



ENTERGY

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MICHAEL B. SELLMAN

General Manager
Plant Operations

October 24, 1995

U. S. Nuclear Regulatory Commission
Document Control Desk
Mail Station P1-37
Washington, DC 20555

Subject: River Bend Station - Unit 1
Docket No. 50-458
License No. NPF-47
License Amendment Request (LAR) 95-21, Change to Technical Specifications
3.6.1.1 through 3.6.1.3, "Containment Systems"

File Nos.: G9.5, G9.42

RBEXEC-95-151
RBF1-95-0250
RBG-42084

Gentlemen:

In accordance with 10CFR50.90, Entergy Operations, Inc. (EOI) hereby applies for amendment of Facility Operating License No. NPF-47, Appendix A - Technical Specifications, for River Bend Station (RBS). This request consists of a proposed change to Technical Specifications 3.6.1.1 through 3.6.1.3, "Containment Systems." This request is submitted in accordance with the requirements of 10CFR50, Appendix J, Option B, and is also provided as notification of EOI's intent to implement a performance-based containment leak rate testing program at RBS. In accordance with the rule, Regulatory Guide 1.163, "Primary Containment Leakage Rate Testing Program" (September 1995), is being included in the RBS Technical Specifications by general reference.

Attachment 2 provides a description of the proposed changes and the associated justification (including a Basis For No Significant Hazards Consideration). A marked-up copy of the affected pages from the RBS Technical Specifications (ITS) is provided in Attachment 3. Included in the mark-ups, for information, is a copy of the marked-up Technical Specification Bases. Further, an affidavit supporting the facts set forth in this letter and its attachments is

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provided in Attachment 1. RBS is aware of the industry-wide initiative, led by the Nuclear Energy Institute (NEI), to provide the NRC staff with a proposed set of Technical Specifications for generic industry implementation of 10 CFR 50 Appendix J, Option B. However, due to the close proximity of the next refueling outage (January 6, 1996), RBS cannot afford to wait until these generic Technical Specification changes are issued. Since implementation of the Appendix J, Option B, rule presents a substantial cost savings to RBS (expected to be in excess of \$2M for RF-6), it is necessary to request approval for the proposed Technical Specification changes contained in Attachment 3.

The Technical Specification changes proposed herein meet the requirements for Appendix J, Option B and are acceptable for proper implementation of the rule. However, if the Technical Specification changes eventually agreed upon by both the staff and NEI are substantially different from those implemented within this submittal, RBS may wish to again change its Technical Specifications to assure long-term Standard Technical Specification consistency. Additionally, any exceptions to Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program," or NEI 94-01, Revision 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR Part 50, Appendix J," will be proposed by written letter to the office of Nuclear Reactor Regulation (NRR) pursuant to the requirements in 10 CFR 50.4. These exceptions will not be processed in accordance with the regulatory requirements contained within 10 CFR 50.90 and 10 CFR 50.91. Exceptions to ANSI/ANS 56.8-1994 will be administered under the RBS 10 CFR 50.59 process.

Based upon the refueling outage safety improvement and significant resource savings that can be realized by implementing this proposed change, EOI is requesting that this application be reviewed on a schedule sufficient to support RF-6 which is currently scheduled to begin January 6, 1996. As an alternative, if additional review time is required by the staff, EOI requests that those components meeting the performance-based criteria of the RBS "Primary Containment Leakage Rate Testing Program" be deferred from RF-6. The scheduled implementation date for this program is December 15, 1995. This request for deferral meets the criteria of 10 CFR 50.12(a)(1) and (a)(2)(iii) regarding special exemptions. If not granted, EOI must perform testing required under the current testing program. Such testing will result in an extension of the outage causing undue hardship and additional outage-related costs. Finally, EOI requested (in part) an exemption from performance of the Type A test for RF-6 in a letter dated May 30, 1995. If the Technical Specification change to implement Option B of

License Amendment Request (LAR) 95-21

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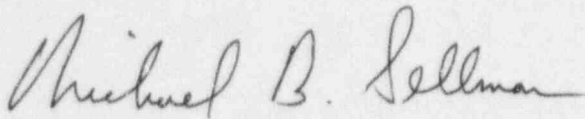
RBG-42084

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Appendix J cannot be approved in time to support the outage, EOI requests approval of the previously docketed ILRT exemption request.

This request has been discussed with the NRR project manager for RBS. It has also been reviewed and approved by the RBS Facility Review Committee and the Nuclear Review Board. If you have any questions regarding this request or require additional information, please contact Mr. R. C. Daley at (504) 381-3771.

