



Illinois Power Company
Clinton Power Station
P.O. Box 678
Clinton, IL 61727
Tel 217 935-5623
Fax 217 937 1632

John G. Cook
Vice President

U-602364
L47-940 - 3 LP
8E.100a
JGC-326-94
October 31, 1994
10CFR50.90

Docket No. 50-461

Document Control Desk
Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Clinton Power Station Final Revision to Previously
Submitted Proposed Amendment of Facility Operating
License No. NPF-62 (References: IP Letters U-602196
dated October 26, 1993 and U-602283 dated April 26, 1994)

Dear Sir:

By letter dated October 26, 1993 (reference letter U-602196), Illinois Power (IP) applied for amendment of Facility Operating License No. NPF-62, Appendix A - Technical Specifications, for Clinton Power Station (CPS). By that application, IP requested a complete revision of the CPS Technical Specifications to convert to the Improved Technical Specifications (ITS) per the guidance provided by NUREG-1434, "Improved BWR-6 Technical Specifications," Revision 0, dated September 1992. Enclosure 2 of IP's October 26, 1993 submittal was organized by Technical Specification section (including the associated Bases section). For each section within Enclosure 2 of IP's October 26, 1993 submittal, IP provided markups of the current CPS Technical Specifications (including justifications and No Significant Hazards Consideration evaluations for each of the changes from the current CPS Technical Specifications) and markups of the associated NUREG-1434 Technical Specifications (including justifications for deviations).

Subsequent to IP's October 26, 1993 submittal, and as a result of additional guidance provided by the NRC staff for improving the scope and content of the Administrative Controls section of the Technical Specifications, additional proposed changes were submitted to the NRC staff by followup IP letter U-602283 dated April 26, 1994. The changes were provided in the form of replacement pages to replace the corresponding pages in Enclosure 2 of IP's October 26, 1993 submittal.

Earlier this year, in accordance with a pre-arranged program to generically review the application of NUREG-1434 to the BWR-6 plants, the NRC staff began its review of IP's ITS submittal along with the ITS submittals for the other three BWR-6 plants.

9411080269 941031
PDR ADDCK 05000461
P PDR

ADD 1/

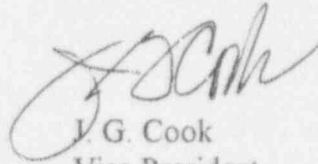
Representatives from the BWR-6 plants met regularly with the NRC staff to resolve comments, issues, and open items identified in the course of the staff's review. The staff's BWR-6 review is now essentially complete, and all open items related to the CPS-specific review have been resolved. Resolution of the comments, issues, and open items stemming from the NRC staff's review requires changes to be made to IP's ITS submittal. By this letter, those changes are thus requested. The changes are reflected in Enclosure 4 to this letter, and similar to IP's April 26, 1994 letter, the changes are provided in the form of replacement pages for the corresponding pages provided in Enclosure 2 of IP's October 26, 1993 submittal. Due to the large scope of changes, the changes/replacement pages provided in Enclosure 4 of this letter are organized by Technical Specification section, similar to the October 26, 1993 submittal.

Other information required to support CPS's conversion to the Improved Technical Specifications is provided in additional Enclosures to this letter. For assuring that requirements which are to be relocated from the Technical Specifications will continue to be adequately controlled (i.e., properly maintained and/or reviewed when changes to those requirements are proposed), a matrix is provided as Enclosure 2 to this letter. The matrix identifies each relocated Technical Specification (by its current number), the corresponding new location (e.g., the Updated Safety Analysis Report), and the applicable regulation or requirement [e.g., 10 CFR50.71(e)] that provides controls on future changes to these requirements. Enclosure 3 is a matrix which provides an assessment of the impact of new ITS Technical Specification 3.0.4 on each Technical Specification (Limiting Condition for Operation) with respect to whether or how mode changes are permitted while operating under the provisions of the associated Action statement, particularly during shutdown conditions. This matrix was requested as part of the resolution of generic changes to the ITS Technical Specification 3.0.4. Enclosure 5 is a complete, typed copy of the new Technical Specifications for CPS, including the Table of Contents, and Enclosure 6 is a complete, typed copy of the associated Bases. Enclosures 5 and 6 reflect incorporation of all the changes requested by IP in its October 26, 1993 and April 26, 1994 applications, as modified by the changes indicated in Enclosure 4 to this letter. Finally, an affidavit supporting the facts stated in this letter and its enclosures is provided as Enclosure 1 to this letter.

