

Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515-5701



RS-00-45

July 18, 2000

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555-0001

Dresden Nuclear Power Station, Units 2 and 3
Facility Operating License Nos. DPR-19 and DPR-25
NRC Docket Nos. 50-237 and 50-249

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating License Nos. DPR-29 and DPR-30
NRC Docket Nos. 50-254 and 50-265

Subject: Response to Request for Additional Information

- References: (1) Letter from R. M. Krich (ComEd) to U. S. NRC Document Control Desk, "Request for Technical Specifications Changes for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2, to Convert to Improved Standard Technical Specifications," dated March 3, 2000.
- (2) Letter from S. N. Bailey (U. S. NRC) to O. D. Kingsley, "Request for Additional Information," dated June 21, 2000.

Commonwealth Edison (ComEd) Company in a letter dated March 3, 2000, Reference 1, proposed changes to the Technical Specifications (TS) of Facility Operating License Nos. DPR-19, DPR-25, NPF-11, NPF-18, DPR-29, and DPR-30 for Dresden Nuclear Power Station, Units 2 and 3, LaSalle County Station, Units 1 and 2, and Quad Cities Nuclear Power Station, Units 1 and 2. The NRC subsequently issued a Request for Additional Information (RAI) letter

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in Reference 2. The RAI letter requested that additional information be provided concerning Section 3.0, "Limiting Condition for Operation (LCO) and Surveillance Requirement (SR) Applicability," and Section 3.6, "Containment Systems," of Reference 1 within 60 days after receipt of the letter (i.e., by August 28, 2000). The RAI letter also requested that any necessary revisions to the Reference 1 submittal be made within 60 days of the submittal. The requested additional information is provided in the Attachment to this letter. The necessary changes to the Reference 1 submittal will be made after resolution of the issues in the RAI letter is achieved.

Should you have any questions concerning this letter, please contact Mr. J. V. Sipek at (630) 663-3741.

Respectfully,

Handwritten signature of R. M. Krich in cursive script.

R. M. Krich
Vice President - Regulatory Services

Attachment: Response to Request for Additional Information

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector - Dresden Nuclear Power Station
NRC Senior Resident Inspector - LaSalle County Station
NRC Senior Resident Inspector - Quad Cities Nuclear Power Station
Office of Nuclear Facility Safety - Illinois Department of Nuclear Safety

ATTACHMENT

Response to Request for Additional Information

REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.0
DRESDEN, QUAD CITIES, AND LASALLE

3.0 LIMITING CONDITION FOR OPERATION (LCO) APPLICABILITY:

Bases of SR 3.0.1 is incorporating TSTF-8 for the following:

Unplanned events may satisfy the requirements (including applicable acceptance criteria) for a given SR. In this case, the unplanned event may be credited as fulfilling the performance of the SR. This allowance includes those SRs whose performance is normally precluded in a given MODE or other specified condition.

However, in your conversion, the last sentence of the above paragraph is not adopted. The JFD for this change needs further clarification.

Response:

The last sentence of the above Bases paragraph from generic change Technical Specifications Task Force (TSTF)-8, "This allowance includes those SRs whose performance is normally precluded in a given MODE or other specified condition," is not included in the Bases of the Dresden Nuclear Power Station, Units 2 and 3 (i.e., Dresden 2 and 3), LaSalle County Station, Units 1 and 2 (i.e., LaSalle 1 and 2), and Quad Cities Nuclear Power Station, Units 1 and 2 (i.e., Quad Cities 1 and 2), Improved Technical Specifications. Justification for Deviation (JFD) 11 for Dresden and Quad Cities and JFD 12 for LaSalle explain that the statements in the Technical Specification Bases cannot be used to change Technical Specification requirements. Therefore, when MODE restrictions for performance of Surveillances are included in the Technical Specifications (e.g., the Surveillance may only be performed in MODE 4 or 5), a Bases statement, such as that included in TSTF-8, cannot be used to allow an unplanned event in a MODE in which performance of the Surveillance is restricted (e.g., MODE 1, 2, or 3) to be credited as fulfilling performance of the Surveillance Requirement. Commonwealth Edison (ComEd) Company has proposed a revision to TSTF-8 to correct this discrepancy.

**REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.6
DRESDEN AND QUAD CITIES**

3.6 General

Note: 1. Unless specified in the particular comment, all DOCs, JFDs and Bases JFDs are the same for both Dresden and Quad Cities.

2. Unless specified, all comments apply to both Dresden and Quad Cities.

**3.6.0-1 DOC LD.1 (Sections 3.6.1.1, 3.6.1.3, 3.6.1.7, 3.6.1.8, 3.6.4.1, 3.6.4.2 and 3.6.4.3)
 DOC A.3 (Section 3.6.1.6)
 JFD 1 (Sections 3.6.1.8, 3.6.4.1 and 3.6.4.2)
 JFD 2 (Section 3.6.1.6)
 JFD 2 (Quad Cities) (Section 3.7.1.7)
 JFD 3 (Section 3.6.1.1)
 JFD 3 (Dresden) (Section 3.6.1.7)
 JFD 4 (Section 3.6.1.6)
 JFD 8 (Dresden) (Section 3.6.1.3)
 JFD 9 (Quad Cities) (Section 3.6.1.3)
 Bases JFD 1 (Sections 3.6.1.3 and 3.6.4.1)
 Bases JFD 2 (Sections 3.6.1.3, 3.6.1.6, 3.6.1.7, 3.6.4.2, and 3.6.4.3)
 Bases JFD 2 (Quad Cities) (Section 3.6.1.8)
 Bases JFD 3 (Section 3.6.1.1, and 3.6.1.6)
 Bases JFD 3 (Dresden) (Section 3.6.1.8)
 CTS 4.6.F, 4.7.D.2, 4.7.D.4, 4.7.D.5, 4.7.E.2.c, 4.7.F.2.b, 4.7.K.5, 4.7.N.3, 4.7.O.2 and 4.7.P.4
 ITS 3.6.1.1, 3.6.1.3, 3.6.1.7, 3.6.1.8, 3.6.4.1, 3.6.4.2, 3.6.4.3 and Associated Bases**

The frequencies for performing various CTS surveillances is specified as 18 months or refueling outages. The CTS and ITS markups change these frequencies to 24 months to accommodate a 24 month fuel cycle. The changes are justified by the DOCs and JFDs specified above. This change is considered as a beyond scope of review item for this conversion which is being independently reviewed by the staff. **Comment: None**

ComEd Response: None

3.6.1.1 Containment

**3.6.1.1-1 DOC LD.1
 JFD 3
 Bases JFD 3
 CTS 4.7.K.5
 ITS SR 3.6.1.1.2 and Associated Bases**

See Comment Numbers 3.6.0-1 and 3.6.1.1-2. **Comments:** See Comment Numbers 3.6.0-1 and 3.6.1.1-2.

ComEd Response:

See responses to NRC Comments 3.6.0-1 and 3.6.1.1-2.

3.6.1.1-2 DOC LD.1
 DOC L.4
 JFD 2
 JFD 3
 Bases JFD 3
 CTS 4.7.K.5
 STS SR 3.6.1.1.2 and Associated Bases
 ITS SR 3.6.1.1.2 and Associated Bases

CTS 4.7.K.5 requires the drywell-to-suppression chamber bypass leakage test to be performed at an accelerated frequency (every 9 months versus the normal 18 months) if two consecutive tests fail to meet the specified limit. This accelerated testing requirement has been deleted in ITS SR 3.6.1.1.2. STS SR 3.6.1.1.2 specifies this accelerated testing frequency. Based on the justification provided (DOC L.4), the staff finds that this change could be a beyond scope of review item for this conversion; however, the justification is also generic in nature and thus the change would be considered as a generic change. Since the base frequency of 18 months is being changed to 24 months by DOC LD.1 and JFD 3 (See Comment Numbers 3.6.0-1 and 3.6.1.1-1), the staff will accept an accelerated test frequency of once every 12 months. **Comment:** Delete this generic change and modify the CTS/ ITS markup as discussed above.

ComEd Response:

This issue has been identified as a beyond scope change in our submittal and is being processed by the NRC Project Manager.

3.6.1.1-3 DOC L.3
 JFD 2
 Bases JFD 3
 CTS 3.7.K.3 and 4.7.K.5
 STS SR 3.6.1.1.2 and Associated Bases
 ITS SR 3.6.1.1.2 and Associated Bases

CTS 3.7.K.3 and 4.7.K.5 specify that the total leakage between the suppression chamber and drywell be less than the equivalent leakage through a 1 inch diameter orifice at a differential pressure of 1.0 psid. ITS SR 3.6.1.1.2 specifies that the drywell-

to-suppression chamber bypass leakage be less than or equal to the bypass leakage limits, with the actual limits being specified in the Bases for SR 3.6.1.1.2. The leakage limits specified in the Bases differ from the CTS limits and requirements in that the CTS requirements only have to be met during the first unit startup following bypass leakage testing. At all other times the bypass leakage must be less than or equal to the acceptable A/\sqrt{k} design valve of 0.18 ft² assumed in the safety analysis, which is different than the CTS limits by approximately 2%. STS SR 3.6.1.1.2 specifies the bypass limits directly in the SR not in the Bases. The staff concludes that the proposed change is not only a beyond scope of review item for this conversion (change in bypass leakage limits), but also a generic change (movement of limits to Bases). In addition, based on the discussion provided in DOC L.3 with regards to the bypass leakage limit changes (two leakage limits- initial test limit and at other times limit - versus one limit at all times), the staff also concludes that the beyond scope item would be considered as a generic change. **Comment:** Delete these generic changes.

ComEd Response:

This issue has been identified as a beyond scope change in our submittal and is being processed by the NRC Project Manager.

3.6.1.2 Primary Containment Air Lock

3.6.1.2-1 DOC A.7
 CTS 3.7.C ACTION 2
 ITS 3.6.1.2 ACTION D

CTS 3.7.C ACTION 2 for an inoperable primary containment air lock interlock mechanism does not include a default ACTION consistent with the other ACTIONS in CTS 3.7.C (i.e., a plant shutdown). The CTS markup shows the addition of ITS 3.6.1.2 ACTION D to CTS 3.7.C ACTION 2 and designates this change as an Administrative change (DOC A.7). This is incorrect. The default action in the CTS for this condition is CTS 3.0.C which allows an additional hour before a shutdown is started, which the ITS does not allow. Thus the change is a More Restrictive change. **Comment:** Revise the CTS markup and provide additional discussion and justification for this More Restrictive change.

ComEd Response:

The associated CTS markup will be revised and a "More Restrictive" DOC will be provided for ITS 3.6.1.2 ACTION D.

3.6.1.2-2 DOC L.2
 CTS 3.7.C ACTIONS 1 and 3
 ITS 3.6.1.2 Required Actions A.1 and C.2

CTS 3.7.C ACTIONS 1 and 3 require that with an airlock door or airlock inoperable that at least one airlock door be maintained closed. The CTS markup indicates through DOC L.2 that the word "maintain" is changed to "verify" and one hour is allowed to complete this verification. The change is characterized as a Less Restrictive (L) change. The justification (DOC L.2) does not provide sufficient information to conclude that the change is a Less Restrictive (L) change. However, because no time limit is specified in the CTS other than the "within 24 hours" to lock the OPERABLE airlock door closed or restore the inoperable airlock to OPERABLE status, the staff concludes that the change is a More Restrictive change. **Comment:** Revise the CTS markup and provide a discussion and justification for this More Restrictive change.

ComEd Response:

CTS 3.7.C Actions 1 and 3 require that with one air lock door or the air lock inoperable, the other OPERABLE air lock door or one air lock door, as applicable, be maintained closed. Maintaining the other OPERABLE air lock door closed or one air lock door closed, as applicable, is an immediate action since no time is provided in the Actions. If the other air lock door is not OPERABLE and closed or one air lock door is not closed, Action 1.c or the second part of Action 3, as applicable, must be taken, which require a shutdown. ITS 3.6.1.2 ACTIONS A and C allow 1 hour to ensure the other OPERABLE air lock door is closed or one air lock door is closed, as applicable, when one air lock door is inoperable or the air lock is inoperable. In addition, DOC L.2 was modified, prior to submittal, to clarify that the CTS word "maintain" is an immediate action consistent with the NRC approved DOC at Nine Mile Point Unit 2.

3.6.1.2-3 Bases JFD 3
 STS B3.6.1.2 Bases - A.1, A.2 and A.3
 ITS B3.6.1.2 Bases - A.1, A.2 and A.3

The last paragraph in STS B3.6.1.2 Bases - A.1, A.2 and A.3 describes and justifies the Notes associated with the Required Actions. ITS B3.6.1.2 Bases - A.1, A.2 and A.3 breaks this paragraph up into two paragraphs. The point at which the break occurs - sentence beginning "Primary containment entry..." - discusses and justifies Note 2. No reference is made in this new paragraph to Note 2. However, the preceding paragraph has the introductory statements for Note 2. The change is classified as an editorial for

enhanced clarity (Bases JFD 3). The change does not enhance clarity but causes confusion. **Comment:** Delete this change.

ComEd Response:

This change was done for consistency with the LaSalle ITS and NUREG-1434 (i.e., the BWR/6 Improved Standard Technical Specifications (ISTS)). Therefore, the change will remain.

3.6.1.2-4 Bases JFD 8
 CTS 4.7.C.2
 STS SR 3.6.1.2.2 and Associated Bases
 ITS SR 3.6.1.2.2 and Associated Bases

STS SR 3.6.1.2.2 requires verify only one door in the airlock will open at a time at six month intervals. The interval is modified in ITS SR 3.6.1.2.2 from 6 months to 24 months. This modification is in accordance with TSTF-17; however, the Bases changes are not in accordance with TSTF-17. In particular, the deletion of the sentence which justifies the frequency based on generic operating experience rather than plant specific experience. **Comment:** Revise the ITS Bases to be in accordance with TSTF-17 or justify the deviations.

ComEd Response:

We made two editorial changes concerning the TSTF-17, Rev. 1, Bases change, consistent with the most recent BWR ITS submittal. The first change was to TSTF-17, Rev. 1, Insert B. Insert B stated that "The 24 month Frequency for the interlock is justified based on generic operating experience." This type of statement is not worded this way anywhere else in the ISTS Bases. The words were changed in the Dresden 2 and 3 and Quad Cities 1 and 2 ITS Bases to "Operating experience has shown these components usually pass the Surveillance when performed at the 24 month Frequency." The proposed words are consistent with numerous statements in the ISTS Bases. This change is justified in JFD 8. The wording of JFD 8 for this change was previously accepted by the NRC during the review of the Nine Mile Point Unit 2 ITS submittal. The second change was to correct a typographical error in TSTF-17, Rev. 1, Insert C. Insert C used the word "airlock" instead of "air lock." This change is justified in JFD 4. In addition, plant-specific operating experience has shown this frequency to be acceptable based on failure history. For these reasons, a revision to the ITS submittal is not required.

3.6.1.3 Primary Containment Isolation Valves (PCIVs)

3.6.1.3-1 DOC A.3
 CTS 3.7.A ACTIONS
 CTS 3.7.D ACTIONS

ITS 3.6.1.3 ACTIONS Notes 2

CTS 3.7.D ACTIONS are modified by the addition of ITS 3.6.1.3 ACTIONS Note 2. This change is characterized as an Administrative change (DOC A.3). While this change is acceptable for CTS 3.7.D, it still needs to be addressed for the changes imposed on CTS 3.7.A as a result of Comment Number 3.6.1.3-13. For that change, the addition of ITS 3.6.1.3 ACTIONS Note 2 becomes a Less Restrictive (L) change, because nothing in the ACTION statements of 3.7.A imply separate condition entry. **Comment:** Revise the CTS markup and provide the appropriate discussions and justifications for this Less Restrictive (L) change. See Comment Number 3.6.1.3-13.

ComEd Response:

If a valve is opened that is not allowed to be opened, the Actions of CTS 3.7.D are entered, not the Actions of CTS 3.7.A. CTS LCO 3.7.A requires PRIMARY CONTAINMENT INTEGRITY to be maintained. The CTS definition of PRIMARY CONTAINMENT INTEGRITY states, in part, that PRIMARY CONTAINMENT INTEGRITY exists when "All primary containment penetrations required to be closed under accident conditions are ... Closed by at least one manual valve, blind flange, or de-activated automatic valve secured in its closed position, except for valves that are open under administrative control as permitted by Specification 3.7.D." Thus, when one of two manual valves in the penetration is open, PRIMARY CONTAINMENT INTEGRITY is still met, since one valve is still closed and the Actions of CTS 3.7.A do not have to be entered. With one of two valves open when not allowed by CTS 3.7.D footnote a, this valve would be declared Inoperable and the Actions of CTS 3.7.D entered. Therefore, CTS 3.7.D does apply to devices addressed in CTS 4.7.A.2. Separate Condition entry for each penetration flow path is allowed in CTS 3.7.D, therefore, DOC A.3 is sufficient to address the devices in CTS 4.7.A.2 and no additional justification is necessary. This is consistent with the ComEd interpretation of the requirement.

3.6.1.3-2 DOC A.5
 CTS 3.7.D ACTION 1
 CTS 3.6.M ACTION
 ITS 3.6.1.3 ACTIONS A and C

CTS 3.7.D ACTION 1 and 3.6.M ACTION requires that with one or more PCIV/MSIV inoperable, one maintains at least one valve OPERABLE in each affected penetration that is open. The CTS markup deletes this requirement (maintain OPERABLE valve). This change is characterized as an Administrative change (DOC A.5). DOC A.5 states that CTS 3.7.0 ACTION 1 and CTS 3.6.M ACTION do not specify whether a penetration has one or two valves, and that ITS 3.6.1.3 ACTION A applies if the affected penetration has two or more valves and only one is inoperable. DOC A.5 also states that "This inherently ensures maintaining' at least one isolation valve OPERABLE'." These statements are correct for the changes associated with converting CTS 3.7.D ACTION 1 and CTS 3.6.M ACTION to ITS 3.6.1.3 ACTION A and thus acceptable. However, DOC

A.5 also states that for penetrations with only one isolation valve the system boundary is considered as an adequate barrier and thus the penetration is not considered open. This is not entirely correct. One could argue that this is true for penetrations with one PCIV and a closed system as well as penetrations with two PCIVs and a closed system. However, ITS 3.6.1.3 ACTION C also applies to penetrations with one PCIV on a non-closed system and EFCVs. In this case and possibly for the one valve closed system case, with an inoperable valve CTS 3.7.D ACTION 1 requires an immediate shutdown because one cannot maintain at least one OPERABLE valve in the penetration. ITS 3.6.1.3 ACTION C would allow either 4 or 72 hours depending on the system design or type of valve to isolate the penetration before requiring a shutdown (i.e., using a modification of CTS 3.7.D ACTION 1.a, 1.b, or 1.c.). Thus the change is a Less Restrictive (L) change with regards to ITS 3.6.1.3 ACTION C. **Comment:** Revise the CTS markup and provide the appropriate discussions and justifications for this Less Restrictive (L) change.