Sincerely,

A handwritten signature in cursive script, reading "Michael B. Sellman". The signature is written in dark ink and is positioned below the word "Sincerely,".

MBS/rcd
attachments

cc: Mr. David L. Wigginton
U. S. Nuclear Regulatory Commission
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Rockville, MD 20852

NRC Resident Inspector
P. O. Box 1051
St. Francisville, LA 70775

U. S. Nuclear Regulatory Commission
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611 Ryan Plaza Drive, Suite 400
Arlington, TX 70611

Department of Environmental Quality
Radiation Protection Division
P.O. Box 82135
Baton Rouge, LA 70884-2135
Attn.: Administrator

BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

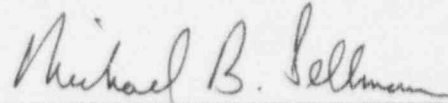
LICENSE NO. NPF-47

DOCKET NO. 50-458

IN THE MATTER OF
GULF STATES UTILITIES COMPANY
CAJUN ELECTRIC POWER COOPERATIVE AND
ENTERGY OPERATIONS, INC.

AFFIRMATION

I, Michael B. Sellman, state that I am General Manager - Plant Operations of Entergy Operations, Inc. at River Bend Station; that on behalf of Entergy Operations, Inc., I am authorized by Entergy Operations, Inc., to sign and file with the Nuclear Regulatory Commission, this River Bend Station License Amendment Request (LAR) 95-21, Change to Technical Specifications 3.6.1.1 through 3.6.1.3, "Containment Systems;" that I signed this letter as General Manager - Plant Operations at River Bend Station of Entergy Operations, Inc.; and that the statements made and the matters set forth therein are true and correct to the best of my knowledge, information, and belief.

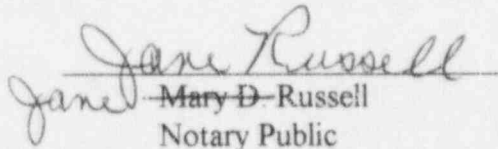


Michael B. Sellman

STATE OF LOUISIANA
PARISH OF WEST FELICIANA

SUBSCRIBED AND SWORN TO before me, a Notary Public, commissioned in the Parish above named, this 24th day of October, 1995.

(SEAL)


Mary D. Russell
Notary Public

My Commission expires with life.

ENTERGY OPERATIONS, INC.
RIVER BEND STATION
DOCKET 50-458/LICENSE NO. NPF-47
LICENSE AMENDMENT REQUEST 95-21
(TS 3.6.1.1 through 3.6.1.3, "Containment Systems")

1.0 Licensing Document Involved

This proposed change affects the following Technical Specification sections:

1.1	Definitions
3.6.1.1	Primary Containment - Operating
B 3.6.1.1	Bases - Primary Containment - Operating
3.6.1.2	Primary Containment Air Locks
B 3.6.1.2	Bases - Primary Containment Air Locks
3.6.1.3	Primary Containment Isolation Valves (PCIVs)
B 3.6.1.3	Bases - Primary Containment Isolation Valves (PCIVs)
5.5	Programs and Manuals

2.0 Background

The containment leakage rate testing program includes the performance of an Integrated Leakage Rate Test (ILRT), or Type A test, and Local Leakage Rate Tests (LLRTs), or Type B and C tests. Type A tests measure the overall leakage rate of the primary reactor containment, while Type B tests detect leakage paths and measure leakage for certain primary containment penetrations and Type C tests measure containment isolation valve leakage rates. 10 CFR 50 Appendix J contains the associated requirements for the above mentioned types of leakage rate testing.

The Appendix J testing requirements ensure that leakage through the primary containment and systems and components penetrating primary containment does not exceed allowable leakage rate values as specified in the technical specifications or associated bases. Compliance with the Appendix J testing requirements ensures that the primary containment configuration is structurally sound and will limit leakage to those leakage rates assumed in the safety analysis. These requirements also ensure that an adequate primary containment boundary is maintained during and after an accident by minimizing potential leakage paths to the environment thereby assuring that the primary containment function assumed in the safety analysis will be maintained.

On February 4, 1992, the NRC published a notice in the Federal Register presenting the planned actions of its initiative to institute a continuing effort to eliminate requirements that are marginal to safety and yet impose significant regulatory burdens on licensees. The NRC concluded that decreasing the prescriptiveness of some regulations may improve their effectiveness by providing flexibility to licensees to implement cost-effective safety measures. It was determined that the detailed and prescriptive technical requirements contained in some regulations could be improved and replaced with performance-based requirements and supporting regulatory guides.

In accordance with the above conclusions and the prescriptive nature of 10 CFR 50 Appendix J, the NRC indicated that potential modifications to Appendix J could be considered. To support a change to Appendix J, analytical efforts were used to show the effects on risk due to extending test intervals. These efforts are documented in NUREG-1493, "Performance-Based Containment Leakage Test Program." Based on the technical findings in NUREG-1493, the NRC concluded that:

- Testing intervals for Types A, B, and C tests can be increased with only a marginal impact on safety and should produce significant savings in future industry testing costs.
- Testing intervals for local leak-rate tests (Type B and C) can be established based on the experience history of each component.

Based upon these findings, the NRC issued Regulatory Guide 1.163, "Performance-Based Containment Leak-Test Program." The purpose of this Regulatory Guide was to provide a performance-based option, Option B, for leakage-rate testing of containments of light-water-cooled nuclear power plants. Licensees were allowed to voluntarily comply with Option B as an alternative to compliance with the current requirements of 10 CFR 50, Appendix J.

3.0 Description of Proposed Change

Based upon the aforementioned and in accordance with 10CFR50.90, Entergy Operations, Inc. (EOI) proposes to change TS 3.6.1.1 through 3.6.1.3, "Containment Systems," to allow for implementation of Option B to 10 CFR 50 Appendix J in accordance with Regulatory Guide 1.163. The Regulatory Guide endorses the performance-based methods contained within NEI 94-01, Revision 0, "Industry Guideline for Implementing Performance-Based Option of 10 CFR 50 Appendix J." In addition, for implementation the Commission has required that Regulatory Guide 1.163 be included, by general reference, in the plant technical specifications. Attachment 3 contains marked-up technical specification pages which reflect this change and other changes necessary for implementation of this performance-based option. The proposed change will essentially provide for the following:

3.1 Type A Testing

Type A tests shall be performed on a 10-year interval after two previous consecutive Type A tests, performed on the test interval specified in Appendix J (three tests, at approximately equal intervals, in a 10-year period), have been successful. The elapsed time between the first and last test in a series of consecutive passing tests used to determine performance shall be at least 24 months.

If a Type A test is failed and the failure is not due to a Type B or C component, acceptable performance shall be reestablished by performing a Type A test within 48 months of the unsuccessful Type A test. Following a successful Type A test, the surveillance frequency may be returned to once per 10 years. If a Type A test failure is caused by failure(s) of a Type B or C component, the corrective action for Type B and C failures would apply as stated in Section 3.2. RBS Type A or Integrated Leak Rate Test (ILRT) data satisfy these criteria. In addition, the primary containment leakage rate acceptance criteria for operability remains at an overall leakage limit of $\leq 1.0 \text{ La}$.

In addition, general inspections of the accessible interior and exterior surfaces of the containment structures should be conducted prior to initiating a Type A test, and during two other refueling outages before the next Type A test if the interval for the Type A test has extended to 10 years, in order to allow for early uncovering of evidence of structural deterioration.

3.2 Type B and C Testing

Extensions in Type B and C test intervals are allowed based upon completion of two consecutive successful periodic As-found tests. Type B tests (with the exception of airlocks) may be increased to a maximum interval of 10 years. Type C tests may be increased to a maximum interval of 5 years. If a Type B or C test is not successful, the test frequencies will be set at the initial test intervals.

Airlock testing has been increased to an interval of once per 30 months. When containment is required, airlock door seals should be tested within 7 days after each containment access. For periods of multiple containment entries where the airlock doors are routinely used for access more frequently than once every 7 days, door seals may be tested once per 30 days.

In addition, acceptance criteria for hydrostatically tested lines, secondary bypass, Main Steam Isolation Valves (MSIVs), and feedwater isolation valves will also be performance-based and in accordance with Regulatory Guide 1.163. The interval for MSIVs and feedwater isolation valves will be limited to 30 months in accordance with Regulatory Guide 1.163.

Performance factors that should be considered prior to extending intervals are as follows:

- a) Past Component Performance - Leakage rate testing intervals should not be extended until plant-specific component performance of two successful consecutive As-found tests are performed.
- b) Service - Environment and use of components.
- c) Design - Valve type and penetration design.
- d) Safety Impact - Potential impact of penetration failure in limiting releases from the containment under accident conditions.
- e) Cause Determination - Common-mode failure mechanisms.

3.3 General

Test intervals will be established by reviewing Type B and C test data and determining if the Type B or C tests for each component had passed or failed. A failure is a Type B or C test that exceeded the owner's allowable leakage rate. The test interval assignments and all supporting evaluations will be documented in plant records. If it is determined that a component will remain on a two-year interval regardless of its historical performance, interval establishment is not required. The allowable leakage rates are assigned to each Type B and C component. The allowable leakage rate assigned to each component is the administrative leakage rate limit and is specified to be indicative of the potential onset of component degradation. All allowable leakage rate assignments are documented. These LLRT acceptance criteria are established in a conservative manner. In setting these limits, credit is not taken for the effects of multiple penetration barriers in further reducing overall leakage through the penetration. Therefore, the acceptance criteria for the Type B and C tests remain at very low values.

The owner's allowable leakage rate assigned to each component is conservative and was chosen to signal the possible onset of component degradation. Assignment of allowable leakage rates proportional to the size of the valve was chosen to be small enough to signal that the valve leakage tightness is beginning to degrade. This provides a rational method for assigning leakage rate values and is conservative when compared to other plants surveyed in the industry. Because of this conservatism in the owner's allowable leakage rate calculation, a failure of the allowable leakage rate or administrative limit is not a failure of the Technical Specification requirement.

4.0 Justification for Proposed Change

The proposed program, based upon performance criteria, is justifiable due to the following:

- The overall performance goal of ensuring containment isolation with a high degree of reliability can be demonstrated based upon continued good performance of most containment penetrations.
- Qualitative performance factors are considered in establishing performance criteria. These factors consider past performance, component design, component service, safety impact and cause determination.
- Quantitative acceptance criteria for testing continue to be set in a conservative manner.
- Quantitative criteria for testing intervals are based on demonstrated component performance and the achievement of the overall performance goal.

No change in the method of testing is being proposed. The tests will continue to be done at full pressure (P_a) or greater. The test pressure for primary containment isolation valves will continue to be applied in the same direction as would be required for the valve to perform its safety function (unless a different direction can be shown to be equivalent or more conservative). The Type A test or ILRT will continue to be performed at full pressure (P_a). Other programs are in place to ensure that proper maintenance and repairs are performed during the service life of the primary containment and systems and components penetrating the primary containment. The program establishes a rational basis for containment isolation testing, consistent with preserving an adequate level of safety. All testing remains in accordance with the requirements discussed in USAR Section 6.2.6.

5.0 Historical Surveillance Results

The proposed change employs a performance-based approach in establishing the Type B and C test frequency. The changes to component test frequency are based upon excellent performance as demonstrated over the past approximately ten years of plant operation as stated in Section 2.0 and are justified within the RBS Primary Containment Leakage Rate Testing Program. Future test results will then be used to provide the basis for continuing on the same schedule or increasing the frequency if a test failure occurs. Resumption of the performance-based schedule would be allowed only after two subsequent consecutive tests have proven acceptable performance.

6.0 Proposed Technical Specification Changes

The following are the specific changes to the Technical Specifications which are requested:

- 1) The definition of L_a has been relocated to Section 5.5.13, the Primary Containment Leakage Rate Testing Program. The definition for P_a has been added to the same section. This change is in accordance with SECY-95-181, "Final Amendment to 10 CFR 50, Appendix J, 'Containment Leakage Testing,' to Adopt Performance Oriented and Risk Based Approaches."
- 2) The "Primary Containment Leakage Rate Testing Program" has been established and added to Section 5.5, Programs and Manuals, of the Technical Specifications. This program contains the necessary requirements for implementation of 10 CFR 50 Appendix J, Option B. Reference to Regulatory Guide 1.163 is made in this definition of the requirements for this program. This new section is numbered Section 5.5.13.
- 3) The frequency requirements for Surveillance Requirements (SRs) 3.6.1.1.1, 3.6.1.2.1, 3.6.1.3.9, 3.6.1.3.10, 3.6.1.3.11, and 3.6.1.3.12 have been changed so that they are now in accordance with the Primary Containment Leakage Rate Testing Program. This change is administrative in nature. The requirements of Appendix J, Option B are contained within the Primary Containment Leakage Rate Testing Program.
- 4) The note in the frequency requirements for SRs 3.6.1.1.1, 3.6.1.2.1, 3.6.1.3.9, 3.6.1.3.10, 3.6.1.3.11, and 3.6.1.3.12 has been relocated to Section 5.5.13, Primary Containment Leakage Rate Testing Program. This change is administrative in nature and is proposed for the purposes of consistency and clarity.
- 5) A statement confirming the applicability of SR 3.0.3 in the case of the Primary Containment Leakage Rate Testing Program is added to Section 5.5.13. This change is administrative in nature and is proposed for the purpose of clarity.
- 6) The leakage rate acceptance criteria in SR 3.6.1.1.1 are relocated to Section 5.5.13, the Primary Containment Leakage Rate Testing Program, and replaced by the requirement to perform testing in accordance with the Primary Containment Leakage Rate Testing Program. This change is consistent with the requirements in Appendix J, Option B.
- 7) The wording in SR 3.6.1.2.1 and in Note 2 of the same SR is changed so that testing is performed in accordance with the Primary Containment Leakage Rate Testing Program. This change is administrative in nature and consistent with the requirements as set forth in 10 CFR 50 Appendix J, Option B.

7.0 No Significant Hazard Considerations

Entergy Operations Inc. (EOI) proposes to change the current River Bend Station (RBS) Technical Specifications to allow the time interval for performance of Type B and C testing to be performance-based. The testing would be performed more frequently if component leakage degrades. In accordance with 10CFR50.92, a proposed change to the operating license (Technical Specifications) involves no "significant hazards consideration" if operation of the facility, in accordance with the proposed change, would not (1) involve a significant increase in the probability or consequences of any accident previously evaluated, (2) create the possibility of a new or different kind of accident from previously evaluated, or (3) involve a significant reduction in a margin of safety. This request is evaluated against each of these criteria as follows:

- (1) This request does not involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change does not involve a change to the plant design or operation. As a result, the proposed change does not affect any of the parameters or conditions that contribute to initiation of any accidents previously evaluated. Thus, the proposed change cannot increase the probability of any accident previously evaluated.

The proposed change potentially affects the leak-tight integrity of the containment structure designed to mitigate the consequences of a loss-of-coolant accident (LOCA). The function of the containment is to maintain functional integrity during and following the peak transient pressures and temperatures which result from any loss-of-coolant accident (LOCA). The containment is designed to limit fission product leakage following the design basis LOCA. Because the proposed change does not alter the plant design, only the frequency of measuring Type B and C leakage, the proposed change does not directly result in an increase in containment leakage. However, decreasing the test frequency can increase the probability that a large increase in containment leakage could go undetected for an extended period of time. Based upon the results of the periodic containment Type A or Integrated Leak Rate Tests (ILRTs) and Type B and C or Local Leak Rate Tests (LLRTs) surveillance tests, this is not expected during the remaining life of the plant. The risk resulting from the proposed changes is as follows:

Type A Testing

NUREG/CR-4330 (NRC86) found that the effect of containment leakage on overall accident risk is small since risk is dominated by accident sequences that result in failure or bypass of the containment. It also determined that on an expected individual dose basis, the effect of containment leakage is small.

Industry wide, ILRTs have only found a small fraction of the leaks that exceed current acceptance criteria. Only three percent of all leaks are detected by ILRTs, and therefore, by extending Type A testing intervals, only three percent of all leaks have a potential for remaining undetected for longer periods of time. In addition, when leakage has been detected by ILRTs, the leakage rate has been only about two times the allowable leakage rate.

NUREG-1493 found that these observations, together with the insensitivity of reactor accident risk to the containment leakage rate, show that reducing the Type A leakage test frequency would have a minimal impact on public risk.

Type B and C Testing

NUREG-1493 found that while Type B and C tests can identify the vast majority (greater than 95 percent) of all potential leakage paths, performance-based alternatives to current local leakage-testing requirements are feasible without significant risk impacts. The risk model used in NUREG-1493 suggests that the number of components tested would be reduced by about 60 percent with less than a three-fold increase in the incremental risk due to containment leakage. Since, under existing requirements, leakage contributes less than 0.1 percent of overall accident risk, the overall impact is very small. NUREG-1493 found that while the extended testing intervals for Type B and C tests led to minor increases in potential offsite dose consequences, the actual increase in on-site (worker) doses exceeded (by at least an order of magnitude) the potential off-site dose consequences.

EPRI Research Project Report TR-104285, "Risk Impact Assessment of Revised Containment Leak Rate Testing Intervals," also concluded that a relaxation of the test intervals for Type B and C penetrations results in a negligible increase in total plant risk.

Based on the above, EOI has concluded that the proposed change will not result in a significant increase in the probability or consequences of any accident previously evaluated.

- (2) The request does not create the possibility of occurrence of a new or different kind of accident from any accident previously evaluated.

The proposed change does not involve a change to the plant design or operation. As a result, the proposed change does not affect any of the parameters or conditions that could contribute to initiation of any accidents. This change involves the reduction in Type A, B,

and C test frequency. The methods of performing the tests are not changed. No new accident modes are created by extending the testing intervals. No safety-related equipment or safety functions are altered as a result of this change. Extending the test frequency has no influence on, nor does it contribute to, the possibility of a new or different kind of accident or malfunction from those previously analyzed.

Based upon the above, EOI has concluded that the proposed change will not create the possibility of a new or different kind of accident previously evaluated.

- (3) The request does not involve a significant reduction in a margin to safety.

The proposed change only affects the frequency of Type A, B, and C testing and does not change the methodology for performance of the testing. However, the proposed change can increase the probability that a large increase in leakage could go undetected for an extended period of time. Operational experience has shown that the leak tightness of the containment has been maintained significantly below the allowable leakage limit. In addition, NUREG-1493 has determined that, under several different accident scenarios, the risk of radioactivity release from containment is negligible with the implementation of these proposed changes.

The margin of safety that has the potential of being impacted by the proposed change involves the offsite dose consequences of postulated accidents which are directly related to containment leakage rate. The containment isolation system is designed to limit leakage to L_a which is defined by the RBS Technical Specifications to be 0.26 percent by weight of the containment air per 24 hours at 7.6 psig (P_a). The limitation on containment leakage rate is designed to ensure that total leakage volume will not exceed the value assumed in the accident analyses at the peak accident pressure (P_a) or 7.6 psig. The margin to safety for the offsite dose consequences of postulated accidents directly related to the containment leakage rate is maintained by meeting the 1.0 L_a acceptance criteria.

No change in the method of testing is being proposed. The Type B and C tests will continue to be done at full pressure (P_a) or greater. Other programs are in place to ensure that proper maintenance and repairs are performed during the service life of the primary containment and systems and components penetrating the primary containment.

As a result, EOI has concluded that the proposed change will not result in a significant reduction in the margin of safety.

Based on the foregoing, EOI concludes that this request does not involve a "significant hazards consideration."

8.0 Environmental Impact Consideration

EOI has reviewed this request against the criteria of 10CFR51.22 for environmental considerations. This regulation allows for a categorical exclusion provided that (i) the amendment involves no significant hazards consideration, (ii) there is no significant change in the amounts of any effluents that may be released offsite, and (iii) there is no significant increase in individual or cumulative occupational radiation exposure.

This request has been determined by EOI not to involve a significant hazards consideration. The change will continue to allow for timely and accurate determination of the radiological plant effluents and will not affect the amounts or types of effluents since this change only concerns testing frequency. The requested change would reduce the testing frequency only and, consequently, would not increase the individual or cumulative occupational radiation exposure.

EOI concludes that the proposed change meets the criteria given in 10CFR51.22 (c)(9) for a categorical exclusion from the requirement for an environmental impact statement.

9.0 Schedule for Attaining Compliance

Based upon the refueling outage safety improvement and significant resource savings that can be realized by implementing this proposed change, EOI is requesting that this application be reviewed on a schedule sufficient to support the sixth refueling outage (RF-6) currently scheduled to begin January 6, 1996. As an alternative, if additional review time is required by the staff, EOI requests that those components meeting the performance-based criteria of the RBS "Primary Containment Leakage Rate Testing Program" be deferred from RF-6. The scheduled implementation date for this program is December 15, 1995. This request for deferral meets the criteria of 10 CFR 50.12(a)(1) and (a)(2)(iii) regarding special exemptions. If not granted, EOI must perform testing required under the current testing program. Such testing will result in an extension of the outage causing undue hardship and additional outage-related costs. Finally, EOI requested (in part) an exemption from performance of the Type A test for RF-6 in a letter dated May 30, 1995. If the Technical Specification change to implement Option B of Appendix J cannot be approved in time to support the outage, EOI requests approval of the previously docketed ILRT exemption request.

10.0 Notification of State Personnel

A copy of this amendment request has been provided to the State of Louisiana, Department of Environmental Quality - Radiation Protection Division.

RBEXEC-95-151

RBF1-95-0250

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Attachment 3

PROPOSED IMPROVED STANDARD TECHNICAL SPECIFICATION CHANGES