IP has reviewed the proposed changes against the criteria of 10CFR51.22 for categorical exclusion from environmental impact considerations. The proposed changes do not involve a significant hazards consideration, or significantly increase the amounts or change the types of effluents that may be released off-site, nor do they significantly increase individual or cumulative occupational radiation exposures. Based on the foregoing, IP concludes the proposed changes meet the criteria given in 10CFR51.22(c)(9) for a categorical exclusion from the requirement for an Environmental Impact Statement.

This request has been reviewed by the CPS Facility Review Group (FRG).

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'J. G. Cook', is written over the typed name.

J. G. Cook
Vice President

TBE/csm

cc: NRC Clinton Licensing Project Manager
NRC Resident Office, V-690
Regional Administrator, Region III, USNRC
Illinois Department of Nuclear Safety

Enclosure 1
to U-602364

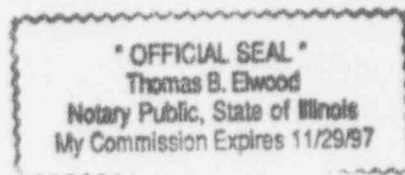
STATE OF ILLINOIS
COUNTY OF DEWITT

John G. Cook, being first duly sworn, deposes and says: That he is Vice President of Illinois Power Company; that the application for amendment of Facility Operating License NPF-62 has been prepared under his supervision and direction; that he knows the contents thereof, and that to the best of his knowledge and belief said letter and the facts contained therein are true and correct.

Date: This 31st day of October 1994.

Signed: _____

STATE OF ILLINOIS }
 } SS.
DEWITT COUNTY }



Subscribed and sworn to before me this 31st day of October 1994.

Thomas B. Elwood
(Notary Public)

SUMMARY OF CLINTON POWER STATION
RELOCATED TECHNICAL SPECIFICATIONS

EXISTING TS	TITLE	RELOCATION CONTROLS
4.0.5	Inservice Inspection and Testing Programs	10 CFR 50.55a/ORM
3/4.1.3.6	Control Rod Drive Housing Support	ORM
3/4.3.1.1.7	MSL Radiation - High Scram	ORM
3/4.3.2.1.1 3/4.3.2.2.b	MSL Radiation - High MSL and CRVICS Isolation Functions	ORM
3/4.3.2.2.g 3/4.3.2.3.d 3/4.3.2.3.g 3/4.3.2.4.f 3/4.3.2.4.h 3/4.3.2.4.n 3/4.3.2.5.b	Area Differential Temperature - High Isolation Functions for MSL, Reactor Water Cleanup, RCIC, and RHR systems.	ORM
3/4.3.3.A.2.h 3/4.3.3.B.2.h	ADS Manual Inhibit Functions	ITS 3.3.5.1 BASES/USAR 7.3-9
3/4.3.6.2 3/4.3.6.3 3/4.3.6.4 3/4.3.6.5 3/4.3.6.6	Control Rod Block Instrumentation for APRM, SRM, IRM, Scram Discharge Volume, and Reactor Coolant System Recirculation Flow Functions.	ORM
3/4.3.7.1.2	Area Radiation Monitors	ORM
3/4.3.7.2	Seismic Monitoring Instrumentation	ORM
3/4.3.7.3	Meteorological Monitoring Instrumentation	ORM
3/4.3.7.7	Traversing In-Core Probe System	ORM
3/4.3.7.8	Chlorine Detection System	In accordance with Footnote #, this TS is no longer applicable.
3/4.3.7.10	Loose-Part Detection System	ORM

SUMMARY OF CLINTON POWER STATION
RELOCATED TECHNICAL SPECIFICATIONS
(continued)

EXISTING TS	TITLE	RELOCATION CONTROLS
3/4.3.7.11	Main Condenser Offgas Treatment System Explosive Gas Monitoring Instrumentation	ORM
3/4.3.9.2	Feedwater/Main Turbine Trip System	ORM
3/4.3.9.3.f	Suppression Pool Makeup Mode Switch Permissive Function	ITS 3.6.2.4 BASES
3/4.3.10	Nuclear System Protection System - Self Test System	ORM
3/4.4.4	Reactor Coolant System Chemistry	ORM
3/4.4.8	Reactor Coolant System Structural Integrity	ORM
3/4.7.4	Snubbers	ORM
3/4.7.5	Sealed Source Contamination	ORM
3/4.8.4.1	Containment Penetration Conductor Overcurrent Protective Devices	ORM
3/4.8.4.2	Motor Operated Valves Thermal Overload Protection	ORM
3/4.9.4	Refueling Operations Decay Time	ORM
3/4.9.5	Refueling Operations Communications	ORM
3/4.9.6.1 3/4.9.6.2	Refueling Operations Fuel Handling Equipment Refueling Platform and Auxiliary Platform	ORM
3/4.9.7	Refueling Operations Crane Travel - Spent Fuel Storage Pool, Upper Containment Fuel Pool, and New Fuel Storage Vault	ORM
3/4.9.12	Refueling Operations Inclined Fuel Transfer System	ORM
5.2	Containment Design Features	USAR 6.2