ComEd Response:

For the comment regarding a penetration with only one primary containment isolation valve and a closed system, ITS 3.6.1.3 DOC A.5 adequately addresses the proposed ACTION and has been previously accepted by the NRC during the review of the Nine Mile Point Unit 2 ITS conversion.

For the comment regarding penetrations with only one primary containment isolation valve on a non-closed system or Excess Flow Check Valves (EFCVs), ITS 3.6.1.3 DOCs L.1 and L.8 adequately address the proposed ACTION and have been previously accepted by the NRC during the review of the Nine Mile Point Unit 2 ITS conversion.

3.6.1.3-3 DOC LA.3
 JFD 8 (Dresden)
 JFD 9 (Quad Cities)
 JFD 11 (Quad Cities)
 JFD 12 (Dresden)
 Bases JFD 2
 Bases JFD 6
 CTS 4.7.D.6
 ITS SR 3.6.1.3.10 and Associated Bases

CTS 4.7.D.6 verifies that the "total maximum pathway leakage for all Main Steam Isolation Valves is \leq 46 scfh when tested at P_1 (25 psig)." ITS SR 3.6.1.3.10 verifies that the "combined leakage rate for all MSIV leakage paths is \leq 46 scfh when tested at \geq 25 psig." The CTS markup shows the terminology "total maximum pathway" has been relocated to the Bases by DOC LA.3. This is incorrect. The item has not been relocated, and the proposed ITS SR and its associated Bases discussion indicate that the CTS requirements are changed. The CTS requires the test be done on each individual MSIV pathway and that the total leakage per pathway cannot exceed 46 scfh when tested at 25 psig. The ITS requires that the combined leakage from all the

pathways cannot exceed 46 scfh when tested at 25 psig. Thus the ITS is more restrictive than the CTS. Thus the change is not a Less Restrictive/Relocation (LA) change but a More Restrictive change. In addition, because it changes the limits, the change is a beyond scope of review item for this conversion. **Comment:** Revise the CTS/ITS markups to reflect the CTS requirements and provide the appropriate discussions and justifications for this change.

ComEd Response:

Insert SR 3.6.1.3.10 for the ISTS markups for Dresden 2 and 3 and Quad Cities 1 and 2 indicate that the leakage rate of each main steam isolation valve path is assumed to be the maximum pathway leakage (leakage through the worse of the two isolation valves). Therefore, the maximum pathway leakage requirement has been relocated to the Bases. In addition, the NRC interpretation that CTS 4.7.D.6 allows up to 46 scfh of leakage per pathway is incorrect. CTS 4.7.D.6 requires the total leakage from all main steam isolation valves to be \leq 46 scfh.

3.6.1.3-4 DOC LD.1
 JFD 8 (Dresden)
 JFD 9 (Quad Cities)
 Bases JFD 1
 Bases JFD 2
 CTS 4.7.D.2, 4.7.D.4, and 4.7.D.5.b
 ITS SR 3.6.1.3.7, SR 3.6.1.3.8, SR 3.6.1.3.9 and Associated Bases

See Comment Number 3.6.0-1. **Comment:** See Comment Number 3.6.0-1.

ComEd Response: None.

3.6.3-5 DOC L.7
 JFD 8 (Dresden)
 JFD 9 (Quad Cities)
 Bases JFD 1
 Bases JFD 2
 CTS 4.7.D.4
 STS SR 3.6.1.3.10 and Associated Bases
 ITS SR 3.6.1.3.8 and Associated Bases

CTS 4.7.D.4 verifies that each EFCV is OPERABLE "by verifying that the valve checks flow." The CTS is modified by DOC L.7 to add the acceptance criteria that the EFCV actuates to the isolation position on an actual or simulated instrument line break. The corresponding ITS SR is ITS SR 3.6.1.3.8. The modified CTS 4.7.D.4 and ITS SR 3.6.1.3.8 differ from STS SR 3.6.1.3.10 in two places. The STS words "to restrict flow to less than 1 gph" is replaced with "to the isolation position" and the ITS adds the words "an actual or". While concerns with the former change are addressed in Comment

Number 3.6.1.3-5, the later change is not acceptable. The addition of the words "an actual or" is applicable to other BWR-4 and BWR-6 plants and the technical implications of the change are unknown. Thus the change is considered as a generic change which would be a beyond scope of review item for this review. **Comment:** Delete this generic change. See Comment Number 3.6.1.3-5.

ComEd Response:

This issue has been identified as a beyond scope change in our submittal and is being processed by the NRC Project Manager. In addition, this change has been previously approved by the NRC during the review of the Nine Mile Point Unit 2 ITS submittal.

3.6.1.3-6 DOC L.7
 JFD 8 (Dresden)
 JFD 9 (Quad Cities)
 Bases JFD 1
 Bases JFD 2
 CTS 4.7.D.4
 STS SR 3.6.1.3.10 and Associated Bases
 ITS SR 3.6.1.3.8 and Associated Bases

CTS 4.7.D.4 verifies that each EFCV is OPERABLE by "verifying that the valve checks flow." The corresponding ITS SR 3.6.1.3.8 verifies that each EFCV activates to its isolation position. The "checks flow" in CTS 4.7.D.4 implies that the flow is stopped with no leakage. The "activates to isolation position" in ITS SR 3.6.1.3.8 only verifies that the EFCV closes, it does not imply that there is no leakage. A closed valve can leak. The justification provided for this Less Restrictive change (DOC L.7) does not provide sufficient information to evaluate this change, and based on the information provided, it can be considered as a change in the current licensing basis. Thus it would be considered as a beyond scope of review item for this conversion. It should be noted that the corresponding STS SR in NUREG 1433 STS SR 3.6.1.3.10 does allow some leakage. If the intent of the STS/ITS SR was just to verify that the valve actuates to the isolation position then STS SR 3.6.1.3.9/ITS SR 3.6.1.3.7 would be sufficient. However this SR verifies the EFCV leakage rate (i.e., no leakage or some leakage) upon actuation. Therefore, the proposed change and the Bases details on how to verify compliance with the SR are unacceptable. See Comment Number 3.6.1.3-9 for concerns with regards to the ACTIONS to be taken upon failure of this SR. **Comment:** Delete this change. See Comment Number 3.6.1.3-5 and 3.6.1.3-9.

ComEd Response:

We do not agree that the term "checks flow" implies that there is no leakage. "Checks flow" simply means that when the valve closes, flow through the valve decreases. The design of the excess flow check valves (EFCVs) is not to have zero leakage when closed; it is only designed to decrease most of the flow

through the valve. As described in DOC L.7, the requirements for the EFCVs are provided in 10 CFR 50 Appendix A, General Design Criteria (GDC) 55 and 56, and guidance is provided in Regulatory Guide 1.11, "Instrument Lines Penetrating Primary Reactor Containment." These requirements and guidance state that there should be a high degree of assurance that the EFCVs will close or be closed if the instrument line outside containment is lost during normal reactor operation, or under accident condition. The proposed SR ensures this requirement, since it requires the EFCV to isolate to the isolation position (i.e., closed) on an instrument line break signal. The CTS requirement does not specifically require the valve to close fully, just to "check flow." Thus, the proposed ITS SR 3.6.1.3.8 ensures the Regulatory Guide 1.11 guidance is met. In addition, DOC L.7 further states that the Updated Final Safety Analysis Report (UFSAR) analysis of an instrument line break does not even assume the valve goes closed; a specific EFCV leakage limit is not an assumption in the analysis. In addition, this change, using a similar DOC, was approved by the NRC during the review of the Nine Mile Point Unit 2 ITS submittal. Therefore, sufficient information is provided in DOC L.7 to justify the change. Additionally, this issue was identified as a beyond scope change in our submittal and is being handled by the NRC Project Manager.

3.6.1.3-7 DOC L.9
(Quad Cities CTS 4.7.A.2 and Associated (b) footnote
only) ITS SR 3.6.1.3.2, SR 3.6.1.3.3 and Associated Bases

CTS 4.7.A.2, its associated (b) Footnote, ITS SR 3.6.1.3.2 and ITS SR 3.6.1.3.3 have been modified to exclude those valves which are locked, sealed or otherwise secured from the closure verification. This change implements TSTF-45. While the change to the ITS SRs is in accordance with the TSTF, the Bases changes are not in accordance with TSTF-45 Rev.2. **Comment:** Licensee should revise its submittal to conform to TSTF-45 Rev.2.

ComEd Response:

The Quad Cities 1 and 2 Bases for ITS SRs 3.6.1.3.2 and 3.6.1.3.3 will be revised to conform the TSTF-45, Rev. 2, as reflected in the Dresden 2 and 3 Bases for ITS SRs 3.6.1.3.2 and 3.6.1.3.3.

3.6.1.3-8 JFD 2
 Bases JFD 8
 STS SR 3.6.1.3.13 and Associated Bases
 ITS SR 3.6.1.3.10 and Associated Bases

STS B3.6.1.3 Bases-SR 3.6.1.3.13 describes a Note 1 that is added to STS SR 3.6.1.3.13. STS SR 3.6.1.3.13 does not contain such a Note, however, BWR 16 justification C.5, approved by the staff, added this Note to STS SR 3.6.1.3.13. It was inadvertently omitted in Revision 1 to the NUREGs. TSB 13 has been generated to

correct this problem. ITS B3.6.1.3 Bases SR 3.6.1.3.10 deletes this Note description based on Bases JFD 8. This is incorrect. Bases JFD 8 has nothing to do with this Note. A justification similar to JFD 2 would be a more appropriate justification for deleting the Note description. **Comment:** Provide additional discussion and justification for the deletion of this Note description.

ComEd Response:

The Applicability of ITS 3.6.1.3 is "MODES 1, 2, and 3," and "When associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, Primary Containment Isolation Instrumentation." ISTS SR 3.6.1.3.13 applies only to main steam isolation valves. Main steam isolation valves have no associated instrumentation requirements in MODES or conditions other than MODES 1, 2 and 3. Therefore, the Applicability of the ITS 3.6.1.3 for main steam isolation valves is MODES 1, 2, and 3. In accordance with SR 3.0.1, "SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Therefore, the proposed change is unnecessary and inconsistent with the format and presentation of SRs in the rest of the ISTS. It should be noted that JFD 2, not JFD 8, should be the proper annotation for this deviation.

3.6.1.3-9 JFD 3
 JFD 4 (Quad Cities)
 JFD 11 (Dresden)
 Bases JFD 2
 Bases JFD 6
 STS 3.6.1.3 ACTIONS A, B, C, D and Associated Bases
 ITS 3.6.1.3 ACTIONS A, B, C, D and Associated Bases

STS 3.6.1.3 ACTIONS A, B, C, D and their associated Bases have been modified by TSTF-207 Rev.4 to provide the appropriate ACTIONS for specific PCIV leakage. ITS 3.6.1.3 ACTIONS A, B, C, D and their associated Bases have been modified to only address MSIV leakage. If this was the only leakage of concern, then the change and deviations from TSTF-207 would be acceptable. However, in light of Comment Number 3.6.1.3-6, ITS 3.6.1.3 ACTIONS A, B, C, D and their associated Bases need to be revised in accordance with TSTF-207 Rev.4 to also address EFCV leakage. **Comment:** Licensee should revise its submittal (both CTS and ITS) to conform to TSTF-207 Rev.4 to account for the ACTIONS to be taken for excessive EFCV leakage. Provide the appropriate discussions and justification for this change. See Comment Number 3.6.1.3-6.

ComEd Response:

As previously stated in the response to NRC Comment 3.6.1.3-6, the CTS do not specify a leakage limit and the UFSAR analysis of an instrument line break does not even assume the EFCV goes closed; a specific leakage limit is not an

assumption in the analysis. Therefore, the only leakage of concern in ITS 3.6.1.3 is MSIV leakage. Therefore, providing specific ACTIONS for excessive EFCV leakage is not appropriate.

The ITS submittal will be revised to be consistent with TSTF-207, Rev. 5, except where plant-specific differences apply or where typographical/consistency errors are noted.

3.6.1.3-10 Bases JFD 1
(Quad Cities STS 3.6.1.3 Bases - APPLICABLE SAFETY ANALYSES
only) ITS B3.6.1.3 Bases - APPLICABLE SAFETY ANALYSES

STS B3.6.1.3 Bases - APPLICABLE SAFETY ANALYSES states the following in the first sentence of the second paragraph: "The DBAs... are a LOCA and a main steam line break (MSLB)." Quad Cities ITS B3.6.1.3 Bases - APPLICABLE SAFETY ANALYSES modifies this sentence by deleting the "and" and adding "Refs. 2 and 3, respectively" after "(MSLB)." The sentence as modified in the ITS does not make sense. **Comment:** Correct this discrepancy.

ComEd Response:

The discrepancy will be corrected.

3.6.1.3-11 Bases JFD 5
Bases JFD 11
STS 3.6.1.3 ACTION C and Associated Bases
ITS 3.6.1.3 ACTION C and Associated Bases

ITS 3.6.1.3 ACTION C and its associated Bases modifies STS 3.6.1.3 ACTION C and its associated Bases to incorporate TSTF-30. While the changes to ITS 3.6.1.3 ACTION C are in accordance with the TSTF, the Bases changes are not in accordance with TSTF-30, Rev.3. **Comment:** Licensee should revise its submittal to conform to TSTF-30 Rev.3.

ComEd Response:

We will revise the submittal to be consistent with TSTF-30, Rev. 3, except where plant specific differences apply or where typographical/consistency errors are noted.

3.6.1.3-12 Bases JFD 6
(Quad Cities STS SR 3.6.1.3.2 and Associated Bases
only) ITS SR 3.6.1.3.1 and Associated Bases

ITS SR 3.6.1.3.1 modifies STS SR 3.6.1.3.2 Note 2 by adding the following at the end of the Note: "provided the drywell...purge valves are not open simultaneously." ITS B3.6.1.3 Bases - SR 3.6.1.3.1 modifies the STS words describing Note 2 by adding similar words to the Bases discussion. However, the Bases words end as follows: "purge valves are closed." The Bases words are confusing in that they imply that the valves are always closed and not allowed to be open which is not what the ITS SR Note says. It should be noted that the Dresden modification mimics the ITS SR 3.6.1.3.1 Note 2 words and thus is acceptable. **Comment:** Correct this discrepancy.

ComEd Response:

The Quad Cities 1 and 2 Bases for ITS SR 3.6.1.3.1 will be revised to be consistent with the Dresden 2 and 3 Bases for ITS SR 3.6.1.3.1.

3.6.1.3-13 CTS 3.7.A ACTIONS
 CTS 4.7.A.2
 ITS 3.6.1.3 ACTIONS
 ITS SR 3.6.1.3.2, SR 3.6.1.3.3 and Associated Bases

CTS 4.7.A.2 verifies that all penetrations not capable of being closed by OPERABLE automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions. The corresponding ITS SRs for this CTS surveillance are ITS SR 3.6.1.3.2 for valves outside containment and ITS SR 3.6.1.3.3 for valves inside containment. If CTS 4.7.A.2 cannot be met, the ACTIONS of CTS 3.7.A are entered which require restoration of valve OPERABILITY within 1 hour or shutdown within the following 36 hours. If ITS SR 3.6.1.3.2 or ITS SR 3.6.1.3.3 cannot be met, the ACTIONS of ITS 3.6.1.3 are entered which allows for one valve inoperable between 4 hours and 72 hours depending on the type of penetration to restore valve OPERABILITY before shutdown commences. This Less Restrictive (L) change to the CTS is not justified. **Comment:** Revise the CTS markup to show this Less Restrictive change and provide the appropriate discussions and justifications.

ComEd Response:

If a valve is open that is not allowed to be open, the Actions of CTS 3.7.D are entered, not the Actions of CTS 3.7.A. CTS LCO 3.7.A requires PRIMARY CONTAINMENT INTEGRITY to be maintained. The CTS definition of PRIMARY CONTAINMENT INTEGRITY states, in part, that PRIMARY CONTAINMENT INTEGRITY exists when "All primary containment penetrations required to be closed under accident conditions are ... Closed by at least one manual valve, blind flange, or de-activated automatic valve secured in its closed position, except for valves that are open under administrative control as permitted by Specification 3.7.D." Thus, when one of the two manual valves in the penetration is open, PRIMARY CONTAINMENT INTEGRITY is still met, since one valve is still closed, and the Actions of CTS 3.7.A do not have to be entered. With one of two

valves open when not allowed by CTS 3.7.D footnote a, this valve would be declared inoperable and the Actions of CTS 3.7.D entered. CTS 3.7.D allows 4 hours to isolate the affected penetration. ISTS 3.6.1.3 ACTIONS are consistent with this 4 hour allowance, except where justified (the change to 72 hours for some valves is justified in DOCs L.1 and L.8). Therefore, since the current time in the CTS to isolate a valve is consistent with the proposed time in the ITS to isolate a valve, except where previously justified in DOCs L.1 and L.8, no additional justification is necessary. This is consistent with the ComEd interpretation of the requirement.

3.6.1.4 Drywell Pressure

3.6.1.4-1 Bases JFD 1

(Quad Cities only) STS B3.6.1.4 Bases - APPLICABLE SAFETY ANALYSES
ITS B3.6.1.4 Bases - APPLICABLE SAFETY ANALYSES

The last sentence in the second paragraph of ITS B3.6.1.4 states the following: "The calculated peak drywell pressure for this limiting event is 47 psig (Ref.1)." In the STS the number used is "[57.5]" which is the number used in ITS B3.6.1.1 as the maximum peak containment pressure (P_a). Dresden and Quad Cities both specify in the CTS and ITS the same valve for P_a which is 48 psig. This same sentence in the Dresden ITS markup uses the P_a valve of 48 psig. Comment: Provide a discussion and justification as to why the Quad Cities valve is different than its P_a valve.

ComEd Response:

The P_a value in the CTS for Quad Cities 1 and 2 is a conservative value (i.e., 48 psig) when compared to the peak containment pressure analysis result (i.e., 47 psig) reported in Quad Cities 1 and 2 UFSAR Section 6.2.1.3.2.

3.6.1.6 Low Set Relief Valves

3.6.1.6-1 DOC A.3
JFD 2
JFD 4
Bases JFD 2
Bases JFD 3
CTS 4.6.F
ITS SR 3.6.1.6.1, SR 3.6.1.6.2 and Associated Bases

See Comment Number 3.6.0-1. Comment: See Comment Number 3.6.0-1.

