



Georgia Power

the southern electric system

J. T. Beckham, Jr.
Vice President—Nuclear
Hatch Project

HL-1453
001166

February 4, 1992

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D. C. 20555

EDWIN I. HATCH NUCLEAR PLANT - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS
NRC TAC Nos. M79919 and M79920

Gentlemen:

In accordance with the provisions of 10 CFR 50.90, as required by 10 CFR 50.59(c)(1), Georgia Power Company (GPC) hereby proposes changes to the Plant Hatch Units 1 and 2 Technical Specifications (TS), Appendix A to Operating Licenses DPR-57 and NPF-5. These changes are the result of extensive discussions with NRC staff personnel and supercedes our submittal of February 26, 1991 in its entirety.

The proposed changes modify various instrumentation surveillance requirements for both Hatch units. Specifically, ACTION statements have been added which allow instrument channels to be inoperable for required surveillance testing without initiating more restrictive actions. Also, the functional test intervals on selected instrumentation will be extended, based on NRC-approved methodology. To accomplish these objectives, the following TS changes have been included in this proposed amendment:

1. The channel functional test frequency of various Emergency Core Cooling System (ECCS), control rod block and isolation actuation instrumentation has been changed from monthly to quarterly. Also, a 6-hour allowable outage time (AOT) for surveillance and a 12-hour AOT for repair have been provided in the action statements. This change is consistent with the NRC-approved Boiling Water Reactor Owners' Group (BWROG) Technical Specification Improvement (TSI) methodology as issued in GE Topical Reports NEDC-30936P-A, NEDC-30851P-A, NEDC-31677P-A (References 1, 2 and 3), and GENE-770-06-1 (Reference 5).

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2. Selected instrumentation tables in the Unit 1 TS have been reformatted to more closely resemble the Unit 2 TS and the existing BWR-4 Standard Technical Specifications (STS).
3. Changes to other instrumentation channel specifications are also proposed to provide a 6-hour AOT in which an instrument can be inoperable so that TS surveillances can be performed without entering LCO Action statements.
4. The channel functional test frequency of the Reactor Protection System (RPS) instrumentation surveillances are also proposed to be changed from monthly to quarterly with a 6-hour AOT for required surveillance testing.
5. Minor editorial changes to various TS pages are also proposed.

Enclosure 1 provides detailed descriptions of the proposed changes and the circumstances necessitating the change request. Enclosure 2 details the bases for our determination that the proposed changes do not involve significant hazards considerations. Enclosure 3 provides page change instructions for incorporating the revised pages. The proposed changed TS pages, along with a marked-up copy of the current TS pages, follow Enclosure 3.

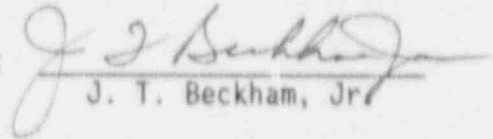
To allow time for procedural revisions and orderly incorporation into copies of the TS, GPC requests the proposed amendment, once approved by the NRC, be issued with an effective date to be no later than 60 days from the date of issuance of the amendment.

In accordance with the requirements of 10 CFR 50.91, a copy of this letter and all applicable enclosures will be sent to Mr. L. Barrett of the Environmental Protection Division of the Georgia Department of Natural Resources.


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Mr. J. T. Beckham, Jr. states he is Vice President of Georgia Power Company and is authorized to execute this oath on behalf of Georgia Power Company, and to the best of his knowledge and belief, the facts set forth in this letter are true.

GEORGIA POWER COMPANY

BY: 
J. T. Beckham, Jr.

Sworn to and subscribed before me this 31st day of January 1992.


Notary Public
MY COMMISSION EXPIRES APRIL 19, 1993

JTB/LPD

References:

1. NEDC-30936P-A, "BWR Owners' Group Technical Specification Improvement Methodology (With Demonstration for BWR ECCS Actuation Instrumentation)", June 1987.
2. NEDC-30851P-A, "Technical Specification Improvement Analysis for BWR Reactor Protection System", March 1988.
3. NEDC-31677P-A, "Technical Specification Analysis for BWR Isolation Actuation Instrumentation", July 1990.
4. NEDC-30851P-A, Supplement 1, "Technical Specification Improvement Analysis for BWR Control Rod Block Instrumentation", October 1988.
5. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-Of-Service Times for Selected Instrumentation Technical Specifications", February 1991.

Enclosures:

1. Basis for Change Request
2. 10 CFR 50.92 Evaluation
3. Page Change Instructions

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c: Georgia Power Company
Mr. H. L. Sumner, General Manager - Plant Hatch
NORMS

U. S. Nuclear Regulatory Commission, Washington, D. C.
Mr. K. Jabbour, Licensing Project Manager - Hatch

U. S. Nuclear Regulatory Commission, Region II
Mr. S. D. Ebnetter, Regional Administrator
Mr. L. D. Wert, Senior Resident Inspector - Hatch

State of Georgia
Mr. L. Barrett, Commissioner - Department of Natural Resources

ENCLOSURE 1

EDWIN I. HATCH NUCLEAR PLANT - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

PROPOSED CHANGE ONE:

This proposed change revises the Emergency Core Cooling System (ECCS), rod block and isolation actuation instrumentation channel functional test interval from monthly to quarterly. The affected Technical Specifications (TS) instrumentation for Units 1 and 2 is listed in Tables 1 and 2 of this enclosure. For instrumentation whose calibration is already quarterly, the channel functional test was changed to "N/A", since the channel calibration encompasses the channel functional test.

This proposed change also provides a 6-hour allowable outage time (AOT) for surveillance testing with one or more channels of one subsystem removed from service. The proposed 6-hour AOT for surveillance has been included (either added in a new footnote, revised in an existing footnote, or added as an Action statement) in the following tables and specifications:

Unit 1 - Tables 3.2-1 through 3.2-7 and Table 3.2-9

Unit 2 - Specifications: 3.1.4.3, 3.3.2, 3.3.3, 3.3.4 and 3.3.5.

