



Commonwealth Edison  
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Downers Grove, Illinois 60515

April 19, 1991

Dr. Thomas E. Murley, Director  
Office Of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Attn: Document Control Desk

Subject: Byron Station Units 1 and 2  
Braidwood Station Units 1 and 2  
Supplement to Application for Amendment to  
Facility Operating Licenses  
NPF-37, NPF-66, NPF-72 and NPF-77  
Appendix A, Technical Specifications  
TAC Nos. M72042, 72043, 72044, 72045  
NRC Docket Nos. 50-454, 50-455, 50-456 and 50-457

References: (a) November 30, 1988, S.C. Hunsader letter  
to T.E. Murley  
(b) May 15, 1989, L.N. Olshan letter  
to T.J. Kovach  
(c) May 30, 1990, S.C. Hunsader letter  
to T.E. Murley

Dear Dr. Murley

In reference (a) pursuant to 10 CFR 50.90, Commonwealth Edison (Edison) proposed to amend Appendix A, Technical Specifications, of Facility Operating Licenses NPF-37, NPF-66, NPF-72 and NPF-77. The proposed amendment requested a change to Technical Specifications 3.0.4, 4.0.3 and 4.0.4 and the Technical Specifications that are affected by these sections. The changes were requested and made per the requirements of Generic Letter 87-09, to remove unnecessary restrictions on operational mode changes and to prevent unnecessary plant shutdowns when surveillance intervals have been inadvertently exceeded.

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April 19, 1991

In reference (b), the NRC staff made a request for additional information. In reference (c), Edison responded to that request. Based on a conference call with NRR on March 21, 1991 Edison has reviewed the amendment request and has reformatting our request to allow for easier review and also provide additional information to more adequately justify each change.

Attachment A provides additional detail and corrections to attachment A of reference (c). These are specifications that currently contain a 3.0.4 not applicable statement which is being deleted. For these specifications transition to a higher mode of applicability is currently allowed, and no supplemental information is being supplied. The change to these specifications is purely administrative. In addition, we are deleting specification 3.1.1.3 from the amendment. This will stand as shown in Braidwood Amendment 23 and Byron Amendment 36 which were issued after reference (a) was submitted.

Attachment B provides corrections to Attachment A of reference (a). The only change made by this supplement is to add page 3/4 3-39 to the list of revised pages. This page was omitted from the list on Attachment A of reference (a).

Attachment C, contains a list of all Technical Specification pages being revised and the justification for each change.

Enclosed are Byron Technical Specification pages 3/4 3-39 which was omitted in reference (a) and B 3/4-01. Please replace Byron Technical Specification page 3/4-01, inadvertently included with the bases, with page B 3/4-01.

Commonwealth Edison is notifying the State of Illinois of our application for this amendment by transmitting a copy of this letter and its attachments to the designated State Official.

To the best of my knowledge and belief the statements contained here are true and correct. In some respects, these statements are not based on my personal knowledge but upon information received from other Commonwealth Edison and contractor employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Dr. Thomas E. Murley

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April 19, 1991

Please direct any questions you may have concerning this matter to this office.

Very truly yours,

*Allen R. Checca*

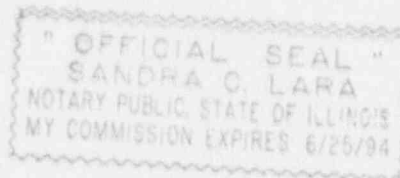
Allen R. Checca  
Nuclear Licensing Administrator

Attachments: A) Technical Specifications that contain a 3.0.4 not applicable statement.  
B) List of Revised Technical Specifications  
C) Justification for Changes to Technical Specifications

Enclosures: Byron Technical Specification Page 3/4 3-39  
Byron Technical Specification Page B3/4-01

cc: Wayne Kropp-Byron  
Steve Dupont-Braidwood  
R. Pulsifer-NRR  
A. Hsia-NRR  
W. Shafer-RIII  
M. Parker-IDNS

State of IL, County of DuPage  
Signed before me on this 14th day  
of April, 1991  
Notary Public *[Signature]*



# ATTACHMENT A

## TECHNICAL SPECIFICATIONS THAT CONTAIN A 3.0.4 NOT APPLICABLE STATEMENT

### FACILITY LICENSES NPF-37, NPF-66, NPF-72, AND NPF-77

The following Technical Specifications contain a statement that the provisions of Specification 3.0.4 are not applicable. For these specifications transition into a higher mode of applicability is currently allowed. The change to these specifications is purely administrative.

