DEFINITIONS

1.29 Deleted

PROCESS CONTROL PROGRAM

1.30 The PROCESS CONTROL PROGRAM (PCP) shall contain the current formulas, sampling, analyses, tests, and determinations to be made to ensure that processing and packaging of solid radioactive wastes based on demonstrated processing of actual or simulated wet solid wastes will be accomplished in such a way as to assure compliance with 10 CFR Parts 20, 61, and 71, State regulations, burial ground requirements, and other requirements governing the disposal of solid radioactive waste.

1.31 Deleted

OFFSITE DOSE CALCULATION MANUAL (ODCM)

1.32 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of offsite doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Environmental Radiological Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and ~~Semiannual~~ Radioactive Effluent Release Reports required by Specifications 6.9.1.10 and 6.9.1.11.

1.33 Deleted

1.34 Deleted

1.35 Deleted

1.36 Deleted

MEMBER(S) OF THE PUBLIC

1.37 MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the plant. This category does not include employees of the utility, its contractors or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries. This category does include persons who use portions of the site for recreational, occupational or other purposes not associated with the plant.

SITE BOUNDARY

1.38 The SITE BOUNDARY shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by the licensee.

INSTRUMENTATION

WASTE GAS SYSTEM OXYGEN MONITOR

LIMITING CONDITION FOR OPERATION

3.3.3.9 The Waste Gas System Oxygen monitor shall be OPERABLE with its alarm setpoints set to ensure that the limits of Specification 3.11.2 are not exceeded.

APPLICABILITY: During additions to the waste gas surge tank.

ACTION:

a. With the waste gas system oxygen monitor alarm setpoint less conservative than required by the above Specifications, declare the channel inoperable and comply with ACTION b.

b. With the waste gas system oxygen monitor inoperable, additions to the waste gas surge tank may continue provided another method for ascertaining oxygen concentrations, such as grab sample anslysis, is implemented to provide measurements at least once per four (4) hours during degassing and daily during other operations. Exert best efforts to return the waste gas system oxygen monitor to OPERABLE status within 30 days and, if unsuccessful, explain in the ~~next Semiannual~~ Radioactive Effluent Release Report why the inoperability was not corrected in a timely manner.

c. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.3.3.9 The waste gas system oxygen monitor shall be demonstrated OPERABLE by:

a. Performance of a CHANNEL CHECK at least once per 24 hours during additions to the waste gas surge tank.

b. At least once per 92 days by performance of a CHANNEL CALIBRATION. The CHANNEL CALIBRATION shall include the use of standard gas samples containing a nominal:

1. One volume percent oxygen, balance nitrogen; and

2. Four volume percent oxygen, balance nitrogen.

RADIOACTIVE EFFLUENTS

LIQUID HOLDUP TANKS*

LIMITING CONDITION FOR OPERATION

3.11.1 The quantity of radioactive material contained in each of the following unprotected outdoor tanks shall be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases. (1)

a. Outside temporary tank.

APPLICABILITY: At all times.

ACTION:

a. With the quantity of radioactive material in any of the above listed tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents to within the limit, and describe the event leading to this condition in the next ~~Semiannual~~ Radioactive Effluent Release Report.

b. The provisions of Specifications 3.0.3 and 3.0.4 are not applicable.

SURVEILLANCE REQUIREMENTS

4.11.1 The quantity of radioactive material contained in each of the above listed tanks shall be determined to be within the above limit by analyzing a representative sample of the tank contents at least once per 7 days when radioactive materials are being added to the tank. (1)

*Tanks included in this specification are those outdoor tanks that are not surrounded by liners, dikes, or walls capable of holding the tank contents or that do not have tank overflows and surrounding area drains connected to the liquid radwaste treatment system.

COMPOSITION

6.5.1.2 The Station Review Board (SRB) shall be composed of at least six members of the Davis-Besse onsite management organization. The members shall be as a minimum, managers or individuals reporting directly to managers from each of the following disciplines: plant operations, maintenance, planning, radiological controls, engineering, and quality assurance. The members shall meet the requirements of ANSI N18.1-1971, Sections 4.2, 4.4, or 4.6 for applicable required experience.

