

April 19, 2000

Mr. Michael B. Sellman
Senior Vice President and
Chief Nuclear Officer
Wisconsin Electric Power Company
231 West Michigan Street
Milwaukee, WI 53201

SUBJECT: POINT BEACH NUCLEAR POWER PLANT, UNITS 1 AND 2 - REQUEST FOR
ADDITIONAL INFORMATION RE: SECTION 3.6 OF IMPROVED TECHNICAL
SPECIFICATIONS CONVERSION (TAC NOS. MA7186 AND MA7187)

Dear Mr. Sellman:

By letter dated November 15, 1999, the Wisconsin Electric Power Company submitted a license amendment request to convert the current Technical Specifications to improved Technical Specifications for Point Beach, Units 1 and 2.

The enclosed request was discussed with Mr. Jack Gadzala and other members of your staff during a conference call on March 23, 2000. A mutually agreeable target date of 60 days from the date of this letter for your response was established. If circumstances result in the need to revise the target date, please contact me at (301) 415-1355 at the earliest opportunity.

Sincerely,

/RA/

Beth A. Wetzel, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosure: Request for Additional Information

cc w/encl: See next page

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ACCESSION NO. ML003705120

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Point Beach Nuclear Plant, Units 1 and 2

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November 1999

REQUEST FOR ADDITIONAL INFORMATION

IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.6

3.6.1 Containment

- 3.6.1-1 DOC A.1
- DOC A.3
- DOC A.4
- JFD 8
- CTS 1.D
- ITS 3.6.1 and Associated Bases
- ITS 3.6.2
- ITS 3.6.3

CTS 1.D defines CONTAINMENT INTEGRITY. A markup of CTS 1.D shows that the requirements of CTS 1.D.1, 1.D.3 and a portion of 1.D.4 are relocated to ITS 3.6.2 and 3.6.3 by DOCs A.1. and A.4. The rest of CTS 1.D is incorporated into ITS LCO 3.6.1 and SR 3.6.1.1, and is covered by DOCs A.3 and A.4. While these changes are acceptable with regards to the Administrative changes made to CTS 1.D, the changes made to CTS 1.D are incomplete. The definition is relocated in its entirety to ITS B3.6.1 Bases BACKGROUND which makes this portion of the change a Less Restrictive (LA) change. See Comment Number 3.6.1.-2. Comment: Revise the CTS markup of CTS 1.D and provide a discussion and justification for this Less Restrictive (LA) change.

WEPC Response:

ENCLOSURE

3.6.1-2 DOC A.4
 DOC A.2 (Section 3.6.3)
 JFD 7
 JFD 8
 CTS 1.D.2
 ITS SR 3.6.1.1
 ITS B3.6.1 Bases - BACKGROUND
 ITS LCO 3.6.2 and Associated Bases
 ITS SR3.6.3.3 and Associated Bases

CTS 1.D defines CONTAINMENT INTEGRITY. A markup of CTS 1.D.2 shows that this requirement is incorporated into ITS SR 3.6.1.1, but does not show that it has been relocated to ITS B3.6.1 Bases - BACKGROUND (See Comment Number 3.6.1-1). In addition CTS 1.D.2 states that the equipment hatch is properly closed. ITS B3.6.1 Bases -BACKGROUND states the following: "To maintain this leak tight barrier: c. The equipment hatch is installed". The CTS markup does not provide a justification for this change - "properly closed" to "installed". DOC A.4 states that proper closure/installation is assured by ITS SR 3.6.1.1 while JFD 8 states that this is covered by ITS LCO 3.6.2. JFD 8 also states that Point Beach only has "a single containment equipment hatch which incorporates an airlock as well." Furthermore, the markup of CTS 1.D.2 in Section 3.6.3 shows that this requirement is covered by ITS SR 3.6.3.3, and justified by DOC A.2 in Section 3.6.3. The staff cannot determine based on the DOCs and JFDs whether this change "properly closed" to "installed" is an acceptable change and whether the change is an Administrative, More Restrictive or Less Restrictive (L) change. It is also unclear if the equipment hatch is an airlock, a small airlock within the overall larger equipment hatch, or a manual valve/blind flange. In addition, it is unclear which specification applies ITS SR 3.6.1.1, SR 3.6.2.1, or SR3.6.3.3 since except for the discussion in ITS B3.6.1. Bases - BACKGROUND, there is no mention of the equipment hatch in the Bases discussions associated with ITS 3.6.2 and 3.6.3. Typically the equipment hatch is covered under ITS SR3.6.1.1. Also "installed" does not connote or imply "properly closed;" the hatch could be installed but not properly closed or sealed. See Comment Number 3.6.1-3.

Comment: Revise the CTS and ITS markups as appropriate to correct this discrepancy and provide additional discussion and justification for this change based on the current licensing basis. See Comment Numbers 3.6.1-1 and 3.6.1-3.

WEPC Response:

3.6.1-3 DOC A.4
 DOC A.2 (Specification 3.6.3)
 JFD 7
 JFD 8
 CTS 1.D.2
 STS B 3.6.1 Bases - BACKGROUND and LCO
 ITS B 3.6.1 Bases - BACKGROUND and LCO

CTS 1.D.2 states that “Containment Integrity is defined to exist when: 2) The equipment hatch is properly closed.” STS B 3.6.1 Bases - BACKGROUND and ITS B 3.6.1 Bases - BACKGROUND states that “To maintain this leak tight barrier: c. The equipment hatch is “closed/installed. See Comment Number 3.6.1-2 for concern on “closed” versus” “installed”. STS B 3.6.1 Bases - LCO states that “Compliance with this LCO will ensure a containment configuration including equipment hatches that is” ITS B 3.6.1 Bases - LCO deletes the phrase “including equipment hatches” and justifies the deletion by JFD 7. Based on the discussion in Comment Number 3.6.1-2 it is unclear if the equipment hatch is an airlock, a small airlock that is part of the larger equipment hatch or a manual valve/blind flange. If it is the first item then the deletion is acceptable; however, if it is the latter items then the deletion is unacceptable. The LCO Bases discussion defines or describes what constitutes an OPERABLE system, component or structure. In the latter case, the equipment hatch is a large opening in containment which is not covered by any other STS/ITS 3.6. LCO. Thus it needs to be specified in the LCO Bases as part of what constitutes or is included in containment OPERABILITY.

Comment: Based on the resolution of Comment Number 3.6.1-2 revise the ITS markup accordingly.