<u>BRAIDWOOD</u> <u>PAGE #</u>	<u>SPECIFICATION</u> <u>#</u>	<u>BYRON</u> <u>PAGE #</u>	<u>DESCRIPTION</u>
2-2	3.2.4	2-2	Quadrant Power Tilt Ratio
3-2	3.3.1	3-2	Reactor Trip System Instrumentation. Table
3-3		3-3	3.3-1
3-4		3-4	Items 2.a, 2.b, 3, 4, 7, 8, 9, 10, 11, 12.a, 12.b,
3-3		3-5	13, 14, 15, 16.a, 16.b, 18
3-12		3-12	
3-15	3.3.2	3-15	Engineered Safety Features Actuation System
3-17		3-17	Instrumentation. Table 3.3-3
3-18		3-18	Items 1.c, 1.d, 1.e, 4.c, 4.d, 4.e, 5.b, 6.c.1,
3-19		3-19	6.c.2, 6.d, 6.f, 6.g, 8.a, 8.b.
3-21		3-21	
3-39	3.3.3.1	3-39	Radiation Monitoring for Plant Operations
3-43	3.3.3.2	3-43	Movable Incore Detectors
3-44	3.3.3.3	3-44	Seismic Instrumentation
3-47	3.3.3.4	3-47	Meteorological Instrumentation
3-58	3.3.3.8	3-56	Loose-Part Detection System
3-59	3.3.3.9	3-57	Radioactive Liquid Effluent Monitoring
			Instrumentation
3-64	3.3.3.10	3-62	Radioactive Gaseous Effluent Monitoring
			Instrumentation
3-73	3.3.3.11	3-71	High Energy Line Break Isolation Sensors
7-26	3.7.9	7-28	Sealed Source Contamination
9-8	3.9.7	9-8	Crane Travel - Spent Fuel Storage Facility
9-11	3.9.9	9-11	Contamination Purge Isolation System
9-13	3.9.11	9-13	Water Level-Storage Pool
9-14	3.9.12	9-14	Fuel Handling Building Exhaust Filter Plenums
11-1	3.11.1.1	11-1	Liquid Effluents
11-6	3.11.1.2	11-6	Dose
11-7	3.11.1.3	11-7	Liquid Radwaste Treatment System
11-8	3.11.1.4	11-8	Liquid Holdup Tanks
11-9	3.11.2.1	11-9	Gaseous Effluents
11-13	3.11.2.2	11-13	Dose-Noble Gases
11-14	3.11.2.3	11-14	Dose-Iodine-131 and 133, Tritium, and
			Radioactive Material in Particular Form
11-15	3.11.2.4	11-15	Gaseous Radwaste Treatment System
11-16	3.11.2.5	11-16	Explosive Gas Mixture
11-17	3.11.2.6	11-17	Gas Decay Tanks
11-18	3.11.3	11-18	Solid Radioactive Wastes
11-19	3.11.4	11-19	Total Dose
12-2	3.12.1	12-2	Monitoring Program
12-13	3.12.2	12-13	Land Use Census
12-14	3.12.3	12-14	Interlaboratory Comparison Program

ATTACHMENT B

PROPOSED CHANGES TO APPENDIX A

TECHNICAL SPECIFICATIONS OF

FACILITY LICENSES NPF-37, NPF-66, NPF-72, AND NPF-77

BYRON STATION

Revised Pages:

3/4 0-1  
3/4 0-2  
3/4 2-2  
3/4 2-6  
3/4 2-9  
3/4 2-12  
3/4 3-2  
3/4 3-3  
3/4 3-4  
3/4 3-5  
3/4 3-12  
3/4 3-15  
3/4 3-17  
3/4 3-18  
3/4 3-19  
3/4 3-21  
3/4 3-39  
3/4 3-43  
3/4 3-44  
3/4 3-47  
3/4 3-56  
3/4 3-57  
3/4 3-62  
3/4 3-71  
3/4 7-28  
3/4 9-8  
3/4 9-11  
3/4 9-13  
3/4 9-14  
3/4 11-1  
3/4 11-6  
3/4 11-7  
3/4 11-8  
3/4 11-9  
3/4 11-13  
3/4 11-14  
3/4 11-15  
3/4 11-16  
3/4 11-17  
3/4 11-18  
3/4 11-19  
3/4 12-02  
3/4 12-13  
3/4 12-14

BRAIDWOOD STATION

Revised Pages:

3/4 0-1  
3/4 0-2  
3/4 2-2  
3/4 2-6  
3/4 2-9  
3/4 2-12  
3/4 3-2  
3/4 3-3  
3/4 3-4  
3/4 3-5  
3/4 3-12  
3/4 3-15  
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3/4 3-58  
3/4 3-59  
3/4 3-64  
3/4 3-73  
3/4 7-26  
3/4 9-8  
3/4 9-11  
3/4 9-13  
3/4 9-14  
3/4 11-1  
3/4 11-6  
3/4 11-7  
3/4 11-8  
3/4 11-9  
3/4 11-13  
3/4 11-14  
3/4 11-15  
3/4 11-16  
3/4 11-17  
3/4 11-18  
3/4 11-19  
3/4 12-02  
3/4 12-13  
3/4 12-14

Bases pages B 3/4 0-1 through B 3/4 0-3 are being replaced with B 3/4 0-1 through B 3/4 0-6.



## ATTACHMENT C

The changes to each Technical Specification page are listed along with the justification. For ease of review, they are in page number order.

Page numbers are common for Byron (BY) and Braidwood (BW) except as noted.

### Page 3/4 0-1

#### 3/4 Limiting Conditions for Operation and Surveillance Requirements

##### Justification for changes to 3.0.4

As a part of recent initiatives to improve Technical Specifications, the NRC, in cooperation with the Atomic Industrial Forum (AIF), has developed a program for Technical Specification improvements. One of the elements of this program is the implementation of short-term improvements to resolve immediate concerns that have been identified in investigations of Technical Specification problems by both NRC and AIF. The guidance provided in Generic Letter 87-09 addresses three specific problems that have been encountered with the general requirements on the applicability of Limiting Conditions for Operation (LCO) and Surveillance Requirements in sections 3.0 and 4.0 of the Standardized Technical Specifications. The proposed changes to Technical Specifications 3.0.4, 4.0.3 and 4.0.4 address these problems.

The first change involves revising Technical Specification 3.0.4, the bases section for 3.0.4, and several specifications that reference 3.0.4. This change addresses the problem, as stated in Generic Letter 87-09, involving unnecessary restrictions on mode changes by Specification 3.0.4, and inconsistent application of exceptions to it. The practical solution is to change this specification to define the conditions under which its requirements apply. With respect to unnecessary mode changes, Specification 3.0.4 unduly restricts facility operation when conformance with Action Requirements provides an acceptable level of safety for continued operation. For an LCO that has Action Requirements permitting continued operation for an unlimited period of time, entry into an operational mode or other specified condition of operation should be permitted in accordance with Action Requirements. The solution also resolves the problem of inconsistent application of exceptions to Specification 3.0.4:

- (a) which delays startup under conditions in which conformance to the Action Requirements established an acceptable level of safety for unlimited continued operation of the facility; and
- (b) which delays a return to power operation when the facility is required to be in a lower mode of operation as a consequence of other Action Requirements.

This change will prevent delays in startups under conditions in which conformance to the Action Requirements established an acceptance level of safety for unlimited continued operation of the facility.

