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June 1, 2021

10 CFR 50.90

U.S. Nuclear Regulatory Commission
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Watts Bar Nuclear Plant, Units 1 and 2
Facility Operating Licenses Nos. NPF-90 and NPF-96
NRC Docket Nos. 50-390 and 50-391

Subject: Application to Revise the Measurement Units for the Watts Bar Nuclear Plant, Unit 1 and Unit 2 Technical Specifications for the Containment Vent Isolation Instrumentation and Control Room Emergency Ventilation System Radiation Monitors (WBN-TS-19-25)

In accordance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.90, "Application for amendment of license, construction permit, or early site permit," Tennessee Valley Authority (TVA) is submitting a request for an amendment to Facility Operating License Nos. NPF-90 and NPF-96 for the Watts Bar Nuclear Plant (WBN), Units 1 and 2, respectively.

This request is to revise WBN Units 1 and 2 Technical Specification (TS) 3.3.6, "Containment Vent Isolation Instrumentation" and TS 3.3.7, "Control Room Emergency Ventilation System (CREVS) Actuation Instrumentation," to delete a redundant unit of measure associated with the trip setpoint of TS Table 3.3.6-1, Function 3, "Containment Purge Exhaust Radiation Monitors" and TS Table 3.3.7-1, Function 2, "Control Room Radiation Control Room Air Intakes". The existing TS Tables 3.3.6-1 and 3.3.7-1 contain two equivalent units of measure for the allowable value (AV). The AVs in TS Tables 3.3.6-1 and 3.3.7-1 are described in microcuries per cubic centimeter ($\mu\text{Ci/cc}$) and the equivalent counts per minute (cpm). This change is requested to eliminate the cpm value and retain the $\mu\text{Ci/cc}$ value, which allows for changes in radiation monitoring equipment without the need for an associated TS change.

The enclosure to this submittal provides a description and technical evaluation of the proposed change, a regulatory evaluation, and a discussion of environmental considerations. Attachment 1 to the enclosure provides the existing WBN Units 1 and 2 TS pages marked up to show the proposed changes. Attachment 2 to the enclosure provides the existing WBN Units 1 and 2 TS pages retyped to show the proposed changes. No changes to the TS Bases are proposed.

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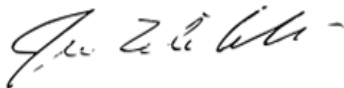
TVA has determined that there are no significant hazards considerations associated with the proposed changes and that the TS changes qualify for a categorical exclusion from environmental review pursuant to the provisions of 10 CFR 51.22(c)(9). In accordance with 10 CFR 50.91(b)(1), TVA is sending a copy of this letter and enclosure to the Tennessee State Department of Environment and Conservation.

TVA requests approval of the proposed license amendment within one year from the date of this submittal with implementation within 30 days of issuance of the amendment.

There are no new regulatory commitments associated with this submittal. Please address any questions regarding this request to Kimberly D. Hulvey, Senior Manager, Fleet Licensing, at (423) 751-3275.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 1st day of June 2021.

Respectfully,



James T. Polickoski
Director, Nuclear Regulatory Affairs

Enclosure: Evaluation of Proposed Change

cc (Enclosure):

NRC Regional Administrator – Region II
NRC Senior Resident Inspector – Watts Bar Nuclear Plant
NRC Project Manager – Watts Bar Nuclear Plant
Director, Division of Radiological Health – Tennessee State Department of
Environment and Conservation

Enclosure

Evaluation of Proposed Change

Subject: **Application to Revise the Measurement Units for the Watts Bar Nuclear Plant, Unit 1 and Unit 2 Technical Specifications for the Containment Vent Isolation Instrumentation and Control Room Emergency Ventilation System Radiation Monitors (WBN-TS-19-25)**

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2. Proposed TS Changes (Final Typed) for WBN Units 1 and 2

1.0 SUMMARY DESCRIPTION

In accordance with the provisions of Title 10 of the *Code of Federal Regulations* (10 CFR) 50.90, "Application for amendment of license, construction permit, or early site permit," Tennessee Valley Authority (TVA) is requesting a license amendment to Facility Operating License Nos. NPF-90 and NPF-96 for the Watts Bar Nuclear Plant (WBN), Units 1 and 2.