WEPC Response:

3.6.1-4 DOC A.9
 CTS 3.6 OBJECTIVE
 CTS 4.4 OBJECTIVE
 ITS B3.6.1 Bases

CTS 3.6 OBJECTIVE and CTS 4.4 OBJECTIVE provide an introductory statement of the purpose of these Technical Specifications Sections. DOC A.9 states that this information is contained in the Bases section of ITS 3.6. Based on this statement the change is a Less Restrictive (LA) change - relocation to a licensee controlled document, not an Administrative change.

Comment: Revise the CTS markup and DOC A.9 to show the change as a Less Restrictive (LA) change.

WEPC Response:

3.6.1-5 JFD 3
 CTS 1.D.4
 CTS 3.6.E
 CTS 4.4.I
 STS SR 3.6.1.1 and Associated Bases
 ITS SR 3.6.1.1 and Associated Bases

CTS 1D.4, 3.6.E and 4.4.I require leak rate testing in accordance with the Containment Leak Rate Testing Program which is based on the requirements of 10 CFR 50 Appendix J, Option B. STS SR 3.6.1.1 requires the visual examination and leakage rate testing be performed in accordance with 10 CFR 50 Appendix J as modified by approved exemptions. ITS SR 3.6.1.1 modifies STS SR 3.6.1.1 to conform to CTS 1.D.4, 3.6.E and 4.4.I as modified in the CTS markup. The STS is based on Appendix J, Option A while the CTS and ITS are based on Appendix J, Option B. Changes to the STS with regards to Option A versus Option B are covered by a letter from Mr. Christopher I. Grimes to Mr. David J. Modeen, NEI, dated 11/2/95 and TSTF - 52, as modified by staff comments of 10/96, 12/98, and 1/2000. The changes to ITS 3.6.1., 3.6.2, and their associated Bases are not in conformance with the letter and TSTF-52 as modified by staff comments. See Comment Numbers 3.6.1-6, 3.6.1-7, 3.6.2-1, and 3.6.2-2.

Comment: Licensee should revise its submittal to conform to the 11/2/95 letter and TSTF-52 modified by the staff. See Comment Numbers 3.6.1-6, 3.6.1-7, 3.6.2-1 and 3.6.2-2.

WEPC Response:

- 3.6.1-6 JFD 3
 - CTS Bases for 3.6.A.1 and 4.4
 - STS B 3.6.1 Bases - BACKGROUND, APPLICABLE SAFETY ANALYSES AND APPLICABILITY
 - ITS B 3.6.1 Bases -BACKGROUND, APPLICABLE SAFETY ANALYSES AND APPLICABILITY
 - ITS B 3.6.2 Bases - BACKGROUND Insert B 3.6.2-1

ITS B 3.6.1 Bases - BACKGROUND, APPLICABLE SAFETY ANALYSES and APPLICABILITY changes the STS B 3.6.1 Bases - BACKGROUND, APPLICABLE SAFETY ANALYSES and APPLICABILITY references and discussions to "Design Basis Accident (DBA)" and "DBA" to "Design Basis Loss of Coolant Accident." While some of these changes are acceptable based on TSTF-52 (See Comment Number 3.6.1-5) and the CTS Bases discussions in 3.6.A.1 and 4.4, some of the other changes do not conform to TSTF-52 or the discussions in the CTS Bases for 4.4 and ITS B3.6.2 Bases - BACKGROUND Insert B3.6.2-1. The Bases discussions for CTS 3.6.A.1 states that the safety design basis for the containment is the Design Basis Loss of Coolant Accident. However, the Bases discussion for CTS 4.4 and ITS B 3.6.2 Bases - BACKGROUND Insert B 3.6.2-1 talks about and implies that the design basis for containment is based not only on a Design Basis Loss of Coolant Accident but other DBAs. Comment: Provide a discussion and justification delineating these other DBAs, and why they are not required to be included in the ITS 3.6 Bases discussion as specified in the TSTF-52 changes. See Comment Number 3.6.1-5.

WEPC Response:

- 3.6.1-7 JFD 3
STS B3.6.1 Bases - LCO and SR 3.6.1.1
ITS B 3.6.1 Bases - LCO and SR 3.6.1.1

ITS B 3.6.1 Bases - LCO and SR 3.6.1.1 modifies the STS B3,6,1 Bases - LCO and SR 3.6.1.1 wording by adding two new phrases. The phrase "limiting minimum pathway leakage" is added to the first sentence of ITS B 3.6.1 Bases - LCO and the phrase "combined Type B and C maximum pathway leakage" is added to ITS B 3.6.1 Bases - SR 3.6.1.1. These phrases are not part of the overall TSTF-52 changes (See Comment Number 3.6.1-5), are not contained in 10 CFR 50 Appendix J Option A or Option B, cannot be found in the CTS specifications (LCO, surveillances or Bases), and are not contained in the Safety Evaluation associated with Amendments 169 and 173 to Point Beach Units 1 and 2, respectively which approved 10 CFR 50 Appendix J Option B for the plant. No justification is provided for the addition of these phrases and the changes could have a potential generic implication.

Comment: Delete these generic changes. See Comment Number 3.6.1-5.

WEPC Response:

3.6.2 Containment Air Locks

- 3.6.2-1 JFD 4
JFD 9
JFD 10
CTS 1.D.4
CTS 4.4.1
STS SR 3.6.2.1 and Associated Bases
ITS SR 3.6.2.1 and Associated Bases

See Comment Number 3.6.1-5.

Comment: See Comment Number 3.6.1-5.

WEPC Response

3.6.2-2 JFD 4
JFD 10
CTS Bases for 3.6.A.1 and 4.4
STS B3.6.2 Bases - BACKGROUND, APPLICABLE SAFETY ANALYSES AND
APPLICABILITY
ITS B3.6.2 Bases - BACKGROUND, APPLICABLE SAFETY ANALYSES and
APPLICABILITY

See Comment Number 3.6.1-5 and 3.6.1-6.

Comment: See Comment Number 3.6.1-5 and 3.6.1-6.

WEPC Response:

3.6.2-3 JFD 11
CTS 3.6.A.1.d and Associated Bases
STS 3.6.2 ACTION Note 1 and Associated Bases
ITS 3.6.2 ACTION Note 1 and Associated Bases

ITS B3.6.2 Bases - ACTIONS has modified the STS discussion of ACTION Note 1 by the addition of the following words to the second to last sentence of the first paragraph: "but is not required to be locked while repairs are being performed on the inoperable bulkhead." While the STS wording implies that while working on an inoperable airlock door, entry and exit is permissible without requiring the locking of the OPERABLE door while the personnel are actively working on the inoperable door. The ITS modification would also allow this, however, the proposed modification has generic implications. It would also allow the OPERABLE door to remain unlocked indefinitely as long as the air lock is considered under repair even though no work is being done. This was not the intent of the Note or the specification. In addition, the CTS Bases for CTS 3.6.A.1.d which has the same Note does not include this change.

