)

The Discussion of Change was clarified to justify the deletion of the three current surveillances. This change was requested by the NRC reviewer to resolve Section 3.9, comment 2.





# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 10 of 22

## REVISION B SUMMARY OF CHANGES

30. Discussion of Changes LA.1 to ITS 5.4 (pages 1 and 2) and Discussion of Changes LA.1 to CTS 6.10 (page 1)

The Discussion of Changes have been revised to relocate the details to the Quality Assurance Program and control any changes in accordance with 10 CFR 50.54(a). These changes were requested by the NRC reviewer to resolve Chapter 5.0, comments 1 and 7.

31. Justification for Deviations to Chapter 5.0, comment number 20 (page 3)

Justification has been provided for deletion of the prefilter pressure drop test from the NUREG. Currently, WNP-2 does not require this test and it was not added to the WNP-2 ITS. This change was requested by the NRC reviewer to resolve Chapter 5.0, comment 5.

32. NUREG-1434 ITS markup, page 3.4-26, Justification for Deviations to Section 3.4, comment number 16 (page 2), and NUREG-1434 Bases markup, page 3.4-58

The Justification for Deviation to NUREG ITS SR 3.4.11.3 and SR 3.4.11.4 was annotated by TSTF-35. Since this TSTF-35 change has not yet been approved, a plant specific justification, consistent with the justification provided in TSTF-35, has been added. This change was requested by the NRC reviewer to resolve Section 3.4, comment 8.

33. CTS markup for Specification 3.5.2, pages 3 of 5, 4 of 5, and 5 of 5, and Discussion of Changes A.6, A.7, A.8, and L.4 to ITS 3.5.2 (pages 2, 3, and 5)

The Discussion of Change A.6 has been incorporated into Discussion of Change L.4. Discussion of Changes A.7 and A.8 have been renumbered A.6 and A.7. This change was made at the request of the NRC reviewer during a phone conference resolving Section 3.5 comments.

34. Specification 3.9.1, LCO and Applicability, Pages 3.9-1, 3.9-2, and B 3.9-3

The current wording of LCO 3.9.1 and the associated Applicability could imply that all the refueling equipment interlocks are required at all times during in-vessel fuel movement. The Current Licensing Basis only requires the interlocks associated with the mode switch refuel position. Interlock associated with other positions of the reactor mode switch are not required when the reactor mode switch is in the refuel position, not when it is in the shutdown position. Therefore, to avoid confusion, the LCO and Applicability have been modified to state that the refueling interlocks are those associated with the mode switch refuel position, and that it is applicable when the reactor mode switch is in the refuel position. It is the belief of the Supply System that this is consistent with the intent of the NUREG.



100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

100-100000

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 11 of 22

## REVISION B SUMMARY OF CHANGES

34. (continued)

Corresponding changes have also been made to the NUREG-1434 ITS markup, page 3.9-1, to the Justification for Deviations to Section 3.9, comment number 7 (page 1), and to the NUREG-1434 Bases markup, pages B 3.9-2 and B 3.9-3.

35. Specification 3.3.3.2, SR 3.3.3.2.2 and SR 3.3.3.2.3, pages 3.3-28 and B 3.3-75

The Frequency of the CHANNEL CALIBRATION for the suppression pool water level instrumentation channel has been extended from 18 months to 24 months, consistent with the guidance of GL 91-04. The sensor for this instrument is common to the Post Accident Monitoring suppression pool water level instrumentation channel. The Post Accident Monitoring suppression pool water level instrumentation calibration extension was proposed in the original ITS submittal (see Discussion of Changes LE.1 to ITS 3.3.3.1). Because the loop (other than this Remote Shutdown Panel) is required to be calibrated every 24 months, this change justifies the 24 month frequency for the Remote Shutdown Panel portion of the loop. This change modifies SR 3.3.3.2.2 (the CHANNEL CALIBRATION at an 18 month Frequency) to exclude the suppression pool water level instrumentation channel, adds a new 24 month CHANNEL CALIBRATION Surveillance Frequency (SR 3.3.3.2.3), and rennumbers of current SR 3.3.3.2.3 to SR 3.3.3.2.4.

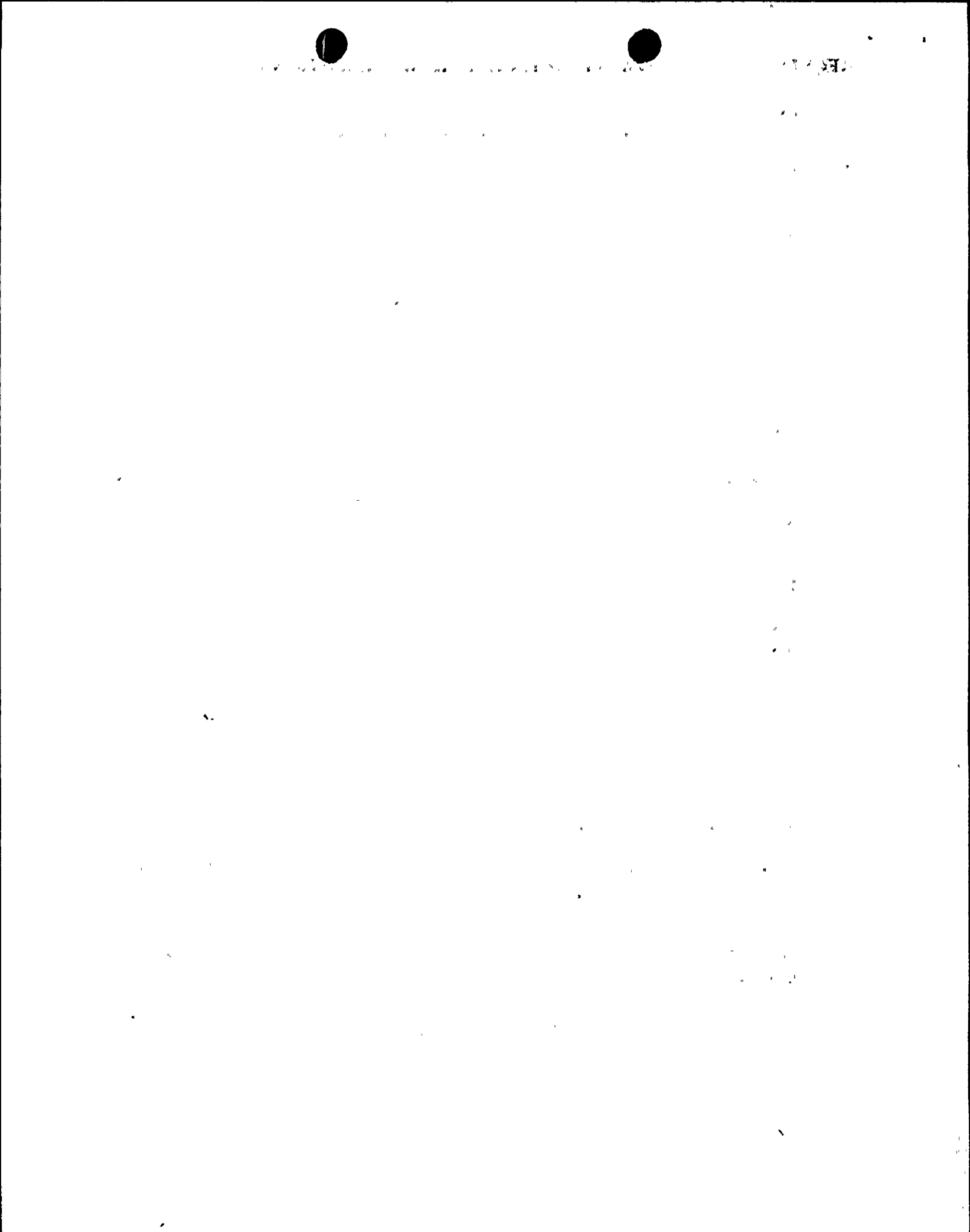
Corresponding changes have also been made to the CTS markup for Specification 3.3.3.2, pages 1 of 3 and 3 of 3, to the Discussion of Changes M.1 and LE.1 for ITS 3.3.3.1 (pages 1 and 2), to the NUREG-1434 ITS markup, page 3.3-25, and to the NUREG-1434 Bases markup, page B 3.3-69.

36. Specification 3.3.6.1, Table 3.3.6.1-1, Function 5.e Allowable Value, page 3.3-38

The Allowable Value has been changed for consistency with the setpoint calculations. The calculations were recently corrected to remove a head correction factor incorrectly included in the Allowable Value.

Corresponding changes have also been made to the CTS markup for Specification 3.3.6.1, page 9 of 12, to the Discussion of Changes M.6 to ITS 3.3.6.1 (page 5), and to the NUREG-1434 ITS markup, page 3.3-61.

37. Specification 3.3.5.1, Table 3.3.5.1-1, Functions 1.c, 1.d, 2.c, and 2.d, and Specification 3.3.8.1, Table 3.3.8.1-1, Functions 1.b, 1.c, 1.d, and 2.b, pages 3.3-42, 3.3-43, 3.3-44, 3.3-45, 3.3-46, 3.3-69, 3.3-70, B 3.3-130, B 3.3-131, B 3.3-211, and B 3.3-212



# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 12 of 22

## REVISION B SUMMARY OF CHANGES

### 37. (continued)

The CHANNEL CALIBRATION Frequency for these instrument Functions has been changed from 92 days (for Specification 3.3.5.1) and 18 months (for Specification 3.3.8.1) to 24 months consistent with the 24 month calibration interval in the setpoint calculations. These instrument functions are not in the CTS. When added, the incorrect CHANNEL CALIBRATION Surveillance Frequency was used. Therefore, the 92 day CHANNEL CALIBRATION SR and the 18 month CHANNEL CALIBRATION SR have been replaced with new SR 3.3.5.1.5 and new SR 3.3.8.1.3, respectively (24 month CHANNEL CALIBRATIONS). In addition, old SR 3.3.5.1.5 and SR 3.3.8.1.3 have been renumbered, which affects all Functions in Tables 3.3.5.1-1 and 3.3.8.1-1.

Corresponding changes have also been made to the CTS markup for Specification 3.3.5.1, page 1 of 12 and 12 of 12, to the Discussion of Changes M.2 and LD.1 for ITS 3.3.5.1 (pages 3 and 5), to the CTS markup for Specification 3.3.8.1, page 1 of 5, to the Discussion of Changes LD.1 for ITS 3.3.8.1 (page 3), to the NUREG-1434 ITS markup, pages 3.3-40, 3.3-41, Insert Page 3.3-41, 3.3-42, Insert Page 3.3-42, 3.3-43, 3.3-44, 3.3-45, 3.3-81, and 3.3-82, to the Justification for Deviations to Section 3.3, comment numbers 24 and 41 (pages 4 and 6), and to the NUREG-1434 Bases markup, pages B 3.3-127, B 3.3-128, and B 3.3-239.

### 38. Discussion of Changes L.2 to ITS 3.8.7 (page 2) and Discussion of Changes L.1 to ITS 3.8.8 (page 3)

The Discussion of Changes have been modified to describe the primary and alternate verification methods for power availability. This change was requested by the NRC reviewer to resolve Section 3.8, comment 14.

### 39. Bases 3.6.1.7, Suppression Chamber-to Drywell Vacuum Breakers, page B 3.6-44

The LCO Bases Section has been clarified for the vacuum breaker operability. Both vacuum breaker disks are required to be OPERABLE for opening and closed for the vacuum breaker to be considered OPERABLE. Background Section details have been added to the LCO Section for clarity and consistency. This change was requested by the NRC reviewer to resolve Section 3.6, comment 8.

Corresponding changes have been made to the NUREG-1434 Bases markup, Insert page B 3.6-47i.

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 13 of 22

## REVISION B SUMMARY OF CHANGES

40. Discussion of Changes LB.1 to ITS 3.3.1.1 (page 6), Discussion of Changes LB.1 to ITS 3.3.5.1 (page 5), Discussion of Changes LB.1 to ITS 3.3.5.2 (page 3), Discussion of Changes LB.1 to ITS 3.3.6.1 (page 7), and Discussion of Changes LB.1 to ITS 3.3.6.2 (page 4)

The Discussion of Changes have been modified to state that the generic reliability analyses are applicable to the WNP-2 design and NRC SER requirements accepting the generic reliability analyses have been met by WNP-2. The appropriate plant specific NRC SER that documents the acceptance of the WNP-2 design and that WNP-2 complies with the requirements of the generic NRC SER has also been provided. This change was requested by the NRC reviewer to resolve Section 3.3 (Allowable Value issues), comment 3.

41. Discussion of Changes LB.1 and LB.2 to ITS 3.3.2.2 (page 2), Discussion of Changes LB.1, LB.2, and LB.3 to ITS 3.3.4.1 (pages 2 and 3), Discussion of Changes LB.1 and LB.2 to ITS 3.3.4.2 (pages 1 and 2), and Discussion of Changes LB.1 to ITS 3.3.7.1 (page 3)

The Discussion of Changes have been modified to state that the generic reliability analyses are applicable to the WNP-2 design and the NRC SER requirements accepting the generic reliability analyses have been met by WNP-2. In addition, for those "LB" Discussion of Changes extending the CHANNEL FUNCTIONAL TEST Frequency, a statement has been added that WNP-2 has confirmed that the setpoint calculation methodology accounted for instrument drift due to the extended Frequency. This change was requested by the NRC reviewer to resolve Section 3.3 (Allowable Value issues), comment 3.

42. NUREG-1434 ITS markup, page 3.6-13, and Justification for Deviations to Section 3.6, comment number 39 (page 7)

A Justification for Deviation has been added to explain the deletion of the phrase in NUREG Condition I (proposed Condition F): "or during operations with a potential for draining the reactor vessel (OPDRVs)." The Condition is applicable in MODES 4 and 5, the only MODES in which OPDRVs can be performed. In addition, there are no PCIVs required to be OPERABLE in the WNP-2 ITS with an Applicability of only during OPDRVs. The only PCIVs required when not in MODES 1, 2, and 3 are the RHR shutdown cooling isolation valves, and their Applicability is MODES 4 and 5. Therefore, the "during OPDRVs" Applicability is duplicative of the MODES 4 and 5 Applicability (which is being maintained) and can be deleted.

THE UNIVERSITY OF CHICAGO

1911

1911



# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 14 of 22

## REVISION B SUMMARY OF CHANGES

### 43. Justification for Deviations to Section 3.6, comment number 8 (page 1)

The Justification for Deviations to Section 3.6, comment number 8 has been expanded. The phrase inside the brackets for NUREG Conditions A, B, C, and D has been modified to reflect the different leakage categories. Since there is more than one, the generic word "leakage" has been used. The PCIVs are required to be OPERABLE such that they are in the accident position or can be automatically repositioned to the accident position. Certain PCIVs have individual leakage limits. These leakage limits are in addition to the type A, B, and C limits required by LCO 3.6.1.1, Primary Containment OPERABILITY. If a type A, B, or C limit were exceeded due to an individual valve exceeding its specific leakage limit, Note 4 to LCO 3.6.1.3 would require the ACTIONS of LCO 3.6.1.1 to be taken (which require primary containment to be restored within 1 hour).

The change reflects that different compensatory actions are required based on the cause of the inoperability. In the WNP-2 ITS, ACTION A is taken if the PCIV is inoperable for reasons other than leakage; ACTIONS D and E are required if the SRs for individual valve leakage limits are not met. Currently the NUREG Condition A exempts purge valve leakage requirements and secondary containment bypass leakage requirements. If a MSIV or a hydrostatically tested valve was not meeting the leakage limits, Condition A would be entered and Required Action A would be required. This Required Action allows the penetration to be isolated. However, isolating the penetration can be performed by using the leaking valve. This would not provide adequate compensatory measures to allow continued operation. When a MSIV or hydrostatically tested valve leakage is not within limits, Condition D should be entered. The Required Action for this Condition would require the leakage to be restored within limit in 4 hours, consistent with the time provided in Required Action A.1 to isolate the penetration. As discussed in the NUREG Bases, the leakage can be restored by isolating the penetration with a valve not exceeding the leakage limits. This is more restrictive than Required Action A.1, which allows isolation using the leaking valve. Conditions B and C have also been modified to exclude leakage. These Conditions are appropriate if the valve is in the incorrect position or will not close. As discussed above, the Required Actions for Conditions B and C would also allow the penetration to be isolated using the leaking valve if the bracketed phrase were not deleted.

### 44. Discussion of Changes L.6 to ITS 3.3.6.1 (page 15)

The Discussion of Changes was modified to clarify purpose of the instruments. This change was requested by the NRC reviewer (SCSB) to resolve comment 1 to the I&C related changes.

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 15 of 22

## REVISION B SUMMARY OF CHANGES

45. Discussion of Changes L.5 to ITS 3.8.4 (page 4)

The Discussion of Changes was modified to explicitly state the battery charger vendor recommendations and the rationale behind these recommendations.

46. Discussion of Changes L.20 to ITS 3.8.1 (page 15)

The Discussion of Changes was modified to state the total ECCS response time (for each ECCS subsystem), including the individual component response times, and the source document for this information.

47. Specification 3.8.4, DC Sources-Operating, SRs 3.8.4.3, 3.8.4.4, 3.8.4.5, and 3.8.4.8, pages 3.8-27, 3.8-29, B 3.8-56, B 3.8-57, and B 3.8-60

The Surveillance Frequencies for SRs 3.8.4.3, 3.8.4.4, 3.8.4.5, and 3.8.4.8 (second Frequency) have been changed from 18 months to 12 months. WNP-2 currently performs these Surveillances every 12 months during the annual refueling and maintenance outage. The proposed 12 month Frequency is consistent with IEEE-450 recommendations.