ComEd Response: None

3.6.1.7 Reactor Building-to-Suppression Chamber Vacuum Breakers

3.6.1.7-1 DOC A.2
 DOC L.1
 CTS 3.7.F ACTIONS
 ITS 3.6.1.7 ACTION Note

CTS 3.7.F ACTIONS is modified to add ITS 3.6.1.7 ACTION Note which specifies separate condition entry is allowed for each line. This change is characterized as an Administrative change (DOC A.2). DOC A.2 states that the change is considered Administrative since this allowance is consistent with an unstated assumption in the CTS. The wording of CTS 3.7.F ACTIONS does not seem to allow for separate condition entry, and the staff cannot determine how this can be concluded from the CTS, particularly when one considers the discussion provided in DOC L.1. Thus, the staff considers this change to be a Less Restrictive (L) change. **Comment:** Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.

ComEd Response:

ITS 3.6.1.7 DOC L.1 will be revised to address the addition of the Note allowing separate condition entry for each line.

3.6.1.7-2 DOC A.3
 DOC L.3 (Section 3.6.1.8)
 CTS 4.7.F.1
 ITS SR 3.6.1.7.1 Note 1

CTS 4.7.F.1 requires that the vacuum breakers be closed at all times; with no explicit allowance for opening during the performance of required surveillances. Thus opening the vacuum breaker to perform surveillances would result in entry into the appropriate ACTIONS of CTS 3.7.F since the vacuum breaker would be considered inoperable (i.e., not meeting the SR). CTS 4.7.F.1 is modified by ITS SR 3.6.1.7.1 Note 1 to allow opening the vacuum breakers during the performance of required surveillances. This change is designated and justified as an Administrative change (DOC A.3), which is incorrect. The change is a Less Restrictive (L) change, since the vacuum breaker is considered inoperable when open to perform required surveillances. In fact, this same change is made in Section 3.6.1.8 and is characterized as a Less Restrictive (L) change (DOC L.3). **Comment:** Revise the CTS markup and provide additional discussion and justification for this Less Restrictive (L) change.

ComEd Response:

The ITS submittal will be revised to re-categorize this change as "Less Restrictive."

3.6.1.7-3 DOC LD.1
 JFD 2 (Quad Cities)
 JFD 3 (Dresden)
 Bases JFD 2
 CTS 4.7.F.b
 ITS SR 3.6.1.7.3 and Associated Bases

See Comment Number 3.6.0-1 **Comment:** See Comment Number 3.6.0-1.

ComEd Response: None

3.6.1.7-4 DOC L.1
 CTS 3.7.F ACTIONS
 ITS 3.6.1.7 ACTIONS D and E

CTS 3.7.F ACTIONS is modified by the addition of ITS 3.6.1.7 ACTION D. This modification is characterized as a Less Restrictive (L) change (DOC L.1). The discussion and justification provided in DOC L.1 seems to characterize the change as an Administrative change - The CTS ACTIONS to be taken (CTS 3.0.C) and the ITS ACTIONS to be taken (ITS 3.6.1.7 ACTIONS D and E) are equivalent. **Comment:** Provide additional discussion and justification to show that this change is a Less Restrictive (L) change rather than an Administrative change.

ComEd Response:

ITS 3.6.1.7 DOC L.1 will be revised to provide additional discussion and justification.

3.6.1.7-5 Bases JFD 1
 Bases JFD 4
 STS B3.6.1.7 Bases - APPLICABILITY
 ITS B3.6.1.7 Bases - APPLICABILITY

STS B3.6.1.7 Bases - APPLICABILITY justifies the OPERABILITY of the reactor building-to-suppression chamber vacuum breakers in MODES 1, 2, and 3. Two conditions related to excessive negative pressure necessitate this MODE applicability, an inadvertent actuation of the Suppression Pool Spray System and depressurization of the drywell. ITS B3.6.1.7 Bases APPLICABILITY states that depressurization of the drywell could occur due to a primary system rupture. All mention of inadvertent

actuation of the Suppression Pool Spray System has been deleted. Bases JFD 1 and 4 state that inadvertent actuation of the Suppression Pool Spray System is not the main concern. The justification does not adequately address this deletion since it implies that it is a concern in drywell depressurization, just not the main concern. In addition, the change could be considered a potential generic change. **Comment:** Provide additional justification and discussion for this deletion based on current licensing bases, system design or operational constraints.

ComEd Response:

Bases JFD 4 will be modified to state that suppression pool spray cannot cause excessive negative pressure; only drywell spray can cause this event.

3.6.1.7-6 Bases JFD 3
STS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES
ITS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES

STS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES specifies the five cases that were considered in the safety analyses to determine the adequacy of the external vacuum breakers. ITS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES deletes this information entirely. The justification (Bases JFD 3) states that the appropriate analyses are in the UFSAR, and that the discussion in the Bases is not needed. This is incorrect. The discussion is needed in the Bases to provide a degree of understanding on how these technical concerns were addressed at Dresden and Quad Cities. **Comment:** Either retain the STS wording, provide plant-specific wording, or appropriate plant specific references for each of the five STS cases or the plant-specific cases. Provide additional discussion and justification as necessary.

ComEd Response:

The removal of this information from the Bases, using a similar justification as provided in Bases JFD 3, has been previously approved by the NRC during the review of another ITS conversion submittal. However, the appropriate UFSAR references, for the description of the plant-specific cases considered in determining the adequacy of the vacuum breakers, will be added to the Bases.

3.6.1.8 Suppression Chamber-to-Drywell Vacuum Breakers

3.6.1.8-1 LD.1
JFD 1
Bases JFD 2 (Quad Cities)
Bases JFD 3 (Dresdent)
CTS 4.7.E.2.c
ITS SR 3.6.1.8.3 and Associated Bases

See Comment Number 3.6.0-1. **Comment:** See Comment Number 3.6.0-1.

ComEd Response: None

3.6.1.8-2 Bases JFD 2 (Dresden)
Bases JFD 3 (Quad Cities)
Bases JFD 6
STS B3.6.1.8 Bases - APPLICABILITY
ITS B3.6.1.8 Bases - APPLICABILITY

See Comment Number 3.6.1.7-5. **Comment:** See Comment Number 3.6.1.7-5.

ComEd Response:

The applicable Bases JFD states that suppression pool spray cannot cause excessive negative pressure; drywell spray is the system that can cause this event. In addition, this JFD has been reviewed and approved by the NRC in the Nine Mile Point Unit 2 ITS submittal.

3.6.2.1 Suppression Pool Average Temperature

3.6.2.1-1 Bases JFD 6
STS B3.6.2.1 Bases - D.1 and D.2
ITS B3.6.2.1 Bases - D.1, D.2 and D.3

STS B3.6.2.1 Bases - D.1 and D.2 uses the phrase "In this Condition..." ITS B3.6.2.1 Bases - D.1, D.2 and D.3 decapitalizes the "C" in "Condition" and justifies it as a typographical or editorial change. This is incorrect. The condition referred to in the sentence is Condition D and not the system operating or physical condition. Therefore, it should be "Condition" rather than "condition". **Comment:** Correct this discrepancy.

ComEd Response:

The condition referred to in the sentence is not Condition D, but the physical condition. This is essentially a typographical error in the ISTS, and it is being corrected so that it does not conflict with other similar descriptions in the Bases (e.g., ISTS Bases for 3.1.7, 3.4.9, 3.7.3, and 3.7.4). In addition, this change has been reviewed and approved by the NRC in the Nine Mile Point Unit 2 ITS submittal.

3.6.2.2 Suppression Pool Water Level

3.6.2.2-1 Bases JFD 2
STS B3.6.2.2 Bases - A.1
ITS B3.6.2.2 Bases - A.1

The third sentence in STS B3.6.2.2 Bases - A.1 states the following: "If suppression pool water level...capability of the "Drywell Spray System". ITS B3.6.2.2 Bases - A.1

changes "Drywell Spray System" to "Containment Spray System." The ITS does not have a specification for Containment Spray System; however, it does have a specification for a Suppression Pool Spray System in the ITS and a specification for a Suppression Pool Spray System and a Drywell Spray System in the CTS. **Comment:** Correct this discrepancy.

ComEd Response:

The discrepancy will be corrected.

3.6.2.3 Suppression Pool Cooling (Dresden)

Residual Heat Removal (RHR) Suppression Pool Cooling (Quad Cities)

3.6.2.3-1 DOC A.2

(Quad Cities only) CTS 3.7.M ACTION 2 and Associated *Footnote
ITS 3.6.2.3 ACTION C

With both RHR suppression pool cooling subsystems inoperable, CTS 3.7.M ACTION 2 requires the unit to be in COLD SHUTDOWN (MODE 4) within 36 hours. The ACTION statement is modified by a footnote which states that "if unable to attain COLD SHUTDOWN as required by this ACTION, maintain reactor coolant temperature as low as practical by use of alternate heat removal methods." The footnote allows the plant to remain in HOT SHUTDOWN (MODE 3) indefinitely. The CTS markup shows this footnote as being deleted, and justifies the deletion as an Administrative change (DOC A.2). This is incorrect. ITS 3.6.2.3 ACTION C requires being in MODE 4 within 36 hours with no allowance to remain in MODE 3 beyond the 36 hours as allowed by the CTS. Remaining in MODE 3 beyond the 36 hours in the ITS would constitute a violation of TS which is not the case in the CTS. Thus the change is a More Restrictive change. This discussion is also applicable to similar changes made in the CTS markups for ITS 3.6.2.4. See Comment Number 3.6.2.4-1. **Comment:** Revise the CTS markup and provide additional discussion and justification for this More Restrictive change. See Comment Number 3.6.2.4-1.

ComEd Response:

While the CTS footnote appears to allow the unit to remain in MODE 3 for an unlimited amount of time, in reality it only allows the unit to remain in MODE 3 as long as MODE 4 cannot be attained. This is not an unlimited amount of time. Deletion of the footnote does not really take away an allowance that impacts operation of the unit; in the ITS, which does not include the footnote allowance, if sufficient equipment is inoperable such that MODE 4 cannot be attained, then the unit will still be forced to stay in MODE 3. When MODE 4 is not reached in the required time, a violation of Technical Specifications occurs. However, this is not a purposeful or intentional Technical Specifications violation. Thus, the only difference between CTS compliance and ITS compliance is that without the footnote, a report to the NRC may be required by 10 CFR 50.73, "Licensee event report system." However, this report is not a Technical Specifications

requirement, thus there is no change to the Technical Specifications. Therefore, this change should remain as an "Administrative" change.

3.6.2.3-2 **DOC M.1**
 JFD 4 (Quad Cities)
 JFD 5 (Dresden)
 Bases JFD 5
 CTS 4.7.M.2
 ITS SR 3.6.2.3.2 and Associated Bases

CTS 4.7.M.2 verifies that each of the required, LPC1 (Dresden) or RHR (Quad Cities) pumps develops the required recirculation flow when tested. The CTS markup modifies this surveillance to specify a specific flow rate (≥ 5000 gpm) instead of terminology "required recirculation flow." The change is characterized as a More Restrictive change (DOC M.1). It is unclear from the discussions in DOC M.1 and the JFDs as to whether the 5000 gpm limit is the "required recirculation flow" limit or some other limit. If they are the same, or if it can be shown that there is an equivalent correlation between the two limits, then the change is an Administrative change (i.e., a presentation preference). If, however, the 5000 gpm is not the recirculation flow limit, then the change could be a More Restrictive change, or a Less Restrictive (L) change depending on how the 5000 gpm is related to the recirculation flow limit. Furthermore, in this case (limits not equivalent) the change could possibly be a beyond scope of review item for this conversion. **Comment: Provide additional discussion and justification with regards to the relationship between the "required recirculation flow" limit and the 5000 gpm flow limit. Revise the CTS/ITS markup as necessary.**

ComEd Response:

The flow rate value provided for the acceptance criteria of ITS SR 3.6.2.3.2 (i.e., ≥ 5000 gpm) is the "required recirculation flow" value. The change is characterized as a "More Restrictive" change since the specific value will now be specified in the Technical Specifications and will no longer be under licensee control.

3.6.2.3-3 **Bases JFD 1 (Quad Cities)**
 Bases JFD 2 (Dresden)
 STS B3.6.2.3 Bases - SR 3.6.2.3.2
 ITS B3.6.2.3 Bases - SR 3.6.2.3.2

STS B3.6.2.3 Bases - SR 3.6.2.3.2 states that the purpose of this surveillance is to ensure that "pump performance has not degraded during the cycle." ITS B3.6.2.3 Bases - SR 3.6.2.3.2 deletes these words and replaces them with "the primary containment peak pressure and temperature can be maintained below design limits during a DBA." While the ITS words are applicable to total system OPERABILITY,

they have little to do with pump OPERABILITY which is the purpose of the SR and they change the intent of the SR. In addition, the justification used for the deletion is a general justification that deals with plant specific nomenclature, system description, etc., which does not apply in this case. **Comment:** Delete this change.

ComEd Response:

The Bases to ITS SR 3.6.2.3.2 was revised to delete the phrase "pump performance has not degraded during the cycle," since the phrase is not necessarily true. The acceptance criteria for the Surveillance is ≥ 5000 gpm. As long as the pump can develop a flow rate ≥ 5000 gpm, the Surveillance Requirement will be met (no matter how much degradation has occurred in pump performance). Therefore, it is inappropriate to delete this change. This change is also consistent with the change accepted by the NRC in the Nine Mile Point Unit 2 ITS submittal.

3.6.2.3-4 Bases JFD 3 (Quad Cities)
Bases JFD 4 (Dresden)
STS B3.6.2.3 Bases - A.1
ITS B3.6.2.3 Bases - A.1

See Comment Number 3.6.2.1-1. **Comment:** See Comment Number 3.6.2.1-1.

ComEd Response:

See response to NRC Comment 3.6.2.1-1.

3.6.2.3-5 Bases JFD 7
STS B3.6.2.3 Bases - SR 3.6.2.3.2
ITS B3.6.2.3 Bases - SR 3.6.2.3.2

STS B3.6.2.3 Bases - SR 3.6.2.3.2 states the following: "Such inservice inspections confirm component OPERABILITY, trend performance, and detect incipient failures by indicating abnormal performance." ITS B3.6.2.3 Bases - SR 3.6.2.3.2 modifies this sentence by deleting the words "trend performance". The justification for this change (Bases JFD 7) states that the Dresden/Quad Cities IST programs are not required to provide information for trend purposes. The STS Bases discussion does not require that performance be trended, however, it is assumed that specific data is recorded or taken during the pump tests and that if needed, can be used to evaluate pump OPERABILITY over a period time that is trending. The staff believes that the words do not constitute a requirement but provide information on SR use and should be retained. **Comment:** Delete this change.

ComEd Response:

The Bases to ITS SR 3.6.2.3.2 was revised to delete the phrase "trend performance," since the phrase is not true. The SR allows data to be collected so that performance can be trended. However, SR 3.6.2.3.2 does not require trending to be performed. In addition, that the Bases for ISTS SR 3.6.2.3.2, as written, does include a requirement to trend performance which is not included in the Technical Specification Surveillance Requirement. It is inappropriate for the Bases to include requirements beyond those included in the Technical Specifications. Therefore, this change should not be deleted. This change is also consistent with the change accepted by the NRC in the Nine Mile Point Unit 2 ITS submittal.

3.6.2.4 Suppression Pool Spray (Dresden)

Residual Heat Removal (RHR) Suppression Pool Spray (Quad Cities)

3.6.2.4-1 DOC A.2

**(Quad Cities only) CTS 3.7.L ACTION 2 and Associated *Footnote
ITS 3.6.2.4 ACTION C**

See Comment Number 3.6.2.3-1. **Comment:** See Comment Number 3.6.2.3-1.

ComEd Response:

See response to NRC Comment 3.6.2.3-1.

3.6.2.4-2

**DOC R.1
CTS 3.7.L
STS 3.6.2.4 and Associated Bases
ITS 3.6.2.4 and Associated Bases**

CTS 3.7.L specifies the OPERABILITY requirements for the Suppression Pool and Drywell Spray Systems. STS ITS 3.6.2.4 specifies the OPERABILITY requirements for the Suppression Pool Spray. ITS 3.6 does not include the CTS 3.7.L requirements for the Drywell Spray System based on the premise (DOC R.1) that the Drywell Spray System requirements of CTS 3.7.L do not meet the criterion specified in 10 CFR 50.36(c)(2)(ii). This justification is incomplete in that it does not address the other aspects of the Drywell Spray System encompassed by CTS and its use during DBAs. Since this system was in the CTS and by DOC R.1 is used during DBAs, this specification should be included in the ITS. Furthermore, deletion of this specification is considered by the staff as a beyond scope of review item for this conversion. However, STS 3.6.2.4 of NUREG-1433 may not be the appropriate TS in the Dresden/Quad Cities case, STS 3.6.1.7 "RHR Containment Spray System" of NUREG-1434 (BWR-6) may be the more appropriate TS to use. Also, consideration should be given to adding a separate LCO for Drywell Spray System instead of having a combined TS. **Comment:** Revise the CTS/ITS markups to include the Drywell

Spray System requirements of CTS 3.7.L in ITS 3.6. Provide additional discussions and justification for any changes made to the CTS/ITS.

ComEd Response:

While the Drywell Spray System is available for use in the mitigation of accidents, it is not credited for the mitigation of any event or accident in the Dresden 2 and 3 or Quad Cities 1 and 2 safety analyses. In addition, the Drywell Spray System is not considered to be a significant contributor to the reduction of risk. Therefore, the Drywell Spray System does not meet any of the criteria for inclusion in Technical Specifications and will not be included in the ITS. The Drywell Spray System requirements are not included in NUREG-1433. However, if the NRC position is that the relocation of the CTS requirements for the Drywell Spray System is a beyond scope change, then this issue should be treated as a beyond scope change and should be handled by the NRC Project Manager

3.6.2.4-3 JFD 3 (Quad Cities)
JFD 4 (Dresden)
Bases JFD 2 (Dresden)
Bases JFD 3 (Quad Cities)
CTS 4.7.L
CTS 4.7.M
STS SR 3.6.2.4.2 and Associated Bases

CTS 4.7.L does not require an OPERABLE flow path capable of recirculating water from the suppression pool through an RHR heat exchanger and the suppression chamber and drywell spray spargers, except as part of the valve alignment requirement of CTS 4.7.L.1. nor does it verify a minimum required flow rate through a portion of this OPERABLE flow path. STS SR 3.6.2.4.2 would be the corresponding SR if there was a CTS surveillance. By not including STS SR 3.6.2.4.2 in the Dresden/Quad Cities ITS there is no SR to verify pump OPERABILITY with regards to the Suppression Pool Spray System unless one relies on the Suppression Pool Cooling System pump test (ITS SR 3.6.2.3.2). This does not meet the intent of the STS. Therefore, rather than delete the STS SR requirement, the STS SR should be retained; or at least modified to refer to ITS SR 3.6.2.3.2. **Comment: Revise the CTS/ITS markups to include STS SR 3.6.2.4.2 and its Associated Bases or a modification thereof. Provide additional discussion and justification for this change.**

ComEd Response:

Pump testing requirements are included in ITS 5.5.6, "Inservice Testing Program." These requirements are applicable to the subject pumps and are adequate to ensure pump OPERABILITY is verified. Therefore, no change is required to the proposed Surveillance Requirements of ITS 3.6.2.4.