Comment: Delete this generic change.

WEPC Response:

3.6.3 Containment Isolation Valves

3.6.3-1 DOC A.2
 CTS 1.D.2
 ITS SR 3.6.3.3 and Associated Bases

See Comment Numbers 3.6.1-2 and 3.6.1-3.
Comment: See Comment Numbers 3.6.1-2 and 3.6.1-3.

WEPC Response:

3.6.3-2 DOC A.2
 DOC M.1
 JFD 8
 JFD 16
 CTS 1.D.1
 CTS 4.2.B.3
 CTS Table 15.4.1-2 Item 13
 STS SR 3.6.3.5, SR 3.6.3.8 and Associated Bases
 ITS SR 3.6.3.4 and Associated Bases

The CTS markup of CTS 1.D.1 and Table 15.4.1-2 item 13 shows that these two requirements are covered by ITS SR 3.6.3.4. The CTS markup of CTS 4.2.B.3 does not show to which ITS SR this CTS requirement corresponds. See Comment Number 3.6.3-3 for additional concerns with regards to this CTS requirement. DOC A.2 states that the OPERABILITY of the automatic containment isolation valves is addressed by ITS SRs 3.6.3.4 and 3.6.3.5. Based on the discussion in DOC A.2, ITS SR 3.6.3.4 corresponds to STS 3.6.3.5 and ITS SR 3.6.3.5 corresponds to STS SR 3.6.3.8. The ITS markup shows that STS 3.6.3.5 is deleted by JFDs 8 and 16, while STS 3.6.3.8 is labeled ITS 3.6.3.4. There is an inconsistency between the CTS markup, ITS markup, DOCs and JFDs.

Comment: Correct this discrepancy. See Comment Number 3.6.3-3.

WEPC Response:

3.6.3-3 DOC A.2
 JFD 8
 JFD 16
 CTS 1.D.1
 CTS 4.2.B.3
 CTS Table 15.4.1-2 Item 13
 STS SR 3.6.3.5 and Associated Bases

The CTS markup of CTS 4.2.B.3 shows the portion associated with pumps and snubbers as being relocated to ITS Section 5.0. This is acceptable. However, the aspects of CTS 4.2.B.3 relating to containment isolation valves is shown to be retained in ITS 3.6.3; however, no ITS SR is associated with this requirement. DOC A.2 states that the ITS will contain a SR to verify isolation stroke time testing. See Comment Number 3.6.3-2 for concern on markup/justification discrepancies. JFD 16 states that "The isolation time of each automatic power operated containment isolation [valve] is fulfilled by performance of ASME Section XI stroke time testing..." JFD 16 deletes STS SR 3.6.3.5 (containment isolation valve isolation time testing) from the ITS, based on a number of justifications. The staff has reviewed these justifications and finds they are unacceptable. The staff finds that the CTS currently requires a containment isolation valve stroke/isolation time testing through CTS 1.D.1 (penetrations capable of being closed by an OPERABLE automatic containment isolation valve which means it will close within its design closure time), CTS Table 15.4.1-2, Item 13 (a functioning test of containment isolation trip which implies a response time type of test to assure closure) and CTS 4.2.B.3 (The stroke time testing required by ASME Section XI). Therefore, STS SR 3.6.3.5 as modified by TSTF-46 or a modification based on the CTS requirements above needs to be included in the ITS. In addition the various ITS B3.6.3 Bases Sections that were deleted or modified to reflect the deletion of the isolation time requirement, need to be retained or modified in light of the retention of STS SR 3.6.3.5.

Comment: Revise the ITS markup to include STS SR 3.6.3.5 as modified by TSTF-46 or a modification thereof, and the associates Bases, and provide any appropriate discussions and justifications. See Comment Number 3.6.3-2.

WEPC Response:

3.6.3-4 JFD 13
CTS 3.6.A.1.c
STS B3.6.3 Bases - APPLICABLE SAFETY ANALYSES
ITS SR 3.6.3.1 and Associated Bases

The second paragraph of STS B3.6.3 Bases - APPLICABLE SAFETY ANALYSES states the following: "This ensures that the potential paths to the environment through the containment isolation valves (including containment purge valves) are minimized. The safety analyses... closed at event initiation." ITS B3.6.3 modifies these statements by deleting "(including containment purge valves)" and the entire last sentence. The justification for this deletion JFD 13 states that the purge valves are not rated to close under DBA conditions and the accident analysis does not explicitly assume the purge valves are closed. Based on CTS 3.6.A.1.c and ITS SR 3.6.3.1 and its associated Bases, it would seem that the current licensing basis and thus the accident analysis associated with it requires or assumes that the purge valves are locked closed at event initiation. Therefore, these STS statements would apply to Point Beach. Comment: Revise the ITS markup to retain these STS statements or modify them to reflect the plant's current licensing basis.

WEPC Response:

3.6.3-5 JFD 16
JFD 17
ITS B3.6.3 Bases

There are a number of statements in the various ITS B3.6.3 Bases Sections which describe and discuss “non-essential penetrations” and the containment isolation valves associated with them. The implication of these statements is that ITS 3.6.3 only applies to non-essential penetrations. The CTS Bases also uses this terminology and implies that it only applies to non-essential penetrations. No mention is made in the CTS Bases or in ITS B3.6.3 Bases on essential penetrations. There is also the implication, based on ITS B3.3.3 Bases - SR 3.6.3.4 that all non-essential penetrations contain automatic valves, which may or may not be true. The CTS and the ITS do not differentiate the penetrations except in the Bases write-ups. The staff does not differentiate essential versus non-essential penetrations in the STS. All containment penetrations are required to have isolation valves whether the valves are required to be closed during accident conditions depends on the accident, and the valve OPERABILITY as defined by the SRs and ACTION statements. Some containment isolation valves may be required to be closed under certain accident conditions while required to be open under other accident conditions. Based on the CTS, the proposed ITS, the structure and wording of the STS, and other similar plant TS, the staff concludes that the CTS, and thus the ITS apply to all penetrations both essential and non-essential.

