

10CFR50.90

**PECO ENERGY**

PECO Energy Company  
Nuclear Group Headquarters  
965 Chesterbrook Boulevard  
Wayne, PA 19087-5691

May 16, 1995

Docket Nos. 50-277  
50-278  
License Nos. DPR-44  
DPR-56

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Subject: Peach Bottom Atomic Power Station, Units 2 and 3  
Revision A to TSCR 93-16  
Conversion to Improved Technical Specifications

References: (1) Letter from G. A. Hunger, Jr. (PECO Energy) to USNRC  
dated September 29, 1994

Dear Sir:

In Reference (1), PECO Energy Company submitted Technical Specifications Change Request (TSCR) 93-16, requesting changes to Appendixes A and B of the Facility Operating Licenses for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. This TSCR proposed an overall conversion of the current PBAPS Technical Specifications (TS) to the Improved Technical Specifications (ITS), as contained in NUREG 1433, "Standard Technical Specifications, General Electric Plants, BWR/4."

Revision A to TSCR 93-16 is the result of incorporation of NRC/Industry Generic Changes, resolution of NRC review comments, ITS implementation internal reviews, TSCRs submitted after September 29, 1994, disposition of a submittal open item, and resolution of issues related to single recirculation loop operation and Main Turbine Bypass System inoperable APLHGR limits. Enclosed is a detailed discussion of the changes and replacement pages for each of the pages affected by the changes of Revision A. Page insert and removal instructions have also been provided to facilitate updating TSCR 93-16 for Revision A.

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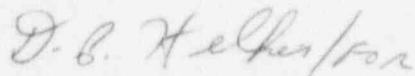
May 16, 1995

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We have determined that this revision does not alter our evaluation of any of the 10CFR50.59 standards, and therefore, does not effect our conclusion that Revision A to TSCR 93-16 does not constitute an unreviewed safety question. We have determined that the proposed revision does not affect the conclusions of the No Significant Hazards Consideration and the Environmental Assessment.

If you have any questions, please contact us.

Very truly yours,



G. A. Hunger, Jr.,  
Director - Licensing

TRL/bgr

Affidavit, Enclosure

cc: T. T. Martin, Administrator, Region I, USNRC  
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS  
R. R. Janati, Commonwealth of Pennsylvania

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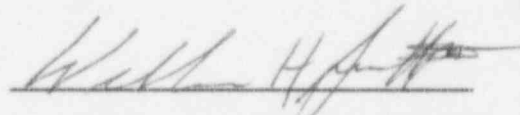
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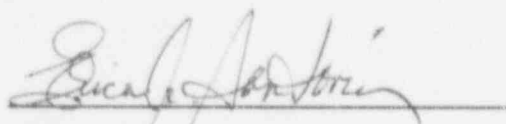
W. H. Smith, III being first duly sworn, deposes and says:

That he is Vice President of PECO Energy Company; the Applicant herein; that he has read the attached Revision A to Technical Specifications Change Request No. 93-16 for changes to the Peach Bottom Facility Operating Licenses DPR-44 and DPR-56, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.



Vice President

Subscribed and sworn to  
before me this 16<sup>th</sup> day  
of May 1995.



Notary Public

Notarial Seal  
Erica A. Santori, Notary Public  
Tredyffrin Twp., Chester County  
My Commission Expires July 10, 1995

## TSCR 93-16 REVISION A

Technical Specification Change Request (TSCR) 93-16 was submitted to the NRC on September 29, 1994. This TSCR proposed the overall conversion of the current Peach Bottom Atomic Power Station (PBAPS) Technical Specifications to the Improved Technical Specifications, as contained in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4."

Revision A to TSCR 93-16 is the result of incorporation of NRC/Industry Generic Changes, resolution of NRC review comments, ITS implementation internal reviews, TSCRs submitted after September 29, 1994, disposition of a submittal open item, and resolution of issues related to single recirculation loop operation and Main Turbine Bypass System inoperable APLHGR limits. Replacement pages have been provided for each of the pages affected by the changes of Revision A. Page insert and removal instructions have also been provided to facilitate updating TSCR 93-16 for Revision A.

### DISCUSSION/JUSTIFICATION:

The following and attached discussions/justifications are provided for the attached Revision A changes.

#### 1. Specification 1.3, Completion Times, pages 1.3-6 and 1.3-10

Example 1.3-3 and Example 1.3-6 are proposed to be revised to more adequately reflect BWR specific Technical Specification ACTIONS rather than PWR specific Technical Specification ACTIONS. This change is consistent with an Industry/NRC Generic Traveler to revise the BWR ITS NUREGs.