The SRB Chairman shall be drawn from the SRB members and designated in writing by the Plant Manager.

ALTERNATES

6.5.1.3 All alternate members shall be appointed in writing by the SRB Chairman; however, no more than two alternates shall participate as voting members in SRB activities at any one time.

MEETING FREQUENCY

6.5.1.4 The SRB shall meet at least once per calendar month and as convened by the SRB Chairman or his designee.

QUORUM

6.5.1.5 A quorum of the SRB shall consist of the Chairman or his designee and four members including alternates.

RESPONSIBILITIES

6.5.1.6 The Station Review Board shall be responsible for:

a. Review of plant administrative procedures and changes thereto.

b. Review of the safety evaluation for 1) procedures, 2) changes to procedures, equipment or systems, and 3) tests or experiments completed under the provisions of 10 CFR 50.59, to verify that such actions do not constitute an unreviewed safety question.

c. Review of proposed procedures and changes to procedures and equipment determined to involve an unreviewed safety question as defined in 10 CFR 50.59.

d. Review of proposed tests or experiments determined to involve an unreviewed safety question as defined in 10 CFR 50.59.

e. Review of reports of violations of codes, regulations, orders, Technical Specifications, or Operating License requirements having nuclear safety significance or reports of abnormal degradation of systems designed to contain radioactive material.

f. Review of all proposed changes to the Technical Specifications or the Operating License.

g. Deleted

h. Review of reports of significant operating abnormalities or deviations from normal and expected performance of plant equipment that affect plant safety.

i. Review of the Industrial Security Plan, the Security Training and Qualification Plan, and the Security Contingency Plan, and changes thereto.

j. Review of the Davis-Besse Emergency Plan and changes thereto.

k. Review of items which may constitute potential nuclear safety hazards as identified during review of facility operations.

l. Investigations or analyses of special subjects as requested by the Company Nuclear Review Board.

m. Review of all REPORTABLE EVENTS.

n. Review of all Safety Limit Violation Reports (Section 6.7).

o. Review of any unplanned, accidental or uncontrolled radioactive releases, evaluation of the event, ensurance that remedial action is identified to prevent recurrence, review of a report covering the evaluation and forwarding of the report to the Plant Manager and to the CNRB.

p. Review of the changes to the OFFSITE DOSE CALCULATION MANUAL.

q. Review of the changes to the PROCESS CONTROL PROGRAM.

r. Review of the Annual Radiological Environmental Operating Report.

s. Review of the ~~Semiannual~~ Radioactive Effluent Release Report.

T. Review of the Fire Protection Program and changes thereto.

ADMINISTRATIVE CONTROLS

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.9.1.10 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM, and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

~~SEMIANNUAL~~ RADIOACTIVE EFFLUENT RELEASE REPORT

6.9.1.11 The ~~Semiannual~~ Radioactive Effluent Release Report covering the operation of the unit ~~during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year.~~ The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and PCP, and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

Shall be submitted in accordance w.th 10 CFR 50.36a.

6.14 PROCESS CONTROL PROGRAM (PCP)

Changes to the PCP:

a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2.p. This documentation shall contain:

1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s), and

2) A determination that the change will maintain the overall conformance of the solidified waste product to existing requirements of Federal, State, or other applicable regulations.

b. Shall become effective after review and acceptance by the SRB and the approval of the Plant Manager.

6.15 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2.p. This documentation shall contain:

1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s), and

2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose or setpoint calculations.

b. Shall become effective after review and acceptance by the SRB and the approval of the Plant Manager.

c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as part of or concurrent with the ~~Semiannual~~ Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

REACTOR COOLANT SYSTEM

STEAM GENERATORS

LIMITING CONDITION FOR OPERATION

3.4.5 Each steam generator shall be OPERABLE with a water level between 18 and 348 inches.

APPLICABILITY: MODES 1, 2, 3 and 4.