## ATTACHMENT C (continued)

### Surveillance Requirements

Page 3/4 0-2

Justification for changes to 4.0.3

The second change involves revising Technical Specification 4.0.3, and its associated bases. This change addresses the problem as stated in Generic Letter 87-09, involving unnecessary shutdowns caused by Specification 4.0.3 when surveillances intervals are inadvertently exceeded. The solution is to clarify the applicability of the Action Requirements, to specify a specific circumstance, and to clarify when a missed surveillance constitutes a violation of the Operability Requirements of an LCO. It is overly conservative to assume that systems or components are inoperable when a surveillance has not been performed because the vast majority of surveillances do in fact demonstrate that systems or components are operable. When a surveillance is missed, it is primarily a question of operability that has not been verified by the performance of a Surveillance Requirement. Because the allowable outage time limits of some Action Requirements do not provide an appropriate time for performing a missed surveillance before Shutdown Requirements apply, the Technical Specification should include a time limit that allows a delay of required actions to permit the performance of the missed surveillance based on consideration of plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and, of course, the safety significance of the delay in completing the surveillance.

In addition, Generic Letter 87-09 discusses, that if entry into an Action Statement that requires the unit to enter another mode or condition of operation where a surveillance is not in frequency, then revised Specification 4.0.3 will allow 24 hours for completion before the Action Statement applies. It is our understanding that in this scenario, the surveillance required by the new Action Statement would not constitute a missed surveillance resulting in any reporting requirements or enforcement action.

A similar situation that was not addressed in Generic letter 87-09 but was discussed in a telephone call between Edison and the NRC on November 15, 1988, was the situation where the unit trips and enters a mode where equipment is required to be operable but the surveillance is not in frequency. For Example, the source range instruments are required in Modes 2 (below P-6), 3, 4, and 5. When the unit operating in Mode 1 for a period of time the source range instruments are not required operable but if the unit trips, in Mode 3, the instruments are required to be operable but the surveillance is out of frequency. It is Edison's understanding that the NRC indicated it would be acceptable to perform the surveillance within 24 hours after entry into Mode 3. This situation would not constitute a missed surveillance resulting in any reporting requirements or enforcement action. For a normal shutdown, the evolution should be controlled such that the required surveillances would be performed prior to entering the mode where the equipment would be required to be operable. It is not necessary to do the Analog Channel Operational test, quarterly for the source range instruments when the unit is in Mode 1.

## ATTACHMENT C (continued)

### Justification for changes to 4.0.4

The third change involves revising Technical Specification 4.0.3, 4.0.4 and their associated bases sections to eliminate two possible conflicts between Specification 4.0.3 and 4.0.4. The first conflict as stated in Generic Letter 87-09 arises because Specification 4.0.4 prohibits entry into an operational mode or other specified condition when Surveillance Requirements have not been performed within the specified surveillance interval. A conflict with this requirement exists when a mode change is required as a consequence of Action Requirements, and when the Surveillance Requirements that become applicable have not been performed within the specified surveillance interval. Specification 4.0.4 should not be used to prevent passage through, or to operational modes as required to comply with action requirements because to do so would:

- (a) increase the potential for a plant upset; and
- (b) would challenge safety systems.

Also, certain surveillances should be allowed to be performed during a shutdown to comply with Action Requirements. Along with the modification of Specification 4.0.3 to permit a delay in the applicability of Action Requirements, Specification 4.0.4 has been clarified to allow passage through or to operational modes as required to comply with Action Requirements.

A second conflict as stated in Generic Letter 87-09 could arise because, when Surveillance Requirements can only be completed after entry into a mode or specified condition for which the Surveillance Requirements apply, an exception to the requirements of Specification 4.0.4 is allowed. However, upon entry into this mode or condition, the requirements of Specification 4.0.3 may not be met because the Surveillance Requirements may not have been performed within the allowed surveillance interval. It is not the intent of Specification 4.0.3 that the Action Requirements preclude the performance of surveillances allowed under any exception to Specification 4.0.4. Allowance for a delay in Specification 4.0.3 for applicability of Action Requirements will provide an appropriate time limit for the completion of those Surveillance Requirements that become applicable as a consequence of allowance of any exceptions to Specification 4.0.4.