In Example 1.3-3, the Completion Times for Condition C are proposed to be revised from "72 hours" to "12 hours." The PBAPS ITS do not contain any Conditions similar to Example 1.3-3 Condition C; where the Completion Time for restoring multiple LCO requirements in a separate Condition is the same as the Completion Time for restoring a single LCO requirement. The discussion for Example 1.3-3 explains how multiple Condition entry works in the example, how separate Completion Times are tracked for each Condition in the example, and the proper application of the maximum Completion Time in Conditions A and B of the example. However, no reference of the specific Completion Times are ever made, with the exception of the maximum Completion Time, in the discussion of Example 1.3-3. The maximum Completion Time is not proposed to be modified by this change.

1. Specification 1.3, Completion Times, pages 1.3-6 and 1.3-10 (continued)

In Example 1.3-6, Required Action A.2 is proposed to be revised from "Reduce THERMAL POWER to  $\leq 50$  % RTP" to "Place channel in trip." The PBAPS ITS do not contain any Conditions similar to Example 1.3-6 Condition A; where optional Required Actions exist for an instrument channel inoperable and one of the Required Actions is to reduce power. The discussion for Example 1.3-6 explains how multiple Condition entry works in the example, how the logical connector works in the example, and the proper application of the Completion Time for Required Actions A.1 and A.2 of the example. However, no reference to the specific details of the Required Actions is ever made in the discussion of Example 1.3-6. Specific references to the Completion Times are made in the discussion of Example 1.3-6. The Completion Times are not proposed to be modified by this change.

The examples in Specification 1.3 are provided to help ensure the Completion Time convention in the ITS is understood and properly applied. No changes are required to the existing discussions of the examples as a result of these changes to the examples. Therefore, these changes do not impact the discussions of the associated examples. The changes are only to make the examples BWR specific. As a result, the changes do not impact the examples' use in helping to ensure the ITS Completion Time convention is understood and properly applied and have no impact on safety.

Corresponding changes have also been made to the Current Technical Specification (CTS) markups for Specification 1.0 on pages 25 of 74 and 29 of 74 (Unit 2) and on pages 62 of 74 and 66 of 74 (Unit 3).

2. LCO 3.0.4 and SR 3.0.4, pages 3.0-2, 3.0-5, B3.0-5, B3.0-6, B3.0-14, and B3.0-15

The Specifications and Bases for LCO 3.0.4 and SR 3.0.4 have been revised to reflect approved Generic Change BWR-26, C1. This change resulted in adding the phrase - LCO 3.0.4 (or 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. This change was determined to be acceptable after review of each of the PBAPS ITS. This review determined that the ACTIONS of the individual Specifications sufficiently define the remedial measures to be taken (i.e., the ACTIONS to be



2. LCO 3.0.4 and SR 3.0.4, pages 3.0-2, 3.0-5, B3.0-5, B3.0-6, B3.0-14, and B3.0-15 (continued)

entered require "Immediate" exit from the Applicability which is judged to preclude intentional entry into that Applicability regardless of the requirements of LCO 3.0.4 and SR 3.0.4, the ACTIONS permit continued operation in that Applicability, or the shutdown into the Applicability requires continuation of the shutdown). The review, done in accordance with BWR-26, did not identify any required changes to the individual Specifications in Sections 3.1 through 3.10. As a result, these changes do not represent a significant impact to safety.

Corresponding changes have also been made to the CTS markups for Specification 3.0 on pages 3 of 14 and 7 of 14 (Unit 2) and on pages 10 of 14 and 14 of 14 (Unit 3).

3. SR 3.1.3.5, Control Rod Coupling Verification, page 3.1-11

SR 3.1.3.5 states "Verify each control rod does not go to the withdrawn overtravel position, each time the control rod is withdrawn to the "full out" position and prior to declaring control rod OPERABLE after work on control rod or CRD System that could affect coupling." This has been revised to state "Verify each withdrawn control rod does not go to the withdrawn overtravel position, each time the control rod is withdrawn to the "full out" position and prior to declaring control rod OPERABLE after work on control rod or CRD System that could affect coupling." As stated in the Bases for SR 3.1.3.5, "The Surveillance requires verifying a control rod does not go to the withdrawn overtravel position." and "The verification is required to be performed any time a control rod is withdrawn to the "full out" position (notch position 48) or prior to declaring the control rod OPERABLE after work on the control rod or CRD System that could affect coupling (CRD changeout and blade replacement or complete cell disassembly, i.e., guide tube removal)." As a result, the word "withdrawn" is being added for clarification and consistency with the Frequencies specified in SR 3.1.3.5, the Bases of SR 3.1.3.5, and the method of performing the surveillance (the control rod must be withdrawn to perform the test) and does not change the intent of the Surveillance Requirement. The change is also being made to be consistent with SR 3.10.8.5, which is the same surveillance as SR 3.1.3.5 but includes the word "withdrawn."