ACTION:

a. With one or more steam generators inoperable due to steam generator tube imperfections, restore the inoperable generator(s) to OPERABLE status prior to increasing T_{avg} above 200°F.

b. With one or more steam generators inoperable due to the water level being outside the limits, be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the next 30 hours.

SURVEILLANCE REQUIREMENTS

4.4.5.0 Each steam generator shall be demonstrated OPERABLE by performance of the following augmented inservice inspection program and the requirements of Specification 4.0.5.

4.4.5.1 Steam Generator Sample Selection and Inspection - Each steam generator shall be determined OPERABLE during shutdown by selecting and inspecting at least the minimum number of steam generators specified in Table 4-4.1.

4.4.5.2 Steam Generator Tube Sample Selection and Inspection - The steam generator tube minimum sample size, inspection result classification, and the corresponding action required shall be as specified in Table 4.4-2. The inservice inspection of steam generator tubes shall be performed at the frequencies specified in Specification 4.4.5.3 and the inspected tubes shall be verified acceptable per the acceptance criteria of Specification 4.4.5.4. The tubes selected for each inservice inspection shall include at least 3% of the total number of tubes in all steam generators; the tubes selected for these inspections shall be selected on a random basis except:

a. The first sample inspection during each inservice inspection (subsequent to the baseline inspection) of each steam generator shall include:

1. All tubes or tube sleeves that previously had detectable wall penetrations (> 20%) that have not been plugged or repaired by sleeving in the affected area.

2. At least 50% of the tubes inspected shall be in those areas where experience has indicated potential problems.

SURVEILLANCE REQUIREMENTS (Continued)

3. A tube inspection (pursuant to Specification 4.4.5.4.a.8) shall be performed on each selected tube. If any selected tube does not permit the passage of the eddy current probe for a tube inspection, this shall be recorded and an adjacent tube shall be selected and subjected to a tube inspection.

b. Tubes in the following groups may be excluded from the first random sample if all tubes in a group in both steam generators are inspected. No credit will be taken for these tubes in meeting minimum sample size requirements.

1. Group A-1: Tubes within one, two or three rows of the open inspection lane.

2. Group A-2: Tubes having a drilled opening in the 15th support plate.

3. Group A-3: Tubes included in the rectangle bounded by rows 62 and 90 and by tubes 58 and 76, excluding tubes included in Group A-1.*

c. The tubes selected as the second and third samples (if required by Table 4.4-2) during each inservice inspection may be subjected to less than a full tube inspection provided:

1. The tubes selected for these samples include the tubes from those areas of the tube sheet array where tubes with imperfections were previously found.

2. The inspections include those portions of the tubes where imperfections were previously found.

The results of each sample inspection shall be classified into one of the following three categories:

Category	Inspection Results
C-1	Less than 5% of the total tubes inspected are degraded tubes and none of the inspected tubes are defective.
C-2	One or more tubes, but not more than 1% of the total tubes inspected are defective, or between 5% and 10% of the total tubes inspected are degraded tubes.
C-3	More than 10% of the total tubes inspected are degraded tubes or more than 1% of the inspected tubes are defective.

* Tubes in Group A-3 shall not be excluded after completion of the fifth refueling outage.

SURVEILLANCE REQUIREMENTS (Continued)

Notes: (1) In all inspections, previously degraded tubes must exhibit significant (> 10%) further wall penetrations to be included in the above percentage calculations.

(2) Where special inspections are performed pursuant to 4.4.5.2.b, defective or degraded tubes found as a result of the inspection shall be included in determining the Inspection Results Category for that special inspection but need not be included in determining the Inspection Results Category for the general steam generator inspection.