Comment: Revise the ITS Bases to remove the terminology or implication that the specification only applies to “non-essential penetrations”.

WEPC Response:

3.6.3-6 JFD 17
STS B3.6.3 Bases - SR 3.6.3.8
ITS B3.6.3 Bases - SR 3.6.3.4

The third sentence in STS B3.6.3 Bases - SR 3.6.3.8 states the following: "This surveillance is not required for valves... secured in the required position under administrative controls." ITS B3.6.3 Bases - SR 3.6.3.4 modifies this sentence by changing "secured in the required position" to "secured in the closed position". The STS does not differentiate on whether the valve is secured open or closed as long as it is locked, sealed or secured in its required position (open or closed) it does not have to be tested in accordance with the SR. By specifying the closed position in the ITS, then all valves secured in the open position would be required to be tested in accordance with the SR. This would require unlocking, unsealing or un-securing the valve, verifying it closes on an isolation signal, opening the valve, verifying it closes on an isolation signal, opening the valve and then locking, sealing or securing it in this position. This was not the intent of the Staff or the OGS in developing the STS.

Comment: Delete this change.

WEPC Response:

3.6.3-7 JFD 19
ITS B3.6.3 Bases - LCO

The third paragraph of ITS B3.6.3 Bases - LCO is modified by Insert B3.6.3-7. The insert states that position verification for normally closed isolation valves "when necessary in accordance with the required actions, is still required for these valves." This sentence is incomplete; position verification is required not only by the required ACTIONS, but by the appropriate SRs. Comment: Revise the ITS insert to cover SRs as well as ACTIONS.

WEPC Response:

3.6.3-8 JFD 20
STS B3.6.3 Bases - LCO
ITS B3.6.3 Bases - LCO

The fifth paragraph in STS B3.6.3 Bases - LCO states the following: "This LCO provides assurance that the containment isolation valves and purge valves will perform...." ITS B3.6.3 Bases - LCO modifies the STS words by deleting "and purge valves" on the basis that purge valves are containment isolation valves and the words do not add any value or clarification to the statement. While the staff agrees that the purge valves are containment isolation valves, it does not agree that with the deletion justification that the words do not add any value or clarification. Based on the discussions of purge valves in the other sections of the STS and ITS and the specific Notes, SRs and ACTIONS associated with purge valves in the STS and ITS, Staff believes that the purge valves are somewhat unique from the ordinary containment isolation valve and that in this instance the words do provide an added value and clarification to the statement.

Comment: Revise the ITS markup to include these words.

WEPC Response:

3.6.3-9 CTS 3.0.B
CTS 3.6.A.1.c
ITS 3.6.3 ACTION A, and SR 3.6.3.1

CTS 3.6.A.1.c requires that the purge supply and exhaust valves be locked closed and may not be opened unless the reactor is in the cold shutdown or refueling shutdown condition. The corresponding ITS requirement is ITS SR 3.6.3.1. The only action associated with this CTS requirement is if leakage exceeds the overall containment leakage rate the actions of CTS 3.6.A.1.a apply. If the purge and exhaust valves are not locked closed or are open above cold shutdown and the leakage does not exceed the overall containment leakage rate then the CTS requires an immediate shutdown in accordance with CTS 3.0.B. In the ITS failure to meet ITS SR 3.6.3.1 for the same conditions would require entry in ITS 3.6.3 ACTION A which has a 4 hour Completion Time to isolate the penetration prior to commencement of shutdown. This is a Less Restrictive (L) change which has not been justified.

Comment: Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.

WEPC Response:

3.6.3-10 CTS 3.6.A.1.b
CTS 3.6.A.1.c
ITS 3.6.3 ACTIONS Note 2 and 3 and Associated Bases

CTS 3.6.A.1.b already contains the exceptions allowed by ITS 3.6.3 ACTIONS Notes 2 and 3. However, CTS 3.6.A.1.b does not apply to purge supply and exhaust valves. CTS 3.6.A.1.c does not contain the exceptions allowed by ITS 3.6.3 ACTIONS Notes 2 and 3, but the ITS Notes do apply to the purge supply and exhaust valves. The CTS markup does not show the addition or applicability of these Action Notes to CTS 3.6.A.1.c. The addition of these Notes to CTS 3.6.A.1.c would be a Less Restrictive (L) change to the CTS.

Comment: Revise the CTS markup to add these Notes to CTS 3.6.A.1.c and provide a discussion and justification for this Less Restrictive (L) change.

WEPC Response:

3.6.3-11 CTS 3.6.A.1.c.(2)
ITS 3.6.3 ACTIONS Note 4 and Associated Bases

CTS 3.6.A.1.c.(2) states that if containment purge penetration leakage results in exceeding the overall containment leakage rate acceptance criteria, one enters CTS 3.6.A.1.a. The CTS markup of 3.6.A.1.c.(2) shows this requirement as part of ITS 3.6.1. This is incorrect. This CTS requirement in this case is ITS 3.6.3 ACTION Note 4 with regards to purge valves. Thus the change is an Administrative change.

Comment: Revise the CTS markup and provide the necessary discussion and justification for this Administrative change.

WEPC Response:

- 3.6.3-12 CTS 3.6.A.1.b.(2)
STS 3.6.3 ACTION C and Associated Bases
ITS 3.6.3 ACTION C and Associated Bases

STS 3.6.3 ACTION C specifies the required ACTIONS to be taken for an inoperable containment isolation valve in a penetration flow path with only one containment isolation valve and a closed system. STS 3.6.3 ACTION C has been modified by TSTF 30 Rev.2 to extend the Completion Time from 4 hours to 72 hours. This modification in the CTS and ITS is in accordance with TSTF 30 which is acceptable. However, the Bases changes are not in accordance with TSTF-30 Rev.2.

Comment: Licensee to update submittal to be in accordance with TSTF - 30 Rev.2 or provide additional justification for the deviations.

WEPC Response:

- 3.6.3-13 CTS 3.6.A.1.b.(2)
STS 3.6.3 ACTIONS A, C and Associated Bases
ITS 3.6.3 ACTIONS A, C, and Associated Bases

STS 3.6.3 ACTIONS A and C specifies the required ACTIONS to be taken for an inoperable containment isolation valve. STS 3.6.3 ACTIONS A and C have been modified by TSTF 269 Rev 2 to allow verification of isolation devices that are locked, sealed, or otherwise secured to be by administrative means. This modification in the ITS and associated Bases is in accordance with TSTF 269, Rev 2 except for one minor item. The change to Require Action C.2 Notes should be "NOTES" not "Note".

Comment: Correct this minor error.

WEPC Response:

3.6.4 Containment Pressure

- 3.6.4-1 DOC A.2
- DOC A.5
- CTS 3.6 APPLICABILITY
- CTS 3.6 OBJECTIVE
- CTS 3.6.A.1
- CTS 3.6.B.2
- CTS Table 15.4.1-1 Item 27
- ITS 3.6.4 APPLICABILITY

The CTS markup of CTS 3.6.B.2 is modified to add the ITS 3.6.4 APPLICABILITY of MODES 1,2,3 and 4. This change is justified by DOC A.2 on the basis that the actions of CTS 3.6.B.2.b require the plant to be placed in COLD SHUTDOWN if the containment pressure cannot be maintained. If this were the only factor (Action statement) to take into consideration for this change, the justification probably would have been considered acceptable. However, the APPLICABILITY for containment pressure is controlled in the CTS by CTS 3.6 APPLICABILITY, 3.6 OBJECTIVE, 3.6.A.1 and Table 15.4.1-1 Item 27. The combination of CTS 3.6 APPLICABILITY, 3.6 OBJECTIVE and 3.6.A.1 would imply that the APPLICABILITY for internal pressure would be all plant conditions except the COLD SHUTDOWN and REFUELING SHUTDOWN conditions. However, CTS Table 15.4.1-1 Item 27 requires that the internal pressure requirement is applicable in "ALL" conditions. The change associated with the applicability change to CTS Table 15.4.1-1 (DOC A.5) uses the DOC A.2 justification as its basis. It should be noted that there are a number of specifications in the old and new STS which require a shutdown to COLD SHUTDOWN, but whose APPLICABILITY extends beyond COLD SHUTDOWN, e.g., Control Room Emergency Ventilation System. Based on the above discussion and the CTS, the Staff concludes that the CTS APPLICABILITY for containment pressure is all MODES/Conditions. Thus the changes (DOC A.2 and A.5) to the ITS APPLICABILITY are More Restrictive changes rather than Administrative changes. Comment: Revise the CTS markup and provide a discussion and justification for these More Restrictive changes.

WEPC Response:

3.6.4-2 JFD 2
JFD 6
CTS 3.6 Basis for Specification 15.3.6.A.1.a
CTS 4.4 Basis
CTS 6.12
ITS 5.5.X Containment Leakage Rate Testing Program
ITS B3.6.4 Bases - BACKGROUND, APPLICABLE SAFETY ANALYSES and
APPLICABILITY

CTS 3.6 Basis for Specification 15.3.6.A.1.a and CTS 4.4 Basis states that the peak calculated containment internal pressure (P_a) is 60 psig, while CTS 6.12, and ITS B3.6.4 Bases state that P_a is 53 psig. It is assumed that ITS 5.5.X Containment Leakage Rate Testing Program will conform to CTS 6.12 and state that P_a is 53 psig.

Comment: Correct this discrepancy.

WEPC Response:

3.6.4-3 CTS 3.6 APPLICABILITY
CTS 3.6 OBJECTIVE
CTS 3.6.B

The CTS markup for Containment Pressure, CTS 3.6.B is incomplete. CTS 3.6.B is part of CTS 3.6, therefore, CTS 3.6 APPLICABILITY and 3.6 OBJECTIVE need to be included as part of the markup for containment pressure. The markup can be either like the CTS markup for those sections provided for LCO 3.6.1 or LCO 3.6.2 and LCO 3.6.3.

Comment: Revise the CTS markup and provide any discussions and justification as necessary.

WEPC Response:

3.6.5 Containment Air Temperature

- 3.6.5-1 DOC A.1
 DOC M.1
 JFD 2
 CTS 4.4 Basis
 ITS LCO 3.6.5 and Associated Bases

ITS LCO 3.6.5 states that the "Containment average air temperature shall be $\leq 120^{\circ}\text{F}$." ITS B3.6.5 Bases - APPLICABLE SAFETY ANALYSES states that with the initial containment average air temperature being 120°F the resulting maximum containment air temperature due to a LOCA is 280°F . It also states that the design temperature is 286°F . This does not correlate to the Basis statements in CTS 4.4 which state that with an initial air temperature condition of 105°F the peak accident pressure and temperature is 60 psig and 286°F . The LCO is based on the limiting DBA. No explanation is provided in the JFDs to account for this discrepancy in initial conditions. The staff concludes that the LCO temperature limit should be $\leq 105^{\circ}\text{F}$ and that the proposed 120°F limit is a change in current licensing basis which is a beyond scope of review item for this conversion.

Comment: Revise the ITS to reflect the 105°F limit.

WEPC Response:

- 3.6.5-2 DOC A.1
 DOC M.1
 JFD 3
 JFD 5
 STS B3.6.5 Bases -APPLICABLE SAFETY ANALYSES
 ITS B3.6.5 Bases - APPLICABLE SAFETY ANALYSES

JFD 5 states the following: "Containment temp does exceed design temp for DBA for a short period of time as acknowledged in Amendment 174/178 of the CTS. Peak temperature will exceed design temperature for approximately 7.5 seconds. The Bases has been revised to acknowledge that peak temperature exceeds design for a very short period of time and provides reference to NRC review of this limitation." The ITS markup does not show a change associated with JFD 5. However, the STS does have a paragraph that addresses the subject in JFD 5. The paragraph is the fourth paragraph of STS B3.6.5 Bases - APPLICABLE SAFETY ANALYSES. The ITS deletes this paragraph using JFD 3.

Comment: Revise the ITS markup of ITS B3.6.5 Bases - APPLICABLE SAFETY ANALYSES to retain the fourth paragraph as modified by the discussion in JFD 5.

WEPC Response:

3.6.6 Containment Spray and Cooling Systems

3.6.6-1 DOC A.3
 CTS 3.3 OBJECTIVE
 CTS 4.5 OBJECTIVE
 ITS B3.6.6 Bases

CTS 3.3 OBJECTIVE and CTS 4.5 OBJECTIVE provide an introductory statement of the purpose of these Technical Specifications Sections. DOC A.3 states that this information is contained in the Bases section of ITS 3.6.6. Based on this statement, the change is a Less Restrictive (LA) change - relocation to a licensee controlled document, not an Administrative change.

Comment: Revise the CTS markup and DOC A.3 to show the change as a Less Restrictive (LA) change.