Corresponding changes have also been made to the CTS markup for Specification 3.8.4, pages 2 of 4 and 3 of 4, to the Discussion of Changes M.1 to ITS 3.8.4 (page 1), to the NUREG-1434 ITS markup, pages 3.8-28 and 3.8-30, and to the NUREG-1434 Bases markup, pages B 3.8-56, Insert B 3.8-56, and B 3.8-59.

48. Discussion of Changes A.5 to ITS 3.4.12 (page 2)

The Discussion of Changes was modified to state that SR 3.0.1 will ensure the applicable Surveillance is met prior to entry into the Applicability of the SR. The Applicability of the SR is stated in the Note to the SR. If the SR is not performed prior to commencing tensioning of the reactor vessel head bolting studs, as soon as tensioning starts, SR 3.0.1 requires the LCO to be declared not met. This will require immediate action to be taken to restore the limit and perform an engineering evaluation to determine the RCS is acceptable for operation, as stated in the LCO's ACTIONS. Therefore, SR 3.0.1 essentially precludes the tensioning from starting if the SR is not current. This change was requested by the NRC reviewer to resolve a comment concerning Section 3.4.

49. Bases 3.8.1, AC Sources - Operating, pages B 3.8-22, B 3.8-23, B 3.8-24, B 3.8-27, and B 3.8-28

The reactive load values corresponding to the power factor limits have been added to the Bases for SR 3.8.1.9, SR 3.8.1.10, and SR 3.8.1.14. In addition, a discussion to DG excitation system limitation ratings) has been added to the associated SR Notes.

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 16 of 22

## REVISION B SUMMARY OF CHANGES

49. (continued)

Corresponding changes have also been made to the NUREG-1434 Bases markup, pages B 3.8-22, Insert page B 3.8-22, B 3.8-23, Insert page B 3.8-23, B 3.8-28, and Insert page B 3.8-28.

50. Specification 5.5.8, Explosive Gas and Storage Tank Radioactivity Monitoring Program, page 5.0-14

The limit for the outside temporary liquid radwaste tanks has been modified based on NRC reviewer comments concerning 10 CFR 20 requirements.

Corresponding changes have also been made to the CTS markup for Specification 5.5, page 15 of 17, and to the NUREG-1434 ITS markup, page 5.0-14.

51. Specification 1.1, Definition of L<sub>a</sub>, Specification 3.6.1.1, Primary Containment, SR 3.6.1.1.1, Specification 3.6.1.2, Primary Containment Air Lock, SR 3.6.1.2.1, Specification 3.6.1.3, PCIVs, SRs 3.6.1.3.10, 3.6.1.3.11, and 3.6.1.3.12, and Specification 5.5.12, Primary Containment Leakage Rate Testing Program, pages 1.1-4, 3.6-2, 3.6-7, 3.6-15, 3.6-16, 5.0-17, B 3.0-12, B 3.6-1, B 3.6-2, B 3.6-3, B 3.6-4, B 3.6-5, B 3.6-11, B 3.6-12, B 3.6-13, B 3.6-27, and B 3.6-28

The Technical Specifications have been modified to reflect 10 CFR 50, Appendix J, Option B testing requirements recently approved in Amendment 144 to the WNP-2 Technical Specifications. The ITS revision uses the guidance provided in the NRC letter from C. I. Grimes to D. J. Modeen, dated November 2, 1995.

Corresponding changes have also been made to the CTS markup for Chapter 1.0, pages 5 of 19 and 6 of 19, to the Discussion of Changes A.11 for ITS Chapter 1.0 (page 3), to the CTS markup for Specification 3.6.1.1, pages 1 of 9 through 9 of 9, to the Discussion of Changes A.3, A.5, A.6, and A.7 for ITS 3.6.1.1 (pages 1 and 2), to the CTS markup for Specification 3.6.1.2, pages 1 of 2 and 2 of 2, to the Discussion of Changes A.2 and A.6 for Specification 3.6.1.2 (pages 1 and 2), to the CTS markup for Specification 3.6.1.3, pages 1 of 22 through 22 of 22, to the Discussion of Changes M.3, L.A.4 (new), and L.10 for ITS 3.6.1.3 (pages 3, 4, and 7), to the CTS markup for Specification 5.5, pages 1 of 17 through 17 of 17, to the Discussion of Changes A.12 (new) for ITS 5.5 (page 2), to the NSHE L.10 for ITS 3.6.1.3 (page 11), to the NUREG-1434 ITS markup, page 1.1-4, to the Justification for Deviations to Chapter 1.0, comment number 10 (new), page 1, to the NUREG-1434 ITS markup, pages 3.6-2, 3.6-7, 3.6-17, and 3.6-18, to the Justification for Deviation to Section 3.6, comment number

THE JOURNAL OF THE AMERICAN MEDICAL ASSOCIATION  
PUBLISHED WEEKLY  
CHICAGO, ILL., U.S.A.  
Subscription price, \$5.00 per annum in advance.  
Single copies, 15 cents.  
Entered as Second-Class Matter, May 2, 1917.  
Acceptance for mailing at special rate of postage provided for in Act of October 3, 1917.  
Postage paid at Chicago, Ill.  
Copyright, 1918, by American Medical Association  
Printed at the American Medical Association, 535 North Dearborn Street, Chicago, Ill.

18  
18  
18

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 17 of 22

## REVISION B SUMMARY OF CHANGES

51. (continued)

40 (new), page 7, to the NUREG-1434 ITS markup, pages 5.0-17 and Insert page 5.0-17 (new), to the Justification for Deviations to Chapter 5.0, comment number 31 (new), page 4, to the NUREG-1434 Bases markup, pages B 3.0-13 and Insert Page B 3.0-13, to the Justification for Deviations to Bases Section 1.0, comment number 9 (new), page 1, and to the NUREG-1434 Bases markup, pages B 3.6-2, B 3.6-4, B 3.6-5, B 3.6-12, B 3.6-14, B 3.6-30, B 3.6-31, and B 3.6-32.

52. Discussion of Changes L.1 to ITS Chapter 4.0 (page 3)

The term "safe shielding level" used by the NRC in NUREG-0892 has been clarified by the addition of the parenthetical phrase "i.e., the fuel will remain covered, as required by Regulatory Guide 1.13, Rev. 1." This change was requested by the NRC reviewer during a phone conversation to resolve a comment concerning Chapter 4.0.

53. Specification 3.4.7, RCS PIV Leakage, SR 3.4.7.1, pages 3.4-15 and B 3.4-37

The minimum test pressure has been provided. This change was verbally requested by the NRC reviewer to resolve a comment concerning Section 3.4.

Corresponding changes have also been made to the NUREG-1434 ITS markup, page 3.4-13 and to the NUREG-1434 Bases markup, page B 3.4-31.

54. Specification 3.5.1, ECCS-Operating, LCO, pages 3.5-1, B 3.5-5, and B 3.5-7

The change requesting a reduction in the number of required ADS valves from six to five has been withdrawn at the request of the NRC reviewer. The original change will be considered on a generic basis for all BWRs.

Corresponding changes have also been made to the CTS markup for Specification 3.5.1, pages 1 of 6 and 3 of 6, to the Discussion of Changes A.6 (new) and L.1 for ITS 3.5.1 (pages 2 and 4), to the NUREG-1434 ITS markup, page 3.5-1, and to the NUREG-1434 Bases markup, pages B 3.5-4 and B 3.5-7.

55. Discussion of Changes LA.2 to ITS 3.8.4, page 2

Additional justification has been provided for the relocation of the  $\pm 24$  volt batteries and associated chargers. This change was verbally requested by the NRC reviewer to resolve a comment concerning Section 3.8.

... ..

॥ १ ॥

[illegible]

44

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 18 of 22

## REVISION B SUMMARY OF CHANGES

### 56. Specification 3.8.4, DC Sources-Operating, SRs 3.8.4.2 and 3.8.4.5, page 3.8-27

The change requesting relocation of the battery connection resistances from the Technical Specifications to the Bases has been withdrawn.

Corresponding changes have also been made to the CTS markup for Specification 3.8.4, page 2 of 4, to the Discussion of Changes M.2 (new) and LA.3 (deleted) for ITS 3.8.4, pages 1 and 2, to the NUREG-1434 ITS markup, page 3.8-28 and new insert page 3.8-38, and to the Justification for Deviations to Section 3.8, comment number 21 (deleted)(page 4).

### 57. Technical Specifications - Editorial Changes/Typographical Errors

Minor changes are proposed to the following Technical Specifications for consistency, clarity, or to correct typographical errors:

Specification 3.3.3.1, SR 3.3.3.1.2, page 3.3-25;

Specification 3.4.2, Header, pages 3.4-3 and 3.4-4;

Specification 3.4.6, Required Action B.1, page 3.4-11;

Specification 3.6.2.2, LCO, page 3.6-31;

Specification 3.6.3.2, Title of Specification, pages 3.6-36 and 3.6-37;

Specification 3.8.1, SR 3.8.1.15, page 3.8-15;

Specification 3.8.2, LCO 3.8.2.a, page 3.8-19;

Specification 3.8.3, Conditions A and F, and Required Action A.1, pages 3.8-23 and 3.8-24; and

Specification 5.5.7.c, page 5.0-13.

### 58. Bases - Editorial Changes/Typographical Errors

Minor changes are proposed to the following Technical Specifications Bases for consistency, clarity, or to correct typographical errors:

B 3.3.1.2, Surveillance Requirements Section, page B 3.3-40;

B 3.4.8, References Section, page B 3.4-43;

B 3.4.11, Background Section, page B 3.4-53;





# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 19 of 22

## REVISION B SUMMARY OF CHANGES

58. (continued)

B 3.5.1, Applicable Safety Analyses Section, page B 3.5-4:

B 3.5.2, Applicable Safety Analyses Section, page B 3.5-16;

B 3.6.3.1, LCO Section, page B 3.6-16;

B 3.6.3.2, Title, Background Section, Applicable Safety Analyses Section, and Applicability Section, pages B 3.6-70, B 3.6-71, B 3.6-72, and B 3.6-73;

B 3.9.6, Background Section, page B 3.9-19;

B 3.9.8, Background Section, page B 3.9-25;

B 3.9.9, Background Section, page B 3.9-29; and

B 3.10.8, Actions Section, page B 3.10-34.

59. CTS Markups and Discussion of Changes - Editorial Changes/ Typographical Errors

Minor changes are proposed to the following CTS markups and Discussion of Changes for consistency, clarity, or to correct typographical errors:

CTS markup for Specification 3.1.3, page 1 of 9, and Discussion of Changes L.4 and L.11 to ITS 3.1.3 (pages 9 and 11);

Discussion of Changes LD.1 to ITS 3.1.7 (page 3);

CTS markup for Specification 3.3.1.1, page 7 of 11;

Discussion of Changes LE.1 to ITS 3.3.2.2 (page 7);

Discussion of Changes LE.1 to ITS 3.3.3.1 (page 8);

Discussion of Changes A.2, A.3, and M.1 to ITS 3.3.5.2 (pages 1 and 2);

Discussion of Changes R.1, LE.1, and L.2 to ITS 3.3.6.1 (pages 3, 12, and 14);

Discussion of Changes M.4 to ITS 3.3.7.1 (page 3);

Discussion of Changes LD.1 to ITS 3.3.8.1 (page 4);

CTS markup for Specification 3.4.1, page 11 of 11;

1. The first part of the document is a list of names and dates, which appears to be a roster or a list of events. The names are written in a cursive script, and the dates are in a standard font. The list is organized into two columns, with names on the left and dates on the right.

2. The second part of the document is a list of names and dates, which appears to be a roster or a list of events. The names are written in a cursive script, and the dates are in a standard font. The list is organized into two columns, with names on the left and dates on the right.

3. The third part of the document is a list of names and dates, which appears to be a roster or a list of events. The names are written in a cursive script, and the dates are in a standard font. The list is organized into two columns, with names on the left and dates on the right.

4. The fourth part of the document is a list of names and dates, which appears to be a roster or a list of events. The names are written in a cursive script, and the dates are in a standard font. The list is organized into two columns, with names on the left and dates on the right.

5. The fifth part of the document is a list of names and dates, which appears to be a roster or a list of events. The names are written in a cursive script, and the dates are in a standard font. The list is organized into two columns, with names on the left and dates on the right.

6. The sixth part of the document is a list of names and dates, which appears to be a roster or a list of events. The names are written in a cursive script, and the dates are in a standard font. The list is organized into two columns, with names on the left and dates on the right.

7. The seventh part of the document is a list of names and dates, which appears to be a roster or a list of events. The names are written in a cursive script, and the dates are in a standard font. The list is organized into two columns, with names on the left and dates on the right.

8. The eighth part of the document is a list of names and dates, which appears to be a roster or a list of events. The names are written in a cursive script, and the dates are in a standard font. The list is organized into two columns, with names on the left and dates on the right.

9. The ninth part of the document is a list of names and dates, which appears to be a roster or a list of events. The names are written in a cursive script, and the dates are in a standard font. The list is organized into two columns, with names on the left and dates on the right.

10. The tenth part of the document is a list of names and dates, which appears to be a roster or a list of events. The names are written in a cursive script, and the dates are in a standard font. The list is organized into two columns, with names on the left and dates on the right.

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 20 of 22

## REVISION B SUMMARY OF CHANGES

59. (continued)

Discussion of Changes LA.4 to ITS 3.4.1 (page 4);

Discussion of Changes A.1 to ITS 3.4.7 (page 1);

CTS markup for Specification 3.5.2 pages 2 of 5 and 3 of 5;

Discussion of Changes LA.1 and LA.2 to ITS 3.5.3 (page 1);

Discussion of Changes header to ITS 3.6.1.2 (page 4);

Discussion of Changes A.1 and LA.2 to ITS 3.6.1.3 (pages 1 and 3);

CTS markup for Specification 3.6.3.2, page 1 of 1, and the Discussion of Changes Title to ITS 3.6.3.2 (page 1);

CTS markup for Specification 3.6.4.2, page 3 of 3, and Discussion of Changes L.1 to ITS 3.6.4.2 (page 3);

Discussion of Changes A.3 and A.5 to ITS 3.7.3 (page 1);

CTS markup for Specification 3.8.1, pages 4 of 9 and 6 of 9, and Discussion of Changes M.6 and LA.4 to ITS 3.8.1 (pages 4 and 6);

Discussion of Changes A.1 to ITS 3.8.5 (page 1);

Discussion of Changes M.3 to ITS 3.8.8 (page 2);

Discussion of Changes R.1 to CTS 3/4.9.7 (page 1);

Discussion of Changes A.7 to ITS 3.10.4 (page 2);

Discussion of Changes Header to CTS 3/4.10.5 (page 1);

Discussion of Changes Header to CTS 3/4.10.6 (page 1);

Discussion of Changes A.3 to ITS Chapter 4.0 (page 1);

Discussion of Changes L.1 to ITS 5.2 (page 4);

CTS markup for Specification 5.5, pages 11 of 17 and 13 of 17, and Discussion of Changes LA.4 to ITS 5.5 (page 4); and

Discussion of Changes Title to CTS 6.10 (page 1).



12

12

12

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 21 of 22

## REVISION B SUMMARY OF CHANGES

### 60. No Significant Hazards Evaluations - Editorial Changes/ Typographical Errors

Minor changes are proposed to the following No Significant Hazards Evaluations for consistency, clarity, or to correct typographical errors:

NSHE for ITS 3.6.3.2, Title, page 1;

NSHE for CTS 3/4.10.5, Header, page 1; and

NSHE for CTS 3/4.10.6, Header, page 1.

### 61. NUREG ITS Markup and Justification for Deviations - Editorial Changes/Typographical Errors

Minor changes are proposed to the following NUREG ITS markups and Justification for Deviations for consistency, clarity, or to correct typographical errors:

Justification for Deviations to Chapter 2.0, Header (page 1);

Specification 3.3.8.2, SR 3.3.8.2.4, page 3.3-85;

Specification 3.4.5, Required Action B.1, page 3.4-9;

Specification 3.6.3.2, Title of Specification, Insert pages 3.6-41a and 3.6-41b, and Justification for Deviations to Section 3.6, comment number 33 (page 6);

Justification for Deviations to Section 3.6, comment number 9 (page 1);

Specification 3.8.1, SR 3.8.1.15, page 3.8-15;

Specification 3.8.2, LCO 3.8.2.a and ACTIONS Note, pages 3.8-20 and 3.8-21;

Specification 3.8.3, Conditions A and F, and Required Action A.1, pages 3.8-24 and 3.8-25;

Specification 3.8.4, SR 3.8.4.3, page 3.8-28;

Specification 5.5.7.c, page 5.0-12;

Specification 5.5.9, page 5.0-14; and

Specification 5.6.2, page 5.0-19.



# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 1

Page 22 of 22

## REVISION B SUMMARY OF CHANGES

### 62. NUREG Bases Markup and Justification for Deviations - Editorial Changes/Typographical Errors

Minor changes are proposed to the following NUREG ITS markups and Justification for Deviations for consistency, clarity, or to correct typographical errors:

Bases 3.3.8.2, SR 3.3.8.2.4, page B 3.3-246;

Bases 3.4.8, Reference Section, page B 3.4-37;

Bases 3.4.11, Background Section, page B 3.4-47;

Justification for Deviations to Section 3.4, comment number 8 (page 1);

Bases 3.5.1, Applicable Safety Analyses and Actions Sections, pages B 3.5-4 and B 3.5-6;

Bases 3.5.2, Applicable Safety Analyses Section, page B 3.5-14;

Bases 3.6.1.3, LCO Section, page B 3.6-17;

Bases 3.6.3.2, Title, Background Section, Applicable Safety Analyses Section, and Applicability Section, Insert pages B 3.6-86a, B 3.6-86b, B 3.6-86c, B 3.6-86d, B 3.6-86e, and B 3.6-86f, and Justification for Deviations to Bases Section 3.6, comment number 16 (page 2);

Bases 3.8.3, Reference Section, page B 3.8-50;

Bases 3.9.6, Background Section, page B 3.9-19;

Bases 3.9.8, Background Section, page B 3.9-25;

Bases 3.9.9, Background Section, page B 3.9-29;

Bases 3.10.2, SR 3.10.2.1 and SR 3.10.2.2, page Insert B 3.10-10; and

Bases 3.10.8, Actions Section, pages B 3.10-36 and B 3.10-37, and Justification for Deviations to Section 3.10, comment number 14 (page 1).





**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Enclosure 2

Page 1 of 14

**INSERT AND REMOVE INSTRUCTIONS**

<b>VOLUME 1, SPLIT REPORT</b>	
<b>DISCARD</b>	<b>INSERT</b>
Page 8 of Summary Disposition Matrix	Page 8 of Summary Disposition Matrix
Page 1 of 28	Page 1 of 28
Page 2 of 28	Page 2 of 28
<b>VOLUME 2, TECHNICAL SPECIFICATIONS</b>	
<b>DISCARD</b>	<b>INSERT</b>
1.1-4 through 1.1-7	1.1-4 through 1.1-7
2.0-1 through 2.0-2	2.0-1
3.1-19	3.1-19
3.3-5	3.3-5
3.3-25	3.3-25
3.3-28	3.3-28
3.3-42 through 3.3-46	3.3-42 through 3.3-46
3.3-55	3.3-55
3.3-58	3.3-58
3.3-69 through 3.3-72	3.3-69 through 3.3-72
3.4-3 through 3.4-29	3.4-3 through 3.4-30
3.5-1	3.5-1
3.6-2	3.6-2
3.6-7	3.6-7
3.6-15 through 3.6-48	3.6-15 through 3.6-47
3.8-15	3.8-15
3.8-19	3.8-19
3.8-23	3.8-23
3.8-24	3.8-24
3.8-27 through 3.8-29	3.8-27 through 3.8-29
3.9-1 through 3.9-15	3.9-1 through 3.9-16
3.10-9	3.10-9



THE UNIVERSITY OF CHICAGO

LIBRARY

1964

1965

1966

1967

1968

1969

1970

1971

1972

1973

1974

1975

1976

1977

1978

1979

1980

1981

1982

1983

1984

**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Enclosure 2

Page 2 of 14

**INSERT AND REMOVE INSTRUCTIONS**

<b>VOLUME 2, TECHNICAL SPECIFICATIONS.</b>	
<b>DISCARD</b>	<b>INSERT</b>
5.0-13 through 5.0-15	5.0-13 through 5.0-15
5.0-17 through 5.0-26	5.0-17 through 5.0-27
<b>VOLUME 3, BASES</b>	
<b>DISCARD</b>	<b>INSERT</b>
B 2.0-5 through B 2.0-10	B 2.0-5 through B 2.0-8
B 3.0-12	B 3.0-12
B 3.0-13	B 3.0-13
B 3.2-15	B 3.2-15
B 3.3-4	B 3.3-4
B 3.3-27	B 3.3-27
B 3.3-40	B 3.3-40
B 3.3-75	B 3.3-75
B 3.3-76	B 3.3-76
B 3.3-130	B 3.3-130
B 3.3-131	B 3.3-131
B 3.3-209 through B 3.3-212	B 3.3-209 through B 3.3-212
B 3.3-214 through B 3.3-220	B 3.3-214 through B 3.3-220
B 3.4-9	B 3.4-9
B 3.4-10	B 3.4-10
B 3.4-31	B 3.4-31
B 3.4-37	B 3.4-37
B 3.4-38	B 3.4-38
B 3.4-43	B 3.4-43
B 3.4-51	B 3.4-51
B 3.4-53	B 3.4-53
B 3.4-55	B 3.4-55
B 3.4-56	B 3.4-56



THE UNIVERSITY OF CHICAGO PRESS

CHICAGO, ILLINOIS

1968

1969

1970

1971

1972

1973

1974

1975

1976

1977

1978

1979

1980

1981

1982

1983

1984

1985

1986

1987

1988

1989

1990

1991

1992

1993

1994

1995

**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Enclosure 2

Page 3 of 14

**INSERT AND REMOVE INSTRUCTIONS**

<b>VOLUME 4, BASES</b>	
<b>DISCARD</b>	<b>INSERT</b>
B 3.5-4	B 3.5-4
B 3.5-5	B 3.5-5
B 3.5-7	B 3.5-7
B 3.5-16	B 3.5-16
B 3.6-1 through B 3.6-5	B 3.6-1 through B 3.6-5
B 3.6-11 through B 3.6-13	B 3.6-11 through B 3.6-13
B 3.6-16	B 3.6-16
B 3.6-27	B 3.6-27
B 3.6-28	B 3.6-28
B 3.6-32	B 3.6-32
B 3.6-33	B 3.6-33
B 3.6-44	B 3.6-44
B 3.6-70 through B 3.6-73	B 3.6-70 through B 3.6-73
B 3.8-22 through B 3.8-33	B 3.8-22 through B 3.8-33
B 3.8-56	B 3.8-56
B 3.8-57	B 3.8-57
B 3.8-60	B 3.8-60
B 3.9-2 through B 3.9-4	B 3.9-2 through B 3.9-4
B 3.9-19	B 3.9-19
B 3.9-25	B 3.9-25
B 3.9-29	B 3.9-29
B 3.10-16	B 3.10-16
B 3.10-34	B 3.10-34



1. The first part of the document is a list of names and addresses.

2. The second part of the document is a list of names and addresses.

3. The third part of the document is a list of names and addresses.

4. The fourth part of the document is a list of names and addresses.

5.

6. The sixth part of the document is a list of names and addresses.

7. The seventh part of the document is a list of names and addresses.

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 2

Page 4 of 14

## INSERT AND REMOVE INSTRUCTIONS

VOLUME 5 CURRENT TECHNICAL SPECIFICATION (CTS) COMPARISON DOCUMENT	
DISCARD	INSERT
CTS markup for Chapter 1.0 Page 5 of 19 through 7 of 19	CTS markup for Chapter 1.0 Page 5 of 19 through 7 of 19
Discussion of Changes ITS Chapter 1.0 Page 3	Discussion of Changes ITS Chapter 1.0 Page 3
CTS markup for Chapter 2.0 Page 1 of 6 through Page 6 of 6	CTS markup for Chapter 2.0 Page 1 of 5 through Page 5 of 5
Discussion of Changes ITS Chapter 2.0 Page 1	Discussion of Changes ITS Chapter 2.0 Page 1
Discussion of Changes ITS Chapter 2.0 Page 2	Discussion of Changes ITS Chapter 2.0 Page 2
CTS markup for Specification 3.1.3 Page 1 of 9	CTS markup for Specification 3.1.3 Page 1 of 9
Discussion of Changes ITS 3.1.3 Page 9	Discussion of Changes ITS 3.1.3 Page 9
Discussion of Changes ITS 3.1.3 Page 11	Discussion of Changes ITS 3.1.3 Page 11
Discussion of Changes ITS 3.1.7 Page 3	Discussion of Changes ITS 3.1.7 Page 3
CTS markup for Specification 3.3.1.1 Page 7 of 11	CTS markup for Specification 3.3.1.1 Page 7 of 11
CTS markup for Specification 3.3.1.1 Page 8 of 11	CTS markup for Specification 3.3.1.1 Page 8 of 11
Discussion of Changes ITS 3.3.1.1 Pages 3 through 7	Discussion of Changes ITS 3.3.1.1 Pages 3 through 7
Discussion of Changes ITS 3.3.1.1 Page 11	Discussion of Changes ITS 3.3.1.1 Page 11
Discussion of Changes ITS 3.3.1.1 Page 12	Discussion of Changes ITS 3.3.1.1 Page 12
Discussion of Changes ITS 3.3.2.1 Page 2	Discussion of Changes ITS 3.3.2.1 Page 2
Discussion of Changes ITS 3.3.2.1 Page 3	Discussion of Changes ITS 3.3.2.1 Page 3
Discussion of Changes ITS 3.3.2.2 Pages 2 through 4	Discussion of Changes ITS 3.3.2.2 Pages 2 through 4
Discussion of Changes ITS 3.3.2.2 Page 7	Discussion of Changes ITS 3.3.2.2 Page 7
Discussion of Changes ITS 3.3.3.1 Pages 2 through 8	Discussion of Changes ITS 3.3.3.1 Pages 2 through 8
CTS markup for Specification 3.3.3.2 Page 1 of 3	CTS markup for Specification 3.3.3.2 Page 1 of 3
CTS markup for Specification 3.3.3.2 Page 3 of 3	CTS markup for Specification 3.3.3.2 Page 3 of 3
Discussion of Changes ITS 3.3.3.2 Page 1 and 2	Discussion of Changes ITS 3.3.3.2 Page 1 through 7
Discussion of Changes ITS 3.3.4.1 Pages 2 through 4	Discussion of Changes ITS 3.3.4.1 Pages 2 through 4
CTS markup for Specification 3.3.4.2 Page 1 of 4	CTS markup for Specification 3.3.4.2 Page 1 of 4
CTS markup for Specification 3.3.4.2 Page 3 of 4	CTS markup for Specification 3.3.4.2 Page 3 of 4
Discussion of Changes ITS 3.3.4.2 Pages 1 through 4	Discussion of Changes ITS 3.3.4.2 Pages 1 through 4





# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 2

Page 5 of 14

## INSERT AND REMOVE INSTRUCTIONS

VOLUME 5 CURRENT TECHNICAL SPECIFICATION (CTS) COMPARISON DOCUMENT	
DISCARD	INSERT
CTS markup for Specification 3.3.5.1 Page 1 of 12	CTS markup for Specification 3.3.5.1 Page 1 of 12
CTS markup for Specification 3.3.5.1 Page 12 of 12	CTS markup for Specification 3.3.5.1 Page 12 of 12
Discussion of Changes ITS 3.3.5.1 Page 3	Discussion of Changes ITS 3.3.5.1 Page 3
Discussion of Changes ITS 3.3.5.1 Pages 5 through 8	Discussion of Changes ITS 3.3.5.1 Pages 5 through 8
Discussion of Changes ITS 3.3.5.2 Pages 1 through 4	Discussion of Changes ITS 3.3.5.2 Pages 1 through 4
CTS markup for Specification 3.3.6.1 Page 6 of 12	CTS markup for Specification 3.3.6.1 Page 6 of 12
CTS markup for Specification 3.3.6.1 Page 7 of 12	CTS markup for Specification 3.3.6.1 Page 7 of 12
CTS markup for Specification 3.3.6.1 Page 9 of 12	CTS markup for Specification 3.3.6.1 Page 9 of 12
Discussion of Changes ITS 3.3.6.1 Page 3	Discussion of Changes ITS 3.3.6.1 Page 3
Discussion of Changes ITS 3.3.6.1 Page 5	Discussion of Changes ITS 3.3.6.1 Page 5
Discussion of Changes ITS 3.3.6.1 Pages 7 through 9	Discussion of Changes ITS 3.3.6.1 Pages 7 through 9
Discussion of Changes ITS 3.3.6.1 Pages 12 through 17	Discussion of Changes ITS 3.3.6.1 Pages 12 through 18
CTS markup for Specification 3.3.6.2 Page 4 of 8	CTS markup for Specification 3.3.6.2 Page 4 of 8
Discussion of Changes ITS 3.3.6.2 Pages 4 through 6	Discussion of Changes ITS 3.3.6.2 Pages 4 through 6
CTS markup for Specification 3.3.7.1 Page 2 of 4 through Page 4 of 4	CTS markup for Specification 3.3.7.1 Page 2 of 4 through Page 4 of 4
Discussion of Changes ITS 3.3.7.1 Pages 1 through 4	Discussion of Changes ITS 3.3.7.1 Pages 1 through 5
CTS markup for Specification 3.3.8.1 Page 1 of 5	CTS markup for Specification 3.3.8.1 Page 1 of 5
CTS markup for Specification 3.3.8.1 Page 3 of 5	CTS markup for Specification 3.3.8.1 Page 3 of 5
CTS markup for Specification 3.3.8.1 Page 5 of 5	CTS markup for Specification 3.3.8.1 Page 5 of 5
Discussion of Changes ITS 3.3.8.1 Pages 1 through 6	Discussion of Changes ITS 3.3.8.1 Pages 1 through 6
CTS markup for Specification 3.3.8.2 Page 1 of 1	CTS markup for Specification 3.3.8.2 Page 1 of 1
Discussion of Changes ITS 3.3.8.2 Pages 1 through 3	Discussion of Changes ITS 3.3.8.2 Pages 1 through 3
CTS markup for Specification 3.4.1 Page 11 of 11	CTS markup for Specification 3.4.1 Page 11 of 11
Discussion of Changes ITS 3.4.1 Page 4	Discussion of Changes ITS 3.4.1 Page 4
Discussion of Changes ITS 3.4.7 Page 1	Discussion of Changes ITS 3.4.7 Page 1
Discussion of Changes ITS 3.4.12 Page 2	Discussion of Changes ITS 3.4.12 Page 2



**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Enclosure 2

Page 6 of 14

**INSERT AND REMOVE INSTRUCTIONS**

<b>VOLUME 5 CURRENT TECHNICAL SPECIFICATION (CTS) COMPARISON DOCUMENT</b>	
<b>DISCARD</b>	<b>INSERT</b>
Discussion of Changes ITS 3.4.12 Page 3	Discussion of Changes ITS 3.4.12 Page 3
<b>VOLUME 6 CURRENT TECHNICAL SPECIFICATION (CTS) COMPARISON DOCUMENT</b>	
<b>DISCARD</b>	<b>INSERT</b>
CTS markup for Specification 3.5.1 Page 1 of 6	CTS markup for Specification 3.5.1 Page 1 of 6
CTS markup for Specification 3.5.1 Page 3 of 6	CTS markup for Specification 3.5.1 Page 3 of 6
Discussion of Changes ITS 3.5-1 Page 2 through 7	Discussion of Changes ITS 3.5-1 Page 2 through 7
CTS markup for Specification 3.5.2 Page 2 of 5 through Page 5 of 5	CTS markup for Specification 3.5.2 Page 2 of 5 through Page 5 of 5
Discussion of Changes ITS 3.5.2 Page 2	Discussion of Changes ITS 3.5.2 Page 2
Discussion of Changes ITS 3.5.2 Page 3	Discussion of Changes ITS 3.5.2 Page 3
Discussion of Changes ITS 3.5.2 Page 5	Discussion of Changes ITS 3.5.2 Page 5
Discussion of Changes ITS 3.5.3 Page 1	Discussion of Changes ITS 3.5.3 Page 1
CTS markup for Specification 3.6.1.1 Page 1 of 9 through Page 9 of 9	CTS markup for Specification 3.6.1.1 Page 1 of 8 through Page 8 of 8
Discussion of Changes ITS 3.6.1.1 Page 1	Discussion of Changes ITS 3.6.1.1 Page 1
Discussion of Changes ITS 3.6.1.1 Page 2	Discussion of Changes ITS 3.6.1.1 Page 2
CTS markup for Specification 3.6.1.2 Page 1 of 2	CTS markup for Specification 3.6.1.2 Page 1 of 2
CTS markup for Specification 3.6.1.2 Page 2 of 2	CTS markup for Specification 3.6.1.2 Page 2 of 2
Discussion of Changes ITS 3.6.1.2 Pages 1 through 4	Discussion of Changes ITS 3.6.1.2 Pages 1 through 4
CTS markup for Specification 3.6.1.3 Page 1 of 22 through Page 22 of 22	CTS markup for Specification 3.6.1.3 Page 1 of 21 through Page 21 of 21
Discussion of Changes ITS 3.6.1.3 Page 1	Discussion of Changes ITS 3.6.1.3 Page 1
Discussion of Changes ITS 3.6.1.3 Pages 3 through 8	Discussion of Changes ITS 3.6.1.3 Pages 3 through 8
CTS markup for Specification 3.6.1.8 Page 1 of 1	CTS markup for Specification 3.6.1.8 Page 1 of 1
Discussion of Changes ITS 3.6.1.8 Pages 2 through 4	Discussion of Changes ITS 3.6.1.8 Pages 2 through 3
CTS markup for Specification 3.6.3.2 Page 1 of 1	CTS markup for Specification 3.6.3.2 Page 1 of 1
Discussion of Changes ITS 3.6.3.2 Page 1	Discussion of Changes ITS 3.6.3.2 Page 1
CTS markup for Specification 3.6.4.1 Page 1 of 1	CTS markup for Specification 3.6.4.1 Page 1 of 1
Discussion of Changes ITS 3.6.4.1 Page 1	Discussion of Changes ITS 3.6.4.1 Page 1

100

1990

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 2

Page 7 of 14

## INSERT AND REMOVE INSTRUCTIONS

VOLUME 6 CURRENT TECHNICAL SPECIFICATION (CTS) COMPARISON DOCUMENT	
DISCARD	INSERT
Discussion of Changes ITS 3.6.4.1 Page 2	Discussion of Changes ITS 3.6.4.1 Page 2
CTS markup for Specification 3.6.4.2 Page 3 of 3	CTS markup for Specification 3.6.4.2 Page 3 of 3
Discussion of Changes ITS 3.6.4.2 Page 3	Discussion of Changes ITS 3.6.4.2 Page 3
CTS markup for Specification 3.7.3 Page 1 of 3	CTS markup for Specification 3.7.3 Page 1 of 3
Discussion of Changes ITS 3.7.3 Page 1	Discussion of Changes ITS 3.7.3 Page 1
Discussion of Changes ITS 3.7.7 Page 1	Discussion of Changes ITS 3.7.7 Page 1
Discussion of Changes ITS 3.7.7 Page 2	Discussion of Changes ITS 3.7.7 Page 2
CTS markup for Specification 3.8.1 Page 4 of 9	CTS markup for Specification 3.8.1 Page 4 of 9
CTS markup for Specification 3.8.1 Page 6 of 9	CTS markup for Specification 3.8.1 Page 6 of 9
Discussion of Changes ITS 3.8.1 Page 4	Discussion of Changes ITS 3.8.1 Page 4
Discussion of Changes ITS 3.8.1 Page 6	Discussion of Changes ITS 3.8.1 Page 6
Discussion of Changes ITS 3.8.1 Pages 15 through 17	Discussion of Changes ITS 3.8.1 Pages 15 through 17
CTS markup for Specification 3.8.4 Page 2 of 4	CTS markup for Specification 3.8.4 Page 2 of 4
CTS markup for Specification 3.8.4 Page 3 of 4	CTS markup for Specification 3.8.4 Page 3 of 4
Discussion of Changes ITS 3.8.4 Pages 1 through 6	Discussion of Changes ITS 3.8.4 Pages 1 through 6
Discussion of Changes ITS 3.8.5 Page 1	Discussion of Changes ITS 3.8.5 Page 1
Discussion of Changes ITS 3.8.7 Page 2	Discussion of Changes ITS 3.8.7 Page 2
None	Discussion of Changes ITS 3.8.7 Page 3
Discussion of Changes ITS 3.8.8 Page 2	Discussion of Changes ITS 3.8.8 Page 2
Discussion of Changes ITS 3.8.8 Page 3	Discussion of Changes ITS 3.8.8 Page 3
Discussion of Changes ITS 3.9.1 Page 2	Discussion of Changes ITS 3.9.1 Page 2
Discussion of Changes ITS 3.9.1 Page 3	Discussion of Changes ITS 3.9.1 Page 3
Discussion of Changes ITS 3.9.2 Page 2	Discussion of Changes ITS 3.9.2 Page 2
Discussion of Changes ITS 3.9.2 Page 3	Discussion of Changes ITS 3.9.2 Page 3
Discussion of Changes ITS 3.9.3 Page 1	Discussion of Changes ITS 3.9.3 Page 1
Discussion of Changes ITS 3.9.3 Page 2	Discussion of Changes ITS 3.9.3 Page 2
Discussion of Changes ITS 3.9.4 Page 2	Discussion of Changes ITS 3.9.4 Page 2
None	Discussion of Changes ITS 3.9.4 Page 3

[illegible]

1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 20. 21. 22. 23. 24. 25. 26. 27. 28. 29. 30. 31. 32. 33. 34. 35. 36. 37. 38. 39. 40. 41. 42. 43. 44. 45. 46. 47. 48. 49. 50. 51. 52. 53. 54. 55. 56. 57. 58. 59. 60. 61. 62. 63. 64. 65. 66. 67. 68. 69. 70. 71. 72. 73. 74. 75. 76. 77. 78. 79. 80. 81. 82. 83. 84. 85. 86. 87. 88. 89. 90. 91. 92. 93. 94. 95. 96. 97. 98. 99. 100. 101. 102. 103. 104. 105. 106. 107. 108. 109. 110. 111. 112. 113. 114. 115. 116. 117. 118. 119. 120. 121. 122. 123. 124. 125. 126. 127. 128. 129. 130. 131. 132. 133. 134. 135. 136. 137. 138. 139. 140. 141. 142. 143. 144. 145. 146. 147. 148. 149. 150. 151. 152. 153. 154. 155. 156. 157. 158. 159. 160. 161. 162. 163. 164. 165. 166. 167. 168. 169. 170. 171. 172. 173. 174. 175. 176. 177. 178. 179. 180. 181. 182. 183. 184. 185. 186. 187. 188. 189. 190. 191. 192. 193. 194. 195. 196. 197. 198. 199. 200. 201. 202. 203. 204. 205. 206. 207. 208. 209. 210. 211. 212. 213. 214. 215. 216. 217. 218. 219. 220. 221. 222. 223. 224. 225. 226. 227. 228. 229. 230. 231. 232. 233. 234. 235. 236. 237. 238. 239. 240. 241. 242. 243. 244. 245. 246. 247. 248. 249. 250. 251. 252. 253. 254. 255. 256. 257. 258. 259. 260. 261. 262. 263. 264. 265. 266. 267. 268. 269. 270. 271. 272. 273. 274. 275. 276. 277. 278. 279. 280. 281. 282. 283. 284. 285. 286. 287. 288. 289. 290. 291. 292. 293. 294. 295. 296. 297. 298. 299. 300. 301. 302. 303. 304. 305. 306. 307. 308. 309. 310. 311. 312. 313. 314. 315. 316. 317. 318. 319. 320. 321. 322. 323. 324. 325. 326. 327. 328. 329. 330. 331. 332. 333. 334. 335. 336. 337. 338. 339. 340. 341. 342. 343. 344. 345. 346. 347. 348. 349. 350. 351. 352. 353. 354. 355. 356. 357. 358. 359. 360. 361. 362. 363. 364. 365. 366. 367. 368. 369. 370. 371. 372. 373. 374. 375. 376. 377. 378. 379. 380. 381. 382. 383. 384. 385. 386. 387. 388. 389. 390. 391. 392. 393. 394. 395. 396. 397. 398. 399. 400. 401. 402. 403. 404. 405. 406. 407. 408. 409. 410. 411. 412. 413. 414. 415. 416. 417. 418. 419. 420. 421. 422. 423. 424. 425. 426. 427. 428. 429. 430. 431. 432. 433. 434. 435. 436. 437. 438. 439. 440. 441. 442. 443. 444. 445. 446. 447. 448. 449. 450. 451. 452. 453. 454. 455. 456. 457. 458. 459. 460. 461. 462. 463. 464. 465. 466. 467. 468. 469. 470. 471. 472. 473. 474. 475. 476. 477. 478. 479. 480. 481. 482. 483. 484. 485. 486. 487. 488. 489. 490. 491. 492. 493. 494. 495. 496. 497. 498. 499. 500. 501. 502. 503. 504. 505. 506. 507. 508. 509. 510. 511. 512. 513. 514. 515. 516. 517. 518. 519. 520. 521. 522. 523. 524. 525. 526. 527. 528. 529. 530. 531. 532. 533. 534. 535. 536. 537. 538. 539. 540. 541. 542. 543. 544. 545. 546. 547. 548. 549. 550. 551. 552. 553. 554. 555. 556. 557. 558. 559. 560. 561. 562. 563. 564. 565. 566. 567. 568. 569. 570. 571. 572. 573. 574. 575. 576. 577. 578. 579. 580. 581. 582. 583. 584. 585. 586. 587. 588. 589. 590. 591. 592. 593. 594. 595. 596. 597. 598. 599. 600. 601. 602. 603. 604. 605. 606. 607. 608. 609. 610. 611. 612. 613. 614. 615. 616. 617. 618. 619. 620. 621. 622. 623. 624. 625. 626. 627. 628. 629. 630. 631. 632. 633. 634. 635. 636. 637. 638. 639. 640. 641. 642. 643. 644. 645. 646. 647. 648. 649. 650. 651. 652. 653. 654. 655. 656. 657. 658. 659. 660. 661. 662. 663. 664. 665. 666. 667. 668. 669. 670. 671. 672. 673. 674. 675. 676. 677. 678. 679. 680. 681. 682. 683. 684. 685. 686. 687. 688. 689. 690. 691. 692. 693. 694. 695. 696. 697. 698. 699. 700. 701. 702. 703. 704. 705. 706. 707. 708. 709. 710. 711. 712. 713. 714. 715. 716. 717. 718. 719. 720. 721. 722. 723. 724. 725. 726. 727. 728. 729. 730. 731. 732. 733. 734. 735. 736. 737. 738. 739. 740. 741. 742. 743. 744. 745. 746. 747. 748. 749. 750. 751. 752. 753. 754. 755. 756. 757. 758. 759. 760. 761. 762. 763. 764. 765. 766. 767. 768. 769. 770. 771. 772. 773. 774. 775. 776. 777. 778. 779. 780. 781. 782. 783. 784. 785. 786. 787. 788. 789. 790. 791. 792. 793. 794. 795. 796. 797. 798. 799. 800. 801. 802. 803. 804. 805. 806. 807. 808. 809. 810. 811. 812. 813. 814. 815. 816. 817. 818. 819. 820. 821. 822. 823. 824. 825. 826. 827. 828. 829. 830. 831. 832. 833. 834. 835. 836. 837. 838. 839. 840.

6 5 4 3 2 1

4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023 1024 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1035 1036 1037 1038 1039 1040 1041 10

[illegible]

Figure 1. The effect of the concentration of the *Agrobacterium* strain on the transformation efficiency of *Agrobacterium* strain on *Agrobacterium* strain.

18.  $\frac{1}{2} \times \frac{1}{2} = \frac{1}{4}$

[illegible]

— 20 —

0

*(continued)*

[illegible]

10. *Chlorophyll *a** and *Chlorophyll *b** were determined by the method of Arar and Collins (1971). The concentration of chlorophylls was expressed in  $\mu\text{g mL}^{-1}$  of the sample.

[illegible]

*(continued)*

Figure 1. The effect of the number of trials on the number of correct responses. The number of correct responses was plotted against the number of trials for each condition. The number of correct responses increased with the number of trials for all conditions. The number of correct responses was highest for the condition with the highest number of trials (10 trials) and lowest for the condition with the lowest number of trials (2 trials).

11

100

1

**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Enclosure 2

Page 8 of 14

**INSERT AND REMOVE INSTRUCTIONS**

| <b>VOLUME 6 CURRENT TECHNICAL SPECIFICATION (CTS) COMPARISON DOCUMENT</b> |   |
|---|---|
| <b>DISCARD</b>  | <b>INSERT</b>   |
| Discussion of Changes ITS 3.9.6 Page 1                                    | Discussion of Changes ITS 3.9.6 Page 1                              |
| None  | Discussion of Changes ITS 3.9.6 Page 2                              |
| Discussion of Changes ITS 3.9.7 Page 2                                    | Discussion of Changes ITS 3.9.7 Page 2                              |
| Discussion of Changes CTS 3/4.9.7 Page 1                                  | Discussion of Changes CTS 3/4.9.7 Page 1                            |
| Discussion of Changes ITS 3.10.4 Pages 2 through 4                        | Discussion of Changes ITS 3.10.4 Pages 2 through 4                  |
| Discussion of Changes ITS 3.10.8 Page 2                                   | Discussion of Changes ITS 3.10.8 Page 2                             |
| Discussion of Changes ITS 3/4.10.5 Page 1                                 | Discussion of Changes CTS 3/4.10.5 Page 1                           |
| Discussion of Changes ITS 3/4.10.6 Page 1                                 | Discussion of Changes CTS 3/4.10.6 Page 1                           |
| Discussion of Changes ITS 4.0 Page 1                                      | Discussion of Changes ITS 4.0 Page 1                                |
| Discussion of Changes ITS 4.0 Page 3                                      | Discussion of Changes ITS 4.0 Page 3                                |
| Discussion of Changes ITS 5.2 Page 4                                      | Discussion of Changes ITS 5.2 Page 4                                |
| Discussion of Changes ITS 5.4 Page 1                                      | Discussion of Changes ITS 5.4 Page 1                                |
| Discussion of Changes ITS 5.4 Page 2                                      | Discussion of Changes ITS 5.4 Page 2                                |
| CTS markup for Specification 5.5 Page 1 of 17 through Page 17 of 17       | CTS markup for Specification 5.5 Page 1 of 21 through Page 21 of 21 |
| Discussion of Changes ITS 5.5 Pages 2 through 4                           | Discussion of Changes ITS 5.5 Pages 2 through 4                     |
| CTS markup for Specification 6.7 Page 1 of 1                              | CTS markup for Specification 6.7 Page 1 of 1                        |
| Discussion of Changes CTS 6.7 Page 1                                      | Discussion of Changes CTS 6.7 Page 1                                |
| Discussion of Changes CTS 6.10 Page 1                                     | Discussion of Changes CTS 6.10 Page 1                               |
| <b>VOLUME 7, NO SIGNIFICANT HAZARDS CONSIDERATION</b>                     |   |
| <b>DISCARD</b>  | <b>INSERT</b>   |
| No Significant Hazards Evaluation ITS 3.3.4.2 Page 1                      | No Significant Hazards Evaluation ITS 3.3.4.2 Page 1                |
| No Significant Hazards Evaluation ITS 3.3.8.1 Page 3                      | No Significant Hazards Evaluation ITS 3.3.8.1 Page 3                |
| None  | No Significant Hazards Evaluation ITS 3.3.8.1 Page 4                |
| No Significant Hazards Evaluation ITS 3.5.1 Page 1                        | No Significant Hazards Evaluation ITS 3.5.1 Page 1                  |
| No Significant Hazards Evaluation ITS 3.6.1.3 Page 11                     | No Significant Hazards Evaluation ITS 3.6.1.3 Page 11               |
| No Significant Hazards Evaluation ITS 3.6.3.2 Page 1                      | No Significant Hazards Evaluation ITS 3.6.3.2 Page 1                |
| No Significant Hazards Evaluation ITS 3.9.1 Page 1                        | No Significant Hazards Evaluation ITS 3.9.1 Page 1                  |

MEMORANDUM

TO : [illegible]

FROM : [illegible]

[The body of the memorandum contains several paragraphs of text that are mostly illegible due to the quality of the scan. The text appears to be a formal report or memorandum, possibly discussing a specific issue or project. There are some faint words and phrases visible, such as "The following information", "It is recommended", and "The results of the study", but the majority of the content cannot be transcribed accurately.]



**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Enclosure 2

Page 9 of 14

**INSERT AND REMOVE INSTRUCTIONS**

| <b>VOLUME 7, NO SIGNIFICANT HAZARDS CONSIDERATION</b>                  |  |
|--|--|
| <b>DISCARD</b>   | <b>INSERT</b>  |
| No Significant Hazards Evaluation ITS 3.9.2 Page 4                     | No Significant Hazards Evaluation ITS 3.9.2 Page 4         |
| No Significant Hazards Evaluation ITS 3.9.2 Page 5                     | No Significant Hazards Evaluation ITS 3.9.2 Page 5         |
| No Significant Hazards Evaluation ITS 3.9.3 Page 2                     | No Significant Hazards Evaluation ITS 3.9.3 Page 2         |
| No Significant Hazards Evaluation ITS 3.9.6 Page 1                     | No Significant Hazards Evaluation ITS 3.9.6 Page 1         |
| No Significant Hazards Evaluation ITS 3.9.7 Page 2                     | No Significant Hazards Evaluation ITS 3.9.7 Page 2         |
| No Significant Hazards Evaluation ITS 3.10.8 Page 1                    | No Significant Hazards Evaluation ITS 3.10.8 Page 1        |
| No Significant Hazards Evaluation ITS 3/4.10.5 Page 1                  | No Significant Hazards Evaluation CTS 3/4.10.5 Page 1      |
| No Significant Hazards Evaluation ITS 3/4.10.6 Page 1                  | No Significant Hazards Evaluation CTS 3/4.10.6 Page 1      |
| <b>VOLUME 8, DEVIATIONS FROM NUREG-1434 (TECHNICAL SPECIFICATIONS)</b> |  |
| <b>DISCARD</b>   | <b>INSERT</b>  |
| 1.1-2 through 1.1-5  | 1.1-2 through 1.1-5  |
| Justification for Deviations Chapter 1.0 Page 1                        | Justification for Deviations Chapter 1.0 Page 1            |
| 2.0-1  | 2.0-1  |
| 2.0-2  | 2.0-2  |
| Justification for Deviations Chapter 2.0 Page 1                        | Justification for Deviations Chapter 2.0 Page 1            |
| 3.1-17   | 3.1-17   |
| 3.3-4  | 3.3-4  |
| 3.3-25   | 3.3-25   |
| Page 3.3-40 through 3.3-45   | Page 3.3-40 through 3.3-45                                 |
| 3.3-56   | 3.3-56   |
| 3.3-61   | 3.3-61   |
| 3.3-81 through 3.3-85  | 3.3-81 through 3.3-85                                      |
| Justification for Deviations Section 3.3 Pages 3 through 6             | Justification for Deviations Section 3.3 Pages 3 through 7 |
| 3.4-2  | 3.4-2  |
| 3.4-9  | 3.4-9  |
| 3.4-11   | 3.4-11   |



1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

1944-1945

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 2

Page 10 of 14

## INSERT AND REMOVE INSTRUCTIONS

| VOLUME 8, DEVIATIONS FROM NUREG-1434 (TECHNICAL SPECIFICATIONS) |  |
|---|--|
| DISCARD   | INSERT   |
| 3.4-13  | 3.4-13   |
| 3.4-26  | 3.4-26   |
| Justification for Deviations Section 3.4 Page 2                 | Justification for Deviations Section 3.4 Page 2            |
| 3.5-1   | 3.5-1  |
| 3.6-2   | 3.6-2  |
| 3.6-7   | 3.6-7  |
| 3.6-13  | 3.6-13   |
| 3.6-17  | 3.6-17   |
| 3.6-18  | 3.6-18   |
| Insert Page 3.6-41a   | Insert Page 3.6-41a  |
| Insert Page 3.6-41b   | Insert Page 3.6-41b  |
| Justification for Deviations Section 3.6 Pages 1 through 6      | Justification for Deviations Section 3.6 Pages 1 through 7 |
| 3.8-15  | 3.8-15   |
| 3.8-20  | 3.8-20   |
| 3.8-21  | 3.8-21   |
| 3.8-24  | 3.8-24   |
| 3.8-25  | 3.8-25   |
| 3.8-28  | 3.8-28   |
| Insert Page for 3.8-28  | Insert Page for 3.8-28                                     |
| 3.8-30  | 3.8-30   |
| Justification for Deviations Section 3.8 Page 4                 | Justification for Deviations Section 3.8 Page 4            |
| Justification for Deviations Section 3.8 Page 5                 | Justification for Deviations Section 3.8 Page 5            |
| 3.9-1   | 3.9-1  |
| Justification for Deviations Section 3.9 Page 1                 | Justification for Deviations Section 3.9 Page 1            |
| 3.10-9  | 3.10-9   |
| Justification for Deviations Section 3.10 Page 1                | Justification for Deviations Section 3.10 Page 1           |
| 5.0-12  | 5.0-12   |



**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Enclosure 2

Page 11 of 14

**INSERT AND REMOVE INSTRUCTIONS**

| <b>VOLUME 8, DEVIATIONS FROM NUREG-1434 (TECHNICAL SPECIFICATIONS)</b> |  |
|--|--|
| <b>DISCARD</b>   | <b>INSERT</b>  |
| 5.0-14   | 5.0-14   |
| 5.0-15   | 5.0-15   |
| 5.0-17   | 5.0-17   |
| None   | Insert Page 5.0-17   |
| 5.0-19   | 5.0-19   |
| Insert Page 5.0-24a  | Insert Page 5.0-24a  |
| Insert Page 5.0-24b  | Insert Page 5.0-24b  |
| Insert Page 5.0-25a  | Insert Page 5.0-25a  |
| Insert Page 5.0-25b  | Insert Page 5.0-25b  |
| Justification for Deviations Chapter 5.0 Page 3                        | Justification for Deviations Chapter 5.0 Page 3            |
| Justification for Deviations Chapter 5.0 Page 4                        | Justification for Deviations Chapter 5.0 Page 4            |
| <b>VOLUME 9, DEVIATIONS FROM NUREG-1434 (BASES)</b>                    |  |
| <b>DISCARD</b>   | <b>INSERT</b>  |
| B 2.0-6  | B 2.0-6  |
| B 2.0-7  | B 2.0-7  |
| B 2.0-9 through B 2.0-11   | B 2.0-9 through B 2.0-11                                   |
| Justification for Deviations from Bases Chapter 2.0 Page 1             | Justification for Deviations from Bases Chapter 2.0 Page 1 |
| B 3.0-13   | B 3.0-13   |
| None   | Insert Page B 3.0-13                                       |
| Justification for Deviations from Bases Section 3.0 Page 1             | Justification for Deviations from Bases Section 3.0 Page 1 |
| B 3.2-15   | B 3.2-15   |
| B 3.3-4  | B 3.3-4  |
| B 3.3-28   | B 3.3-28   |
| B 3.3-69   | B 3.3-69   |
| B 3.3-127  | B 3.3-127  |
| B 3.3-128  | B 3.3-128  |

$\frac{1}{2} \cdot \frac{1}{2} = \frac{1}{4}$

[illegible]

— 10 —

1. *Chlorophyll a* (Chl *a*)

[illegible]

Figure 1. The effect of the concentration of the  $\text{H}_2\text{O}_2$  solution on the amount of the released  $\text{H}_2$  gas from the  $\text{H}_2$  gas-generating system. The amount of the released  $\text{H}_2$  gas was measured at 25 °C for 10 min. The concentration of the  $\text{H}_2\text{O}_2$  solution was 0.01, 0.02, 0.05, 0.1, 0.2, 0.5, 1, 2, 5, 10, 20, 50, 100, 200, 500, 1000, and 2000 ppm. The amount of the released  $\text{H}_2$  gas was measured at 25 °C for 10 min. The concentration of the  $\text{H}_2\text{O}_2$  solution was 0.01, 0.02, 0.05, 0.1, 0.2, 0.5, 1, 2, 5, 10, 20, 50, 100, 200, 500, 1000, and 2000 ppm.

Figure 1. The effect of the concentration of the *Agrobacterium* suspension on the transformation efficiency of *Agrobacterium* strains.

Figure 1. The effect of the number of trials on the number of correct responses. The number of correct responses was plotted against the number of trials for each condition. The number of correct responses increased with the number of trials for all conditions. The number of correct responses was highest for the condition with the highest number of trials (10 trials) and lowest for the condition with the lowest number of trials (2 trials).

1. The first part of the document is a list of the names of the members of the committee, which is headed by the Chairman, Mr. J. H. ...

of 1

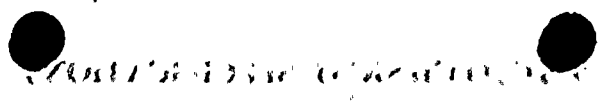
**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Enclosure 2

Page 12 of 14

**INSERT AND REMOVE INSTRUCTIONS**

| <b>VOLUME 9, DEVIATIONS FROM NUREG-1434 (BASES)</b>           |   |
|---|---|
| <b>DISCARD</b>  | <b>INSERT</b>   |
| B 3.3-237   | B 3.3-237   |
| NONE  | Insert Page B 3.3-237   |
| B 3.3-239   | B 3.3-239   |
| B 3.3-241   | B 3.3-241   |
| B 3.3-242   | B 3.3-242   |
| B 3.3-244 through B 3.3-246                                   | B 3.3-244 through B 3.3-246                                   |
| B 3.4-5   | B 3.4-5   |
| B 3.4-24  | B 3.4-24  |
| B 3.4-30  | B 3.4-30  |
| B 3.4-31  | B 3.4-31  |
| B 3.4-37  | B 3.4-37  |
| B 3.4-45  | B 3.4-45  |
| B 3.4-47  | B 3.4-47  |
| B 3.4-50  | B 3.4-50  |
| B 3.4-58  | B 3.4-58  |
| Justification for Deviations from Bases Section 3.4<br>Page 1 | Justification for Deviations from Bases Section 3.4<br>Page 1 |
| <b>VOLUME 10, DEVIATIONS FROM NUREG-1434 (BASES)</b>          |   |
| <b>DISCARD</b>  | <b>INSERT</b>   |
| B 3.5-4   | B 3.5-4   |
| B 3.5-6   | B 3.5-6   |
| B 3.5-7   | B 3.5-7   |
| B 3.5-14  | B 3.5-14  |
| B 3.6-2   | B 3.6-2   |
| B 3.6-4   | B 3.6-4   |
| B 3.6-5   | B 3.6-5   |
| B 3.6-12  | B 3.6-12  |
| B 3.6-14  | B 3.6-14  |



CONFIDENTIAL - SECURITY INFORMATION

Page 1

1. [Illegible text]

[Illegible text block containing several paragraphs of information]

REPORT

[Illegible text block containing several paragraphs of information]



**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Enclosure 2

Page 13 of 14

**INSERT AND REMOVE INSTRUCTIONS**

| <b>VOLUME 10, DEVIATIONS FROM NUREG-1434 (BASES)</b>          |   |
|---|---|
| <b>DISCARD</b>  | <b>INSERT</b>   |
| B 3.6-17  | B 3.6-17  |
| B 3.6-30 through B 3.6-32                                     | B 3.6-30 through B 3.6-32                                     |
| B 3.6-43  | B 3.6-43  |
| B 3.6-44  | B 3.6-44  |
| Insert Page for B 3.6-47i                                     | Insert Page for B 3.6-47i                                     |
| Insert Page for B 3.6-86a through B 3.6-86f                   | Insert Page for B 3.6-86a through B 3.6-86f                   |
| Justification for Deviations from Bases Section 3.6<br>Page 2 | Justification for Deviations from Bases Section 3.6<br>Page 2 |
| B 3.8-22  | B 3.8-22  |
| Insert Page for B 3.8-22                                      | Insert Page for B 3.8-22                                      |
| B 3.8-23  | B 3.8-23  |
| Insert Page for B 3.8-23                                      | Insert Page for B 3.8-23                                      |
| B 3.8-28  | B 3.8-28  |
| Insert Page for B 3.8-28                                      | Insert Page for B 3.8-28                                      |
| B 3.8-50  | B 3.8-50  |
| B 3.8-56  | B 3.8-56  |
| Insert Page for B 3.8-56                                      | Insert Page for B 3.8-56                                      |
| B 3.8-59  | B 3.8-59  |
| B 3.9-2   | B 3.9-2   |
| B 3.9-3   | B 3.9-3   |
| B 3.9-19  | B 3.9-19  |
| B 3.9-25  | B 3.9-25  |
| B 3.9-29  | B 3.9-29  |
| Insert Page for B 3.10-10                                     | Insert Page for B 3.10-10                                     |
| B 3.10-18   | B 3.10-18   |
| B 3.10-36   | B 3.10-36   |



**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Enclosure 2

Page 14 of 14

**INSERT AND REMOVE INSTRUCTIONS**

| <b>VOLUME 10, DEVIATIONS FROM NUREG-1434 (BASES)</b>           |  |
|--|--|
| <b>DISCARD</b>   | <b>INSERT</b>  |
| B 3.10-37  | B 3.10-37  |
| Justification for Deviations from Bases Section 3.10<br>Page 1 | Justification for Deviations from Bases Section 3.10<br>Page 1 |

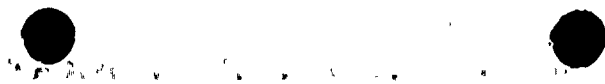
# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 3

Page 1 of 11

## RELOCATED ITEMS

| ITS         | DOC  | Current Tech Spec   | New Location (Revision A) |
|-------------|------|---|---------------------------|
| 1.0         | LA.1 | 1.15  | Bases 3.2.4               |
|             | LA.2 | 1.31a   | Bases 3.6.1.1 and 3.6.1.2 |
| 2.0         | LA.1 | 2.1.4   | plant procedures (EOPs)   |
|             | LA.2 | 6.7.1.b   | plant procedures          |
| 3.1.2       | LA.1 | 3.1.2.action a  | Bases                     |
| 3.1.3       | LA.1 | 3.1.3.1.a.1.b.1 & 2, 3.1.3.1.b.2.a & b, 3.1.3.7.a.3.b     | Bases                     |
|             | LA.2 | 3.1.3.7.a.1 & 2   | Bases                     |
| 3.1.4       | LA.1 | 4.1.3.2.c   | Bases                     |
| 3.1.5       | LA.1 | 3.1.3.5.a.2.b.1 & 2                                       | Bases                     |
|             | LC.1 | 4.1.3.5.b   | plant procedures          |
| 3.1.7       | LA.1 | 4.1.5.d   | plant procedures          |
|             | LA.2 | 4.1.5.d.1   | Bases                     |
|             | LA.3 | 4.1.5.d.1, 4.1.5.d.3                                      | Bases                     |
|             | LA.4 | 4.1.5.d.2   | IST Program               |
|             | LA.5 | Figure 3.1.5-2  | Bases and FSAR            |
| NA          | LA.1 | 3/4.1.6   | COLR                      |
| 3.2.1,2,3,4 | LA.1 | 3.2.1.a, 3.2.3.a, 3.2.4.a, 3.2.2.a                        | Bases                     |
| 3.2.4       | R.1  | 3.2.2.a   | LCS                       |
|             | LA.2 | 4.2.2.*   | plant procedures          |
| 3.3.1.1     | LA.1 | 4.3.1.2,<br>Table 4.3.1.1-1                               | Bases                     |
|             | LA.2 | 4.3.1.3.* & **  | Bases                     |
|             | LA.3 | Table 3.3.1-1.1.a,<br>Table 3.8.1-1.b,<br>Table 3.3.1-1.* | plant procedures          |
|             | LA.4 | Table 3.3.1-1.2,<br>Table 3.3.1-1.c                       | Bases                     |



# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 3

Page 2 of 11

## RELOCATED ITEMS

| ITS     | DOC  | Current Tech Spec  | New Location (Revision A) |
|---------|------|--|---------------------------|
| 3.3.1.1 | LA.5 | Table 3.3.1-1.5,6,8,9<br>Table 3.3.1-1.e<br>Table 3.3.1-1.d<br>Table 3.3.1-1.g<br>Table 3.3.1-1.i<br>Table 3.3.1-1.j | FSAR                      |
|         | LA.6 | Table 4.3.1.1-1.h  | plant procedures          |
|         | LA.7 | 2.2, Table 3.3.1.1-1   | plant procedures          |
| 3.3.1.2 | LA.1 | 4.3.7.6.c  | Bases                     |
|         | LA.2 | 3.9.2.a, 4.9.2.a.2   | Bases                     |
|         | LA.3 | 3.9.2.d, 4.9.2.d   | plant procedures          |
| 3.3.2.1 | LA.1 | 3.3.6, 3.3.6.a,<br>Table 3.3.6-2.1, 3.3.4.1  | plant procedures          |
|         | R.1  | Table 3.3.6-1<br>Table 4.3.6-1<br>Table 3.3.6.2  | LCS                       |
|         | LA.2 | Table 3.3.6-1  | FSAR                      |
|         | LA.3 | Table 3.3.6-1, 4.1.4.a,b,c   | Bases                     |
| 3.3.2.2 | LA.1 | 3.3.9, Table 3.3.9-2   | plant procedures          |
| 3.3.3.1 | R.1  | Table 3.3.7.5-1,<br>Table 4.3.7.5-1  | FSAR                      |
|         | LA.1 | Table 3.3.7.5-1  | Bases                     |
|         | LA.2 | Table 4.3.7.5-1  | Bases                     |
| 3.3.3.2 | LA.1 | 3.3.7.4, 3.3.2.4.a, 4.3.7.4, Table<br>3.3.7.1-1,<br>Table 4.3.7.4-1  | LCS and Bases             |
| 3.3.4.1 | LA.1 | 3.3.4.2, 3.3.4.2.a,<br>Table 3.3.4.2-2   | plant procedures          |
|         | LA.2 | 3.3.4.2, 4.3.4.2.3,<br>Table 3.3.4.2-3   | LCS                       |
|         | LA.3 | Table 3.3.4.2-1  | FSAR                      |



# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 3

Page 3 of 11

## RELOCATED ITEMS

| ITS     | DOC  | Current Tech Spec  | New Location (Revision A) |
|---------|------|--|---------------------------|
| 3.3.4.2 | LA.1 | 3.3.4.1, 3.3.4.1.a,<br>Table 3.3.4.1-2                   | plant procedures          |
| 3.3.5.1 | LA.1 | 3.3.3, 3.3.3.a,<br>Table 3.3.3-2                         | plant procedures          |
|         | LA.2 | 4.3.3.2  | Bases                     |
|         | LA.3 | Table 3.3.3-1,<br>Table 3.3.3-2,<br>Table 4.3.3.1-1      | Bases                     |
|         | R.1  | Table 4.3.3.1-1,2.f                                      | FSAR                      |
| 3.3.5.2 | LA.1 | 3.3.5, 3.3.5.a,<br>Table 3.3.5-2                         | plant procedures          |
|         | LA.2 | 4.3.5.2  | Bases                     |
|         | LA.3 | Table 3.3.5-1,<br>Table 3.3.5-2                          | Bases                     |
| 3.3.6.1 | R.1  | Table 3.3.2-1.h,<br>Table 3.3.2-2.h<br>Table 4.3.2.1-1.h | FSAR                      |
|         | LA.1 | 3.3.2, 3.3.2.a,<br>Table 3.3.2-2                         | plant procedures          |
|         | LA.2 | 3.3.2.b.1, 3.3.2.b.2, 3.3.2.b.2.c                        | Bases                     |
|         | LA.3 | 3.3.2.*  | Bases                     |
|         | LA.4 | 4.3.2.2  | Bases                     |
|         | LA.5 | Table 3.3.2-1  | Bases                     |
|         | LA.6 | Table 4.3.2.1-1  | plant procedures          |
|         | LA.7 | Table 3.3.2-1.i  | plant procedures          |
| 3.3.6.2 | LA.1 | 3.3.2, 3.3.2.a,<br>Table 3.3.2-2                         | plant procedures          |
|         | LA.2 | 3.3.2.b.1, 3.3.2.b.2, 3.3.2.b.2.b                        | Bases                     |
|         | LA.3 | 3.3.2.*  | Bases                     |
|         | LA.4 | 4.3.3.2  | Bases                     |
|         | LA.5 | Table 3.3.2-1  | Bases                     |





# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 3

Page 4 of 11

## RELOCATED ITEMS

| ITS               | DOC  | Current Tech Spec   | New Location (Revision A)                                   |
|-------------------|------|---|---|
| 3.3.7.1           | LA.1 | 3.3.7.1-1   | plant procedures  |
| 3.3.8.1           | LA.1 | 3.3.3, 3.3.3.a,<br>Table 3.3.8.1-1  | plant procedures  |
| 3.3.8.1           | LA.2 | 4.3.3.2   | Bases   |
|                   | LA.3 | Table 3.3.8.1-1   | Bases   |
|                   | LA.4 | Table 3.3.8.1-1   | plant procedures  |
| 3/4.3.7.1<br>CTS  | R.1  | 3.3.7.1, 3.3.7.1-1, 4.3.7.1, Table<br>3.3.7.1-1   | FSAR  |
| 3/4.3.7.3<br>CTS  | R.1  | 3.3.7.3, 4.3.7.3,<br>Table 3.3.7.3-1  | FSAR  |
| 3/4.3.7.7<br>CTS  | R.1  | 3.3.7.7, 4.3.7.7  | FSAR  |
| 3/4.3.7.10<br>CTS | R.1  | 3.3.7.10, 4.3.7.10  | FSAR  |
| 3/4.3.7.12<br>CTS | R.1  | 3.3.7.12, 4.3.7.12,<br>Table 3.3.7.12-1   | a: plant procedures<br>b: FSAR<br>Action = plant procedures |
| 3/4.3.8<br>CTS    | R.1  | 3.3.8, 4.3.8.1, 4.3.8.2   | LCS   |
| 3.4.1             | LA.1 | 3.4.1.1.2   | Bases   |
|                   | LA.2 | 3.4.1.1.2, 3.2.7, 3.2.7.b, 3.2.8.a,<br>3.2.8.b  | Bases   |
|                   | LA.3 | 3.4.1.1.3.a, 3.4.1.1.3.d,<br>4.4.1.1.1.a, 4.4.1.1.1.b   | plant procedures and FSAR                                   |
|                   | LA.4 | 3.4.1.1.2, 4.4.1.1.1.c, Figure<br>3.4.1.1-1, 3.2.6, 4.2.6, Figure<br>3.2.6-1, 3.2.7, Figure 3.2.7-1,<br>3.2.8, Figure 3.2.8-1 | COLR  |
|                   | LA.5 | 3.2.6   | Bases   |
|                   | LA.6 | 3.2.7, 3.2.7.a, 3.2.8, 3.2.8.a  | Bases   |
|                   | LA.7 | 3.2.7.a, 3.2.7.b, 3.2.8.a, 3.2.8.b  | Bases   |
| 3.4.4             | LA.1 | 3.4.2.*   | Bases   |

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 3

Page 5 of 11

## RELOCATED ITEMS

| ITS            | DOC  | Current Tech Spec   | New Location (Revision A) |
|----------------|------|---|---------------------------|
| 3.4.5          | LA.1 | 3.4.2.*   | Bases                     |
| 3.4.6          | LA.1 | 4.4.3.2.1.a & b   | Bases                     |
| 3.4.7          | LA.1 | 3.4.3.2.e, 4.4.3.2.2,<br>Table 3.4.3.2-1                        | LCS                       |
| 3.4.7          | LA.2 | 4.4.3.2.2.a   | IST Plan                  |
|                | LC.1 | 3.4.3.2.Action d, 4.4.3.2.3,<br>Table 3.4.3.2-2                 | LCS                       |
| 3.4.9          | LA.1 | Table 4.4.5-1   | plant procedures          |
| 3.4.10         | LA.1 | 3.4.9.1.a & b   | Bases                     |
| 3.4.11         | LA.1 | 3.4.9.2.a & b   | Bases                     |
| 3.4.12         | LA.2 | 4.4.1.1.2.***   | Bases                     |
|                | LA.3 | 3.4.1.4.b, 3.4.1.4.action                                       | plant procedures          |
| 3/4.4.4<br>CTS | R.1  | 3.4.4, 4.4.4,<br>Table 3.4.4-1                                  | plant procedures          |
| 3/4.4.8<br>CTS | R.1  | 3.4.8, 4.4.8  | FSAR                      |
| 3.5.1          | LA.1 | 3.5.1.a.1 & 2, 3.5.1.b.1, 3.5.1.c                               | Bases                     |
|                | LA.2 | 4.5.1.a.1 & 2,<br>4.5.1.b.1-3, 4.5.1.c, 4.5.1.d,<br>4.5.1.e.3.b | Bases                     |
|                | LC.1 | 4.5.1.e.2, 4.5.1.e.3.c  | plant procedures          |
|                | LC.2 | 4.5.1.e.3.d   | plant procedures          |
| 3.5.2          | LA.1 | 3.5.2, 3.5.3.b.4  | Bases                     |
|                | LA.2 | 3.5.2, 3.5.3.b.3  | Bases                     |
| 3.5.3          | LA.1 | 3.7.3   | Bases                     |
|                | LA.2 | 4.7.3.a.1, 4.7.3.a.3, 4.9.3.c.1,<br>4.7.3.c.3                   | Bases                     |
| 3.6.1.1        | LA.1 | 3.6.1.2.b, 4.6.1.2.*  | LCS                       |
| 3.6.1.2        | LA.1 | 3.6.1.3.b   | Bases                     |

SECRET

51  
13

SECRET

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 3

Page 6 of 11

## RELOCATED ITEMS

| ITS     | DOC  | Current Tech Spec   | New Location (Revision A) |
|---------|------|---|---------------------------|
| 3.6.1.3 | LA.1 | 3.6.3, 3.6.3.a, 3.6.3.b, 4.6.3.1, 4.6.3.2, 4.6.3.3, 4.6.3.4, Table 3.6.3.1, 4.6.1.1.b | LCS                       |
|         | LA.2 | 4.6.3.5.b   | Bases                     |
|         | LA.3 | 4.6.1.1.**  | plant procedures          |
| 3.6.1.4 | LA.1 | 4.6.1.7   | Bases                     |
| 3.6.1.5 | R.1  | 3.6.2.2.Action a & b, 4.6.2.2, 4.6.2.2.b  | LCS                       |
|         | LA.1 | 3.6.2.2   | Bases                     |
|         | LA.2 | 4.6.2.2.c   | Bases                     |
| 3.6.1.6 | LA.1 | 3.6.4.2   | Bases                     |
|         | LA.2 | 4.6.4.2.b.2.b   | plant procedures          |
| 3.6.1.7 | LA.1 | 3.6.4.1   | Bases                     |
| 3.6.1.8 | LA.1 | 3.6.1.4   | Bases                     |
|         | LA.2 | 4.6.1.4.a.1 & 2, 4.6.1.4.c  | Bases                     |
|         | LA.3 | 4.6.1.4.b   | IST Program               |
|         | LC.1 | 4.6.1.4.d   | plant procedures          |
| 3.6.2.1 | LA.1 | 3.6.2.1.Action b.2.b  | plant procedures          |
| 3.6.2.2 | LA.1 | 3.6.2.1.a.1, 3.5.3.a  | Bases                     |
| 3.6.2.3 | LA.1 | 3.6.2.3   | Bases                     |
| 3.6.3.1 | LA.1 | 3.6.6.1   | Bases                     |
|         | LA.2 | 4.6.6.1.b.2, 4.6.6.1.b.3, 4.6.6.1.b.4   | Bases                     |
|         | LC.1 | 4.6.6.1.b.1   | plant procedures          |
| 3.6.4.2 | LA.1 | 3.6.5.2, 3.6.5.2.Action, Table 3.6.5.2-1  | LCS                       |
| 3.6.4.3 | LA.1 | 3.6.5.3   | Bases                     |
|         | LA.2 | 4.6.5.3.a   | Bases                     |
| 3.7.1   | LA.1 | 3.7.1.1, 3.7.1.3  | Bases                     |

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 3

Page 7 of 11

## RELOCATED ITEMS

| ITS            | DOC  | Current Tech Spec  | New Location (Revision A)    |
|----------------|------|--|------------------------------|
| 3.7.1          | LA.2 | 3.7.1.1,<br>3.7.1.1.Action b, c & d,<br>3.7.1.1.*, 3.7.1.3, 3.7.1.3.Action<br>b & c, 3.7.1.3.* | Bases                        |
| 3.7.2          | LA.1 | 3.7.2.1  | Bases                        |
|                | LA.2 | 3.7.1.2, 3.7.1.2.Action  | Bases                        |
| 3.7.3          | LA.1 | 3.7.2  | Bases                        |
| 3.7.3          | LA.2 | 4.7.2.b  | Bases                        |
| 3.7.5          | LA.1 | 3.11.2.7, 4.11.2.7.2, 4.11.2.7.2.b   | Bases                        |
|                | LA.2 | 4.11.2.7.1   | ODCM                         |
| 3.7.6          | LA.1 | 4.7.9.b.1, 4.7.9.b.2   | Bases and plant procedures   |
|                | LA.2 | 4.7.9.b.3  | LCS                          |
| 3.7.7          | LA.1 | 3.9.9.Action   | plant procedures and<br>FSAR |
|                | LA.2 | 3.9.9.Action   | Bases                        |
| 3/4.7.4<br>CTS | LA.1 | 3.7.4, 4.7.4, Table 4.7-1, Figure<br>4.7-1   | LCS                          |
| 3/4.7.5<br>CTS | R.1  | 3.7.5, 4.7.5.1, 4.7.5.2, 4.7.5.3   | plant procedures             |
| 3/4.7.8<br>CTS | R.1  | 3.7.8, 4.7.8,<br>Table 3.7.8-1   | LCS                          |
| 3.8.1          | LA.1 | 3.8.1.1.a, 3.8.1.1.b   | Bases                        |
|                | LA.2 | 4.8.1.1.2.a,<br>Table 4.8.1.1.2-1  | plant procedures             |
|                | LA.3 | 4.8.1.1.2.a.4, 4.8.1.1.2.a.6   | plant procedures             |
|                | LA.4 | 4.8.1.1.2.e.1  | plant procedures             |
|                | LA.5 | 4.8.1.1.2.e.2, 4.8.1.1.2.e.9   | Bases                        |
|                | LA.6 | 4.8.1.1.2.e.4.2, 4.8.1.1.2.e.6.a.2,<br>4.8.1.1.2.e.6.b.2                                       | Bases                        |
|                | LA.7 | 4.8.1.1.2.e.8  | plant procedures             |
|                | LA.8 | 4.8.1.1.2.e.13   | plant procedures             |

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 3

Page 8 of 11

## RELOCATED ITEMS

| ITS           | DOC  | Current Tech Spec   | New Location (Revision A) |
|---------------|------|---|---------------------------|
| 3.8.2         | LA.1 | 3.8.1.2.Action a  | plant procedures          |
| 3.8.3         | LA.1 | 4.8.1.1.2.g   | plant procedures          |
| 3.8.4         | LA.1 | 3.8.2.1.a.1, 2, 4 & 5, 3.8.2.1.b.1 & 3, 3.8.2.1.c   | Bases                     |
|               | LA.2 | 3.8.2.1.a.3 & 6, 3.8.2.1.b.2 & 4, 4.8.2.1, 4.8.2.1.b, 4.8.2.1.b.3, 4.8.2.1.c.4.1, 4.8.2.1.d.2 | plant procedures          |
| 3.8.4         | LA.3 | 4.8.2.1.b.2, 4.8.2.1.c.3  | Bases                     |
| 3.8.4         | LA.4 | 4.8.2.1.c.4.2   | Bases                     |
|               | LA.5 | 4.8.2.1.d.1 & 2   | FSAR                      |
|               | LA.6 | 4.8.2.1.f   | Bases                     |
| 3.8.5         | LA.1 | 3.8.2.2, 3.8.2.2.a.1, 2, 4 & 5, 3.8.2.2.b.1 & 3, 3.8.2.2.c                                    | Bases                     |
|               | LA.2 | 3.8.2.2.a.3 & 6, 3.8.2.2.b.2 & 4  | plant procedures          |
| 3.8.6         | LA.1 | 4.8.2.1, 4.8.2.1.b, 4.8.2.1.b.3   | plant procedures          |
|               | LA.2 | 4.8.2.1.b.3   | Bases                     |
| 3.8.7         | LA.1 | 3.8.3.1, 3.8.3.1.a, 3.8.3.1.b.1.a - g & i, 3.8.3.1.b.2.a - e, 3.8.3.1.b.3                     | Bases                     |
|               | LA.2 | 3.8.3.1.b.1.h, 3.8.3.1.b.2.f  | plant procedures          |
|               | LA.3 | 4.8.3.1   | Bases                     |
| 3.8.8         | LA.1 | 3.8.3.2.a.1-3, 3.8.3.2.b.1-3  | Bases                     |
|               | LA.2 | 4.8.3.2   | Bases                     |
| 3/4.8.4.1 CTS | R.1  | 3.8.4.1, 4.8.4.1  | plant procedures          |
| 3/4.8.4.2 CTS | R.1  | 3.8.4.2, 4.8.4.2, Table 3.8.4.2-1   | FSAR                      |
| 3/4.8.4.3 CTS | R.1  | 3.8.4.3, 4.8.4.3, Table 3.8.4.3-1   | FSAR                      |
| 3.9.5         | LC.1 | 4.1.3.5.b.1   | plant procedures          |

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 3

Page 9 of 11

## RELOCATED ITEMS

| ITS            | DOC  | Current Tech Spec               | New Location (Revision A)      |
|----------------|------|---------------------------------|--------------------------------|
| 3.9.6          | LA.1 | 3.9.8.Action                    | Bases                          |
| 3.9.7          | LA.1 | 3.9.8.Action                    | Bases                          |
| 3.9.8          | LA.1 | 3.9.11.1.a & b                  | Bases                          |
|                | LA.2 | 4.9.11.1                        | Bases                          |
| 3.9.9          | LA.1 | 3.9.11.2.a & b                  | Bases                          |
|                | LA.2 | 4.9.11.2                        | Bases                          |
| 3/4.9.4<br>CTS | R.1  | 3.9.4, 4.9.4                    | plant procedures               |
| 3/4.9.5<br>CTS | R.1  | 3.9.5, 4.9.5                    | plant procedures               |
| 3/4.9.6<br>CTS | R.1  | 3.9.6, 4.9.6                    | LCS                            |
| 3/4.9.7<br>CTS | R.1  | 3.9.7, 4.9.7,<br>Figure 3.9.7-1 | FSAR and plant procedures      |
| 3.10.1         | LA.1 | 3.10.7                          | plant procedures               |
| 3.10.2         | LA.1 | Table 1.2, 4.9.1.2.*            | Bases                          |
| 3.10.4         | LA.1 | 3.9.10.1.d, 4.9.10.1.d          | Bases                          |
| 3.10.5         | LA.1 | 3.9.10.1.d, 4.9.10.1.d          | Bases                          |
| 4.0            | LA.1 | 5.1.2, 5.1.3, 5.4               | FSAR                           |
|                | LA.2 | 5.2, 5.3.1                      | FSAR                           |
|                | LA.3 | 5.3.1                           | FSAR                           |
|                | LA.4 | 5.5                             | FSAR                           |
| 5.2            | LA.1 | 6.2.1.e                         | FSAR (OQAPD)                   |
|                | LA.2 | 6.2.2.a, Table 6.2.2-1          | FSAR                           |
|                | LA.3 | 6.2.2.c, 6.2.2.*                | plant procedures               |
|                | LA.3 |                                 | Fire Protection Plan<br>(FSAR) |
|                | LA.4 | 6.2.2.d                         | plant procedures               |
|                | LA.5 | 6.2.2.f                         | FSAR                           |





1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

25

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 3

Page 10 of 11

## RELOCATED ITEMS

| ITS      | DOC  | Current Tech Spec                                  | New Location (Revision A)         |
|----------|------|--|-----------------------------------|
| 5.2      | LA.6 | 6.2.3  | FSAR (OQAPD)                      |
| 5.3      | LA.1 | 6.3.1  | FSAR                              |
| 5.4      | LA.1 | 6.8.2, 6.8.3                                       | FSAR (OQAPD)                      |
| 5.5      | LA.1 | 6.8.4.b  | FSAR                              |
|          |      |  | Training Program                  |
|          |      |  | plant Chemistry and HP procedures |
|          | LA.2 | 6.8.4.e  | ODCM                              |
|          | LA.3 | 5.7.1, Table 5.7.1-1                               | FSAR                              |
|          | LA.4 | 4.0.5, 4.0.5.a, 4.0.5.b, 4.0.5.c, 4.0.5.d, 4.0.5.f | ISI Program                       |
|          | LA.5 | 4.0.5.a  | IST Program                       |
|          | LA.6 | 4.6.5.3.b.2 and c<br>4.7.2.c.2 and d               | plant procedures                  |
|          | LA.7 | 3.11.1.4, 4.11.1.4, 3.11.2.6, 4.11.2.6             | plant procedures                  |
|          | LA.8 | 4.8.1.1.2.c and d                                  | Bases                             |
| 5.6      | LA.1 | 6.9.1.1, 6.9.1.2, 6.9.1.3                          | FSAR                              |
| CTS 6.4  | LA.1 | 6.4  | FSAR                              |
| CTS 6.5  | LA.1 | 6.5  | FSAR (OQAPD)                      |
| CTS 6.6  | LA.1 | 6.6.1.a  | plant procedures                  |
|          | LA.2 | 6.6.1.b  | FSAR (OQAPD)                      |
| CTS 6.10 | LA.1 | 6.10   | FSAR                              |
| CTS 6.11 | LA.1 | 6.11   | FSAR                              |
| CTS 6.13 | LA.1 | 6.13, 1.33   | FSAR                              |

1. The first part of the document is a list of names and addresses, which are arranged in two columns. The names are written in a cursive script, and the addresses are written in a more formal, printed style. The list includes names such as "John Doe" and "Jane Smith", and addresses such as "123 Main Street" and "456 Elm Street".

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 3

Page 11 of 11

## RELOCATED ITEMS

Control Process for the documents:

| <u>Document</u> | <u>Process</u>                  |
|-----------------|---------------------------------|
| Bases           | Bases Control Program (ITS 5.5) |
| FSAR            | 10CFR50.59                      |
| OQAPD           | 10CFR50.54(a)(3)                |
| Procedures      | 10CFR50.59                      |
| IST Program     | 10CFR50.55a(f)                  |
| COLR            | 10CFR50.59                      |
| LCS             | 10CFR50.59                      |
| ODCM            | ITS 5.5                         |



# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 4

Page 1 of 4

## FSAR REFERENCE

| Spec #  | DOC  | CTS #  | New Location (from<br>submittal DOC) | FSAR reference                      |
|---------|------|--|--------------------------------------|-------------------------------------|
| 2.0     | LA.1 | 2.1.4  | plant procedures (EOPs)              | 6.2, 6.3, 15.6.4, 15.6.5,<br>15.6.6 |
|         | LA.2 | 6.7.1.b                                      | plant procedures                     | 13.4.1                              |
| 3.1.5   | LC.1 | 4.1.3.5.b                                    | plant procedures                     | 3.1.2.3.2.1                         |
| 3.1.7   | LA.1 | 4.1.5.d                                      | plant procedures                     | Table 9.3-3(b)                      |
| 3.2.4   | LA.2 | 4.2.2.*                                      | plant procedures                     | 7.2.2.3                             |
| 3.3.1.1 | LA.3 | Table 3.3.1-1.1.a,<br>Table 3.3.1-1.Note (b) | plant procedures                     | 7.2.1.1                             |
|         | LA.6 | Table 4.3.1.1-1.h                            | plant procedures                     | Table 7.2-5                         |
|         | LA.7 | 2.2, Table 3.3.1.1-1                         | plant procedures                     | 7.2.1.2                             |
| 3.3.1.2 | LA.3 | 3.9.2.d, 4.9.2.d                             | plant procedures                     | 7.2.1.1                             |
| 3.3.2.1 | LA.1 | 3.3.6, 3.3.6.a,<br>Table 3.3.6-2.1, 3.3.4.1  | plant procedures                     | 7.7.1.2                             |
| 3.3.2.2 | LA.1 | 3.3.9, Table 3.3.9-2                         | plant procedures                     | 6.A.3.1.1.2                         |
| 3.3.4.1 | LA.1 | 3.3.4.2, 3.3.4.2.a,<br>Table 3.3.4.2-2       | plant procedures                     | 7.6.1.5                             |
| 3.3.4.2 | LA.1 | 3.3.4.1, 3.3.4.1.a,<br>Table 3.3.4.1-2       | plant procedures                     | 7.4.1.5                             |
| 3.3.5.1 | LA.1 | 3.3.3, 3.3.3.a,<br>Table 3.3.3-2             | plant procedures                     | 3.1.2.4                             |



# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 4

Page 2 of 4

## FSAR REFERENCE

| Spec #         | DOC  | CTS #   | New Location (from submittal DOC) | FSAR reference   |
|----------------|------|---|-----------------------------------|------------------|
| 3.3.5.2        | LA.1 | 3.3.5, 3.3.5.a,<br>Table 3.3.5-2                      | plant procedures                  | 3.6.1.18         |
| 3.3.6.1        | LA.1 | 3.3.2, 3.3.2.a,<br>Table 3.3.2-2                      | plant procedures                  | 3.6.1.18         |
|                | LA.6 | Table 4.3.2.1-1                                       | plant procedures                  | 7.3.1.1.2        |
|                | LA.7 | Table 3.3.2-1.i                                       | plant procedures                  | 7.4.1.4          |
| 3.3.6.2        | LA.1 | 3.3.2, 3.3.2.a,<br>Table 3.3.2-2                      | plant procedures                  | 15.6.5<br>15.7.4 |
| 3.3.7.1        | LA.1 | 3.3.7.1-1   | plant procedures                  | 3.1.2.2.10.1     |
| 3.3.8.1        | LA.1 | 3.3.3, 3.3.3.a,<br>Table 3.3.8.1-1                    | plant procedures                  | 6.2.1.1          |
|                | LA.4 | Table 3.3.8.1-1                                       | plant procedures                  | 8.3.1.1.5        |
| 3.4.1          | LA.3 | 3.4.1.1.3.a, 3.4.1.1.3.d,<br>4.4.1.1.1.a, 4.4.1.1.1.b | plant procedures and FSAR         | 6.A.1            |
| 3.4.9          | LA.1 | Table 4.4.5-1   | plant procedures                  | 11.3.2.4.5       |
| 3.4.12         | LA.3 | 3.4.1.4.b, 3.4.1.4.action                             | plant procedures                  | 6.A.1            |
| 3/4.4.4<br>CTS | R.1  | 3.4.4, 4.4.4,<br>Table 3.4.4-1                        | plant procedures                  | 3.11.5.1         |
| 3.5.1          | LC.2 | 4.5.1.e.3.d   | plant procedures                  | 6.3.2.2          |
|                | LC.1 | 4.5.1.e.2, 4.5.1.e.3.c                                | plant procedures                  | Table 6.2-16     |
| 3.6.1.3        | LA.3 | 4.6.1.1.**  | plant procedures                  | 3.6.2.5.4.8.a    |





# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 4

Page 3 of 4

## FSAR REFERENCE

| Spec #         | DOC  | CTS #   | New Location (from submittal DOC) | FSAR reference |
|----------------|------|---|-----------------------------------|----------------|
| 3.6.1.6        | LA.2 | 4.6.4.2.b.2.b   | plant procedures                  | 6.2.1.1.4      |
| 3.6.1.8        | LC.1 | 4.6.1.4.d   | plant procedures                  | 7.3.1.1.3      |
| 3.6.2.1        | LA.1 | 3.6.2.1.Action b.2.b  | plant procedures                  | 1.2.2.4        |
| 3.6.3.1        | LC.1 | 4.6.6.1.b.1   | plant procedures                  | 6.2.5          |
| 3.7.7          | LA.1 | 3.9.9.Action  | plant procedures and FSAR         | 9.1.2.3.3      |
| 3/4.7.5<br>CTS | R.1  | 3.7.5, 4.7.5.1, 4.7.5.2, 4.7.5.3  | plant procedures                  | 12.3.1.4.1     |
| 3.8.1          | LA.3 | 4.8.1.1.2.a.4, 4.8.1.1.2.a.6  | plant procedures                  | Chapter 8      |
|                | LA.4 | 4.8.1.1.2.e.1   | plant procedures                  | Note 1         |
|                | LA.7 | 4.8.1.1.2.e.8   | plant procedures                  | 8.3.1.2.2      |
|                | LA.8 | 4.8.1.1.2.e.13  | plant procedures                  | Note 1         |
| 3.8.2          | LA.1 | 3.8.1.2.Action a  | plant procedures                  | 9.1.4.2.2.2    |
| 3.8.3          | LA.1 | 4.8.1.1.2.g   | plant procedures                  | 8.3.1.1.8.2    |
| 3.8.4          | LA.2 | 3.8.2.1.a.3 & 6, 3.8.2.1.b.2 & 4, 4.8.2.1, 4.8.2.1.b, 4.8.2.1.b.3, 4.8.2.1.c.4.1, 4.8.2.1.d.2 | plant procedures                  | 7.2.1.1        |
| 3.8.5          | LA.2 | 3.8.2.2.a.3 & 6, 3.8.2.2.b.2 & 4  | plant procedures                  | 7.2.1.1        |
| 3.8.6          | LA.1 | 4.8.2.1, 4.8.2.1.b, 4.8.2.1.b.3   | plant procedures                  | 8.3.2.1.7.1    |

Note 1: FSAR revision will be required

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Enclosure 4

Page 4 of 4

## FSAR REFERENCE

| Spec #           | DOC  | CTS #                                | New Location (from submittal DOC) | FSAR reference                       |
|------------------|------|--------------------------------------|-----------------------------------|--------------------------------------|
| 3.8.7            | LA.2 | 3.8.3.1.b.1.h, 3.8.3.1.b.2.f         | plant procedures                  | 8.3.2.1.3                            |
| 3/4.8.4.1<br>CTS | R.1  | 3.8.4.1, 4.8.4.1                     | plant procedures                  | 3.8.2.2.4.7                          |
| 3/4.8.4.3<br>CTS | R.1  | 3.8.4.3, 4.8.4.3                     | plant procedures                  | 8.3.1.1.10                           |
| 3.9.5            | LC.1 | 4.1.3.5.b.1                          | plant procedures                  | 3.1.2.3.2.1                          |
| 3/4.9.4<br>CTS   | R.1  | 3.9.4, 4.9.4                         | plant procedures                  | 9.1.4.2                              |
| 3/4.9.5<br>CTS   | R.1  | 3.9.5, 4.9.5                         | plant procedures                  | 9.5.2.1                              |
| 3/4.9.7<br>CTS   | R.1  | 3.9.7, 4.9.7, Figure 3.9.7-1         | FSAR and plant procedures         | 9.1.2.3.3                            |
| 3.10.1           | LA.1 | 3.10.7                               | plant procedures                  | LCO 3.4.12                           |
| 5.2              | LA.3 | 6.2.2.c, 6.2.2.*                     | plant procedures                  | 13.1.2.2.5                           |
|                  | LA.4 | 6.2.2.d                              | plant procedures                  | 13.1.2.2.5                           |
| 5.5              | LA.6 | 4.6.5.3.b.2 and c<br>4.7.2.c.2 and d | plant procedures                  | 6.4, 6.5.1, 9.4.1, 15.6.5,<br>15.7.4 |
|                  | LA.7 | 3/4.11.1.4, 3/4.11.2.6               | plant procedures                  | 10.4.2.4                             |
| CTS 6.6          | LA.1 | 6.6.1.a                              | plant procedures                  | 13.4.1                               |



# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Attachment 2

Page 1 of 11

## SURVEILLANCE TEST INTERVAL EXTENSION

As part of the conversion to Improved Technical Specifications (ITS), the Supply System proposed the extension of the 18 month interval to 24 months for surveillance testing. The evaluation to support the proposed extension was performed in accordance with the guidance in Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle." As discussed in GL 91-04, a different method was used to evaluate the proposed extension for instrument calibrations than was used for the other surveillances. This report was prepared to provide additional information to support the extension up to 30 months for other surveillance intervals (non-instrumentation calibrations). The review of the Technical Specifications surveillance procedures was performed to support the development of the ITS and was completed in August 1995.

For each surveillance requirement, available surveillance data from 1990 through 1995 were reviewed to assess functional performance. In addition, during the surveillance testing, a Problem Evaluation Request (PER) was generated upon a discovery of an equipment problem. For those particular test results specified as UNSATISFACTORY or where a PER resulted, the test results were investigated. The review showed that almost every surveillance test was completed satisfactorily. Moreover, the majority of PERs generated as the result of the surveillances were not of major significance with respect to safety function of the investigated equipment.

In addition, the evaluation included equipment maintenance history reviews. The primary data sources for determining the equipment history were the Maintenance Rule Scoping and Performance Criteria documents. These documents summarize the results of a plant system reliability and availability examination. Licensee Event Reports, Passport and the Plant Tracking Log were also used. For each function tested, any equipment problems causing functional failures that occurred during the last two operating cycles (prior to R-11) were investigated. The performance history and trend for the equipment associated with each function was assessed to justify extension of the test interval up to 30 months. Finally, the equipment reliability and availability histories were then compared against the criteria for acceptable performance established in the Maintenance Rule.

Each surveillance reviewed exhibited performance that would justify extension of the test interval to 30 months. Equipment performance data were reviewed for functional failures, especially repetitive failures, and the review weighed performance during the previous two operating cycles more heavily than earlier performance. The equipment performance reviews focussed on establishing that equipment reliability and availability histories indicated that increased surveillance test intervals could be supported. Additional investigation also revealed that, for all but one of the tests which received an unsatisfactory designation, the failure which resulted in the unsatisfactory grade could be expected to have been detected by other surveillance testing which is performed more frequently. In the lone case where a more frequent test of the function did not exist (SECTION 5.5.7, procedure 7.4.7.2.3A), the test failures were the result of procedure performance problems not equipment failures.



# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Attachment 2

Page 2 of 11

## SURVEILLANCE TEST INTERVAL EXTENSION

When the surveillance test procedures were found to have resulted in unsatisfactory performance, an investigation into the causes of the test failures were made in addition to the equipment performance review. A summary of these findings is presented below. The results of these specific investigations reference the applicable current Technical Specification (CTS) and the proposed ITS requirements.

### SECTION 3.3.1 RPS RESPONSE TIME TESTING

#### CTS 4.3.1.3

#### ITS SR 3.3.1.1.15

The evaluation to support the extension of the response time testing for the reactor protection system (RPS) actuation instrumentation consisted of a review of the available historical test results for each loop logic response time surveillance test performed between 1990 and 1995. Each plant procedure generally consists of surveillance of the logic associated with a single instrument loop with three or four tests performed on each loop during the period specified. The number and types for test failures were specifically reviewed. One test failure (procedure 7.4.3.1.3.2.8, CTS Table 3.3.1-1, function 10, performed on 6/12/90) was caused by a sticking solenoid pilot valve. The other failure (procedure 7.4.3.1.3.1.3, CTS Table 3.3.1-1, function 4, performed on 5/5/93) required the recalibration of a process device (instrument). Further investigation found that during the next channel functional test of this instrument, a switch within the device had failed and was replaced. The logic elements used at WNP-2 are typically non-solid state, reliable mechanical relays. There are more frequently performed tests, such as the CFT, that will identify failed components. The recurrence of the failures would not significantly impact the availability of the systems, given a test interval extension up to 30 months, because additional testing which would have discovered the problem is performed with a greater frequency.

Failures were recorded during the performance of the response time testing of the neutron flux high function (procedures 7.4.3.1.3.1, .2, .3, and .4, CTS Table 3.3.1-1, function 2.c). Further investigation revealed that all results found outside the required time could be attributed to the testing method. Subtracting the extra time delay measured from the as found data resulted in the determination that no failures of the circuit to perform the required function within the specified time have occurred. These instruments have fixed time response circuitry with no adjustments. A high degree of confidence in the stability of these circuits is reasonable because the circuit is not adjustable so that any changes will accumulate over time. The data reviewed showed no appreciable, cumulative change in the response time over the 13 years of service. This supports the conclusion that the extension of the test interval up to 30 months is justified.

Based on the results of this evaluation, these failures would not be expected to significantly reduce the availability of the instrumentation loops. It is concluded that the extension of the test interval for the response time tests up to 30 months is justified and would not result in a decrease in safety.



97  
2

2

11

4

1

1

6

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1

1



# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Attachment 2

Page 3 of 11

## SURVEILLANCE TEST INTERVAL EXTENSION

### SECTION 3.3.6 CONTAINMENT ISOLATION RESPONSE TIME TESTING

CTS 4.3.2.3

ITS SR 3.3.6.1.6

The evaluation to support the extension of the response time testing for the containment isolation actuation instrumentation consisted of a review of the available historical test results for each loop logic response time surveillance test performed between 1990 and 1995. Each procedure generally consists of surveillance of the logic associated with a single instrument loop with three or four tests performed on each loop during the period specified. The number and types for test failures were specifically reviewed. Only two were found to have failed the test acceptance criteria.

One test (procedure 7.4.3.2.3.5, CTS Table 3.3.2-1, function 1.c.2, performed 7/2/94) resulted in actual logic actuation time response beyond acceptable limits; a logic relay failed to actuate and was replaced. The second test failure (procedure 7.4.3.2.3.6, CTS Table 3.3.2-1, function 1.c.3) was the result of a problem with the procedure that was corrected by revising the procedure. The logic elements used at WNP-2 are typically non-solid state, reliable mechanical relays. The recurrence of the failures and test interval extension do not impact system availability because additional testing which would have discovered the problem is performed with a greater frequency. Based on the results of this evaluation, these failures would not be expected to significantly reduce the availability of the instrumentation loops. It is concluded that the extension of the test interval for the response time tests up to 30 months is justified and would not result in a decrease in safety.

### SECTION 3.3.8 LOSS OF POWER INSTRUMENTATION

CTS 4.3.3.2

ITS SR 3.3.8.1.3

The surveillance requirement for CTS Table 3.3.3.2, function D, is satisfied by the performance of procedures 7.4.8.1.1.2.5B, 7.4.8.1.1.2.5C, and 7.4.8.1.1.2.6. Several failures were identified during the review of the surveillance test history. However, none of the failures were related to the failure of the logic system functional testing. The individual test failures are discussed in the section applicable to the functional problem.

### SECTION 3.5.1 ECCS OPERATING

CTS 4.5.1.c

ITS SR 3.5.1.5

Plant procedure 7.4.8.1.1.2.7 is performed to satisfy CTS surveillance requirement 4.5.1.c for Division 1 ECCS. On 8/14/91, during the performance of the surveillance, a problem with the surveillance procedure was identified that could have led to water hammer in LPCS. The

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Attachment 2

Page 4 of 11

## SURVEILLANCE TEST INTERVAL EXTENSION

procedure was revised and the test was successfully completed. A second test failure was observed during the performance of the same procedure on 6/6/93. This test failure was the result of the loss of RHR-P-2A discharge pressure and flow indication. The loss of indication was caused by the performance of a different surveillance on the remote shutdown system which resulted in loss of the control room indication during the testing. Procedure 7.4.1.1.2.7 was successfully completed on 6/7/93.