The license amendment request (LAR) revises WBN Units 1 and 2 Technical Specification (TS) 3.3.6, "Containment Vent Isolation Instrumentation" and TS 3.3.7, "Control Room Emergency Ventilation System (CREVS) Actuation Instrumentation," to delete a redundant unit of measure associated with the trip setpoint of TS Table 3.3.6-1, Function 3, "Containment Purge Exhaust Radiation Monitors" and TS Table 3.3.7-1, Function 2, "Control Room Radiation Control Room Air Intakes," respectively. The existing TS Tables 3.3.6-1 and 3.3.7-1 contain two equivalent units of measure for the allowable value (AV). The AVs in TS Tables 3.3.6-1 and 3.3.7-1 are described in microcuries per cubic centimeter ($\mu\text{Ci/cc}$) and the equivalent counts per minute (cpm). This change is requested to eliminate the cpm value and retain the $\mu\text{Ci/cc}$ value, which allows for changes in radiation monitoring equipment without the need for an associated TS change.

2.0 DETAILED DESCRIPTION

2.1 BACKGROUND

TS Table 3.3.6-1, Function 3

WBN Unit 1 License Amendment 74 (Reference 1) revised the AV for the containment purge exhaust radiation monitors in Function 3 to WBN Unit 1 TS Table 3.3.6-1, from $\leq 8.41\text{E-}02 \mu\text{Ci/cc}$ ($8.41\text{E+}04$ cpm) to $\leq 2.8\text{E-}02 \mu\text{Ci/cc}$ ($2.8\text{E+}04$ cpm) in order to resolve a non-conservatism for this AV when operating in Modes 1 through 4. The previous AV of $\leq 8.41\text{E-}02 \mu\text{Ci/cc}$ ($8.41\text{E+}04$ cpm) was retained only for movement of irradiated fuel assemblies within containment. As noted in Section 4.0 of Reference 1, the revision to the setpoint values for the containment purge exhaust radiation monitors did not change the function or operation of the Containment Purge Air Exhaust System.

Subsequently, in WBN Unit 1 License Amendment 92 (Reference 2), which implemented the alternate source term methodology, WBN Unit 1 TS Table 3.3.6-1 was revised to eliminate the requirements associated with movement of irradiated fuel in the containment or the fuel handling area. Consequently, the AV of $\leq 8.41\text{E-}02 \mu\text{Ci/cc}$ for the containment purge exhaust radiation monitors, which applied during movement of irradiated fuel assemblies within containment, was eliminated and the current AV of $\leq 2.8\text{E-}02 \mu\text{Ci/cc}$ ($2.8\text{E+}04$ cpm) for the containment purge exhaust radiation monitors was retained.

When WBN Unit 2 was licensed (Reference 3), the AV of $\leq 2.8\text{E-}02 \mu\text{Ci/cc}$ was also applied to Function 3 in WBN Unit 2 TS Table 3.3.6-1; however, the cpm for the WBN Unit 2 containment purge exhaust radiation monitors is different from the cpm for WBN Unit 1 containment purge exhaust radiation monitors (i.e., 1.14×10^4 cpm for WBN Unit 2 versus $2.8\text{E+}04$ cpm for WBN Unit 1). The rationale for this difference was described in the TVA response to Nuclear Regulatory Commission (NRC) comments on the development of the

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WBN Unit 2 TS (Reference 4), which stated “The values in parentheses are different for the two units because of differences in the detector sensitivities for the instruments in Units 1 and 2.” A future design change is planned to make the containment purge exhaust radiation monitors consistent for both units.

TS Table 3.3.7-1, Function 2

WBN Unit 1 License Amendment 41 (Reference 5) revised the AV for the control room radiation control room air intakes in Function 2 to WBN Unit 1 TS Table 3.3.7-1, from the initial licensed value of $\leq 5.77\text{E-}04 \mu\text{Ci/cc}$ (20,199 cpm) to $\leq 9.45\text{E-}05 \mu\text{Ci/cc}$ (3,308 cpm) due to TVA's reanalysis of the dose calculations for the main steam line break and the steam generator tube rupture accidents. Subsequently, in WBN Unit 1 License Amendment 91 (Reference 6), the AV for Function 2 to WBN Unit 1 TS Table 3.3.7-1 was changed to its current value of $\leq 1.647\text{E-}04 \mu\text{Ci/cc}$ (3,308 cpm) due to an error correction in the calculation of the AV. When WBN Unit 2 was licensed (Reference 3), the AV of $\leq 1.647\text{E-}04 \mu\text{Ci/cc}$ (3,308 cpm) was also applied to Function 2 in WBN Unit 2 TS Table 3.3.7-1.

2.2 PROPOSED CHANGE

The license amendment request (LAR) proposes the following changes to WBN Units 1 and 2 TS Table 3.3.6-1, Function 3, and TS Table 3.3.7-1, Function 2:

WBN Unit 1 Table 3.3.6-1

<i>FUNCTION</i>	<i>REQUIRED CHANNELS</i>	<i>SURVEILLANCE REQUIREMENTS</i>	<i>ALLOWABLE VALUE</i>
3. <i>Containment Purge Exhaust Radiation Monitors</i>	2	SR 3.3.6.1 SR 3.3.6.4 SR 3.3.6.7	$\leq 2.8\text{E-}02 \mu\text{Ci/cc}$ ($2.8\text{E+}04 \text{cpm}$)

WBN Unit 2 Table 3.3.6-1

<i>FUNCTION</i>	<i>REQUIRED CHANNELS</i>	<i>SURVEILLANCE REQUIREMENTS</i>	<i>ALLOWABLE VALUE</i>
3. <i>Containment Purge Exhaust Radiation Monitors</i>	2	SR 3.3.6.1 SR 3.3.6.4 SR 3.3.6.7	$\leq 2.8\text{E-}02 \mu\text{Ci/cc}$ ($1.14 \times 10^4 \text{cpm}$)

WBN Units 1 and 2 Table 3.3.7-1

<i>FUNCTION</i>	<i>REQUIRED CHANNELS</i>	<i>SURVEILLANCE REQUIREMENTS</i>	<i>ALLOWABLE VALUE</i>
2. <i>Control Room Radiation Control Room Air Intakes</i>	2	SR 3.3.7.1 SR 3.3.7.2 SR 3.3.7.4	$\leq 1.647\text{E-}04 \mu\text{Ci/cc}$ ($3,308 \text{cpm}$)

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The above proposed change to WBN Units 1 and 2 TS Table 3.3.7-1 also corrects a typographical error regarding the units of measure for the AV of Function 2. The current AV of Function 2 in WBN Units 1 and 2 Table 3.3.7-1 is in " $\mu\text{C/cc}$;" however, the correct term is " $\mu\text{Ci/cc}$," which is consistent with the AV for Function 3 of WBN Units 1 and 2 TS Table 3.3.6-1.

Attachment 1 to this enclosure provides the existing WBN Units 1 and 2 TS pages marked up to show the proposed changes. Attachment 2 to this enclosure provides the existing WBN Units 1 and 2 TS pages retyped to show the proposed changes. No changes to the TS Bases are proposed.

2.3 CONDITION INTENDED TO RESOLVE

The current AV setpoint contains units of both $\mu\text{Ci/cc}$ and cpm. The cpm units are specific to the installed radiation monitors and would require a change to the TSs whenever the radiation monitors are replaced with a different type. The unit of $\mu\text{Ci/cc}$ is consistent with the units assumed in the TVA calculation for the safety limit and is independent of the unit of measure based on a specific radiation monitor type or manufacturer.