## 4. Table 3.1.4-1, Control Rod Scram Times, page 3.1-14

The Control Rod Scram Time table is proposed to be revised to more completely reflect the deletion of the 0 psig scram time acceptance criteria from the table. The deletion of the 0 psig scram time acceptance criteria was approved in Generic Change BWR-13, C6, and Revision 3 to BWR-13, C6. Note (b) is proposed to be revised to state "When reactor steam dome pressure is < 800 psig, established scram time limits apply." The change to Note (b) is administrative in nature and does not change the intent of the Note. Note (c), which addresses acceptance criteria for testing at intermediate reactor steam dome pressures between 0 psig and 800 psig, is proposed to be deleted. With the deletion of the 0 psig scram time acceptance criteria, Note (c) is no longer required since, currently, the acceptance criteria for scram time testing at reactor steam dome pressures < 800 psig are adequately controlled by plant procedures. A minor format change is also being made to the heading of the scram time column of the table due to the deletion of the 0 psig scram time acceptance criteria. These changes are consistent with an Industry/NRC Generic Traveler to revise the BWR ITS NUREGs.

## 5. Table 3.3.2.1-1, Control Rod Block Instrumentation, Function 1.f, pages 3.3-18, 3.3-20, B3.3-52, B3.3-53, B3.3-54, and B3.3-55

The RBM Bypass Time Delay (Function 1.f) requires performance of a CHANNEL FUNCTIONAL TEST once per 92 days (SR 3.3.2.1.1) and a CHANNEL CALIBRATION once per 184 days (SR 3.3.2.1.5). Notes are proposed to be added for Function 1.f stating the CHANNEL FUNCTIONAL TEST and CHANNEL CALIBRATION are not required to be performed if the time delay circuit is disabled. The purpose of the RBM Bypass Time Delay Function is to allow the plant, when it is within thermal limits, to withdraw a control rod at least a single notch despite extremely noisy signals that would normally block rod withdrawal. Currently, the LPRM signals have not exhibited excessive noise characteristics that would necessitate use of this time delay. Since this time delay is not needed, the supporting analyses have not been performed and the allowed setting is zero. During the development of the procedures to implement SR 3.3.2.1.1 and SR 3.3.2.1.5 for Function 1.f, it was determined that the allowed setting (zero) is achieved by physically disabling the circuitry that enables the RBM Bypass Time Delay Function on the RBM Delay and Filter Card. As a result, the performance of a CHANNEL FUNCTIONAL TEST or a CHANNEL

5. Table 3.3.2.1-1, Control Rod Block Instrumentation, Function 1.f, pages 3.3-18, 3.3-20, B3.3-52, B3.3-53, B3.3-54, and B3.3-55 (continued)

CALIBRATION is not required to verify the OPERABILITY of Function 1.f when the time delay circuit is disabled. Corresponding changes have also been made to the Bases.

6. Table 3.3.5.1-1, ECCS Instrumentation, Functions 2.a and 2.b, page 3.3-40

Table 3.3.5.1-1 Note (b), which states "Also required to initiate the associated DG," has been deleted from the LPCI - Reactor Vessel Water Level - Low Low Low (Level 1) and Drywell Pressure - High Functions (Functions 2.a and 2.b). At Peach Bottom Atomic Power Station (PBAPS), the Diesel Generators (DGs) are initiated from the Core Spray (CS) System initiation logic. The CS and LPCI Reactor Vessel Water Level - Low Low Low (Level 1) and Drywell Pressure - Functions are derived from the same instrumentation. However, any inoperability of the LPCI Reactor Vessel Water Level - Low Low Low (Level 1) or Drywell Pressure - Function that could negatively impact DG initiation will also result in the CS Reactor Vessel Water Level - Low Low Low (Level 1) or Drywell Pressure - Function being inoperable. The CS Reactor Vessel Water Level - Low Low Low (Level 1) and Drywell Pressure - Functions will still include Note (b). Therefore, this change has no impact on DG initiation capability and is being made for consistency with the PBAPS design. Corresponding changes have also been made to the associated Bases.