WEPC Response:

3.6.6-2 DOC A.9
 JFD 6
 JFD 22
 CTS 3.3.B.2.c
 ITS 3.6.3 ACTION D and Associated Bases

The markup of CTS 3.3.B.2.c specifies the remedial actions to be taken for inoperable containment spray and containment cooler valves. The corresponding ACTION in the ITS for the containment cooler valves is ITS 3.6.3 ACTION D. The ITS markup shows the addition of ITS 3.6.3 ACTION D as justified by two JFDs - JFD 6 and JFD 22. JFD 22 provides a justification for the addition of ACTION D, while JFD 6 only discusses the deletion of the General Design Criteria from ITS B3.6.3 Bases - BACKGROUND and has nothing to do with ACTION D. The JFD 6 labeling for ACTION D is associated with Insert 3.6.6-01.

Comment: Correct this discrepancy.

WEPC Response:

3.6.6-3 DOC A.9
 JFD 22
 CTS 3.3.B.2.c
 ITS 3.6.3 ACTION D and Associated Bases
 ITS SR 3.6.6.5 and Associated Bases

The markup of CTS 3.3.B.2.c specifies the remedial actions to be taken for inoperable containment spray and containment cooler valves. The corresponding action in the ITS for containment cooler valves is ITS 3.6.3 ACTION D. The addition of ITS 3.6.3 ACTION D is justified in the ITS by JFD 22. While the staff finds the addition of ITS 3.6.3 ACTION D acceptable, statements made in both the justification - JFD 22 and ITS B3.6.3 Bases - ACTION D are unacceptable. ITS B3.6.3 Bases - ACTION D states the following:

“If the inoperable valve is capable of passing 100% of the assumed cooling water flow, but is inoperable due to loss of its ability to reposition within its assumed response time (e.g., loss of auto open capability, degraded stroke time, inoperable motor operator, etc;). SR 3.6.6.4 allows the inoperable valve to be secured in its required position (open). thereby eliminating the need for the valve to reposition upon receipt of an actuation signal. Securing the inoperable valve in its open position will result in exiting Condition D.”

JFD 22 has similar wording. To start with the wrong ITS SR is referenced in the statements. ITS SR 3.6.6.4 deals with containment spray pumps, the correct SR would be ITS SR 3.6.6.5 which deals with containment spray valves and containment fan cooler service water outlet valves automatic operation. The intent of this SR is that it applies to those valves that during normal operating conditions are locked, sealed or otherwise secured in their normal operating position. Therefore the above Bases statement which states that SR 3.6.6.5 would allow the inoperable valve to be secured open is incorrect and not in accordance with the intent of the specification. Furthermore, locking the valve open does not restore the valve to OPERABLE status per the ACTION statement. The valve may be able to perform its safety function (pass water) but it is still considered inoperable; it cannot actuate when it receives an actuation signal. Thus, the statements are incorrect and do not meet the intent of the specifications. Comment: Delete these sentences from the justification JFD 22 and ITS B3.6.6 Bases - ACTION D.

WEPC Response:

3.6.6-4 DOC M.5
 JFD 24
 CTS 4.5.I.B
 STS SR 3.6.6A.3 and Associated Bases
 ITS SR 3.6.6.3 and Associated Bases

CTS 4.5.I.B is modified by the addition of ITS SR 3.6.6.3 which verifies the cooling water flow rate through the containment fan coolers. ITS SR 3.6.6.3 differs from the corresponding STS SR 3.6.6.3 in that the ITS does not specify the design or accident flow rate, it just verifies that the flow rate is within limits. The limits would be specified in some other document. DOC M.5 and JFD 24 state that the safety analyses assumes a specific flow rate for the accident condition. This is the value that should be specified in ITS SR 3.6.6.3. How this value is verified or demonstrated is left up to the licensee, and thus is not specified in the SR or its associated Bases. The Staff recognizes that this value can be verified in any number of ways depending on system configuration. For example, the system could be aligned in the accident alignment assumed in the safety analyses, thus the flow rate would have to equal the specified SR limit. The system could also be aligned in any other alignment. In these cases the licensee would have to show or have documented by calculation or other means that the measured flow rate is at least equivalent to, if not greater than the design/accident flow rate. What the SR is verifying is that the system will operate properly under accident conditions and that the accident flow rate will be achieved. The proposed SR may not accomplish that or show that the other limits have a Bases associated with the accident condition.

Comment: Revise the CTS/ITS markups of SR 3.6.6.3 to specify the specific design/accident flow rate contained in the safety analyses. Provide additional discussion and justification, as necessary.

WEPC Response:

3.6.6-5 DOC LA.1
 CTS 4.5.I.B.1
 CTS 4.5.I.B.2
 ITS SR 3.6.6.5

CTS 4.5.I.B.1 specifies that the Containment Spray System system test shall be performed with the isolation valves in the supply lines at the containment blocked closed. CTS 4.5.I.B.2 specifies that the Containment Spray System tests will be considered satisfactory if visual observations indicate all components have operated satisfactorily. The CTS markup shows both of these requirements as being relocated to 10 CFR 50.59 controlled documents, and indicates the change as a Less Restrictive (LA) change. DOC LA.1 only provides a discussion for the deletion of these CTS requirements. Since this is a deletion of a requirement (relocation to a non 10 CFR 50.59 controlled document), these changes are considered to be Less Restrictive (L) changes. See Comment Numbers 3.6.6-6 and 3.6.6-7 for additional concerns with regards to CTS 4.5.I.B.1.

Comment: Revise the CTS markup and provide a discussion and justification for these Less Restrictive (L) changes. See Comment Numbers 3.6.6-6 and 3.6.6-7.

WEPC Response:

3.6.6-6 DOC LA.1
 CTS 4.5.I.B.1
 ITS SR 3.6.6.5, SR 3.6.6.6, and Associated Bases

CTS 4.5.I.B.1 specifies that the Containment Spray System system test shall be performed with the isolation valves in the supply lines at the containment blocked closed. The ITS breaks this CTS surveillance into two surveillances - ITS SR 3.6.6.5 and SR 3.6.6.6. ITS SR 3.6.6.5 verifies that each automatic containment spray valve that is not locked, sealed or otherwise secured in position actuates to its correct position on an actuation signal. (See Comment Number 3.6.6-6 for additional concerns with regards to actuation signal). It is unclear from the CTS, CTS Basis and ITS SR 3.6.6.5 and its associated Bases if the isolation valves that are blocked closed for the test are manual or automatic valves. If they are manual valves then there is no problem. However, if these valves are automatic, then there is the concern as to when these valves will be tested per ITS SR 3.6.6.5. since the locked, sealed, and secured exception in the SR could result in the valves never being tested for this SR. The exception from testing of locked, sealed or otherwise secured valves was only intended to apply to those valves that during normal operating conditions are locked, sealed, or otherwise secured in position.

Comment: Specify whether the isolation valve is manual or automatic. If automatic, discuss when and how this valve will be tested in accordance with ITS SR 3.6.6.5. See Comment Number 3.6.6-6.

WEPC Response:

3.6.6-7 DOC LA.1
 CTS 4.5.I.B.1
 ITS SR 3.6.6.5, SR 3.6.6.6 and Associated Bases

CTS 4.5.I.B.1 requires a system test of the Containment Spray System and specifies that "Operation of the system is initiated by tripping the normal actuation instrumentation." The ITS breaks this CTS surveillance up into two surveillances - ITS SR 3.6.6.5 and SR 3.6.6.6, however the ITS tests may be initiated by either an actual or simulated actuation signal. The CTS markup does not show this change "normal actuation" to "actual or simulated actuation" but it does show that the statement is relocated (DOC LA.1). This is incorrect. "Tripping the normal actuation" connotes only a simulated actuation. By adding the words "actual actuation" the change becomes a Less Restrictive (L) change.

Comment: Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.

WEPC Response:

3.6.6-8 DOC LA.1
 JFD 27
 CTS 4.5.I.C.2
 ITS SR 3.6.6.2 and Associated Bases

CTS 4.5.I.C.2 specifies that the containment fan cooler accident fans shall be tested monthly to verify OPERABILITY. It also specifies that the performance shall be acceptable if the fan starts and the running current is verified. The CTS markup shows this requirement as being relocated to a 10 CFR 50.59 controlled document (DOC LA.1). However, DOC LA.1 only discusses relocating requirements to non-10 CFR 50.59 controlled documents which would be a Less Restrictive (L) change, not an LA change. The acceptance criteria is actually relocated to the Bases discussion of ITS B3.6.6 Bases - SR 3.6.6.2 in Insert B3.6.6-14. See Comment Number 3.6.6-9.

Comment: Provide a discussion and justification for this Less Restrictive (LA) change. See Comment Number 3.6.6-9.

WEPC Response:

3.6.6-9 DOC LA.1
 JFD 27
 CTS 4.5.I.C.2
 STS B3.6.6 Bases - SR 3.6.6A.2
 ITS B3.6.6 Bases - SR 3.6.6.2

CTS 4.5.I.C.2 specifies that the containment fan cooler accident fans shall be tested monthly to verify OPERABILITY. It also specifies that the performance shall be acceptable if the fan starts and the running current is verified. The CTS/ITS markups show this requirement as being relocated to the Bases as Insert B3.6.6-14. See Comment Number 3.6.6-8 for concerns with regards to justifying the relocation. STS B3.6.6 Bases - SR 3.6.6A.2 states that the purpose of the SR is to ensure that all associated controls are functioning properly and that blockage, fan or motor failure or excessive vibration can be detected for corrective action. ITS B3.6.6 Bases - SR 3.6.6.2 deletes all mention of associated controls and the items to be detected for corrective action. The justification (JFD 27) for this deletion states that the containment fan coolers do not have any associated controls nor does it have any installed vibration monitoring equipment. With regards to the deletion of the associated controls aspect, the Insert states explicitly what the associated controls are - fan run indication, motor running amps, and low flow alarms. Thus the deletion of the words associated with the "controls" should not be deleted. With regards to detection of excessive vibration, the STS does not specify or require that vibration monitors be installed. The vibration monitors could be portable, it could be done through visual observation, or through other means.

Comment: Revise the ITS markup to retain the STS wording, or provide additional discussion and justification for its deletion. See Comment Number 3.6.6-8.

WEPC Response:

3.6.6-10 DOC LA.1
CTS 4.5.II.A.2
ITS SR 3.6.6.4 and Associated Bases

CTS 4.5.II.A.2 specifies the containment spray pump acceptance criteria that each pump starts, reaches the required developed head and operates for at least 15 minutes. ITS SR 3.6.6.4 maintains these requirements except that the criterion to operate the pump for at least 15 minutes is deleted. The CTS markup show this as a Less Restrictive (LA) change (DOC LA.1), relocation to a 10 CFR 50.59 controlled document. However, DOC LA.1 only discuss deletion of the requirement. Since this is a deletion of a requirement (relocation to a non-10CFR 50.59 controlled document), this change is considered to be a Less Restrictive (L) change. Comment: Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.

WEPC Response:

3.6.6-11 JFD 8
STS B3.6.6A Bases - BACKGROUND
ITS B3.6.6 BACKGROUND

STS B3.6.6.A Bases - BACKGROUND makes a number of statements with regards to operation of the Containment Spray System in the re-circulation mode of operation. The STS statements are general in nature and explains how re-circulation flow is accomplished and when re-circulation flow is necessary or desired. The ITS deletes these words using justification JFD 8. JFD 8 does state that the system can be aligned in a re-circulation flow mode of operation, but the accident analysis does not assume it. Even though the re-circulation mode of operation is not assumed in the safety analysis, it is a mode of system operation that can be used and may be specified in plant operating or emergency procedures. Therefore, the Staff believes that the STS words or a modification of these words to reflect plant operation should be in ITS B3.6.6 Bases - BACKGROUND to fully describe the system and its operating modes.

Comment: Revise ITS B3.6.6 Bases - BACKGROUND to describe the containment spray system re-circulation mode of operation.

WEPC Response:

3.6.6-12 JFD 18
JFD 19
STS B3.6.6A Bases - LCO
ITS B3.6.6 Bases - LCO

STS B3.6.6A Bases - LCO states the following: "Additionally, one containment spray train... safety analysis." The ITS markup deletes this sentence and replaces it with Insert B3.6.6-09; this change is justified by JFD 19. However, Insert B3.6.6-09 indicates that JFD 18 applies. JFD 18 deals with reference renumbering.

Comment: Correct this discrepancy.

WEPC Response:

3.6.6-13 JFD 18
ITS B3.6.6 Bases - SR 3.6.6.4 and REFERENCES

ITS B3.6.6 Bases - SR 3.6.6.4 states the following: "Flow and pressure differential... required by Section XI of the ASME Code (Ref.3)." ITS B3.6.6 Bases - REFERENCES shows that reference 3 IS "FSAR Section 14" while the ASME Code, Section XI is reference 4.