It has been noted that some surveillance that state "4.0.4 not applicable", do involve performance times in excess of the 24 hours allowed by this change and Generic Letter 87-09. These specific surveillances have been identified, and changes are proposed to bound both the conditions required to perform the surveillance. This should provide an acceptable means to establish required conditions, as well as set a reasonable completion requirement. These limits are all based on prior experience, vendor recommendations for conditions to perform them under, and engineering judgement.



## ATTACHMENT C (continued)

### Axial Flux Difference

Page 3/4 2-2

#### Justification for Changes to 4.2.1.3

This change is being proposed as a clarification of how the target flux values are determined. The initial Delta I Target value is derived from design predictions. This is necessary because it is desirable to have some limits in place for the time period between unit restart from refueling and the establishment of proper plant conditions necessary to complete the surveillance. This surveillance requires equilibrium xenon conditions with the control rods positioned at or near their normal position to support operation at a high power level. These prerequisites make it necessary for the unit to transition into the mode of applicability and achieve some level of core burnup prior to adjusting the target flux difference. This change represents a clarification, and does not seek any additional relief or latitude. The approval of this change will not result in a change in the manner that the surveillance is currently conducted, the methods in which the target flux is currently determined, or the scheduling of the surveillance. This change is considered to be consistent with Generic Letter 87-09 in that it provides a clarification to the specification which removes any confusion about when the surveillance is required to be performed.

This change negates the need for a 4.0.4 exemption because the initial determination of target flux difference will be predicted prior to the entry into Mode 1. Should a shutdown occur, no effective full power days will be accumulated which allows the unit to return to power based on the last surveillance.

#### Justification for changes to 4.2.1.4

As currently written, this specification does not prevent charging modes. Deleting the reference to 4.0.4 is purely administrative in nature.

## ATTACHMENT C (continued)

### Heat Flux Hot Channel Factor - $F_q(z)$

Page 3/4 2-6

#### Justification for Changes to 4.2.2.2.a

This surveillance requirement is modified in a manner that differs from the blanket 24 hours allowance provided in Generic Letter 87-09. This change establishes an upper bound with regards to power ascension, rather than a time limit. A time limit is inappropriate for this surveillance given the evolutions necessary to restart a unit after a refueling. The time required to achieve the plant conditions necessary to accomplish this surveillance requirement and derive meaningful results is dependent on several factors. Among these are: the length of time necessary to accomplish low power physics testing, duration of "hold" periods necessary to achieve optimum secondary side chemistry conditions, and the availability of secondary side equipment to support operation at higher power levels. For these reasons, a limiting power level is specified. This power level was chosen because it represents a convenient plateau to accomplish the power distribution map in parallel with preparation of secondary side equipment to support operation at higher power levels. This power level is appropriate because meaningful results will be obtained and significant margin exists between existing peaking factors and limiting values. Approval of this change will provide a well defined window for accomplishment of the flux map without unnecessarily prolonging the power ascension sequence, and will also provide for baseline data prior to the unit approaching full power, where the peaking factors are limiting.

Page 3/4 2-9 RCS Flow Rate and Nuclear Enthalpy Rise Hot Channel Factor

#### Justification for Changes to 4.2.3.5

This surveillance requirement is being modified to establish a limiting power level, as opposed to a time limit for the same reasons stated for surveillance requirement 4.2.2.2.a. This power level was selected because the heat balance will yield more representative results than if accomplished at a lower power level. This is due to the increase in secondary side efficiency that is realized when plant parameters approach their design values. At this power level, the DNB ratio does not approach limiting values, due to the lower core exit temperatures. Additionally, the flow in each loop is monitored by elbow meters, and indication is provided on the main control board. While the accuracy of this flow measurement system is not optimum, it does provide a means of detecting any significant flow anomalies. Normal maintenance conducted on the reactor coolant pumps, RCS piping and vessel internals during refueling outages is not of the nature that would significantly alter the loop flow characteristics. In addition, significant reductions in RCS flow initiate a reactor trip to protect against high power-low flow conditions. By establishing the limiting level, assurance is provided that the heat balance will be more representative of full power values, and the RCS flowrate will be calculated prior to operation at full power, where the DNBR becomes limiting.

