ATTACHMENT

EDWIN I. HATCH NUCLEAR PLANT
UNIT 1 AND UNIT 2

IMPROVED TECHNICAL SPECIFICATIONS

Revision F

Edwin I. Hatch Nuclear Plant
Improved Technical Specifications

Revision Insertion Instructions
Revision F

Page	Instruction
U1 Improved Specifications	
Cover sheet	Discard
2.0-1	Replace
3.0-1	Replace
3.0-5	Replace
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5.0-3	Replace
5.0-7	Replace
U1 Improved Bases	
Cover sheet	Discard
B 3.0-5	Replace
B 3.0-6A	Add
B 3.0-13	Replace
B 3.0-14A	Add
B 3.0-15	Replace
U1 CTS Markup & DOC[a]	
Cover sheet	Discard
6-12 (8 of 9)	Replace
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ITS 2.0 DOC: 1	Replace
ITS 2.0 DOC: 1A	Add
Insert 3.0-2 (3 of 8)	Replace
Insert 3.0-5 (7 of 8)	Replace
ITS 3.8.1 DOC: 2	Replace
ITS 3.8.1 DOC: 7	Replace
6-1 (1 of 2)	Replace
Insert 1 for ITS 5.1	Replace
ITS 5.1 DOC: 1	Replace
6-1 (1 of 7)	Replace
6-3 (3 of 7)	Replace
Insert 2 (7 of 7)	Replace
ITS 5.2 DOC: 1	Replace
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ITS 5.5.1 DOC: 1	Replace

a. In replacing each CTS page, reference the upper right corner for the appropriate ITS section.

Page	Instruction
U1 No Significant Hazards Determination	
Cover sheet	Discard
ITS 3.8.1: 5	Replace
U2 Improved Specifications	
Cover sheet	Discard
2.0-1	Replace
3.0-1	Replace
3.0-5	Replace
5.0-1	Replace
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U2 Improved Bases	
Cover sheet	Discard
B 3.0-5	Replace
B 3.0-6A	Add
B 3.0-13	Replace
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B 3.0-15	Replace
U2 CTS Markup & DOC[a]	
Cover sheet	Discard
6-11 (6 of 7)	Replace
6-12 (7 of 7)	Replace
ITS 2.0 DOC: 1	Replace
ITS 2.0 DOC: 1A	Add
Insert 3/4 0-1(2) (3 of 9)	Replace
Insert 3/4 0-2 (7 of 9)	Replace
ITS 3.0 DOC: 3	Replace
ITS 3.0 DOC: 6	Replace
ITS 3.0 DOC: 7	Replace
ITS 3.0 DOC: 7A	Add
ITS 3.8.1 DOC: 2	Replace
ITS 3.8.1 DOC: 9	Replace
6-1 (1 of 2)	Replace
Insert 1 for ITS 5.1	Replace
ITS 5.1 DOC: 1	Replace
6-1 (1 of 6)	Replace
6-3 (3 of 6)	Replace
Insert 2 for ITS 5.2	Replace
ITS 5.2 DOC: 1	Replace
6-22 (1 of 2)	Replace
ITS 5.5.1 DOC: 1	Replace

a. In replacing each CTS page, reference the upper right corner for the appropriate ITS section.

Revision Insertion Instructions
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Page	Instruction
U2 No Significant Hazards Determination	
Cover sheet	Discard
ITS 3.0: 2	Replace
ITS 3.0 DOC: 2A	Replace
ITS 3.8.1 DOC: 10	Replace
NUREG 1433 Comparison - Specifications	
Cover sheet	Discard
2.0-1	Replace
3.0-1	Replace
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5.0-1	Replace
Insert A for NUREG 5.1	Replace
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NUREG 1433 Comparison - Bases	
Cover sheet	Discard
B 3.0-5	Replace
Insert B 3.0-6 (B6)	Add
B 3.0-13	Replace
Insert B 3.0-14 (SR 3.0.4)	Replace
Insert B 3.3-163 (Inser. K)	Replace
NUREG 1433 - Justification for Deviation	
Cover sheet	Discard
ITS 3.0: 1	Replace
ITS 5.0: 1	Replace

UNIT 1 IMPROVED TECHNICAL SPECIFICATIONS

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 With the reactor steam dome pressure < 785 psig or core flow < 10% rated core flow:

THERMAL POWER shall be ≤ 25% RTP.

2.1.1.2 With the reactor steam dome pressure ≥ 785 psig and core flow ≥ 10% rated core flow:

MCPR shall be ≥ 1.07 for two recirculation loop operation or ≥ 1.08 for single recirculation loop operation.

2.1.1.3 Reactor vessel water level shall be greater than the top of active irradiated fuel.

2.1.2 Reactor Coolant System (RCS) Pressure SL

Reactor steam dome pressure shall be ≤ 1325 psig.

2.2 SL Violations

With any SL violation, the following actions shall be completed:

2.2.1 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.2 Within 2 hours:

2.2.2.1 Restore compliance with all SLs; and

2.2.2.2 Insert all insertable control rods.

2.2.3 Within 24 hours, notify the plant manager, the corporate executive responsible for overall plant nuclear safety, and the offsite review committee.

(continued)

2.0 SLs

2.2 SL Violations (continued)

2.2.4 Within 30 days, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC, the offsite review committee, the plant manager, and the corporate executive responsible for overall plant nuclear safety.

2.2.5 Operation of the unit shall not be resumed until authorized by the NRC.

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1

LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

LCO 3.0.2

Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3

When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

a. MODE 2 within 7 hours;

b. MODE 3 within 13 hours; and

c. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

LCO 3.0.4

When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required

(continued)

3.0 LCO APPLICABILITY

LCO 3.0.4 (continued)

to comply with ACTIONS or that are part of a shutdown of the unit.

Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.

LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY, the OPERABILITY of other equipment, or variables to be within limits. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the required testing.

LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.10, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

(continued)

3.0 SR APPLICABILITY (continued)

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The plant manager shall provide direct executive oversight over all aspects of Plant Hatch.

5.1.2 An assistant plant manager shall be responsible for overall unit operation, except for the Radiological Environmental Monitoring Program as described below and for delegation in writing of the succession of this responsibility during his absence. Certain plant support functions shall also be the responsibility of an assistant plant manager.

5.1.3 The plant manager or his designee shall be responsible for the Radiological Environmental Monitoring Program and for the writing of the Annual Radiological Environmental Operating Report.

5.1.4 Each of the individuals in Specification 5.1.1 through Specification 5.1.3 is responsible for the accuracy of the procedures needed to implement his responsibilities.

5.1.5 The shift superintendent shall be responsible for the control room command function. During any absence of the shift superintendent from the control room while either unit is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the shift superintendent from the control room while both units are in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including plant specific titles of those personnel fulfilling the responsibilities of the positions delineated in these Technical Specifications, shall be documented in the Plant Hatch Unit 1 FSAR;

b. An assistant plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;

c. The corporate executive responsible for Plant Hatch shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and

d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. A total of three plant equipment operators (PEOs) for the two units is required in all conditions. At least one of

(continued)

5.2 Organization

5.2.2 Unit Staff

a. (continued)

the required PEOs shall be assigned to each reactor containing fuel.

b. At least one licensed Reactor Operator (RO) shall be present in the control room for each unit that contains fuel in the reactor. In addition, while the unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

c. The minimum shift crew composition shall be in accordance with 10 CFR 50.54(m)(2)(i). Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. An individual qualified to implement radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed and non-licensed operations personnel, health physics technicians, key maintenance personnel, etc.). | D

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40 hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;

(continued)

5.2 Organization

5.2.2 Unit Staff

e. (continued)

2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by an assistant plant manager, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by an assistant plant manager or designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

f. The operations manager shall hold an active or inactive SRO license.

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs and manuals shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

a. The 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 and trip setpoints, and in the conduct of the radiological environmental monitoring program; and

b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release reports required by Specification 5.6.2 and Specification 5.6.3, respectively.

Licensee initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:

1. sufficient information to support the change(s) and appropriate analyses or evaluations justifying the change(s), and

2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and does not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

b. Shall become effective after review and acceptance by the onsite review committee and the approval of the plant manager; and

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5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in 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 (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, and Reactor Water Cleanup. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

b. System leak test requirements for each system, to the extent permitted by system design and radiological conditions, at refueling cycle intervals or less.

5.5.3 Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant; radioactive gases and particulates in plant gaseous effluents; and containment atmosphere samples under accident conditions. The program shall include the following:

a. Training of personnel;

b. Procedures for sampling and analysis; and

c. Provisions for maintenance of sampling and analysis equipment.

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UNIT 1 IMPROVED BASES

BASES

LCO 3.0.3 (continued)

assemblies in the spent fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.8 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.8 of "Suspend movement of irradiated fuel assemblies in the spent fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

a. Unit conditions are such that the requirements of the LCO would not be met in the Applicability desired to be entered; and

b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability

(continued)

BASES

LCO 3.0.4 (continued)

that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

Exceptions to LCO 3.0.4 are stated in the individual Specifications. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Specification.

LCO 3.0.4 is only applicable when entering MODE 3 from MODE 4, MODE 2 from MODE 3 or 4, or MODE 1 from MODE 2. Furthermore, LCO 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, or 3. The requirements of LCO 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, changing MODES or other specified conditions while in an ACTIONS Condition, either in compliance with LCO 3.0.4 or where an exception to LCO 3.0.4 is stated, is not a violation of SR 3.0.1 or SR 3.0.4 for those Surveillances that do not have to be performed due to the associated inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

LCO 3.0.5

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of SRs to demonstrate:

a. The OPERABILITY of the equipment being returned to service; or

b. The OPERABILITY of other equipment.

(continued)

BASES

LCO 3.0.4 (continued)

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed SRs. This Specification does not provide time to perform any other preventive or corrective maintenance.

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BASES

SR 3.0.3 (continued)

period of up to 24 hours or up to the limit of the specified Frequency, whichever is less, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.

SR 3.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the

(continued)

BASES

SR 3.0.3 (continued)

Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability. This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency, on equipment that is inoperable, does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or

(continued)

BASES

SR 3.0.4 (continued)

other specified conditions in the Applicability that result from any unit shutdown.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the

(continued)

BASES

SR 3.0.4 (continued)

Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

SR 3.0.4 is only applicable when entering MODE 3 from MODE 4, MODE 2 from MODE 3 or 4, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, or 3. The requirements of SR 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

UNIT 1 MARKUP OF CURRENT TECHNICAL SPECIFICATIONS AND DISCUSSION OF CHANGES

k. The Radiological Environmental Monitoring Program and the results thereof annually.

l. The ODCM, Process Control Program, and implementing procedures at least once per 24 months.

See Discussion of Changes for Section 5.0, Admin Controls"

AUTHORITY

6.5.2.9. The SRB shall report to and advise the Vice President-Nuclear on those areas of responsibility specified in sections 6.5.2.7. and 6.5.2.8.

RECORDS

6.5.2.10. Records of SRB activities shall be prepared, approved and distributed as indicated below:

a. Minutes of each SRB meeting shall be prepared, approved and forwarded to the Vice President-Nuclear within 14 days following each meeting.

b. Reports of reviews encompassed by section 6.5.2.7. above, shall be prepared, approved and forwarded to the Vice President-Nuclear within 14 days following completion of the review.

c. Audit reports encompassed by section 6.5.2.8. above, shall be forwarded to the Vice President-Nuclear and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6. REPORTABLE EVENT ACTION

6.6.1. The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified and/or a report submitted pursuant to the requirements of section 50.73 to 10 CFR part 50 and

b. Each REPORTABLE EVENT shall be reviewed by the PRB and the results of this review shall be submitted to the SRB, the General Manager-Nuclear Plant, and the Vice President-Nuclear.