4.4.5.3 Inspection Frequencies - The above required inservice inspections of steam generator tubes shall be performed at the following frequencies:

a. The baseline inspection shall be performed to coincide with the first scheduled refueling outage but no later than April 30, 1980. Subsequent inservice inspections shall be performed at intervals of not less than 12 nor more than 24 calendar months after the previous inspection. If the results of two consecutive inspections for a given group* of tubes following service under all volatile treatment (AVT) conditions fall into the C-1 category or if two consecutive inspections demonstrate that previously observed degradation has not continued and no additional degradation has occurred, the inspection interval for that group may be extended to a maximum of 40 months.

b. If the results of the inservice inspection of a steam generator performed in accordance with Table 4.4-2 at 40 month intervals for a given group* of tubes fall in Category C-3, subsequent inservice inspections shall be performed at intervals of not less than 10 nor more than 20 calendar months after the previous inspection. The increase in inspection frequency shall apply until a subsequent inspection meets the conditions specified in 4.4.5.3a and the interval can be extended to 40 months.

c. Additional, unscheduled inservice inspections shall be performed on each steam generator in accordance with the first sample inspection specified in Table 4.4-2 during the shutdown subsequent to any of the following conditions:

1. Primary-to-secondary tube leaks (not including leaks originating from tube-to tube sheet welds) in excess of the limits of Specification 3.4.6.2.

*A group of tubes means:
(a) All tubes inspected pursuant to 4.4.5.2.b, or
(b) All tubes in a steam generator less those inspected pursuant to 4.4.5.2.b.

2. A seismic occurrence greater than the Operating Basis Earthquake.

3. A loss-of-coolant accident requiring actuation of the engineered safeguards.

4. A main steam line or feedwater line break.

d. The provisions of Specification 4.0.2 are not applicable.

4.4.5.4 Acceptance Criteria

a. As used in this Specification:

1. Tubing or Tube means that portion of the tube or tube sleeve which forms the primary system to secondary system boundary.

2. Imperfection means an exception to the dimensions, finish or contour of a tube from that required by fabrication drawings or specifications. Eddy-current testing indications below 20% of the nominal tube wall thickness, if detectable, may be considered as imperfections.

3. Degradation means a service-induced cracking, wastage, wear or general corrosion occurring on either inside or outside of a tube.

4. Degraded Tube means a tube containing imperfections $\geq$ 20% of the nominal wall thickness caused by degradation that has not been repaired by sleeving in the affected area.

5. % Degradation means the percentage of the tube wall thickness affected or removed by degradation.

6. Defect means an imperfection of such severity that it exceeds the repair limit. A defective tube is a tube containing a defect that has not been repaired by sleeving in the affected area or a sleeved tube that has a defect in the sleeve.

7. Repair Limit means the imperfection depth at or beyond which the tube shall be removed from service by plugging or repaired by sleeving in the affected area because it may become unserviceable prior to the next inspection and is equal to 40% of the nominal tube wall thickness. The Babcock and Wilcox process described in Topical Report BAW-2120P will be used for sleeving.

8. Unserviceable describes the condition of a tube if it leaks or contains a defect large enough to affect its structural integrity in the event of an Operating Basis Earthquake, a loss-of-coolant accident, or a steam line or feedwater line break as specified in 4.4.5.3.c, above.

9. Tube Inspection means an inspection of the steam generator tube from the point of entry completely to the point of exit.

REACTOR COOLANT SYSTEM

SURVEILLANCE REQUIREMENTS (Continued)

10. Preservice Inspection means an inspection of the full length of each tube in each steam generator performed by eddy current techniques prior to service to establish a baseline condition of the tubing. This inspection shall be performed prior to initial POWER OPERATION using the equipment and techniques expected to be used during subsequent inservice inspections.

b. The steam generator shall be determined OPERABLE after completing the corresponding actions (plug or repair by sleeving in the affected areas all tubes exceeding the repair limit and all tubes containing through-wall cracks) required by Table 4.4-2.

4.4.5.5 Reports

a. Following each inservice inspection of steam generator tubes, the number of tubes plugged in each steam generator shall be reported to the Commission within 15 days.

b. The complete results of the steam generator tube inservice inspection shall be submitted on an annual basis in a report for the period in which this inspection was completed. This report shall include:

1. Number and extent of tubes inspected.

2. Location and percent of wall-thickness penetration for each indication of an imperfection.

3. Identification of tubes plugged or sleeved.

c. Results of steam generator tube inspections which fall into Category C-3 and require ~~prompt~~ notification of the Commission shall be reported ~~pursuant to Specification 6.9.1~~ prior to resumption of plant operation. ~~The written followup of~~ This report shall provide a description of investigations conducted to determine cause of the tube degradation and corrective measures taken to prevent recurrence.