SUMMARY OF CLINTON POWER STATION
RELOCATED TECHNICAL SPECIFICATIONS
(continued)

EXISTING TS	TITLE	RELOCATION CONTROLS
5.4	Reactor Coolant System Design Features	USAR Table 5.4-1, Figure 5.1-2
5.5	Meteorological Tower Location Design Features	USAR Figure 2.3-18
6.1.2	Control Room Command Management Directive	ORM
6.2.2.a Table 6.2.2-1 6.2.2.d	Minimum Shift Composition Minimum Shift Composition SRO Present During Fuel Handling	10 CFR 50.54 (m) /ORM
6.2.2.e	Fire Brigade Composition	ORM/License Condition 2.F
6.2.2.f	Nominal Work Week	ORM
6.2.3	ISEG	ORM
6.4	Training	ORM/10CFR55
6.5	Review and Audits	ORM/10 CFR 50.54
6.6	Reportable Event Action	10 CFR 50.73/ORM
6.7	Safety Limit Violation	10 CFR 50.72/50.73/ORM
6.8.1.e 6.8.1.f	Security Plan Implementation Emergency Plan Implementation	10 CFR 50.54/ORM
6.8.1.g 6.8.4.e	Fire Protection Program Implementation	ORM/License Condition 2.F
6.8.2 6.8.3	Review and Approval Temporary Changes	10 CFR 50.54/ORM
6.8.4.b	In-Plant Radiation Monitoring	ORM
6.8.4.g	Radiological Environmental Monitoring Programs	ODCM/ORM

SUMMARY OF CLINTON POWER STATION
RELOCATED TECHNICAL SPECIFICATIONS
(continued)

EXISTING TS	TITLE	RELOCATION CONTROLS
6.9.1	Startup Report	ORM
6.9.1.5.c	Specific Activity Annual Report	10 CFR 50.72/50.73
6.9.2 (3/4.5.1 Action g) (4.8.1.1.3)	Special Reports: (ECCS Actuation Special Report) (DG Failure Special Report)	10 CFR 50.72/50.73 10 CFR 50.72/50.73
(3/4.3.7.5 Action 81.b)	(PAM Inoperability Special Report)	ITS 3.3.3.1 Bases
6.10	Record Retention	10CFR50.54/ 10CFR20/ 10CFR71/ORM
6.11	Radiation Protection Program	10CFR20/ORM
6.13	Process Control Program	10CFR20/ 10CFR61/ 10CFR71/ORM

ORM = Operational Requirements Manual controlled by 10 CFR 50.59.

ODCM = Controlled by Technical Specification 5.5.1.

USAR = Updated Safety Analysis Report controlled by 10 CFR 50.71(e).

ITS Bases = Controlled by Technical Specification 5.5.11.