- 3.6.2.4-4 Bases JFD 1 (Quad Cities)
Bases JFD 2 (Dresden)
STS B3.6.2.4 Bases - B.1
ITS B3.6.2.4 Bases - B.1

STS B3.6.2.4 Bases - B.1 states that one of the bases for the 8 hour Completion Time is that there are alternate methods to remove heat from the primary containment. ITS B3.6.2.4 Bases - B.1 modifies this bases to reflect the alternate methods to reduce pressure rather than remove heat. Since the purpose of the suppression pool spray as stated in STS/ITS B3.6.2.4 Bases - BACKGROUND is to remove heat, not to reduce pressure, from the primary containment, the basis for allowing the 8 hour Completion Time in STS/ITS B3.6.2.4 Bases - B.1 is the availability of these other methods of removing heat. **Comment: Delete this change.**

ComEd Response:

This change was previously accepted by the NRC in the Nine Mile Point Unit 2 ITS submittal. The Bases states that heat addition increases pressure. Therefore, the alternate methods must be capable of reducing pressure.

-
- 3.6.2.4-5 Bases JFD 2 (Quad Cities)
Bases JFD 3 (Dresden)
STS B3.6.2.4 Bases - A.1 and B.1
ITS B3.6.2.4 Bases - A.1 and B.1

See Comment Number 3.6.2.1-1. **Comment: See Comment Number 3.6.2.1-1.**

ComEd Response:

See response to NRC Comment 3.6.2.1-1.

3.6.4.1 Secondary Containment

- 3.6.4.1-1 DOC A.11 (Section 1.0)
JFD 2
Bases JFD 3
CTS 1.0 SECONDARY CONTAINMENT INTEGRITY item b.
CTS 3.7.N and 4.7.N.2.b
STS SR 3.6.4.1.2 and Associated Bases

STS SR 3.6.4.1.2 verifies all secondary containment equipment hatches are closed and sealed. ITS 3.6.4.1 does not include this STS SR. The justification used (JFD 2) states that this particular surveillance was not added during the Technical Specification Upgrade Program of 1995. The staff does not believe this is entirely correct, based on two items. The CTS definition is part of TS requirements and can specify indirectly or directly SR or OPERABILITY requirements that must be met. In

this case, the definition of SECONDARY CONTAINMENT INTEGRITY Item b in CTS 1.0 specifies that for SECONDARY CONTAINMENT INTEGRITY to exist - "All secondary containment equipment hatches and blowout panels are closed and sealed." This definition, along with CTS 4.7.N, would require that the equipment hatches and blowout panels be verified closed at some periodic interval or point in time. However, the staff interpretation of CTS 4.7.N.2.b would seem to require this inspection every 31 days. In the old BWR/4 and BWR/6 STS the corresponding surveillance to CTS 4.7.N.2.b normally only applied to penetrations that could be closed by valves or blind flanges, and the words were explicate as to how the penetrations could be isolated or closed (i.e., by automatic valves or dampers, manual valves, blind flanges, or deactivated automatic valves secured in position). In CTS 4.7.N.2.b no mention is made as to how penetrations other than those containing automatic dampers are to be closed. Since the equipment hatches and blowout panels are secondary containment penetrations, it seems that the intent was that CTS 4.7.N.2.b was to apply to these penetrations. Therefore, STS SR 3.6.4.1.2 is required to be included in ITS 3.6.4.1. **Comment:** Revise the CTS/ITS markups and provide the appropriate discussions and justifications for adding STS SR 3.6.4.1.2 and its associated Bases.

ComEd Response:

The Technical Specifications Upgrade Program (TSUP) was primarily based on the Standard Technical Specifications included in NUREG-0123, "Standard Technical Specifications for General Electric Boiling Water Reactors." At the time of the TSUP, NUREG-0123 included Surveillance Requirement 4.6.5.1.b.1, which required all secondary containment equipment hatches to be verified closed and sealed every 31 days. As stated in JFD 2, this particular surveillance was not added for Dresden 2 and 3 and Quad Cities 1 and 2 during the TSUP of 1995. Therefore, Dresden 2 and 3 and Quad Cities 1 and 2 choose to maintain their current licensing basis, previously approved by the NRC and reflected in the CTS, and not add ISTS 3.6.4.1.2 to their ITS.

3.6.4.1-2 DOC LD.1
 JFD 1
 Bases JFD 1
 CTS 4.7.N.3
 ITS SR 3.6.4.1.3 and Associated Bases

See Comment Number 3.6.0-1. **Comment:** See Comment Number 3.6.0-1.

ComEd Response: None

3.6.4.1-3 Bases JFD 4
 STS B3.6.4.1 Bases - C.1, C.2 and C.3
 ITS B3.6.4.1 Bases - C.1, C.2 and C.3

The third paragraph last sentence in STS B3.6.4.1 Bases - C.1, C.2 and C.3 states the following: "Therefore, in either case, inability to suspend movement... a reactor shutdown." ITS B3.6.4.1 Bases - C.1, C.2 and C.3 deletes this sentence and replaces it with "Insert C.1, C.2, and C.3." The insert does not seem to make sense, is confusing and the justification (Bases JFD 4) describes the change as a consistency change with other specifications. The staff finds that this change is not consistent with other STS Bases and that the STS wording is correct. **Comment:** Delete this change.

ComEd Response:

These words, which describe the purpose and meaning of an ACTIONS Note, were modified to be consistent with a request by the NRC during the review and approval phase of a recent BWR/4 ITS submittal. We agreed with the change because the existing words were confusing. As a result, these words have been modified in the Dresden 2 and 3 and Quad Cities 1 and 2 ITS Bases in all Bases locations that describe a similar Note. This change has been approved by the NRC in all other cases. Therefore, to maintain consistency with all other places where this type of Note is described, these words should be accepted. We have re-reviewed the words and find that they are not changing the intent of the Note (i.e., the modification is administrative) and that the words are not confusing.

3.6.4.1-4 CTS 3.7.N ACTION 2
 ITS 3.6.4.1 ACTION C and Associated Bases

CTS 3.7.N ACTION 2 specifies the remedial actions to be taken for an inoperable secondary containment when in OPERATIONAL MODE* (when handling irradiated fuel in secondary containment, during CORE ALTERATIONS and operations with a potential for draining the reactor vessel (OPDRVs)). These ACTIONS are modified by the statement that the provisions of CTS 3.0.C are not applicable and it applies to all of OPERATIONAL MODE*. The corresponding ITS ACTION is ITS 3.6.4.1 ACTION C. ITS 3.6.4.1 ACTION C also has a Note specifying that the provisions of ITS LCO 3.0.3 are not applicable, but this Note specifying that the provision of ITS LCO 3.0.3 are not applicable, but this Note only applies to the movement of irradiated fuel assemblies and not to CORE ALTERATIONS and OPDRVs. No justification is provided for this More Restrictive change. **Comment:** Revise the CTS markup and provide the appropriate discussion and justification for this More Restrictive change.

ComEd Response:

This is not a "More Restrictive" change since it is not possible to perform CORE ALTERATIONS or Operations with the Potential for Draining the Reactor Vessel (OPDRVs) in MODE 1, 2, or 3. CTS 3.0.C and ITS LCO 3.0.3 are only applicable in MODES 1, 2, and 3. Therefore, no change to the ITS submittal is necessary.

3.6.4.2 Secondary Containment Isolation Valves (SCIVs)

3.6.4.2-1 DOC A.3
 CTS 3.7.N ACTIONS
 CTS 3.7.0 ACTIONS
 ITS 3.6.4.2 ACTIONS Notes 2 and 3

CTS 3.7.0 ACTIONS are modified by the addition of ITS 3.6.4.2 ACTIONS Notes 2 and 3. This change is characterized as an Administrative change (DOC A.3). While this change is acceptable for CTS 3.7.0, it still needs to be addressed for the changes imposed on CTS 3.7.N as a result of Comment Number 3.6.4.2-7. For that change, while the addition of ITS 3.6.4.2 ACTIONS Note 3 is still an Administrative change, the addition of ITS 3.6.4.2 ACTIONS Note 2 becomes a Less Restrictive (L) change, because nothing in the ACTION statements of 3.7.N imply separate condition entry. **Comment:** Revise the CTS markup and provide the appropriate discussions and justifications for these Administrative and Less Restrictive (L) changes. See Comment Number 3.6.4.2-7.

ComEd Response:

If a valve is open that is not allowed to be open, the Actions of CTS 3.7.O are entered, not the Actions of CTS 3.7.N. CTS LCO 3.7.N requires SECONDARY CONTAINMENT INTEGRITY to be maintained. The CTS definition of SECONDARY CONTAINMENT INTEGRITY, states, in part, that SECONDARY CONTAINMENT INTEGRITY exists when "All secondary containment penetrations required to be closed during accident conditions are ... Closed by at least one manual valve, blind flange, or de-activated automatic damper secured in its closed position, except as permitted by Specification 3.7.O." Thus, when one of the two manual valves in a penetration is open, SECONDARY CONTAINMENT INTEGRITY is still met, since one valve is still closed, and the Actions of CTS 3.7.N do not have to be entered. With one of the two valves open, this valve would be declared inoperable and the Actions of CTS 3.7.O would be entered. Therefore, CTS 3.7.O does apply to devices addressed in CTS 4.7.N.b. Separate Condition entry for each penetration flow path is allowed in CTS 3.7.O, therefore, DOC A.3 is sufficient to address the devices in CTS 4.7.N.b and no additional justification is necessary. This is consistent with the ComEd interpretation of the requirement.

3.6.4.2-2 DOC A.4
 CTS 3.7.0 ACTION
 ITS 3.6.4.2 ACTION A

CTS 3.7.0 ACTION requires that with one or more secondary containment isolation dampers inoperable, one maintains at least one damper OPERABLE in each affected penetration that is open. The CTS markup deletes this requirement (maintain OPERABLE damper). This change is characterized as an Administrative change (DOC A.4). DOC A.4 states that CTS 3.7.0 ACTION does not specify whether a penetration has one or two valves, and that ITS 3.6.4.2 ACTION A only applies if one valve in a penetration is inoperable. While these statements are correct, DOC A.4 also states that "This inherently ensures maintaining' at least one isolation valve OPERABLE'." This is incorrect. CTS 3.7.0 ACTION applies to penetrations with one isolation valve or two isolation valves. If the penetration with one valve has an inoperable valve, CTS 3.7.0 requires an immediate shutdown if in MODES 1, 2, and 3 or suspension of certain activities if in OPERATIONAL MODE* because one cannot maintain at least one OPERABLE valve in the penetration. ITS 3.6.4.2 ACTION A would allow 8 hours to isolate the penetration before requiring a shutdown or suspension of activities. Thus, ITS 3.6.4.2 ACTION A would allow the use of CTS 3.7.0 ACTIONS "either 1, 2, and 3" for penetrations with one valve. Thus the change is a Less Restrictive (L) change. **Comment:** Revise the CTS markup and provide the appropriate discussions and justifications for this Less Restrictive (L) change.

ComEd Response:

The ITS submittal will be revised to include a "Less Restrictive" DOC for this change.

3.6.4.2-3 DOC LD.1
 JFD 1
 Bases JFD 2
 CTS 4.7.0.2
 ITS SR 3.6.4.2.3 and Associated Bases

See Comment Number 3.6.0-1. **Comment:** See Comment Number 3.6.0-1.

ComEd Response: None

3.6.4.2-4 Bases JFD 1
 STS B3.6.4.2 Bases - APPLICABILITY
 ITS B3.6.4.2 Bases - APPLICABILITY

The last sentence in the second paragraph of STS B3.6.4.2 Bases - APPLICABILITY states the following: "Moving irradiated fuel assemblies in the [primary or secondary containment] may also occur in MODES 1, 2, 3." ITS B3.6.4.2 Bases -

APPLICABILITY deletes this sentence. Based on descriptions in STS/ITS B3.6 Bases the staff concludes that this is a true statement for secondary containment at Dresden and Quad Cities and clarifies the paragraph discussion. Thus it should not have been deleted. In addition, the justification used for the deletion (Bases JFD 1) is inadequate. **Comment:**
Delete this change.

ComEd Response:

While this statement in the ISTS 3.6.4.2 Applicability Bases is true, it is unnecessary to be stated in the Bases. This statement is also true for ISTS 3.6.4.1, Secondary Containment, and ISTS 3.6.4.3, Standby Gas Treatment System, which have the identical Applicability; however, it is not stated in the ISTS Applicability Bases for these two Specifications. Therefore, this statement was not included in the ITS 3.6.4.2 Applicability Bases in order to make the Applicability Bases for all three secondary containment related specifications the same, with respect to this issue. The JFD identified for this change should have been JFD 4 (i.e., change made for consistency with similar phrases in other parts of the Bases). The ISTS markup will be revised to show JFD 4 as the proper justification.

3.6.4.2-5 Bases JFD 4
 STS B3.6.4.2 Bases - D.1, D.2 and D.3
 ITS B3.6.4.2 Bases - D.1, D.2 and D.3

See Comment Number 3.6.4.1-3. **Comment:** See Comment Number 3.6.4.1-3

ComEd Response:

See response to NRC Comment 3.6.4.1-3.

3.6.4.2-6 Bases JFD 7
 Bases JFD 8
 STS B3.6.4.2 Bases - LCO
 ITS B3.6.4.2 Bases - LCO

The third paragraph of the Bases discussion of the LCO for STS 3.6.4.2 states "The normally closed isolation valves ... are those listed in Reference 3." This paragraph deals with those secondary containment isolation valves that are required to be closed during an accident and are in the closed position during normal operation. This paragraph has been modified in the ITS based on Bases JFD 8 which states that the discussion of the valves is incomplete and misleading. While the majority of the changes are acceptable, the change associated with Bases JFD 7 is not. Bases JFD 7 deletes the reference to the condition of normally closed automatic valves. The basis for the deletion is that these valves would be considered inoperable. This would

be true if these valves were closed as a result of ITS 3.6.4.2 ACTION A or B, but the automatic valves of concern in this paragraph are those valves that are normally closed during normal operations and required to be closed during accidents. The paragraph in this case should be modified like the similar paragraph in ITS B3.6.1.3 Bases - LCO. **Comment:** Revise the ITS markup and provide the appropriate discussions and justifications in accordance with the above discussion.

ComEd Response:

The Dresden 2 and 3 and Quad Cities 1 and 2 designs do not include automatic secondary containment isolation valves that are normally de-activated and secured in the closed position. Therefore, Bases JFD 7 is correct and no change is necessary.

3.6.4.2-7 CTS 3.7.N ACTIONS
 CTS 4.7.N.2.b
 ITS 3.6.4.2 ACTIONS
 ITS SR 3.6.4.2.1 and Associated Bases

CTS 4.7.N.2.b verifies that all penetrations not capable of being closed by OPERABLE automatic isolation valves and required to be closed during accident conditions are closed. The corresponding ITS SR for this CTS surveillance is ITS SR 3.6.4.2.1. If CTS 4.7.N.2.b cannot be met, the ACTIONS of CTS 4.7.N. are entered which require restoration of valve OPERABILITY within 4 hours or shutdown within the following 36 hours when in MODES 1, 2, or 3 or immediate suspension of fuel handling, CORE ALTERATIONS and OPDRVs when in OPERATIONAL MODE*. If ITS SR 3.6.4.2.1 cannot be met, the ACTIONS of ITS 3.6.4.2 are entered which allows for one valve to be inoperable for up to 8 hours before shutdown commences or suspension of fuel handling, CORE ALTERATION or OPDRVs. This Less Restrictive (L) change to the CTS is not justified. See Comment Numbers 3.6.4.2-1 and 3.6.4.2-8. **Comment:** Revise the CTS markup to show this Less Restrictive (L) change and provide the appropriate discussions and justifications. See Comment Numbers 3.6.4.2-1 and 3.6.4.2-8.

ComEd Response:

If a valve is open that is not allowed to be open, the Actions of CTS 3.7.O are entered, not the Actions of CTS 3.7.N. CTS LCO 3.7.N requires SECONDARY CONTAINMENT INTEGRITY to be maintained. The CTS definition of SECONDARY CONTAINMENT INTEGRITY, states, in part, that SECONDARY CONTAINMENT INTEGRITY exists when "All secondary containment penetrations required to be closed during accident conditions are ... Closed by at least one manual valve, blind flange, or de-activated automatic damper secured in its closed position, except as permitted by Specification 3.7.O." Thus, when one of the two manual valves in a penetration is open, SECONDARY CONTAINMENT INTEGRITY is still met, since one valve is still closed, and the

Actions of CTS 3.7.N do not have to be entered. With one of the two valves open, this valve would be declared inoperable and the Actions of CTS 3.7.O would be entered. CTS 3.7.O allows 8 hours to isolate the affected penetration. ISTS 3.6.4.2 ACTIONS are consistent with this 8 hour allowance. Therefore, since the current time in the CTS to isolate a valve is consistent with the proposed time in the ITS to isolate a valve, no additional justification is necessary. This is consistent with the ComEd interpretation of the requirement.

**3.6.4.2-8 CTS 3.7.N ACTION 2
CTS 3.7.O ACTION
ITS 3.6.4.2 ACTION D and Associated Bases**

See Comment Number 3.6.4.1-4. Comment: See Comment Number 3.6.4.1-4.

ComEd Response:

This is not a "More Restrictive" change since it is not possible to perform CORE ALTERATIONS or Operations with the Potential for Draining the Reactor Vessel (OPDRVs) in MODE 1, 2, or 3. CTS 3.0.C and ITS LCO 3.0.3 are only applicable in MODES 1, 2, and 3. Therefore, no change to the ITS submittal is necessary.

3.6.4.3 Standby Gas Treatment (SGT) System

**3.6.4.3-1 DOC LA.2
CTS 4.7.P.1 and 4.7.P.4.b.(1)
ITS SR 3.6.4.3.1 SR 3.6.4.3.3 and Associated Bases**

CTS 4.7.P.1 and 4.7.P.4.b.(1) specify that these surveillances be performed by using the manual initiation from the control room. The corresponding ITS SRs are ITS SR 3.6.4.3.1 and SR 3.6.4.3.3 respectively. The CTS markup shows this requirement as being relocated to the Bases by DOC LA.2. The ITS Bases markup shows this requirement has been relocated to ITS B3.6.4.3 Base - SR 3.6.4.3.1 only. CTS 4.7.P.4.b and ITS SR 3.6.4.3.3 are a system functional test, while CTS 4.7.P.1 and ITS SR 3.6.4.3.1 only verify that the fan and heaters operate. It is unclear from the CTS markup, DOC LA.2 and the ITS Bases, whether all manual initiations from the control room will perform the functional test (i.e., start fan and automatically align system). If this is the case, then the question is moot. However, if this is not the case, then the manual initiation requirement needs to be added or addressed in ITS B3.6.4.3 Bases - SR 3.6.4.3.3 or a justification needs to be provided justifying its deletion. Comment: Provide the appropriate discussion and justification for the above concern. Revise the ITS Bases markup, as appropriate.