In both units, the added or revised notes read as follows:

One instrument channel may be inoperable for up to 6 hours to perform required Surveillances prior to entering other applicable Actions.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

Next, Unit 1 TS Table 3.2-1 and Unit 2 Specification 3.3.2 have been revised to provide a 12-hour AOT for instrument repair, provided the instrument trip function in the remaining channel/trip system is still available. In Unit 1 Table 3.2-1 and Unit 2 Specification 3.3.2, the Action Statement regarding inoperable channels on one trip system has been revised to read as follows:

With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for one trip system, either

1. Place the inoperable channel(s) in the tripped condition within 12 hours

OR

2. Take the ACTION required by Table 3.3.2-1.
[Table 3.2-1 for Unit 1]

The provisions of Specification 3.0.4 are not applicable.
[Specification 3.0.4 is not contained in the Unit 1 TS.]

In addition, in Unit 1 Table 3.2-1, an AOT for restoring an inoperable single channel in lieu of tripping that channel has been established at 2 hours when tripping the channel would cause the trip function to occur.

Unit 1 TS Bases Section 3.2 and Unit 2 TS Bases Section 3/4.3 (for RPS) have been revised appropriately to reflect the above changes.

Finally, in accordance with General Electric (GE) Topical Report NEDC-31677P-A (Reference 3), this proposed change revises the daily channel checks for the isolation actuation instrumentation for both units to "once per shift" in order to establish consistency with the GE BWR-4 Standard Technical Specifications (STS), as well as with all channel checks.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

Basis for Proposed Change One:

This proposed change is justified based on information contained in GE Topical Reports NEDC-30936P-A (Reference 1), NEDC-30851P-A, Supplement 1 (Reference 4), NEDC-31677P-A (Reference 3), and GENE-770-06-1 (Reference 5). The subject reports provide a probabilistic basis for extending ECCS, rod block, isolation actuation and other instrumentation surveillance intervals. The generic analyses provided in these reports indicate the proposed interval extension (from monthly to quarterly) can be enacted without negatively affecting the functional capability or reliability of the systems. An NRC Safety Evaluation Report (SER) generically endorsing the methodology and changes provided in the referenced reports is provided at the beginning of each report, except for the GENE-770-06-1 report. Preparation by the NRC of the SERs for the GENE-770-06-1 report is currently in progress. Note that the NRC has already approved similar changes for RPS and rod block instrumentation in Unit 1 TS Amendment 163 and Unit 2 TS Amendment 100.

GPC and GE have reviewed the generic analyses and determined they are applicable to Plant Hatch Units 1 and 2. GPC has also reviewed the setpoint calculations associated with the affected instruments and determined the existing calculations will not be affected by changing the channel functional test interval from monthly to quarterly.

In the case of the isolation actuation instrumentation for the Reactor Building radiation, refueling floor radiation and Control Room inlet radiation (Unit 1 Table 4.2-8 and Unit 2 Table 4.3.2-1), the setpoints are field determined. GPC has reviewed the operating history of these instruments and determined the instrument drift is small enough to justify a quarterly channel functional test frequency.

Also, the safety relief valve (SRV) tailpipe pressure switches have setpoints that were developed as part of the environmental qualification program; these setpoints are not field adjustable. Since the switches are located in containment, the only tests conducted during operation involve circuit integrity. Therefore, the setpoints are not a consideration in changing the channel functional test frequency from monthly to quarterly.

There were several instruments of low significance that were not included in the GE Topical reports. The following discussion describes those

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

instruments and includes bases to justify a change to a quarterly channel functional test frequency.

1. Drywell Radiation - High (Units 1 & 2)

The logic for this instrumentation is one out of one for each isolation valve (two redundant isolation valves are provided). In addition, the instrumentation does not trip until a relatively high radiation level exists in the drywell. The valves are normally closed during plant operation and are opened only during drywell purge and vent. The probability of having a high radiation level when an isolation valve is open is very low; therefore, this situation was not explicitly modeled. Because of the relatively low significance of this instrumentation, the functional test frequencies can be changed from monthly to quarterly.

2. Reactor Shroud Water Level (Level 0) (Units 1 & 2)

This instrumentation prevents diversion of some LPCI flow to containment spray (a manually initiated function) when the vessel water level is low (Level 0). The Level 0 trip can be bypassed if failure occurs. Therefore, the effect of failure of the Level 0 signal has a negligible effect on the overall ECCS unavailability and was not explicitly modeled. Because of the relatively low significance of this instrumentation, the functional test frequencies can be changed from monthly to quarterly.

3. HPCI and RCIC Pump Suction Pressure - Low (Unit 1)

This instrumentation provides HPCI and RCIC turbine protection for Unit 1. Two redundant valves exist for HPCI and RCIC. The logic of the instrumentation is two out of two; the valve trips HPCI or RCIC turbine on low suction pressure. Based on the above, the effect of failure of the pump suction signal has a negligible effect on the overall ECCS unavailability and was therefore not explicitly modeled. Because of the relatively low significance of this instrumentation, the functional test frequencies can be changed from monthly to quarterly.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

4. HPCI and RCIC Pump Discharge Flow - High/Low (Unit 1)

With this instrumentation, failure in HPCI (or RCIC) minimum flow bypass line would be detected during turbine pump functional test. The effect of failure of the pump discharge flow signal was previously analyzed as part of the pump failure. Because of the relatively low significance of this instrumentation, the functional test frequencies can be changed from monthly to quarterly.

5. Filled Discharge Pipes Level Switches of HPCI, RCIC, CS and LPCI (Unit 1 Only)

Currently, filled discharge pipes are checked during CS and LPCI pump tests. Level switches perform only a monitoring function and therefore do not have a significant effect on the overall ECCS unavailability. Because of the relatively low significance of this instrumentation, the functional test frequencies can be changed from monthly to quarterly.