6.7. SAFETY LIMIT VIOLATION

2.2 6.7.1. The following actions shall be taken in the event a Safety Limit is violated:

2.2.2 a. The unit shall be placed in at least HOT SHUTDOWN within 2 hours.

2.2.1 b. The Safety Limit violation shall be reported to the Commission as soon as practical and in all cases within 1 hour of occurrence.

2.2.3 The ~~General Manager-Nuclear Plant, and the Vice President-Nuclear, and the SRB~~ plant manager, and corporate executive responsible for overall plant nuclear safety, and the offsite review committee shall be notified within 24 hours.

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SAFETY LIMIT VIOLATION (Continued)

2.2.4 c. A Licensee Event Report shall be prepared pursuant to 10 CFR 50.73.

2.2.4 d. The Licensee Event Report shall be submitted to the Commission in accordance with 10 CFR 50.73, and to ~~the PRB, the CRB, the General Manager Nuclear Plant, and the Vice President Nuclear~~ the offsite review committee, the plant manager, and the corporate executive responsible for overall plant nuclear safety within 30 days of the violation.

(A.6) proposed specification 2.2.5

(A.7)

(F)

6.8. PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

See Discussion of changes in Section 5.0 "Administrative Controls"

a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

b. Refueling operations.

c. Surveillance and test activities of safety-related equipment.

d. Security Plan implementation.

e. Emergency Plan implementation.

f. Fire Protection Program implementation.

g. PROCESS CONTROL PROGRAM implementation.

n. ODCM implementation.

6.8.2 Each procedure of 6.8.1 and other procedures which the General Manager-Nuclear Plant, the AGM-PO, or the AGM-PS has determined to affect nuclear safety, and changes thereto, shall be reviewed by the PRB and approved by the appropriate member of plant management, designated by the General Manager-Nuclear Plant, the AGM-PO, or the AGM-PS prior to implementation. The General Manager-Nuclear Plant, the AGM-PO, or the AGM-PS will approve administrative procedures, security plan implementing procedures, and changes thereto. The Manager-Plant Training and Emergency Preparedness shall approve the emergency plan implementing procedures and changes thereto. All other procedures of this specification and changes thereto will be approved by the department head designated by the General Manager-Nuclear Plant, the AGM-PO, or the AGM-PS. The procedures of this specification shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1. above may be made provided:

a. The intent of the original procedure is not altered.

DISCUSSION OF CHANGES
ITS: SECTION 2.0 - SAFETY LIMITS

ADMINISTRATIVE

A.1 Reformatting and renumbering requirements are in accordance with the BWR Standard Technical Specifications, NUREG 1433. As a result, the Technical Specifications should be more readily readable and, therefore, understandable by plant operators, as well as other users. During this reformatting and renumbering process, no technical changes (either actual or interpretational) to the Technical Specifications were made unless they were identified and justified. In the specific case of the Safety Limits and Limiting Safety System Settings section, the new section number is 2.0, and the section has been retitled to only include Safety Limits (see comment A.4 below).

A.2 The reactor pressure limit unit of measure has been changed from psia to psig. In addition, the requirement for when the MCPR limit is applicable has been reduced slightly (by adding the "equal to" sign) for consistency with the BWR Standard Technical Specifications, NUREG 1433. While this change is actually more restrictive, since it is so minor, it is considered an administrative change.

A.3 The description of the actual safety limit violation has been deleted. This information is more appropriately located in the Bases and does not add any detail needed for compliance with the MCPR Safety Limit.

A.4 The technical content of this requirement is being moved to Section 3.3 of the proposed Technical Specifications in accordance with the format of the BWR Standard Technical Specifications, NUREG 1433. Any technical changes to this requirement will be addressed with the content of the proposed chapter location.

A.5 The wording has been changed from specifying the actual level to the more generic words "greater than the top of active irradiated fuel." The intent is not changed; thus, this is considered an administrative change only.

A.6 A current requirement of 10 CFR 50.36, stating that if a Safety Limit is violated, critical "Operation of the unit will not be resumed until authorized by the NRC" has been added (proposed 2.2.5). Since it is a regulation, the addition of this to the Technical Specifications is considered administrative in nature.

A.7 The current plant specific titles are changed to generic titles. ITS Section 5.2.1.a is revised to include a requirement for the plant specific titles of those personnel fulfilling the responsibilities to be included in the FSAR. The specific titles do not alter the responsibilities delineated in the Technical Specifications. Therefore, this is considered an administrative change only.

TECHNICAL CHANGE - MORE RESTRICTIVE

M.1 The limit on core flow is now specified as greater than or equal to. The current Safety Limits do not address the situation when core flow is equal

ADMINISTRATIVE
(continued)

to the limit. This change resolved a discontinuity between SL 1.1.A and SL 1.1.B in the current Safety Limits.

M.2 The APPLICABILITY of each of the SLs is extended to all MODES of operation. Although it is physically impossible to violate some SLs in some MODES, any SL violation should receive the same attention and response.

Insert 3.0A (continued)

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

M.1

F

LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.

F

LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY, or the OPERABILITY of other equipment, ~~or variables~~ to be within limits. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the required testing.

L.1

or the

D

LCO 3.0.6 When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.10, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

A.4

Insert 4.0C

SR 3.0.3 (L.3)

If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

Insert 4.0D

SR 3.0.4

(M.1) Entry into a MODE or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. This provision

(A.8) shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

(M.1) SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3. (F)

ADMINISTRATIVE
(continued)

A.4 These two possible values for the overspeed trip point are fixed by the design of the DG unit. The appropriate value (i.e., the most limiting, which is 65.5 Hz) is presented in the proposed Technical Specifications. This presentation eliminates the basis for the accepted value from the Technical Specifications, moving it to the Bases. Since there is no difference in the requirement, this is considered administrative.

A.5 The details relating to the required day tank load have been moved to a Surveillance Requirement (proposed SR 3.8.1.3). No technical changes are being made; therefore, this change is considered administrative in nature.

A.6 These requirements are governed by the definition of OPERABILITY of the DGs as explained in the SR section of the Bases. They are also covered by the respective SRs. Therefore, this "LCO" has been deleted and the change is considered administrative.

A.7 Proposed Note 1 to SRs 3.8.1.9, 3.8.1.10, and 3.8.1.17 and Note 2 to SR 3.8.1.13 have been added. This allows an engine prelube prior to DG start. The current Specifications do not prohibit this allowance and the addition is provided for clarity. As such, it is considered administrative.

A.8 The Frequency of "every scheduled refueling outage" has been modified to be "18 months", since 18 months is a normal refueling outage schedule. Note 2 to this SR ensures the SR is performed while the unit is shutdown.

A.9 Proposed Note 3 has been added to clarify that a single test of the swing DG will suffice to meet the requirements of both units. This addition provides clarity and is considered administrative only, since the test is a DG test only (e.g., it does not test unit specific components), and is similar to other notes provided in the Surveillance section. This specific clarification was explicitly added to the Unit 1 CTS by Amendment 192, dated February 24, 1994.

A.10 The requirement to perform this Surveillance after the 24 hour run has been deleted. As indicated by the * footnote, it is acceptable to perform the test after a $\geq$ 2 hour run at $\geq$ 2565 kW. Therefore, since it is already allowed to be performed in this manner, this change is considered administrative. This specific clarification was explicitly added to the Unit 1 CTS by Amendment 192, dated February 24, 1994.

A.11 The format of the proposed Technical Specifications would allow multiple Conditions to be simultaneously entered. Three or more sources could be inoperable, ACTIONS being taken in accordance with the Specification, and proposed LCO 3.0.3 entry conditions not met. To preserve the existing intent of Specification 3.9.A.7.B, ACTION H is proposed. ACTION H will cover these conditions in which the unit is outside accident analyses.

TECHNICAL CHANGE - LESS RESTRICTIVE
(continued)

L.3 The limitation on the time to reach full DG load from a manual synchronization is proposed for deletion. DG loading should be done in accordance with manufacturer's recommendations to minimize wear on the engine. Additionally, placing a time limitation on the operator to accomplish this loading results in an increased potential for error and subsequent unavailability of the DG. The starting, loading, subsequent full load operation, and automatic start and loading testing required by other Technical Specification Surveillances is adequate to confirm the DG's capability without the 120-second loading requirement. In addition, for clarity, Note 2 has been added to this SR to specifically allow gradual loading.

L.4 The Surveillance Frequency has been changed from "specified for the diesel in Specification 4.9.A.2.a.1" (effectively the DG test schedule table) to "31 days". This is because DG failures that result in a more frequent DG test frequency have no impact on this function's ability to perform its intended function.

L.5 The proposed "hot restart" test (proposed SR 3.8.1.13) does not require the restart be a simulated loss of offsite power (auto-start signal). The "hot restart" is proposed to simply be any start signal, as would be required by the monthly test. Furthermore, the specific requirement to be automatically loaded with emergency loads is excessive; the DG has demonstrated its ability to power loads while "hot" (i.e., the 24 hour run). Additionally, the automatic loading is an unnecessary repetition of other SRs which confirm the DG ability to accept sequenced loads. DG loading following the hot restart is proposed to be controlled by plant procedures and appropriate manufacturer recommendations for loading following any DG start. This revision allows greater flexibility in scheduling DG testing, while not compromising any necessary demonstration of DG capability. This change was approved as Amendment 192, dated February 24, 1994 (note this amendment renumbered this surveillance as 4.9.A.2.a.11).

L.6 The time to reach MODE 4, Cold Shutdown has been extended from 24 hours to 36 hours. This provides the necessary time to shut down and cool down the plant in a controlled and orderly manner that is within the capabilities of the unit, assuming the minimum required equipment is OPERABLE. This extra time reduces the potential for a unit upset that could challenge safety systems. This time is consistent with the BWR Standard Technical Specifications, NUREG 1433.

Specification 5.1

5.1 6.1 RESPONSIBILITY (A.3)

5.1.1 6.1.0 The General Manager-Nuclear Plant (A.3) shall provide direct executive oversight over all aspects of Plant Hatch. (A)

5.1.2 6.1.1 The Assistant General Manager-Plant Operations (AGM-PO) (A.3) shall be responsible for overall unit operation, except for the Radiological Environmental Monitoring Program as described below and for delegation in writing of the succession of this responsibility during his absence. Certain plant support functions shall be the responsibility of the Assistant General Manager-Plant Support (AGM-PS). (A)

5.1.3 6.1.2 The General Manager-Nuclear Plant (A.3) or his designee shall be responsible for the Radiological Environmental Monitoring Program as described in Specification 6.10 and for the writing of the Annual Radiological Environmental Surveillance Report. (A.1)

5.1.4 6.1.3 Each of the above-mentioned (A.2) individuals is responsible for the accuracy of the procedures needed to implement his responsibilities.

5.1.5 INSERT 1 (M.1)

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Plant Hatch Unit 2 updated FSAR.

b. The AGM-PO shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. The Vice President-Nuclear shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining and providing technical support to the plant to ensure nuclear safety.

See Discussion of Changes for ITS 5.2, Organization, in this Section.

INSERT 1 for ITS 5.1

The ~~Superintendent or~~ Shift ~~(SOS)~~ shall be responsible for the control room command function. During any absence of the ~~SOS~~ from the control room while either unit is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the ~~SOS~~ from the control room while both units are in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

shift superintendent

DISCUSSION OF CHANGES
ITS: SECTION 5.1 - RESPONSIBILITY

ADMINISTRATIVE

A.1 Due to relocation of the Radiological Environmental Monitoring Program from the TS, reference to Specification 6.19 is deleted. A description of the changes to CTS 6.19 is contained in the discussion of changes for that TS.

A.2 The term "above-mentioned individuals' [illegible]nged to reference the TS (ITS 5.1.1 through 5.1.3) where these indiv[illegible] are named.