ComEd Response:

The performance of ITS SR 3.6.4.3.1 satisfies the requirement of CTS 4.7.P.4.b(1). Therefore, DOC LA.2 will be modified to state that the CTS 4.7.P.4.b(1) requirement is performed as part of ITS SR 3.6.4.3.1.

3.6.4.3-2 DOC LD.1
 JFD 1
 Bases JFD 2
 CTS 4.7.P.4
 ITS SR 3.6.3.4.3.3 and Associated Bases

See Comment Number 3.6.0-1. **Comment:** See Comment number 3.6.0-1.

ComEd Response: None

3.6.4.3-3 Bases JFD 3
 STS B3.6.4.3 Bases - A.1
 ITS B3.6.4.3 Bases - A.1

See Comment Number 3.6.2.1-1. **Comment:** See Comment Number 3.6.2.1-1.

ComEd Response:

See response to NRC Comment 3.6.2.1-1.

3.6.4.3-4 Bases JFD 3
 STS B3.6.4.3 Bases - C.1, C.2.1, C.2.2, and C.2.3
 STS B3.6.4.3 Bases - E.1, E.2, and E.3
 ITS B3.6.4.3 Bases - C.1, C.2.1, C.2.2 and C.2.3
 ITS B3.6.4.3 Bases - F.1, F.2, and F.3

See Comment Number 3.6.4.1-3. **Comment:** See Comment Number 3.6.4.1-3.

ComEd Response:

See response to NRC Comment 3.6.4.1-3.

3.6.4.3-5 CTS 3.7.P ACTION 3
 ITS 3.6.4.3 ACTION F and Associated Bases

See Comment Number 3.6.4.1-4. **Comment:** See Comment Number 3.6.4.1-4.

ComEd Response:

This is not a "More Restrictive" change since it is not possible to perform CORE ALTERATIONS or Operations with the Potential for Draining the Reactor Vessel (OPDRVs) in MODE 1, 2, or 3. CTS 3.0.C and ITS LCO 3.0.3 are only applicable in MODES 1, 2, and 3. Therefore, no change to the ITS submittal is necessary.

**REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.6
LASALLE**

3.6 General

3.6.0-1 DOC LD.1 (Sections 3.6.1.1, 3.6.1.3, 3.6.1.6, 3.6.3.1, 3.6.4.1, 3.6.4.2 and 3.6.4.3)
JFD 1 (Sections 3.6.4.1, 3.6.4.2, and 3.6.4.3)
JFD 2 (Section 3.6.1.6)
JFD 3 (Section 3.6.1.1, and 3.6.3.1)
JFD 6 (Section 3.6.1.3)
JFD 9 (Section 3.6.1.3)
Bases JFD 2 (Sections 3.6.1.3, 3.6.1.6, 3.6.3.1, and 3.6.4.3)
Bases JFD 3 (Section 3.6.1.1, and 3.6.4.2)
Bases JFD 4 (Section 3.6.4.1)
Bases JFD 7 (Section 3.6.1.3)
CTS 4.6.2.1.d, 4.6.3.2, 4.6.3.4, 4.6.3.5.b, 4.6.4.1.b.2, 4.6.5.1.c, 4.6.5.2.b,
4.6.5.3.d.2, 4.6.6.1.b, and 4.6.6.1.c
ITS 3.6.1.1, 3.6.1.3, 3.6.1.6, 3.6.3.1, 3.6.4.1, 3.6.4.2, 3.6.4.3 and associated
Bases

The frequencies for performing various CTS surveillances is specified as 18 months or refueling outages. The CTS and ITS markups change these frequencies to 24 months to accommodate a 24 month fuel cycle. The changes are justified by the DOCs and JFDs specified above. This change is considered as a beyond scope of review item for this conversion which is being independently reviewed by the staff. **Comment: None.**

ComEd Response: None.

3.6.1.1 Containment

3.6.1.1-1 DOC A.6
DOC LA.1
DOC L.3
JFD 3
Bases JFD 3
CTS 3.6.2.1.b and 4.6.2.1.d
NUREG-1433 SR 3.6.1.1.2 and Associated Bases
ITS SR 3.6.1.1.3 and Associated Bases

CTS 3.6.2.1.b and 4.6.2.1.d specify that the bypass leakage between the suppression chamber and drywell be less than or equal to 10% of the acceptable A/\sqrt{K} design valve of 0.03ft^2 when tested at a differential pressure of 1.5 psid. ITS SR 3.6.1.1.3 specifies that the drywell-to-suppression chamber bypass leakage be less than or equal to the bypass leakage limits, with the actual limits being specified in the Bases for SR 3.6.1.1.3. The leakage limits specified in the Bases differ from the CTS limits and requirements in that the CTS requirements have to be met during the first unit startup following bypass

leakage testing. At all other times the bypass leakage must be less than or equal to the acceptable A/\sqrt{K} design value of 0.03 ft^2 assumed in the safety analysis, which is different than the CTS limits by approximately 10%. NUREG-1433 STS SR 3.6.1.1.2 specifies the bypass limits directly in the SR not in the Bases. The staff concludes that the proposed change is not only a beyond scope of review item for this conversion (change in bypass leakage limits), but also a generic change (movement of limits to Bases). In addition, based on the discussion provided in DOCs A.6, LA.1 and L.3 with regards to the bypass leakage limit changes (two leakage limits-initial test limit and at other times limit- versus one limit at all times.) The staff also concludes that the beyond scope item would be considered as a generic change. **Comment: Delete these generic changes.**

ComEd Response:

This issue has been identified as a beyond scope change in our submittal and is being processed by the NRC Project Manager.

3.6.1.1-2 DOC LD.1
 JFD 3
 Bases JFD 3
 CTS 4.6.2.1.d
 ITS SR 3.6.1.1.3 and Associated Bases

See Comment Numbers 3.6.0-1 and 3.6.1.1-3. **Comment: See Comment Numbers 3.6.0-1 and 3.6.1.1-3.**

ComEd Response:

See responses to NRC Comments 3.6.0-1 and 3.6.1.1-3.

3.6.1.1-3 DOC LD.1
 DOC L.2
 DOC L.3
 DOC L.4
 JFD 3
 Bases JFD 3
 CTS 4.6.2.1.d
 NUREG-1433 STS SR 3.6.1.1.2 and Associated Bases
 ITS SR 3.6.1.1.3 and Associated Bases

CTS 4.6.2.1.d requires the drywell-to-suppression chamber bypass leakage test to be performed at an accelerated frequency (every 9 months versus the normal 18 months) if two consecutive tests fail to meet the specified limits. This accelerated testing requirement has not been included in ITS SR 3.6.1.1.3. According to DOC L.3, ITS SR 3.6.1.1.3 is based on NUREG-1434 STS SR 3.6.5.1.1. The staff believes this is the wrong SR to use, the more appropriate SR is STS SR 3.6.1.1.2 in NUREG-1433, since the design more closely resembles the BWR/4 design. NUREG-1433 STS SR 3.6.1.1.2 specifies this accelerated testing frequency. Based on the justification provided (DOCs L.2 and L.4), the staff finds that this change could be a beyond scope of review item for

this conversion; however, the justification is also generic in nature and thus the change would be considered as a generic change. Since the base frequency of 18 months is being changed to 24 months by DOC LD.1 and JFD 3 (See Comment Numbers 3.6.0-1 and 3.6.1.1-2), the staff will accept an accelerated test frequency of once every 12 months. Also see Comment Number 3.6.1.1-4 for additional concerns with regards to the accelerated testing. **Comment:** Delete this generic change and modify the CTS/ITS markup as discussed above. See Comment Number 3.6.1.1-4.

ComEd Response:

This issue has been identified as a beyond scope change in our submittal and is being processed by the NRC Project Manager.

3.6.1.3-4 DOC L.2
 DOC L.4
 JFD 3
 Bases JFD 3
 CTS 4.6.2.1.d
 ITS SR 3.6.1.1.3 and Associated Bases

CTS 4.6.2.1.d requires the drywell-to-suppression chamber bypass leakage test to be performed at an accelerated frequency (every 9 months versus the normal 18 months) if two consecutive tests fail to meet the specified limits. See Comment Numbers 3.6.0-1, 3.6.1.1-2, and 3.6.1.1-3 for concerns with regards to the frequency changes. This accelerated testing involves two tests, one at 1.5 psi and one at 5psi. Both of these accelerated tests are deleted from the ITS. Insufficient information is provided for the deletion of the tests. In addition, the staff considers the change to be a beyond scope of review item for this conversion. **Comment:** Delete this change.

ComEd Response:

This issue has been identified as a beyond scope change in our submittal and is being processed by the NRC Project Manager.

3.6.1.1-5 JFD 1
 Bases JFD 1
 Bases JFD 2
 Bases JFD 3
 Bases JFD 4
 CTS 4.6.1.1.b
 STS SR 3.6.1.1.1
 ITS SR 3.6.1.1.1 and Associated Bases

CTS 4.6.1.1.b requires leak rate testing in accordance with the Primary Containment Leakage Rate Testing Program which is based on the requirements of 10 CFR 50 Appendix J, Option B. STS SR 3.6.1.1.1 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 3.6.1.1.1 modifies STS SR 3.6.1.1.1 to conform to CTS 4.6.1.1.b 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 Rev 3. While the changes to ITS 3.6.1.1, 3.6.1.2, and 3.6.1.3 are in conformance with the above documents, the changes to the Bases associated with ITS 3.6.1.1, are not in conformance with the letter and TSTF-52 Rev.3. **Comment:** Licensee should revise its submittal to conform to the 11/2/95 letter and TSTF-52 Rev.3.

ComEd Response:

The ITS Bases will be revised to conform to TSTF-52, Rev. 3, as modified by plant-specific design and licensing basis differences as applicable.

3.6.1.1-6 Bases JFD 1
 CTS 4.6.1.1.e
 ITS B3.6.1.1 Bases - SR 3.6.1.1.2

ITS B3.6.1.1 Bases - SR 3.6.1.1.2 modifies the STS words by adding the following to the last sentence: ", except that Unit 1 and 2 primary containments shall be treated as twin containments even though the Initial Structural Integrity tests were not within two years of each other." This statement cannot be found in the CTS and its purpose is unknown, since the justification associated with the change (Bases JFD 1) is a general type of justification. In addition, this may be a beyond scope of review item for this conversion. **Comment:** Provide additional discussion and justification for this change based on current licensing basis, operating experience or system design.

ComEd Response:

The statement, " except that Unit 1 and 2 primary containments shall be treated as twin containments even though the Initial Structural Integrity tests were not within two years of each other," is from CTS 6.2.F.6, "Inservice Inspection Program for Post Tensioning Tendons." The statement is included in the ITS Bases for SR 3.6.1.1.2 for completeness and consistency with the LaSalle 1 and 2 current licensing basis reflected in the CTS.

3.6.1.2 Primary Containment Air Lock

3.6.1.2-1 DOC L.3
 CTS 3.6.1.3 ACTIONS a.1 and b
 ITS 3.6.1.2 Required Actions A.1 and C.2

CTS 3.6.1.3 ACTIONS a.1 and b require that with an airlock door or airlock inoperable that at least one airlock door be maintained closed. The CTS markup indicates through DOC L.3 that the word "maintain" is changed to "verify" and one hour is allowed to complete this verification. The change is characterized as a Less Restrictive(L) change. The justification (DOC L.3) does not provide sufficient information to conclude that the

change is a Less Restrictive (L) change. However, because no time limit is specified in the CTS other than the "within 24 hours" to lock the OPERABLE airlock door closed or restore the inoperable airlock to OPERABLE status, the staff concludes that the change is a More Restrictive change. Comment: Revise the CTS markup and provide a discussion and justification for this More Restrictive change.

ComEd Response:

CTS 3.6.1.3 Actions a.1 and b require that with one air lock door or the air lock inoperable, the other OPERABLE air lock door or one air lock door, as applicable, be maintained closed. Maintaining the other OPERABLE air lock door closed or one air lock door closed, as applicable, is an immediate action since no time is provided in the Actions. If the other air lock door is not OPERABLE and closed or one air lock door is not closed, Action a.3 or the second part of Action b, as applicable, must be taken, which require a shutdown. ITS 3.6.1.2 ACTIONS A and C allow 1 hour to ensure the other OPERABLE air lock door is closed or one air lock door is closed, as applicable, when one air lock door is inoperable or the air lock is inoperable. In addition, DOC L.3 was modified, prior to submittal, to clarify that the CTS word "maintain" is an immediate action consistent with the NRC approved DOC at Nine Mile Point Unit 2.

**3.6.1.2-2 DOC L.5
 CTS 3.6.1.3 ACTION b**

CTS 3.6.1.3 ACTION b has been modified to address an inoperable interlock mechanism. This change is characterized as a Less Restrictive (L) change (DOC L.5). While the change is acceptable, DOC L.5 is incorrect. DOC L.5 states the following: "Provided one inoperable air lock door in the air lock can be maintained closed,... This closed OPERABLE door is also required to be locked to assure it remains closed." These two sentences contradict each other. Comment: Correct this discrepancy.

ComEd Response:

The discrepancy will be corrected. The phrase in DOC L.5, "Provided one inoperable air lock door in the air lock can be maintained closed..." will be revised to " Provided one OPERABLE air lock door in the air lock can be maintained closed..."

**3.6.1.2-3 Bases JFD 7
 CTS 4.7.C.2
 STS SR 3.6.1.2.3 and Associated Bases
 ITS SR 3.6.1.2.2 and Associated Bases**

STS SR 3.6.1.2.3 requires verifying only one door in the airlock will open at a time at six month intervals. The interval is modified in ITS SR 3.6.1.2.2 from 6 months to 24 months. This modification is in accordance with TSTF-17; however, the Bases changes are not in accordance with TSTF-17. In particular, the deletion of the sentence which justifies the

frequency based on generic operating experience rather than plant specific experience. Comment: Revise the ITS Bases to be in accordance with TSTF-17 or justify the deviations.

ComEd Response:

We made two editorial changes concerning the TSTF-17, Rev. 1, Bases change, consistent with the most recent BWR ITS submittal. The first change was to TSTF-17, Rev. 1, Insert B. Insert B stated that "The 24 month Frequency for the interlock is justified based on generic operating experience." This type of statement is not worded this way anywhere else in the ISTS Bases. The words were changed in the LaSalle 1 and 2 ITS Bases to "Operating experience has shown these components usually pass the Surveillance when performed at the 24 month Frequency." The proposed words are consistent with numerous statements in the ISTS Bases. This change is justified in JFD 7. The wording of JFD 7 for this change was previously accepted by the NRC during the review of the Nine Mile Point Unit 2 ITS submittal. The second change was to correct a typographical error in TSTF-17, Rev. 1, Insert C. Insert C used the word "airlock" instead of "air lock." This change is justified in JFD 4. In addition, plant-specific operating experience has shown this frequency to be acceptable based on failure history. For these reasons, a revision to the ITS submittal is not required.

3.6.1.3 Primary Containment Isolation Valves (PCIVs)

- 3.6.1.3-1 DOC A.2
- CTS 3.6.1.1 ACTIONS
- CTS 3.6.3 ACTIONS
- ITS 3.6.1.3 ACTIONS Note 2

CTS 3.6.3 ACTIONS are modified by the addition of ITS 3.6.1.3 ACTIONS Note 2. This change is characterized as an Administrative change (DOC A.2). While this change is acceptable for CTS 3.6.3, it still needs to be addressed for the changes imposed on CTS 3.6.1.1 as a result of Comment Number 3.6.1.3-14. For that change, the addition of ITS 3.6.1.3 ACTIONS Note 2 becomes a Less Restrictive (L) change, because nothing in that ACTION statement of 3.6.1.1 implies separate condition entry. Comment: Revise the CTS markup and provide the appropriate discussions and justifications for this Less Restrictive (L) change. See Comment Number 3.6.1.3-14.

ComEd Response:

If a valve is opened that is not allowed to be opened, the Actions of CTS 3.6.3 are entered, not the Actions of CTS 3.6.1.1. CTS LCO 3.6.1.1 requires PRIMARY CONTAINMENT INTEGRITY to be maintained. The CTS definition of PRIMARY CONTAINMENT INTEGRITY states, in part, that PRIMARY CONTAINMENT INTEGRITY exists when "All primary containment penetrations required to be closed under accident conditions are ... Closed by at least one manual valve, blind flange, or de-activated automatic valve secured in its closed position, except for valves that are open under administrative control as permitted by Specification 3.6.3." Thus, when one of two manual valves in the penetration is open, PRIMARY CONTAINMENT

INTEGRITY is still met, since one valve is still closed and the Actions of CTS 3.6.1.1 do not have to be entered. With one of two valves open when not allowed by CTS 3.6.3 footnotes * or **, this valve would be declared inoperable and the Actions of CTS 3.6.3 entered. Therefore, CTS 3.6.3 does apply to devices addressed in CTS 4.6.1.1.a. Separate Condition entry for each penetration flow path is allowed in CTS 3.6.3, therefore, DOC A.2 is sufficient to address the devices in CTS 4.6.1.1.a and no additional justification is necessary. This is consistent with the ComEd interpretation of the requirement.

**3.6.1.3-2 DOC A.3
 CTS 3.6.1.8 ACTIONS
 CTS 3.6.3 ACTIONS
 ITS 3.6.3 ACTIONS Note 4**

CTS 3.6.3 ACTIONS are modified by the addition of ITS 3.6.1.3 ACTIONS Note 4. This change is characterized as an Administrative change (DOC A.3). While this change is acceptable for CTS 3.6.3, it still needs to be addressed for CTS 3.6.1.8, since the 10 CFR 50 Appendix J Type B and C leakage requirements apply to the drywell and suppression chamber purge and exhaust valves. The change would still be considered as an Administrative change. Comment: Revise the CTS markup and provide additional discussion and justification for this Administrative change.

ComEd Response:

ITS 3.6.1.3 ACTIONS Note 4 applies to ITS 3.6.1.3 ACTION D and does not apply to drywell and suppression chamber purge and exhaust valves since CTS 3.6.1.8 and ITS 3.6.1.3 do not include leakage limits for these valves.

**3.6.1.3-3 DOC A.4
 CTS 3.4.7 ACTION 1
 CTS 3.6.3 ACTION a.
 ITS 3.6.1.3 ACTIONS A and C**

CTS 3.4.7 ACTION 1 and 3.6.3 ACTION a. requires that with one or more PCIV/MSIV inoperable, one maintains at least one valve OPERABLE in each affected penetration that is open. The CTS markup deletes this requirement (maintain OPERABLE valve). This change is characterized as an Administrative change (DOC A.4). DOC A.4 states that CTS 3.4.7 ACTION 1 and CTS 3.6.3 ACTION a. do not specify whether a penetration has one or two valves, and that ITS 3.6.1.3 ACTION A applies if the affected penetration has two or more valves and only one is inoperable. DOC A.4 also states that "This inherently ensures maintaining' at least one isolation valve OPERABLE'." These statements are correct for the changes associated with converting CTS 3.4.7 ACTION 1 and CTS 3.6.3 ACTION a to ITS 3.6.1.3 ACTION A and thus acceptable. However, DOC A.4 also states that for penetrations with only one isolation valve the system boundary is considered as an adequate barrier and thus the penetration is not considered open. This is not entirely correct. One could argue that this is true for penetrations with one PCIV and a closed system as well as penetrations with two PCIVs and a closed system. However, ITS

3.6.1.3 ACTION C also applies to penetrations with one PCIV on a non-closed system and EFCVs. In this case, and possibly for the one valve closed system case, with an inoperable valve CTS 3.6.3 ACTION a requires an immediate shutdown because one cannot maintain at least one OPERABLE valve in the penetration. ITS 3.6.1.3 ACTION C would allow either 4 or 72 hours, depending on the system design or type of valve to isolate the penetration before requiring a shutdown (i.e., using a modification of CTS 3.6.3 ACTION a.1.a, a.1.b, or a.1.c.). Thus the change is a Less Restrictive (L) change with regards to ITS 3.6.1.3 ACTION C. **Comment:** Revise the CTS markup and provide the appropriate discussions and justifications for this Less Restrictive (L) change.

ComEd Response:

For the comment regarding a penetration with only one primary containment isolation valve and a closed system, ITS 3.6.1.3 DOC A.4 adequately addresses the proposed ACTION and has been previously accepted by the NRC during the review of the Nine Mile Point Unit 2 ITS conversion.

For the comment regarding penetrations with only one primary containment isolation valve on a non-closed system or Excess Flow Check Valves (EFCVs), ITS 3.6.1.3 DOCs L.1 and L.9 adequately address the proposed ACTION and have been previously accepted by the NRC during the review of the Nine Mile Point Unit 2 ITS conversion.

3.6.1.3-4 DOC LD.1
 JFD 6
 JFD 9
 Bases JFD 2
 Bases JFD 7
 CTS 4.6.3.2, 4.6.3.4, and 4.6.3.5.a
 ITS SR 3.6.1.3.7, SR 3.6.1.3.8, SR 3.6.1.3.9 and Associated Bases

See Comment Number 3.6.0-1. **Comment:** See Comment Number 3.6.0-1.

ComEd Response: None

3.6.1.3-5 DOC L.3
 CTS 3.0.3
 CTS 3.6.1.1 ACTIONS
 CTS 3.6.1.8 ACTIONS
 ITS 3.6.1.3 ACTIONS B and E

CTS 3.6.1.8 ACTIONS specifies the remedial actions to be taken if one purge or one exhaust valve per penetration is inoperable. If two purge or exhaust valves in a penetration become inoperable, the appropriate actions are CTS 3.0.3 or CTS 3.6.1.1 ACTIONS. In the ITS, the corresponding actions are ITS 3.6.1.3 ACTIONS B and E, which are the equivalent to CTS 3.0.3 or CTS 3.6.1.1. This Administrative change (addition of ITS 3.6.1.3 ACTION B) is not shown in the CTS markup of CTS 3.6.1.8.

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

ComEd Response:

The CTS 3.6.1.8 ACTION states, "With any drywell or suppression chamber purge or exhaust butterfly isolation valve open..." This means one or both valves open in a penetration. Therefore, no changes are necessary to the DOCs. However, the CTS 3.6.1.8 markup for ITS 3.6.1.3, on pages 5 of 10 and 10 of 10, will be revised to show the correct annotation for the ITS 3.6.1.3 ACTIONS.

3.6.1.3-6 DOC L.7
 CTS 4.6.3.2
 ITS SR 3.6.1.3.7 and Associated Bases

CTS 4.6.3.2 requires an automatic valve test at least once per 18 months during COLD SHUTDOWN or REFUELING. ITS SR 3.6.1.3.7 requires the same test on a frequency of 24 months. See Comment Numbers 3.6.0-1 and 3.6.1-3-4. The CTS markup shows that the test frequency detail of "during COLD SHUTDOWN or REFUELING" as being relocated to a licensee-controlled document that is not under regulatory program controls.

The justification is incorrect. The details on when the test is to be performed are found in the Bases for ITS SR 3.6.1.3.7. The description in the Bases would require the test be performed during cold shutdown or refueling, that the change is a Less Restrictive (LA) change rather than a Less Restrictive (L) change. **Comment:**

Revise the CTS markup and DOC L.7 to show that this information is relocated to ITS B3.6.1.3 Bases - SR 3.6.1.3.7 and that the change is a Less Restrictive (LA) change.

ComEd Response:

The description in the Bases states "The 24 month Frequency is based on the need to perform this Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power." The term "plant outage" is not equivalent to "COLD SHUTDOWN or REFUELING." The two defined terms equate specifically to MODES 4 and 5; i.e., for MODE 4, reactor mode switch in shutdown, reactor coolant temperature less than or equal to 200 degrees F, and fuel in the vessel with all reactor head closure bolts fully tensioned, and for MODE 5, reactor mode switch in shutdown or refueling and fuel in the reactor vessel with one or more reactor vessel head closure bolts less than fully tensioned. The term "plant outage" applies to any time the reactor is shutdown; i.e., MODE 3, 4, or 5, or the reactor defueled.

Therefore, this CTS requirement is not being proposed to be relocated to the Bases.

In addition, Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24 Month Fuel Cycle," did not require these special restrictions to be relocated to the Bases when they are removed from the Technical Specifications. Therefore, this change should remain a less restrictive change.

3.6.1.3-7 DOC L.9
 JFD 6

Bases JFD 7
CTS 4.6.3.4
NUREG-1433 STS SR 3.6.1.3.10 and Associated Bases
ITS SR 3.6.1.3.8 and Associated Bases

CTS 4.6.3.4 verifies that each EFCV is OPERABLE "by verifying that the valve checks flow." The CTS is modified by DOC L.9 to add the acceptance criteria that the EFCV actuates to the isolation position on an actual or simulated instrument line break. The corresponding ITS SR is ITS SR 3.6.1.3.8. The modified CTS 4.6.3.4 and ITS SR 3.6.1.3.8 is based on NUREG-1433 STS SR 3.6.1.3.10 and differs from STS SR 3.6.1.3.10 in two places. The STS words "to restrict flow to less than 1 gph" is replaced with "to the isolation position" and the ITS adds the words "an actual or". While concerns with the former change are addressed in Comment Number 3.6.1.3-8, the later change is not acceptable. The addition of the words "an actual or" is applicable to other BWR-4 and BWR-6 plants and the technical implications of the change are unknown. Thus the change is considered as a generic change which would be a beyond scope of review item for this review. **Comment:** Delete this generic change. See Comment Number 3.6.1.3-8.

ComEd Response:

This issue has been identified as a beyond scope change in our submittal and is being processed by the NRC Project Manager. In addition, this change has been previously approved by the NRC during the review of the Nine Mile Point Unit 2 ITS submittal.

3.6.1.3-8 DOC L.9
 JFD 6
 Bases JFD 7
 CTS 4.6.3.4
 NUREG-1433 STS SR 3.6.1.3.10 and Associated Bases
 ITS SR 3.6.1.3.8 and Associated Bases

CTS 4.6.3.4 verifies that each EFCV is OPERABLE by "verifying that the valve checks flow." The corresponding ITS SR 3.6.1.3.8 verifies that each EFCV actuates to its isolation position. The "checks flow" in CTS 4.6.3.4 implies that the flow is stopped with no leakage. The "actuates to its isolation position" in ITS SR 3.6.1.3.8 only verifies that the EFCV closes, it does not imply that there is no leakage. A closed valve can leak. The justification provided for this Less Restrictive change (DOC L.9) does not provide sufficient information to evaluate this change, and based on the information provided, it can be considered as a change in the current licensing basis. Thus it would be considered as a beyond scope of review item for this conversion. It should be noted that the corresponding STS SR in NUREG-1433 STS SR 3.6.1.3.10 does allow some leakage. If the intent of the STS/ITS SR was just to verify that the valve actuates to the isolation position then STS SR 3.6.1.3.8/ITS SR 3.6.1.3.7 would be sufficient. However, this SR verifies the EFCV leakage rate (i.e., no leakage or some leakage) upon actuation. Therefore the proposed change and the Bases details on how to verify compliance with the SR are unacceptable. See Comment Number 3.6.1.3-10 for concerns with regards to the ACTIONS to be taken upon failure of this SR. **Comment:** Delete this change. See Comment Numbers 3.6.1.3.7 and 3.6.1.3.10.

ComEd Response:

We do not agree that the term "checks flow" implies that there is no leakage. "Checks flow" simply means that when the valve closes, flow through the valve decreases. The design of the excess flow check valves (EFCVs) is not to have zero leakage when closed; it is only designed to decrease most of the flow through the valve. As described in DOC L.9, the requirements for the EFCVs are provided in 10 CFR 50 Appendix A, General Design Criteria (GDC) 55 and 56, and guidance is provided in Regulatory Guide 1.11, "Instrument Lines Penetrating Primary Containment." These requirements and guidance state that there should be a high degree of assurance that the EFCVs will close or be closed if the instrument line outside containment is lost during normal reactor operation, or under accident condition. The proposed SR ensures this requirement, since it requires the EFCV to isolate to the isolation position (i.e., closed) on an instrument line break signal. The CTS requirement does not specifically require the valve to close fully, just to "check flow." Thus, the proposed ITS SR 3.6.1.3.8 ensures the Regulatory Guide 1.11 guidance is met. In addition, DOC L.9 further states that the Updated Final Safety Analysis Report (UFSAR) analysis of an instrument line break does not even assume the valve goes closed; a specific EFCV leakage limit is not an assumption in the analysis. In addition, this change, using a similar DOC, was approved by the NRC during the review of the Nine Mile Point Unit 2 ITS submittal. Therefore, sufficient information is provided in DOC L.9 to justify the change. Additionally, this issue was identified as a beyond scope change in our submittal and is being handled by the NRC Project Manager.

3.6.1.3-9 DOC L.11
 Bases JFD 7
 CTS 4.6.1.1.a and Associated **Footnote
 ITS SR 3.6.1.3.2, SR 3.6.1.3.3 and Associated Bases

CTS 4.6.1.1.a, its associated **Footnote, ITS SR 3.6.1.3.2 and ITS SR 3.6.1.3.3 have been modified to exclude those valves which are locked, sealed or otherwise secured from the closure verification. This change implements TSTF-45. While the change to the ITS SRs is in accordance with the TSTF, the Bases changes are not in accordance with TSTF-45 Rev.2. Comment: Licensee should revise its submittal to conform to TSTF-45 Rev.2.

ComEd Response:

The LaSalle 1 and 2 Bases for ITS SRs 3.6.1.3.2 and 3.6.1.3.3 will be revised to conform the TSTF-45, Rev. 2, as reflected in the Dresden 2 and 3 Bases for ITS SRs 3.6.1.3.2 and 3.6.1.3.3.

3.6.1.3-10 DOC L.13
 JFD 4
 JFD 8
 Bases JFD 16
 CTS 3.6.3 ACTIONS
 STS 3.6.1.3 ACTIONS A, B, C, D and Associated Bases
 ITS 3.6.1.3 ACTIONS A, B, C, D and Associated Bases

STS 3.6.1.3 ACTIONS A, B, C, D and their associated Bases have been modified by TSTF-207 Rev.4 to provide the appropriate ACTIONS for specific PCIV leakage. CTS 3.6.3 ACTIONS and ITS 3.6.1.3 ACTIONS A, B, C, D and their associated Bases have been modified to only address MSIV and hydrostatically tested line leakage. If these were the only leakages of concern, then the change and deviation from TSTF-207 would be unacceptable. However, in light of Comment Number 3.6.1.3-8, ITS 3.6.1.3 ACTIONS A, B, C, D and their associated Bases also need to be revised in accordance with TSTF-207 Rev.4 to also address EFCV leakage. **Comment:** Licensee should revise its submittal (both CTS and ITS) to conform to TSTF-207 Rev.4 and to account for the actions to be taken for excessive EFCV leakage. Provide the appropriate discussions and justification for this change. See Comment Number 3.6.1.3-8.

ComEd Response:

As previously stated in the response to NRC Comment 3.6.1.3-8, the CTS do not specify a leakage limit and the UFSAR analysis of an instrument line break does not even assume the EFCV goes closed; a specific leakage limit is not an assumption in the analysis. Therefore, the only leakage of concern in ITS 3.6.1.3 is MSIV leakage and hydrostatically tested line leakage. Therefore, providing specific ACTIONS for excessive EFCV leakage is not appropriate.

The ITS submittal will be revised to be consistent with TSTF-207, Rev. 5, except where plant-specific differences apply or where typographical/consistency errors are noted.

3.6.1.3-11 JFD 2
 Bases JFD 8
 STS SR 3.6.1.3.10 and Associated Bases
 ITS SR 3.6.1.3.10 and Associated Bases

STS B3.6.1.3 Bases-SR 3.6.1.3.10 describes Note 1 that is added to STS SR 3.6.1.3.10 . STS SR 3.6.1.3.10 does not contain such a Note, however, BWR 16 justification C.5, approved by the staff, added this Note to STS SR 3.6.1.3.10. It was inadvertently omitted in Revision 1 to the NUREGs. TSB 13 has been generated to correct this problem. ITS B3.6.1.3 Bases SR 3.6.1.3.10 deletes this Note description based on Bases JFD 8. This is incorrect. Bases JFD 8 has nothing to do with this Note. A justification similar to JFD 2 would be a more appropriate justification for deleting the Note description. **Comment:** Provide additional discussion and justification for the deletion of this Note description.

ComEd Response:

The Applicability of ITS 3.6.1.3 is "MODES 1, 2, and 3," and "When associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, Primary Containment Isolation Instrumentation." ISTS SR 3.6.1.3.10 applies only to main steam isolation valves. Main steam isolation valves have no associated instrumentation requirements in MODES or conditions other than MODES 1, 2 and 3. Therefore, the Applicability of the ITS 3.6.1.3 for main steam isolation valves is MODES 1, 2, and 3. In accordance with SR 3.0.1, "SRs shall be met during the MODES or other specified conditions in the Applicability for individual LCOs, unless otherwise stated in the SR. Therefore, the proposed change is unnecessary and inconsistent with the format and presentation of SRs in the rest of the ISTS. It should be noted that JFD 2, not JFD 8, should be the proper annotation for this deviation.

3.6.1.3-12 Bases JFD 7
STS B3.6.1.3 Bases - SR 3.6.1.3.2
ITS B3.6.1.3 Bases - SR 3.6.1.3.1

STS B3.6.1.3 Bases - SR 3.6.1.3.2 states the following: "If a purge valve is open...inoperable. If the inoperable valve...limits." ITS B3.6.1.3 Bases - SR 3.6.1.3.1 deletes these sentences. The justification used (Bases JFD 7) states the deletion reflects changes made to the specification. No such changes have been made to the specification which would allow the deletion of the first sentence. In addition, the sentence is valid for LaSalle. Comment: Delete this change.

ComEd Response:

The statements are not needed in the Bases and could lead to misinterpretation of similar Surveillance Requirements. The Bases words that were deleted essentially state that if a purge valve is open when it is not allowed to be open, then the purge valve is inoperable. However, just because the purge valve is open does not mean the purge valve's leakage must be also considered not within the limit. It should also be noted that the LaSalle 1 and 2 current licensing basis, reflected in the CTS, does not include individual leakage limits for purge valves. These words are true for other automatic PCIVs that have individual leakage limits and are inoperable due to being unable to close within the assumed time. For example, ISTS SR 3.6.1.3.7 requires the full closure time of the MSIVs to be verified within limits. However, when the time cannot be met (e.g., as in the case when the MSIV will not close), the MSIV leakage limit is not assumed to be not met; only the MSIV is considered inoperable. The Bases for ISTS SR 3.6.1.3.7 does not have similar statements in it concerning this issue, even though it is identical to the purge valve case. Therefore, since the statements are not needed in ITS SR 3.6.1.3.1 Bases, and similar words did not appear in all the places to which it is applicable, the statements were deleted.

**3.6.1.3-13 Bases JFD 11
Bases JFD 16
STS 3.6.1.3 ACTION C and Associated Bases
ITS 3.6.1.3 ACTION C and Associated Bases**

ITS 3.6.1.3 ACTION C and its associated Bases modifies STS 3.6.1.3 ACTION C and its associated Bases to incorporate TSTF-30. While the changes to ITS 3.6.1.3 ACTION C are in accordance with the TSTF, the Bases changes are not in accordance with TSTF-30, Rev.3. Comment: Licensee should revise its submittal to conform to TSTF-30, Rev.3.

ComEd Response:

We will revise the submittal to be consistent with TSTF-30, Rev. 3, except where plant specific differences apply or where typographical/consistency errors are noted.

**3.6.1.3-14 CTS 3.6.1.1 ACTIONS
CTS 4.6.1.1.a
ITS 3.6.1.3 ACTIONS
ITS SR 3.6.1.3.2, SR 3.6.1.3.3 and Associated Bases**

CTS 4.6.1.1.a verifies that all penetrations not capable of being closed by OPERABLE automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions. The corresponding ITS SRs for this CTS surveillance are ITS SR 3.6.1.3.2 for valves outside containment and ITS SR 3.6.1.3.3 for valves inside containment. If CTS 4.6.1.1.a cannot be met, the ACTIONS of CTS 3.6.1.1 are entered which require restoration of valve OPERABILITY within 1 hour or shutdown within the following 36 hours. If ITS SR 3.6.1.3.2 or ITS SR 3.6.1.3.3 cannot be met, the ACTIONS of ITS 3.6.1.3 are entered which allows for one valve inoperable between 4 hours and 72 hours depending on the type of penetration to restore valve OPERABILITY before shutdown commences. This Less Restrictive (L) change to the CTS is not justified. Comment: Revise the CTS markup to show this Less Restrictive change and provide the appropriate discussions and justifications.

ComEd Response:

If a valve is open that is not allowed to be open, the Actions of CTS 3.6.3 are entered, not the Actions of CTS 3.6.1.1. CTS LCO 3.6.1.1 requires PRIMARY CONTAINMENT INTEGRITY to be maintained. The CTS definition of PRIMARY CONTAINMENT INTEGRITY, states, in part, that PRIMARY CONTAINMENT INTEGRITY exists when "All primary containment penetrations required to be closed during accident conditions are ... Closed by at least one manual valve, blind flange, or de-activated automatic valve secured in its closed position, except for valves that are open under administrative control as permitted by Specification 3.6.3." Thus, when one of the two manual valves in the penetration is open, PRIMARY

CONTAINMENT INTEGRITY is still met, since one valve is still closed, and the Actions of CTS 3.6.1.1 do not have to be entered. With one of the two valves open when not allowed by CTS 3.6.3 footnotes * and **, this valve would be declared inoperable and the Actions of CTS 3.6.3 would be entered. CTS 3.6.3 allows 4 hours to isolate the affected penetration. ISTS 3.6.1.3 ACTIONS are consistent with this 4 hour allowance, except where justified. The change to 72 hours for some valves is justified in DOC L.1. Therefore, since the current time in the CTS to isolate a valve is consistent with the proposed time in the ITS to isolate a valve, except where previously justified in DOC L.1, no additional justification is necessary. This is consistent with the ComEd interpretation of the requirement.

3.6.1.4 Drywell and Suppression Chamber Pressure

**3.6.1.4-1 DOC M.1
 JFD 2
 Bases JFD 3
 Bases JFD 4
 CTS 3.6.1.6
 ITS LCO 3.6.1.4 and Associated Bases**

CTS 3.6.1.6 specifies that the drywell and suppression chamber internal pressure be maintained between -0.5 and 2.0 psig. The CTS and ITS markups show that the upper pressure has been revised from 2.0 to 0.75 psig. The justification (DOC M.1) states that the initial conditions employed for analyzing containment response described in the UFSAR assumes a pressure of less than or equal to 0.75 psig. Even though the change is a More Restrictive change, no indication is given in DOC M.1 that this new pressure limit has been reviewed and approved by the staff or why the current limit is unacceptable. Thus, the staff considers this change to be a beyond scope of review item for this conversion. Comment: Delete this change.

ComEd Response:

This issue has been identified as a beyond scope change in our submittal and is being processed by the NRC Project Manager.

3.6.1.6 Suppression Chamber-to-Drywell Vacuum Breakers

**3.6.1.6-1 LD.1
 JFD 2
 Bases JFD 2
 CTS 4.6.4.1.b.2
 ITS SR 3.6.1.6.3 and Associated Bases**

See Comment Number 3.6.0-1. Comment: See Comment Number 3.6.0-1.

ComEd Response: None

3.6.1.6-2 DOC L.1
 JFD 6
 Bases JFD 5
 CTS 4.6.4.1.b.1
 STS SR 3.6.1.8.2 (NUREG-1433)
 ITS SR 3.6.1.6.2 and Associated Bases

CTS 4.6.4.1.b.1 and NUREG-1433 STS SR 3.6.1.8.2 specify that a functional test of each suppression chamber-to-drywell vacuum breaker be performed on a 31 day frequency. The corresponding ITS SR is ITS SR 3.6.1.6.2 is based on NUREG-1433 STS SR 3.6.1.8.2. However, ITS SR 3.6.1.6.2 modifies the CTS/STS surveillance frequency from 31 days to 92 days. The basis for this frequency change (DOC L.1 and JFD 6) is that these vacuum breakers are located in secondary containment which is not a harsh environment. While this may be true for the valve's external parts, the internal parts are still located in a harsh environment. In addition, there is insufficient information to make a determination as to the acceptability of the change. Thus, the staff considers this change to be a beyond scope of review item for this conversion. Furthermore, since this change could apply to other BWRs, it is also considered to be generic. **Comment: Delete this generic change.**

ComEd Response:

This issue has been identified as a beyond scope change in our submittal and is being processed by the NRC Project Manager.

3.6.1.6-3 Bases JFD 6
 STS B3.6.1.8 Bases - APPLICABILITY
 ITS B3.6.1.6 Bases - APPLICABILITY

STS B 3.6.1.8 Bases - APPLICABILITY justifies the OPERABILITY of the suppression chamber-to-drywell vacuum breakers in MODES 1, 2, and 3. Two conditions related to excessive negative pressure necessitate this MODE applicability, an inadvertent actuation of the Suppression Pool Spray System and depressurization of the drywell. ITS B3.6.1.6 Bases APPLICABILITY states that depressurization of the drywell could occur due to inadvertent actuation of the Drywell Spray System. All mention of inadvertent actuation of the Suppression Pool Spray System has been deleted. Bases JFD 6 states that inadvertent actuation of the Suppression Pool Spray System is not the main concern. The justification does not adequately address this deletion since it implies that it is a concern in drywell depressurization, just not the main concern. In addition, the change could be considered a potential generic change. **Comment: Provide additional justification and discussion for this deletion based on current licensing bases, system design or operation constraints.**

ComEd Response:

Bases JFD 6 states that suppression pool spray cannot cause excessive negative pressure; drywell spray is the system that can cause this event. In addition, this JFD has been reviewed and approved by the NRC in the Nine Mile Point Unit 2 ITS submittal.

3.6.2.1 Suppression Pool Average Temperature

- 3.6.2.1-1** Bases JFD 5
STS B3.6.2.1 Bases - D.1 and D.2
ITS B3.6.2.1 Bases - D.1, D.2 and D.3

STS B3.6.2.1 Bases - D.1 and D.2 uses the phrase "In this Condition..." ITS B3.6.2.1 Bases - D.1, D.2 and D.3 decapitalizes the "C" in "Condition" and justifies it as a typographical or editorial change. This is incorrect. The condition referred to in the sentence is Condition D and not the system operating or physical condition. Therefore, it should be "Condition" rather than "condition". **Comment: Correct this discrepancy.**

ComEd Response:

The condition referred to in the sentence is not Condition D, but the physical condition. This is essentially a typographical error in the ISTS, and it is being corrected so that it does not conflict with other similar descriptions in the Bases (e.g., ISTS Bases for 3.1.7, 3.4.9, 3.7.3, and 3.7.4). In addition, this change has been reviewed and approved by the NRC in the Nine Mile Point Unit 2 ITS submittal.

3.6.2.3 Residual Heat Removal (RHR) Suppression Pool Cooling

- 3.6.2.3-1** DOC A.2
CTS 3.6.2.3 ACTION b and Associated *Footnote
ITS 3.6.2.3 ACTION C

With both RHR suppression pool cooling subsystems inoperable, CTS 3.6.2.3 ACTION b requires unit to be in COLD SHUTDOWN (MODE 4) within 36 hours. The ACTION statement is modified by a footnote which states that "if unable to attain COLD SHUTDOWN as required by this ACTION, maintain reactor coolant temperature as low as practical by use of alternate heat removal methods." The footnote allows the plant to remain in HOT SHUTDOWN (MODE 3) indefinitely. The CTS markup shows this footnote as being deleted, and justifies the deletion as an Administrative change (DOC A.2). This is incorrect. ITS 3.6.2.3 ACTION C requires being in MODE 4 within 36 hours with no allowance to remain in MODE 3 beyond the 36 hours as allowed by the CTS. Remaining in MODE 3 beyond the 36 hours in the ITS would constitute a violation of TS which is not the case in the CTS. Thus the change is a More Restrictive change. This discussion is also applicable to similar changes made in the CTS markups for ITS 3.6.2.4. See Comment Number 3.6.2.4-1. **Comment: Revise the CTS markup and provide additional discussion and justification for this More Restrictive change. See Comment Number 3.6.2.4-1.**

ComEd Response:

While the CTS footnote appears to allow the unit to remain in MODE 3 for an unlimited amount of time, in reality it only allows the unit to remain in MODE 3 as long as MODE 4 cannot be attained. This is not an unlimited amount of time. Deletion of the footnote does not really take away an allowance that impacts operation of the unit; in the ITS, which does not include the footnote allowance, if

sufficient equipment is inoperable such that MODE 4 cannot be attained, then the unit will still be forced to stay in MODE 3. When MODE 4 is not reached in the required time, a violation of Technical Specifications occurs. However, this is not a purposeful or intentional Technical Specifications violation. Thus, the only difference between CTS compliance and ITS compliance is that without the footnote, a report to the NRC may be required by 10 CFR 50.73, "Licensee event report system." However, this report is not a Technical Specifications requirement, thus there is no change to the Technical Specifications. Therefore, this change should remain as an "Administrative" change.

3.6.2.3-2 DOC LA.1
 JFD 3
 Bases JFD 3
 CTS 3.6.2.3
 STS B3.6.2.3 Bases - LCO
 ITS B3.6.2.3 Bases - LCO

CTS 3.6.2.3 states that the suppression pool cooling mode of the RHR System shall be OPERABLE with two independent loops, each loop consisting of one OPERABLE RHR pump. The CTS markup shows that the description of what constitutes an OPERABLE system including the word "independent" is relocated by DOC LA.1 to the Bases. STS B3.6.2.3 Bases - LCO states "To ensure that these requirements are met, two RHR suppression pool cooling subsystems must be OPERABLE with power from two safety related independent power supplies." ITS B3.6.2.3 Bases - LCO deletes the words "with power from two...power supplies." The justification (Bases JFD 3) states that the design of the system reflects this, in that the two power supplies cannot be cross-connected. However, JFD 3 states that the RHR System consists of three pumps of which only two are used for the suppression pool cooling and spray modes of operation. Because only 2 of the 3 pumps are required, that means that the third pump is a standby or replacement pump if one of the other pumps become inoperable. Based on the discussions in JFD 3 and Bases JFD 3, it is unclear what each pump's power source is. If each pump is powered by an independent safety related power source (i.e., three independent power trains), then the deletion of the words is acceptable. However, if there are only two independent safety related power sources, then one of the pumps is either powered solely from one of the power sources or can be powered by either source. If this is the case, then the deleted words need to remain in order to assure subsystem independence with regards to system OPERABILITY. **Comment:** Provide additional discussion and justification on each pump's power source. Revise the ITS markup accordingly.

ComEd Response:

The design of the Residual Heat Removal (RHR) System at LaSalle 1 and 2 does include three pumps. However, only two of the three pumps are capable of providing flow through heat exchangers. The third pump provides flow directly to the reactor vessel. The Bases of ITS 3.6.2.3 states that an RHR suppression pool cooling subsystem consists of a pump and a heat exchanger. Therefore, by design, only two specific RHR pumps can be used to satisfy the requirements of LCO 3.6.2.3 and these two pumps are powered from independent power supplies.

3.6.2.3-3 Bases JFD 1
STS B3.6.2.3 Bases - SR 3.6.2.3.2
ITS B3.6.2.3 Bases - SR 3.6.2.3.2

STS B3.6.2.3 Bases - SR 3.6.2.3.2 states that the purpose of this surveillance is to ensure that "pump performance has not degraded during the cycle." ITS B3.6.2.3 Bases - SR 3.6.2.3.2 deletes these words and replaces them with "peak suppression pool temperature can be maintained below design limits during a DBA (Ref.1)". While the ITS words are applicable to total system OPERABILITY, they have little to do with pump OPERABILITY which is the purpose of the SR and they change the intent of the SR. In addition, the justification used for the deletion is a general justification that deals with plant specific nomenclature, system description, etc., which does not apply in this case. **Comment:** Delete this change.

ComEd Response:

The Bases to ITS SR 3.6.2.3.2 was revised to delete the phrase "pump performance has not degraded during the cycle," since the phrase is not necessarily true. The acceptance criteria for the Surveillance is ≥ 7200 gpm. As long as the pump can develop a flow rate ≥ 7200 gpm, the Surveillance Requirement will be met no matter how much degradation has occurred in pump performance. Therefore, it is inappropriate to delete this change. This change is also consistent with the change accepted by the NRC in the Nine Mile Point Unit 2 ITS submittal.

3.6.2.3-4 Bases JFD 6
STS B3.6.2.3 Bases - A.1
ITS B3.6.2.3 - A.1

See Comment Number 3.6.2.1-1. **Comment:** See Comment Number 3.6.2.1-1

ComEd Response:

See response to NRC Comment 3.6.2.1-1.

3.6.2.3-5 Bases JFD 7
STS B3.6.2.3 Bases - SR 3.6.2.3.2
ITS B3.6.2.3 Bases - SR 3.6.2.3.2

STS B3.6.2.3 Bases - SR 3.6.2.3.2 states the following: "Such inservice inspections confirm component OPERABILITY, trend performance, and detect incipient failures by indicating abnormal performance." ITS B3.6.2.3 Bases - SR 3.6.2.3.2 modifies this sentence by deleting the words "trend performance". The justification for this change (Bases JFD 7) states that the LaSalle IST program is not required to provide information for trend purposes. The STS Bases discussion does not require that performance be trended, however, it is assumed that specific data is recorded or taken during the pump

tests and that if needed, can be used to evaluate pump OPERABILITY over a period of time that is trending. The staff believes that the words do not constitute a requirement but provide information on SR use and should be retained. Comment: Delete this change.

ComEd Response:

The Bases to ITS SR 3.6.2.3.2 was revised to delete the phrase "trend performance," since the phrase is not true. The SR allows data to be collected so that performance can be trended. However, SR 3.6.2.3.2 does not require trending to be performed. In addition, the Bases for ISTS SR 3.6.2.3.2, as written, does include a requirement to trend performance which is not included in the Technical Specification Surveillance Requirement. It is inappropriate for the Bases to include requirements beyond those included in the Technical Specifications. Therefore, this change should not be deleted. In addition, this change has been reviewed and accepted by the NRC in the Nine Mile Point Unit 2 ITS submittal.

3.6.2.4 Residual Heat Removal (RHR) Suppression Pool Spray

3.6.2.4-1 DOC A.2
CTS 3.6.2.2 ACTION b and Associated *Footnote
ITS 3.6.2.4 ACTION c

See Comment Number 3.6.2.3-1. Comment: See Comment Number 3.6.2.3-1.

ComEd Response:

See response to NRC Comment 3.6.2.3-1.

3.6.2.4-2 DOC LA.1
JFD 5
Bases JFD 5
CTS 3.6.2.2
STS B3.6.2.4 Bases - LCO
ITS B3.6.2.4 Bases - LCO

See Comment Number 3.6.2.3-2. Comment: See Comment Number 3.6.2.3.2.

ComEd Response:

The design of the Residual Heat Removal (RHR) System at LaSalle 1 and 2 does include three pumps. However, only two of the three pumps are capable of providing flow through heat exchangers. The third pump provides flow directly to the reactor vessel. The Bases of ITS 3.6.2.4 states that an RHR suppression pool spray subsystem consists of a pump and a heat exchanger. Therefore, by design, only two specific RHR pumps can be used to satisfy the requirements of LCO 3.6.2.4 and these two pumps are powered from independent power supplies.

3.6.2.4-3 Bases JFD 2
 STS B3.6.2.4 Bases - B.1
 ITS B3.6.2.4 Bases - B.1

STS B3.6.2.4 Bases - B.1 states that one of the bases for the 8 hour Completion Time is that there are alternate methods to remove heat from the primary containment. ITS B3.6.2.4 Bases - B.1 modifies this bases to reflect the alternate methods to reduce pressure rather than remove heat. Since the purpose of the suppression pool spray as stated in STS/ITS B3.6.2.4 Bases - BACKGROUND is to remove heat not to reduce pressure from the primary containment, the basis for allowing the 8 hour Completion Time in STS/ITS B3.6.2.4 Bases - B.1 is the availability of these other methods of removing heat. **Comment: Delete this change.**

ComEd Response:

This change was previously accepted by the NRC in the Nine Mile Point Unit 2 ITS submittal. The Bases states that heat addition increases pressure. Therefore, the alternate methods must be capable of reducing pressure.

3.6.2.4-4 Bases JFD 2
 STS B3.6.2.4 Bases - SR 3.6.2.4.2
 ITS B3.6.2.4 Bases - SR 3.6.2.4.2

STS B3.6.2.3 Bases - SR 3.6.2.3.2 states that the purpose of this surveillance is to ensure that "pump performance has not degraded during the cycle." ITS B3.6.2.3 Bases - SR 3.6.2.4.2 deletes these words and replace them with "helps ensure that the primary containment pressure can be maintained below the design limits during a DBA (Ref.1)." While the ITS words are applicable to total system OPERABILITY, they have little to do with pump OPERABILITY which is the purpose of the SR and they change the intent of the SR. In addition, the justification used for the deletion is a general justification that deals with plant specific nomenclature, system description, etc., which does not apply in this case. **Comment: Delete this change.**

ComEd Response:

The Bases to ITS SR 3.6.2.4.2 was revised to delete the phrase "pump performance has not degraded during the cycle," since the phrase is not necessarily true. The acceptance criteria for the Surveillance is ≥ 450 gpm. As long as the pump can develop a flow rate ≥ 450 gpm, the Surveillance Requirement will be met no matter how much degradation has occurred in pump performance. Therefore, it is inappropriate to delete this change.

3.6.2.4-5 Bases JFD 6
 STS B3.6.2.4 Bases - A.1 and B.1
 ITS B3.6.2.4 Bases - A.1 and B.1

See Comment Number 3.6.2.1-1. Comment: See Comment Number 3.6.2.1-1.

ComEd Response:

See response to NRC Comment 3.6.2.1-1.

3.6.3.1 Primary Containment Hydrogen Recombiners

3.6.3.1-1 DOC LD.1
 JFD 3
 Bases JFD 2
 CTS 4.6.6.1.b and 4.6.6.1.c
 ITS SR 3.6.3.1.1, SR 3.6.3.1.2 and Associated Bases

See Comment Number 3.6.0-1. Comment: See Comment Number 3.6.0-1.

ComEd Response: None.

3.6.3.1-2 DOC L.2
 JFD 3
 Bases JFD 2
 Bases JFD 4
 CTS 3.6.6.1 ACTION
 STS 3.6.3.1 ACTION B and Associated Bases
 ITS 3.6.3.1 ACTION B and Associated Bases

CTS 3.6.6.1 ACTION only permits one hydrogen recombiner to be inoperable. If two hydrogen recombiners are inoperable CTS 3.0.3 is entered. CTS 3.6.6.1 ACTION has been modified to incorporate STS 3.6.3.1 ACTION B which allows two hydrogen recombiners to be inoperable for up to 7 days. The use of STS 3.6.3.1 ACTION B is allowed, as specified in a Bases Reviewer's Note, provided that the alternate hydrogen control system is found to be acceptable to the staff. DOC L.2 does not contain any evidence that the staff has approved an alternate hydrogen control system(s). There is no other LCO controlled hydrogen control system(s) in the ITS such as specified in the NUREGs. DOC L.2 refers to the Primary Containment Vent and Purge System" and there is in ITS B3.6.3.1 Bases B.1 and B.2 a reference to "the Primary Containment Vent and Purge System which is an LCO controlled system; however, there is no indication that this system has been approved by the staff for hydrogen control based on the discussions in ITS B3.6.1.3 Bases . Comment: Provide additional discussion and justification to show that the staff has found this alternate hydrogen control system acceptable.