As noted in Tables 1 and 2 of this enclosure, many of the subject instruments whose channel functional checks are proposed to be changed from monthly to quarterly are in the Analog Transmitter Trip System (ATTS). As documented in GPC letters to the NRC dated July 24, 1985 and January 23, 1984, ATTS setpoints are calculated using the methodology of Regulatory Guide 1.105 and are designed for a quarterly channel functional test interval. Also, the setpoint calculations for ATTS generally assume a channel functional test interval of 6 months. Since the initial installation of ATTS in 1984, the trip units, which have an assumed 6-month channel functional test frequency in the setpoint calculations, have shown very little drift and few failures. Before approving similar changes for the Reactor Protection System (RPS) instrumentation tables, the NRC staff reviewed actual ATTS surveillance test data from Plant Hatch. The referenced GE Topical Reports also provide the basis for including in the Plant Hatch TS a 6-hour AOT for surveillance testing and a 12-hour AOT for repair. For clarity, GPC has made some editorial revisions to the AOT note provided in the GE Topical Reports; the intent of the note has not been changed. GPC has revised the isolation actuation Action for operation with a channel inoperable to achieve consistency

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

with the Action Statement revisions provided in NEDC-31677P-A. With one trip system inoperable, the AOT proposed for the Units 1 and 2 TS is 12 hours. With both trip systems inoperable, the AOT will remain 1 hour. This allows for consistency with the RPS instrumentation Action Statements approved for Plant Hatch. In addition to the proposed 6-hour AOT note, Unit 1 Table 3.2-7 Notes and Unit 2 Table 3.3.5-1 Notes for Control Rod Withdrawal Block Instrumentation contains an additional note. For Unit 1, the following note has been added, "Withdrawal of control rods is not permitted during required surveillance testing"; for Unit 2, the following note has been added, "Control rods cannot be withdrawn during channel functional testing and/or channel calibration." These notes are provided to assure that no control rods are withdrawn while allowing the required surveillances to be performed.

The 6-hour "waiver" of TS Actions has been applied to most instruments that perform a trip function. However, some trip functions are designed such that the removal of one trip system/channel could render the trip function inoperable. Previous conversations with the NRC staff resulted in an additional justification for this proposed note for those instruments that are included in the GE GENE and Topical Reports since it does not contain a provision for providing one operable channel in the same trip system for monitoring purposes. Justification for not using a provision of this kind is based on the instrumentation trip initiating logic and design. The following examples for HPCI discuss this fact:

1. In the case of the HPCI Pump Minimum Flow valve open signal (one-out-of-one logic), there is only one channel in the trip system; by design, this system is not single failure proof. However, other plant systems are available for high pressure transients.
2. Another example of initiating logic is the HPCI Reactor Water Level 8 trip signal (two-out-of-two logic). In this case, the single failure protection is not maintained since these instruments of HPCI were not originally designed as such. Both channels in this system have to sense in order for the trip function to initiate. Therefore, if one channel is out for testing, the other channel is providing no system trip capability.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

3. A third example is with the HPCI Low Steam Line Pressure isolation trip signal (two-out-of-two per division). Even though the provision can be applied, it has little meaning. In addition to the other channel in the same trip system monitoring the parameter, the other trip system continues to both monitor the parameter and provide a trip. The channel in the same trip system is providing no system trip capability and its monitoring function is already being performed by the other trip system.

As a point of note, the Unit 1 surveillance tables use the term "instrument functional test." Although GPC is not proposing a title change in every Unit 1 table at this time, the current philosophy used in the Unit 2 TS and the existing GE BWR-4 STS relative to the channel functional test will be applied to surveillance frequencies in the Unit 1 TS tables.

Approval of the proposed changes will result in consistent and accurate ECCS, rod block and isolation actuation instrumentation surveillance requirements for both Hatch units.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

PROPOSED CHANGE TWO:

This proposed change moves the instrumentation, which initiates isolation of HPCI, RCIC, and the Low Pressure Coolant Injection (LPCI) mode of RHR, from Plant Hatch Unit 1 LCO TS Tables 3.2-2, 3.2-3, and 3.2-5 (and their corresponding surveillance tables) to Unit 1 LCO Table 3.2-1 and surveillance table 4.2-1. This permits the application of consistent Action Statements to the isolation actuation instrumentation. This change is consistent with the GE BWR-4 STS and the Plant Hatch Unit 2 TS. The specific instruments being moved are listed in Table 3 of this enclosure. Also, for clarity, Unit 1 Tables 3.2-1 and 4.2-1 have been renamed to indicate the isolation actuation function, and the Table of Contents has been revised and reorganized to reflect these changes.

Basis for Proposed Change Two:

The equipment identified above is more appropriately termed isolation actuation instrumentation and is stated as such in both the GE BWR-4 STS and the Plant Hatch Unit 2 TS. Based on the results of the reliability studies presented in GE Topical Reports WEDC-30936P-A (Reference 1) and NEDC-31677P-A (Reference 3), and the differences in instrument function, the Action Statements for the ECCS and the isolation actuation instrumentation are different. By separating these instruments into the appropriate sections, the Action Statements can be more appropriately applied in the Unit 1 TS.

The only Action Statement in the Unit 1 TS undergoing significant revision as a result of this change is the Action relating to the reactor steam dome pressure instrument providing both a low-pressure signal to allow operation of the shutdown cooling mode and a low-pressure permissive, in conjunction with a containment isolation signal, to close the RHR injection valves. In current Unit 1 Tables 3.2-1 and 3.2-5, Actions are provided in the event the reactor steam dome pressure instrument is inoperable. Table 3.2-1 requires the shutdown cooling mode be isolated, and Table 3.2-5 requires the LPCI system be declared inoperable if the instrument is inoperable. In relocating the reactor steam dome pressure instrument to only an isolation

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REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

actuation table (as in the Plant Hatch Unit 2 TS and the GE BWR-4 STS), GPC propose the following Unit 2 Action Statement be adopted:

Close the shutdown cooling supply isolation valves unless reactor steam dome pressure \leq 145 psig.

The revised Action Statement is being proposed, since the inoperability of the reactor steam dome pressure instrument will not directly impact the operability of the LPCI system. This change is consistent with the Plant Hatch Unit 2 TS and the GE BWR-4 STS.