A.3 The current plant specific titles are changed to generic titles. ITS Section 5.2.1.a is revised to include a requirement for the plant specific titles of those personnel fulfilling the responsibilities to be included in the FSAR. The specific titles do not alter the responsibilities delineated in the Technical Specifications. Therefore, this is considered an administrative change only.

TECHNICAL CHANGES - MORE RESTRICTIVE

M.1 Proposed ITS 5.1.5 adds requirements to define the control room command function. These requirements are in addition to those in the present TS, and thus, represent a more restrictive change.

Specification 5.2

See Discussion of Changes for ITS: 5.1, Responsibility, in this Section.

6.1 RESPONSIBILITY

6.1.0 The General Manager-Nuclear Plant shall provide direct executive oversight over all aspects of Plant Hatch.

6.1.1 The Assistant General Manager-Plant Operations (AGM-PO) shall be responsible for overall unit operation, except for the Radiological Environmental Monitoring Program as described below and for delegation in writing of the succession of this responsibility during his absence. Certain plant support functions shall be the responsibility of the Assistant General Manager-Plant Support (AGM-PS).

6.1.2 The General Manager-Nuclear Plant or his designee shall be responsible for the Radiological Environmental Monitoring Program as described in Specification 6.19 and for the writing of the Annual Radiological Environmental Surveillance Report.

6.1.3 Each of the above-mentioned individuals is responsible for the accuracy of the procedures needed to implement his responsibilities.

5.2 6.2 ORGANIZATION

5.2.1 6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

5.2.1.a a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Plant Hatch Unit 2 updated FSAR.

Including plant specific titles of those personnel fulfilling the responsibilities of the positions delineated in the Technical Specification.

A.3

F

5.2.1.b b. An assistant plant manager ~~The AGM-PO~~ shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

5.2.1.c c. The Vice President-Nuclear shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining and providing technical support to the plant to ensure nuclear safety.

48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.

5.2.2.e

(3) A break of at least 8 hours should be allowed between work periods, including shift turnover time.

(4) Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by ~~the ACM-PO, the ACM-PS,~~ or higher level of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by ~~the ACM-PO, the ACM-PS,~~ or designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

an assistant plant manager

A.3

F

5.2.2.f h. The ~~Manager of Operations, all~~ Operations Superintendents, and all Shift Supervisors ~~shall~~ hold a senior reactor operator license. The plant operators ~~shall~~ hold a reactor operator license.

E

LA.4

INSERT 2 FOR ITS 5.2

5.2.2.g The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Supervisor (SS) in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

HA

DISCUSSION OF CHANGES
ITS: SECTION 5.2 - ORGANIZATION

ADMINISTRATIVE

A.1 The definitions of the various Operational Conditions are located in current Specification 1.0, Definitions, and in the proposed Technical Specifications in ITS 1.1, "Definitions." Therefore, this table notation is unnecessary and has been deleted.

A.2 The current Technical Specification provides examples of the Unit staff positions who perform safety-related functions and whose working hours are limited. Since these examples may not include all positions that could be limited and since these positions may change, the examples have been generalized. The modification of these examples clarifies present requirements and thus is an administrative change.

A.3 The current plant specific titles are changed to generic titles. ITS Section 5.2.1.a is revised to include a requirement for the plant specific titles of those personnel fulfilling the responsibilities to be included in the FSAR. The specific titles do not alter the responsibilities delineated in the Technical Specifications. Therefore, this is considered an administrative change only.

6.16 POST-ACCIDENT SAMPLING AND ANALYSIS

A program shall be established, implemented, and maintained to ensure the capability to obtain and analyze samples of reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere under accident conditions.

The program shall include the following:

(1) Training of personnel,

(2) Procedures for sampling and analysis, and

(3) Provisions for maintenance of sampling and analysis equipment.

See Discussion of Changes for ITS: 5.5.3, in this Section.

5.5.1

6.17 OFFSITE DOSE CALCULATION MANUAL

INSERT CTS DEFINITION ODCM

6.17.1 Licensee-initiated changes to the ODCM shall:

A.1

a. Be documented and records of reviews performed shall be retained as required by Technical Specification 6.10.2.o. 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.

onsite review committee

A.4

b. Become effective after review and acceptance by the ~~PRB~~ and the approval of the ~~General Manager Nuclear Plant~~. plant manager

A

c. Be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of, or concurrent with, the Annual 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.

6.18 RADIOACTIVE EFFLUENTS CONTROL PROGRAM

A program shall be established, implemented, and maintained conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

See Discussion of Changes for ITS: 5.5.4, in this Section.

1) Limitations on the OPERABILITY of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,

2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2,

3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM,

DISCUSSION OF CHANGES
ITS: SECTION 5.5.1 - OFFSITE DOSE CALCULATION MANUAL

ADMINISTRATIVE

A.1 The current TS contains a cross-reference to Specification 6.10.2.o for record retention. This cross-reference is not included in the proposed TS. The removal of this cross-reference is a presentation preference and thus, is considered an administrative change.

A.2 CTS numbers are changed by the new format of the proposed TS for Section 5.0. These new TS numbers are indicated in the TS markup.

A.3 The Radiological Environmental Monitoring Program is relocated from the TS as described in the CTS 6.19 Discussion of Changes. Therefore, the deletion of the reference to this removed TS is considered administrative.

A.4 The current plant specific titles are changed to generic titles. ITS Section 5.2.1.a is revised to include a requirement for the plant specific titles of those personnel fulfilling the responsibilities to be included in the FSAR. The specific titles do not alter the responsibilities delineated in the Technical Specifications. Therefore, this is considered an administrative change only.

UNIT 1 NO SIGNIFICANT HAZARDS DETERMINATION

NO SIGNIFICANT HAZARDS DETERMINATION
ITS: SECTION 3.8.1 - AC SOURCES—OPERATING

L.5 CHANGE

In accordance with the criteria set forth in 10 CFR 50.92, Georgia Power Company has evaluated this proposed Technical Specifications change and determined it does not involve a significant hazards consideration based on the following:

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

   The diesel generators (DGs) are used to support mitigation of the consequences of an accident; however, they are not considered the initiator of any previously analyzed accident. As such, the elimination of a specific signal requirement to perform the "hot restart" surveillance testing will not increase the probability of any accident previously evaluated. The proposed SR continues to provide adequate assurance of OPERABLE DGs since restart capability is not affected by the start signal or loading capability. Therefore, the proposed change does not involve an increase in the consequences of any accident previously evaluated.

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

   The proposed change does not introduce a new mode of plant operation and does not involve physical modification to the plant. Therefore, it does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

   This change does not involve a significant reduction in a margin of safety since the start capability of the DGs is not affected by the start signal or loading capability. Therefore, the proposed change provides an equivalent assurance of the capability of the DGs to perform their safety function.

This change was approved by the NRC and issued as Amendment 192 in a Safety Evaluation Report dated February 24, 1994.

UNIT 2 IMPROVED TECHNICAL SPECIFICATIONS

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 With the reactor steam dome pressure < 785 psig or core flow < 10% rated core flow:

THERMAL POWER shall be ≤ 25% RTP.

2.1.1.2 With the reactor steam dome pressure ≥ 785 psig and core flow ≥ 10% rated core flow:

MCPR shall be ≥ 1.06 for two recirculation loop operation or ≥ 1.07 for single recirculation loop operation.

2.1.1.3 Reactor vessel water level shall be greater than the top of active irradiated fuel.

2.1.2 Reactor Coolant System (RCS) Pressure SL

Reactor steam dome pressure shall be ≤ 1325 psig.

2.2 SL Violations

With any SL violation, the following actions shall be completed:

2.2.1 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.2 Within 2 hours:

2.2.2.1 Restore compliance with all SLs; and

2.2.2.2 Insert all insertable control rods.

2.2.3 Within 24 hours, notify the plant manager, the corporate executive responsible for overall plant nuclear safety, and the offsite review committee.

(continued)

2.0 SLs

2.2 SL Violations (continued)

2.2.4 Within 30 days, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC, the offsite review committee, the plant manager, and the corporate executive responsible for overall plant nuclear safety.

2.2.5 Operation of the unit shall not be resumed until authorized by the NRC.

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.5 and LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, an associated ACTION is not provided, or if directed by the associated ACTIONS, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

a. MODE 2 within 7 hours;

b. MODE 3 within 13 hours; and

c. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is only applicable in MODES 1, 2, and 3.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required

(continued)

3.0 LCO APPLICABILITY

LCO 3.0.4 (continued)

to comply with ACTIONS or that are part of a shutdown of the unit.

Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.

LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the required testing.

LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification 5.5.10, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

(continued)

3.0 SR APPLICABILITY (continued)

SR 3.0.4 Entry into a MODE or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The plant manager shall provide direct executive oversight over all aspects of Plant Hatch.

5.1.2 An assistant plant manager shall be responsible for overall unit operation, except for the Radiological Environmental Monitoring Program as described below and for delegation in writing of the succession of this responsibility during his absence. Certain plant support functions shall also be the responsibility of an assistant plant manager.

5.1.3 The plant manager or his designee shall be responsible for the Radiological Environmental Monitoring Program and for the writing of the Annual Radiological Environmental Operating Report.

5.1.4 Each of the individuals in Specification 5.1.1 through Specification 5.1.3 is responsible for the accuracy of the procedures needed to implement his responsibilities.

5.1.5 The shift superintendent shall be responsible for the control room command function. During any absence of the shift superintendent from the control room while either unit is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the shift superintendent from the control room while both units are in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements, including plant specific titles of those personnel fulfilling the responsibilities of the positions delineated in the Technical Specifications, shall be documented in the Plant Hatch Unit 2 FSAR;

b. An assistant plant manager shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;

c. The corporate executive responsible for Plant Hatch shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and

d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall include the following:

a. A total of three plant equipment operators (PEOs) for the two units is required in all conditions. At least one of

(continued)

5.2 Organization

5.2.2 Unit Staff

a. (continued)

the required PEOs shall be assigned to each reactor containing fuel.

b. At least one licensed Reactor Operator (RO) shall be present in the control room for each unit that contains fuel in the reactor. In addition, while the unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

c. The minimum shift crew composition shall be in accordance with 10 CFR 50.54(m)(2)(i). Shift crew composition may be less than the minimum requirement of 10 CFR 50.54(m)(2)(i) and 5.2.2.a for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements.

d. An individual qualified to implement radiation protection procedures shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed and non-licensed operations personnel, health physics technicians, key maintenance personnel, etc.). A

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a nominal 40 hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

e. (continued)

2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by an assistant plant manager or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by an assistant plant manager or designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

f. The operations manager shall hold an active or inactive SRO license.

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the shift supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

5.0 ADMINISTRATIVE CONTROLS

5.5 Programs and Manuals

The following programs and manuals shall be established, implemented, and maintained.

5.5.1 Offsite Dose Calculation Manual (ODCM)

a. The 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 and trip setpoints, and in the conduct of the radiological environmental monitoring program; and

b. The ODCM shall also contain the radioactive effluent controls and radiological environmental monitoring activities, and descriptions of the information that should be included in the Annual Radiological Environmental Operating and Radioactive Effluent Release reports required by Specification 5.6.2 and Specification 5.6.3, respectively.

Licensee initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:

1. sufficient information to support the change(s) and appropriate analyses or evaluations justifying the change(s), and

2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and does not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.

b. Shall become effective after review and acceptance by the onsite review committee and the approval of the plant manager; and

(continued)

5.5 Programs and Manuals

5.5.1 Offsite Dose Calculation Manual (ODCM) (continued)

c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in 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 (i.e., month and year) the change was implemented.

5.5.2 Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include the Core Spray, High Pressure Coolant, Injection, Residual Heat Removal, Reactor Core Isolation Cooling and Reactor Water Cleanup. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

b. System leak test requirements for each system, to the extent permitted by system design and radiological conditions, at refueling cycle intervals or less.