Although failures have been noted in the performance of the procedures necessary to satisfy the surveillance requirement listed, none of the failures were the result of equipment failures. The problems would not impact the availability of the systems given a test interval extension to 30 months. The actual reliability and availability of the systems have been within the performance criteria established for the Maintenance Rule program. The favorable surveillance test history, the performance of additional testing at monthly intervals, and the equipment history justify extension of the surveillance test interval up to 30 months.

### SECTION 3.5.3 RCIC SYSTEM

CTS 4.7.3.c.1, 2, and 3

ITS SRs 3.5.3.4 and 5

Plant procedure 7.4.7.3.6 is performed to satisfy CTS surveillance requirements 4.7.3.c.1, 2, and 3. The procedure also satisfies CTS 4.3.5.2, the LSFT for RCIC. On 7/7/92, during the performance of the procedure, the RCIC system was declared inoperable because an incorrect oil type was found in the pump. The system had demonstrated its ability to meet its requirement two days earlier and no other unsatisfactory test results were seen. The impact of failing to detect this problem during the 18 month surveillance test would not significantly effect RCIC availability because quarterly surveillances are performed that would identify any degradation as a result of the incorrect oil.

During the shutdown for the annual outage, on 4/22/95, the RCIC system was declared inoperable due to the malfunction of the lube oil cooler pressure control valve. The controller was recalibrated and the system was restored during startup testing. The availability of the equipment would not have been impacted by the proposed interval extension, because the quarterly testing would have identified this problem. The equipment history review during the last two operating cycles and prior to July 1995, indicated RCIC was within the performance criteria limits established for the Maintenance Rule. However, since July 1995, RCIC has exceeded its performance criteria limits due to functional failures and exhibited a higher unavailability than expected. RCIC has experienced repetitive failures of RCIC-V-28 due to excessive corrosion and electronic over speed trips. Corrective action for both problems are being implemented. The valve has been replaced with a valve of different material which is not as susceptible to the corrosion induced failure and the electronic trip mechanism will be disabled. The favorable surveillance test history, the additional functional testing performed quarterly, and projected system reliability and availability improvements, justify the extension of the test interval up to 30 months.

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Attachment 2

Page 5 of 11

## SURVEILLANCE TEST INTERVAL EXTENSION

### SECTION 3.6.1.6 REACTOR BUILDING TO SUPPRESSION CHAMBER VACUUM BREAKERS

CTS 4.6.4.2.b.2.a

ITS SR 3.6.1.6.3

Plant procedure 7.4.6.4.2.3 is performed to satisfy CTS surveillance requirement 4.6.4.2.b.2. On 2/2/94, the procedure was performed for CSP-V-7 due to a problem identified during monthly testing. The problem was determined to be a procedural problem involving the pneumatic operator. This problem was resolved by changing the test method. The problem with the operator would not have prevented the vacuum breaker from performing the safety function.

The available surveillance history for the verification of the opening pressure for the containment vacuum breakers was reviewed. All test results were satisfactory and there was no indication of time dependant failures. The equipment history was also determined by reviewing the Maintenance Rule Scoping and Performance Criteria documents. Based on this review it was determined that the interval extension is acceptable.

### SECTION 3.6.3.1 HYDROGEN RECOMBINER SYSTEM

CTS 4.6.6.1.b.2, 3, and 4

ITS SRs 3.6.3.1.1, 2, and 3

Plant procedure 7.4.6.6.1.1 is performed to satisfy CTS surveillance requirement 4.6.6.1.b.2. On 9/9/91, the performance of the surveillance test was suspended due to testing problems encountered. The procedure was successfully performed on 9/10/91. The CAC system availability would not be expected to be significantly impacted if the surveillance test interval is extended to 30 months. Plant procedures 7.4.6.6.1.4 and 7.4.6.6.1.5 are performed to satisfy CTS surveillance requirements 4.6.6.1.b.3 and 4. No failures were identified during the review of the surveillance history. The equipment history review showed no functional failures involving the components tested during the two previous operating cycles. Therefore, the system reliability supports the extension of the test interval CTS 4.6.6.1.b.2, .3, and .4 up to 30 months.

### SECTION 3.7.1 SERVICE WATER

CTS 4.7.1.1.b

ITS SR 3.7.1.5

Plant procedures 7.4.8.1.1.2.7 and 7.4.8.1.1.2.7A are performed to satisfy CTS surveillance requirement 4.7.1.1.b. A review of the surveillance history indicated three failures in the performance of these procedures. The failures were reviewed and determined not related to the Service Water system functions being tested. The failures are discussed in the section applicable to the functional problem (3.5.1 and 3.8.1).



# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Attachment 2

Page 6 of 11

## SURVEILLANCE TEST INTERVAL EXTENSION

### SECTION 3.7.2 HPCS SERVICE WATER

CTS 4.7.1.2.b

ITS SR 3.7.2.2

Plant procedure 7.4.8.1.1.2.8 is performed to satisfy CTS surveillance requirement 4.7.1.2.b. A review of the surveillance history indicated unsuccessful completion of this procedure on 7/4/94. The failure involved the failure of diesel support equipment to start. This equipment problem is discussed in the section applicable to the functional problem (3.8.1). No failures were related to the ability of the HPCS SW system to perform the required safety function.

### SECTION 3.7.3 CREF

CTS 4.7.2

ITS SR 3.7.3.3 and 4

Plant procedure 7.4.7.2.8 is performed to satisfy CTS surveillance requirement 4.7.2.e.2. On 6/17/92, a portion of the procedure was performed on the control room ventilation system to investigate problems with WMA-FN-54B. The test failed because of ongoing maintenance activities on the air handling unit. The test was successfully performed after maintenance was completed on 6/27/92.

On 11/21 and 11/22/94, during performance of this surveillance, WMA-FN-54B failed to develop the required differential pressure. It was discovered that this was a failure due to the lack of integrity of the control room boundary rather than a failure of the control room ventilation system. Corrective actions were taken to assure the boundary integrity. These two failures were the result of personnel error rather than equipment failures.

No repetitive time dependant failure mechanisms were found. The review of the equipment history found no functional failures associated with these systems during the previous 2 operating cycles. The equipment history and the more frequently performed testing justify extension of the test interval up to 30 months.

### SECTION 3.8.1 AC SOURCES OPERATING

CTSs 4.8.1.1.1.b, 4.8.1.1.2.e.2, 4.8.1.1.2.e.3, 4.8.1.1.2.e.4, 4.8.1.1.2.e.5, 4.8.1.1.2.e.6, 4.8.1.1.2.e.7, 4.8.1.1.2.e.8, 4.8.1.1.2.e.10, 4.8.1.1.2.e.11, and 4.8.1.1.2.e.12

ITS SRs 3.8.1.8, 3.8.1.9, 3.8.1.10, 3.8.1.11, 3.8.1.12, 3.8.1.19, 3.8.1.13, 3.8.1.14, 3.8.1.15, 3.8.1.16, 3.8.1.17, and 3.8.1.18, respectively

These surveillance requirements are met by the performance of several plant procedures. The surveillance history was reviewed. The systems are tested individually, so the procedures

SECRET

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Attachment 2

Page 7 of 11

## SURVEILLANCE TEST INTERVAL EXTENSION

represent the divisional tests performed. The specific problems identified are discussed below. Table 1 associates the applicable procedure with the surveillance requirement.

Plant procedure 7.4.8.1.1.2.5B: On 5/10/91, DG-1 failed to start in less than 10 seconds (10.2 sec). A repeat of the hot restart function was required. A recurrence of the failure observed would not significantly impact the availability of the system, given a test interval extension to 30 months, because additional testing is performed on the DG with a greater frequency (PPMs 7.4.8.1.1.2.1 and 7.4.8.1.1.2.2). Procedure 7.4.8.1.1.2.2 is performed semi-annually and slow starts would be detectable under this test (new SR 3.8.1.7). No other unsatisfactory surveillance results were identified. The favorable surveillance test history, the additional semi-annual functional testing, and the system reliability justify extension of the test interval up to 30 months.

Plant procedure 7.4.8.1.1.2.5C: On 5/31/91, during the DG-2 24 hour run, the diesel could not be paralleled to its bus due to a lack of voltage indication on the incoming voltmeter. Troubleshooting found the secondary potential transformer fuse to the synchronizing circuit in the switch gear had blown. The availability of the DG would not be expected to be significantly affected due to a recurrence of this failure if the surveillance test interval were to be extended to 30 months. The ability of the DG to be paralleled to the grid is tested monthly under procedure 7.4.8.1.1.11 (new SR 3.8.1.3). The other surveillance test results were satisfactory. The equipment history review also showed the reliability and the availability of the Division 2 DG to be within the established bounds for acceptable system performance over the last two operating cycles. The favorable surveillance test history, the additional functional testing performed, and the system reliability justify extension of the test interval up to 30 months.

Plant procedure 7.4.8.1.1.2.7: On 6/6/93, the DG failed to start. The retest was successful on 6/7/93. While equipment failure resulting in an inability to perform the function under test has occurred, the recurrence of these failures would not be expected to significantly impact the availability of the system, given a test interval of 30 months, because additional testing is performed on the DG with a greater frequency (procedures 7.4.8.1.1.2.1 and 7.4.8.1.1.2.2). At least one of these tests is performed each month and the failure which was observed under procedure 7.4.8.1.1.2.7 would be detectable under the monthly test. The equipment history review showed no subsequent failures to start. Moreover, the actual reliability and availability of DG-1 has been within the performance criteria established for the Maintenance Rule program. The favorable surveillance test history, the additional testing conducted at monthly intervals, and the equipment history justify extension of the surveillance test interval up to 30 months.

Plant procedure 7.4.8.1.1.2.8: On 7/4/94, the surveillance test was unsatisfactory due to the failure of the fan (DMA-FN-31) in the room air handling unit to start. While equipment failure resulting in an inability to perform the function under test has occurred, the recurrence of this failure would not be expected to significantly impact the availability of the system, given a test interval of 30 months, because additional testing is performed on the DG with a greater frequency (procedures 7.4.8.1.1.2.12 and 7.4.8.1.1.2.13). At least one of these tests is

# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Attachment 2

Page 8 of 11

## SURVEILLANCE TEST INTERVAL EXTENSION

performed each month and each requires a verification of a DMA-FN-31 start. No other unsatisfactory test performance was identified. The equipment history review showed that the performance of the HPCS DG and the HPCS SW experienced no functional failures over the last two operating cycles. In addition, the DMA system performance has been within the performance criteria established for the Maintenance Rule program. The favorable surveillance test history, the additional monthly testing and the equipment history justify extension of the surveillance test interval up to 30 months.

### SECTION 3.8.4 DC SOURCES

CTS 4.8.2.1.c.4.e

ITS SR 3.8.4.6

Plant procedure 7.4.2.1.18: In May 1995, during the performance of the surveillance test to satisfy CTS 4.8.2.1.c.4.e, the charger input breaker for the 250V battery tripped due to thermal overload. The cause of the trip was determined to be build up of heat from adjacent electrical components due to a lack of ventilation in the room. After the room ventilation was restored, the test was performed without further problems.

Although a problem was noted in the performance of the procedure necessary to satisfy the surveillance requirement listed, the problem noted would not be expected to impact the availability of the systems given a test interval extension to 30 months. The actual reliability and availability of the systems have been within the performance criteria established for the Maintenance Rule program. The favorable surveillance test history and the equipment history justify extension of the surveillance test interval up to 30 months.

### SECTION 5.5.2 PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT

CTS 6.8.4.a.2

ITS 5.5.2.b

Primary Coolant Leakage Outside Containment, CTS 6.8.4.a.2, is currently satisfied by the performance of procedures 7.6.0.1 through 7.6.0.9. The available surveillance history of these procedures was reviewed and one failure was identified. This failure was the result of two problems. Investigation into the cause of the excessive leakage identified during the performance of the procedure on 9/21/95, determined that two lines in the sample rack had been incorrectly installed during the last maintenance. As a corrective action, the tubing was more clearly labeled to preclude repeating this error. In addition, the most recent revision to the surveillance procedure required the system to be pressurized against a containment isolation valve in the reverse direction. The failure of the valve to seat adequately under these conditions indicated unacceptable system leakage. The procedure was revised so that a different type of valve was used as the test boundary.





# REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

Attachment 2

Page 9 of 11

## SURVEILLANCE TEST INTERVAL EXTENSION

In addition to these procedures, there are other activities performed more frequently that will identify system leakage. The equipment operator tours are required to watch for and identify system leakage problems. There are regular walkdowns by the system engineers. The quarterly operability procedures also require a system walkdown to look for leaks. Adequate protection provided by more frequently performed activities justifies the extension of the surveillance interval in ITS Section 5.5.2.b. The 24 month frequency is consistent with the Appendix J leakage testing requirements.

### SECTION 5.5.7 VENTILATION FILTER TESTING PROGRAM

CTSs 4.6.5.3.b.1, 4.6.5.3.b.2, 4.6.5.3.b.3, 4.6.5.3.d.1, 4.6.5.3.d.4, 4.7.2.c.1, 4.7.2.c.2, 4.7.2.c.3, 4.7.2.e.1, and 4.7.3.e.3

ITSs 5.5.7, 5.5.7.a, 5.5.7.b, 5.5.7.c, 5.5.7.d, and 5.5.7.e

The surveillance history was reviewed. The specific problems identified are discussed below, by procedure number. The list of the surveillance procedures which are performed to satisfy the filter and ventilation program surveillance requirements are shown in Table 2.

Plant procedure 7.4.6.5.3.2A: On 7/2/94, the performance of the procedure was halted and a work request was issued to recalibrate a flow transmitter. The procedure did not provide adequate direction on the use of the test equipment and the failure was not related to the system under test. This was resolved and the procedure was completed successfully.

Plant procedure 7.4.7.2.3A: On 7/8/91, the surveillance test was unsatisfactory due to improper sampling. A subsequent test was unsatisfactory due to test equipment problems.

The only performance problems associated with these thirteen surveillance tests since 1990 are related to the test itself and not the equipment performance. Moreover, the system demonstrated acceptable performance without any adjustment required subsequent to the unsatisfactory testing. The equipment history review showed no functional failures associated with systems during the previous two operating cycles. The surveillance test and reliability histories support extension of the surveillance test interval up to 30 months.

WEL

APR 6

**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Attachment 2

Page 10 of 11

**SURVEILLANCE TEST INTERVAL EXTENSION**

TABLE 1

| PLANT PROCEDURE | SURVEILLANCE REQUIREMENT  | DIVISION |
|-----------------|---|----------|
| 7.4.8.1.1.2     | 4.8.1.1.1.b   | NA       |
| 7.4.8.1.1.2.5B  | 4.8.1.1.2.e.2<br>4.8.1.1.2.e.3<br>4.8.1.1.2.e.4<br>4.8.1.1.2.e.8                                      | DIV 1    |
| 7.4.8.1.1.2.5C  | 4.8.1.1.2.e.2<br>4.8.1.1.2.e.3<br>4.8.1.1.2.e.4<br>4.8.1.1.2.e.8                                      | DIV 2    |
| 7.4.8.1.1.2.6   | 4.8.1.1.2.e.2<br>4.8.1.1.2.e.3<br>4.8.1.1.2.e.4<br>4.8.1.1.2.e.8                                      | HPCS     |
| 7.4.8.1.1.2.7   | 4.8.1.1.2.e.5<br>4.8.1.1.2.e.6<br>4.8.1.1.2.e.7<br>4.8.1.1.2.e.10<br>4.8.1.1.2.e.11<br>4.8.1.1.2.e.12 | DIV 1    |
| 7.4.8.1.1.2.7A  | 4.8.1.1.2.e.5<br>4.8.1.1.2.e.6<br>4.8.1.1.2.e.7<br>4.8.1.1.2.e.10<br>4.8.1.1.2.e.11<br>4.8.1.1.2.e.12 | DIV 2    |
| 7.4.8.1.1.2.8   | 4.8.1.1.2.e.5<br>4.8.1.1.2.e.6<br>4.8.1.1.2.e.7<br>4.8.1.1.2.e.10<br>4.8.1.1.2.e.11                   | HPCS     |

**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Attachment 2

Page 11 of 11

**SURVEILLANCE TEST INTERVAL EXTENSION**

**TABLE 2**

| PLANT PROCEDURE                  | SURVEILLANCE REQUIREMENT            | SYSTEM |
|----------------------------------|-------------------------------------|--------|
| 7.4.6.5.3.5A and<br>7.4.6.5.3.5B | 4.6.5.3.b.1                         | SGT    |
| 7.4.6.5.3.6A and<br>7.4.6.5.3.6B | 4.6.5.3.b.2                         | SGT    |
| 7.4.6.5.3.2A and<br>7.4.6.5.3.2B | 4.6.5.3.b.3<br>4.6.5.3.d.1          | SGT    |
| 7.4.6.5.3.4A and<br>7.4.6.5.3.4B | 4.6.5.3.d.4                         | SGT    |
| 7.4.7.2.2A and<br>7.4.7.2.2B     | 4.7.2.c.1<br>4.7.2.c.3<br>4.7.2.e.1 | CREF   |
| 7.4.7.2.3A and<br>7.4.7.2.3B     | 4.7.2.c.2                           | CREF   |
| 7.4.7.2.5                        | 4.7.3.e.3                           | CREF   |