3.0 TECHNICAL EVALUATION

3.1 SYSTEM DESCRIPTION

Containment Purge Air Exhaust Monitors

The reactor building purge ventilation system (RBPVS) is designed to maintain the environment in the primary containment and Shield Building annulus within acceptable limits for equipment operation; for personnel access during inspection, testing, maintenance, and refueling operations; and to provide a filtration path for any through-duct outleakage from the primary containment to limit the release of radioactivity to the environment.

The primary containment exhaust is monitored by redundant and independent gaseous radiation detectors, which measure the radioactivity levels of the containment purge exhaust and provide automatic RBPVS isolation upon detecting the setpoint radioactivity in the exhaust air stream. Redundant monitor assemblies are provided and are powered from separate Class 1E power trains. The RBPVS isolation valves automatically close upon the actuation of a containment ventilation isolation signal, or upon manual actuation from the main control room (MCR). This action isolates the containment atmosphere from the environment to minimize releases of radioactivity in the event of an accident. The RBPVS may be in use during reactor operation and with the reactor shutdown.

Main Control Room Air Intake Monitors

The Control Building outside air intakes are provided with radiation monitors, and smoke detectors. Indicators are provided with the radiation monitors. MCR common annunciation is provided. Isolation of the MCR habitability zone occurs automatically upon the actuation of a safety injection signal from either unit, upon indication of high radiation, or smoke concentrations in the outside air supply stream to the building.

Two redundant safety-related radiation monitor assemblies continuously monitor the normal intake air to the MCR for an indication of abnormal airborne activity. The radiation monitor assemblies are powered from separate Class 1E power trains. In the event of an alarm condition in the normal intake, the radiation monitors initiate MCR isolation and the CREVS.

The CREVS provides an enclosed control room environment from which the unit can be operated following an uncontrolled release of radioactivity. During normal operation, the control building ventilation system provides control room ventilation. Upon receipt of an actuation signal, the CREVS initiates filtered ventilation and pressurization of the MCR. This system is described in the WBN Units 1 and 2 TS Bases 3.7.10, "Control Room Emergency Ventilation System."

3.2 TECHNICAL ANALYSIS

Containment Purge Air Exhaust Monitors

WBN Unit 1 and 2 TS Table 3.3.6-1 specifies the AVs for the containment purge exhaust radiation monitors. This AV is based on expected concentrations for a small break loss of coolant accident (LOCA). The specified AV is more conservative than the determined analytical limit, based on ensuring the regulatory limit is met, and accounting for instrument uncertainties appropriate to the trip function.

The TS AV for these radiation monitors is not being modified in this proposed amendment. To remove the reliance of the AV on the specific radiation monitor in use in the system, the parenthetical AV value in cpm is removed. This will leave the AV value expressed in $\mu\text{Ci/cc}$, which is consistent with the units assumed in the TVA calculation for the safety limit.

Main Control Room Air Intake Monitors

WBN Unit 1 and 2 TS Table 3.3.7-1 specifies the AVs for the control room air intake radiation monitors. This AV is based on 10 CFR 50, Appendix A, General Design Criterion (GDC) 19 exposure limits considering the most limiting accident, which has been determined to be a steam generator tube rupture event. This event is more limiting than a fuel handling accident event or a LOCA. The specified AV is more conservative than the determined analytical limit, based on ensuring the regulatory limit is met, and accounting for instrument uncertainties appropriate to the trip function.

The TS AV for these radiation monitors is not being modified in this proposed amendment. To remove the reliance of the AV on the specific radiation monitor in use in the system, the parenthetical AV value in cpm is removed. This will leave the AV value expressed in $\mu\text{Ci/cc}$, which is consistent with the units assumed in the TVA calculation for the safety limit.

3.3 CONCLUSION

The proposed LAR in support of removing redundant units of measure from TS Tables 3.3.6-1 and 3.3.7-1 is acceptable because the AVs of the radiation monitoring instrumentation are not being changed. The radiation monitors continue to perform their intended safety function as currently described in the TS.

4.0 REGULATORY EVALUATION

4.1 APPLICABLE REGULATORY REQUIREMENTS AND CRITERIA

General Design Criteria

WBN Units 1 and 2 were designed to meet the intent of the "Proposed General Design Criteria for Nuclear Power Plant Construction Permits" published in July 1967. The WBN construction permit was issued in January 1973. The dual-unit updated final safety analysis report (UFSAR), however, addresses the NRC GDC published as Appendix A to 10 CFR 50 in July 1971. Conformance with the GDCs is described in Section 3.1.2 of the UFSAR.

Each criterion listed below is followed by a discussion of the design features and procedures that meet the intent of the criteria. Any exception to the 1971 GDC resulting from the earlier commitments is identified in the discussion of the corresponding criterion.

Criterion 16-Containment Design. Reactor containment and associated systems shall be provided to establish an essentially leaktight barrier against the uncontrolled release of radioactivity to the environment and to assure that the containment design conditions important to safety are not exceeded for as long as postulated accident conditions require.

Compliance with GDC 16 is described in Section 3.1.2.2 of the WBN UFSAR.

Criterion 19-Control Room. A control room shall be provided from which actions can be taken to operate the nuclear power unit safely under normal conditions and to maintain it in a safe condition under accident conditions including LOCAs. Adequate radiation protection shall be provided to permit access and occupancy of the control room under accident conditions without personnel receiving radiation exposures in excess of 5 rem whole body, or its equivalent to any part of the body, for the duration of the accident.

Equipment at appropriate locations outside the control room shall be provided (1) with a design capability for prompt hot shutdown of the reactor, including necessary instrumentation and controls to maintain the unit in a safe condition during hot shutdown, and (2) with a potential capability for subsequent cold shutdown of the reactor through the use of suitable procedures.

Compliance with GDC 19 is described in Section 3.1.2.2 of the WBN UFSAR.

Criterion 60-Control of Releases of Radioactive Materials to the Environment. The nuclear power unit design shall include means to control suitably the release of radioactive materials in gaseous and liquid effluents and to handle radioactive solid wastes produced during normal reactor operation, including anticipated operational occurrences. Sufficient holdup capacity shall be provided for retention of gaseous and liquid effluents containing radioactive materials, particularly where unfavorable site environmental conditions can be expected to impose unusual operational limitations upon the release of such effluents to the environment

Compliance with GDC 60 is described in Section 3.1.2.6 of the WBN UFSAR.

Criterion 64-Monitoring Radioactivity Releases. Means shall be provided for monitoring the reactor containment atmosphere, spaces containing components for recirculation of LOCA fluids, effluent discharge paths, and the plant environs for radioactivity that may be released from normal operations, including anticipated operational occurrences, and from postulated accidents.

Compliance with GDC 64 is described in Section 3.1.2.6 of the WBN UFSAR.

4.2 PRECEDENT

This LAR is similar in nature to License Amendments 231 and 228 for the Joseph M. Farley Nuclear Plant, Units 1 and 2, respectively (Reference 7), which revised TS 3.3.7, "Control Room Emergency Filtration/Pressurization System (CREFS) Actuation Instrumentation," to change the unit of measure associated with the trip setpoint of TS Table 3.3.7-1, Function 3, "Control Room Radiation Control Room Air Intake (R-35A, B)," from ≤ 800 cpm to an equivalent value of $\leq 1.0 \times 10^{-5}$ $\mu\text{Ci/cc}$. As noted in Section 2.2.2 of Reference 7, the purpose of this change was "to provide a universal trip setpoint value that allows for flexible changes in radiation monitoring equipment without the need for an associated TS change." The proposed change in this LAR is similar to Reference 7 in that the LAR deletes the cpm units, which are specific to the installed radiation monitors, and retains the unit of $\mu\text{Ci/cc}$, which is consistent with the units assumed in the TVA calculation for the safety limit and is independent of the unit of measure based on a specific radiation monitor type or manufacturer.

4.3 NO SIGNIFICANT HAZARDS CONSIDERATION

Tennessee Valley Authority (TVA) is requesting an amendment to Facility Operating Licenses NPF-90 and NPF-96 for the Watts Bar Nuclear Plant (WBN), Units 1 and 2, respectively. The proposed amendment revises the WBN Units 1 and 2 Technical Specification (TS) 3.3.6, "Containment Vent Isolation Instrumentation," and TS 3.3.7, "CREVS Actuation Instrumentation." The proposed license amendment request (LAR) deletes a redundant unit of measure associated with the trip setpoint of TS Table 3.3.6-1, Function 3, "Containment Purge Exhaust Radiation Monitors" and TS Table 3.3.7-1, Function 2, "Control Room Radiation Control Room Air Intakes." The existing TS Tables 3.3.6-1 and 3.3.7-1 contain two equivalent units of measure for the allowable value (AV). The AVs in TS Tables 3.3.6-1 and 3.3.7-1 are described in microcuries per cubic centimeter ($\mu\text{Ci/cc}$) and the equivalent counts per minute (cpm). This change is requested to eliminate the cpm value and retain the $\mu\text{Ci/cc}$ value, which allows for changes in radiation monitoring equipment without the need for an associated TS change.

TVA has evaluated whether or not a significant hazards consideration is involved with the proposed amendments by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of Amendment," as discussed below:

1. *Does the proposed amendment involve a significant increase in the probability or consequence of an accident previously evaluated?*

Response: No.

The proposed amendment does not affect accident initiators or precursors nor adversely alter the design assumptions, conditions, and configuration of the facility. The proposed amendment does not alter any plant equipment or operating practices with respect to such initiators or precursors in a manner that the probability of an accident is increased. The proposed amendment represents an administrative change and does not involve a physical change to the containment purge exhaust radiation monitors or the control room radiation air intake monitors, nor does it change the safety function of the instrumentation or the equipment supported by the instrumentation. The change deletes a redundant unit of measure for the allowable values of these instruments. As a result, the proposed amendment does not alter assumptions relative to the mitigation of an accident or transient event, and therefore, the consequences of an accident are not changed.

Based on the above, it is concluded that the proposed change does not involve a significant increase in the probability or consequence of an accident previously evaluated.

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

Response: No.

With respect to a new or different kind of accident, there are no proposed design changes to the containment purge exhaust radiation monitors or the control room radiation air intake monitors; nor are there any changes in the method by which safety related plant structures, systems, and components (SSCs) perform their specified safety functions. The proposed amendment will not affect the normal method of plant operation or revise any operating parameters. No new accident scenarios, transient precursors, failure mechanisms, or limiting single failures will be introduced as a result of this proposed change and the failure modes and effects analyses of SSCs important to safety are not altered as a result of this proposed administrative change.

Based on the above, it is concluded that the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

3. *Does the proposed change involve a significant reduction in a margin of safety?*

Response: No.

Control room and containment radiation monitoring is designed to ensure safety limits are not exceeded during design basis events. The containment purge exhaust and control room ventilation high radiation isolation functions are not altered as a result of the proposed administrative change nor are calculations for the safety limit. The change deletes a redundant unit of measure from the

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containment purge exhaust radiation monitors and the control room radiation air intake monitors.

Therefore, the proposed change does not involve a significant reduction in a margin of safety.

Based on the above, it is concluded that the proposed amendment does not involve a significant hazards consideration under the standards set forth in 10 CFR 50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

4.4 CONCLUSION

In conclusion, based on the considerations discussed above, (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

5.0 ENVIRONMENTAL CONSIDERATION

A review has determined that the proposed amendment would change a requirement with respect to installation or use of a facility component located within the restricted area, as defined in 10 CFR 20, or would change an inspection or surveillance requirement. However, the proposed amendment does not involve (i) a significant hazards consideration, (ii) a significant change in the types or significant increase in the amounts of any radioactive effluents that may be released offsite, or (iii) a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(9). Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

6.0 REFERENCES

1. NRC letter to TVA, "Watts Bar Nuclear Plant, Unit 1 – Issuance of Amendment Regarding the Allowable Value for the Containment Purge Exhaust Radiation Monitors (TAC No. MD8395)," dated January 8, 2009 (ML083380369)
2. NRC letter to TVA, "Watts Bar Nuclear Plant, Unit 1 – Issuance of Amendment to Allow Selective Implementation of Alternate Source Term to Analyze the Dose Consequences Associated with Fuel-Handling Accidents (TAC No. ME8877)," dated June 19, 2013 (ML13141A564)
3. NRC letter to TVA, "Issuance of Facility Operating License No. NPF-96, Watts Bar Nuclear Plant Unit 2," dated October 22, 2015 (ML15251A587)
4. TVA letter to NRC, "Watts Bar Nuclear Plant (WBN) Unit 2 - Response to NRC Staff Comments on Developmental Revisions of the Unit 2 Technical Specifications (TS) and Technical Specifications Bases (TS Bases); Submittal of Developmental Revision F," dated June 21, 2011 (ML11174A282)
5. NRC letter to TVA, "Watts Bar Nuclear Plant, Unit 1 – Issuance of Amendment Regarding Reactor Coolant System Specific Activity (TAC No. MB3831)," dated November 18, 2002 (ML023240483)
6. NRC letter to TVA, "Watts Bar Nuclear Plant, Unit 1 – Issuance of Amendment Regarding Technical Specification Changes in Dose Equivalent I-131 Spike Limit and Allowable Value for Control Room Air Intake Radiation Monitors (TAC No. ME8156)," dated December 5, 2012 (ML12279A115)
7. NRC letter to Southern Nuclear Operating Company, "Joseph M. Farley Nuclear Plant, Units 1 and 2 – Issuance of Amendment Nos. 231 and 228 to Revise Technical Specifications 3.3.1 and 3.3.7 (EPID L-2019-LLA-0278)," dated October 13, 2020 (ML20224A285)

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Attachment 1

Proposed TS Changes (Markups) for WBN Units 1 and 2

Table 3.3.6-1 (page 1 of 1)
Containment Vent Isolation Instrumentation

FUNCTION		REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1.	Manual Initiation	2	SR 3.3.6.6	NA
2.	Automatic Actuation Logic and Actuation Relays	2 trains	SR 3.3.6.2 SR 3.3.6.3 SR 3.3.6.5	NA
3.	Containment Purge Exhaust Radiation Monitors	2	SR 3.3.6.1 SR 3.3.6.4 SR 3.3.6.7	$\leq 2.8\text{E-}02 \mu\text{Ci/cc}$ (2.8E+04 cpm)
4.	Safety Injection	Refer to LCO 3.3.2, "ESFAS Instrumentation," Function 1, for all initiation functions and requirements.		

Table 3.3.7-1 (page 1 of 1)
CREVS Actuation Instrumentation

FUNCTION		REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1.	Manual Initiation	2 trains	SR 3.3.7.3	NA
2.	Control Room Radiation Control Room Air Intakes	2	SR 3.3.7.1 SR 3.3.7.2 SR 3.3.7.4	$\leq 1.647\text{E-}04 \text{ }\mu\text{Ci/cc}$ (3,308 cpm)
3.	Safety Injection	Refer to LCO 3.3.2, "ESFAS Instrumentation," Function 1, for all initiation functions and requirements.		

Table 3.3.6-1 (page 1 of 1)
Containment Vent Isolation Instrumentation

FUNCTION	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Manual Initiation	2	SR 3.3.6.6	NA
2. Automatic Actuation Logic and Actuation Relays	2 trains	SR 3.3.6.2 SR 3.3.6.3 SR 3.3.6.5	NA
3. Containment Purge Exhaust Radiation Monitors	2	SR 3.3.6.1 SR 3.3.6.4 SR 3.3.6.7	$\leq 2.8\text{E-}02 \mu\text{Ci/cc}$ (1.14×10^4 cpm)
4. Safety Injection	Refer to LCO 3.3.2, "ESFAS Instrumentation," Function 1, for all initiation functions and requirements.		

Table 3.3.7-1 (page 1 of 1)
CREVS Actuation Instrumentation

FUNCTION	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Manual Initiation	2 trains	SR 3.3.7.3	NA
2. Control Room Radiation Control Room Air Intakes	2	SR 3.3.7.1 SR 3.3.7.2 SR 3.3.7.4	$\leq 1.647\text{E-}04 \mu\text{Ci/cc}$ -(3,308 cpm)
3. Safety Injection	Refer to LCO 3.3.2, "ESFAS Instrumentation," Function 1, for all initiation functions and requirements.		

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Attachment 2

Proposed TS Changes (Final Typed) for WBN Units 1 and 2

Table 3.3.6-1 (page 1 of 1)
Containment Vent Isolation Instrumentation

FUNCTION		REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1.	Manual Initiation	2	SR 3.3.6.6	NA
2.	Automatic Actuation Logic and Actuation Relays	2 trains	SR 3.3.6.2 SR 3.3.6.3 SR 3.3.6.5	NA
3.	Containment Purge Exhaust Radiation Monitors	2	SR 3.3.6.1 SR 3.3.6.4 SR 3.3.6.7	$\leq 2.8\text{E-}02 \mu\text{Ci/cc}$
4.	Safety Injection	Refer to LCO 3.3.2, "ESFAS Instrumentation," Function 1, for all initiation functions and requirements.		

Table 3.3.7-1 (page 1 of 1)
CREVS Actuation Instrumentation

FUNCTION		REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1.	Manual Initiation	2 trains	SR 3.3.7.3	NA
2.	Control Room Radiation Control Room Air Intakes	2	SR 3.3.7.1 SR 3.3.7.2 SR 3.3.7.4	≤1.647E-04 μCi/cc
3.	Safety Injection	Refer to LCO 3.3.2, "ESFAS Instrumentation," Function 1, for all initiation functions and requirements.		

Table 3.3.6-1 (page 1 of 1)
Containment Vent Isolation Instrumentation

FUNCTION	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Manual Initiation	2	SR 3.3.6.6	NA
2. Automatic Actuation Logic and Actuation Relays	2 trains	SR 3.3.6.2 SR 3.3.6.3 SR 3.3.6.5	NA
3. Containment Purge Exhaust Radiation Monitors	2	SR 3.3.6.1 SR 3.3.6.4 SR 3.3.6.7	$\leq 2.8\text{E-}02 \text{ } \mu\text{Ci/cc}$
4. Safety Injection	Refer to LCO 3.3.2, "ESFAS Instrumentation," Function 1, for all initiation functions and requirements.		

Table 3.3.7-1 (page 1 of 1)
CREVS Actuation Instrumentation

FUNCTION	REQUIRED CHANNELS	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
1. Manual Initiation	2 trains	SR 3.3.7.3	NA
2. Control Room Radiation Control Room Air Intakes	2	SR 3.3.7.1 SR 3.3.7.2 SR 3.3.7.4	$\leq 1.647\text{E-}04 \text{ } \mu\text{Ci/cc}$
3. Safety Injection	Refer to LCO 3.3.2, "ESFAS Instrumentation," Function 1, for all initiation functions and requirements.		