5.5.3 Post Accident Sampling

This program provides controls that ensure the capability to obtain and analyze reactor coolant; radioactive gases and particulates in plant gaseous effluents; and containment atmosphere samples under accident conditions. The program shall include the following:

a. Training of personnel;

b. Procedures for sampling and analysis; and

c. Provisions for maintenance of sampling and analysis equipment.

(continued)

UNIT 2 IMPROVED BASES

BASES

LCO 3.0.3 (continued)

assemblies in the spent fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.8 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.8 of "Suspend movement of irradiated fuel assemblies in the spent fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a MODE or other specified condition stated in that Applicability (e.g., Applicability desired to be entered) when the following exist:

a. Unit conditions are such that the requirements of the LCO would not be met in the Applicability desired to be entered; and

b. Continued noncompliance with the LCO requirements, if the Applicability were entered, would result in the unit being required to exit the Applicability desired to be entered to comply with the Required Actions.

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability

(continued)

BASES

LCO 3.0.4 (continued)

that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

Exceptions to LCO 3.0.4 are stated in the individual Specifications. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Specification.

LCO 3.0.4 is only applicable when entering MODE 3 from MODE 4, MODE 2 from MODE 3 or 4, or MODE 1 from MODE 2. Furthermore, LCO 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, or 3. The requirements of LCO 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, changing MODES or other specified conditions while in an ACTIONS Condition, either in compliance with LCO 3.0.4 or where an exception to LCO 3.0.4 is stated, is not a violation of SR 3.0.1 or SR 3.0.4 for those Surveillances that do not have to be performed due to the associated inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

LCO 3.0.5

LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of Srs to demonstrate:

a. The OPERABILITY of the equipment being returned to service; or

b. The OPERABILITY of other equipment.

(continued)

BASES

LCO 3.0.5 (continued)

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed SRs. This Specification does not provide time to perform any other preventive or corrective maintenance.

(continued)

BASES

SR 3.0.3 (continued)

period of up to 24 hours or up to the limit of the specified Frequency, whichever is less, applies from the point in time that it is discovered that the Surveillance has not been performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.

SR 3.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the

(continued)

BASES

SR 3.0.3 (continued)

Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability. This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit.

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency, on equipment that is inoperable, does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or

(continued)

BASES

SR 3.0.4 (continued)

other specified conditions in the Applicability that result from any unit shutdown.

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the

(continued)

BASES

SR 3.0.4 (continued)

Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability would have its frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

SR 3.0.4 is only applicable when entering MODE 3 from MODE 4, MODE 2 from MODE 3 or 4, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, or 3. The requirements of SR 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

UNIT 2 MARKUP OF CURRENT TECHNICAL SPECIFICATIONS AND DISCUSSION OF CHANGES

(See Discussion of Changes for Section 5.0, "Administrative Controls")

k. The Radiological Environmental Monitoring Program and the results thereof annually.

l. The ODCM, Process Control Program, and implementing procedures at least once per 24 months.

AUTHORITY

6.5.2.9 The SRB shall report to and advise the Vice President-Nuclear on those areas of responsibility specified in sections 6.5.2.7 and 6.5.2.8.

RECORDS

6.5.2.10 Records of SRB activities shall be prepared, approved and distributed as indicated below:

a. Minutes of each SRB meeting shall be prepared, approved and forwarded to the Vice President-Nuclear within 14 days following each meeting.

b. Reports of reviews encompassed by section 6.5.2.7 above, shall be prepared, approved and forwarded to the Vice President-Nuclear within 14 days following completion of the review.

c. Audit reports encompassed by section 6.5.2.8 above, shall be forwarded to the Vice President-Nuclear and to the management positions responsible for the areas audited within 30 days after completion of the audit.

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified and/or a report submitted pursuant to the requirements of section 50.73 to 10 CFR part 50, and

b. Each REPORTABLE EVENT shall be reviewed by the PRB, and the results of this review shall be submitted to the SRB, the General Manager-Nuclear Plant, and the Vice President-Nuclear.

6.7 SAFETY LIMIT VIOLATION

2.2 6.7.1 The following actions shall be taken in the event a Safety Limit is violated:

2.2.2 a. The unit shall be placed in at least HOT SHUTDOWN within 2 hours.

b. 2.2.1 The Safety Limit violation shall be reported to the Commission as soon as practical and in all cases within 1 hour of occurrence.

2.2.3 The ~~General Manager-Nuclear Plant, and Vice President-Nuclear, and the SRB~~ shall be notified within 24 hours.

A.3

F

plant manager, and corporate executive responsible for overall plant nuclear safety, and the offsite review committee

SAFETY LIMIT VIOLATION (Continued)

2.2.4 c. A Licensee Event Report shall be prepared pursuant to 10 CFR 50.73.

d. The Licensee Event Report shall be submitted to the Commission in accordance with 10 CFR 50.73, and to ~~the PRB~~, the ~~SAR~~, the ~~General Manager-Nuclear Plant~~, and the ~~Vice President Nuclear~~ within 30 days of the violation.

(A.2) proposed specification 2.2.5 → 2.2.4

plant manager

corporate executive responsible for overall plant nuclear safety

offsite review committee

A.3

F

6.8 PROCEDURES

See Discussion of Changes for Section 5.0 "Administrative Controls"

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

a. The applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978.

b. Refueling operations.

c. Surveillance and test activities of safety related equipment.

d. Security Plan implementation.

e. Emergency Plan implementation.

f. Fire Protection Program implementation.

g. PROCESS CONTROL PROGRAM implementation.

h. ODCM implementation.

6.8.2 Each procedure of 6.8.1 and other procedures which the General Manager-Nuclear Plant, the AGM-PO, or the AGM-PS has determined to affect nuclear safety, and changes thereto, shall be reviewed by the PRB and approved by the appropriate member of plant management, designated by the General Manager-Nuclear Plant, the AGM-PO, or the AGM-PS prior to implementation. The General Manager-Nuclear Plant, the AGM,-PO, or the AGM-PS will approve administrative procedures, security plan implementing procedures, and changes thereto. The Manager-Plant Training and Emergency Preparedness shall approve the emergency plan implementing procedures and changes thereto. All other procedures of this specification and changes thereto will be approved by the department head designated by the General Manager-Nuclear Plant, the AGM-PO, or the AGM-PS. The procedures of this specification shall be reviewed periodically as set forth in administrative procedures.

6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:

a. The intent of the original procedure is not altered.

DISCUSSION OF CHANGES
ITS: SECTION 2.0 - SAFETY LIMITS

ADMINISTRATIVE

A.1 The technical content of this requirement is being moved to Section 3.3 of the proposed Technical Specifications in accordance with the format of the BWR Standard Technical Specifications, NUREG 1433. Any technical changes to this requirement will be addressed with the content of the proposed chapter location.

A.2 A current requirement of 10 CFR 50.36 stating that if a Safety Limit is violated, critical "Operation of the unit will not be resumed until authorized by the NRC," has been added (proposed 2.2.5). Since it is a regulation, the addition of this to the Technical Specifications is considered administrative in nature.

A.3 The current plant specific titles are changed to generic titles. ITS Section 5.2.1.a is revised to include a requirement for the plant specific titles of those personnel fulfilling the responsibilities to be included in the FSAR. The specific titles do not alter the responsibilities delineated in the Technical Specifications. Therefore, this is considered an administrative change only.

TECHNICAL CHANGE - MORE RESTRICTIVE

M.1 The APPLICABILITY of each of the SLs is extended to all MODES of operation. Although it is physically impossible to violate some SLs in some MODES, any SL violation should receive the same attention and response.

M.2 Limits on steam dome pressure and core flow are now specified as greater than or equal to. The current Safety Limits do not address the situation when steam dome pressure and core flow are equal to the limits. This change resolved a discontinuity between SL 2.1.1 and SL 2.1.2 in the current Safety Limits.

TECHNICAL CHANGE - LESS RESTRICTIVE

"Generic"

LA.1 The required action has been made less specific to allow operator flexibility in determining the best method to restore the water level. Directions for the methods are included in the appropriate Emergency Operating Procedures. The time frame for completion of the action is consistent with the allowed time to restore other Safety Limit violations.

"Specific"

L.1 The review of the LER by the Plant Review Board is duplicative of the review performed by the Safety Review Board. Deleting this review responsibility from the onsite review group provides additional review time for the remaining functions. Since this review is after submittal,

ADMINISTRATIVE
(continued)

the offsite review function provides sufficient, adequate, and timely review.

LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

Insert 3.0D

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.

Insert 3.0E

LCO 3.0.5 Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY, the OPERABILITY of other equipment, ~~or variables~~ to be within limits. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the required testing.

Insert 4.0C

SR 3.0.3 (L.5)

If it is discovered that a Surveillance was not performed within its specified Frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified Frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance.

If the Surveillance is not performed within the delay period, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered.

Insert 4.0D

SR 3.0.4

(A.9) Entry into a MODE or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. This provision

(A.12) shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with ACTIONS, or that are part of a shutdown of the unit.

(L.2) SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3. (F)

ADMINISTRATIVE
(continued)

A.5 Editorial rewording is consistent with the BWR Standard Technical Specifications, NUREG 1433 or generic changes to the NUREG. During its development, certain wording preferences or English language conventions were adopted which resulted in no technical changes (either actual or interpretational) to the Technical Specifications.

- The phrase "Entry into an OPERATIONAL CONDITION or other specified applicability state" has been changed to "When an LCO is not met, entry into a MODE or other specified condition in the Applicability..." This new wording is consistent with the terminology of the BWR Standard Technical Specifications, NUREG 1433.

- The phrase "unless otherwise excepted" has been reworded to be "Exceptions to this Specification are stated in the individual Specifications." This more clearly states the intent of the original statement. The following proposed sentence is added to clarify the intent of the individual exceptions to LCO 3.0.4: "These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time."

A.6 Current LCO 3.0.5 has been moved to LCO 3.8.1, "AC Sources - Operating," as Required Actions A.2, B.2, and C.1. A time limit on performing the operability determination is also provided in the Completion Time for the Required Actions. For the Discussion of Changes, see LCO 3.8.1, "AC Sources - Operating."

A.7 LCO 3.0.6 is added to provide guidance regarding the appropriate actions to be taken when a single inoperability (e.g., a support system) also results in the inoperability of one or more related systems (e.g., supported system(s)). The existing Technical Specifications, and various NRC guidance documents do not have a consistent provided approach to the combined support/supported inoperability.

- Guidance provided in the June 13, 1979, NRC memorandum from Brian K. Grimes (Assistant Director for Engineering and Projects) to Samuel E. Bryan (Assistant Director for Field Coordination) indicates an intent/interpretation consistent with the proposed LCO 3.0.6 --

ADMINISTRATIVE
(continued)

A.12 The statement "This provision shall not prevent entry into MODES or other specified conditions in the Applicability that are required to comply with the ACTIONS or that are part of a shutdown of the unit" is added following the intent of NRC Generic Letter 87-09 to clarify that the provisions of proposed SR 3.0.4 do not prevent passage to or through lower MODES or other specified conditions to comply with ACTIONS.

A.13 The technical content of this requirement is being moved to Specification 5.5.6. Any technical changes to this requirement will be addressed in the Discussion of Changes for the new Specifications.

A.14 The Bases are completely revised in accordance with the applicable Bases from NUREG 1433. The individual changes that are necessary are made to support the corresponding changes to the Technical Specifications, and the justifications for each are the same as the justifications for the associated change to the Technical Specification.

TECHNICAL CHANGE - MORE RESTRICTIVE

M.1 The sentence "For Frequencies specified as 'once,' the above interval extension does not apply" is proposed to be added. This is because the interval extension concept is based on scheduling flexibility for repetitive performances, and these Surveillances are not repetitive in nature and essentially have no interval as measured from the previous performance. This precludes the ability to extend these performances, and is, therefore, an additional restriction. The existing Specification can be seen to allow the extension to apply to all Surveillances.