4.4.5.6 The steam generator shall be demonstrated OPERABLE by verifying steam generator level to be within limits at least once per 12 hours.

4.4.5.7 When steam generator tube inspection is performed as per Section 4.4.5.2, an additional but totally separate inspection shall be performed on special interest peripheral tubes in the vicinity of the secured internal auxiliary feedwater header. This testing shall only be required on the steam generator selected for inspection, and the test shall require inspection only between

SURVEILLANCE REQUIREMENTS (Continued)

the upper tube sheet and the 15th tube support plate. The tubes selected for inspection shall represent the entire circumference of the steam generator and shall total at least 150 peripheral tubes.

4.4.5.8 Visual inspections of the secured internal auxiliary feedwater header, header to shroud attachment welds, and the external header thermal sleeves shall be performed on each steam generator through the auxiliary feedwater injection penetrations.

These inspections shall be performed during the third and fourth refueling outages and at the ten-year ISI.

TABLE 4.4-1

MINIMUM NUMBER OF STEAM GENERATORS TO BE
INSPECTED DURING INSERVICE INSPECTION

Preservice Inspection	No			Yes		
No. of Steam Generators per Unit	Two	Three	Four	Two	Three	Four
First Inservice Inspection	All			One	Two	Two
Second & Subsequent Inservice Inspections	One[1]			One[1]	One[2]	One[3]

Table Notation:

1. The inservice inspection may be limited to one steam generator on a rotating schedule encompassing 3 N % of the tubes (where N is the number of steam generators in the plant) if the results of the first or previous inspections indicate that all steam generators are performing in a like manner. Note that under some circumstances, the operating conditions in one or more steam generators may be found to be more severe than those in other steam generators. Under such circumstances the sample sequence shall be modified to inspect the most severe conditions.

2. The other steam generator not inspected during the first inservice inspection shall be inspected. The third and subsequent inspections should follow the instructions described in 1 above.

3. Each of the other two steam generators not inspected during the first inservice inspections shall be inspected during the second and third inspections. The fourth and subsequent inspections shall follow the instructions described in 1 above.

TABLE 4.4-2

STEAM GENERATOR TUBE INSPECTION (1)

1ST SAMPLE INSPECTION			2ND SAMPLE INSPECTION		3RD SAMPLE INSPECTION	
Sample Size	Result	Action Required	Result	Action Required	Result	Action Required
A minimum of S Tubes per S.G. (1)	C-1	None	N/A	N/A	N/A	N/A
	C-2	Plug or repair by sleeving defective tubes and inspect additional 2S tubes in this S.G.	C-1	None	N/A	N/A
			C-2	Plug or repair by sleeving defective tubes and inspect additional 4S tubes in this S.G.	C-1	None
					C-2	Plug or repair by sleeving defective tubes
					C-3	Perform action for C-3 result of first sample
			C-3	Perform action for C-3 result of first sample	N/A	N/A
	C-3	Inspect all tubes in this S.G., plug or repair by sleeving defective tubes and inspect 2S tubes in each other S.G. ~~Prompt notification to NRC pursuant to specification 6.9.1~~	All other S.G.s are C-1	None	N/A	N/A
			Some S.G.s C-2 but no additional S.G. are C-3	Perform action for C-2 result of second sample	N/A	N/A
			Additional S.G. is C-3	Inspect all tubes in each S.G. and plug or repair by sleeving defective tubes. ~~Prompt notification to NRC pursuant to specification 6.9.1~~	N/A	N/A

Report to the NRC prior to resumption of plant operation.

(1) N = 3 $\frac{N}{n}$ % Where N is the number of steam generators in the unit, and n is the number of steam generators inspected during an inspection.