Clinton Power Station
LCO 3.0.4 EVALUATION

October 29, 1994
Pg 1

LCO	New Allow	Applbty Xfer	Comments/Justification (Refer to Page 7)
3.1.1 SDM	n	All others	(See assumption 2.)
	n	M4 from M3, M4 from M5, M5 from M4	(See Note A.)
		M5 from M6	(See assumption 3.)
3.1.2 Rx Anomaly	n	M2 from M1	(See assumption 2.)
3.1.3 CRod OPER	n	M2 from M1	(See Note A and assumption 2.)
3.1.4 CRod Scram Tm	n	M2 from M1	(See assumption 2.)
3.1.5 CRod Accum	n	M2 from M1	(See Note A and assumption 2.)
3.1.6 CRod Pattern	n	to $\leq 20\%$ RTP	(See Note A for ≤ 8 rods not in compliance.) (See Assumption 2 for ≥ 9 rods.)
3.1.7 SLC System	n	M2 from M1	(See assumption 2.)
3.1.8 SDV Vent/Drn	n	M2 from M1	(See assumption 2.)
3.2.1 APLHGR	n	NA	No way to enter applicability except on startup
3.2.2 MCPR	n	NA	No way to enter applicability except on startup
3.2.3 LHGR	n	NA	No way to enter applicability except on startup
3.3.1.1 RPS	y	M2 from M1	For IRMs & APRM-Setdown: See Notes A and B.
	n	All others	(See Note A and assumption 2.)
3.3.1.2 SRM	y	to IRM $\leq R2$	See Note B
	n	M3 from M2, M3 from M4, M4 from M3, M4 from M5, M5 from M4	(See Note A)
	n	M5 from M6	(See assumption 3.)
3.3.2.1 CRod Block	n	ALL	(See Note A.)
3.3.3.1 Post Acc Mn	n	ALL	Existing 3.0.4 exception
3.3.3.2 Remote SD	n	ALL	Existing 3.0.4 exception
3.3.4.1 EOC-RPT	n	ALL	No way to enter applicability except on startup
3.3.4.2 ATWS-RPT	n	ALL	No way to enter applicability except on startup
3.3.5.1 ECCS Instr	n	ALL	(See Note A.)
3.3.5.2 RCIC Instr	n	ALL	(See Note A.)
3.3.6.1 PCI Instr	n	ALL	(See Note A and assumption 2.)

Clinton Power Station
LCO 3.0.4 EVALUATION

October 29, 1994
Pg 2

LCO	New Allow	Applbty Xfer	Comments/Justification (Refer to Page 7)
3.3.6.2 SCI Instr	n	ALL	(See Note A.)
3.3.6.3 RHR Cont. Spray Instr	n	ALL	(See Note A.)
3.3.6.4 SPMU Instr	n	ALL	(See Note A.)
3.3.6.5 LLS Instr	n	ALL	(See Note A and assumption 2.)
3.3.7.1 CRV Instr	n	ALL	(See Note A.)
3.3.8.1 LOP Instr	n	ALL	(See Note A.)
3.3.8.2 RPS EPAs	n	M2 from M1, M3 from M2, M4 from M3	(See assumption 2.)
	n	M4 from M5, M5 from M4	(See Note A and assumption 3.)
	n	M5 from M6	(See Note A.)
3.4.1 Recirc Opertrn	n	M2 from M1	(See Note A and assumption 2.)
3.4.2 Flow CVs	n	ALL	(See Note A and assumption 2)
3.4.3 Jet Pumps	n	M2 from M1	(See assumption 2.)
3.4.4 SRVs	n	M2 from M1 M3 from M2	(See assumption 2.)
3.4.5 Rx Leakage	n	M2 from M1 M3 from M2	(See assumption 2.)
3.4.6 PIVs	n	M2 from M1 M3 from M2	(See Note A and assumption 2.)
3.4.7 Leak Det Inst	n	M2 from M1 M3 from M2	Existing exceptions to 3.0.4, see Note A and assumption 2.
3.4.8 Specf Actvty	n	M2 from M1 M3 from M2	(See assumption 2.) Also, existing exception to 3.0.4.
3.4.9 RHR-SDC: Hot	n	ALL	Existing exception to 3.0.4
3.4.10 RHR-SDC: Cold	n	M4 from M3	Would be MODE change required by ACTIONs of LCO 3.4.9.
	n	M4 from M5	(See Note A.)
3.4.11 PT Limits	n	NA	Applicability has no stated conditions that can be entered.
3.4.12 Rx Pressure	n	M2 from M1	(See assumption 2.)
3.5.1 ECCS-Op	n	M2 from M1 M3 from M2 to ≤ 150 psig	(See assumption 2.)
3.5.2 ECCS-SD	n	ALL	Would be MODE change required by ACTIONs of LCO 3.5.1. Also see Note A.

Clinton Power Station
LCO 3.0.4 EVALUATION

October 29, 1994
Pg 3

LCO	New Allow	Applbty Xfer	Comments/Justification (Refer to Page 7)
3.5.3 RCIC	n	M2 from M1 M3 from M2	(See assumption 2.)
3.6.1.1 Cntmt OPER	n	M2 from M1 M3 from M2	(See assumption 2.)
3.6.1.2 Cntmt AirLk	n	M2 from M1 M3 from M2	(See Note A and assumption 2.)
3.6.1.3 PCI Valves	n	M2 from M1 M3 from M2	(See Note A and assumption 2.)
	n	Start: fuel move, CORE ALT, OPDRV M5 from M6	(See assumption 3.)
	n	M4 from M5, M5 from M4	(See Note A.)
3.6.1.4 Cntmt Press	n	M2 from M1 M3 from M2	(See assumption 2.)
3.6.1.5 Cntmt Temp	n	M2 from M1 M3 from M2	(See assumption 2.)
3.6.1.6 LLS Valves	n	M2 from M1 M3 from M2	(See assumption 2.)
3.6.1.7 RHR Cntmt Spray	n	M2 from M1 M3 from M2	(See assumption 2.)
3.6.1.8 MSIV-LCS	n	M2 from M1 M3 from M2	(See assumption 2.)
3.6.2.1 SPool Temp	n	M2 from M1 M3 from M2	(See assumption 2.)
3.5.2.2 SPool Lvl	n	M2 from M1 M3 from M2	(See assumption 2.)
3.6.2.3 SPool Cool	n	M2 from M1 M3 from M2	(See assumption 2.)
3.6.2.4 SPool Makeup	n	M2 from M1 M3 from M2	(See assumption 2.)
3.6.3.1 H2 Recm-Op	n	M2 from M1	Existing exception to 3.0.4 (and assumption 2.)
3.6.3.2 H2 Igniters	n	M2 from M1	Existing exception to 3.0.4 (and assumption 2.)
3.6.3.3 DW Purge Sys	n	M2 from M1	Existing exception to 3.0.4 (and assumption 2.)

Clinton Power Station
LCO 3.0.4 EVALUATION

October 29, 1994
Pg 4

LCO	New Allow	Applbty Xfer	Comments/Justification (Refer to Page 7)
3.6.4.1 Scndry Cntmt	n	M2 from M1 M3 from M2	(See assumption 2.)
	n	Start: Fuel move, CORE ALT, OPDRV	(See assumption 3.)
3.6.4.2 SCI Valves	n	M2 from M1 M3 from M2	(See Note A and assumption 2.)
	n	Start: Fuel move, CORE ALT, OPDRV	(See Note A and assumption 3.)
3.6.4.3 SGT Sys	n	M2 from M1 M3 from M2	(See assumption 2.)
	n	Start: Fuel move, CORE ALT, OPDRV	See Note A and (for 2 inop) assumption 3.
3.6.5.1 DW	n	ALL	(See assumption 2)
3.6.5.2 DW Air Lock	n	ALL	(See Note A and assumption 2)
3.6.5.3 DW Isol Vlvs	n	ALL	(See Note A and assumption 2)
3.6.5.4 DW Press	n	ALL	(See assumption 2)
3.6.5.5 DW Temp	n	ALL	(See assumption 2)
3.6.5.6 DW Vacuum Relief	n	ALL	(See Note A and assumption 2)
3.7.1 Div 1 and 2 SX and UHS	n	M2 from M1 M3 from M2	(See assumption 2.)
3.7.2 Div 3 SX	n	ALL	(See Note A.)
3.7.3 CRm Vent	n	M2 from M1 M3 from M2	(See assumption 2.)
	n	Start: Fuel move, CORE ALT, OPDRV	(See assumption 3 and Note A.)
3.7.4 CRm A/C	n	M2 from M1 M3 from M2	(See assumption 2.)
	n	Start: Fuel move, CORE ALT, OPDRV	(See assumption 3 and Note A.)

Clinton Power Station
LCO 3.0.4 EVALUATION

October 29, 1994
Pg 5

LCO	New Allow	Applbty Xfer	Comments/Justification (Refer to Page 7)
3.7.5 Offgas	n	M2 from M1 M3 from M2	(See assumption 2.)
3.7.6 Turb Bypass	n	NA	No way to enter Applicability except on startup
3.7.7 SPool Level	n	ALL	(See assumption 3.)
3.8.1 AC Sources-OP	n	M2 from M1 M3 from M2	(See assumption 2.)
3.8.2 AC Sources-SD	n	M4 from M3	MODE change required by ACTIONS of LCO 3.8.1.
	n	M4 from M5, M5 from M4	(See Note A.)
	n	M5 from M6	(Since this activity requires CORE ALTs, assumption 3 applies.)
	n	Start fuel move	(See assumption 3.)
3.8.3 Fuel Oil	n	ALL	(See Note A.)
3.8.4 DC Source-OP	n	M2 from M1 M3 from M2	(See Note A and assumption 2.)
3.8.5 DC Source-SD	n	M4 from M3	MODE change required by ACTIONS of LCO 3.8.4.
	n	M4 from M5, M5 from M4	(See Note A.)
	n	M5 from M6	(Since this activity requires CORE ALTs, assumption 3 applies.)
	n	Start fuel move	(See assumption 3.)
3.8.6 Battery Cell	n	ALL	(See Note A.)
3.8.7 Inverter-OP	n	M2 from M1 M3 from M2	(See Note A and assumption 2.)
3.8.8 Inverter-SD	n	M4 from M3	MODE change required by ACTIONS of LCO 3.8.7.
	n	M4 from M5, M5 from M4	(See Note A.)
	n	M5 from M6	(Since this activity requires CORE ALTs, assumption 3 applies.)
	n	Start fuel move	(See assumption 3.)
3.8.9 Distr-OP	n	M2 from M1 M3 from M2	(See Note A and assumption 2.)