TECHNICAL CHANGE - LESS RESTRICTIVE

L.1 The time to reach MODE 3 (Hot Shutdown) has been extended from 6 hours to 13 hours, and the time to reach MODE 4 (Cold Shutdown) has been extended from 36 hours (6 to reach MODE 3 and 30 to reach MODE 4) to 37 hours. In addition, a requirement to be in MODE 2 within 7 hours has been added. The 1 hour extension is added to provide adequate time to plan the impending shutdown. The 6 hour extension in reaching MODE 3 is added to provide the necessary time to shut down the plant from full power conditions in a controlled and orderly manner that is within the capabilities of the unit assuming the minimum required equipment is OPERABLE. This extra time reduces the potential for unit upset that could challenge safety systems. This time is consistent with other similar actions throughout the current Hatch Unit 2 Technical Specifications. To offset this additional time, the unit must be placed in MODE 2 within 7 hours. This will place the unit in a condition where the probability of occurrence and the consequences of most accidents and transients are less than if the unit were still in MODE 1. The proposed actions and times are consistent with those currently approved the BWR Standard Technical Specifications, NUREG 1433.

TECHNICAL CHANGE - LESS RESTRICTIVE
(continued)

L.2 The phrase "...unless the conditions for the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION statements..." was changed to "... except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time." This change removes an unduly restrictive requirement. For an LCO which has ACTIONS permitting continued operation for an unlimited period of time, entry into a MODE or other specified condition should be permitted in accordance with these ACTIONS. This is consistent with the NRC's regulatory requirements for an LCO. The restriction on a change in a MODE or other specified condition should apply only where the ACTIONS establish a specified time interval in which the LCO must be met or a shutdown is required. This phrase was changed to be consistent with Generic Letter 87-09 except that the Generic Letter version of Specification 3.0.4 phrase "...and the associated ACTION requires a shutdown if they are not met within a specified time interval" was changed to "...permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time." This statement is consistent with Generic Letter 87-09, Specification 3.0.4 guidance regarding the changing of MODES while relying upon the ACTION requirements when they permit continued operation for an unlimited period of time. This change also provides consistency for use of proposed LCO 3.0.4, since it is the permitting of continued operation for an unlimited period of time, not the requirement to shut down, that determines the applicability of proposed LCO 3.0.4.

In addition, the phrase "or that are part of a shutdown of the unit" was added to the end and the first paragraph and the sentence "LCO [SR] 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3" was added. These changes provide clarity for the actual application of the LCO 3.0.4 and SR 3.0.4 restrictions. Reviews of NUREG 1433 and the Hatch ITS with respect to this change concluded that the potential restrictions eliminated with this portion of the change are either: 1) consistent with the allowance discussed above when ACTIONS allow continued operation in the Applicability, 2) consistent with the existing LCO/SR 3.0.4 allowance for entering Applicabilities that would be applicable as a result of complying with shutdown ACTIONS, or 3) precluded by compliance with the applicable ACTIONS.

L.3 LCO 3.0.5 is added to provide an exception to LCO 3.0.2 for instances where restoration of inoperable equipment to an OPERABLE status could not be performed while continuing to comply with Required Actions. Many Technical Specifications actions require an inoperable component to be removed from service, such as: maintaining an isolation valve closed, disarming a control rod, or tripping an inoperable instrument channel. An exception to these Required Actions is necessary to allow the performance of Surveillance Requirements to either demonstrate the OPERABILITY of the equipment being returned to service, or to demonstrate the OPERABILITY or other equipment which otherwise could not be performed without returning

TECHNICAL CHANGE - LESS RESTRICTIVE
(continued)

LCO 3.0.5 is necessary to establish an allowance that, although informally utilized in restoration of inoperable equipment, is not formally recognized in the present Technical Specifications. Without this allowance, certain components could not be restored to OPERABLE status and a plant shutdown would ensue. Clearly, it is not the intent or desire that the Technical Specifications preclude the return to service of a suspected OPERABLE component to confirm its OPERABILITY. This allowance is deemed to represent a more stable, safe operation than requiring a plant shutdown to complete the restoration and confirmatory testing.

ADMINISTRATIVE

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(continued)

In addition, since the swing DG is common to both units, SRs that allow one performance to satisfy both units' requirements are allowed to be performed while one unit is not shutdown, provided the SR is being performed from the other unit. Since this is only a change in presentation of current practice, this change is considered administrative.

A.6 These two possible values for the overspeed trip point are fixed by the design of the DG unit. The appropriate value (i.e., the most limiting, which is 65.5 Hz) is presented in the proposed Technical Specifications. This presentation eliminates the basis for the accepted value from the Technical Specifications, moving it to the Bases. Since there is no difference in the requirement, this is an editorial presentation preference only.

A.7 Proposed Note 1 to SRs 3.8.1.9, 3.8.1.10, and 3.8.1.17 and Note 2 to SR 3.8.1.13 have been added. This allows an engine prelube prior to DG start. The current Specifications do not prohibit this allowance and the addition is provided for clarity. As such, it is considered administrative in nature.

A.8 The technical content of this requirement is being moved to Chapter 5.0 of the proposed Technical Specifications in accordance with the format of the BWR Standard Technical Specifications, NUREG 1433. Any technical changes to this requirement will be addressed with the content of proposed Specification 5.6.2.

A.9 The requirement to perform this Surveillance after the 24 hour run has been deleted. As indicated by the *** footnote, it is acceptable to perform the test after a $\geq$ 2 hour run at $\geq$ 2565 kW. Therefore, since it is already allowed to be performed in this manner, this change is considered administrative. This specific clarificatior was explicitly added to the Unit 2 CTS by Amendment 131, dated February 24, 1994.

A.10 The technical content of current Specifications 4.8.1.1.2.a.2, 4.8.1.1.2.a.3, 4.8.1.1.2.a.6, 4.8.1.1.2.c, and 4.8.1.1.2.d.13 is being moved to LCO 3.8.3. The technical content of Specifications 4.8.1.1.3.a.4, 4.8.1.1.3.c, and 4.8.1.1.3.d is being moved to LCO 3.8.4 and LCO 3.8.5. The technical content of Specifications 4.8.1.1.3.a.1,2,3, and 4.8.1.1.3.b is being moved to LCO 3.8.6. This is in accordance with the format of the BWR Standard Technical Specifications, NUREG 1433. Any technical changes to these requirements are addressed with the content of the proposed LCOs.

TECHNICAL CHANGE - LESS RESTRICTIVE
(continued)

L.9 The limitation on the time to reach full DG load from a manual synchronization is proposed for deletion. DG loading should be done in accordance with manufacturer's recommendations to minimize wear on the engine. Additionally, placing a time limitation on the operator to accomplish this loading results in an increased potential for error and subsequent unavailability of the DG. The starting, loading, subsequent full load operation, and automatic start and loading testing required by other Technical Specification Surveillances is adequate to confirm the DG's capability without the 120-second loading requirement. In addition, for clarity, Note 2 has been added to this SR to specifically allow gradual loading.

L.10 The proposed "hot restart" test (proposed SR 3.8.1.13) does not require the restart be a simulated loss of offsite power (auto-start signal). The "hot restart" is proposed to simply be any start signal, as is required by the monthly test. Furthermore, the specific requirement to be automatically loaded with emergency loads is excessive; the DG has demonstrated its ability to power loads while "hot" (i.e., the 24 hour run). Additionally, the automatic loading is an unnecessary repetition of other SRs which confirm the DG ability to accept sequenced loads. DG loading following the hot restart is proposed to be controlled by plant procedures and appropriate manufacturer recommendations for loading following any DG start. This revision allows greater flexibility in scheduling DG testing while not compromising any necessary demonstration of DG capability. This change was approved as Amendment 131, dated February 24, 1994 (note this Amendment renumbered this test as 4.8.1.1.2.d.14).

L.11 Deleted.

L.12 The current Specification 3.0.5 has been moved to LCO 3.8.1, in the form of Required Actions A.2, B.2, C.2, and D.1. These new Required Actions are essentially the same as the current 3.0.5, except for the newly provided Completion Times to perform the checks required by current 3.0.5, item (2), and proposed Required Actions A.2, B.2, C.2 and D.1. This new

Specification 5.1

6.0 ADMINISTRATIVE CONTROLS

5.1 6.1 RESPONSIBILITY

A.3

5.1.1 6.1.0 The General Manager-Nuclear Plant shall provide direct executive oversight over all aspects of Plant Hatch.

A.3

5.1.2 6.1.1 The Assistant General Manager-Plant Operations (AGM-PO) shall be responsible for overall unit operation, except for the Radiological Environmental Monitoring Program as described below and for delegation in writing of the succession of this responsibility during his absence. Certain plant support functions shall be the responsibility of the Assistant General Manager-Plant Support (AGM-PS).

A.3

5.1.3 6.1.2 The General Manager-Nuclear Plant or his designee shall be responsible for the Radiological Environmental Monitoring Program as described in Specification 6.19 and for the writing of the Annual Radiological Environmental Surveillance Report.

A.1

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5.1.4 6.1.3 Each of the above-mentioned individuals is responsible for the accuracy of the procedures needed to implement his responsibilities.

5.1.5 6.2 ORGANIZATION

INSERT 1

M.1

See Discussion of Changes for ITS: 5.2, Organization, in this section.

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Plant Hatch Unit 2 updated FSAR.

b. The AGM-PO shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

c. The Vice President-Nuclear shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining and providing technical support to the plant to ensure nuclear safety.

INSERT 1 for ITS 5.1

The ~~S~~uperintendent ~~of~~ ~~S~~hift ~~(SM)~~ shall be responsible for the control room command function. During any absence of the ~~SM~~ from the control room while either unit is in MODE 1, 2, or 3, an individual with an active Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the ~~SM~~ from the control room while both units are in MODE 4 or 5, an individual with an active SRO license or Reactor Operator license shall be designated to assume the control room command function.

shift superintendent

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DISCUSSION OF CHANGES
ITS: SECTION 5.1 - RESPONSIBILITY

ADMINISTRATIVE

A.1 Due to relocation of the Radiological Environmental Monitoring Program from the TS, reference to Specification 6.19 is deleted. A description of the changes to CTS 6.19 is contained in the Discussion of Changes for that TS.

A.2 The term "above-mentioned individuals" is changed to reference the TS (ITS 5.1.1 through 5.1.3) where these individuals are named.

A.3 The current plant specific titles are changed to generic titles, and ITS Section 5.2.1.a is revised to include a requirement for the plant specific titles of those personnel fulfilling the responsibilities to be included in the FSAR. The specific titles do not alter the responsibilities delineated in the Technical Specifications. Therefore, this is considered an administrative change only.

TECHNICAL CHANGES - MORE RESTRICTIVE

M.1 Proposed ITS 5.1.5 adds requirements to define the control room command function. These requirements are in addition to those in the present TS, and thus, represent a more restrictive change.

See Discussion of Changes for ITS 5.1, Responsibility, in this Section.

Specification 5.2

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.0 The General Manager-Nuclear Plant shall provide direct executive oversight over all aspects of Plant Hatch.

6.1.1 The Assistant General Manager-Plant Operations (AGM-PO) shall be responsible for overall unit operation, except for the Radiological Environmental Monitoring Program as described below and for delegation in writing of the succession of this responsibility during his absence. Certain plant support functions shall be the responsibility of the Assistant General Manager-Plant Support (AGM-PS).

6.1.2 The General Manager-Nuclear Plant or his designee shall be responsible for the Radiological Environmental Monitoring Program as described in Specification 6.19 and for the writing of the Annual Radiological Environmental Surveillance Report.

