



Tennessee Valley Authority, 1101 Market Street, Chattanooga, Tennessee 37402

CNL-17-149

December 27, 2017

10 CFR 50.90

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Watts Bar Nuclear Plant, Unit 1
Facility Operating License No. NPF-90
NRC Docket No. 50-390

Watts Bar Nuclear Plant, Unit 2
Facility Operating License No. NPF-96
NRC Docket No. 50-391

Subject: Revised Additional Supplement to Application to Revise Technical Specifications to Adopt TSTF-547, Revision 1, "Clarification of Rod Position Requirements" (WBN-TS-16-025)

- References:
1. TVA letter to NRC, CNL-16-148, "Application to Revise Technical Specifications to Adopt TSTF-547, Revision 1, 'Clarification of Rod Position Requirements' (WBN-TS-16-025)," dated November 23, 2016 (ML16335A179)
 2. Technical Specification Task Force (TSTF) letter to NRC, "TSTF Comments on Draft Model Safety Evaluation of Traveler TSTF-547, Revision 0, 'Clarification of Rod Position Requirements,' and Transmittal of TSTF-547, Revision 1," dated December 31, 2015 (ML15365A610)
 3. NRC letter to TSTF, "Final Safety Evaluation of Technical Specifications Task Force Traveler TSTF-547, Revision 1, 'Clarification of Rod Position Requirements' (TAC No. MF3570)," dated March 4, 2016 (ML16012A130 and ML15328A350)
 4. TVA letter to NRC, CNL-17-123, "Supplement to Application to Revise Technical Specifications to Adopt TSTF-547, Revision 1, 'Clarification of Rod Position Requirements' (WBN-TS-16-025)," dated September 29, 2017 (ML17272A955)

5. TVA letter to NRC, CNL-17-143, "Additional Supplement to Application to Revise Technical Specifications to Adopt TSTF-547, Revision 1, 'Clarification of Rod Position Requirements' (WBN-TS-16-025)," dated November 16, 2017 (ML17321A033)

In Reference 1, Tennessee Valley Authority (TVA) submitted a request for an amendment to the Technical Specifications (TS) for the Watts Bar Nuclear Plant (WBN), Units 1 and 2. The proposed amendment revises the requirements on control and shutdown rods, and rod and bank position indication in accordance with Technical Specification Task Force (TSTF)-547, Revision 1, "Clarification of Rod Position Requirements" (References 2 and 3). In Reference 4, TVA submitted a supplement to the license amendment request (LAR) to revise WBN Units 1 and 2 TS 3.1.6 and 3.1.7 to add the plant specific number of steps for control rod movement for consistency with WBN Units 1 and 2 SR 3.1.5.2. In Reference 5, TVA submitted an additional supplement to justify changes to the WBN Units 1 and 2 TS that were not specifically identified in TSTF-547. TVA is revising Reference 5 to add the justification for the following TS changes that were not addressed in Reference 5 and were not identified as a change in TSTF-547:

- Deletion of the Note to TS 3.1.8, "Rod position Indication"
- Addition of Condition B to TS 3.1.8
- Modification of the frequency for Surveillance Requirement 3.1.8.1

The revised Attachment 1 to this submittal supersedes the Attachment 1 in References 1 and 5.

This response does not change the no significant hazards considerations determination contained in Reference 1. There are no new commitments associated with this submittal. The commitment in Attachment 2 to Reference 5 remains valid. Please address any questions regarding this request to Edward D. Schrull at (423) 751-3850.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 27th day of December 2017.

Respectfully,



J. W. Shea
Vice President, Nuclear Regulatory Affairs and Support Services

Attachment:

1. Description and Assessment

cc (see Page 3)

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cc (Attachments):

NRC Regional Administrator - Region II

NRC Senior Resident Inspector - Watts Bar Nuclear Plant

NRC Project Manager – Watts Bar Nuclear Plant

Director, Division of Radiological Health - Tennessee State Department of Environment
and Conservation (w/o attachments)

ATTACHMENT 1 - DESCRIPTION AND ASSESSMENT

1.0 DESCRIPTION

The proposed amendment revises the requirements on control and shutdown rods, and rod and bank position indication in the Watts Bar Nuclear (WBN) Plant, Unit 1 and Unit 2 Technical Specification (TS) 3.1.5, "Rod Group Alignment Limits," TS 3.1.6, "Shutdown Bank Insertion Limits," TS 3.1.7, "Control Bank Insertion Limits," and TS 3.1.8, "Rod Position Indication." The proposed amendment provides time to repair rod movement failures that do not affect rod Operability, to provide time for analog position indication instruments to read accurately after rod movement, to correct conflicts between the TS, to eliminate an unnecessary action, and to increase consistency and to improve the presentation.

2.0 ASSESSMENT

2.1 Applicability of Safety Evaluation

The Tennessee Valley Authority (TVA) has reviewed the safety evaluation for Technical Specifications Task Force 547 (TSTF-547), Revision 1 provided to the TSTF in a letter dated March 4, 2016. This review included a review of the Nuclear Regulatory Commission (NRC) staff's evaluation, as well as the information provided in TSTF-547, Revision 1. As described in the subsequent paragraphs, TVA has concluded that the justifications presented in the TSTF-547, Revision 1 proposal and the safety evaluation prepared by the NRC staff are applicable to WBN Unit 1 and Unit 2, and justify this amendment for the incorporation of the changes to the WBN Unit 1 and Unit 2 TS.

2.2 Variations

TVA is proposing the following minor variations from the TS changes described in TSTF-547, Revision 1. These variations do not affect the applicability of TSTF-547, Revision 1 or the NRC staff's safety evaluation to the proposed license amendment.

1. The WBN Unit 1 and Unit 2 TS utilize different numbering than the Standard Technical Specifications on which TSTF-547, Revision 1 was based. The following table summarizes the differences between the WBN Unit 1 and Unit 2 TS numbering and the TSTF-547, Revision 1 numbering.

TSTF-547, Rev. 1	WBN Unit 1	WBN Unit 2
TS 3.1.4, "Rod Group Alignment Limits"	TS 3.1.5, "Rod Group Alignment Limits"	TS 3.1.5, "Rod Group Alignment Limits"
TS 3.1.5, "Shutdown Bank Insertion Limits"	TS 3.1.6, "Shutdown Bank Insertion Limits"	TS 3.1.6, "Shutdown Bank Insertion Limits"
TS 3.1.6, "Control Bank Insertion Limits"	TS 3.1.7, "Control Bank Insertion Limits"	TS 3.1.7, "Control Bank Insertion Limits"
TS 3.1.7, "Rod Position Indication"	TS 3.1.8, "Rod Position Indication"	TS 3.1.8, "Rod Position Indication"

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The use of different numbering does not affect the applicability of TSTF-547, Revision 1 to the WBN Unit 1 and Unit 2 TS.

2. TSTF-547, Revision 1, TS 3.1.7, "Rod Position Indication," Required Actions A.1 and C.1 discuss indirect verification of rod position by using movable incore detectors when the rod position indication system is inoperable. As described in Section 7.7.1.9 of the WBN Dual Unit Updated Final Safety Analysis Report, WBN Unit 1 and Unit 2 have a power distribution monitoring system (PDMS) that can be utilized to obtain a three-dimensional power distribution measurement to indirectly provide rod position verification.

WBN Unit 1 has the ability to indirectly verify rod position utilizing either a movable incore system or the PDMS (References 1 and 2). WBN Unit 2 uses the fixed incore system as input to PDMS to indirectly verify rod position (Reference 3). Accordingly, the proposed WBN Unit 1 and Unit 2 TS 3.1.8, "Rod Position Indication" and associated TS Bases refer to utilizing the PDMS or moveable incore detectors for WBN Unit 1 and the PDMS for WBN Unit 2 in order to provide indirect verification of rod position for an inoperable rod indicator.

TVA has determined that the variation from TSTF-547 to continue allowing the use of the PDMS to indirectly verify rod position does not affect the applicability of TSTF-547, Revision 1 to the WBN Unit 1 and Unit 2 TS.

3. TSTF-547, Revision 1, Surveillance Requirement (SR) 3.1.4.3 contains a value for T_{avg} of 500°F, whereas the current WBN value (in SR 3.1.5.3) is 551°F. The temperature of 551°F represents a WBN Unit 1 plant-specific historical artifact of the licensing evolution process as the WBN Unit 1 TS transitioned from NUREG-0452, Revision 4 to NUREG-1431, Revision 0 (the Westinghouse Standard Technical Specifications), which kept the value at 551°F. The SR to demonstrate rod drop time was initially based on performing the test with all reactor coolant pumps operating and the average moderator temperature $\geq 551^\circ\text{F}$ to simulate a reactor trip under actual conditions. WBN Unit 2 also specifies the 551°F temperature.

TVA has determined that the variation of the temperature specified in SR 3.1.4.3 (TVA proposed SR 3.1.5.3) is consistent with the current licensing basis of the plants and does not affect the applicability of TSTF-547, Revision 1 to the WBN Unit 1 and Unit 2 TS.

4. Incorporation of specific WBN minor format variations:
 - Indentation of "OR" between TS 3.1.5, Required Action B.1.1 and B.1.2.
 - Addition of the word "overlap" in TS 3.1.7, Required Action A.3, which was inadvertently left out of the TSTF-547 template. Note that the word "overlap" is correctly contained in and consistent with Limiting Condition for Operation (LCO) 3.1.7, TS 3.1.7 Conditions A. and C., TS 3.1.7 Required Action C.2, and SR 3.1.7.3.

These differences are administrative and do not affect the applicability of TSTF-547, Revision 1 to the WBN Unit 1 and Unit 2 TS.

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5. The proposed changes to the TS pages for Condition A of WBN Unit 1 and Unit 2 TS 3.1.6 and TS 3.1.7 replace the bracketed “inserted \leq 16 steps” with “inserted \leq 10 steps.” As noted in TSTF-547, Revision 1, and the NRC Safety Evaluation (Reference 4), the number 16 is bracketed and it is to be replaced with the “plant-specific minimum number of steps that the rods must be moved to perform SR 3.1.5.2.” As noted in Item 1, TS 3.1.4 in TSTF-547, Revision 1 corresponds to WBN Units 1 and 2 TS 3.1.5. Correspondingly, WBN Units 1 and 2 SR 3.1.5.2 states “Verify rod freedom of movement (trippability) by moving each rod not fully inserted in the core \geq 10 steps in either direction.” Therefore, the proposed changes to WBN Unit 1 and Unit 2 TS 3.1.6 and 3.1.7 are consistent with WBN Units 1 and 2 SR 3.1.5.2. As noted in the Bases for WBN Units 1 and 2 SR 3.1.5.2, “Moving each control rod by 10 steps will not cause radial or axial power tilts, or oscillations, to occur.” The number of steps in WBN Units 1 and 2 SR 3.1.5.2 is also consistent with SR 3.1.4.2 in the Westinghouse Standard TS (STS) in NUREG-1431, Revision 4, “Standard Technical Specifications Westinghouse Plants.”
6. The following TS changes are consistent with the Westinghouse STS, but are not identified as changes in TSTF-547, Revision 1.

WBN 1 and 2 TS	Description of Change	Justification
3.1.5 Limiting Condition for Operation (LCO)	<p>Changed “All shutdown and control rods shall be OPERABLE, with all individual indicated rod positions within 12 steps of their group step counter demand position” to</p> <p>“All shutdown and control rods shall be OPERABLE</p> <p><u>AND</u></p> <p>Individual indicated rod positions shall be within 12 steps of their group step counter demand position”</p>	This change is consistent with the Westinghouse STS and is editorial in nature to clarify the applicability of the LCO.
3.1.5, Condition A	Changed “one or more rod(s) untrippable” to “one or more rod(s) inoperable”	This change is consistent with the Westinghouse STS and TSTF-9-A, Revision 1.
3.1.5, Required Action B.4	Added SR 3.2.1.2	This change is consistent with the Westinghouse STS and the current WBN TS Bases B3.1.5, Actions B.2.2, B.2.3, B.2.4, B.2.5, and B.2.6.

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WBN 1 and 2 TS	Description of Change	Justification
<p>3.1.5, Required Actions A.1.1, B.1.1, B.3, and D.1.1</p> <p>3.1.6, Required Action B.1.1</p> <p>3.1.7, Required Actions B.1.1 and C.1.1</p>	<p>“Verify SDM is $\geq 1.6\% \Delta k/k$” was changed to “Verify SDM to be within the limits specified in the Core Operating Limits Report (COLR).”</p>	<p>This change is consistent with the Westinghouse STS and TSTF-9-A, Revision 1, “Relocate value for shutdown margin to COLR” (Reference 5), which was approved by NRC in Reference 6.</p> <p>The COLR process reduces the burden on the licensees and the NRC from processing changes to cycle-specific parameter limits in TSs for each fuel cycle, provided the limits are developed using an NRC approved methodology. TVA will revise the COLR for WBN Units 1 and 2 to relocate the shutdown margin (SDM) limits in the following Technical Specifications to the COLR:</p> <ul style="list-style-type: none"> • 3.1.5, "Rod Group Alignment Limits" • 3.1.6, "Shutdown Bank Insertion Limits" • 3.1.7, "Control Bank Insertion Limits"
SR 3.1.5.3	<p>Revised the frequency from “Prior to reactor criticality after initial fuel loading and each removal of the reactor head” to “Prior to criticality after each removal of the reactor head”</p>	<p>This change is consistent with the Westinghouse STS. Initial fuel loading has been completed for WBN Units 1 and 2.</p>
3.1.6	<p>The Applicability Statement was revised from: “MODE 1, MODE 2 with any control bank not fully inserted.”</p> <p>to</p> <p>“MODES 1 and 2”</p>	<p>This change is consistent with the Westinghouse STS and TSTF-239-A, Revision 0, “Correct shutdown bank insertion limits applicability” (Reference 7). As noted in TSTF-239, “the Applicability is changed to simply ‘Mode 1 and Mode 2.’ This does not result in any actual change to the requirements but simplifies the specifications. Appropriate Bases changes were also made.”</p>
SR 3.1.6.1 (Unit 1 only)	<p>The surveillance was revised to add “insertion” between “the” and “limits”</p>	<p>This change is consistent with the WBN Unit 2 TS and the Westinghouse STS.</p>

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WBN 1 and 2 TS	Description of Change	Justification
3.1.7, Required Action D.1	Revised "Be in MODE 3" to "Be in MODE 2 with k_{eff} < 1.0."	This change is consistent with the current Applicability Statement for TS 3.1.7 and the Westinghouse STS.
3.1.8, Condition A	The Note for Condition A has been deleted.	<p>The Note for Condition A was added in the WBN Unit 1 TS in NRC License Amendment 58 (Reference 2) and was subsequently incorporated into the initial WBN Unit 2 TS (Reference 3). The Note currently states:</p> <p>"Rod position monitoring by Required Actions A.2.1 and A.2.2 may only be applied to one inoperable ARPI and shall only be allowed: (1) until the end of the current cycle, or (2) until an entry into MODE 5 of sufficient duration, whichever occurs first, when the repair of the inoperable ARPI can safely be performed. Required Actions A.2.1, A.2.2 and A.2.3 shall not be allowed after the plant has been in MODE 5 or other plant condition, for a sufficient period of time, in which the repair of the inoperable ARPI could have safely been performed."</p> <p>Current Required Actions A.2.2 and A.2.3 do not contain any requirements for restoration of an inoperable Rod Position Indication (RPI) to an operable status. Current Required Actions A.2.2 and A.2.3 have been deleted in accordance with TSTF-547, Revision 1 and replaced with new Required Action A.2.2 that requires restoration of an inoperable RPI to an operable status prior to entering Mode 2 from Mode 3. Therefore, new Required Action A.2.2 would encompass any entry into Mode 5 of sufficient duration or a plant outage following the end of the operating cycle.</p>

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WBN 1 and 2 TS	Description of Change	Justification
3.1.8, Condition A (continued)		Furthermore, the portion of the Note that states “Rod position monitoring by Required Actions A.2.1 and A.2.2 may only be applied to one inoperable ARPI “ is encompassed by the new TS 3.1.8 Condition B that applies when more than one RPI per group is inoperable in one or more groups and requires restoration of the inoperable RPIs to operable status such that a maximum of one RPI per group is inoperable.

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WBN 1 and 2 TS	Description of Change	Justification
3.1.8, Condition B	Added new Condition B	<p>This change is consistent with TSTF-234-A Revision 1 (Reference 8) that was approved by the NRC in Reference 9, the Westinghouse STS, and TSTF-547, Revision 1. As noted in Reference 8, the purpose of TSTF-234-A Revision 1 was to:</p> <p>“Add new Action B to allow 24 hours to restore inoperability of more than one [D]RPI in a group.”</p> <p>TSTF-234-A Revision 1 further states:</p> <p>“The additional time to restore an inoperable [D]RPI is appropriate because the proposed Action would require that the control rods be under manual control, that RCS Tavg be monitored and recorded hourly, and that rod position be verified indirectly every 8 hours using the moveable incore detectors, thereby assuring that the rod alignment and rod insertion LCOs are met. Therefore, the required shutdown margin will be maintained. Given the alternate position monitoring requirement, and other indirect means of monitoring changes in rod position (e.g., alarms on Tavg - Tref deviation), a 24 hour Completion Time to restore all but one [D]RPI per group provides sufficient time to restore Operability while minimizing shutdown transients during the time that the position indication system is degraded.”</p>

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WBN 1 and 2 TS	Description of Change	Justification
SR 3.1.8.1	The SR frequency was revised from 18 months to "Once prior to criticality after each removal of the reactor head."	<p>This change is consistent with TSTF-89 (Reference 10) that was approved by the NRC in Reference 6 and the Westinghouse STS. As noted in Reference 10:</p> <p>"SR 3.1.8.1 verifies that each DRPI agrees within 12 steps of the group demand position for the full indicated range of rod travel. This surveillance is performed during a plant outage or plant startup since there is potential for unnecessary plant transients if the SR is performed with the reactor at power. By not specifying a fixed frequency for this SR, any unit shutdown and reactor vessel head removal would require that the SR be performed again to verify that the operability of the rod position indicator systems has not been affected."</p>

Therefore, TVA is not proposing any significant variations or deviations from the TS changes described in TSTF-547, Revision 1 or the applicable parts of the NRC staff's Safety Evaluation.

The Traveler and safety evaluation discuss the applicable regulatory requirements and guidance, including the 10 CFR 50, Appendix A, General Design Criteria (GDC). WBN Unit 1 and Unit 2 were designed to meet the intent of the "Proposed General Design Criteria for Nuclear Power Plant Construction," published for comment in the Federal Register on July 11, 1967 (32 FR 10213). The WBN Unit 1 and Unit 2 construction permit was issued in January 1973. UFSAR Section 3.1, "Conformance with NRC General Design Criteria," addresses the NRC General Design Criteria published as Appendix A to 10 CFR 50 in July 1971, including Criterion 4 as amended October 27, 1987. This difference does not alter the conclusion that the proposed change is applicable to WBN Unit 1 and Unit 2.

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3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Analysis

TVA requests adoption of TSTF-547, Revision 1, "Clarification of Rod Position Requirements," which is an approved change to the Standard Technical Specifications, into the Watts Bar Nuclear Plant, Unit 1 and Unit 2 Technical Specifications (TS). The proposed change revises the requirements on control and shutdown rods, and rod and bank position indication to provide time to repair rod movement failures that do not affect rod Operability, to provide time for analog position indication instruments to read accurately after rod movement, to correct conflicts between the TS, to eliminate an unnecessary action, and to increase consistency and to improve the presentation.

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

1. Does the proposed amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No

Control and shutdown rods are assumed to insert into the core to shut down the reactor in evaluated accidents. Rod insertion limits ensure that adequate negative reactivity is available to provide the assumed shutdown margin (SDM). Rod alignment and overlap limits maintain an appropriate power distribution and reactivity insertion profile.

Control and shutdown rods are initiators to several accidents previously evaluated, such as rod ejection. The proposed change does change the limiting conditions for operation for the rods and makes technical changes to the Surveillance Requirements (SRs) governing the rods. However, the proposed change has no significant effect on the probability of any accident previously evaluated.

Revising the TS Actions to provide a limited time to repair rod movement control has no effect on the SDM assumed in the accident analysis as the proposed Action require verification that SDM is maintained. The effects on power distribution will not cause a significant increase in the consequences of any accident previously evaluated as all TS requirements on power distribution continue to be applicable. Revising the TS Actions to provide an alternative to frequent use of the moveable incore detector system to verify the position of rods with inoperable rod position indicator does not change the requirement for the rods to be aligned and within the insertion limits.

Therefore, the assumptions used in any accidents previously evaluated are unchanged and there is no significant increase in the consequences.

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The consequences of an accident that might occur during the 1-hour period provided for the analog rod position indication to stabilize after rod movement are no different than the consequences of the accident under the existing actions with the rod declared inoperable.

The proposed change to resolve the conflicts in the TS ensure that the intended Actions are followed when equipment is inoperable. Actions taken with inoperable equipment are not assumptions in the accidents previously evaluated and have no significant effect on the consequences.

The proposed change to eliminate an unnecessary action has no effect on the consequences of accidents previously evaluated as the analysis of those accidents did not consider the use of the action.

The proposed change to increase consistency within the TS has no effect on the consequences of accidents previously evaluated as the proposed change clarifies the application of the existing requirements and does not change the intent.

Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed amendment create the possibility of a new or different kind of accident from any previously evaluated?

Response: No

The proposed change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed). The change does not alter assumptions made in the safety analyses. The proposed change does alter the limiting conditions for operation for the rods and makes technical changes to the SRs governing the rods. However, the proposed change to actions maintains or improves safety when equipment is inoperable and does not introduce new failure modes.

Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. Does the proposed amendment involve a significant reduction in a margin of safety?

Response: No

The proposed change to allow time for rod position indication to stabilize after rod movement and to allow an alternative method of verifying rod position has no effect on the safety margin as actual rod position is not affected. The proposed change to provide time to repair rods that are Operable but immovable does not result in a significant reduction in the margin of safety because all rods must be verified to be Operable, and all other banks must be within the insertion limits. The remaining proposed changes to make the requirements internally consistent and to eliminate

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unnecessary actions do not affect the margin of safety as the changes do not affect the ability of the rods to perform their specified safety function.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

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

3.2 Conclusions

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

4.0 ENVIRONMENTAL EVALUATION

The proposed change would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed change does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9).

Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed change.

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5.0 REFERENCES

1. NRC letter to TVA, "Watts Bar Nuclear Plant Unit 1 - Issuance of Amendment Regarding the Application to Implement BEACON Core Power Distribution and Monitoring System (TAC No. ME1698)," dated October 27, 2009 (ML092710381)
2. NRC letter to TVA, "Watts Bar Nuclear Plant Unit 1 - Issuance of Amendment Regarding Alternate Means for Monitoring Control or Shutdown Rod Positions (TAC No. MC1419) (WBN-TS-03-12)," dated September 20, 2005 (ML052300162)
3. Watts Bar Nuclear Plant Unit 2, Technical Specification 3.1.8, "Rod Position Indication," Facility Operating License No. NPF-96, dated October 22, 2015 (ML15251A587)
4. NRC letter to TSTF, "Final Safety Evaluation of Technical Specifications Task Force Traveler TSTF-547, Revision 1, 'Clarification of Rod Position Requirements' (TAC No. MF3570)," dated March 4, 2016 (ML16012A130 and ML15328A350)
5. TSTF-9-A, Revision 1, "Relocate value for shutdown margin to COLR," dated January 8, 1996 (ML040400130)
6. NRC letter to Nuclear Energy Institute dated September 27, 1996 (Legacy Accession Number 9610030183)
7. TSTF-239-A, Rev. 0, "Correct shutdown bank insertion limits applicability," dated February 5, 1998 (ML040611057)
8. TSTF-234-A, Revision 1, "Add Action for More Than One [D]RPI Inoperable," dated January 11, 1999
9. NRC letter to the Nuclear Energy Institute dated January 11, 1999 (Legacy Accession Number 9901210038)
10. TSTF-89-A, "Change to Frequency of SR 3.1.8.1," dated May 28, 1996