(2) For tubes inspected pursuant to 4.4.5.2.b: No action is required for C-1 results. For C-2 results in one or both steam generators plug or repair by sleeving defective tubes. For C-3 results in one or both steam generators, plug or repair by sleeving defective tubes and provide prompt notification of NRC pursuant to Specification 6.6.

3/4.4.4 PRESSURIZER

A steam bubble in the pressurizer ensures that the RCS is not a hydraulically solid system and is capable of accommodating pressure surges during operation. The steam bubble also protects the pressurizer code safety valves and pilot operated relief valve against water relief.

The low level limit is based on providing enough water volume to prevent a reactor coolant system low pressure condition that would actuate the Reactor Protection System or the Safety Feature Actuation System. The high level limit is based on providing enough steam volume to prevent a pressurizer high level as a result of any transient.

The pilot operated relief valve and steam bubble function to relieve RCS pressure during all design transients. Operation of the pilot operated relief valve minimizes the undesirable opening of the spring-loaded pressurizer code safety valves.

3/4.4.5 STEAM GENERATORS

The Surveillance Requirements for inspection of the steam generator tubes ensure that the structural integrity of this portion of the RCS will be maintained. The program for inservice inspection of steam generator tubes is based on a modification of Regulatory Guide 1.83, Revision 1. Inservice inspection of steam generator tubing is essential in order to maintain surveillance of the conditions of the tubes in the event that there is evidence of mechanical damage or progressive degradation due to design, manufacturing errors, or inservice conditions that lead to corrosion. Inservice inspection of steam generator tubing also provides a means of characterizing the nature and cause of any tube degradation so that corrective measures can be taken. A process equivalent to the inspection method described in Topical Report BAW-2120P will be used for inservice inspection of steam generator tube sleeves. This inspection will provide ensurance of RCS integrity.

The plant is expected to be operated in a manner such that the secondary coolant will be maintained within those chemistry limits found to result in negligible corrosion of the steam generator tubes. If the secondary coolant chemistry is not maintained within these chemistry limits, localized corrosion may likely result in stress corrosion cracking. The extent of cracking during plant operation would be limited by the limitation of steam generator tube leakage between the primary coolant system and the secondary coolant system (primary-to-secondary leakage = 1 GPM). Cracks having a primary-to-secondary leakage less than this limit during operation will have an adequate margin of safety to withstand the loads imposed during normal

operation and by postulated accidents. Operating plants have demonstrated that primary-to-secondary leakage of 1 GPM can be detected by monitoring the secondary coolant. Leakage in excess of this limit will require plant shutdown and an unscheduled inspection, during which the leaking tubes will be located and plugged or repaired by sleeving in the affected areas.

Wastage-type defects are unlikely with proper chemistry treatment of the secondary coolant. However, even if a defect should develop in service, it will be found during scheduled inservice steam generator tube examinations. As described in Topical Report BAW-2120P, degradation as small as 20% through wall can be detected in all areas of a tube sleeve except for the roll expanded areas and the sleeve end, where the limit of detectability is 40% through wall. Tubes with imperfections exceeding the repair limit of 40% of the nominal wall thickness will be plugged or repaired by sleeving the affected areas. Davis-Besse will evaluate, and as appropriate implement, better testing methods which are developed and validated for commercial use so as to enable detection of degradation as small as 20% through wall without exception. Until such time as 20% penetration can be detected in the roll expanded areas and the sleeve end, inspection results will be compared to those obtained during the baseline sleeved tube inspection.

Whenever the results of any steam generator tubing inservice inspection fall into Category C-3, these results ~~will~~ Shall be ~~promptly~~ reported to the Commission ~~pursuant to Specification 6.9.1~~ prior to resumption of plant operation. Such cases will be considered by the Commission on a case-by-case basis and may result in a requirement for analysis, laboratory examinations, tests, additional eddy-current inspection, and revision of the Technical Specifications, if necessary.

The steam generator water level limits are consistent with the initial assumptions in the FSAR.