ComEd Response:

The NRC acceptance of the use of the purge system as a backup to the hydrogen recombiners is documented in Section 6.2.5 of NUREG-0519, "Safety Evaluation Report related to the operation of the LaSalle County Station Unit Nos. 1 and 2," dated March 1981.

3.6.3.1-3 DOC L.3
 CTS 4.6.6.1.a

CTS 4.6.6.1.a specifies a stroke test of the flow control and recirculation valves at least once per 92 days. The CTS markup shows this test as being deleted by DOC L.3. DOC L.3 states that this test is covered by the IST Program. Since the test is covered by the IST Program which is controlled by a regulation, the change is not a deletion or relocation to a licensee controlled document which would be a Less Restriction (L) change, but Less Restrictive (LA) change relocation to a licensee regulation controlled document.
Comment: Revise the CTS markup and provide a discussion and justification for this Less Restrictive (LA) change.

ComEd Response:

The subject change will be re-categorized as a "Less Restrictive (LA)" change.

3.6.3.1-4 Bases JFD 3
 STS B3.6.3.1 Bases - A.1
 ITS B3.6.3.1 Bases - A.1

See Comment Number 3.6.2.1-1. **Comment:** See Comment Number 3.6.2.1-1.

ComEd Response:

See response to NRC Comment 3.6.2.1-1.

3.6.4.1 Secondary Containment

3.6.4.1-1 DOC LD.1
 JFD 1
 Bases JFD 4
 CTS 4.6.5.1.c
 ITS SR 3.6.4.1.3, SR 3.6.4.1.4 and Associated Bases

See Comment Number 3.6.0-1. **Comment:** See Comment Number 3.6.0-1.

ComEd Response: None

3.6.4.1-2 Bases JFD 3
 STS B3.6.4.1 Bases - C.1, C.2 and C.3
 ITS B3.6.4.1 Bases - C.1, C.2 and C.3

The third paragraph, last sentence in STS B3.6.4.1 Bases - C.1, C.2 and C.3 states the following: "Therefore, in either case, inability to suspend movement... a reactor shutdown." ITS B3.6.4.1 Bases - C.1, C.2 and C.3 deletes this sentence and replaces it with "insert C.1, C.2, and C.3." The insert does not seem to make sense, is confusing and the justification (Bases JFD 3) describes the change as a consistency change with

other specifications. The staff finds that this change is not consistent with other STS Bases and that the STS wording is correct. **Comment:** Delete this change.

ComEd Response:

These words, which describe the purpose and meaning of an ACTIONS Note, were modified to be consistent with a request by the NRC during the review and approval phase of a recent BWR/4 ITS submittal. We agreed with the change because the existing words were confusing. As a result, these words have been modified in the LaSalle 1 and 2 ITS Bases in all Bases locations that describe a similar Note. This change has been approved by the NRC in all other cases. Therefore, to maintain consistency with all other places where this type of Note is described, these words should be accepted. We have re-reviewed the words and find that they are not changing the intent of the Note (i.e., the modification is administrative) and that the words are not confusing.

3.6.4.1-3 CTS 3.6.5.2 ACTION b
ITS 3.6.4.1 ACTION C and Associated Bases

CTS 3.6.5.2 ACTION b specifies the remedial actions to be taken for an inoperable secondary containment when in OPERATIONAL CONDITION* (when handling irradiated fuel in secondary containment, during CORE ALTERATIONS and operations with a potential for draining the reactor vessel (OPDRVs)). These ACTIONS are modified by the statement that the provisions of CTS 3.0.3 are not applicable and it applies to all of OPERATIONAL CONDITION*. The corresponding ITS ACTION is ITS 3.6.4.1 ACTION C. ITS 3.6.4.1 ACTION C also has a Note specifying that the provision of ITS LCO 3.0.3 are not applicable, but this Note only applies to the movement of irradiated fuel assemblies and not to CORE ALTERATIONS and OPDRVs. No justification is provided for this More Restrictive change. **Comment:** Revise the CTS markup and provide the appropriate discussion and justification for this More Restrictive change.

ComEd Response:

This is not a "More Restrictive" change since it is not possible to perform CORE ALTERATIONS or Operations with the Potential for Draining the Reactor Vessel (OPDRVs) in MODE 1, 2, or 3. CTS 3.0.3 and ITS LCO 3.0.3 are only applicable in MODES 1, 2, and 3. Therefore, no change to the ITS submittal is necessary.

3.6.4.2 Secondary Containment Isolation Valves (SCIVs)

3.6.4.2-1 DOC A.2
CTS 3.6.5.1 ACTIONS
CTS 3.6.5.2 ACTIONS
ITS 3.6.4.2 ACTIONS Notes 2 and 3

CTS 3.6.5.2 ACTIONS are modified by the addition of ITS 3.6.4.2 ACTIONS Notes 2 and 3. This change is characterized as an Administrative change (DOC A.2). While this change is acceptable for CTS 3.6.5.2, it still needs to be addressed for the changes

imposed on CTS 3.6.5.1 as a result of Comment Number 3.6.4.2-8. For that change, while the addition of ITS 3.6.4.2 ACTIONS Note 3 is still an Administrative change, the addition of ITS 3.6.4.2 ACTIONS Note 2 becomes a Less Restrictive (L) change, because nothing in the ACTION statements of 3.6.5.1 imply separate condition entry. **Comment:** Revise the CTS markup and provide the appropriate discussions and justifications for these Administrative and Less Restrictive (L) changes. See Comment Number 3.6.4.2-8.

ComEd Response:

If a valve is open that is not allowed to be open, the Actions of CTS 3.6.5.2 are entered, not the Actions of CTS 3.6.5.1. CTS LCO 3.6.5.1 requires SECONDARY CONTAINMENT INTEGRITY to be maintained. The CTS definition of SECONDARY CONTAINMENT INTEGRITY, states, in part, that SECONDARY CONTAINMENT INTEGRITY exists when "All secondary containment penetrations required to be closed during accident conditions are ... Closed by at least one manual valve, blind flange, or de-activated automatic damper secured in its closed position, except as provided in Table 3.6.5.2-1 of Specification 3.6.5.2." Thus, when one of the two manual valves in a penetration is open, SECONDARY CONTAINMENT INTEGRITY is still met, since one valve is still closed, and the Actions of CTS 3.6.5.1 do not have to be entered. With one of the two valves open, this valve would be declared inoperable and the Actions of CTS 3.6.5.2 would be entered. Therefore, CTS 3.6.5.2 does apply to devices addressed in CTS 4.6.5.1.b.2. Separate Condition entry for each penetration flow path is allowed in CTS 3.6.5.2, therefore, DOC A.2 is sufficient to address the devices in CTS 4.6.5.1.b.2 and no additional justification is necessary. This is consistent with the ComEd interpretation of the requirement.

3.6.4.2-2 DOC A.3
 CTS 3.6.5.2 ACTION
 ITS 3.6.4.2 ACTION A

CTS 3.6.5.2 ACTION requires that with one or more secondary containment isolation dampers inoperable, one maintains at least one damper OPERABLE in each affected penetration that is open. The CTS markup deletes this requirement (maintain OPERABLE damper). This change is characterized as an Administrative change (DOC A.3). DOC A.3 states that CTS 3.6.5.2 ACTION does not specify whether a penetration has one or two valves, and that ITS 3.6.4.2 ACTION A only applies if one valve in a penetration is inoperable. While these statements are correct, DOC A.3 also states that "This inherently ensures maintaining' at least one isolation valve OPERABLE.'" This is incorrect. CTS 3.6.5.2 ACTION applies to penetrations with one isolation valve or two isolation valves. If the penetration with one valve has an inoperable valve, CTS 3.6.5.2 requires an immediate shutdown if in MODES 1, 2, and 3 or suspension of certain activities if in OPERATIONAL CONDITION* because one cannot maintain at least one OPERABLE valve in the penetration. ITS 3.6.4.2 ACTION A would allow 8 hours to isolate the penetration before requiring a shutdown or suspension of activities. Thus, ITS 3.6.4.2 ACTION A would allow the use of CTS 3.6.5.2 ACTIONS "either 1, 2, and 3" for penetrations with one valve. Thus the change is a Less Restrictive (L) change. **Comment:** Revise the CTS markup and provide the appropriate discussions and justifications for this Less Restrictive (L) change.

ComEd Response:

The ITS submittal will be revised to include a "Less Restrictive" DOC for this change.

3.6.4.2-3 DOC LD.1
 JFD 1
 Bases JFD 3
 CTS 4.6.5.2.b
 ITS SR 3.6.4.2.3 and Associated Bases

See Comment Number 3.6.0-1. Comment: See Comment Number 3.6.0-1.

ComEd Response: None

3.6.4.2-4 Bases JFD 1
 STS B3.6.4.2 Bases - BACKGROUND
 ITS B3.6.4.2 Bases - BACKGROUND

The last two sentences in STS B3.6.4.2 Bases - BACKGROUND state the following: "Check valves or other automatic valves designed to close without operator action following an accident are considered active devices. Isolation barrier(s) for the penetration are discussed in Reference 2." ITS B3.6.4.2 Bases - BACKGROUND deletes these sentences using the general nomenclature/system description justification (Bases JFD 1). This is unacceptable. Based on the CTS/ITS requirements, the rest of the ITS Bases discussions, and the DOCs/JFD, these statements are applicable to LaSalle and are needed to describe what is considered an active device. Comment: Delete this change.

ComEd Response:

The statements deleted are not considered to be necessary for the proper understanding and interpretation of the Specification. In addition, the Bases for ISTS 3.6.4.2, "Secondary Containment Isolation Valves (SCIVs)," in NUREG-1433, Rev.1, does not include these two statements. Therefore, the statements were also deleted for consistency. In addition, this change has been reviewed and accepted by the NRC in the Nine Mile Point Unit 2 ITS submittal.

3.6.4.2-5 Bases JFD 2
 Bases JFD 8
 STS B3.6.4.2 Bases - LCO
 ITS B3.6.4.2 Bases - LCO

The third paragraph of the Bases discussion of the LCO for STS 3.6.4.2 states "The normally closed isolation valves... are those listed in Reference 3." This paragraph deals

with those secondary containment isolation valves that are required to be closed during an accident and are in the closed position during normal operation. This paragraph has been modified in the ITS based on Bases JFD 8 which states that the discussion of the valves is incomplete and misleading. While the majority of the changes are acceptable, the change associated with Bases JFD 2 is not. Bases JFD 2 deletes the reference to the condition of normally closed automatic valves. The bases for the deletion is that these valves would be considered inoperable. This would be true if these valves were closed as a result of ITS 3.6.4.2 ACTION A or B, but the automatic valves of concern in this paragraph are those valves that are normally closed during normal operations and required to be closed during accidents. The paragraph in this case should be modified like the similar paragraph in ITS B3.6.1.3 Bases - LCO. **Comment: Revise the ITS markup and provide the appropriate discussions and justifications in accordance with the above discussion.**

ComEd Response:

The LaSalle 1 and 2 design does not include automatic secondary containment isolation valves that are normally de-activated and secured in the closed position. Therefore, Bases JFD 2 is correct and no change is necessary.

3.6.4.2-6 Bases JFD 5
 STS B3.6.4.2 Bases - APPLICABILITY
 ITS B3.6.4.2 Bases - APPLICABILITY

The last sentence in the second paragraph of STS B3.6.4.2 Bases - APPLICABILITY states the following: "Moving irradiated fuel assemblies in the [primary or secondary containment] may also occur in MODES 1, 2, 3." ITS B3.6.4.2 Bases - APPLICABILITY deletes this sentence. Based on descriptions in STS/ITS B3.6. Bases the staff concludes that this is a true statement for secondary containment at LaSalle and clarifies the paragraph discussion. Thus it should not have been deleted. In addition, the justification used for the deletion (Bases JFD 5) is inadequate. **Comment: Delete this change.**

ComEd Response:

While this statement in the ISTS 3.6.4.2 Applicability Bases is true, it is unnecessary to be stated in the Bases. This statement is also true for ISTS 3.6.4.1, Secondary Containment, and ISTS 3.6.4.3, Standby Gas Treatment System, which have the identical Applicability; however, it is not stated in the ISTS Applicability Bases for these two Specifications. Therefore, this statement was not included in the ITS 3.6.4.2 Applicability Bases in order to make the Applicability Bases for all three secondary containment related specifications the same, with respect to this issue. Therefore, JFD 5, (i.e., change made for consistency with similar phrases in other parts of the Bases) is adequate and appropriate. In addition, this JFD has been reviewed and approved by the NRC in the Nine Mile Point Unit 2 ITS submittal.

3.6.4.2-7 Bases JFD 5
 STS B3.6.4.2 Bases - D.1, D.2 and D.3

ITS B3.6.4.2 Bases - D.1, D.2 and D.3

See Comment Number 3.6.4.1-2. Comment: See Comment Number 3.6.4.1-2.

ComEd Response:

See response to NRC Comment 3.6.4.1-2.

3.6.4.2-8 CTS 3.6.5.1 ACTIONS
CTS 4.6.5.1.b.2
ITS 3.6.4.2 ACTIONS
ITS SR 3.6.4.2.1 and Associated Bases

CTS 4.6.5.1.b.2 verifies that all penetrations not capable of being closed by OPERABLE automatic isolation valves and required to be closed during accident conditions are closed by valves, blind flanges, or deactivated automatic valves secured in their positions. The corresponding ITS SR for this CTS surveillance is ITS SR 3.6.4.2.1. If CTS 4.6.5.1.b.2 cannot be met, the ACTIONS of CTS 3.6.5.1 are entered which require restoration of valve OPERABILITY within 4 hours or shutdown within the following 36 hours when in MODES 1, 2, or 3 or immediate suspension of fuel handling, CORE ALTERATIONS and OPDRVs when in OPERATIONAL CONDITION*. If ITS SR 3.6.4.2.1 cannot be met, the ACTIONS of ITS 3.6.4.2 are entered which allows for one valve to be inoperable for up to 8 hours before shutdown commences or suspension of fuel handling, CORE ALTERATION or OPDRVS. This Less Restrictive (L) change to the CTS is not justified. See Comment Numbers 3.6.4.2-1 and 3.6.4.2-9. Comment: Revise the CTS markup to show this Less Restrictive (L) change and provide the -appropriate discussions and justifications. See Comment Numbers 3.6.4.2-1 and 3.6.4.2-9.

ComEd Response:

If a valve is open that is not allowed to be open, the Actions of CTS 3.6.5.2 are entered, not the Actions of CTS 3.6.5.1. CTS LCO 3.6.5.1 requires SECONDARY CONTAINMENT INTEGRITY to be maintained. The CTS definition of SECONDARY CONTAINMENT INTEGRITY, states, in part, that SECONDARY CONTAINMENT INTEGRITY exists when "All secondary containment penetrations required to be closed during accident conditions are ... Closed by at least one manual valve, blind flange, or de-activated automatic damper secured in its closed position, except as provided in Table 3.6.5.2-1 of Specification 3.6.5.2." Thus, when one of the two manual valves in a penetration is open, SECONDARY CONTAINMENT INTEGRITY is still met, since one valve is still closed, and the Actions of CTS 3.6.5.1 do not have to be entered. With one of the two valves open, this valve would be declared inoperable and the Actions of CTS 3.6.5.2 would be entered. CTS 3.6.5.2 allows 8 hours to isolate the affected penetration. ITS 3.6.4.2 ACTIONS are consistent with this 8 hour allowance. Therefore, since the current time in the CTS to isolate a valve is consistent with the proposed time in the ITS to isolate a valve, no additional justification is necessary. This is consistent with the ComEd interpretation of the requirement.

3.6.4.2-9 CTS 3.6.5.1 ACTION b
CTS 3.6.5.2 ACTION c
ITS 3.6.4.2 ACTION D and Associated Bases

See Comment Number 3.6.4.1-3. Comment: See Comment Number 3.6.4.1-3.

ComEd Response:

This is not a "More Restrictive" change since it is not possible to perform CORE ALTERATIONS or Operations with the Potential for Draining the Reactor Vessel (OPDRVs) in MODE 1, 2, or 3. CTS 3.0.3 and ITS LCO 3.0.3 are only applicable in MODES 1, 2, and 3. Therefore, no change to the ITS submittal is necessary.

3.6.4.3 Standby Gas Treatment (SGT) System

3.6.4.3-1 DOC A.4
Bases JFD 2
STS B3.6.4.3 Bases - SR 3.6.4.3.1
ITS B3.6.4.3 Bases - SR 3.6.4.3.1

The third sentence in STS B3.6.4.3 Bases - SR 3.6.4.3.1 states the following: "operation [with the heaters on (automatic heater cycling to maintain temperature)] for ≥ 10 continuous hours..." ITS B3.6.4.3 Bases - SR 3.6.4.3.1 modifies this sentence by deleting "(automatic heater cycling to maintain temperature)." By deleting the clarifying words on heater cycling, the intent of the Bases discussion is changed to require that the heater be on continuously; i.e., not cycling on and off. DOC A.4 states that heaters do cycle on and off for proper system operation. Comment: Delete this change.

ComEd Response:

This change is correct. However, DOC A.4 is incorrect. DOC A.4 will be revised to delete the words "cycle properly when required."

3.6.4.3-2 DOC LD.1
JFD 1
Bases JFD 2
CTS 4.6.5.3.d
ITS SR 3.6.4.3.3 and Associated Bases

See Comment Number 3.6.0-1. Comment: See Comment Number 3.6.0-1.

ComEd Response: None

3.6.4.3-3 Bases JFD 4
STS B3.6.4.3 Bases - A.1
ITS B3.6.4.3 Bases - A.1

See Comment Number 3.6.2.1-1. **Comment:** See Comment Number 3.6.2.1-1.

ComEd Response:

See response to NRC Comment 3.6.2.1-1.

3.6.4.3-4 Bases JFD 4
 STS B3.6.4.3 Bases - C.1, C.2.1, C.2.2, and C.2.3
 STS B3.6.4.3 Bases - E.1, E.2, and E.3
 ITS B3.6.4.3 Bases - C.1, C.2.1, C. 2.2 and C.2.3
 ITS B3.6.4.3 Bases - F.1, F.2, and F.3

See Comment Number 3.6.4.1-2. **Comment:** See Comment Number 3.6.4.1-2.

ComEd Response:

See response to NRC Comment 3.6.4.1-2.

3.6.4.3-5 CTS 3.6.5.3 ACTION b
 ITS 3.6.4.3 ACTION E and Associated Bases

See Comment Number 3.6.4.1-3. **Comment:** See Comment Number 3.6.4.1-3.

ComEd Response:

This is not a "More Restrictive" change since it is not possible to perform CORE ALTERATIONS or Operations with the Potential for Draining the Reactor Vessel (OPDRVs) in MODE 1, 2, or 3. CTS 3.0.3 and ITS LCO 3.0.3 are only applicable in MODES 1, 2, and 3. Therefore, no change to the ITS submittal is necessary.