PROPOSED CHANGE THREE:

This proposed change adds the following note (as in the case of ECCS, rod block and isolation actuation instrumentation as discussed in Proposed Change One) to certain instrumentation tables and specifications in the Plant Hatch Units 1 and 2 TS:

One instrument channel may be inoperable for up to 6 hours to perform required Surveillances prior to entering other applicable Actions.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

The following tables and specifications have been revised:

<u>Unit 1</u>	<u>Unit 2</u>
T 3.2-8	S 3.1.3.5
T 3.2-10	S 3.3.6.1
T 3.2-11	S 3.3.6.2
T 3.2-12	S 3.3.6.3
T 3.2-14	S 3.3.6.4
S 3.14.1	S 3.3.6.5
T 3.14.2-1	S 3.3.6.7
S 4.6.H.1.e	S 3.3.6.9
S 4.6.H.2	S 3.3.6.10
	S 3.3.8
	S 3.3.9.1
	S 3.3.9.2
	S 3.4.2.1
	S 3.4.2.2
	S 3.4.3.1
	S 3.5.3.1
	S 3.5.4.1
	S 3.6.2.1
	S 3.9.2

LEGEND:

T = Table

S = Specification

Basis for Proposed Change Three:

The Plant Hatch TS provide channel functional test and channel calibration frequencies. When performing the surveillances, the TS require the instruments to be "out of service" for a period of time. In order to assure the instrumentation is not removed from service for an excessive amount of time for surveillance, an AOT of 6 hours has been established after discussions with Plant Hatch site personnel concerning the amount of time necessary to perform the surveillance.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

The surveillances were developed to ensure the availability of instrumentation to perform its design function. Therefore, providing a reasonable AOT in which to perform the surveillances supports instrumentation in the performance of its design function. This instrumentation has generally less safety importance than the ECCS, RPS and isolation actuation instrumentation previously reviewed by GE and generically approved by the NRC. Since surveillances are required by the Technical Specifications and LCOs generally have extended time action statements, it is appropriate to have 6-hour AOTs for this instrumentation.

Monitoring instrumentation does not provide input to any trip function necessary in the initial stages of an accident or transient. Therefore, it is not necessary to assure the monitoring function is preserved during the brief time intervals of required surveillances.

In addition, GPC's nuclear steam supply system (NSSS) vendor, GE, has reviewed the addition of the note for the instruments not included in the ECCS and isolation actuation instrumentation systems and determined these systems are not part of the primary success path of the design basis analysis/transient analysis. Therefore, the bases for the AOT for these systems can be established based on the lower safety significance of these systems.

PROPOSED CHANGE FOUR:

This proposed change makes minor changes to the reactor protection system (RPS) instrumentation surveillances to further incorporate improvements presented in GE Topical Report NEDC-30851P-A (Reference 2). NEDC-30851P was previously approved by the NRC for Plant Hatch-specific applications in Amendment 170 for Unit 1 and Amendment 100 for Unit 2. In both units, the proposed note reads as follows:

One instrument channel may be inoperable for up to 6 hours to perform required surveillances prior to entering other applicable ACTIONS, provided at least one OPERABLE channel in the same trip system is monitoring that parameter.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

Specifically, for the Unit 1 TS, notes are proposed to be added to Tables 3.1-1 to allow a channel to be made inoperable for surveillance purposes without placing the channel in the tripped condition for 6 hours. In the Unit 2 TS, the 6-hour note has been included in Specification 3.3.1. Also, the Unit 1 Bases for Specification 4.2 was revised to reflect the current information used to establish the surveillances.

Basis for Proposed Change Four:

The proposed change to incorporate the surveillance interval and AOT extensions into the TS is provided in the previously discussed GE Topical Reports (References 2 and 4), which have been generically endorsed by specific NRC SERs. The GE reports provide a probabilistic basis for extending RPS surveillance and, in the case of Plant Hatch Unit 1, equipment AOT. The methodology shows the requested interval extensions can be enacted without negatively affecting the functional capability or reliability of the RPS. GPC has previously submitted documentation to the NRC to demonstrate Plant Hatch is enveloped by these generic reports, as stated in GPC's submittal to the NRC dated March 27, 1986. These changes were inadvertently omitted from the March 27 submittal.

Setpoint calculations for the APRM instruments do not use the functional test frequency in its analyses. Only drift associated with a calibration interval is employed.

Approval of Proposed Change Four will result in consistent and correct RPS instrumentation surveillance requirements for both Hatch units.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

PROPOSED CHANGE FIVE:

This proposed change incorporates minor editorial corrections made to various TS for both Plant Hatch units. These proposed corrections include:

1. Unit 1 Tables 3.2-5 and 4.2-5. Since the reactor vessel steam dome pressure - low permissive instrument is being deleted from these tables, the remaining two reactor vessel steam dome pressure-low instruments are being uniquely identified.
2. Unit 1 Tables 4.2-1 and 4.2-2 (note d), and Tables 4.2-8 and 4.2-10 (note e). These notes, which concern instrument functional test minimum frequency to be performed initially once per month with an interval of not less than 1 month or more than 3 months, have been deleted from the proposed amendment.
3. Unit 1 Specification 4.9.A.7.b.2. Due to redundancy, this TS has been deleted from the proposed amendment.
4. Unit 2 Specification 4.3.1.1. The word "FUNCTION" has been changed to "FUNCTIONAL" in referencing a channel functional test.
5. Unit 2 Specification 4.3.1.3. The word "were" found in the last sentence of this paragraph has been changed to "where".
6. Unit 2 page 3/4 in the footnote, second line, the word "conditions" has been changed to "condition".
7. Unit 2 Table 3.3.5-1. For Trip Function, item 5.a, Water Level - High, the number "1" has been added under the column entitled Minimum Number of OPERABLE Channels Per Trip Function.
8. Unit 2 Table 3.3.6.2-1. For instrument number 3.b (Reactor Building 185' Level), the number "1" has been added under the column entitled Minimum Instruments OPERABLE.
9. Unit 2 Table 3.3.6.4-1. For instrument number 2, the word "shroud" has been replaced with the word "shroud".

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

10. Unit 1 Tables 3.2-2, item 11, and 3.2-3, item 10. The minimum number of operable channels per trip system has been changed from 1 to 2 to reflect actual logic arrangement.
11. Unit 1 Specification 3.6.H.1.a. In reference note "***" at bottom of page, the word "Relief" has been replaced with the word "Relief".
12. Unit 1 Table 4.2-10, Reference Number 3. The word "Particulates" under the Instrument descriptor column has been replaced with the word "Particulates".
13. Unit 1 Table 3.2-4. Previous submittal (August 30, 1990) to NRC included this page with a revision to note b (Amendment 170). This package reinstates the note as it read in Amendment 170, after the note was inadvertently changed by a subsequent amendment (No. 173).

Basis for Proposed Change Five:

The basis for the proposed changes described above are as follows:

1. The remaining two reactor vessel steam dome pressure - low instruments are being uniquely identified for clarity (as proposed instrument numbers 3 and 4 in the tables).
2. Since notes d and e are archaic with respect to the TS, they have been deleted from the proposed amendment. The test frequency will remain once per month, unless otherwise identified in this proposed amendment.
3. Since the functional testing requirements for the subject relays of the logic systems are already fully required by Unit 1 Tables 4.2-12 and 4.2-13, the specification should not have to be restated. Therefore, it has been deleted from the proposed amendment.
4. The term "CHANNEL FUNCTION TEST" is not defined in the Unit 2 TS; therefore, this is purely an editorial error.
5. Inputting the word "were" was a typographical error and, therefore, changing it to "where" is purely an editorial revision.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

6. Inputting the word "conditions" was a typographical error in that one inoperable channel in one trip system is logically placed in a single tripped condition. Deleting the "s" from "conditions" is purely an editorial change.
7. There is a single Minimum OPERABLE Channel per trip function for this particular instrument. The number "1" was inadvertently omitted and, therefore, adding the number is purely an editorial revision.
8. There is a single Minimum Instrument OPERABLE for instrument 3.b. This number was inadvertently omitted from the table; therefore adding the number "1" is purely an editorial change.
9. Inputting the word "shroud" was a typographical error and, therefore, changing it to "shroud" is purely an editorial change.
10. The actual logic design arrangement is a two-out-of-two. This is a typographical error in that the actual plant logic has not changed.
11. Inputting the word "Relief" was a typographical error and, therefore, changing it to "Relief" is purely an editorial change.
12. Inputting the word "Particulates" was a typographical error and, therefore changing it to "Particulates" is purely an editorial change.
13. Previous submittal on August 30, 1990 to the NRC contained this page with a modification to note b (Amendment 170). However, on October 9, 1990, GPC issued another submittal (Amendment 173) to the NRC which inadvertently used the note b that existed previous to Amendment 170. In this submittal, GPC is using the correct version of note b (as it existed after Amendment 170); therefore, this correction is an editorial change.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

REFERENCES:

1. NEDC-30936P-A, "BWR Owners' Group Technical Specification Improvement Methodology (With Demonstration for BWR ECCS Actuation Instrumentation)," June 1987.
2. NEDC-30851P-A, "Technical Specification Improvement Analyses for BWR Reactor Protection System," March 1988.
3. NEDC-31677P-A, "Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation," July 1990.
4. NEDC-30851P-A, Supplement 1, "Technical Specification Improvement Analyses for BWR Control Rod Block Instrumentation," October 1988.
5. GENE-770-06-1, "Bases for Changes to Surveillance Test Intervals and Allowed Out-Of-Service Times for Selected Instrumentation Technical Specifications", February 1991.

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

TABLE 1 (SHEET 1 OF 2)

UNIT 1 INSTRUMENTATION WITH REVISED SURVEILLANCE FREQUENCIES

<u>Isolation Actuation Instrumentation</u>	<u>TS Location</u>
1. Reactor Vessel Water Level 3*	T 4.2-1
2. Reactor Vessel Water Level 2*	T 4.2-1
3. Reactor Vessel Water Level 1*	T 4.2-1
4. Reactor Vessel Steam Dome Pressure - Low*#	T 4.2-1 & 4.2-5
5. Drywell Pressure*	T 4.2-1
6. Main Steam Line Pressure - Low*	T 4.2-1
7. Main Steam Line Flow*	T 4.2-1
8. Main Steam Line Tunnel Temp*	T 4.2-1
9. RWCU Differential Flow*	T 4.2-1
10. RWCU Area Temperature*	T 4.2-1
11. RWCU Area Ventilation Diff Temp*	T 4.2-1
12. Condenser Vacuum	T 4.2-1
13. Drywell Radiation	T 4.2-1
14. HPCI Emergency Area Cooler Amb Temp*#	T 4.2-1
15. HPCI Steam Supply Pressure*#	T 4.2-1
16. HPCI Steam Line Diff Pressure*#	T 4.2-1
17. HPCI Turbine Exhaust Diaphragm Pressure*#	T 4.2-1
18. HPCI Suppression Chamber Area Amb Temp*#	T 4.2-1
19. HPCI Supp Chamber Area Diff Air Temp*#	T 4.2-1
20. RCIC Emergency Area Cooler Amb Temp*#	T 4.2-1
21. RCIC Steam Supply Pressure*#	T 4.2-1
22. RCIC Steam Line Diff Pressure (Flow)*#	T 4.2-1
23. RCIC Turbine Exhaust Diaphragm Pressure*#	T 4.2-1
24. RCIC Supp Chamber Area Amb Temp*#	T 4.2-1
25. RCIC Supp Chamber Area Diff Air Temp*#	T 4.2-1
 <u>ECCS Instrumentation</u>	 <u>TS Location</u>
1. Reactor Vessel Water Level 2*	T 4.2-2, 4.2-3, & 4.2-9
2. Drywell Pressure*	T 4.2-2, 4.2-4, 4.2-5, & 4.2-6
3. HPCI Turbine Exhaust Pressure*	T 4.2-2
4. HPCI Pump Suction Pressure*	T 4.2-2

* ATTS Instrumentation

Moved from existing ECCS tables. (See Proposed Change Two.)

ENCLOSURE 1

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

TABLE 1 (SHEET 2 OF 2)

UNIT 1 INSTRUMENTATION WITH REVISED SURVEILLANCE FREQUENCIES

<u>ECCS Instrumentation (Continued)</u>	<u>TS Location</u>
5. Reactor Vessel Water Level B*	T 4.2-2 & 4.2-3
6. HPCI Pump Discharge Flow*	T 4.2-2
7. HPCI Condensate Storage Tank Level	T 4.2-2
8. HPCI Suppression Chamber Water Level*	T 4.2-2
8. RCIC Turbine Exhaust Pressure*	T 4.2-3
9. RCIC Pump Suction Pressure*	T 4.2-3
10. RCIC Pump Discharge Flow*	T 4.2-3
11. RCIC Condensate Storage Tank Level	T 4.2-3
12. RCIC Suppression Pool Water Level	T 4.2-3
13. Reactor Vessel Water Level 3*	T 4.2-4
14. Reactor Vessel Water Level 1*	T 4.2-4, 4.2-5 & 4.2-6
15. Rx Vessel Stm Dome Press - Vly Closure*	T 4.2-5
16. RHR Pump Discharge Pressure*	T 4.2-4
17. CS Pump Discharge Pressure*	T 4.2-4
18. Reactor Vessel Steam Dome Press - Inj*	T 4.2-5 & 4.2-6
19. Reactor Shroud Water Level 0*	T 4.2-5
20. RHR (LPCI) Pump Flow*	T 4.2-5
21. CS Pump Discharge Flow*	T 4.2-6
22. Filled Discharge Pipes Level Switches	S 4.5.H.4

Control Rod Block

APRM - Downscale	T 4.2-7
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LEGEND:

T = Table
S = Specification

* ATTS Instrumentation

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:

INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

TABLE 2 (SHEET 1 OF 2)

UNIT 2 INSTRUMENTATION WITH REVISED SURVEILLANCE FREQUENCIES

<u>Isolation Actuation Instrumentation</u>	<u>TS Location</u>
1. Reactor Vessel Water Level 3*	T 4.3.2-1
2. Reactor Vessel Water Level 2*	T 4.3.2-1
3. Reactor Vessel Water Level 1*	T 4.3.2-1 & 4.3.6.7-1
4. Drywell Pressure - High*	T 4.3.2-1 & 4.3.6.7-1
5. Main Steam Line Pressure - Low*	T 4.3.2-1
6. Main Steam Line Flow - High*	T 4.3.2-1 & 4.3.6.7-1
7. Main Steam Line Tunnel Temp - High*	T 4.3.2-1
8. Condenser Vacuum - Low	T 4.3.2-1
9. Drywell Radiation - High	T 4.3.2-1
10. Reactor Bldg Exhaust Radiation - High	T 4.3.2-1
11. Refueling Floor Exh Radiation - High	T 4.3.2-1
12. RWCU Diff Flow - High*	T 4.3.2-1
13. RWCU Area Temp High*	T 4.3.2-1
14. RWCU Area Diff Temp - High*	T 4.3.2-1
15. HPCI Steam Line Flow - High*	T 4.3.2-1
16. HPCI Steam Supply Pressure - Low*	T 4.3.2-1
17. HPCI Turbine Exh Diaphragm Press - High*	T 4.3.2-1
18. HPCI Pipe Penetration Rm Temp - High*	T 4.3.2-1
19. HPCI Supp Pool Area Amb Temp - High*	T 4.3.2-1
20. HPCI Supp Pool Area Diff Temp - High*	T 4.3.2-1
21. RCIC Supp Pool Area Amb Temp - High*	T 4.3.2-1
22. RCIC Supp Pool Area Diff Temp - High*	T 4.3.2-1
23. RCIC Steam Line Flow - High*	T 4.3.2-1
24. RCIC Steam Supply Pressure - Low	T 4.3.2-1
25. RCIC Turbine Exh Diaphragm Press - High*	T 4.3.2-1
26. Reactor Steam Dome Pressure - High*	T 4.3.2-1
27. HPCI Emerg Area Cooler Temp - High*	T 4.3.2-1
28. RCIC Emerg Area Cooler Temp - High*	T 4.3.2-1
29. Turbine Bldg Area Temp - High	T 4.3.2-1

* ATTS Instrumentation

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

TABLE 2 (SHEET 2 OF 2)

UNIT 2 INSTRUMENTATION WITH REVISED SURVEILLANCE FREQUENCIES

<u>ECCS Instrumentation</u>	<u>TS Location</u>
1. Reactor Vessel Water Level 1*	T 4.3.3-1
2. Drywell Pressure - High*	T 4.3.3-1
3. Reactor Stm Dome Pressure - Low (Closure)*	T 4.3.3-1
4. Reactor Shroud Water Level 0*	T 4.3.3-1
5. Reac Stm Dome Pressure - Low (Injection)*	T 4.3.3-1
6. Reactor Vessel Water Level 2*	T 4.3.3-1 & 4.3.4-1
7. HPCI Condensate Storage Tank Level - Low	T 4.3.3-1
8. HPCI Supp Chamber Water Level - High*	T 4.3.3-1
9. Reactor Vessel Water Level 8*	T 4.3.3-1
10. Reactor Vessel Water Level 3*	T 4.3.3-1
11. CS Pump Discharge Pressure - High*	T 4.3.3-1
12. RHR Pump Discharge Pressure - High*	T 4.3.3-1
13. RCIC Condensate Storage Tank Level - Low	T 4.3.4-1
14. RCIC Supp Chamber Water Level - High	T 4.3.4-1
 <u>Control Rod Block</u>	
APRM - Downscale	T 4.3.5-1

LEGEND:

T = Table
S = Specification

* ATTS Instrumentation

ENCLOSURE 1 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

BASIS FOR CHANGE REQUEST

TABLE 3

UNIT 1 ISOLATION ACTUATION INSTRUMENTATION

<u>Instrument</u>	<u>Current Table Location*</u>
HPCI Emergency Area Cooler Ambient Temp	3.2-2
HPCI Steam Supply Pressure	3.2-2
HPCI Steam Line Differential Pressure	3.2-2
HPCI Turbine Exhaust Diaphragm Pressure	3.2-2
HPCI Suppression Chamber Area Ambient Temp	3.2-2
HPCI Suppression Chamber Area Diff Air Temp	3.2-2
RCIC Emergency Area Cooler Ambient Temp	3.2-3
RCIC Steam Supply Pressure	3.2-3
RCIC Steam Line Diff Pressure	3.2-3
RCIC Turbine Exhaust Diaphragm Pressure	3.2-3
RCIC Suppression Chamber Area Ambient Temp	3.2-3
RCIC Suppression Chamber Area Diff Air Temp	3.2-3
Reactor Vessel Steam Dome Pressure	3.2-5

* LCO table identified only. Same change noted on SR tables and associated Bases.

ENCLOSURE 2

EDWIN I HATCH NUCLEAR PLANT - UNITS 1,2
NRC DOCKET 50-321 AND 50-366
OPERATING LICENSES DPR-57 AND NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

10 CFR 50.92 EVALUATION

PROPOSED CHANGE ONE:

As discussed in Enclosure 1, this proposed change revises the ECCS, rod block and isolation actuation instrumentation channel functional test frequencies from monthly to quarterly. This change also provides for extended AOTs for surveillance (6 hours) and repair (12 hours), with one or more channels of one subsystem removed from service. The affected instrumentation for Units 1 and 2 is supplied in Tables 1 and 2, respectively, of Enclosure 1.

Basis for Proposed Change One:

Georgia Power Company (GPC) has reviewed the proposed change and determined it does not involve a significant hazards consideration based on the following:

1. This change does not involve a significant increase in the probability or consequences of an accident. GE Topical Reports NEDC-30936P-A, NEDC-30851P-A (Supplement 1), NEDC-31677P-A and GENE-770-06-1 provide a probabilistic basis for extending ECCS, rod block and isolation actuation instrumentation surveillance intervals. These reports have been generically endorsed by the NRC, except for the GENE-770-06-1 report, which is still under NRC review. Adoption of these enhancements will provide a more consistent and correct system of ECCS, rod block and isolation actuation surveillances for both Plant Hatch units. GPC has reviewed Plant Hatch's specific design and determined the GE Topical Reports envelope the Plant Hatch design. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident.
2. The possibility of a different kind of accident from any analyzed previously is not created by this change, since no change is being made to degrade the design, operation, or maintenance of the plant and a new mode of failure is not created.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

10 CFR 50.92 EVALUATION

3. The proposed change does not involve a significant reduction in a margin of safety, since the referenced GE Topical Reports provide results indicating the requested interval extensions will not negatively affect the functional capability or reliability of the affected systems. Also, GPC has determined existing setpoint calculations for the affected instrumentation will not be affected by these changes.

PROPOSED CHANGE TWO:

As discussed in Enclosure 1, this proposed change moves the instrumentation, which initiates isolation of HPCI, RCIC, and the Low Pressure Coolant Injection (LPCI) mode of RHR, from Plant Hatch Unit 1 LCO TS Tables 3.2-2, 3.2-3, and 3.2-5 (and their corresponding surveillance tables) to Unit 1 LCO Table 3.2-1 and surveillance Table 4.2-1. Also, for clarity, Unit 1 Tables 3.2-1 and 4.2-1 have been renamed to indicate the isolation actuation function, and the Table of Contents has been revised and reorganized to reflect these changes.

Basis for Proposed Change Two:

Georgia Power Company has reviewed the proposed change and determined it does not involve a significant hazards consideration based on the following:

1. The change does not involve a significant increase in the probability or consequences of an accident, since the change is consistent with the GE BWR-4 STS and the Plant Hatch Unit 2 TS. No physical change to the facility or its operating parameters is being made. This change will clarify the identification of the isolation actuation instrumentation.
2. The proposed change does not create the possibility of a different kind of accident from any analyzed previously, since moving the instrumentation which initiates isolation of the ECCS systems does not degrade the design, operation, or maintenance of the plant and a new mode of failure is not created.
3. Margins of safety are not significantly reduced by the proposed change, since moving the affected instrumentation to Unit 1 Table 3.2-1 will result in a more appropriate application of the Action Statements.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

10 CFR 50.92 EVALUATION

Also, the proposed change will result in the Plant Hatch Unit 1 TS Action Statements being more consistent with the GE BWR-4 STS and the Plant Hatch Unit 2 TS. Therefore, incorporating this change will not significantly reduce any margin of safety.

PROPOSED CHANGE THREE:

This proposed change adds the following note to certain instrumentation tables and specifications (as in the case of ECCS, rod block and isolation actuation instrumentation as discussed in Proposed Change One in Enclosure 1) in both units of the Plant Hatch TS:

One instrument channel may be inoperable for up to 6 hours to perform required Surveillances prior to entering other applicable Actions.

As discussed in Enclosure 1, the amount of time provided in the note depends on the normal amount of time required to perform the associated maintenance. The proposed revised tables and specifications are listed in Enclosure 1.

Basis for Proposed Change Three:

Georgia Power Company has reviewed the proposed change and determined it does not involve a significant hazards consideration based on the following:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident, because the proposed surveillances are already necessary to comply with TS, and adoption of this change merely provides for a reasonable AOT for the surveillance to be performed. Removal of this instrumentation from service for surveillance has been shown to have no effect on the probability of an accident and an insignificant effect on the consequences of an accident. For these reasons, the response of the plant to previously evaluated accidents will remain unchanged.
2. The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated, since no change is being made to degrade the design, operation, or maintenance of the plant. No new modes of failure are created.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

10. CFR 50.92 EVALUATION

3. Margins of safety are not significantly reduced, since the proposed change maintains reasonable AOTs for the instrumentation to perform design functions. In addition, the proposed change provides for conditions of operation which will preserve the ability of the system to perform its intended function even during periods when instrument channels may be out of service for maintenance. Therefore, the proposed change does not reduce any margin of safety.

PROPOSED CHANGE FOUR:

As discussed in Enclosure 1, minor changes to the RPS instrumentation surveillances have been proposed in order to further incorporate the improvements presented in GE Topical Report NEDC-30851P-A.

Basis for Proposed Change Four:

Georgia Power Company has reviewed the proposed change and determined it does not involve a significant hazards consideration based on the following:

1. The proposed change does not involve a significant increase in the probability or consequences of an accident, since the change is bounded by the NRC SER for methodology of NEDC-30851P-A. In addition, due to less frequent testing of the RPS, there are fewer challenges to the safeguards system. This conservatively results in a decrease in core damage frequency. Also, since the cumulative effect of instrumentation tests does result in some radiation exposure, an increase in the required surveillance intervals would represent a savings in potential exposure.
2. The possibility of a different kind of accident from any analyzed previously is not created, since the RPS functions and reliabilities are not degraded by this change. Also, no new modes of plant operation are involved.
3. Margins of safety are not significantly reduced, since the change has been evaluated and found acceptable by the NRC and is bounded by the generic SER.

ENCLOSURE 2 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

10 CFR 50.92 EVALUATION

PROPOSED CHANGE FIVE:

This proposed change will incorporate minor editorial corrections made to various TS for both Plant Hatch units.

Basis for Proposed Change 5:

Georgia Power Company has reviewed the proposed change and determined it does not involve a significant hazards considerations based on the following:

1. This change does not involve a significant increase in the probability or consequences of an accident, since the plant analytical limits will remain unchanged. The changes are only editorial in nature and do not constitute any technical change to the TS.
2. The possibility of a different kind of accident from any analyzed previously is not created by this change, since no system function or reliability is being degraded. No new modes of plant operation are involved.
3. The proposed change does not involve a significant reduction in a margin of safety, since the change is editorial in nature. Safety analysis assumptions and equipment performance are not changed in any way.

ENCLOSURE 3

EDWIN I. HATCH NUCLEAR PLANT - UNITS 1, 2
NRC DOCKETS 50-321, 50-366
OPERATING LICENSES DPR-57, NPF-5
REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

PAGE CHANGE INSTRUCTIONS

The proposed changes to the Plant Hatch Units 1 and 2 Technical Specifications will be incorporated as follows:

	<u>Page</u>	<u>Instruction</u>
UNIT 1	i	Replace
	vii	Replace
	viii	Replace
	3.1-6	Replace
	3.1-15	Replace
	3.1-16	Replace
	3.1-17	Replace
	3.1-18	Replace
	Figure 4.1-1	Replace
	3.2-1	Replace
	3.2-2	Replace
	3.2-3a	Add
	3.2-3b	Add
	3.2-4	Replace
	3.2-5	Replace
	3.2-6	Replace
	3.2-7	Replace
	3.2-8	Replace
	3.2-9	Replace
	3.2-9a	Replace
	3.2-10	Replace
	3.2-11	Replace
	3.2-14	Replace
	3.2-16a	Replace
	3.2-17	Replace
	3.2-19	Replace
	3.2-20	Replace
	3.2-21	Replace

ENCLOSURE 3 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

PAGE CHANGE INSTRUCTIONS

	<u>Page</u>	<u>Instruction</u>
UNIT 1	3.2-23	Replace
	3.2-23a	Replace
	3.2-23b	Replace
	3.2-23c	Replace
	3.2-23d	Replace
	3.2-24	Replace
	3.2-25	Replace
	3.2-25a	Add
	3.2-26	Replace
	3.2-27	Replace
	3.2-28	Replace
	3.2-29	Replace
	3.2-30	Replace
	3.2-31	Replace
	3.2-33	Replace
	3.2-35	Replace
	3.2-38	Replace
	3.2-40	Replace
	3.2-42	Replace
	3.2-43	Replace
	3.2-45	Replace
	3.2-46	Replace
	3.2-47	Replace
	3.2-49c	Replace
	3.2-50	Replace
	3.2-52	Replace
	3.2-52a	Add
	3.2-52b	Add
	3.2-53	Replace
	3.2-54	Replace
	3.2-55	Replace
	3.2-56	Replace
	3.2-57	Replace
	3.2-60	Replace
	3.2-69	Replace
	3.2-70	Replace

ENCLOSURE 3 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

PAGE CHANGE INSTRUCTIONS

	<u>Page</u>	<u>Instruction</u>
UNIT 1	3.2-71	Replace
	Figure 4.2-1	Replace
	3.5-11	Replace
	3.6-9	Replace
	3.6-9a	Replace
	3.9-4	Replace
	3.14-1	Replace
	3.14-9	Replace
	3.14-10	Replace

ENCLOSURE 3 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

PAGE CHANGE INSTRUCTIONS

	<u>Page</u>	<u>Instruction</u>
UNIT 2	3/4 1-8	Replace
	3/4 1-17	Replace
	3/4 3-1	Replace
	3/4 3-5	Replace
	3/4 3-5a	Add
	3/4 3-9	Replace
	3/4 3-9a	Add
	3/4 3-15	Replace
	3/4 3-15a	Add
	3/4 3-21	Replace
	3/4 3-22	Replace
	3/4 3-23	Replace
	3/4 3-24	Replace
	3/4 3-31	Replace
	3/4 3-32	Replace
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	3/4 3-47	Replace
	3/4 3-50	Replace
	3/4 3-53	Replace
	3/4 3-54	Replace
	3/4 3-56	Replace
	3/4 3-56a	Add
	3/4 3-58	Replace
	3/4 3-58b	Replace
	3/4 3-58d	Replace
	3/4 3-60a	Replace
	3/4 3-60f	Replace
	3/4 3-63	Replace
	3/4 3-66	Replace
	3/4 3-66a	Replace

ENCLOSURE 3 (Continued)

REQUEST TO REVISE TECHNICAL SPECIFICATIONS:
INSTRUMENTATION SURVEILLANCE REQUIREMENTS

PAGE CHANGE INSTRUCTIONS

	<u>Page</u>	<u>Instruction</u>
UNIT 2	3/4 3-70	Replace
	3/4 3-72	Replace
	3/4 3-75	Replace
	3/4 4-4	Replace
	3/4 4-4a	Replace
	3/4 4-5	Replace
	3/4 5-4	Replace
	3/4 5-10	Replace
	3/4 6-12	Replace
	3/4 9-3	Replace
	B 3/4 3-1	Replace