6.1.3 Each of the above-mentioned individuals is responsible for the accuracy of the procedures needed to implement his responsibilities.

5.2 ### 6.2 ORGANIZATION

5.2.1 #### 6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

5.2.1.a a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the Plant Hatch Unit 2 updated FSAR.

A.2

An assistant plant manager

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, including plant specific titles of those personnel fulfilling the responsibilities of the positions delineated in the Technical Specifications

5.2.1.b b. ~~The AGM PO~~ shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.

5.2.1.c c. The ~~Vice President Nuclear shall have~~ corporate executive responsibility for ~~overall plant nuclear safety and~~ shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining and providing technical support to the plant to ensure nuclear safety.

Plant Hatch

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(2) An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.

(3) A break of at least 8 hours should be allowed between work periods, including shift turnover time.

(4) Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

A.2

an assistant plant manager

Any deviation from the above guidelines shall be authorized by ~~the ACM-RO, ACM-PS~~ or higher level of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by ~~the ACM-RO, ACM-PS,~~ or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

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5.2.2.5 h. The Manager of Operations, all Operations Superintendents, and all Shift Supervisors shall hold a senior reactor operator license. The plant operators shall hold a reactor operator license.

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INSERT 2 FOR ITS 5.2

5.2.2.g The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Supervisor (SS) in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit. In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

1 F

DISCUSSION OF CHANGES
ITS: SECTION 5.2 - ORGANIZATION

ADMINISTRATIVE

A.1 The current Technical Specification provides examples of the Unit staff positions who perform safety-related functions and whose working hours are limited. Since these examples may not include all positions that could be limited and since these positions may change, the examples have been generalized. The modification of these examples clarifies present requirements and thus is an administrative change.

A.2 The current plant specific titles are changed to generic titles, and ITS Section 5.2.1.a is revised to include a requirement for the plant specific titles of those personnel fulfilling the responsibilities to be included in the FSAR. The specific titles do not alter the responsibilities delineated in the Technical Specifications. Therefore, this is considered an administrative change only.

TECHNICAL CHANGES - MORE RESTRICTIVE

M.1 CTS 6.2.2.c requires that at least two licensed operators be present in the control room for each reactor in the process of startup, scheduled reactor shutdown, and during recovery from reactor trips. The ITS is more restrictive by requiring a Senior Reactor Operator to be present in the control room while the unit is in MODES 1, 2, or 3, in addition to at least one licensed Reactor Operator.

M.2 New requirements are being added in the ITS to specify the function of the Shift Technical Advisor (STA). The STA shall provide advisory technical support to the Shift Supervisor in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit.

TECHNICAL CHANGE - LESS RESTRICTIVE

"Generic"

LA.1 Details of the minimum shift crew requirements located in current Technical Specifications Table 6.2.2-1 are relocated to plant procedures. The minimum shift crew requirements for licensed operators and senior operators contained in 10 CFR 50.54 (k), (l), and (m) and do not need to be repeated in the ITS. The minimum shift crew requirements for non-licensed plant equipment operators transferred from present Table 6.2.2-1 to ITS 5.2.2.a. In addition, ITS 5.1.5 contains requirements for the control room command function, ITS 5.2.2.c contains minimum requirements for licensed Reactor Operators and Senior Operators to be present in the control room, and ITS 5.2.2.g contains STA requirements. The relocation of the details of the minimum shift crew requirements to plant procedures is acceptable considering the controls provided by regulations, the remaining requirements in the ITS, and plant procedure change control by the 10 CFR 50.59 process.

Specification 5.5.1

6.16 POST-ACCIDENT SAMPLING AND ANALYSIS

A program shall be established, implemented, and maintained to ensure the capability to obtain and analyze samples of reactor coolant, radioactive iodines and particulates in plant gaseous effluents, and containment atmosphere under accident conditions.

The program shall include the following:

(1) Training of personnel,

(2) Procedures for sampling and analysis, and

(3) Provisions for maintenance of sampling and analysis equipment.

See Discussion of Changes for ITS 5.5.3, in this Section.

5.5.1 6.17 OFFSITE DOSE CALCULATION MANUAL

INSERT CTS DEFINITION ODCM

6.17.1 Licensee-initiated changes to the ODCM shall:

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

A.1

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. Become effective after review and acceptance by the ~~PRB~~ onsite review committee and the approval of the ~~General Manager Nuclear Plant~~ plant manager.

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c. Be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of, or concurrent with, the Annual 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.

See Discussion of changes for ITS: 5.5.4, in this Section.

6.18 RADIOACTIVE EFFLUENTS CONTROL PROGRAM

A program shall be established, implemented, and maintained conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

1) Limitations on the OPERABILITY of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,

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DISCUSSION OF CHANGES
ITS: SECTION 5.5.1 - OFFSITE DOSE CALCULATION MANUAL

ADMINISTRATIVE

A.1 The current TS contains a cross-reference to Specification 6.10.2.o for record retention. This cross-reference is not included in the proposed TS. The removal of this cross-reference is a presentation preference and, thus, is considered an administrative change.

A.2 CTS numbers are changed by the new format of the proposed TS for Section 5.0. These new TS numbers are indicated in the TS markup.

A.3 The Radiological Environmental Monitoring Program is being relocated from the TS as discussed in the changes for CTS 6.19. Therefore, the deletion of the reference to this removed TS is considered administrative.

A.4 The current plant specific titles are changed to generic titles. ITS Section 5.2.1.a is revised to include a requirement for the plant specific titles of those personnel fulfilling the responsibilities to be included in the FSAR. The specific titles do not alter the responsibilities delineated in the Technical Specifications. Therefore, this is considered an administrative change only.

UNIT 2 NO SIGNIFICANT HAZARDS DETERMINATION

NO SIGNIFICANT HAZARDS DETERMINATION
ITS: SECTION 3.0 - LCO AND SR APPLICABILITY

L.2 CHANGE

In accordance with the criteria set forth in 10 CFR 50.92 Georgia Power Company has evaluated this proposed Technical Specifications change and determined it does not involve a significant hazards consideration based on the following:

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

   The change to Specification 3.0.4 will allow MODE or other specified condition changes while the plant is in the ACTIONS which do not prohibit continued operation for an unlimited time in the MODE or other specified condition in the Applicability. Since it has been previously determined that continued operation is acceptable for these affected LCOs, and making a MODE or other specified condition change to enter or move through the Applicability results in the same probability and consequences as initially being in the Applicability when the ACTIONS are entered due to an inoperable component, there is no significant increase in the probability or consequences of an accident previously evaluated. In addition, exception to Specification 3.0.4 has already been taken in many of the individual existing ACTION statements. Incorporating the proposed change into LCO 3.0.4 will ensure that exceptions will be consistently applied when justified. Deletion of the individual exceptions will have no impact upon the requirements in the Specifications since the exception to existing Specification 3.0.4 will now be contained within proposed LCO 3.0.4.

   The addition of the phrase "or that are part of a shutdown on the unit" and the sentence "LCO (SR) 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3" added to LCO 3.0.4 and SR 3.0.4, provides clarity for the actual application of the LCO 3.0.4 restrictions. It has been determined that the potential restriction eliminated with this portion of the change are either: 1) consistent with the allowance discussed above when ACTIONS allow continued operation in the Applicability, 2) consistent with the existing LCO 3.0.4 allowance for entering Applicabilities that would be applicable as a result of complying with shutdown ACTIONS, or 3) precluded by compliance with the applicable ACTIONS.

   Therefore this change will not result in a significant increase in the probability or consequences of an accident previously evaluated.

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

   The proposed change does not necessitate a physical alteration of the plant (no new or different type of equipment will be installed) or changes in parameters governing normal plant operation. Thus, this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

L.2 CHANGE
(continued)

3. Does this change involve a significant reduction in a margin of safety?

The change to Specification 3.0.4 will allow MODE or other specified condition changes while the plant is in the ACTIONS which do not prohibit continued operation for an unlimited period of time in the MODE or other specified condition in the Applicability. Since it has been previously determined that continued operation is acceptable for these affected LCOs and making a MODE or other specified condition change to enter or move through the Applicability results in the same consequences as initially being in the Applicability when the ACTIONS are entered due to an inoperable component, there is no significant reduction in the margin of safety. In addition, exceptions to Specification 3.0.4 are already contained within many of the applicable existing ACTION statements. Incorporating the exceptions within proposed LCO 3.0.4 will ensure their consistent application.

The addition of the phrase "or that are part of a shutdown on the unit" and the sentence "LCO (SR) 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3" added to LCO 3.0.4 and SR 3.0.4, provides clarity for the actual application of the LCO 3.0.4 restrictions. It has been determined that the potential restriction eliminated with this portion of the change are either: 1) consistent with the allowance discussed above when ACTIONS allow continued operation in the Applicability, 2) consistent with the existing LCO 3.0.4 allowance for entering Applicabilities that would be applicable as a result of complying with shutdown ACTIONS, or 3) precluded by compliance with the applicable ACTIONS.

Therefore this change will not result in a significant decrease in the margin of safety.

NO SIGNIFICANT HAZARDS DETERMINATION
ITS: SECTION 3.8.1 - AC SOURCES — OPERATING

L.10 CHANGE

In accordance with the criteria set forth in 10 CFR 50.92, Georgia Power Company has evaluated this proposed Technical Specifications change and determined it does not involve a significant hazards consideration based on the following:

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

   The diesel generators (DGs) are used to support mitigation of the consequences of an accident; however, they are not considered as the initiator of any previously analyzed accident. As such, the elimination of a specific signal requirement to perform the "hot restart" surveillance testing will not increase the probability of any accident previously evaluated. The proposed SR continues to provide adequate assurance of OPERABLE DGs since restart capability is not affected by the start signal. Therefore, the proposed change does not involve an increase in the consequences of any accident previously evaluated.

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

   The proposed change does not introduce a new mode of plant operation and does not involve physical modification to the plant. Therefore, it does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

   This change does not involve a significant reduction in a margin of safety since the start capability of the DGs is not affected by the start signal. Therefore, the proposed change provides an equivalent assurance of the capability of the DGs to perform their safety function.

This change was approved by the NRC, and issued as Amendment 131, in an Safety Evaluation Report dated February 24, 1994.

NUREG 1433 COMPARISON DOCUMENT - SPECIFICATIONS

2.0 SAFETY LIMITS (SLs)

2.1 SLs

2.1.1 Reactor Core SLs

2.1.1.1 With the reactor steam dome pressure < 785 psig or core flow < 10% rated core flow:

THERMAL POWER shall be ≤ 25% RTP.

2.1.1.2 With the reactor steam dome pressure ≥ 785 psig and core flow ≥ 10% rated core flow:

MCPR shall be ≥ ~~1.07~~ 1.07 for two loop recirculation operation or ≥ ~~1.08~~ 1.08 for single loop recirculation operation.

2.1.1.3 Reactor vessel water level shall be greater than the top of active irradiated fuel.

2.1.2 Reactor Coolant System Pressure SL

Reactor steam dome pressure shall be ~~maintained~~ ≤ 1325 psig.

2.2 SL Violations

With any SL violation, the following actions shall be completed:

2.2.1 Within 1 hour, notify the NRC Operations Center, in accordance with 10 CFR 50.72.

2.2.2 Within 2 hours:

2.2.2.1 Restore compliance with all SLs; and

2.2.2.2 Insert all insertable control rods.

2.2.3 Within 24 hours, notify the ~~[General Manager Nuclear Plant, and Vice President Nuclear, Operations]~~ and the ~~[offsite reviewers specified in Specification 5.5.2, "[Offsite] Review and Audit"]~~.

(continued)

2.0 SLs

2.2 SL Violations (continued)

also modified by DWOG-09, Item C.26

2.2.4 Within 30 days, a Licensee Event Report (LER) shall be prepared pursuant to 10 CFR 50.73. The LER shall be submitted to the NRC, the ~~[~~offsite reviewer~~ specified in Specification 5.5.2]~~, ~~and~~ the ~~[~~General Manager Nuclear Plant~~ Operations]~~, and ~~Vice President Nuclear~~.

P.3

plant

Committee

Corporate executive responsible for overall plant nuclear safety

HA

2.2.5 Operation of the unit shall not be resumed until authorized by the NRC.

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY

LCO 3.0.1 LCOs shall be met during the MODES or other specified conditions in the Applicability, except as provided in LCO 3.0.2 and LCO 3.0.7.

LCO 3.0.2 Upon discovery of a failure to meet an LCO, the Required Actions of the associated Conditions shall be met, except as provided in LCO 3.0.6.

If the LCO is met or is no longer applicable prior to expiration of the specified Completion Time(s), completion of the Required Action(s) is not required, unless otherwise stated.

LCO 3.0.3 When an LCO is not met and the associated ACTIONS are not met, or an associated ACTION is not provided, the unit shall be placed in a MODE or other specified condition in which the LCO is not applicable. Action shall be initiated within 1 hour to place the unit, as applicable, in:

a. MODE 2 within 7 hours;

b. MODE 3 within 13 hours; and

c. MODE 4 within 37 hours.

Exceptions to this Specification are stated in the individual Specifications.

Where corrective measures are completed that permit operation in accordance with the LCO or ACTIONS, completion of the actions required by LCO 3.0.3 is not required.

LCO 3.0.3 is applicable in MODES 1, 2, and 3.

LCO 3.0.4 When an LCO is not met, entry into a MODE or other specified condition in the Applicability shall not be made except when the associated ACTIONS to be entered permit continued operation in the MODE or other specified condition in the Applicability for an unlimited period of time. This

(continued)

3.0 LCO APPLICABILITY

LCO 3.0.4 (continued)

Specification shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS or that are part of a shutdown of the unit.

LCO 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

Exceptions to this Specification are stated in the individual Specifications. These exceptions allow entry into MODES or other specified conditions in the Applicability when the associated ACTIONS to be entered allow unit operation in the MODE or other specified condition in the Applicability only for a limited period of time.

LCO 3.0.5

Equipment removed from service or declared inoperable to comply with ACTIONS may be returned to service under administrative control solely to perform testing required to demonstrate its OPERABILITY or the OPERABILITY of other equipment. This is an exception to LCO 3.0.2 for the system returned to service under administrative control to perform the testing required to demonstrate OPERABILITY.

LCO 3.0.6

When a supported system LCO is not met solely due to a support system LCO not being met, the Conditions and Required Actions associated with this supported system are not required to be entered. Only the support system LCO ACTIONS are required to be entered. This is an exception to LCO 3.0.2 for the supported system. In this event, additional evaluations and limitations may be required in accordance with Specification ~~5.0~~ 5.5.12, "Safety Function Determination Program (SFDP)." If a loss of safety function is determined to exist by this program, the appropriate Conditions and Required Actions of the LCO in which the loss of safety function exists are required to be entered.

When a support system's Required Action directs a supported system to be declared inoperable or directs entry into Conditions and Required Actions for a supported system, the applicable Conditions and Required Actions shall be entered in accordance with LCO 3.0.2.

(continued)

3.0 SR APPLICABILITY

SR 3.0.3 (continued)

When the Surveillance is performed within the delay period and the Surveillance is not met, the LCO must immediately be declared not met, and the applicable Condition(s) must be entered. ~~The Completion Times of the Required Actions begin immediately upon failure to meet the Surveillance.~~

GA.2

SR 3.0.4

Entry into a MODE or other specified condition in the Applicability of an LCO shall not be made unless the LCO's Surveillances have been met within their specified Frequency. This provision shall not prevent ~~passage through or to~~ MODES or other specified conditions in ~~compliance~~ with ~~Required~~ Actions, or that are part of a shutdown of the unit.

entry to

GA.1

GP.4

GA.1

the Applicability that are required to comply

GP.4

F

SR 3.0.4 is only applicable for entry into a MODE or other specified condition in the Applicability in MODES 1, 2, and 3.

5.0 ADMINISTRATIVE CONTROLS

5.1 Responsibility

5.1.1 The [Plant Superintendent] shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

The [Plant Superintendent], or his designee, in accordance with approved administrative procedures, shall approve prior to implementation, each proposed test or experiment and proposed changes and modifications to unit systems or equipment that affect nuclear safety.

5.1.2 The [Shift ~~Supervisor (SS)~~] shall be responsible for the control room command function. A management directive to this effect, signed by the [highest level of corporate or site management] shall be issued annually to all station personnel. During any absence of the [~~SS~~] from the control room while ~~the~~ unit is in MODE 1, 2, or 3, an individual with ~~a valid~~ Senior Reactor Operator (SRO) license shall be designated to assume the control room command function. During any absence of the [~~SS~~] from the control room while ~~the unit is SS~~ in MODE 4 or 5, an individual with ~~a valid~~ SRO license or Reactor Operator license shall be designated to assume the control room command function.

5.0 ADMINISTRATIVE CONTROLS

5.2 Organization

5.2.1 Onsite and Offsite Organizations

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting safety of the nuclear power plant.

a. Lines of authority, responsibility, and communication shall be defined and established throughout highest management levels, intermediate levels, and all operating organization positions. These relationships shall be documented and updated, as appropriate, in organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the ~~[FSAR];~~

b. ~~The [Plant Superintendent]~~ shall be responsible for overall safe operation of the plant and shall have control over those onsite activities necessary for safe operation and maintenance of the plant;

c. The ~~[a specified]~~ corporate executive ~~[position] shall have corporate~~ responsibility for ~~overall plant nuclear safety and~~ shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety; and

d. The individuals who train the operating staff, carry out health physics, or perform quality assurance functions may report to the appropriate onsite manager; however, these individuals shall have sufficient organizational freedom to ensure their independence from operating pressures.

5.2.2 Unit Staff

The unit staff organization shall ~~be as follows~~:

a. ~~Each~~ on-duty shift ~~shall~~ be composed of at least ~~the minimum shift crew~~ composition ~~shown~~ in Table ~~5.2.2-1~~.

(continued)

INSERT A FOR NUREG 5.1

5.1.1 The plant manager shall provide direct executive oversight over all aspects of Plant Hatch.

5.1.2 An assistant plant manager shall be responsible for overall unit operation, except for the Radiological Environmental Monitoring Program as described below and for delegation in writing of the succession of this responsibility during his absence. Certain plant support functions shall also be the responsibility of an assistant plant manager.

5.1.3 The plant manager or his designee shall be responsible for the Radiological Environmental Monitoring Program and for the writing of the Annual Radiological Environmental Operating Report.

5.1.4 Each of the individuals in Specification 5.1.1 through Specification 5.1.3 is responsible for the accuracy of the procedures needed to implement his responsibilities.

5.2 Organization

5.2.2 Unit Staff (continued)

For each unit that contains fuel

b. At least one licensed Reactor Operator (RO) shall be present in the control room ~~when fuel is~~ in the reactor. In addition, while the unit is in MODE 1, 2, or 3, at least one licensed Senior Reactor Operator (SRO) shall be present in the control room.

An individual qualified to implement radiation protection procedures

~~A [Health Physics Technician]~~ shall be on site when fuel is in the reactor. The position may be vacant for not more than 2 hours, in order to provide for unexpected absence, provided immediate action is taken to fill the required position.

d. ~~Either a licensed SRO or licensed SRO limited to fuel handling who has no concurrent responsibilities during this operation shall be present during fuel handling and shall directly supervise all CORE ALTERATIONS.~~

e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety related functions (e.g., licensed SROs, licensed ROs, health physicists, auxiliary operators, and key maintenance personnel).

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work ~~a~~ [8 or 12] ~~hour day~~, nominal 40 hour week, while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shutdown for refueling, major maintenance, or major plant modification, on a temporary basis the following guidelines shall be followed:

1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time;

2. An individual should not be permitted to work more than 16 hours in any 24 hour period, nor more than 24 hours in any 48 hour period, nor more than 72 hours in any 7 day period, all excluding shift turnover time;

(e.g., licensed and non-licensed operations personnel, health physics technicians, key maintenance personnel, etc.).

(continued)

5.2 Organization

5.2.2 Unit Staff (continued)

3. A break of at least 8 hours should be allowed between work periods, including shift turnover time;

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized ~~in advance~~ by the [Plant Superintendent] or his designee, in accordance with approved administrative procedures, or by higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation.

Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by ~~the [Plant Superintendent]~~ or his designee to ensure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

OR

The amount of overtime worked by unit staff members performing safety related functions shall be limited and controlled in accordance with the NRC Policy Statement on working hours (Generic Letter 82-12).

f. The [Operations Manager ~~or Assistant Operations Manager~~] shall hold an SRO license.

g. The Shift Technical Advisor (STA) shall provide advisory technical support to the Shift Supervisor ~~(SS)~~ in the areas of thermal hydraulics, reactor engineering, and plant analysis with regard to the safe operation of the unit.

In addition, the STA shall meet the qualifications specified by the Commission Policy Statement on Engineering Expertise on Shift.

5.7.2.2 Process Control Program (PCP) (continued)

b. Shall be effective after review and acceptance by the [review method of Specification 5.5.1] and the approval of the [Plant Superintendent].

Offsite Dose Calculation Manual (ODCM)

a. The 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 and trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program; and

b. The ODCM shall also contain the Radioactive Effluent Controls and Radiological Environmental Monitoring programs required by Specification 5.7.2, and descriptions of the information that should be included in the Annual Radiological Environmental Operating, and Radioactive Effluent Release reports required by Specification [5.9.1.3] and Specification [5.9.1.4].

Licensee initiated changes to the ODCM:

a. Shall be documented and records of reviews performed shall be retained. This documentation shall contain:

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

2. a determination that the change(s) maintain the levels of radioactive effluent control required by 10 CFR 20.106, 40 CFR 190, 10 CFR 50.36a, and 10 CFR 50, Appendix I, and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations;

b. Shall become effective after review and acceptance by the [review method of Specification 5.5.1] and the approval of the [Plant Superintendent]; and

(continued)

5.5.1 ~~5.7.2.3~~ Offsite Dose Calculation Manual (ODCM) (continued)

c. Shall be submitted to the NRC in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Radioactive Effluent Release Report for the period of the report in which any change in 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 (i.e., month and year) the change was implemented.

5.5.2 ~~5.7.2.4~~ Primary Coolant Sources Outside Containment

This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include ~~the~~ Low ~~Pressure~~ Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, ~~hydrogen recombiner, process sampling, and standby gas treatment~~ and Reactor Water Cleanup. The program shall include the following:

a. Preventive maintenance and periodic visual inspection requirements; and

b. ~~Integrated~~ leak test requirements for each System at refueling cycle intervals or less.

5.7.2.5 In Plant Radiation Monitoring

This program provides controls to ensure the capability to accurately determine the airborne iodine concentration in vital areas under accident conditions. This program shall include the following:

a. Training of personnel;

b. Procedures for monitoring; and

c. Provisions for maintenance of sampling and analysis equipment.

, to the extent permitted by system design and radiological conditions,

(continued)

NUREG 1433 COMPARISON DOCUMENT - BASES

BASES

would not be met in the Applicability desired to be entered

LCO 3.0.3 (continued)

assemblies in the spent fuel storage pool." Therefore, this LCO can be applicable in any or all MODES. If the LCO and the Required Actions of LCO 3.7.8 are not met while in MODE 1, 2, or 3, there is no safety benefit to be gained by placing the unit in a shutdown condition. The Required Action of LCO 3.7.8 of "Suspend movement of irradiated fuel assemblies in the spent fuel storage pool" is the appropriate Required Action to complete in lieu of the actions of LCO 3.0.3. These exceptions are addressed in the individual Specifications.