7. Table 3.3.6.1-1, Primary Containment Isolation Instrumentation, Function 2.c, page 3.3-52

PBAPS Technical Specification Change Request 93-13 was submitted to reflect the upgrade of the Main Stack and Vent Stack Radiation Monitors. As a result of the upgrade to the Main Stack Radiation Monitor, the Allowable Value for Function 2.c (Primary Containment Isolation - Main Stack Monitor Radiation - High) of Table 3.3.6.1-1 has been revised from  $1 \times 10^6$  cps to  $2 \times 10^{-2}$   $\mu\text{Ci/cc}$ . The new Allowable Value for the Main Stack Radiation Monitors is documented in PECO Energy calculation PE-210 and was developed using the PECO Energy Instrument Setpoint Methodology.



8. Specification 3.3.6.2, Secondary Containment Isolation Instrumentation, pages 3.3-55 and B3.3-174

Required Action A.1 of Specification 3.3.6.2 specifies placing the inoperable channel in trip in 12 hours for Function 2 (Drywell Pressure-High) or in 24 hours for Functions other than Function 2. The 12 hour allowed outage time was determined to be acceptable for RPS channels in NEDC-30851P-A Supplement 2, "Technical Specifications Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," dated March 1989. Function 2 instrumentation of Specification 3.3.6.2 is common to RPS and as a result is provided with a 12 hour allowed outage time. Function 1 (Reactor Vessel Water Level-Low (Level 3)) instrumentation of Specification 3.3.6.2 is also common to RPS. Therefore, a 12 hour allowed outage time is appropriate for Function 1 and the Completion Times for Required Action A.1 of Specification 3.3.6.2 have been revised accordingly. The proposed change has no impact on safety since the Required Actions of Condition A of Specification 3.3.1.1, RPS Instrumentation, would require inoperable Reactor Vessel Water Level-Low (Level 3) Function instrumentation channels to be tripped in 12 hours. As a result, the change achieves consistency between the allowed outage times for instrumentation common to RPS, Primary Containment Isolation, and Secondary Containment Isolation. Corresponding changes have also been made to the associated Bases, Discussion of Change M<sub>2</sub> for ITS 3.3.6.2 (page 66), and 10 CFR50.92 evaluation M<sub>2</sub> for ITS 3.3.6.2 (page 35).

9. SR 3.7.2.2, Normal Heat Sink Temperature Verification, pages 3.7-4, B3.7-7, and B3.7-13

The PBAPS ITS submittal identified that the proposed temperature limit of 95°F was an open item. The submittal cover letter stated that calculations confirming the adequacy of the 95°F temperature limit were being completed. Due to resource constraints, it is not expected that all necessary confirmations will be completed in time to support NRC approval of the PBAPS ITS. As a result, the temperature limit/acceptance criteria has been revised to 90°F to be consistent with the current PBAPS design and analyses. Commensurate changes to the Bases have also been made. It is expected that upon completion of the necessary confirmations, a Technical Specification Change Request will be submitted requesting a change for the normal heat sink temperature from 90°F to 95°F. The necessary confirmations are expected to be completed by December 31, 1995.

10. Specification 5.5.3, Post Accident Sampling, page 5.0-8

The wording of IIS Specification 5.5.3 has been modified to more closely match the wording of existing Specification 6.19, Postaccident Sampling. The existing wording was approved in the NRC Safety Evaluation for PBAPS Amendments 113 and 117. The wording change is to help distinguish between the function of the Post-Accident Sampling System and the function of the main stack and reactor building vent sampling systems.

11. Specification 5.5.7, Ventilation Filter Test Program (VFTP), page 5.0-13

Specification 5.5.7.d demonstrates that the pressure drop across the filters and the charcoal filters is less than the specified pressure drop when tested at the specified system flow rate. Specification 5.5.7.d also referenced that the test would be performed in accordance with ASME N510-1989, Section 8.5.1. Section 8.5.1 of ASME N510-1989 is an airflow capacity test to assure that the maximum airflow rate can be achieved. As a result, the reference to ASME N510-1989, Section 8.5.1, has been deleted.

Specification 5.5.7.f which requires a sample of the charcoal filter to be analyzed once per year to assure halogen removal efficiency of at least 99.5%. This requirement is being deleted by PBAPS Technical Specification Change Request 95-02 dated 2/10/95 from G.A.Hunger, Jr. (PECO Energy) to NRC. As such, Specification 5.5.7.f is also proposed to be deleted to achieve consistency with the proposed CTS requirements for ventilation filter testing.

Corresponding changes have also been made to CTS markup for Specification 5.0 on page 39 of 86 (Unit 2) and on page 82 of 86 (Unit 3).

12. Specification 5.5.9, Diesel Fuel Oil Testing Program  
B 3.8.3, Bases for Diesel Fuel Oil, Lube Oil, and Starting Air, SR 3.8.3.3, pages 5.0-14 and B3.8-50

Specification 5.5.9.a which specifies new fuel oil requirements has been revised to allow for the verification of limits by the use of comparison to the supplier's certificate as approved in PBAPS Amendments 173 and 176 dated 4/23/93.

12. Specification 5.5.9, Diesel Fuel Oil Testing Program  
B 3.8.3, Bases for Diesel Fuel Oil, Lube Oil, and Starting  
Air, SR 3.8.3.3, pages 5.0-14 and B3.8-50 (continued)

In Specification 5.5.9.c, the words "in accordance with procedures based on applicable ASTM Standards" have been deleted since they are redundant to the wording in Specification 5.5.9

The Bases for SR 3.8.3.3 have also been revised to allow for the verification of new fuel oil limits by the use of comparison to the supplier's certificate as approved in PBAPS Amendments 173 and 176 dated 4/23/93. The revision also includes the acceptance criteria for the comparison.

Corresponding changes have also been made to CTS markup for Specification 5.0 on pages 41 of 86 and 42 of 86 (Unit 2) and on pages 84 of 86 and 85 of 86 (Unit 3).

13. B 3.8.4, Bases for DC Sources - Operating, SR 3.8.4.8, page B3.8-65

For the Battery Performance Test or Modified Test, the PBAPS Bases state the Frequencies are in accordance with IEEE-450, 1987. However, the Frequency "24 months when battery has reached 85% of the expected life with capacity  $\geq$  100% of the manufacturer's rating" is not in accordance with IEEE-450, 1987. The previous wording was approved in Generic Change WOG-14, C1, and was based on a draft version of IEEE-450. As a result, the Bases have been modified to discuss a more appropriate basis for this Frequency.

14. B 3.10.8, Bases for SDM Test - Refueling, SR 3.10.8.6, page B3.10-36

SR 3.10.8.6 requires CRD charging water header pressure to be verified once per 7 days. The Bases for SR 3.10.8.6 discuss minimum accumulator pressure being specified rather than minimum CRD charging water header pressure. This existing wording was approved in Generic Change BWR-18, C80. The Bases have been modified to reflect a more appropriate basis for the requirement.

15. APLHGR penalties for single recirculation loop operation and Main Turbine Bypass System inoperable, pages 3.4-1, 3.7-12, B3.2-1 through B3.2-7, B3.2-10, B3.4-3, B3.4-4, B3.4-5, B3.4-9, B3.7-25, B3.7-26, and B3.7-27

The ITS are being revised to include reference to new thermal limits curves contained in the Core Operating Limits Report (COLR), and specify the conditions for which the curves are to be used. This revision changes Specification 3.4.1, "Recirculation Loops Operating" and Specification 3.7.6, "Main Turbine Bypass System", and revises the discussions contained in B 3.2.1, Bases for Average Planar Linear Heat Generation Rate, and B 3.2.2, Bases for Minimum Critical Power Ratio. Corresponding changes are also proposed for the Bases of Specifications 3.4.1 and 3.7.6. The new thermal limits curves effectively require the application of APLHGR penalties (through the use of APLHGR limit multipliers) during single recirculation loop operation and when the Main Turbine Bypass System is inoperable. The ITS Bases are also being revised to include reference to the corresponding analyses which supports the new thermal limits curves. The changes to Specification 3.4.1 achieve consistency with the requirements of NUREG-1433 Specification 3.4.1, "Recirculation Loops Operating." The changes to Specification 3.7.6 are more restrictive than the requirements of NUREG-1433 Specification 3.7.7, "Main Turbine Bypass System," since the NUREG-1433 Specification 3.7.7 does not require application of APLHGR penalties when the Main Turbine Bypass System is inoperable. These changes are being made to achieve consistency with PBAPS safety analyses.

16. B 3.0, Bases for LCO and SR APPLICABILITY, pages B3.0-1 and B3.0-10

In the LCOs and the SRs section of the Bases, it is stated that LCO 3.0.1 through LCO 3.0.7 and SR 3.0.1 through SR 3.0.4 establish the general requirements applicable to all Specifications. However, LCO 3.0.1 through LCO 3.0.7 and SR 3.0.1 through SR 3.0.4 only establish the general requirements for the Specifications in Technical Specifications Sections 3.1 through 3.10. As a result, these Bases have been revised to reflect this clarification.

17. B 3.3.1.1, Bases for RPS Instrumentation, SR 3.3.1.1.7, page B3.3-31

SR 3.3.1.1.7 requires an adjustment of the APRM Flow Biased High Scram to conform to a flow signal once per 31 days. Minor wording changes are proposed to provide clarification and consistency with current surveillance practice at PBAPS.

18. B 3.3.5.1, ECCS Instrumentation, Function 2.e, page B3.3-105

The APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY section of the Bases describing the LPCI-Reactor Vessel Shroud Level-Level 0 states "An accompanying permissive from drywell pressure (Function 2.e, Drywell Pressure-High (RHR Valves)) is required for the suppression pool spray and drywell spray modes." This statement is proposed to be deleted from the Bases since the function, Drywell Pressure-High (RHR Valves), has been proposed to be relocated to a licensee-controlled document.

19. B 3.3.5.1, Bases for ECCS Instrumentation, Functions 4.f., 4.g., 5.f., and 5.g., page B3.3-115

The APPLICABLE SAFETY ANALYSES, LCO, and APPLICABILITY section of the Bases describing the required combination of Core Spray pumps indicating high discharge pressure necessary for generating an ADS permissive has been revised. This revision is being proposed for consistency with the plant design of these Functions as described in the BACKGROUND section of Bases B 3.3.5.1.

20. B 3.8.6, Bases for Battery Cell Parameters, Applicable Safety Analyses Section, page B3.8-68

Battery Cell Parameters support the operation of the DC electrical power subsystems and the Battery Cell Parameter Specification is required to be applicable during the same Modes and conditions as in Specification 3.8.4, "DC Sources-Operating," and Specification 3.8.5, "DC Sources-Shutdown". The same safety analyses discussions as those discussed in the Bases for Specification 3.8.4, "DC Sources-Operating," and Specification 3.8.5, "DC Sources-Shutdown" are also applicable to the Battery Cell Parameter Specification. As a result, the Bases for the Battery Cell Parameter Specification in the Applicable Safety Analyses Section have been revised accordingly.



21. B 3.10.7, Bases for Control Rod Testing - Operating, SR 3.10.7.1 and SR 3.10.7.2, pages B3.10-29 and B3.10-30

The Bases for SR 3.10.7.1 and SR 3.10.7.2 state that a Note is added to indicate that the Surveillances do not need to be performed if the other Surveillance (SR 3.10.7.1 or 3.10.7.2) is satisfied. The actual Note in the Technical Specifications states that the Surveillances do not need to be met if the other Surveillance is met (SR 3.10.7.1 or SR 3.10.7.2). Therefore, the Bases have been revised for consistency with the Technical Specifications.

22. Technical Specifications - Editorial Changes / Typographical Errors

Minor changes are proposed to the following Technical Specifications for consistency, clarity, or to correct typographical errors.

Specification 1.3, Example 1.3-6, page 1.3-11

Specification 1.4, Description, page 1.4-1 (Unit 3 only)

Specification 1.4, Example 1.4-3, page 1.4-5

Specification 3.1.3, Required Action A.1, page 3.1.7 (Unit 3 only)

Specification 3.1.5, Condition D, page 3.1-17

Specification 3.1.6, Required Action B.1 Note, page 3.1-19

Specification 3.3.1.1, SR 3.3.1.1.11, page 3.3-5 (Unit 2 only)

Table 3.3.1.1-1 (page 2 of 3), Function 11-Allowable Value, page 3.3-8

Table 3.3.3.1-1 (page 1 of 1), Footnote (c), page 3.3-25

Table 3.3.5.1-1 (page 1 of 5), Function 1.e-Applicable Modes Or Other Specified Conditions, page 3.3-39 (Unit 2 only)

Table 3.3.5.1-1 (page 2 of 5), Function 2.d-Applicable Modes Or Other Specified Conditions and Function 2.e, page 3.3-40 (Unit 2 only)

Table 3.3.6.1-1 (page 1 of 3), Function 1.d-Allowable Value, page 3.3-52

22. Technical Specifications - Editorial Changes / Typographical Errors (continued)

Table 3.3.6.1-1 (page 3 of 3), Function 6, page 3.3-54

Table 3.3.8.1-1 (page 1 of 1), Functions 4.a and 5.a-  
Allowable Values, page 3.3-64

Specification 3.4.9, Condition A, page 3.4-21

Specification 3.5.2, SR 3.5.2.5 Note, page 3.5-11

Specification 3.6.1.1, SR 3.6.1.1.1 and SR 3.6.1.1.2  
Frequency Notes, page 3.6-2

Specification 3.6.2.4, SR 3.6.2.4.2, page 3.6-30

Specification 3.6.3.1, SR 3.6.3.1.4, page 3.6-32

Specification 3.8.1, SR 3.8.1.8 Note, pages 3.8-8

Specification 3.8.1, SR 3.8.1.18 Note, page 3.8-16

Specification 3.8.2, LCO 3.8.2.d, page 3.8-19 (Unit 3 only)

Specification 3.8.4, SR 3.8.4.8 Frequencies, page 3.8-31

Specification 3.9.4, Required Action A.1.1, page 3.9-6

23. Bases - Editorial Changes / Typographical Errors

Minor changes are proposed to the following Technical  
Specifications Bases for consistency, clarity, or to correct  
typographical errors.

B 3.0, Bases for LCO 3.0.6, page B3.0-8

B 3.0, Bases for SR 3.0.1, page B3.0-11

B 3.0, Bases for SR 3.0.3, Page B3.0-13

B 3.3.3.2, Table B 3.3.3.2-1 (page 1 of 3), (page 2 of 3),  
and (page 3 of 3), pages B3.3-80, 81, and 82

B 3.3.5.1, Bases for ECCS Instrumentation, Background  
Section for Diesel Generators, page B3.3-98

23. Bases - Editorial Changes / Typographical Errors (continued)

B 3.3.5.1, Bases for ECCS Instrumentation, Applicable Safety Analyses, LCO, and Applicability Section for Function 3.f., page B3.3-110

B 3.3.8.1, Bases for LOP Instrumentation, Applicable Safety Analyses, LCO, and Applicability Section, page B3.3-188 (Unit 3 only)

B 3.5.1, Bases for ECCS-Operating, Actions Section for C.1 and C.2, page B3.5-7

B 3.6.1.3, Bases for PCIVs, Surveillance Requirements Section for SR 3.6.1.3.5, page B3.6-25

B 3.8.1, Bases for AC Sources-Operating, Surveillance Requirements Section for SR 3.8.1.8, page B3.8-22

B 3.8.1, Bases for AC Sources-Operating, Surveillance Requirements Section for SR 3.8.1.18, page B3.8-32

B 3.9.2, Bases for Refuel Position One-Rod-Out Interlock, Surveillance Requirements, SR 3.9.2.2, page B3.9-7

B 3.9.6, Bases for RPV Water Level, Applicability Section, page B3.9-18

B 3.10.4, Bases for Single Control Rod Withdrawal-Cold Shutdown, LCO Section, page B3.10-15 (Unit 2 only)

B 3.10.4, Bases for Single Control Rod Withdrawal-Cold Shutdown, Actions Section, page B3.10-16

B 3.10.5, Bases for Single CRD Removal-Refueling, Applicable Safety Analyses Section, page B3.10-20

B 3.10.6, Bases for Multiple Control Rod Withdrawal-Refueling, Actions Sections, page B3.10-26

B 3.10.8, Bases for SDM Test-Refueling, Actions Section for A.1, pages B3.10-33 and 34

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24. Discussion of Changes, CTS Markups, and 10CFR50.92 Evaluations - Editorial Changes / Typographical Errors

Minor changes are proposed to the following Discussion for Changes and CTS Markups for consistency or to correct editorial or typographical errors. Corresponding changes to the 10CFR50.92 evaluations have also been made, as appropriate.

CTS Markup for ITS 3.3.5.1, ADS-LPCI or CS Pump Disch. Pressure Interlocks, Instrument Functional Test annotation, page 33 of 36 (Unit 3 only)

Discussion of Change M<sub>1</sub> for ITS 3.6.1.4, page 17, and 10CFR50.92 evaluation M<sub>1</sub> for ITS 3.6.1.4, page 22

Discussion of Change M<sub>1</sub> for ITS 3.6.2.2, pages 29 and 30, and 10CFR50.92 evaluation M<sub>1</sub> for ITS 3.6.2.2, page 25

CTS Markup for ITS 3.7.3, LCO and Applicability annotation, pages 1 of 2 and 2 of 2

Discussion of Change R<sub>2</sub> for ITS 3.7.7, page 19, and 10CFR50.92 evaluation R<sub>2</sub> for ITS 3.7.7, page 15

Discussion of Change M<sub>8</sub> for ITS 3.8.1, page 4, and 10CFR50.92 evaluation M<sub>8</sub> for ITS 3.8.1, page 9

Discussion of Change M<sub>1</sub> for ITS 3.9.3, page 7, and 10CFR50.92 evaluation M<sub>1</sub> for ITS 3.9.3, page 7

Discussion of Change M<sub>6</sub> for ITS 5.0, page 5

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INSERT AND REMOVAL INSTRUCTIONS

The following instructions are provided for use in updating the PBAPS ITS submittal (TSCR 93-16) to reflect the changed pages of Revision A. To facilitate the update process, the instructions have been divided by PBAPS ITS submittal volume number.

VOLUME 1 APPLICATION OF SCREENING CRITERIA

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B 3.8-32  
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VOLUME 5 UNIT 2 TECHNICAL SPECIFICATIONS BASES (3.4 - 3.10) (CONTINUED)

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VOLUME 6 UNIT 3 TECHNICAL SPECIFICATIONS BASES (2.0 - 3.3)

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B 3.0-13 thru B 3.0-15  
B 3.2-1 thru B 3.2-7  
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B 3.7-13  
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**VOLUME 8 CURRENT TECHNICAL SPECIFICATIONS COMPARISON DOCUMENT (1.0 - 3.3.5.2)**

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ITS 3.6.2.2 DOC page 30

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ITS 3.6.1.4 DOC page 17  
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ITS 3.6.2.2 DOC page 30

**VOLUME 10 CURRENT TECHNICAL SPECIFICATIONS COMPARISON  
DOCUMENT (3.7 - APPENDIX B)**

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Spec. 3.7.3 Markup page 2 of 2  
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**VOLUME 11 NO SIGNIFICANT HAZARDS CONSIDERATION (1.0 - 3.5)**

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Considerations (NSHCs)  
Section 3.3 page 35

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No Significant Hazards  
Considerations (NSHCs)  
Section 3.3 page 35



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**VOLUME 12 NO SIGNIFICANT HAZARDS CONSIDERATION (3.6 -  
APPENDIX B)**

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NSHCs Section 3.6 page 25  
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**VOLUME 13 DEVIATIONS FROM NUREG-1433 (TECHNICAL  
SPECIFICATIONS)**

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Markup 3.1-17  
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Spec. 3.3.1.1 Insert  
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Markup 3.1-19  
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 Spec. 3.8.2 Insert  
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 Markup 3.8-27  
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 Bases 3.0 Insert B14  
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B 3.3.3.2 (6 pages)  
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B3.3.2.1.5 (behind

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Markup B 3.4-3

Bases 3.4 Insert ASA

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Bases 3.4 Insert SR

(behind Insert ACTIONS2)

Markup B 3.4-6

Markup B 3.5-7

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Insert Bases 3.7.3

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Bases Section 3.7 DOC

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Bases 3.8 Insert

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Markup B 3.3-20)

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Markup B 3.4-3

Bases 3.4 Insert ASA

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Bases 3.4 Insert SR

(behind Insert ACTIONS2)

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Markup B 3.5-7

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Markup B 3.7-33 thru -35

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Bases 3.8 Insert

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3.10) (CONTINUED)

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 Markup B 3.9-7  
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 Markup B 3.10-27  
 Markup B 3.10-30  
 Markup B 3.10-31  
 Markup B 3.10-34  
 Bases 3.10 Insert  
 B35A (behind Markup  
 B 3.10-35)  
 Bases 3.10 Inserts  
 1 and 2 (behind  
 Insert B35A)  
 Bases Section 3.10 DOC  
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 Markup B 3.10-34  
 Bases 3.10 Insert  
 B35A (behind Markup  
 B 3.10-35)  
 Bases 3.10 Inserts  
 1 and 2 (behind  
 Insert B35A)  
 Bases Section 3.10 DOC  
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