## ATTACHMENT C (continued)

### Quadrant Power Tilt Ratio

Page 3/4 2-12

Justification for Changes to 3.2.4.d

This action statement currently states that 3.0.4 does not apply. This statement is being deleted. For this specification transition to a higher mode of applicability is currently allowed, therefore, this change does not provide any additional relief. The change is purely administrative in nature.

Page 3/4 3-2

### Reactor Trip System Instrumentation

Page 3/4 3-3

Page 3/4 3-4

Page 3/4 3-5

Change to Table 3.3-1 items:

- 2.a Power range, neutron flux high setpoint
- 2.b Power range, neutron flux low setpoint
- 3 Power range, neutron flux high positive rate
- 4 Power range, neutron flux high negative rate
- 7 Overtemperature delta T
- 8 Overpower delta T
- 9 Pressurizer Pressure-low (above P-7)
- 10 Pressurizer Pressure-High
- 11 Pressurizer Water Level-High (above P-8)
- 12.a Reactor coolant flow-low single loop (above P-8)
- 12.b Reactor coolant flow-low two loops (above P-7 and below P-8)
- 13 Steam Generator Water Level-Low-Low
- 14 Undervoltage-Reactor Coolant Pumps (above P-7)
- 15 Underfrequency-Reactor Coolant Pumps (above P-7)
- 16 Turbine Trip (above P-7 or P-8)
  - a Emergency Trip Header Pressure
  - b Turbine Throttle Valve Closure
- 18 Reactor Coolant Pump Breaker Position Trip (above P-7)

Justification for changes to Table 3.3-1

See Specification 3.2.4.d

## ATTACHMENT C (continued)

### Page 3/4 3-12 Reactor Trip Instrumentation Surveillance Requirements

Justification for Changes to Table 4.3.-1

Table Notations 3 and 6

Note 3 is being changed to provide further definition regarding the initial performance of the incore-excore comparison following a refueling outage. The 24 hour allowance generically granted by Generic Letter 87-09 is insufficient to establish the proper plant conditions to conduct this surveillance and extract representative results. Because the axial flux profile tends to shift with core power, the resulting axial power shape at 75% power will more closely represent the full power axial flux shape. Additionally, a substantial margin is maintained between the power level at which the surveillance is conducted, and the 109% high flux trip. This margin is considered sufficient to ensure that the core will be operated within its design limits prior to the optimization of the nuclear instrumentation indication based on the incore results. The tracking of the surveillance interval on the basis of EFPD is requested because variations in the axial flux distribution are a function of core burnup. This method is more meaningful than a simple calendar frequency because extended power ascension delays or reduced power operation may result in a small change in core burnup. Because of the burnup-dependent nature of the measured parameter, performing the surveillance on an EFPD basis will ensure that the incore-excore comparison will be performed at approximately equal exposure intervals over the duration of a fuel cycle. Note 6 is being modified in the same manner for the same reasons.



ATTACHMENT C (continued)

Page 3/4 3-15 Engineered Safety Features Actuation System Instrumentation

Page 3/4 3-17

Page 3/4 3-18

Page 3/4 3-19

Page 3/4 3-21

Changes to Table 3.3-3 Items

1. Safety Injection
  - c. Containment Pressure-high 1
  - d. Pressurizer Pressure-low (above P-11)
  - e. Steam Line Pressure-low (above P-11)
4. Steam Line Isolation
  - c. Containment Pressure-High-2
  - d. Steam Line Pressure-low (above P-11)
  - e. Steam Line Pressure-Negative Rate-High (below P-11)
5. Turbine Trip and Feedwater Isolation
  - b. Steam Generator Water Level-high-high (P-14)
6. Auxiliary Feedwater
  - c. Steam Generator Water Level-Low-Low
    - 1) Start Motor Drive Pump
    - 2) Start Diesel Driven Pump
  - d. Undervoltage-RCP Bus-Start Motor Driven Pump and Diesel Driven Pump
  - g. Auxiliary Feedwater Pump Suction Pressure-Low (Transfer to Essential Service Water)
8. Loss of Power
  - a. ESF Bus Undervoltage
  - b. Grid Degraded Voltage

Justification for Changes to Table 3.3-3

See Specification 3.2.4.d

Page 3/4 3-39 Radiation Monitoring For Plant Operations

Justification for Changes to 3.3.3.1 Action C

See Specification 3.2.4.d

Page 3/4 3-43 Movable Incore Detectors

Justification for Changes to 3.3.3.2 Action

See Specification 3.2.4.d

ATTACHMENT C (continued)

**Page 3/4 3-44** Seismic Instrumentation

Justification for Changes to 3.3.3.3 Action b

See Specification 3.2.4.d

**Page 3/4 3-47** Meteorological Instrumentation

Justification for Changes to 3.3.3.4 Action b

See Specification 3.2.4.d

**BW Page 3/4 3-58** Loose Part Detection System  
**BY Page 3/4 3-53**

Justification for Changes to 3.3.3.8 Action b

See Specification 3.2.4.d

**BW Page 3/4 3-59** Radioactive Liquid Effluent Monitoring Instrumentation  
**BY Page 3/4 3-57**

Justification for Changes to 3.3.3.9 Action C

See Specification 3.2.4.d

**BW Page 3/4 3-64** Radioactive Gaseous Effluent Monitoring Instrumentation  
**BY Page 3/4 3-62**

Justification for Changes to 3.3.3.10 Action C

See Specification 3.2.4.d

**BW 3/4 3-73** High Energy Line Break L-Isolation Sensors  
**BY 3/4 3-71**

Justification for Changes to 3.3.3.11 Action C

See Specification 3.2.4.d

ATTACHMENT C (continued)

BW Page 3/4 7-26    Sealed Source Contamination  
BY Page 3/4 7-28

Justification for Changes to 3.7.9 Action

See specification 3.2.4.d

Page 3/4 9-8    Crane Travel-Spent Fuel Storage Facility

Justification for Changes to 3.9.7 Action b

See Specification 3.2.4.d

Page 3/4 9-11    Containment Purge Isolation System

Justification for Changes to 3.9.9 Action b

See Specification 3.2.4.d

Page 3/4 9-13    Water Level-Storage Pool

Justification for Changes to 3.9.11 Action b

See Specification 3.2.4.d

Page 3/4 9-14    Fuel Handling Building Exhaust Filter Plenums

Justification for Changes to 3.9.12 Action C

See Specification 3.2.4.d

Page 3/4 11-1    Liquid Effluents

Justification for Changes to 3.11.1.1 Action b

See Specification 3.2.4.d

Page 3/4 11-6    Dose

Justification for Changes to 3.11.1.2

See Specification 3.2.4.d

ATTACHMENT C (continued)

**Page 3/4 11-7** Liquid Radwaste Treatment System

Justification for Changes to 3.11.1.3 Action b

See Specification 3.2.4.d

**Page 3/4 11-8** Liquid Holdup Tanks

Justification for Changes to 3.11.1.4 Action b

See Specification 3.2.4.d

**Page 3/4 11-9** Gaseous Effluents

Justification for Changes to 3.11.2.1 Action b

See Specification 3.2.4.d

**Page 3/4 11-13** Dose-Noble Gases

Justification for Changes to 3.11.2.2. Action b

See Specification 3.2.4.d

**Page 3/4 11-14** Dose-Iodine-131 and 133, Tritium, and Radioactive Material in Particulate Form

Justification for Changes to 3.11.2.3 Action b

See Specification 3.2.4.d

**Page 3/4 11-15** Gaseous Radwaste Treatment System

Justification for Changes to 3.11.2.4 Action b

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Justification for Changes to 3.11.2.5 Action C

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Justification for Changes to 3.11.2.6

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Justification for Changes to 3.11.3 Action C

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Justification for Changes to 3.11.4 Action b

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Justification for Changes to 3.12.1 Action d

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Justification for Changes to 3.12.3 Action b

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