GP.5

GP.5

LCO 3.0.4

LCO 3.0.4 establishes limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met. It precludes placing the unit in a ~~different~~ MODE or other specified condition when the following exist:

stated in that Applicability (e.g., Applicability desired to be entered)

a. The requirements of ~~the~~ LCO, ~~in the MODE or other specified condition to be entered, are not met~~; and

if the Applicability were entered,

Unit conditions are such that

b. Continued noncompliance with these LCO requirements, would result in the unit being required to ~~be placed in a MODE or other specified condition in which the LCO does not apply~~ to comply with the Required Actions.

GP.5

exit the Applicability desired to be entered

Compliance with Required Actions that permit continued operation of the unit for an unlimited period of time in a MODE or other specified condition provides an acceptable level of safety for continued operation. This is without regard to the status of the unit before or after the MODE change. Therefore, in such cases, entry into a MODE or other specified condition in the Applicability may be made in accordance with the provisions of the Required Actions. The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before ~~unit startup~~.

entering an associated MODE or other specified condition in the Applicability

GA.4

The provisions of LCO 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS. In addition, the provisions of LCO 3.0.4 shall not prevent changes in MODES

(continued)

BASES

any unit - GP 4

LCO 3.0.4 (continued) or other specified conditions in the Applicability that result from ~~a normal~~ shutdown.

Exceptions to LCO 3.0.4 are stated in the individual Specifications. Exceptions may apply to all the ACTIONS or to a specific Required Action of a Specification.

GA 4

INSERT B6

Surveillances do not have to be performed on the associated inoperable equipment (or on variables outside the specified limits), as permitted by SR 3.0.1. Therefore, changing MODES or other specified conditions while in an ACTIONS Condition, either in compliance with LCO 3.0.4 or where an exception to LCO 3.0.4 is stated, is not a violation of SR 3.0.1 or SR 3.0.4 for those Surveillances that do not have to be performed due to the associated inoperable equipment. However, SRs must be met to ensure OPERABILITY prior to declaring the associated equipment OPERABLE (or variable within limits) and restoring compliance with the affected LCO.

LCO 3.0.5 LCO 3.0.5 establishes the allowance for restoring equipment to service under administrative controls when it has been removed from service or declared inoperable to comply with ACTIONS. The sole purpose of this Specification is to provide an exception to LCO 3.0.2 (e.g., to not comply with the applicable Required Action(s)) to allow the performance of SRs to demonstrate:

D

a. The OPERABILITY of the equipment being returned to service; or

b. The OPERABILITY of other equipment.

The administrative controls ensure the time the equipment is returned to service in conflict with the requirements of the ACTIONS is limited to the time absolutely necessary to perform the allowed SRs. This Specification does not provide time to perform any other preventive or corrective maintenance.

An example of demonstrating the OPERABILITY of the equipment being returned to service is reopening a containment

(continued)

Insert B6

LCO 3.0.4 is only applicable when entering MODE 3 from MODE 4, MODE 2 from MODE 3 or 4, or MODE 1 from MODE 2. Furthermore, LCO 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, or 3. The requirements of LCO 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

BASES

GA.3

or up to the limits of the specified Frequency, whichever is less

SR 3.0.3 (continued)

period of up to 24 hours applies from the point in time that it is discovered that the Surveillance has not been ~~SRs~~ performed in accordance with SR 3.0.2, and not at the time that the specified Frequency was not met.

This delay period provides adequate time to complete Surveillances that have been missed. This delay period permits the completion of a Surveillance before complying with Required Actions or other remedial measures that might preclude completion of the Surveillance.

The basis for this delay period includes consideration of unit conditions, adequate planning, availability of personnel, the time required to perform the Surveillance, the safety significance of the delay in completing the required Surveillance, and the recognition that the most probable result of any particular Surveillance being performed is the verification of conformance with the requirements.

When a Surveillance with a Frequency based not on time intervals, but upon specified unit conditions or operational situations, is discovered not to have been performed when specified, SR 3.0.3 allows the full delay period of 24 hours to perform the Surveillance.

SR 3.0.3 also provides a time limit for completion of Surveillances that become applicable as a consequence of MODE changes imposed by Required Actions.

Failure to comply with specified Frequencies for SRs is expected to be an infrequent occurrence. Use of the delay period established by SR 3.0.3 is a flexibility which is not intended to be used as an operational convenience to extend Surveillance intervals.

If a Surveillance is not completed within the allowed delay period, then the equipment is considered inoperable or the variable is considered outside the specified limits and the Completion Times of the Required Actions for the applicable LCO Conditions begin immediately upon expiration of the delay period. If a Surveillance is failed within the delay period, then the equipment is inoperable, or the variable is outside the specified limits and the Completion Times of the

(continued)

BASES

SR 3.0.3 (continued)

Required Actions for the applicable LCO Conditions begin immediately upon the failure of the Surveillance.

Completion of the Surveillance within the delay period allowed by this Specification, or within the Completion Time of the ACTIONS, restores compliance with SR 3.0.1.

SR 3.0.4

SR 3.0.4 establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability. This Specification ensures that system and component OPERABILITY requirements and variable limits are met before entry into MODES or other specified conditions in the Applicability for which these systems and components ensure safe operation of the unit. ~~This Specification applies to changes in MODES or other specified conditions in the Applicability associated with unit shutdown as well as startup.~~

GP.3

Insert SR 3.0.4

The provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that are required to comply with ACTIONS.

In addition, the provisions of SR 3.0.4 shall not prevent changes in MODES or other specified conditions in the Applicability that result from any unit shutdown.

GP.4

The precise requirements for performance of SRs are specified such that exceptions to SR 3.0.4 are not necessary. The specific time frames and conditions necessary for meeting the SRs are specified in the Frequency, in the Surveillance, or both. This allows performance of Surveillances when the prerequisite condition(s) specified in a Surveillance procedure require entry into the MODE or other specified condition in the Applicability of the associated LCO prior to the performance or completion of a Surveillance. A Surveillance that could not be performed until after entering the LCO Applicability would have its Frequency specified such that it is not "due" until the specific conditions needed are met. Alternately, the Surveillance may be stated in the form of a Note as not required (to be met or performed) until a particular event, condition, or time has been reached. Further discussion of the specific formats of SRs' annotation is found in Section 1.4, Frequency.

GP.4 INSERT 3.0.4 B

Insert SR 3.0.4

However, in certain circumstances, failing to meet an SR will not result in SR 3.0.4 restricting a MODE change or other specified condition change. When a system, subsystem, division, component, device, or variable is inoperable or outside its specified limits, the associated SR(s) are not required to be performed per SR 3.0.1, which states that surveillances do not have to be performed on inoperable equipment. When equipment is inoperable, SR 3.0.4 does not apply to the associated SR(s) since the requirement for the SR(s) to be performed is removed. Therefore, failing to perform the Surveillance(s) within the specified Frequency, on equipment that is inoperable, does not result in an SR 3.0.4 restriction to changing MODES or other specified conditions of the Applicability. However, since the LCO is not met in this instance, LCO 3.0.4 will govern any restrictions that may (or may not) apply to MODE or other specified condition changes.

The provisions of this Specification should not be interpreted as endorsing the failure to exercise the good practice of restoring systems or components to OPERABLE status before entering an associated MODE or other specified condition in the Applicability.

Insert 3.0.4 B

SR 3.0.4 is only applicable when entering MODE 3 from MODE 4, MODE 2 from MODE 3 or 4, or MODE 1 from MODE 2. Furthermore, SR 3.0.4 is applicable when entering any other specified condition in the Applicability only while operating in MODE 1, 2, or 3. The requirements of SR 3.0.4 do not apply in MODES 4 and 5, or in other specified conditions of the Applicability (unless in MODE 1, 2, or 3) because the ACTIONS of individual Specifications sufficiently define the remedial measures to be taken.

INSERT K

INSERT L for proposed BASES B 3.3.6.1

The Allowable Values correspond to ≤ 215 (*U1 only) / 200 (*U2 only) inches water column for HPCI and ≤ 90 (*U1 only) / 139 (*U2 only) inches water column for RCIC, which are the parameters monitored on control room instruments.

INSERT TO
B 3.3-163

NUREG 1433 COMPARISON DOCUMENT - JUSTIFICATION FOR DEVIATION

JUSTIFICATION FOR DEVIATION FROM NUREG 1433
ITS: SECTION 3.0 - LCO AND SR APPLICABILITY

PLANT SPECIFIC DIFFERENCES

P.1 The Specification number is changed to be consistent with the proper number in Section 5.0. The Safety Function Determination Program number was modified to be 5.5.12 by NUREG change package BWOG-09, Item C.26, but the correct number for Plant Hatch is 5.5.10.

P.2 Grammatical errors are corrected.

P.3 Brackets are removed since the information is correct.

GENERIC APPROVED/PENDING CHANGES TO NUREG 1433

GA.1 Change approved per package BWOG-01 Items C.10 and C.11, 3/20/93.

GA.2 Change approved per package BWR-02 Items C.6, C.10, and C.11, 3/20/93.

GA.3 Change approved per package BWR-05 Items C.7, C.11 Rev 1, C.12, and C.15, 5/20/93 and 7/28/93.

GP.4 Changed to be consistent with NUREG change package BWR-26 Item C.1. (BWR-10 involved some of these same changes, but was replaced in its entirety by BWR-26.)

GA.5 Changed to be consistent with NUREG change package BWR-05 Items C.10, and C.13, Rev.2, June 7, 1994.

GA.6 Changed to be consistent with NUREG change package BWR-07, Rev.1, Item C.1. The correct Hatch ITS number was also used, 9/8/93.

GA.7 Changed to be consistent with NUREG change package BWR-18, Item C.8, 3/29/94.

The final status of items annotated in the NUREG 1433 Comparison Documents as GP is shown here.

JUSTIFICATION FOR DEVIATION FROM NUREG 1433
ITS: SECTION 5.0 - ADMINISTRATIVE CONTROLS

PLANT SPECIFIC DIFFERENCES

P.1 The current requirements in Technical Specification 6.1, "Responsibility," have been used in place of the ITS 5.1.1 provisions. This is a plant preference to retain the current description of the responsibilities of the plant manager, the assistant plant managers. The ITS does not reflect plant specific organization and responsibilities assigned to those positions. Plant specific titles are replaced with generic titles and ITS section 5.2.1.a is revised to include a requirement for the plant specific titles of those personnel fulfilling the responsibilities to be included in the FSAR. Replacement of plant specific titles and the addition of a reference to the FSAR do not change the responsibilities but prevent amendment requests for administrative changes.

P.2 The brackets have been removed and the proper values/words have been used for each of the two units, or the bracketed material was not used for Plant Hatch. The specifications were renumbered to reflect the deletion of requirements by other comment numbers.

P.3 Current Technical Specifications wording was used to clarify that for dual unit sites, at least one licensed RO shall be present in the control room for each unit that contains fuel in the reactor.

P.4 The examples are generalized for Unit staff positions who perform safety-related work and whose working hours are limited. The examples in the NUREG may not include all the positions affected and are subject to change. As stated in ITS 5.2.2.e, administrative procedures will contain this information and, as such, the generalized words are sufficient.

P.5 The bracketed information is not in the current Technical Specifications and is not retained in the Plant Hatch ITS. A nominal 40 hour work week is specified and is adequate to ensure the intent of the requirement.

P.6 Current Technical Specifications do not require authorization in advance of any deviations from the overtime guidelines. The "in advance" provision is overly restrictive and may not be practical on back shifts.

P.7 The current Technical Specifications wording for who may approve deviations from the overtime guidelines is used in place of the NUREG wording. The proposed change follows in the intent of the NUREG by specifying appropriate Plant Hatch levels of management for this approval.