Clinton Power Station
LCO 3.0.4 EVALUATIONOctober 29, 1994
Pg 6

LCO	New Allow	Applbty Xfer	Comments/Justification (Refer to Page 7)
3.8.10 Distr-SD	n	M4 from M3	MODE change required by ACTIONS of LCO 3.8.9.
	n	M4 from M5, M5 from M4	(See Note A.)
	n	M5 from M6	(Since this activity requires CORE ALTs, assumption 3 applies.)
	n	Start fuel move	(See assumption 3.)
3.9.1 R/F Intrlck	n	ALL	(See assumption 3.)
3.9.2 1-Rd-Out Inlk	n	ALL	(See assumption 3.)
3.9.3 CRod Position	n	ALL	(See assumption 3.)
3.9.4 CRod Pos Ind	n	M5 from M4, M5 from M6	(See Note A.)
3.9.5 CRod OP - R/F	n	ALL	(See assumption 3.)
3.9.6 RPV Lvl-Irrd	n	ALL	(See assumption 3.)
3.9.7 RPV Lvl-New	n	ALL	(See assumption 3.)
3.9.8 RHR-SDC Hi Lv	n	ALL	(See Note A.)
3.9.9 RHR-SDC Lo Lv	n	ALL	(See Note A.)
3.10.1 Ins Leak/Hyd	n	ALL	(See assumption 3 and Note A.)
3.10.2 Mode Sw Tst	n	ALL	Assumption 3 and LCO itself precludes entering Applicability.
3.10.3 1 Rd W/-Hot	n	ALL	See assumption 3 and Note A. Also LCO precludes entering applicability.
3.10.4 1 Rd W/-Cold	n	ALL	See assumption 3 and Note A. Also LCO precludes entering applicability.
3.10.5 1 Rd W/-RF	n	ALL	See assumption 3 and Note A. Also LCO precludes entering applicability.
3.10.6 Mult Rd W/- RF	n	ALL	See assumption 3 and Note A. Also LCO precludes entering applicability.
3.10.7 CRd Tst-OP	n	ALL	(See assumption 3.)
3.10.8 SDM Tst-RF	n	ALL	See assumption 3 and Note A. Also LCO precludes entering applicability.
3.10.9 Trng S/U	n	ALL	(See assumption 3.)

Clinton Power Station
LCO 3.0.4 EVALUATIONOctober 29, 1994
Pg 7Assumptions

1. Existing LCO 3.0.4 applies to any and all changes in the stated Applicability. Proposed LCO 3.0.4 only restricts "startup" activities in MODES 1, 2, and 3. Therefore, this review is evaluating gained MODE change flexibility when:
 - A) shutting down, and/or
 - B) any change in condition stated in the Applicability while "shut down".
2. If the ACTIONS ultimately require a shutdown through some MODES in the Applicability, any early shutdown (prior to the absolutely-required shutdown, e.g., the second day of an allowed 7-day restoration) is automatically considered NOT precluded by the existing LCO 3.0.4.
3. If the ACTIONS to be entered require "Immediate" exit from the Applicability (e.g., Suspend handling of irradiated fuel -- Immediately) or restoration of compliance with the LCO it is judged to preclude the intentional entry into that Applicability, regardless of LCO 3.0.4.

Notes

"Mx" represents "MODE x"

"M6" represents DEFUELED

- A. There is no gained flexibility since there are no restrictions imposed by the LCO 3.0.4 contained in NUREG-1434 (the ACTIONS permit continued operation in the MODE desired to enter).
- B. The desire to shut down into this MODE results in ACTIONS that require continuation of the shutdown. Therefore, intentional entry into this MODE as part of a shutdown sequence is not safety significant since the ACTIONS entered are consistent with the "continued operation" of plant shut down.