Comment: Correct this discrepancy.

WEPC Response:

3.6.7 Spray Additive System

3.6.7-1 DOC A.3
CTS 3.3 OBJECTIVE
CTS 4.5 OBJECTIVE
ITS B3.6.7 Bases

CTS 3.3 OBJECTIVE and CTS 4.5 OBJECTIVE provides an introductory statement of the purpose of these Technical Specification Sections. DOC A.3 states that this information is contained in the Bases section of ITS 3.6.7. Based on this statement, the change is a Less Restrictive (LA) change - relocation to a licensee controlled document, not an Administrative change.

Comment: Revise the CTS markup and DOC A.3 to show the change as a Less Restrictive (LA) change.

WEPC Response:

3.6.7-2 DOC A.5
 CTS 3.3.B.1.d
 ITS B3.6.7 Bases - LCO

CTS 3.3.B.1.d states that “All valves and piping associated with the above components and required to function during accident conditions, are operable.” The CTS markup shows this requirement as being deleted by DOC A.5. DOC A.5 justifies the deletion based on definition of OPERABILITY. This is incorrect. This statement is not deleted, but has been relocated to ITS B3.6.7 Bases - LCO and is part of the discussion in this ITS Section describing what constitutes an OPERABLE Spray Additive System. Therefore, the change is a Less Restrictive (LA) change rather than an Administrative change.
Comment: Revise the CTS markup and provide additional discussion and justification for this Less Restrictive (LA) change.

WEPC Response:

3.6.7-3 DOC LA.1
 CTS 4.5.I.B.1
 CTS 4.5.B.2
 ITS SR 3.6.7.4

CTS 4.5.I.B.1 specifies that the Spray Additive System system test shall be performed with the isolation valves in the supply lines at the containment blocked closed. CTS 4.5.I.B.2 specifies that the Spray Additive System tests will be considered satisfactory if visual observations indicate all components have operated satisfactorily. The CTS markup shows both of these requirements as being relocated to 10 CFR 50.59 controlled document and indicates the change as a Less Restrictive (LA) change. DOC LA.1 only provides a discussion for the deletion of these CTS requirements. Since this is a deletion of a requirement (relocation to a non 10 CFR 50.59 controlled document), these changes are considered to be Less Restrictive (L) changes. See Comment Numbers 3.6.7-4 and 3.6.7-5 for additional concerns with regards to CTS 4.5.I.B.1.

Comment: Revise the CTS markup and provide a discussion and justification for these Less Restrictive (L) changes. See Comment Numbers 3.6.7-4 and 3.6.7-5.

WEPC Response:

3.6.7-4 DOC LA.1
 CTS 4.5.I.B.1
 ITS SR 3.6.7.4 and Associated Bases

CTS 4.5.I.B.1 specifies that the Spray Additive System system test shall be performed with the isolation valves in the supply lines at the containment blocked closed. The corresponding ITS SR is ITS SR 3.6.7.4. ITS SR 3.6.7.4 verifies that each automatic spray additive valve that is not locked, sealed or otherwise secured in position actuates to its correct position on an actuation signal. (See Comment Number 3.6.7-5 for additional concerns with regards to actuation signal). It is unclear from the CTS, CTS Basis and ITS SR 3.6.7.4 and its associated Bases if the isolation valves that are blocked closed for the test are manual or automatic valves. If they are manual valves then there is no problem. However, if these valves are automatic then there is the concern as to when these valves will be tested per ITS SR 3.6.7.4 since the locked, sealed, and secured exception in the SR could result in the valves never being tested per this SR. The exception from testing of locked, sealed or otherwise secured valves was only intended to apply to those valves that during normal operating conditions are locked, sealed, or otherwise secured in position.

Comment: Specify whether the isolation valve is manual or automatic. If automatic, discuss when and how this valve will be tested in accordance with ITS SR 3.6.7.4. See Comment Number 3.6.7-5.

WEPC Response:

3.6.7-5 DOC LA.1
 CTS 4.5.I.B.1
 ITS SR 3.6.7.4 and Associated Bases

CTS 4.5.I.B.1 requires a system test of the Spray Additive System and specifies that "Operation of the system is initiated by tripping the normal actuation instrumentation." The corresponding ITS SR is ITS SR 3.6.7.4, however the ITS tests may be initiated by either an actual or simulated actuation signal. The CTS markup does not show this change "normal actuation" to "actual or simulated actuation" but it does show that the statement is relocated (DOC LA.1).

This is incorrect. "Tripping the normal actuation" connotes only a simulated actuation. By adding the words "actual actuation" the change becomes a Less Restrictive (L) change.

Comment: Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.

WEPC Response:

3.6.7-6 DOC L.1
 CTS 3.0.B
 CTS 3.3.B.1.a
 CTS 3.3.B.2.c
 ITS 3.6.7 ACTION A

ITS 3.6.7 ACTION A is added to the CTS markup of CTS 3.3.B.2.c. This addition is justified by DOC L.1. The Staff agrees that the addition of ITS 3.6.7 ACTION A is a Less Restrictive (L) change, however DOC L.1 does not provide sufficient discussion and justification for this change. The following CTS items have not been addressed by the addition of ACTION A:

1. CTS 3.3.B.1.a specifies the spray additive tank level and NaOH concentration in the tank. If either of these limits are not met, the CTS requires an immediate shutdown per CTS 3.0.B. ITS 3.6.7 ACTION A would allow 72 hours to restore level or concentration before shutdown commences. The CTS markup does not show any relation between violation of the requirements of CTS 3.3.B.1.a and ITS 3.6.7 ACTION A. The CTS markup only shows ITS 3.6.7 ACTION A as applying to inoperable spray additive valves (CTS 3.3.B.2.c). Thus DOC L.1 does not provide any discussion or justification as to why this change is acceptable.

2. The Spray Additive System consists of one spray additive tank and two flow paths from the tank to the containment spray pumps. CTS 3.3.B.1.c only allows one of these flow paths to be inoperable for 72 hours before a shutdown is required as implied by the "Prior to initiating repairs..." statement. If both flow paths are inoperable, an immediate shutdown per CTS 3.0.B is required. The ITS would allow 72 hours to restore both flow paths before requiring a shutdown. DOC L.1 does not provide any discussion or justification as to why this change is acceptable.

Comment: Revise the CTS markup to address item 1 above and provide additional discussion and justification for this Less Restrictive (L) change.

WEPC Response:
