August 18, 2000

Mr. Oliver D. Kingsley, President
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Executive Towers West III
1400 Opus Place, Suite 500
Downers Grove, IL 60515

SUBJECT: DRESDEN, LASALLE, QUAD CITIES - REQUEST FOR ADDITIONAL INFORMATION (TAC NOS. MA8382, MA8383, MA8390, MA8388, MA8378 AND MA8379)

Dear Mr. Kingsley:

By letter dated March 3, 2000, Commonwealth Edison Company (ComEd) submitted an application to convert 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 the improved Standard Technical Specifications (iSTS). The staff requires additional information in order to complete its review of Sections 3.3 and 3.7 of your application. Please respond to the enclosed request for additional information (RAI) and make any necessary revisions to the iSTS submittal within 60 days of receipt of this letter.

The staff forwarded you these questions in draft on June 30, 2000, to allow discussion of the questions before the formal RAI was issued. The staff discussed the questions on July 18, 2000, and the results of that discussion have been incorporated into these questions. If you have any questions about this letter or about the staff's review of your submittal, please contact me at (301) 415-1321.

Sincerely,

/RA/

Stewart N. Bailey, Project Manager, Section 2
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-237, 50-249, 50-373,
50-374, 50-254, 50-265

Enclosures:
1. Section 3.3 RAI for Dresden
2. Section 3.3 RAI for Quad Cities
3. Section 3.3 RAI for LaSalle
4. Section 3.7 RAI for all stations

cc w/encls: See next page

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Quad Cities, Units 1 and 2

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Sincerely,

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1. Section 3.3 RAI for Dresden
2. Section 3.3 RAI for Quad Cities
3. Section 3.3 RAI for LaSalle
4. Section 3.7 RAI for all stations

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ACCESSION NO.: ML003747254

OFFICE	PM:LPD3	LA:LPD3	BC:RTSB	SC:LPD3
NAME	SBailey	CMoore	WBeckner	AMendiola
DATE	08/10/00	08/9/00	08/8/00	08/18/00

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REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.3
DRESDEN

3.3.1.1, RPS Instrumentation

3.3.1.1-01 No DOC

CTS Table 4.1.A Note (d)

CTS Table 4.1.A-1 Note d states that APRM gain adjustments according to Specification 3.11.B shall not be included in the comparison with the heat balance. This requirement is not carried over to the ITS and no DOC is provided.

ComED Response:

3.3.1.1-02 DOC A.11

CTS Table 3.1.A-1

ITS 3.3.1.1, Actions 13 & 19

Based on the content and language of DOC A.11, the proposed translation of CTS action requirement into ITS are non-administrative changes; but they are acceptable. One non-administrative change results from a difference in reporting requirements if the action is not completed (a difference in the 50.72 notification reports). Another non-administrative change results from a specified ITS action which is less restrictive than CTS requirements because it only requires action to initiate action to perform the same requirement (insert control rods) vice insert the control rods. Additionally, the time to complete the required action is more restrictive because time is reduced from within one hour to complete the actions to a requirement to immediate initiate action to perform the action. For each change noted above, discuss the categorization differences.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.1.1-03 DOC L.7, JFD 15

CTS 4.1.A-1, Note (d)

ITS Actions Note 2 and ITS SR 3.3.1.1.2 JFD

The allowance for APRM channel gain adjustments provided in STS SR 3.3.1.1.2, Note 2 permits the adjustment per LCO 3.2.4, “APRM Gain and Setpoints.” The proposed change is to include the gain adjustment as Note 2 to the LCO Actions. This change proposes to maintain the CTS allowance giving 2 and 12 hour times to adjust neutron monitoring channels. The staff notes that a CTS change results when proposed Actions Note 2 is applied to the ITS 6 hour topical report surveillance test interval allowed outage time. The resulting CTS change is that LCO Actions Note 2 gives 8 and 20 hours to adjust channels to conform to the calorimetric. This change to the CTS and deviation from the STS is not evaluated in either DOC L.7 or JFD 1. State your position for not adopting the STS for APRM gain adjustment as applied in STS SR 3.3.1.1.2. In order to consider extending the time a channel can be inoperable beyond that approved by the staff topical report NEDO-30851-P-A submit supporting analysis consistent with the level of detail established in the topical report. The staff recommends adopting STS SR 3.3.1.1.2, Note 2 for APRM adjustments.

ComED Response:

3.3.1.1-04 -Not Used

3.3.1.1-05 No DOC
CTS Table 4.1.A-1 applies table note (b) to the once per shift (S) CHANNEL CHECK for IRM Neutron Flux - High (1.a) and APRM Setdown Neutron Flux - High (2.a) Functions. Note (b) is translated as ITS SR 3.3.1.1.6 with a stated “Prior to withdrawing SRMs frequency. The frequency portion of CTS Note (b) states that the IRM and SRM channels shall be determined to overlap “during each startup after entering OPERATIONAL MODE 2.” Clarify how the ITS frequency is equivalent to the CTS frequency.
ComED Response:

3.3.1.1-06 JFD 11
ITS 3.3.1.1
Document current practice showing that SRMs are partially withdrawn prior to verifying overlap.
ComED Response:

3.3.1.1-07 JFD 13
ITS 3.3.1.1
Dresden unique Applicability: MSIV closure and Condenser Low Vacuum required in Mode 2, ≥ 600 psig
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.1.2, SRM Instrumentation

3.3.1.2-01 DOC M.2
CTS 3.10.B
ITS SR 3.3.1.2.2 and SR 3.3.1.2.4
Two items to evaluate. First, clarify how the citation of CTS 3.9.2 relates to the proposed M-DOC justification. Second, explain how the ITS SR 3.3.1.2.4 and SR 3.3.1.2.2 citations justify that the proposed CTS deletions result in additional limits to plant operations.
ComED Response:

3.3.1.2-02 DOC M.5
CTS 4.2.G.3
ITS SR 3.3.1.2.7
CTS 4.10.B.2 markup does not show the addition of SR 3.3.1.2.5 Note per JFD 4.
ComED Response:

3.3.1.2-03 DOC LA.3
CTS 3.10.B
ITS SR 3.3.1.2.4
This CTS requirement appears to be a unique operational limit that should be included in Table 3.3.1.2-1, Note c for a special moveable detector. Explain.
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.2.1, Control Rod Block Instrumentation

3.3.2.1-01 DOC M.5
ITS 3.3.2.1, SR 3.3.2.1.6
Newly proposed SR 3.3.2.1.6 requires verification that the RWM is not inadvertently bypassed

with power level ≤10% RTP. However, the DOC M.5 stated the power level to be ≤20%. Clarify which power level is to be used for the ITS.
ComED Response:

3.3.2.1-02 - Not Used

3.3.2.1-03 DOC L.2
CTS 4.3.L.2
ITS SR 3.3.2.1.2
The DOC justifies the test extension to 92d. Clarify the basis for the SR frequency and its impact on safe operation of the facility.
ComED Response:

3.3.2.2, Feedwater Main Turbine Trip Instrumentation

3.3.2.2-01 DOC L.2
CTS Table 3.2.J-1 Action 90.b
ITS 3.3.2.2, Required Action B.1
Revise the DOC to include discussion and a citation of approved TSTF 297 that incorporates the changes like those proposed by L.2
ComED Response:

3.3.3.1, PAM Instrumentation

3.3.3.1-01 DOC LA.1
CTS Table 3.2.F-1 ACTION 61
ITS 5.5.6
CTS requirements to "use alternate methods of monitoring" establishes a requirement to perform an action. This requirement cannot be relocated to the Bases because the Bases cannot contain TS requirements. Revise DOC LA.1 to address these items.
ComED Response:

3.3.3.1-02 - Not Used

3.3.3.1-03 - Not Used

3.3.3.1-04 DOC L.4
CTS Table 3.2.F-1 ACTION 60b
ITS 3.3.3.1 Required Action C.1
Describe the alternate method of monitoring that can be used for those CTS PAM instruments that have CTS Table 3.2.F-1, Action 60 or 62 specified. CTS do not require these variables to have alternate methods. Justify the change to CTS.
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.3.1-05 DOC L.5
CTS Table 3.2.F-1 ACTION 61
ITS 3.3.3.1 Required Action C.1
This DOC incorrectly discusses ITS requirements following attempts to repair inoperable channels. The ITS does not specific initiating preplanned alternate methods, as stated. Instead the ITS specify required actions to comply with ITS 5.6.6. Provide a revised DOC

which addressed the proposed less restrictive changes that result from the deletion of the 72 hour limit to initiate preplanned alternate methods.

ComED Response:

3.3.3.2, Remote Shutdown Instrumentation

3.3.3.2-01 JFD 1

No ITS specification

No technical specification is provided for the Remote Shutdown System, based upon the fact that it is not required for the mitigation of any design basis accident. The Remote Shutdown System is required for the mitigation of a design basis accident (fire). It is simply not included among the spectrum of events requiring analysis in SAR Chapter 15 because system's function is to allow the operators to prevent nuclear and thermal transient in the event of a fire. Consequently, transient analysis is unnecessary. The Remote Shutdown System was generically determined to meet the selection criteria during development of the STS and during promulgation of the Commission Policy Statement on Technical Specifications. The JFD describes no special circumstance that would indicate that 10 CFR 50.36 does not apply. Add an LCO for the Remote Shutdown System to the ITS. Without the RSS LCO, the Dresden TS are inconsistent with LaSalle TS

ComED Response:

3.3.4.1, ATWS-RPT Instrumentation

3.3.4.1-01 DOC M.1

CTS 3.2.C Action 2 and 4

ITS 3.3.4.1 ACTION B and ACTION C,

Insert CTS 3.2.C completion times as referenced in the discussion of change to show that the ITS completion time durations are shorter.

ComED Response:

3.3.4.1-02 DOC L.2

CTS 3.2.C Action 3

ITS 3.3.4.1 Required Action A.1

Insert CTS 3.2.C completion times as referenced in the discussion of change to show that the ITS completion time durations are shorter.

ComED Response:

3.3.4.1-03 DOC L.3

CTS 3.2.C

Explain in a) to DOC L.3 that the ITS represents a loss of trip function redundancy condition.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.4.1-04 DOC L.3

CTS 3.2.C

Beginning with the sentence, "In addition, when one channel..." provide a comparison to ITS requirements to explain the proposed less restrictive changes.

ComED Response:

3.3.4.1-05 DOC L.3

CTS 3.2.C

If CTS Action 6 is consistent with ITS Action C then DOC L.3, d) appears to be an A-DOC. Evaluate and revise as appropriate.
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.5.1, ECCS Instrumentation

3.3.5.1-01 No DOC
CTS 4.2.B, Table 4.2.B-1, Function 3.d
ITS 3.3.5.1, Table 3.3.5.1-1, Function 3.e, Surveillance Requirement
The CTS requires no channel calibration for the Suppression Chamber Water Level-High level switches. The STS requires channel calibration and trip unit calibration for this function. Add the appropriate Channel Calibration (SR 3.3.5.1.4) and Trip Unit Calibration (SR 3.3.5.1.3) requirements.
ComED Response:

3.3.5.1-02 DOC A.8
CTS 3/4.2.B Functions 4.e, 4.f, 5.e and 5.f
ITS 3.3.5.1-1, Functions 4.d, 4.e, 5.d and 5.e
ITS markup shows two required channels for Functions 4.d and 5.d, and four required channels for Functions 4.e and 5.e vice the 2 per pump shown in the CTS markup. Resolve this discrepancy.
ComED Response:

3.3.5.1-03 DOC A.13
Provide further clarification explaining the administrative basis for this change. Proposed changes appear to be less restrictive or more restrictive.
ComED Response:

3.3.5.1-04 DOC A.14
Provide further clarification explaining the administrative basis for this change. Proposed changes appear to be more restrictive.
ComED Response:

3.3.5.1-05 - Not Used

3.3.5.1-06 - Not Used

3.3.5.1-07 - Not Used

3.3.5.1-08 - Not Used

3.3.5.1-09 DOC M.2
CTS Table 3.2.B-1 Functional Unit 1.d
ITS Table 3.3.5.1-1 Function 1.d
CTS requirements are changed to 1/pump from 1/loop minimum channels per trip function. Provide a DOC for this change to the CTS.
ComED Response:

3.3.5.1-10 DOC M.7
CTS Table 3.2.B-1
ITS Table 3.3.5.1-1, Function 3.d
DOC M.7 states that Note (d) has been added to clarify that with the HPCI isolated from a CCST, only the 2 CCST channels associated with the unisolated tank are required.
The note is missing from the CTS markup and the ITS markup. Explain the absence of the proposed note.
ComED Response:

3.3.5.1-11 JFD 10
STS Table 3.3.5.1-1, Function 2.e
Reactor Vessel Shroud Level-Level 0 relocation documentation is not included in CTS 3/42.I DOCs as stated in JFD-10. The Level-0 function is not in the CTS.. Since this function is required to be in TS by criterion in 10 CFR 50.36 what is the basis for relocating it to the FSAR. Explain the justification and provide the missing documentation.
ComED Response:

3.3.5.2, IC Instrumentation

3.3.5.2-01 DOC A.3
CTS 4.2.D.1
ITS 3.3.5.2
Adoption of a 24 hour repair AOT per ComEd letter JMHLTR00-0002 dated January 11, 2000 probably means the Isolation Condenser pressure instrument channels are common to ECCS and it is unclear why the current licensing basis (and proposed ITS) do not include a test to evaluate sensor behavior with a periodic qualitative test. Provide a design-basis reason for not including an instrument channel check.
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.6.1, Primary Containment Isolation Instrumentation

3.3.6.1-01 DOC A.8
CTS Table 4.2.A-1 Functional Units 3.e, and 6.c
ITS Table 3.3.6.1-1, Functions 1.e, and 3.d
The proposed change is to provide a single SR CHANNEL CALIBRATION for the Main Steam Line Tunnel Temperature-High and HPCI Turbine Area Temperature-High functions that have requirements to perform the CHANNEL FUNCTIONAL TEST at an interval equal to the longer calibration test interval. The licensee states that testing requirements would be equivalent because the CHANNEL CALIBRATION encompasses the CHANNEL FUNCTIONAL TEST; however, the staff notes that the CTS for these functions show both the CFT and the Channel Calibration with the longer intervals. Adopting STS is consistent with CTS requirements. Combining the CFT and Calibration obfuscates the basis for having a unique CFT testing interval. Thus, if future sensor behavior warranted a shorter CFT test frequency then the licensee could claim that TS do not require a CHANNEL FUNCTIONAL TEST. Add a 24 month CFT for ITS functions 1.e and 3.d per CTS requirements.
ComED Response:

3.3.6.1-02 DOC A.10
CTS 4.2.A, Table 4.2.A-1, Functions 3.e, 6.c
ITS 3.3.6.1, Table 3.3.6.1-1, Functions 1.e, 3.e
The CTS and STS require a Channel Functional Test for Main Steam Line Tunnel Temperature-High and HPCI Isolation on high area temperatures. This requirement has been

deleted from the STS based upon the fact that these functions are implemented with temperature switches instead of a combination of a temperature sensor and bistable. Channel Functional tests are generally appropriate for sensing switches. For example, the ITS retains the Channel Functional Test for the Main Steam Line Pressure-Low (SR 3.3.6.1.2) pressure switches. Add SR 3.3.6.1.2 to the list of surveillances required for these functions.
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.6.1-03 JFD 1
ITS Table 3.3.6.1-1, F 1.d, MSL Flow-High
CTS Table 3.2.A-1, F 3.d, MSL Flow-High
For Function 2.d, the Bases state that the MSL flow signals are initiated from 16 differential pressure switches that are connected to the four MSLs (the differential pressure switches sense differential pressure across a flow restriction)..... all four connected to one MSL would be able to detect the high flow. The Action B.1 Bases state this action is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same Function result in redundant automatic isolation capability being lost for the associated penetration flow path(s). Further, the Bases state that the MSL Functions are considered to be maintaining isolation capability when sufficient channels are OPERABLE or in trip, such that both trip systems will generate a trip signal from the given Function on a valid signal. "For Function 1.d, this would require both trip systems to have one channel associated with each MSL, OPERABLE or in trip." Explain how a single channel operable in both trip systems associated with each MSL will preserve the ability to detect differential pressure across a MSL flow orifice.
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.6.1-04 JFD 5
CTS Table 3.2.A-1, Note (j)
ITS Table 3.3.6.1-1, Note (a)
The CTS table note requires all four switches of the HPCI Turbine Area High isolation function to be in either of 2 groups for each trip system. The ITS specifies the note as requiring as all four channels to be associated with a single trip string. The CTS changes were not evaluated in a DOC. The proposed TS for Note (a) to Table 3.3.6.1-1 does not provide an adequate basis for the requirement. Provide a CTS DOC for proposed changes. Also provide a revised Bases discussion, explaining the basis for the TS requirement.
ComED Response:

3.3.6.1-05 JFD 7
CTS Table 4.2.A-1, Function 6.c
CTS HPCI function isolations are referred to as "Area Temperature" monitors. This nomenclature was put into place at the TS upgrade project in 1996. The ITS proposal is to adopt new nomenclature which specify "HPCI Turbine Area Temperature" functions. It appears that the pipe room area monitors may be omitted with the newly defined area.
Provide a DOC for the nomenclature change. Show which sensors are included to meet current TS SR. Identify the sensors by the room or plant area in which they are located.
ComED Response:

3.3.6.2, Secondary Containment Isolation Instrumentation

3.3.6.2-01 DOC LA.4
CTS 4.7.P.4.b.2

CTS 3.2.A.3 footnote (c) is revised as discussed in DOC LB.1. DOC LB.1 was not included in the submittal for Chapter 3.3.6.2. Provide the missing DOC.
ComED Response:

3.3.6.2-02 JFD 3
ITS 3.3.6.2, Actions A and B, SR Table Note 2
Proposed changes delete the reference to secondary containment. Show that this deviation from the STS, Rev. 1 is included in an approved TSTF. Revise the ITS to include the approved version of the STS actions.
ComED Response:

3.3.6.3, Relief Valve Instrumentation

3.3.6.3-01 JFD 1
ITS 3.3.6.3, Table 3.3.6.3-1, Functions 1.a, 2.a
The STS provides both open and close setpoints for the relief and low set relief valves. The CTSS provides on open setpoints. The lack of close setpoints has been carried over to the ITS. Both the open and close setpoints of the relief valves are important to safety function. Thus both settings should be addressed in the ITS. Add Allowable Values for the valve close setpoints to Table 3.3.6 3-1.
ComED Response:

3.3.7.1, CREV System Instrumentation

3.3.7.1-01 DOC M.1
The proposed specification includes a 6 hour repair time (AOT) for channel inoperability and a 6 hour test time (AOT). In other specifications this repair AOT is based on a topical report analysis for test and repair AOT extensions.

Show that topical reports NEDC-31677P-A and GENE-770-06-1-A are applicable to these exhaust duct radiation detector channels and the NRR staff has issued an approved SE for use of these AOTs. This applies to the ACTION requirements NOTE, to the Completion Time in Action A.1, and to the Surveillance Requirements test AOT Note.
ComED Response:

3.3.8.1, LOP Instrumentation

3.3.8.1-01 JFD 2
CTS Table 3.2.B-1, Functions 5.b, degraded voltage
ITS Table3.3.8.1-1, Functions 2.a, degraded voltage
Add upper limit values for the Table 3.3.8.1-1 Degraded Voltage Function which are omitted from the ITS.

Presently CTS Table 3.2.B-1 require that the Trip Setpoint for the Degraded Voltage instrumentation be greater than or equal to some specified value. Because there is no upper limit specified for these values, it is possible that the settings of this instrumentation could be left in a region that would cause separation from the offsite power system following the increased electrical loading associated with an accident event, even though the offsite system voltage is perfectly adequate to power the safety loads. Therefore, the proposed ITS are such that a system (degraded voltage protection system) could satisfactorily meet the acceptance criteria specified in its surveillance requirement but would render a technical specification

required system (offsite power system) inoperable. The requirement for the technical specification upper limit on this instrumentation is also specified in Branch Technical Position PSB-1 in the NRC Standard Review Plan and in the original generic letter that went out to licensees on this issue.

The situation has become more critical in recent years because many utilities have increased the setpoint values of their degraded voltage protection in response to EDSFI and their own findings that the original setpoints were not fully protecting all safety equipment. The result is that there is now less margin between the setpoint and the normal minimum switchyard voltages of the offsite power system, particularly during accident events when the safety systems are most needed. NRC Information Notice 95-37 identifies and discusses this problem. Even more recent are concerns related to double sequencing. Double sequencing is what occurs during an accident event when the degraded voltage protection actuates. Safety loads begin sequencing on the offsite power system and are subsequently de-energized and re-sequenced onto the onsite system following actuation and timeout of the degraded voltage protection. This would occur if a legitimate degraded voltage was detected, and would also occur if there was no degraded voltage but the degraded voltage protection setpoint was set too high. Many plants have the logic necessary to re-sequence safety loads but have not done the electrical, hydraulic, and thermal analysis necessary to demonstrate that safety equipment would not be lost or damaged as a result of the double sequencing. Therefore the only assured protection that presently exists against this scenario is to preclude it from happening in the first place by making the likelihood of the scenario reasonably low. An upper limit on the setpoint is a necessary element of this. Concerns that upcoming utility deregulation could result in lower offsite voltages further support the need to maintain control of the setpoint upper limit to preclude double sequencing.

ComED Response:

3.3.8.2, RPS-EPA Instrumentation

no RAIs

REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.3
QUAD CITIES

3.3.1.1, RPS Instrumentation

3.3.1.1-01 No DOC
CTS Table 4.1.A Note (d)

CTS Table 4.1.A-1 Note d states that APRM gain adjustments according to Specification 3.11.B shall not be included in the comparison with the heat balance. This requirement is not carried over to the ITS and no DOC is provided.

ComED Response:

3.3.1.1-02 DOC A.11
CTS Table 3.1.A
ITS 3.3.1.1, Action H

Based on the content and language of DOC A.11, the proposed translation of CTS action requirement into ITS are non-administrative changes; but they are acceptable. One non-administrative change results from a difference in reporting requirements if the action is not completed (a difference in the 50.72 notification reports). Another non-administrative change results from a specified ITS action which is less restrictive than CTS requirements because it only requires action to initiate action to perform the same requirement (insert control rods) vice insert the control rods. Additionally, the time to complete the required action is more restrictive because time is reduced from within one hour to complete the actions to a requirement to immediate initiate action to perform the action. For each change noted above, discuss the categorization differences.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.1.1-03 DOC A.16
CTS Table 4.1.A-1

Footnote (q) states that until instrument upgrades are completed the SR channel check is N/A and the channel calibration is quarterly. Following the <u>upgrade</u> the SR channel check is daily and the channel calibration is “E” proposed to go to “24 months.” Provide safety analysis to support the plant modification by justifying extending the calibration frequency to 24 months from 3 months (quarterly).

ComED Response:

3.3.1.1-04 DOC L.7, JFD 15
CTS 4.1.A-1, Note (d)
ITS Actions Note 2 and ITS SR 3.3.1.1.2 JFD 1.

The allowance for APRM channel gain adjustments provided in STS SR 3.3.1.1.2, Note 2 permits the adjustment per LCO 3.2.4, “APRM Gain and Setpoints.” The proposed change is to include the gain adjustment as Note 2 to the LCO Actions. This change proposes to maintain the CTS allowance giving 2 and 12 hour times to adjust neutron monitoring channels. The staff notes that a CTS change results when proposed Actions Note 2 is applied to the ITS 6 hour topical report surveillance test interval allowed outage time. The resulting CTS change is that LCO Actions Note 2 gives 8 and 20 hours to adjust channels to conform to the calorimetric. This change to the CTS and deviation from the STS is not evaluated in either DOC L.7 or JFD

1. State your position for not adopting the STS for APRM gain adjustment as applied in STS SR 3.3.1.1.2. In order to consider extending the time a channel can be inoperable beyond that approved by the staff topical report NEDO-30851-P-A submit supporting analysis consistent with the level of detail established in the topical report.
The staff recommends adopting STS SR 3.3.1.1.2, Note 2 for APRM adjustments.
ComED Response:

3.3.1.1-05 - Not Used

3.3.1.1-06 No DOC
CTS Table 4.1.A-1 applies table note (b) to the once per shift (S) CHANNEL CHECK for IRM Neutron Flux - High (1.a) and APRM Setdown Neutron Flux - High (2.a) Functions. Note (b) is translated as ITS SR 3.3.1.1.6 with a stated "Prior to withdrawing SRMs frequency. The frequency portion of CTS Note (b) states that the IRM and SRM channels shall be determined to overlap "during each startup after entering OPERATIONAL MODE 2." Clarify how the ITS frequency is equivalent to the CTS frequency.
ComED Response:

3.3.1.1-07 JFD 11
ITS 3.3.1.1
Document current practice showing that SRMs are partially withdrawn prior to verifying overlap.
ComED Response:

3.3.1.2, SRM Instrumentation

3.3.1.2-01 DOC M.2
CTS 3.10.B
ITS SR 3.3.1.2.2 and SR 3.3.1.2.4
Two items to evaluate. First, clarify how the citation of CTS 3.9.2 relates to the proposed M-DOC justification. Second, explain how the ITS SR 3.3.1.2.4 and SR 3.3.1.2.2 citations justify that the proposed CTS deletions result in additional limits to plant operations.
ComED Response:

3.3.1.2-02 DOC M.5
CTS 4.2.G.3
ITS SR 3.3.1.2.7
CTS 4.10.B.2 markup does not show the addition of SR 3.3.1.2.5 Note per JFD 4 .
ComED Response:

3.3.1.2-03 DOC LA.3
CTS 3.10.B
ITS SR 3.3.1.2.4
This CTS requirement appears to be a unique operational limit that should be included in Table 3.3.1.2-1, Note c for special moveable detector. Explain.
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.1.2-04 -Not Used

3.3.2.1, Control Rod Block Instrumentation

3.3.2.1-01 -Not Used

3.3.2.1-02 DOC L.2
CTS 4.3.L.2
ITS SR 3.3.2.1.2
The DOC justifies the test extension to 92d. Clarify the basis for the SR frequency and its impact on safe operation of the facility.
ComED Response:

3.3.2.2, FW/MTT Instrumentation

3.3.2.2-01 DOC L.2
CTS Table 3.2.J-1 Action 90.b
ITS 3.3.2.2, Required Action B.1
Revise the DOC to include discussion and a citation of approved TSTF 297 that incorporates the changes like those proposed by L.2
ComED Response:

3.3.3.1, PAM Instrumentation

3.3.3.1-01 No DOC
ITS 3.3.3.1, Surveillance Requirements, Notes
The notes on the Surveillance Requirements are labeled as numbers 6 and 7. The numbering does not correspond to the DOC. Renumber the notes.
ComED Response:

3.3.3.1-02 DOC LA.1
CTS Table 3.2.F-1 ACTION 61
ITS 5.5.6
The CTS requirement: “use alternate methods of monitoring,” establishes a requirement to take and action. In general, TS requirements cannot be relocated to the Bases. Prepare discussions to be included in DOC LA.1 to address these items.
ComED Response:

3.3.3.1-03 - Not Used

3.3.3.1-04 - Not Used

3.3.3.1-05 DOC L.4
CTS Table 3.2.F-1 ACTION 60b
ITS 3.3.3.1 Required Action C.1
Describe the alternate method of monitoring that can be used for those CTS PAM instruments that have CTS Table 3.2.F-1, Action 60 or 62 specified. CTS do not require these variables to have alternate methods. Justify the change to CTS.
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.3.1-06 DOC L.5
CTS Table 3.2.F-1 ACTION 61
ITS 3.3.3.1 Required Action C.1
This DOC incorrectly discusses ITS requirements following attempts to repair inoperable channels. The ITS does not specify initiating preplanned alternate methods, as stated. Instead

the ITS specify required actions to comply with ITS 5.6.6. Provide a revised DOC which addressed the proposed less restrictive changes that result from the deletion of the 72 hour limit to initiate preplanned alternate methods.

ComED Response:

3.3.3.1-07 - Not Used

3.3.3.1-08 - Not Used

3.3.3.2, Remote Shutdown Instrumentation

3.3.3.2-01 JFD 1

No ITS specification

No technical specification is provided for the Remote Shutdown System, based upon the fact that it is not required for the mitigation of any design basis accident. The Remote Shutdown System is required for the mitigation of a design basis accident (fire). It is simply not included among the spectrum of events requiring analysis in SAR Chapter 15 because system's function is to allow the operators to prevent nuclear and thermal transient in the event of a fire. Consequently, transient analysis is unnecessary. The Remote Shutdown System was generically determined to meet the selection criteria during development of the STS. The JFD describes no special circumstance that would indicate the STS analysis does not apply. Add a LCO for the Remote Shutdown System to the ITS. Without the RSS LCO, the Quad Cities TS are inconsistent with LaSalle TS.

ComED Response:

3.3.4.1, ATWS-RPT Instrumentation

3.3.4.1-01 DOC M.1

CTS 3.2.C Action 2 and 4

ITS 3.3.4.1 ACTION B and ACTION C,

Insert CTS 3.2.C completion times as referenced in the discussion of change to show that the ITS completion time durations are shorter.

ComED Response:

3.3.4.1-02 DOC L.2

CTS 3.2.C Action 3

ITS 3.3.4.1 Required Action A.1

Insert CTS 3.2.C completion times as referenced in the discussion of change to show that the ITS completion time durations are shorter.

ComED Response:

3.3.4.1-03 DOC L.3

CTS 3.2.C

Explain in a) to DOC L.2 that the ITS represents a loss of trip function redundancy condition.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.4.1-04 DOC L.3

CTS 3.2.C

Beginning with the sentence, "In addition, when one channel..." provide a comparison to ITS requirements to explain the proposed less restrictive changes.

ComED Response:

3.3.4.1-05 DOC L.3

CTS 3.2.C

If CTS Action 6 is consistent with ITS Action C then L.3, d) appears to be an A-DOC. Evaluate and revise as appropriate.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.5.1, ECCS Instrumentation

3.3.5.1-01 No DOC

CTS 4.2.B, Table 4.2.B-1, Function 3.d

ITS 3.3.5.1, Table 3.3.5.1-1, Function 3.e, Surveillance Requirement

The CTS requires no channel calibration for the Suppression Chamber Water Level-High level switches. The STS requires channel calibration and trip unit calibration for this function. Add the appropriate Channel Calibration (SR 3.3.5.1.6) and Trip Unit Calibration (SR 3.3.5.1.5) requirements.

ComED Response:

3.3.5.1-02 DOC A.8

CTS 3/4.2.B Functions 4.e, 4.f, 5.e and 5.f

ITS 3.3.5.1-1, Functions 4.d, 4.e, 5.d and 5.e

ITS markup shows two required channels for Functions 4.d and 5.d and four required channels for Functions 4.e and 5.e vice the 2 per pump shown in the CTS markup. Resolve this discrepancy.

ComED Response:

3.3.5.1-03 - Not Used

3.3.5.1-04 - Not Used

3.3.5.1-05 - Not Used

3.3.5.1-06 - Not Used

3.3.5.1-07 DOC M.2

CTS Table 3.2.B-1 Functional Unit 1.d

ITS Table 3.3.5.1-1 Function 1.d

CTS requirements are changed to 1/pump from 1/loop minimum channels per trip function. Provide a DOC for this change to the CTS.

ComED Response:

3.3.5.1-08 JFD 5

ITS SR 3.3.5.1.2 and SR 3.3.5.1.3

These two new surveillance requirements apply to the Reactor Vessel Water Level-Low ECCS Function. These functions have a 24 hour repair AOT. Typically, isolation actuation instrumentation (LCO 3.3.6.1) are common to (shares this same instrument loop) with either ECCS or RPS functions. For instruments common to ECCS a 24 hour repair AOT is specified and others (RPS common instruments) have a 12 hour repair AOT. In LCO 3.3.6.1 Quad Cities adopted 24 hr. AOT for the Level Low function; however, surveillances specify a 92d CFT, and a 24 month CHANNEL CALIBRATION. These longer test times are based on Topical

Report surveillance test extensions. Explain why the Level Low ECCS surveillance frequencies are different from the Level Low Isolation Actuation instrumentation.
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.5.1-09 JFD 11
STS Table 3.3.5.1-1, Function 2.e
Reactor Vessel Shroud Level-Level 0 relocation documentation is not included in CTS 3/4.2.I DOCs as stated in JFD-10. The Level-0 function is not in the CTS. Since this function is required to be in TS by criterion in 10 CFR 50.36 what is the basis for relocating it to the FSAR. Explain the justification and provide the missing documentation.
ComED Response:

3.3.5.2, RCIC Instrumentation

3.3.5.2-01 No DOC
CTS 4.2.B, Table 4.2.B-1, Function 3.d
ITS 3.3.5.2, Table 3.3.5.2-1, Function 4, Surveillance Requirement
The CTS requires no channel calibration for the Suppression Chamber Water Level-High level switches. The STS requires channel calibration and trip unit calibration for this function. The calibration of this function must be verified to ensure Operability for the same reasons discussed in 3.3.5.2, DOC M.2. Add the appropriate Channel Calibration requirements.
ComED Response:

3.3.5.2-02 JFD 3
ITS 3.3.5.2, Table 3.3.5.2-1, Function 3.d
Both Contaminated Condensate Storage Tanks (CCST) are assumed to supply water to the safety related pumps. Change ITS Table 3.3.5.2-1, Function 3.d to require channels for each CCST tank (2 per tank) to be operable.
ComED Response:

3.3.6.1, Primary Containment Isolation Instrumentation

3.3.6.1-01 No DOC
CTS 3.2.A, Table 3.2.A-1, Functions 5.b, 6.b
ITS 3.3.6.1, Table 3.3.6.1-1, Function 4.c, 3.c
The CTS requires RCIC and HPCI isolation on Reactor Vessel Pressure-Low. The STS requires RCIC and HPCI Isolation on RCIC/HPCI Steam Supply Line Pressure-Low. The ITS includes the STS function not the CTS function. The change from RPV Pressure Low to RCIC/HPCI Supply Pressure -Low has not been discussed in a DOC. Provide a DOC to justify these changes.
ComED Response:

3.3.6.1-02 DOC A.9
CTS Table 3.2.A-1, footnote g
ITS Table 3.3.6.1-1, footnote b
The CTS footnote specifies one trip system is required to be operable in Modes 4 or 5 if RHR Shutdown Cooling System integrity is maintained. The ITS note specifies a different requirement, one channel per trip system with isolation signal available to one pump isolation valve (paraphrased). Provide discussion of these differences. A new DOC may be needed if changes do not meet the A-D0C categorization.
ComED Response:

3.3.6.1-03 DOC A.10

CTS 4.2.A, Table 4.2.A-1, Functions 3.e, 5.c, 6.c

ITS 3.3.6.1, Table 3.3.6.1-1, Functions 1.e, 3.e, 4,d

The proposed change is to provide a single SR CHANNEL CALIBRATION for the Main Steam Line Tunnel Temperature-High and HPCI Turbine Area Temperature-High functions that have requirements to perform the CHANNEL FUNCTIONAL TEST at an interval equal to the longer calibration test interval. The licensee states that testing requirements would be equivalent because the CHANNEL CALIBRATION encompasses the CHANNEL FUNCTIONAL TEST; however, the staff notes that the CTS for these functions show both the CFT and the Channel Calibration with the longer intervals. Adopting STS is consistent with CTS requirements. Combining the CFT and Calibration obfuscates the basis for having a unique CFT testing interval. Thus, if future sensor behavior warranted a shorter CFT test frequency then the licensee could claim that TS do not require a CHANNEL FUNCTIONAL TEST. Add a 24 month CFT for ITS functions 1.e and 3.d per CTS requirements.

ComED Response:

3.3.6.1-04 JFD 1

ITS Table 3.3.6.1-1, F 1.d, MSL Flow-High

CTS Table 3.2.A-1, F 3.d, MSL Flow-High

For Function 2.d, the Bases state that the MSL flow signals are initiated from 16 differential pressure switches that are connected to the four MSLs (the differential pressure switches sense differential pressure across a flow restrictor)... all four connected to one MSL would be able to detect the high flow. The Action B.1 Bases state this action is intended to ensure that appropriate actions are taken if multiple, inoperable, untripped channels within the same Function result in redundant automatic isolation capability being lost for the associated penetration flow path(s). Further, the Bases state that the MSL Functions are considered to be maintaining isolation capability when sufficient channels are OPERABLE or in trip, such that both trip systems will generate a trip signal from the given Function on a valid signal. "For Function 1.d, this would require both trip systems to have one channel associated with each MSL, OPERABLE or in trip." Explain how a single channel operable in both trip systems associated with each MSL will preserve the ability to detect differential pressure across a MSL flow orifice.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.6.1-05 JFD 7

CTS Table 4.2.A-1, Functions 5.c, 6.c

ITS Table 3.3.6.1-1, Functions 3.e, 4.d

CTS HPCI and RCIC isolations are referred to as "Area Temperature" functions. The ITS proposal is to adopt new nomenclature which specify "Turbine Area Temperature" functions. It appears that pipe room area temperature monitors may be omitted with the newly defined area. Provide a DOC for the nomenclature change. Show which sensors are included to meet current TS SR. Identify the sensors by the room or plant area in which they are located.

ComED Response:

3.3.6.1-06 No DOC

Compare ITS Required Action I.2 to Dresden, reference to the Residual Heat Removal System is not in the Dresden spec.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.6.2, Secondary Containment Isolation Instrumentation

3.3.6.2-01 JFD 3

ITS 3.3.6.2, Actions A and B, SR Table Note 2

Proposed changes delete the reference to secondary containment. Show that this deviation from the STS, Rev. 1 is included in an approved TSTF.. Revise the ITS to include the approved version of the STS actions.

ComED Response:

3.3.6.3, Relief Valve Instrumentation

3.3.6.3-01 JFD 1

ITS 3.3.6.3, Table 3.3.6.3-1, Functions 1.a, 2.a

The STS provides both open and close setpoints for the relief and low set relief valves. The CTSs provides only open setpoints. The lack of close setpoints has been carried over to the ITS. Both the open and close setpoints of the relief valves are important to safety function. Thus both settings should be addressed in the ITS. Add Allowable Values for the valve close setpoints to Table 3.3.6 3-1.

ComED Response:

3.3.7.1, CREV Instrumentation

No RAI

3.3.7.2, Mechanical Vacuum Pump

3.3.7.2-01 DOC A.7

CTS 4.2.L.3

CTS 4.2.L.3 note a to CHANNEL CALIBRATION requirements requires an instrument channel alignment every three months using a current source. The note a requirements are relocated but not evaluated by either an LA-DOC or an L-DOC. Provide a discussion of change for CTS change.

ComED Response:

3.3.8.1, LOP Instrumentation

3.3.8.1-01 JFD 2

CTS Table 3.2.B-1, Functions 6.b, degraded voltage

ITS Table3.3.8.1-1, Function 2.a, degraded voltage

Add upper limit values for the Table 3.3.8.1-1 Degraded Voltage Function which are omitted from the retyped ITS.

ComED response:

3.3.8.2, RPS-EPM Instrumentation

3.3.8.2-01 -Not Used

REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.3
LASALLE

General RAIs

3.3.x.x-01 No DOC

ITS LA.x DOCs as applicable

Some LA.x DOCs contain the phrase “that are not directly related to the OPERABILITY of the instrumentation” in discussion of the relationship between the trip setpoint and TS requirements for channels to be operable. Revise all LA.x DOCs to delete the phrase “that are not directly related to the OPERABILITY of the instrumentation” to provide an acceptable statement regarding the relationship between the trip setpoint and TS requirements for channels to be operable.

ComED Response:

3.3.1.1, Reactor Protection System Instrumentation

3.3.1.1-01 No DOC

CTS Table 3.3.1-1, Functions 9 & 10

ITS Table 3.3.1.1-1, same functions

CTS Table 3.3.1.1-1, Function 9 - Turbine Stop Valve-Closure, and Function 10- Turbine Control Valve Fast Closure, Valve Trip System Oil Pressure - Low shows applicable operational conditions to be Mode 1. The corresponding functions in ITS Table 3.3.1.1-1 shows the applicable modes to be >25% with no DOC explaining the conversion.

ComED Response:

3.3.1.1-02 DOC A.3, JFD8

CTS Table 4.3.1.3, Note (d)

ITS SR 3.3.1.1.17

SR 3.3.1.1.17, Note 4 as proposed may lead to misinterpretation because the RT limit is not specified. The referenced NRC letter is an inspection report. Find another way to establish a specific limit switch response time of 10 ms than the SR Bases. The staff suggests including the value in the SR, similar to calibration allowable values.

ComED Response:

3.3.1.1-03 DOC A.6

CTS Table 3.3.1-1, Scram Discharge Volume Water Level, high

ITS Table 3.3.1.1-1, same function

DOC A.6 describes this function as having been divided into two separate types, each with two channels per trip system. The CTS markups, shown in Table 3.3.1-1 however, suggest that the proposed change is from 2 to 4 channels per trip system. Clarify which change is correct.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.1.1-04 DOC A.8

CTS Table 3.3.1-1, Actions 3 and 9

ITS Required Action H.1

Based on the content and language of DOC A.8, the proposed translation of CTS action requirement into ITS are not administrative changes; but they are acceptable. One non-administrative change results from a difference in reporting requirements if the action is not

completed (a difference in the 50.72 notification reports). Additionally, the time to complete the required action is more restrictive because time is reduced from within one hour to complete the actions to a requirement to immediately initiate action to perform the action. Revise the DOCs for the proposed changes.
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.1.1-05 DOC A.9
CTS Table 4.3.1-1, Functions 1.a and 2.a
DOC L.5 and A.9 both "delete" a current Channel Functional Test SR noted in Table 4.3.1.1-1 as "S/U(c)." The SR requires testing "within 24 hours prior to startup if not performed within the previous 7 days." Both DOCs state that the CTS SR are redundant TS that require the SR to be performed in the applicable modes and to be current prior to entering the mode. The A.9 requirement is a deletion and should be discussed in the context of L.5.
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.1.1-06 DOC M.1
CTS 4.3.1.1-1, footnote *
ITS SR 3.3.1.1-1
Explain which function in Table 4.3.1.1-1 contains the * note to CHANNEL CHECK that is referenced in this DOC.
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.1.1-07 DOC L.11
CTS Table 3.3.2-2
ITS SR 3.3.1.1.17
Elimination of RPS response time test from the CTS because it is not credited in the plant safety analysis must be reviewed and accepted by the staff before TS changes can be made.
ComED Response:

3.3.1.1-08 JFD 1
CTS Table 4.3.1.1-1, Note (d)
ITS Actions Note 2 and JFD 1 to ITS SR 3.3.1.1.2. {{Dresden/Quad DOC L.7}}
The allowance for APRM channel gain adjustments provided in STS SR 3.3.1.1.2, Note 2 permits the adjustment per LCO 3.2.4, "APRM Gain and Setpoints." The proposed change is to include the gain adjustment as Note 2 to the LCO Actions. This change proposes to maintain the CTS allowance giving 2 and 12 hour times to adjust neutron monitoring channels. The staff notes that a CTS change results when proposed Actions Note 2 is applied to the ITS 6 hour topical report surveillance test interval allowed outage time. The resulting CTS change is that LCO Actions Note 2 gives 8 and 20 hours to adjust channels to conform to the calorimetric. This is a deviation from the STS that is not evaluated in JFD 1. This deviation is generic and requires an approved TSTF before inclusion in the ITS. Revise SR 3.3.1.1.2, Note 2 to include the bracket SR requirements. Revise the 3.3.1.1 DOCs as necessary.
ComED Response:

3.3.1.1-09 JFD 6
ITS SR 3.3.1.1.6
Document current practice showing that SRMs are partially withdrawn prior to verifying overlap.
ComED Response:

3.3.1.2, SRM Instrumentation

3.3.1.2-01 DOC M.4
CTS 3.9.2
ITS SR 3.3.1.2.4

Three items to evaluate. First, explain how CTS 3.9.2 relates to the proposed M-DOC change if the ITS SR "encompasses the allowances specified in CTS 3.9.2 Applicability." Second, explain how the discussion about ITS SR 3.3.1.2.4 justifies that the proposed CTS changes result in additional limits to plant operations. Also, note that Dresden and Quad DOCs reference the SRM position requirements specified in SR 3.3.1.2.2 but LaSalle does not. Resolve the differences.

ComED Response:

3.3.1.2-02 DOC LA.4
CTS 3.9.2
ITS SR 3.3.1.2.4

This CTS requirement appears to be a LaSalle unique operational limit that should be included in Table 3.3.1.2-1, Note c for special moveable detector.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.2.1, Control Rod Block Instrumentation

3.3.2.1-01, DOC L.2
CTS 3.1.4.1, Action c
ITS Required Action C.2.1.1

Proposed Required Action C.2.1.1 will permit a startup to continue if the RWM becomes inoperable after at least 12 rods are withdrawn, and not count this as the one startup with the RWM inoperable. The DOC justification states that this change, like proposed Required Action C.2.1.2, is an acceptable method for ensuring that the reliability of the RWM is maintained and that reactor startup with the RWM inoperable is not routinely made. Provide a safety basis justification in the proposed CTS changes.

ComED Response:

3.3.2.1-02, DOC L.2
CTS 3.1.4.1, Action c
ITS Required Action & C.2.1.2

As stated in this DOC the allowance to startup with the RWM inoperable was not provided in CTS. The ITS proposed Required Action C.2.1.2 allows one reactor startup to commence per calender year with the RWM inoperable. Provide the amendment 17 citation as verification/confirmation which accepted this provision as part of the approval to adopt NEDC-24011-P-A.

ComED Response:

3.3.2.1-03 DOC L.3
CTS 3.1.4.1, Action b.2

DOC L.3 states that elimination of the CTS 3.1.4.1 Action b.2 requirement to have no more than 3 inoperable control rods in any RWM group is considered to be acceptable based on the analyses in NEDO-21231, "Banked Position Withdrawal Sequence." Provide a citation to show the NEDO allowance and the staff acceptance of this allowance for LaSalle.

ComED Response:

3.3.2.2, FW/MTT Instrumentation

No RAIs

3.3.3.1, PAM Instrumentation

3.3.3.1-01, DOC LA.2

CTS Table 3.3.7.5-1, Action 81

CTS requirements to "use alternate methods of monitoring" cannot, as stated in DOC LA.2, be relocated to the Bases because the Bases cannot contain TS requirements. Additionally, the ITS specify a repair time followed by a report requirement in Administrative Controls. Revise DOC LA.2.

ComED Response:

3.3.3.1-02 - Not Used

3.3.3.1-03, DOC L.5

CTS Table 3.3.7.5-1, Action 81

This DOC incorrectly discusses ITS requirements following attempts to repair inoperable channels. The ITS does not specify initiating preplanned alternate methods, as stated. Instead the ITS specifies required actions to comply with ITS 5.6.6. Provide a revised DOC which addressed the proposed less restrictive changes that result from the deletion of the CTS 72 hour limit to initiate preplanned alternate methods.

ComED Response:

3.3.3.2, Remote Shutdown Instrumentation

3.3.3.2-01 DOC LA.1

CTS Table 4.3.7.4-1

Revise the LCO to adopt only the changes approved by TSTF-266, R.3 which requires placing CTS Table 4.3.7.4-1 details relating to system design and operation (i.e., the specific instrument listings) in the TS Bases.

ComED Response:

3.3.3.2-02 DOC L.2

CTS 4.3.7.4-1

The proposed ITS surveillance test allowed outage time was not included in TSTF-266, R.3. Revise the LCO to adopt only the changes approved by TSTF-266, R.3.

ComED Response:

3.3.3.2-03 - Not Used

3.3.3.2-04 JFD 4

ITS 3.3.3.2

UFSAR Section 7.4.4, "Shutdown Outside the Control Room," states that the LaSalle licensing basis requires shutting down the reactor from outside the main control room and bringing the reactor to cold shutdown conditions in an orderly manner, in compliance with General Design Criterion 19 of 10 CFR 50, Appendix A. General Functional Requirements Conformance, Section 7.4.4.4 confirms GDC 19, capability is provided by design. Section 7.4.4.3.e, "Procedure for Reactor Shutdown from Outside the Control Room," requires "the operator then uses transfer switches to transfer control to the remote shutdown panel."

The staff position is that the transfer switches are required to be operable to meet the current licensing basis to provide a GDC 19 capability and that the title of LCO 3.3.3.2 should be "Remote Shutdown System," not "Remote Monitoring System." Revise the ITS LCO 3.3.3.2 title and include surveillance requirements for transfer switches and make conforming changes to the LCO 3.3.3.2 Bases.

ComED Response:

3.3.4.1, EOC-RPT Instrumentation

3.3.4.1-01 DOC A.7 JFD 5

ITS SR 3.3.4.1.5 Note 2

Proposed SR 3.3.4.1.5 Note 2, states the limit switch response time (RT) may be conservatively assumed and the Bases for this SR note state the value is to be assumed as 10 ms. The CTS specify a RT test but do not specify a 10 ms limit switch response time. Effectively, this proposal places the LCO response time limit for the Turbine Stop Valve limit switch under licensee control in the Bases. This format is not consistent with 10 CFR 50.36 which requires operational limits to be established by TS. Additionally, using the 10 ms limit switch response time together with the ITS SR 3.3.4.1.5 note 1 allowance to use the most recent breaker arc suppression time perform by SR 3.3.4.1.6 (which is a once per 60-month test) it appears the combined effect of these changes on STS is to replace the 24-month RT test for the Turbine Stop Valve Closure function of the EOC-RPT with a 60 month frequency. If the staff accepts the 10ms response time then a separate SE and not a referenced NRC letter from an inspection report is need to change a TS requirement. In order to evaluate the proposed ITS SR 3.3.4.1.5 Note 2 allowance the staff requires justification regarding instrument reliability similar to the documentation provided for the RT topical report NEDO-32291-A which eliminated selected instrument sensor and loop response times.

ComED Response:

3.3.4.1-02 DOC LB.1

CTS 3.3.4.2, Actions b and c.1

ITS Action A

Provide a citation from GENE-770-06-1-A for the proposed 72 hour allowed outage time.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.4.1-03, JFD 6 (Bases)

ITS SR 3.3.4.1.4

Bases added to LCO and SR 3.3.4.1.4 (STS SR 3.3.4.1.5) regarding operability of the EOC-RPT and the status of the turbine bypass valves. Provide the TSTF reference.

ComED Response:

3.3.4.2, ATWS-RPT Instrumentation

3.3.4.2-01 DOC LB.1

CTS 3.3.4.1, Action b and c.1

ITS 3.3.4.2, Action A.2

Provide a citation from GENE-770-06-A for the proposed 14 day allowed outage time.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.4.2-02 DOC L.2 a)

Explain in a) above that the ITS represents a loss of trip function redundancy condition.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.4.2-03 DOC L.2 c)
Beginning with the sentence, “In addition, when one channel...” provide a comparison to ITS requirements to explain the proposed less restrictive changes.
ComED Response:

3.3.4.2-04 DOC L.2 d)
Isn’t d) an A-DOC?
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.5.1, ECCS Instrumentation

3.3.5.1-01 No DOC
CTS Table 3.3.3-1, LPCS and LPCI A Injection Valve Injection Line Press-Low
ITS Table 3.3.5.1-1, Table 3.3.5.1-1, Function 1.g
CTS Table 3.3.3-1 shows Action 32 for function LPCS and LPCI A Injection Valve Injection Line Pressure-Low, but this Action does not correspond to ITS Table 3.3.5.1-1for the same function. Verify if Action D showed in Table 3.3.5.1-1, Function 1.g is the same as Action 32 in CTS Table 3.3.3-1, LPCS and LPCI A Injection Valve Injection Line Pressure-Low.
ComED Response:

3.3.5.1-02 No DOC
CTS Table 3.3.3-1, Function A.2.a and A.2.b, Note b
ITS Table 3.3.5.1-1, Functions 4(a) and 4(b); similarly Functions 5(a) and 5(b)
CTS Table 3.3.3-1 Functions B.2.a and B.2.b Reactor Vessel Water Level, Level 1, and Drywell Pressure- High, respectfully requires the initiation of diesel generator for trip. This requirement is not carried thru to ITS 3.3.5.1-1, Functions 4(a) and 4(b), and to Functions 5(a) and 5(b). Verify if Note b (the initiation of diesel generator) is needed for these two functions. Revise DOCs accordingly.
ComED Response:

3.3.5.1-03 DOC M.2
CTS Table 3.3.3-1
ITS 3.3.5.1, Actions
This DOC needs some revision in order to understand the proposed technical position. See the redline inserts given in { } below for identified concerns:

CTS Table 3.3.3-1 Actions 31, 32, and 38 {Action 35 is discussed below but not here. Actions 32 and 38 are not discussed below to explain how this DOC applies to them.} specify actions to be taken when channels are inoperable. The actions are on a Trip Function basis. This allows multiple channels to be inoperable for up to 24 hours with the safety function of the ECCS instrumentation not maintained {what is the source of the position that a loss of function for 24 hours is acceptable?} (e.g., Action 31 allows all ECCS pumps minimum flow valve channels to be inoperable {the statement that Action 31 allows <u>all</u> ECCS pump minimum flow channels to be inoperable is contradicted by the Action 31 wording that addresses the singular case when the action remedial requirements are discussed} for up to 7 days). CTS Table 3.3.3-1 Action 35.a allows one or two channels of HPCS Reactor Vessel Water Level or Drywell Pressure channels (Functions C.1.a and C.1.b, respectively) in one trip system to be inoperable for 24 hours without declaring the system inoperable. With both channels inoperable in the same trip system, HPCS initiation capability is lost. Appropriate Required Actions have been added in ITS 3.3.5.1 Required Actions B.2, C.1, D.1, E.1, and F.1 for response to loss of the initiation capability of certain Functions for both divisions/trip systems.

ComED Response:

3.3.5.1-04 DOC LB.2
CTS 3.3.3-1,Action 38b
ITS 3.3.5.1
Review of the SE approving use of topical report NEDC-30936-P-A at LaSalle shows that the CTS Table 3.3.3-1 ACTION 38.b was not changed to incorporate a 24 hour AOT before that remedial actions are required to be completed. Revise DOC LB.2 and any related DOCs to address the current license basis use of the topical report.
ComED Response:

3.3.5.1-05 - Not Used

3.3.5.1-06 DOC L.3
ITS 3.3.5.1
Revise DOC L.3 to provide a clear safety basis justification, i.e., "because..." Clarify the 1st, 3rd and 4th paragraphs for this L-DOC found on page 14. These discussions contain what appear to be more restrictive changes and interpretations regarding ACTIONS including loss of function for up to 24 hours.
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.5.1-07 DOC L.5
CTS 4.4.2.2
ITS - not provided
The ITS proposed to delete all TS surveillance requirements pertaining to Safety Relief Valve Low-Low Setpoint Relief instrumentation. UFSAR Section 5.2.2.4.1 specifies the low-low setpoint relief function to consist of safety grade logic required to function during the decay-heat-dominant period late in an isolation transient. Additionally, the BWR STS retain the LLS instrumentation as LCO 3.3.6.3, based on this instrumentation meeting Criterion 3, of 10 CFR 50.36. As such, the staff believes the proposed LSCS technical specifications limiting conditions for operation do not comply with regulations. Provide a low-low set LCO modeled after STS NUREG-1433.
ComED Response:

3.3.5.1-08 DOC L.6
This DOC also applies to permissives for HPCS and LPCI pumps. Revise the discussion to include <u>all</u> types of functions that the DOC applies to.
ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.5.1-09 JFD 1
ITS Table 3.3.5.1-1, Functions 1.d and 2.d
The JFD discussion above for Modes 1, 2, and 3 which states that the CTS allows 24 hours to restore a channel to OPERABLE status, when both channels are inoperable does not reflect the current licensing basis as stated. The CTS allows only one hour to restore one of two inoperable channels. The one and two channel inoperable repair allowed outage time extensions approved by the staff in SER dated August 2, 1995 and referenced in this JFD extended only the time to restore one inoperable channel in CTS Action 38.a. Thus, contrary to this JFD, Action 38.b, for both channels inoperable, should remain a one hour action time to restore in the ITS. Revise proposed ITS to adopt the STS by including permissive functions and bypass functions in ITS Action C.

ComED Response:

3.3.5.1-10 JFD 2

ITS Table 3.3.5.1-1, Functions 1.g and 2.f

Revise proposed ITS to adopt the STS by including permissive functions and bypass functions in ITS. See the RAI 3.3.5.1-09 discussion for JFD 1, above.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.5.2, RCIC Instrumentation

No RAIs

3.3.6.1, Primary Containment Isolation Instrumentation

3.3.6.1-01 DOC JFD6

CTS 4.3.2.3

ITS N/A

Verify TSTF format is adopted.

ComED Response:

3.3.6.1-02 DOC A.7

CTS Table 3.3.2.2

The ITS Table retains a value of 169" H_2O. Clarify the DOC.

ComED Response:

3.3.6.1-03 LA.8

CTS Table 3.3.2-2, function 6.c RHR Pump Suction Flow-High

Deletion of CTS requirements require an evaluation of the change to determine the applicability of the Criteria in 10 CFR 50.36.

ComED Response:

3.3.6.1-04 DOC LB.1

CTS 3.3.2 Action b.1.a); Action c.2.a)1), Notes * and ***

ITS 3.3.6.1, Actions A and B

The CTS actions are deleted in the ITS. LB.1 does not clearly state the safety basis for making the proposed changes.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.6.1-05 DOC L.10

CTS Table 3.3.2-1, Function B.5 (Inboard Valves) & B.6 (Outboard Valves) Manual Initiation for Valve Groups 3, 8 & 9

The CTS Action 26 for inoperable manual initiation channels specifies a 24 hour restore time provided that the manual initiation function is operable for each other group valve, inboard or outboard, as applicable. It appears that the 24-hour CTS restoration time retained for other manual ITS functions is dependant on retaining the manual isolation valves proposed to be deleted (groups 3, 8 and 9). Provide justification to show that deletion of the CTS requirement for 1 channel per valve of valves in Groups 3, 8 and 9 the ITS requirements for manual valves, including the 8-hour restoration time, that remain establish a level of requirements for isolation equipment to be operable which provides adequate protection of public health and safety based on the LaSalle design.

ComED Response:

3.3.6.1-06 JFD 2

ITS SR 3.3.6.1.6 Bases

Insert 3.3.6.1.6.a adds an interpretation to the Bases that is not included in an approved TSTF. Revise the ITS to adopt the STS Bases.

ComED Response:

3.3.6.1-07 JFD 4

CTS Table 3.3.2-1, Function 3.b and 3.c for RWCU System isolation

CTS specifies 1 channel per trip system per heat exchanger to be operable. The ITS proposes 1 channel per trip system per Area to be operable. This change is neither identified nor justified. Revise the ITS to require 1 channel per trip system per heat exchanger.

ComED Response:

3.3.6.1-08 JFD 4

CTS Table 3.3.2-1, Func.B (Manual) Min. Operable Channels Per Trip System

ITS Table 3.3.6.1-1, Functions 1.f, 2.g, 3.j, 4.m, 5.c

Each inboard and outboard Manual trip function in the CTS specifies the valve groups operated by the trip function signal and the minimum number of operable channels per trip system. For Manual Functions, the minimum operable channels is specified as "1 per group." The ITS format presents the manual isolation requirements as 2 channels per trip system for each trip system which isolates a safety system. For example, CTS functions B.1(inboard) and B.2 (outboard) each specify 5 valve groups are operated by the isolation signal and that 1 channel per group per trip system is required to be operable (a total of 20 channels). The ITS translates this requirement as requiring 4 safety systems to be isolated with 2 channels per trip system per safety system (a total of 16 channels) with no inboard/outboard designation. It appears the ITS include fewer channels to be operable than do the CTS. Provide additional discussion showing that the proposed ITS requires the same number and type of channels for CTS functions B.1, B.2, B.3, B.4 and B.7.

ComED Response:

3.3.6.1-09 JFD 11

CTS Table 3.3.2-1, Note (i) , CTS SR 4.6.5.1.c

ITS SR 3.6.4.1.3 and SR 3.6.4.1.4

CTS Table 3.3.2-1, Note (i) allows both channels of each trip system to be in an "inoperable status" to do specified work on instrument channels for up to 4 hours without placing the trip system in the trip condition. This note also prohibits using the note allowances if Surveillance testing required by CTS SR 4.6.5.1.c is being performed.

CTS Table 3.3.2-1, Note (j) allows both channels of each trip system to be in an "inoperable status" to do specified Surveillance testing required by CTS SR 4.6.5.1.c or if reactor building ventilation is lost for up to 12 hours without placing the trip system in the trip condition. Provide additional justification to show that the allowances of Notes (i) and (j) are unchanged in ITS ACTIONS Notes 2 and 3, respectfully. The Bases appear to be inconsistent with the ACTIONS Notes. Cross references have been eliminated in the STS. Explain the need for referencing Chapter 3.6 SRs in LCO 3.3.6.1.

ComED Response:

3.3.6.2, Secondary Containment Isolation Instrumentation

3.3.6.2-01 DOC LB.1

CTS 3.3.2 Action b.1.a); Action c.2.a)1), Notes * and ***
ITS 3.3.6.2, Actions A and B

The CTS actions are deleted in the ITS. LB.1 does not clearly state the safety basis for making the proposed changes.

ComED Response: No response required. Item resolved during 07/18/2000 conference call.

3.3.6.2-02 JFD 1
ITS 3.3.6.2, Actions A and B, SR Table Note 2

Proposed changes delete the reference to secondary containment. Show that this deviation from the STS, Rev. 1 is included in an approved TSTF. Revise the ITS to include the approved version of the STS actions.

ComED Response:

3.3.x.x, Low Low Set Instrumentation

see 3.3.5.1-07, DOC L.5

3.3.7.1, Control Room Area Filtration Instrumentation

3.3.7.1-01 DOC LB.1
CTS Table 3.3.7.1-1, Action 70.a
ITS 3.3.7.1, Action A.1

Provide a GENE-770 or NEDC-31677 citation (page #) or SE citation (page #) for extending the CTS action to trip an inoperable channel to 6 hours from 1 hour. Also, CTS Action 70 is written on a per trip system basis for each inoperable channel with Action 70.a applying to one inoperable channel per trip system and Action 70.b applying to two inoperable channels per trip system. There are 4 trip systems (2 per train with a 2/2 logic for each trip system). In the IT'S THE actions are based on an out-of-service time for each channel. This change is less restrictive and is not evaluated in the L-DOCs. Provide a DOC for this issue.

ComED Response:

3.3.8.1, LOP Instrumentation

3.3.8.1-01 ITS Table 3.3.8.1-1, Function 1.a

Two sets of unlabeled Allowable Value voltage limits are included in the ITS table for Function 1.a. The limits apply to Division I and Division II, respectfully. Revise the table presentation of the voltage values by labeling them as Division I and Division II.

ComED Response:

3.3.8.2, RPS EPA Instrumentation

No RAIs

REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.7
DRESDEN, QUAD CITIES AND LASALLE

Note: There are no comments for the following specifications:

Dresden	3.7.1, Containment Cooling Service Water (CCSW) System
Quad Cities	3.7.1, Residual Heat Removal Service Water (RHRSW) System
LaSalle	3.7.1, Residual Heat Removal Service Water (RHRSW) System
Dresden	3.7.2, Diesel Generator Cooling Water (DGCS) System
Quad Cities	3.7.2, Diesel Generator Cooling Water (DGCS) System
all three	3.7.3, Ultimate Heat Sink (UHS)
all three	3.7.4, Control Room Emergency Ventilation (CREV) System
Dresden	3.7.5, Control Room Emergency Ventilation Air Conditioning (AC) System
Quad Cities	3.7.5, Control Room Emergency Ventilation Air Conditioning (AC) System
LaSalle	3.7.5, Control Room Area Ventilation Air Conditioning (AC) System
all three	3.7.7, Main Turbine Bypass System
Quad Cities	3.7.9, Safe Shutdown Makeup Pump (SSMP) System

General Comments

Dresden, Quad Cities, (and LaSalle)
3.7-01 DOC LA.1 for snubbers

CTS 3/4.8.F (3/4.7.9), Snubbers, is being relocated to the TRM. ComEd did not justify this relocation by comparing the LCO to each 10 CFR 50.36(c)(2)(ii) criteria. Previous ITS submittals have provided an analysis supporting each specification relocation by comparing the CTS requirements to the criteria. Snubbers have been relocated with an R-type DOC in previous submittals; e.g., Byron and Braidwood, McGuire and Catawba, and Vogtle. Comment: Provide the analysis comparing the listed specification to each screening criteria. Also, the submittals incorrectly treats the relocation of the snubber specifications as LA-type changes, and not as R-type changes, which is appropriate. Replace LA.1 with an R.1 DOC.

ComEd Response:

3.7.2, Diesel Generator Cooling Water (DGCS) System

LaSalle
3.7.2-03 ITS SR 3.7.2.2
STS SR 3.7.3.2

Dresden, Quad Cities,
and LaSalle

CTS 4.7.1.2.b
DOC L.1
JFD 2

CTS 4.7.1.2.b verifies each pump starts automatically when a start signal is received for the associated diesel and the Division I pump starts upon receipt of a start signal for unit LPCS pump. ITS SR 3.7.2.2 verifies that each required DGCS pump automatically starts on each required actual or simulated initiation signal. The ITS specifying that the signal can be “actual or simulated” is additional information not contained in the CTS. The Dresden and Quad Cities submittals did not add that the signal can be actual or simulated.

Comment: Provide additional information why adding “actual or simulated” is appropriate for LaSalle Station, or why not appropriate for Dresden and Quad Cities.

ComEd Response:

3.7.6, Main Condenser Offgas

Dresden
3.7.6-01 ITS 3.7.6 LCO, SR 3.7.6.1
STS 3.7.6 LCO, SR 3.7.6.1
CTS 3.8.I LCO and Action
DOC A.2
JFD 1

CTS 3.8.I limits the release rate of the sum of the activities of the noble gases measured prior to the offgas holdup line $\leq$ 100 μCi/sec/MWt, after 30 minutes delay. ITS 3.7.6 LCO limits the gross gamma activity rate of the noble gases measured to $\leq$ 252,700 μCi/second. DOC A.2 indicates the unit THERMAL POWER is 2527 MWt, so multiplying the value provided in CTS 3.8.I times the THERMAL POWER results in a limit of 252,700 uCi/second. The CTS units of μCi/sec/MWt imply that the limit is based on the THERMAL POWER level. If this is true the limit becomes more restrictive at lower power levels. If the CTS value is power dependent, then the ITS limit is equivalent to the CTS limit at 100% power but is less restrictive for power less than 100%.

Comment: Provide additional information if the CTS limit is power dependent. If the limit is power dependent provide documentation for a less restrictive change.

ComEd Response:

Quad Cities
3.7.6-02 ITS 3.7.6 LCO, SR 3.7.6.1
STS 3.7.6 LCO, SR 3.7.6.1
CTS 3.8.I LCO and Action
DOC A.2
JFD 1

CTS 3.8.I limits the release rate of the sum of the activities of the noble gases measured prior to the offgas holdup line $\leq$ 100 μCi/sec/MWt, after 30 minutes delay. ITS 3.7.6 LCO limits the

gross gamma activity rate of the noble gases measured to ≤ 251,100 μCi/second. DOC A.2 indicates the unit THERMAL POWER is 2511 MWt, so multiplying the value provided in CTS 3.8.I times the THERMAL POWER results in a limit of 251,100 uCi/second. The units of μCi/sec/MWt imply that the limit is based on the THERMAL POWER level. If this is true then limit becomes more restrictive at lower power levels. If the CTS value is power dependent, then the ITS limit is equivalent to the CTS limit at 100% power but is less restrictive for power less than 100%.

Comment: Provide additional information about whether the CTS limit is power dependent. If the limit is power dependent provide documentation for a less restrictive change.

ComEd Response:

LaSalle
3.7.6-03 ITS LCO 3.7.6 and SR 3.7.6.1
STS LCO 3.7.5 and SR 3.7.5.1 (NUREG 1434, Rev. 1)
CTS 3.11.2.2 and 4.11.2.2.2
DOC A.2
JFD 2

CTS 3.11.2.2 limits the release rate of the sum of the activities from the noble gases measured prior to the holdup line to less than or equal to 3.4 x 10^5 microcuries/second. ITS LCO 3.7.6 requires that the gross gamma activities rate of the noble gases measured prior to the holdup line shall be ≤ 340,000 μCi/second after decay of 30 minutes. The phrase “after decay of 30 minutes” is bracketed information in the STS. DOC A.2 states the UFSAR safety analysis is that CTS radioactivity release rate is based on also assumes the radioactivity rate is after a 30 minute decay period. The CTS is not clear if the release rate limit is based on a 30 minute decay or not.

CTS 4.11.2.2.2 requires the release rate of the sum of the activities from noble gases prior to the holdup line shall be determined to be within the limits of Specification 3.11.2.2 at the following frequencies by performing an isotopic analysis of a representative sample of gases taken prior to the holdup line. ITS SR 3.7.6.1 verifies the gross gamma activities rate of the noble gases is ≤ 340,000 μCi/second after decay of 30 minutes. ITS SR 3.7.6.1 appears less restrictive than CTS 4.11.2.2.2 because it allows for 30 minute decay.

DOC A.2 justifies the change as administrative because the UFSAR assumes the radioactivity rate is after a 30 minute delay. While the UFSAR can justify the change, it does not provide adequate bases for the change to be administrative.

Comment: Provide change justification based on whether the change is less or more restrictive.

ComEd Response:

3.7.8, Spent Fuel Storage Water Level

Dresden and Quad Cities (and LaSalle)
3.7.8-01 ITS 3.7.8 Applicability
STS 3.7.8 (3.7.7)Applicability

Dresden, Quad Cities
LaSalle

CTS 3.10.H (3.9.9) Applicability
DOC A.2
JFD 2

CTS 3.10.H Applicability is whenever irradiated fuel assemblies are in the spent fuel storage pool. STS 3.7.8 (3.7.7) Applicability is during movement of irradiated fuel assemblies in the spent fuel storage pool. ITS 3.7.8 adopts the STS Applicability but adds the "During movement of new fuel assemblies in the spent fuel storage pool with irradiated fuel assemblies seated in the spent fuel storage pool." DOC A.2 appears to provides adequate technical justification for the change, but the ITS is less restrictive on plant operations than the CTS because movement is required. Therefore, the change should be justified as a less restrictive change instead of an administrative change. Note that the addition to the STS Applicability statement could apply to most facilities, and is thus generic.

Comment: Provide an L-DOC for the relaxation. Propose a generic change to the STS regarding all Applicability statements of "during movement of irradiated fuel assemblies."

ComEd Response: