



Mark E. Reddemann
Site Vice President

Point Beach Nuclear Plant
6610 Nuclear Road
Two Rivers, WI 54241

NPL 2000-0411

10 CFR 50.90

September 14, 2000

Document Control Desk
U.S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301
SUPPLEMENT 6 TO APPLICATION FOR AMENDMENT TO
FACILITY OPERATING LICENSE APPENDIX A:
TECHNICAL SPECIFICATIONS IMPROVEMENT PROJECT
RESPONSE TO RAI ON ITS SECTION 5.5 (TAC Nos. MA7186 and MA7187)
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On November 15, 1999, Wisconsin Electric Power Company (WE), then licensee for the Point Beach Nuclear Plant (PBNP), submitted an application to amend Appendix A, Technical Specifications, for Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Power Plant, Units 1 and 2, respectively (reference letter NPL 99-0669). The application proposed to convert the Point Beach Current Technical Specifications (CTS) to the Point Beach Improved Technical Specifications (ITS). That application contained documentation for ITS Chapters 1.0 and 2.0 and Sections 3.0 through 3.9.

Documentation for ITS Chapters 4.0 and 5.0 was enclosed with Supplement 1 to the PBNP ITS submittal dated March 15, 2000 (reference letter NPL 2000-0142).

In a letter dated August 17, 2000, the NRC issued a Request for Additional Information (RAI) to WE on ITS Section 5.5.

Attachment 1 of this letter includes the Nuclear Management Company (NMC) response to the Staff's questions in the above referenced RAIs. In some instances, the response includes changes that are required to the original submittal, including changes to the Current Technical Specification (CTS) markups, Descriptions of Change (DOC), NUREG markups, proposed ITS and associated Bases, Justifications for Deviation (JFD), and No Significant Hazard Considerations (NSHC). These changes are discussed in the response to each question and are included in the attachment. Pages containing the changes required to the DOC, JFD, and NSHC are identified by "Rev. B".

A001

The changes required to the CTS, NUREG, and ITS markups are identified as follows (example):



The revision bar identifies the section that has been revised; the B in the triangle identifies revision B; and the RAI number identifies which RAI question the revision relates to. The old pages in the original submittal should be replaced with the new pages enclosed with this letter, following the instructions of attachment 2.

Additional changes to the conversion package for the subject ITS Sections have been identified as a result of ITS reviews by NMC staff and Amendment approvals that have occurred after the original ITS submittal. These additional changes have been included (where necessary) in response to each RAI question for completeness and are clearly identified in the new pages enclosed with this letter.

NMC has determined that this supplement does not involve a significant hazards consideration, authorize a significant change in the types or total amounts of effluent release, or result in any significant increase in individual or cumulative occupational radiation exposure. Therefore, NMC concludes that the proposed supplement meets the categorical exclusion requirements of 10 CFR 51.22(c)(9) and that an environmental impact appraisal need not be prepared.

NMC is notifying the State of Wisconsin of this supplement by transmitting a copy of this letter, and its attachments, to the Public Service Commission of Wisconsin.

Other supplements to the PBNP ITS submittal, in response to previous RAIs, are listed for reference:

- Supplement 2 dated June 15, 2000 (ITS section 2.0, 3.1, 3.2, 3.5; reference letter NPL 00-0260).
- Supplement 3 dated June 19, 2000 (ITS section 3.6; reference letter NPL 00-0271).
- Supplement 4 dated July 28, 2000 (ITS section 3.8; reference letter NPL 00-0341).
- Supplement 5 dated August 17, 2000 (ITS sections 3.4 and 3.9; reference letter NPL 00-0371).

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects, these statements are not based entirely on my personal knowledge, but on information furnished by cognizant NMC employees, contractor employees, and/or consultants. Such information has been reviewed in accordance with company practice, and I believe it to be reliable.

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September 14, 2000
Page 3

Should you have any questions on this submittal or require additional information, please contact me.

Sincerely,



Mark Reddemann
Site Vice President
Point Beach Nuclear Plant

Subscribed to and sworn before me
on this 14th day of September, 2000

Clara K. Pohl Christine K. Poroski
Notary Public, State of Wisconsin

My Commission expires on 8-25-2002.

JG/tat

Attachments

Enclosure

cc: NRC Regional Administrator
NRC Resident Inspector
NRC Project Manager
PSCW

DOCKETS 50-266 AND 50-301
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
TECHNICAL SPECIFICATIONS IMPROVEMENT PROJECT SECTION 5.5
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

The following information is provided in response to the Nuclear Regulatory Commission staff's requests for additional information dated August 17, 2000.

Each question is restated on the following pages with NMC's response following.

NRC Question #1:

There is a discrepancy between the Section 5.5 mark-up and the proposed final draft. The mark-up references ASME N510-1989 and the final draft references ASME N510-1980. Which version will be used for the final draft? If exceptions are taken, explicitly state those sections.

Response:

Corrections have been made to ITS Specification 5.5.10 to indicate the Control Room Emergency Filtration System will be tested in accordance with the methodology of ANSI N510-1980, Sections 10, 12 and 13, excluding subsections 10.3 and 12.3, as applicable. Discrepancies between the markups and the proposed final draft have also been resolved.

NRC Question #2:

The Section 5.5 mark-up says, "the applicable portions of Regulatory Guide 1.52, Revision 2." This vague terminology is unacceptable. However, the Section 5.5.10 final draft does not contain this vague terminology. Does the final version have exceptions to Regulatory Guide 1.52 or the ASME or ASTM codes? If so, explicitly state those exception sections.

Response:

Corrections have been made to ITS Specification 5.5.10 to indicate the Control Room Emergency Filtration System will be tested at the frequencies specified in Regulatory Guide 1.52, Revision 2, and in accordance with ASTM D3803-1989 and the methodology of ANSI N510-1980, Sections 10, 12 and 13, excluding subsections 10.3 and 12.3, as applicable. Discrepancies between the markups and the proposed final draft have also been resolved.

NRC Question #3:

The proposed final draft Section 5.5.10, first paragraph, should add the "ASTM D3803-1989" at the end of the sentence for consistency. Will this be added?

Response:

ITS Specification 5.5.10 has been revised to indicate the Control Room Emergency Filtration System will be tested in accordance with ASTM D3803-1989.

NRC Question #4:

The proposed final draft Section 5.5.10.c should remove the " \leq " before 30 degrees Centigrade and remove "greater than or equal to" before relative humidity for consistency. Will these be removed?

Response:

CTS 15.4.11.4.d establishes the conditions under which the charcoal adsorbent laboratory sample analysis shall be performed. Included in the conditions of the laboratory analysis are minimum values of relative humidity (95%) and temperature (30°C). The Basis of CTS 15.4.11.4.d states, "The charcoal adsorbent laboratory sample analysis is performed in accordance with ASTM D3803-1989. . ."

The proposed final draft Section 5.5.10.c has been revised to more closely reflect the requirements of ASTM D3803-1989. The inequalities preceding the temperature and relative humidity values have been deleted and the phrase, "applying the tolerances of ASTM D3803-1989" has been added to the end of the last sentence.

Justification for moving the tolerances from the Technical Specifications to ASTM D3803-1989 is discussed in DOC LA.6. Justification for deviating from NUREG-1431 is discussed in JFD 18.

**ATTACHMENT 2
DISCARD AND INSERTION INSTRUCTIONS**

VOLUME 11	
SECTION 5.5	
DISCARD	INSERT
DOC pages 1 through 18 of 18	DOC pages 1 through 17 of 17
CTS markup pages 4 of 41, 21 of 41, 22 of 41 and 37 of 41	CTS markup pages 4 of 41, 21 of 41, 22 of 41 and 37 of 41
JFD pages 4 through 7 of 7	JFD pages 4 through 7 of 7
ISTS markup pages 5.0-12, 5.0-13, and 5.0-14	ISTS markup pages 5.0-12, 5.0-13, and 5.0-14
ITS pages 5.5-12 and 5.5-13	ITS pages 5.5-12 and 5.5-13

ENCLOSURE

Description of Changes - NUREG-1431 Section 5.05

29-Aug-00

DOC Number	DOC Text																
A.01 Rev. A	<p>The information contained in CTS sections 15.3.9, 15.4.10, 15.7.3, 15.7.4, 15.7.5, 15.7.6 and 15.7.7 is not being retained in ITS. This information does not provide any regulatory requirements necessary to protect the public health and safety, but rather states that the requirements previously contained in the above CTS sections were relocated to the Radiological Effluents and Materials Control and Accountability Program Manual (REMCAP). Therefore, deletion of this information is administrative.</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; width: 50%;">CTS:</th> <th style="text-align: left; width: 50%;">ITS:</th> </tr> </thead> <tbody> <tr> <td>15.03.09</td> <td>N/A</td> </tr> <tr> <td>15.04.10</td> <td>N/A</td> </tr> <tr> <td>15.07.03</td> <td>N/A</td> </tr> <tr> <td>15.07.04</td> <td>N/A</td> </tr> <tr> <td>15.07.05</td> <td>N/A</td> </tr> <tr> <td>15.07.06</td> <td>N/A</td> </tr> <tr> <td>15.07.07</td> <td>N/A</td> </tr> </tbody> </table>	CTS:	ITS:	15.03.09	N/A	15.04.10	N/A	15.07.03	N/A	15.07.04	N/A	15.07.05	N/A	15.07.06	N/A	15.07.07	N/A
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15.03.09	N/A																
15.04.10	N/A																
15.07.03	N/A																
15.07.04	N/A																
15.07.05	N/A																
15.07.06	N/A																
15.07.07	N/A																
A.02 Rev. A	<p>The information contained in CTS 15.7 is not being retained in ITS. This information does not provide any regulatory requirements necessary to protect the public health and safety, but rather states that the RETS do not expand the responsibilities of the licensed operators, and the material contained therein will not be the subject of SRO/RO licensing examinations. Therefore, deletion of this information is administrative.</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; width: 50%;">CTS:</th> <th style="text-align: left; width: 50%;">ITS:</th> </tr> </thead> <tbody> <tr> <td>15.07</td> <td>N/A</td> </tr> </tbody> </table>	CTS:	ITS:	15.07	N/A												
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15.07	N/A																
A.03 Rev. A	<p>CTS 15.7.8.3.a is revised to reflect the format of the ISTS. The Environmental Manual (EM) will become the ODCM, which will contain the methodology and parameters used in the conduct of the radiological environmental monitoring program. The ODCM will also contain the radiological effluent controls and radiological environmental monitoring activities and descriptions of the information that should be included in the Annual Monitoring Report.</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; width: 50%;">CTS:</th> <th style="text-align: left; width: 50%;">ITS:</th> </tr> </thead> <tbody> <tr> <td>15.07.08.03.A</td> <td>SPEC 5.05.01.A</td> </tr> <tr> <td></td> <td>SPEC 5.05.01.B</td> </tr> </tbody> </table>	CTS:	ITS:	15.07.08.03.A	SPEC 5.05.01.A		SPEC 5.05.01.B										
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	SPEC 5.05.01.B																

Description of Changes - NUREG-1431 Section 5.05

29-Aug-00

DOC Number	DOC Text																																																																
A.04 Rev. A	In the conversion of Point Beach current Technical Specifications (CTS) to the proposed plant specific Improved Technical Specifications (ITS), certain wording preferences or conventions are adopted which do not result in technical changes (either actual or interpretational). Editorial changes, reformatting, and revised numbering are adopted to make the ITS consistent with the Standard Technical Specifications, Westinghouse Plants, NUREG-1431, Revision 1 (i.e., Improved Standard Technical Specifications (ISTS)).																																																																
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15.04.02.B.03.a	SPEC 5.05.07.d																																																																
15.04.11.04.a	SPEC 5.05.10.a																																																																

Description of Changes - NUREG-1431 Section 5.05

29-Aug-00

DOC Number	DOC Text
15.04.11.04.b	SPEC 5.05.10.a
15.04.11.04.d	SPEC 5.05.10.c
15.04.16 T 15.04.16-01 FOOTNOTE (a).01	SPEC 5.05.16.01
15.04.16 T 15.04.16-01 FOOTNOTE (a).02	SPEC 5.05.16.02
15.04.16 T 15.04.16-01 FOOTNOTE (a).03	SPEC 5.05.16.03
15.04.16 T 15.04.16-01 FOOTNOTE (a).04	SPEC 5.05.16.04
15.06.08.04.A.I	SPEC 5.05.03.A
15.06.08.04.A.II	SPEC 5.05.03.B
15.06.08.04.A.III	SPEC 5.05.03.C
15.06.12	SPEC 5.05.15
15.06.12.A	SPEC 5.05.15.A
15.06.12.B	SPEC 5.05.15.B
15.06.12.C	SPEC 5.05.15.C
15.06.12.D	SPEC 5.05.15.D
15.06.12.D.01	SPEC 5.05.15.D.01
15.06.12.D.02	SPEC 5.05.15.D.02
15.06.12.E	SPEC 5.05.15.E
15.06.12.F	SPEC 5.05.15.F
15.07.08.03.A	SPEC 5.05.01.B
15.07.08.03.B.02	SPEC 5.05.04.C
15.07.08.03.B.03	SPEC 5.05.04.B
15.07.08.03.B.04	SPEC 5.05.04.E
15.07.08.03.B.06	SPEC 5.05.04.G
15.07.08.03.B.06.a	SPEC 5.05.04.G
15.07.08.03.B.06.b	SPEC 5.05.04.G
15.07.08.03.B.06.c	SPEC 5.05.04.G
15.07.08.03.B.07	SPEC 5.05.04.I
15.07.08.03.B.08	SPEC 5.05.01.B
15.07.08.03.C	SPEC 5.05.01.A
	SPEC 5.05.04.D
15.07.08.07.B.01.a	SPEC 5.05.01.C.01.i
15.07.08.07.B.01.b	SPEC 5.05.01.C.01.ii
15.07.08.07.B.02	SPEC 5.05.01.C.02
BASES	SPEC 5.05.10.c
DPR-24 OL 3.I	SPEC 5.05.09
DPR-24 OL 3.I.01	SPEC 5.05.09.A
DPR-24 OL 3.I.02	SPEC 5.05.09.B

Description of Changes - NUREG-1431 Section 5.05

29-Aug-00

DOC Number	DOC Text								
A.07 Rev. A	<p>CTS 15.6.8.4.A is modified by foot note *, "Post-Accident Coolant Sampling and Post-Accident Containment Atmospheric Sampling Systems" and foot note **, "It is acceptable if the licensee maintains details of the program in plant operation manuals." These footnotes do not establish or relax any requirement and these details are not required in ITS to provide adequate protection of the public health and safety.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CTS:</td> <td style="width: 50%;">ITS:</td> </tr> <tr> <td>15.06.08.04.A</td> <td>SPEC 5.05.03</td> </tr> <tr> <td>15.06.08.04.A FOOT NOTE *</td> <td>N/A</td> </tr> <tr> <td>15.06.08.04.A FOOT NOTE **</td> <td>N/A</td> </tr> </table>	CTS:	ITS:	15.06.08.04.A	SPEC 5.05.03	15.06.08.04.A FOOT NOTE *	N/A	15.06.08.04.A FOOT NOTE **	N/A
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15.06.08.04.A	SPEC 5.05.03								
15.06.08.04.A FOOT NOTE *	N/A								
15.06.08.04.A FOOT NOTE **	N/A								
A.08 Rev. A	<p>CTS 15.4.16, Table 15.4.16-1, footnotes (a) and (b) are retained in ITS as the requirements of the RCS PIV Leakage Program. These footnotes are being preceded by a statement that the program shall be established to verify the leakage from each RCS PIV is within the limits specified, in accordance with the Event V Order, issued April 20, 1981. This statement does not impose any additional requirements, but rather provides information necessary to apply the specified limits to the RCS PIVs.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CTS:</td> <td style="width: 50%;">ITS:</td> </tr> <tr> <td>NEW</td> <td>SPEC 5.05.16</td> </tr> </table>	CTS:	ITS:	NEW	SPEC 5.05.16				
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NEW	SPEC 5.05.16								
A.09 Rev. A	<p>CTS 15.4.2.A.2(e) and associated footnote 1, and 15.4.2.A.5(a) Definitions for F* Distance and F* Tube and associated footnote 2, have not been retained in ITS. These items were applicable only to Westinghouse Model 44 steam generators in Unit 2. According to the footnotes, these requirements, definitions, and repair options are null and void following Unit 2 steam generator replacement. Due to the replacement of the Unit 2 steam generators, these requirements, definitions, and repair options are no longer required to be in the Technical Specifications, and are therefore deleted.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CTS:</td> <td style="width: 50%;">ITS:</td> </tr> <tr> <td>15.04.02.A.02.E</td> <td>N/A</td> </tr> <tr> <td>15.04.02.A.05.A</td> <td>N/A</td> </tr> <tr> <td>15.04.02.A.06</td> <td>SPEC 5.05.08.e</td> </tr> </table>	CTS:	ITS:	15.04.02.A.02.E	N/A	15.04.02.A.05.A	N/A	15.04.02.A.06	SPEC 5.05.08.e
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15.04.02.A.05.A	N/A								
15.04.02.A.06	SPEC 5.05.08.e								
A.10 Rev. A	<p>CTS 15.4.2.A.3 has been modified by replacing reference to CTS 15.4.2.B.1 with a reference to 10 CFR 50.55a(g). CTS 15.4.2.B.1 provided Inservice Inspection requirements, which have been removed from the Technical Specifications, because they are duplicative of the 10 CFR 50.55a(g) requirements.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CTS:</td> <td style="width: 50%;">ITS:</td> </tr> <tr> <td>15.04.02.A.03</td> <td>SPEC 5.05.08.c</td> </tr> </table>	CTS:	ITS:	15.04.02.A.03	SPEC 5.05.08.c				
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15.04.02.A.03	SPEC 5.05.08.c								

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DOC Number	DOC Text										
A.11 Rev. A	<p>CTS 15.3.12.2.a states the results of the in-place cold DOP and halogenated hydrocarbon tests on the HEPA and charcoal adsorber banks shall show a "minimum of 99% DOP removal and 99% halogenated hydrocarbon removal." CTS 15.3.12.2.b states the laboratory charcoal adsorbent tests shall show a "minimum of 99% removal of methyl iodide." The requirements of CTS 15.3.12.2.a have been changed to "penetration and system bypass \leq 1.0%." The requirement of CTS 15.3.12.2.b has been changed to "methyl iodide penetration \leq 1.0%." These revisions do not change the requirements, but rather restate the same requirement in different terms. Therefore, this change is administrative.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CTS:</td> <td style="width: 50%;">ITS:</td> </tr> <tr> <td>15.03.12.02.a</td> <td>SPEC 5.05.10.a</td> </tr> <tr> <td></td> <td>SPEC 5.05.10.b</td> </tr> <tr> <td>15.03.12.02.b</td> <td>SPEC 5.05.10.c</td> </tr> </table>	CTS:	ITS:	15.03.12.02.a	SPEC 5.05.10.a		SPEC 5.05.10.b	15.03.12.02.b	SPEC 5.05.10.c		
CTS:	ITS:										
15.03.12.02.a	SPEC 5.05.10.a										
	SPEC 5.05.10.b										
15.03.12.02.b	SPEC 5.05.10.c										
A.12 Rev. A	<p>CTS 15.4.2 and 15.7.5 provide introductory statements (Applicability / Objectives) which simply state which systems/components are addressed within each section and provide a brief summary of the purpose for each Section. This information does not establish any regulatory requirements for the systems and components addressed within this Section. Accordingly, deletion of this information does not alter any requirement set forth in the Technical Specifications. This change is administrative and consistent with the format and presentation for the ITS as provided in NUREG 1431.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CTS:</td> <td style="width: 50%;">ITS:</td> </tr> <tr> <td>15.04.02 APPL</td> <td>N/A</td> </tr> <tr> <td>15.04.02 OBJ</td> <td>N/A</td> </tr> <tr> <td>15.07.05 APPL</td> <td>N/A</td> </tr> <tr> <td>15.07.05 OBJ</td> <td>N/A</td> </tr> </table>	CTS:	ITS:	15.04.02 APPL	N/A	15.04.02 OBJ	N/A	15.07.05 APPL	N/A	15.07.05 OBJ	N/A
CTS:	ITS:										
15.04.02 APPL	N/A										
15.04.02 OBJ	N/A										
15.07.05 APPL	N/A										
15.07.05 OBJ	N/A										
A.13 Rev. A	<p>Editorial changes to CTS 15.4.6.A.6 have been made to clarify the diesel fuel oil testing program. The program will include sampling and testing requirements and acceptance criteria in accordance with applicable ASTM standards.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CTS:</td> <td style="width: 50%;">ITS:</td> </tr> <tr> <td>15.04.06.A.06</td> <td>SPEC 5.05.12</td> </tr> </table>	CTS:	ITS:	15.04.06.A.06	SPEC 5.05.12						
CTS:	ITS:										
15.04.06.A.06	SPEC 5.05.12										

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LA.01 Rev. A	<p>The information contained in CTS sections 15.7.1 is not being retained in ITS. This information does not provide any regulatory requirements necessary to protect the public health and safety, but provides definitions for frequently used terms in the RETS. The requirements of the RETS were removed from the CTS in Amendments 184/188 and placed in the Radiological Effluents and Materials Control and Accountability Program (REMCAP). In conjunction with the ITS project, the REMCAP is being reorganized to reflect the recommendations of GL 89-01, and will become the Offsite Dose Calculation Manual (ODCM). The information contained in CTS 15.7.1 will be moved to the ODCM. This information is not necessary to adequately describe the actual regulatory requirement and can be moved to other documents without impact on safety. Changes to the ODCM will be controlled by the ODCM process in Section 5 of the proposed ITS.</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; border-bottom: 1px dashed black;">CTS:</th> <th style="text-align: left; border-bottom: 1px dashed black;">ITS:</th> </tr> </thead> <tbody> <tr> <td style="border-bottom: 1px dashed black;">15.07.01.A</td> <td style="border-bottom: 1px dashed black;">ODCM</td> </tr> <tr> <td style="border-bottom: 1px dashed black;">15.07.01.B</td> <td style="border-bottom: 1px dashed black;">ODCM</td> </tr> <tr> <td style="border-bottom: 1px dashed black;">15.07.01.C</td> <td style="border-bottom: 1px dashed black;">ODCM</td> </tr> <tr> <td style="border-bottom: 1px dashed black;">15.07.01.D</td> <td style="border-bottom: 1px dashed black;">ODCM</td> </tr> </tbody> </table>	CTS:	ITS:	15.07.01.A	ODCM	15.07.01.B	ODCM	15.07.01.C	ODCM	15.07.01.D	ODCM						
CTS:	ITS:																
15.07.01.A	ODCM																
15.07.01.B	ODCM																
15.07.01.C	ODCM																
15.07.01.D	ODCM																
LA.02 Rev. A	<p>The information contained in CTS sections 15.7.8.3.a regarding an annual milk survey is not being retained in ITS. This information will be located in the ODCM. This information is not necessary to adequately protect the public and can be moved to other documents without impact on safety. Changes to the ODCM will be controlled by the ODCM process in Section 5 of the proposed ITS.</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; border-bottom: 1px dashed black;">CTS:</th> <th style="text-align: left; border-bottom: 1px dashed black;">ITS:</th> </tr> </thead> <tbody> <tr> <td style="border-bottom: 1px dashed black;">15.07.08.03.A</td> <td style="border-bottom: 1px dashed black;">N/A</td> </tr> </tbody> </table>	CTS:	ITS:	15.07.08.03.A	N/A												
CTS:	ITS:																
15.07.08.03.A	N/A																
LA.03 Rev. A	<p>The information contained in CTS 15.7.8.5 regarding major changes to radioactive liquid, gaseous and solid waste treatment systems is not being retained in ITS. This information will be located in the ODCM. This information is not necessary to adequately protect the public and can be moved to other documents without impact on safety. Changes to the ODCM will be controlled by the ODCM process in Section 5 of the proposed ITS.</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left; border-bottom: 1px dashed black;">CTS:</th> <th style="text-align: left; border-bottom: 1px dashed black;">ITS:</th> </tr> </thead> <tbody> <tr> <td style="border-bottom: 1px dashed black;">15.07.08.05</td> <td style="border-bottom: 1px dashed black;">N/A</td> </tr> <tr> <td style="border-bottom: 1px dashed black;">15.07.08.05.A</td> <td style="border-bottom: 1px dashed black;">N/A</td> </tr> <tr> <td style="border-bottom: 1px dashed black;">15.07.08.05.B</td> <td style="border-bottom: 1px dashed black;">N/A</td> </tr> <tr> <td style="border-bottom: 1px dashed black;">15.07.08.05.C</td> <td style="border-bottom: 1px dashed black;">N/A</td> </tr> <tr> <td style="border-bottom: 1px dashed black;">15.07.08.05.D</td> <td style="border-bottom: 1px dashed black;">N/A</td> </tr> <tr> <td style="border-bottom: 1px dashed black;">15.07.08.05.E</td> <td style="border-bottom: 1px dashed black;">N/A</td> </tr> <tr> <td style="border-bottom: 1px dashed black;">15.07.08.05.F</td> <td style="border-bottom: 1px dashed black;">N/A</td> </tr> </tbody> </table>	CTS:	ITS:	15.07.08.05	N/A	15.07.08.05.A	N/A	15.07.08.05.B	N/A	15.07.08.05.C	N/A	15.07.08.05.D	N/A	15.07.08.05.E	N/A	15.07.08.05.F	N/A
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15.07.08.05	N/A																
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15.07.08.05.C	N/A																
15.07.08.05.D	N/A																
15.07.08.05.E	N/A																
15.07.08.05.F	N/A																

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DOC Number	DOC Text																
LA.04 Rev. A	<p>The information contained in CTS 15.7.8.2 regarding audits of the activities encompassed by the Radioactive Effluent and Materials and Accountability Program (REMCAP) is not being retained in ITS. In conjunction with the ITS project, the REMCAP is being reorganized to reflect the recommendations of GL 89-01, and will become the Offsite Dose Calculation Manual (ODCM). The information contained in CTS 15.7.8.2 will be moved to the ODCM. This information is not necessary to adequately protect the public and can be moved to other documents without impact on safety. Changes to the ODCM will be controlled by the ODCM process in Section 5 of the proposed ITS.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CTS:</td> <td style="width: 50%;">ITS:</td> </tr> <tr> <td>15.07.08.02</td> <td>N/A</td> </tr> <tr> <td>15.07.08.02.A</td> <td>N/A</td> </tr> <tr> <td>15.07.08.02.B</td> <td>N/A</td> </tr> </table>	CTS:	ITS:	15.07.08.02	N/A	15.07.08.02.A	N/A	15.07.08.02.B	N/A								
CTS:	ITS:																
15.07.08.02	N/A																
15.07.08.02.A	N/A																
15.07.08.02.B	N/A																
LA.05 Rev. A	<p>The Bases associated with CTS 15.4.2 is not being retained in ITS, but is moved to the FSAR. This information provides details which are not directly pertinent to the actual requirements. Since these details are not necessary to adequately describe the actual regulatory requirement, they can be moved to other documents without impact on safety. Changes to the FSAR are controlled in accordance with the 10 CFR 50.59 process.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CTS:</td> <td style="width: 50%;">ITS:</td> </tr> <tr> <td>BASES</td> <td>N/A</td> </tr> </table>	CTS:	ITS:	BASES	N/A												
CTS:	ITS:																
BASES	N/A																
LA.06 Rev. B	<p>CTS 15.3.12.A, Control Room Emergency Filtration, has been modified by removing the testing requirements of the Control Room Emergency Filtration (CREF) system. The CREF testing requirements will instead be in accordance with the frequencies specified in Regulatory Guide (RG) 1.52, Revision 2, and in accordance with ASTM D3803-1989 and the methodology of ASME N510-1980, Sections 10, 12 and 13, excluding subsections 10.3 and 12.3. Although this change will result in less restrictive testing requirements for the HEPA filters and charcoal adsorbers, Regulatory Guide 1.52 contains methods acceptable to the NRC for implementing the regulations in 10 CFR 50, Appendix A, with regard to the testing criteria for air filtration and adsorption units of ESF atmospheric cleanup systems designed to mitigate the consequences of a postulated accident.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CTS:</td> <td style="width: 50%;">ITS:</td> </tr> <tr> <td>15.03.12.02.a</td> <td>N/A</td> </tr> <tr> <td>15.03.12.02.b</td> <td>N/A</td> </tr> <tr> <td>15.04.11.01</td> <td>SPEC 5.05.10.d</td> </tr> <tr> <td>15.04.11.04.a</td> <td>N/A</td> </tr> <tr> <td>15.04.11.04.b</td> <td>N/A</td> </tr> <tr> <td>15.04.11.04.c</td> <td>N/A</td> </tr> <tr> <td>15.04.11.04.d</td> <td>N/A</td> </tr> </table>	CTS:	ITS:	15.03.12.02.a	N/A	15.03.12.02.b	N/A	15.04.11.01	SPEC 5.05.10.d	15.04.11.04.a	N/A	15.04.11.04.b	N/A	15.04.11.04.c	N/A	15.04.11.04.d	N/A
CTS:	ITS:																
15.03.12.02.a	N/A																
15.03.12.02.b	N/A																
15.04.11.01	SPEC 5.05.10.d																
15.04.11.04.a	N/A																
15.04.11.04.b	N/A																
15.04.11.04.c	N/A																
15.04.11.04.d	N/A																

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DOC Number	DOC Text												
LA.07 Rev. A	<p>The Gas Decay Tank oxygen concentration limit and the required actions if the limit is exceeded are not being retained in ITS. This information will be contained in the Explosive Gas Monitoring Program. This information is not necessary to adequately protect the public and can be moved to other documents without impact on safety. Changes to the Explosive Gas Monitoring Program will be controlled via the 10 CFR 50.59 process.</p> <table><thead><tr><th style="text-align: left;">CTS:</th><th style="text-align: left;">ITS:</th></tr></thead><tbody><tr><td>15.07.05.A</td><td>N/A</td></tr><tr><td>15.07.05.A.01</td><td>N/A</td></tr><tr><td>15.07.05.A.02</td><td>N/A</td></tr></tbody></table>	CTS:	ITS:	15.07.05.A	N/A	15.07.05.A.01	N/A	15.07.05.A.02	N/A				
CTS:	ITS:												
15.07.05.A	N/A												
15.07.05.A.01	N/A												
15.07.05.A.02	N/A												
LB.01 Rev. A	<p>CTS 15.7.8.3.d and 15.7.8.7 contain requirements to establish and maintain a Process Control Program (PCP) to assure compliance with 10 CFR Parts 20, 61 and 71. These requirements duplicate current regulations which provide sufficient and appropriate control of these requirements. Therefore, these details are not required to be in the ITS to provide adequate protection of public health and safety. Since this information is contained in 10 CFR Parts 20, 61 and 71, the requirements will continue to be applicable to Point Beach. Therefore, this change is an administrative relocation of information.</p> <table><thead><tr><th style="text-align: left;">CTS:</th><th style="text-align: left;">ITS:</th></tr></thead><tbody><tr><td>15.07.08.03.D</td><td>N/A</td></tr><tr><td>15.07.08.07.A</td><td>N/A</td></tr><tr><td>15.07.08.07.A.01</td><td>N/A</td></tr><tr><td>15.07.08.07.A.02</td><td>N/A</td></tr><tr><td>15.07.08.07.A.03</td><td>N/A</td></tr></tbody></table>	CTS:	ITS:	15.07.08.03.D	N/A	15.07.08.07.A	N/A	15.07.08.07.A.01	N/A	15.07.08.07.A.02	N/A	15.07.08.07.A.03	N/A
CTS:	ITS:												
15.07.08.03.D	N/A												
15.07.08.07.A	N/A												
15.07.08.07.A.01	N/A												
15.07.08.07.A.02	N/A												
15.07.08.07.A.03	N/A												

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LB.02 Rev. A	<p>The Tendon Surveillance Program of CTS 15.4.4.II is not being retained in the ITS. 10 CFR 50.55.a requires facilities to adopt the ASME Section XI, Subsection IWE and IWL programs by September 2001. Point Beach will adopt these Section XI programs prior to ITS implementation. Therefore, the Tendon Surveillance Program will be duplicative of the requirements specified by ASME Section XI, as endorsed and required under 10 CFR 50.55a. Inclusion of these requirements via reference into 10 CFR 50.55a makes these requirement applicable to Point Beach without the need to duplicate these requirements in the Technical Specifications.</p> <table border="1"><thead><tr><th style="text-align: left;">CTS:</th><th style="text-align: left;">ITS:</th></tr></thead><tbody><tr><td>15.04.04.II</td><td>N/A</td></tr><tr><td>15.04.04.II.A</td><td>N/A</td></tr><tr><td>15.04.04.II.B</td><td>N/A</td></tr><tr><td>15.04.04.II.C</td><td>N/A</td></tr><tr><td>15.04.04.II.C.01</td><td>N/A</td></tr><tr><td>15.04.04.II.C.01.A</td><td>N/A</td></tr><tr><td>15.04.04.II.C.02</td><td>N/A</td></tr><tr><td>15.04.04.II.C.02.A</td><td>N/A</td></tr><tr><td>15.04.04.II.C.02.B</td><td>N/A</td></tr><tr><td>15.04.04.II.C.02.B.I</td><td>N/A</td></tr><tr><td>15.04.04.II.C.02.B.II</td><td>N/A</td></tr><tr><td>15.04.04.II.C.02.B.III</td><td>N/A</td></tr><tr><td>15.04.04.II.C.02.B.IV</td><td>N/A</td></tr><tr><td>15.04.04.II.C.02.C</td><td>N/A</td></tr><tr><td>15.04.04.II.C.02.D</td><td>N/A</td></tr><tr><td>15.04.04.II.C.02.E</td><td>N/A</td></tr><tr><td>15.04.04.II.C.02.E.01</td><td>N/A</td></tr><tr><td>15.04.04.II.C.02.E.02</td><td>N/A</td></tr><tr><td>15.04.04.II.C.02.E.03</td><td>N/A</td></tr><tr><td>15.04.04.II.D</td><td>N/A</td></tr></tbody></table>	CTS:	ITS:	15.04.04.II	N/A	15.04.04.II.A	N/A	15.04.04.II.B	N/A	15.04.04.II.C	N/A	15.04.04.II.C.01	N/A	15.04.04.II.C.01.A	N/A	15.04.04.II.C.02	N/A	15.04.04.II.C.02.A	N/A	15.04.04.II.C.02.B	N/A	15.04.04.II.C.02.B.I	N/A	15.04.04.II.C.02.B.II	N/A	15.04.04.II.C.02.B.III	N/A	15.04.04.II.C.02.B.IV	N/A	15.04.04.II.C.02.C	N/A	15.04.04.II.C.02.D	N/A	15.04.04.II.C.02.E	N/A	15.04.04.II.C.02.E.01	N/A	15.04.04.II.C.02.E.02	N/A	15.04.04.II.C.02.E.03	N/A	15.04.04.II.D	N/A
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15.04.04.II.C.02.E.03	N/A																																										
15.04.04.II.D	N/A																																										

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LB.03 Rev. A	<p>The End Anchorage Concrete Surveillance requirements of CTS 15.4.4.III are not being retained in the ITS. The Inservice Inspection of ASME Code Class 1, Class 2, and Class 3 components are required to be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55.a(g) modified by Section 50.55.a(b), except where specific relief is granted by the NRC, pursuant to 10 CFR 50, Section 50.55a(g)(6)(i). Therefore, the Inservice Inspection requirements in the CTS are duplicative of the above ASME Section XI requirements and removing these requirements from CTS is an administrative relocation of the information.</p> <table><thead><tr><th style="text-align: left;">CTS:</th><th style="text-align: left;">ITS:</th></tr></thead><tbody><tr><td>15.04.04.III</td><td>N/A</td></tr><tr><td>15.04.04.III.A</td><td>N/A</td></tr><tr><td>15.04.04.III.B</td><td>N/A</td></tr><tr><td>15.04.04.III.C</td><td>N/A</td></tr><tr><td>15.04.04.III.C.01</td><td>N/A</td></tr><tr><td>15.04.04.III.C.02</td><td>N/A</td></tr><tr><td>15.04.04.III.C.03</td><td>N/A</td></tr><tr><td>15.04.04.III.C.04</td><td>N/A</td></tr><tr><td>15.04.04.III.C.05</td><td>N/A</td></tr><tr><td>15.04.04.III.C.06</td><td>N/A</td></tr><tr><td>15.04.04.III.D</td><td>N/A</td></tr><tr><td>15.04.04.III.E</td><td>N/A</td></tr></tbody></table>	CTS:	ITS:	15.04.04.III	N/A	15.04.04.III.A	N/A	15.04.04.III.B	N/A	15.04.04.III.C	N/A	15.04.04.III.C.01	N/A	15.04.04.III.C.02	N/A	15.04.04.III.C.03	N/A	15.04.04.III.C.04	N/A	15.04.04.III.C.05	N/A	15.04.04.III.C.06	N/A	15.04.04.III.D	N/A	15.04.04.III.E	N/A
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15.04.04.III.C.06	N/A																										
15.04.04.III.D	N/A																										
15.04.04.III.E	N/A																										
LB.04 Rev. A	<p>The Liner Plate examination requirements of CTS 15.4.4.IV are not being retained in the ITS. The Inservice Inspection of ASME Code Class 1, Class 2, and Class 3 components are required to be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55.a(g) modified by Section 50.55.a(b), except where specific relief is granted by the NRC, pursuant to 10 CFR 50, Section 50.55a(g)(6)(i). Therefore, the Inservice Inspection requirements in the CTS are duplicative of the above ASME Section XI requirements and removing these requirements from CTS is an administrative relocation of the information.</p> <table><thead><tr><th style="text-align: left;">CTS:</th><th style="text-align: left;">ITS:</th></tr></thead><tbody><tr><td>15.04.04.IV</td><td>N/A</td></tr><tr><td>15.04.04.IV.A</td><td>N/A</td></tr><tr><td>15.04.04.IV.A.01</td><td>N/A</td></tr><tr><td>15.04.04.IV.A.02</td><td>N/A</td></tr><tr><td>15.04.04.IV.B</td><td>N/A</td></tr><tr><td>15.04.04.IV.C</td><td>N/A</td></tr><tr><td>15.04.04.IV.D</td><td>N/A</td></tr><tr><td>15.04.04.IV.E</td><td>N/A</td></tr></tbody></table>	CTS:	ITS:	15.04.04.IV	N/A	15.04.04.IV.A	N/A	15.04.04.IV.A.01	N/A	15.04.04.IV.A.02	N/A	15.04.04.IV.B	N/A	15.04.04.IV.C	N/A	15.04.04.IV.D	N/A	15.04.04.IV.E	N/A								
CTS:	ITS:																										
15.04.04.IV	N/A																										
15.04.04.IV.A	N/A																										
15.04.04.IV.A.01	N/A																										
15.04.04.IV.A.02	N/A																										
15.04.04.IV.B	N/A																										
15.04.04.IV.C	N/A																										
15.04.04.IV.D	N/A																										
15.04.04.IV.E	N/A																										

Description of Changes - NUREG-1431 Section 5.05

29-Aug-00

DOC Number	DOC Text										
LB.05 Rev. a	<p>The Inservice Inspection requirements of CTS 15.4.2.B, 15.4.2.B.1 and 15.4.2.B.3 are not being retained in the ITS. The Inservice Inspection of ASME Code Class 1, Class 2, and Class 3 components are required to be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55.a(g) modified by Section 50.55.a(b), except where specific relief is granted by the NRC, pursuant to 10 CFR 50, Section 50.55a(g)(6)(i). Therefore, the Inservice Inspection requirements in the CTS are duplicative of the above ASME Section XI requirements and removing these requirements from CTS is an administrative relocation of the information.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CTS:</td> <td style="width: 50%;">ITS:</td> </tr> <tr> <td>15.04.02.B</td> <td>N/A</td> </tr> <tr> <td>15.04.02.B.01</td> <td>N/A</td> </tr> <tr> <td>15.04.02.B.01.a</td> <td>N/A</td> </tr> <tr> <td>15.04.02.B.03</td> <td>N/A</td> </tr> </table>	CTS:	ITS:	15.04.02.B	N/A	15.04.02.B.01	N/A	15.04.02.B.01.a	N/A	15.04.02.B.03	N/A
CTS:	ITS:										
15.04.02.B	N/A										
15.04.02.B.01	N/A										
15.04.02.B.01.a	N/A										
15.04.02.B.03	N/A										
M.01 Rev. A	<p>CTS 15.6.8.4.A is proposed to be revised by the addition of "radioactive gases, and particulates in" before the words "containment atmosphere and in plant gaseous effluent samples . . ." The addition of this text imposes additional requirements on unit operation and is more restrictive.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CTS:</td> <td style="width: 50%;">ITS:</td> </tr> <tr> <td>15.06.08.04.A</td> <td>SPEC 5.05.03</td> </tr> </table>	CTS:	ITS:	15.06.08.04.A	SPEC 5.05.03						
CTS:	ITS:										
15.06.08.04.A	SPEC 5.05.03										
M.02 Rev. A	<p>The CTS has been revised by the addition of a requirement to establish, implement and maintain a Primary Coolant Sources Outside Containment Program. This program is required to provide controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practical. The program will be required to include preventive maintenance and periodic visual inspection requirements, and integrated leak test requirements for each system. This change imposes additional requirements for unit operation and is more restrictive.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CTS:</td> <td style="width: 50%;">ITS:</td> </tr> <tr> <td>NEW</td> <td>SPEC 5.05.02</td> </tr> <tr> <td></td> <td>SPEC 5.05.02.a</td> </tr> <tr> <td></td> <td>SPEC 5.05.02.b</td> </tr> </table>	CTS:	ITS:	NEW	SPEC 5.05.02		SPEC 5.05.02.a		SPEC 5.05.02.b		
CTS:	ITS:										
NEW	SPEC 5.05.02										
	SPEC 5.05.02.a										
	SPEC 5.05.02.b										
M.03 Rev. a	<p>CTS 15.4.11.1 has been revised from requiring the pressure drop test across the combined HEPA filters and charcoal adsorber banks be demonstrated to be < 6 inches of water at "design Flow rate" to "4950 cfm +/- 10%." Stipulating the value of the design flow in the Technical Specifications imposes additional requirements and is therefore more restrictive.</p> <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">CTS:</td> <td style="width: 50%;">ITS:</td> </tr> <tr> <td>15.04.11.01</td> <td>SPEC 5.05.10.d</td> </tr> </table>	CTS:	ITS:	15.04.11.01	SPEC 5.05.10.d						
CTS:	ITS:										
15.04.11.01	SPEC 5.05.10.d										

Description of Changes - NUREG-1431 Section 5.05

29-Aug-00

DOC Number	DOC Text
M.04 Rev. A	CTS 15.7.8.3.b.4) has been modified by the addition of a requirement in the Radiological Effluent Program to provide limitations on the functional capability and use of the appropriate portions of the of the liquid and gaseous effluent treatment system. This revision imposes additional requirements on unit operation and is more restrictive. CTS: 15.07.08.03.B.05
	ITS: SPEC 5.05.04.F
M.05 Rev. A	CTS 15.7.8.3.c has been modified by the addition of the following requirements. In addition to the requirements to specify the annual doses to a member of the public from radioactive materials in liquid effluents and radioactivity and radiation from uranium fuel cycle sources released from the facility to unrestricted areas, the ODCM will be required to specify quarterly doses and dose commitments. This revision imposes additional requirements and is more restrictive. CTS: 15.07.08.03.C
	ITS: SPEC 5.05.04.D SPEC 5.05.04.J
M.06 Rev. A	The CTS has been modified by the addition of the requirement to provide limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from the facility to areas beyond the site boundary, conforming to 10 CFR 50, Appendix I. This revision imposes additional requirements and is more restrictive. CTS: NEW
	ITS: SPEC 5.05.04.H
M.07 Rev. A	The CTS has been revised by the addition of a requirement to establish, implement and maintain a Component Cyclic or Transient Limit Program. This program is required to provide controls to track the FSAR Section 4.1, cyclic and transient occurrences to ensure that components are maintained within design limits. The requirement to establish, implement and maintain a Component Cyclic or Transient Limit Program imposes additional requirements for unit operation and is more restrictive. CTS: NEW
	ITS: SPEC 5.05.05

Description of Changes - NUREG-1431 Section 5.05

29-Aug-00

DOC Number	DOC Text
M.08 Rev. A	<p>The CTS has been revised by the addition of a requirement to establish, implement and maintain a Reactor Coolant Pump Flywheel Inspection Program. This program is required to provide for the inspection of each reactor coolant pump flywheel per the recommendations of Regulatory Position c.4.b of Regulatory Guide 1.14, Revision 1. However, in lieu of position c.4.b(1) and c.4.b(2), a qualified in-place UT examination over the volume from the inner bore of the flywheel to the circle one-half of the outer radius or a surface examination (MT and PT) of exposed surfaces of the removed flywheels may be conducted at approximately 10 year intervals coinciding with the Inservice Inspection schedule as required by ASME Section XI. The requirement to establish, implement and maintain a Reactor Coolant Pump Flywheel Inspection Program imposes additional requirements for unit operation and is more restrictive.</p> <p>CTS: _____ ITS: _____ NEW SPEC 5.05.06</p>
M.09 Rev. A	<p>CTS 15.4.2.B.3 has been modified by the adoption of a table that indicates the required frequencies for performing inservice testing activities as they relate to the testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. Also, statements requiring the provisions of SR 3.0.2 and SR 3.0.3 to be applicable to the inservice testing activities frequencies have been added to CTS 15.4.2.B.3. These changes impose additional requirements and are therefore more restrictive.</p> <p>CTS: _____ ITS: _____ NEW SPEC 5.05.07.a SPEC 5.05.07.b SPEC 5.05.07.c</p>
M.10 Rev. A	<p>A statement requiring the provisions of SR 3.0.2 to be applicable to the SG Tube Surveillance Testing Program test frequencies has been added to CTS 15.4.2.A. This change imposes additional requirements and is therefore more restrictive.</p> <p>CTS: _____ ITS: _____ NEW SPEC 5.05.08</p>
M.11 Rev. A	<p>CTS 15.4.11.4.b and 15.4.11.4.c have been revised from requiring the DOP and the halogenated hydrocarbon testing at "design velocity +/- 20%" to "4950 cfm +/- 10%," to stipulate the actual design flowrate of the Control Room Emergency ventilation system. This change imposes additional requirements and is therefore more restrictive.</p> <p>CTS: _____ ITS: _____ 15.04.11.04.b SPEC 5.05.10.b 15.04.11.04.c SPEC 5.05.10.b</p>

Description of Changes - NUREG-1431 Section 5.05

29-Aug-00

DOC Number	DOC Text
M.12 Rev. A	<p>A statement requiring the provisions of SR 3.0.2 and SR 3.0.3 to be applicable to the Ventilation Filter Test Program test frequencies has been added to CTS 15.4.11. This change imposes additional requirements and is therefore more restrictive.</p> <p>CTS: NEW</p> <p style="text-align: right;">ITS: SPEC 5.05.10</p>
M.13 Rev. A	<p>CTS 15.7.5 has been modified by the addition of a requirement to establish, implement and maintain an Explosive Gas Monitoring Program. This program is required to provide controls for potentially explosive gas mixtures contained in the on-service Gas Decay Tank. The program will include a limit for oxygen concentration in the on-service Gas Decay Tank and a surveillance program to ensure the limit is maintained. Additionally, the provisions of SR 3.0.2 and SR 3.0.3 will be applicable to the program surveillance frequencies. The requirement to establish, implement and maintain an Explosive Gas Monitoring Program imposes additional requirements and is therefore more restrictive.</p> <p>CTS: NEW</p> <p style="text-align: right;">ITS: SPEC 5.05.11 SPEC 5.05.11.A</p>
M.14 Rev. A	<p>CTS 15.4.6.A.6 has been modified by specifying the diesel fuel oil program will establish acceptability of new fuel for use by: determining that the fuel has an API gravity or an absolute specific gravity within limits, a flash point and kinematic viscosity within limits for ASTM 2D fuel oil, and by determining the fuel has a clear and bright appearance with proper color; within 31 days of addition of the new fuel oil to storage tanks, the properties of the new fuel oil (other than API or absolute specific gravity, appearance, and flash point and kinematic viscosity) will be verified to be within limits for ASTM 2D fuel oil; and total particulate concentration of the fuel oil shall be < 10 mg/l, when tested every 92 days in accordance with the applicable ASTM standards. Adopting these requirements imposes additional requirements on unit operation and is therefore more restrictive.</p> <p>CTS: NEW</p> <p style="text-align: right;">ITS: SPEC 5.05.12.A SPEC 5.05.12.A.1 SPEC 5.05.12.A.2 SPEC 5.05.12.A.3 SPEC 5.05.12.B SPEC 5.05.12.C</p>

Description of Changes - NUREG-1431 Section 5.05

29-Aug-00

DOC Number**DOC Text**

M.15
Rev. A

Two new programs are added in the ITS. These programs are:

ITS 5.5.13 Technical Specification (TS) Bases Control
ITS 5.5.14 Safety Function Determination Program (SFDP)

The TS Bases Control Program is provided to specifically delineate the appropriate methods and reviews necessary for a change to the Technical Specification Bases. The Safety Function Determination Program is included to support implementation of the support system OPERABILITY characteristics of the Technical Specifications.

Adopting these programs imposes additional requirements and is therefore more restrictive.

CTS:

NEW

ITS:

SPEC 5.05.13
SPEC 5.05.13.A
SPEC 5.05.13.B.1
SPEC 5.05.13.B.2
SPEC 5.05.13.C
SPEC 5.05.13.D
SPEC 5.05.14
SPEC 5.05.14.01.A
SPEC 5.05.14.01.B
SPEC 5.05.14.01.C
SPEC 5.05.14.01.D
SPEC 5.05.14.02.A
SPEC 5.05.14.02.B
SPEC 5.05.14.02.C

Description of Changes - NUREG-1431 Section 5.05

29-Aug-00

DOC Number**DOC Text**

M.16
Rev. A

Included in CTS 15.6.12 are the requirements for the Containment Leakage Rate Testing Program (CLRTP). These requirements will be retained in the proposed ITS in new section 5.5.15, with additional requirements for air lock testing being added.

NUREG-1431 SR 3.6.1.1 includes CLRTP acceptance criteria, which mirror those contained in CTS 15.6.12.D. However, these requirements were not adopted in proposed ITS SR 3.6.1.1. Proposed ITS SR 3.6.1.1 simply states "in accordance with the Containment Leakage Rate Testing Program" when describing the CLRTP acceptance criteria. Therefore, the PBNP CLRTP requirements are being added to section 5.5, "Programs and Manuals," of the proposed ITS so that the CLRTP requirements are included in the Technical Specifications.

NUREG-1431 SR 3.6.2.1 includes air lock leakage rate acceptance criteria. However, these requirements were not adopted in proposed ITS SR 3.6.2.1. Proposed ITS SR 3.6.2.1 simply states "in accordance with the Containment Leakage Rate Testing Program" when describing the air lock leakage rate acceptance criteria. Therefore, the PBNP air lock leakage rate acceptance criteria is being added to section 5.5.15 (CLRTP requirements) of the proposed ITS so that the requirements are included in the Technical Specifications.

This change is more restrictive, since it adds an additional section on CLRTP requirements to proposed ITS section 5.5.

CTS:

NEW

ITS:

SPEC 5.05.15.D.03

SPEC 5.05.15.D.03.a

SPEC 5.05.15.D.03.b

15.3.12 CONTROL ROOM EMERGENCY FILTRATION

Applicability

Applies to the operability of the control room emergency filtration.

Objective

To specify functional requirements of the control room emergency filtration during power operation and refueling operation.

Insert 5.5-1 ← A.4

See 3.7.10 >

Specification

1. Except as specified in 15.3.12.3 below, the control room emergency filtration system shall be operable at all times during power operation and refueling operation of either unit.

2. a. The results of in-place ~~cold DOP and halogenated hydrocarbon~~ tests, conducted in accordance with Specification 15.4.11, on HEPA filter and charcoal adsorber banks shall show a minimum of 99% DOP removal and 99% halogenated hydrocarbon removal.

LA.6

b. The results of laboratory charcoal adsorbent tests, conducted in accordance with Specification 15.4.11, shall show a minimum of 99% removal of methyl iodide. ~~If laboratory analysis results for in-place charcoal indicate less than 99% methyl iodide removal, this specification may be met by replacement with charcoal adsorbent which has been verified to achieve 99% minimum removal and which has been stored in sealed containers, and retesting the charcoal adsorber bank for halogenated hydrocarbon removal.~~

LA.6

See 3.7.10 >

c. The results of fan testing, conducted in accordance with specification 15.4.11, shall show operation within $\pm 10\%$ of design flow.

LA.6

A.11

methyl iodide penetration $\leq 1.0\%$

the methodology of ANSI N510-1980, Sections 10 and 12, excluding subsections 10.3 and 12.3

ASTM D3803-1989 and the methodology of ANSI N510-1980, Section 13, excluding subsection 12.3

penetration and system bypass $\leq 1.0\%$ ← A.11

LA.6

15.4.11 CONTROL ROOM EMERGENCY FILTRATION

See 3.7.10 >

Applicability

Applies to periodic testing requirements of the control room emergency filtration equipment.

Objective

To verify the operability of the control room emergency filtration and its ability to remove radioactive contaminants when required.

Specification

LA.6

1. ~~At least once per year~~ the pressure drop across the combined HEPA filters and charcoal adsorber banks shall be demonstrated to be less than 6 inches of water at ~~design flow rate~~ 4950 cfm ± 10%. M.3

2. The control room emergency filtration automatic initiation shall be demonstrated once per year.

3. The control room emergency filtration shall be operated at least 10 hours every month.

4. Components of the control room emergency filtration shall be tested as follows: < See 3.7.10 >

a. HEPA filters and charcoal adsorbers shall be tested and analyzed ~~at least once per year, or after 720 hours of operation since the previous test, and following significant painting, fire or chemical release in the control room during filtration operation.~~

b. Cold DOP testing of the HEPA filter bank shall be performed ~~after each complete or partial replacement of HEPA filters, or after any structural maintenance on the filter housing.~~ DOP testing shall be at design velocity ± 20%.

M.11

4950 cfm ± 10%

LA.6

at the frequencies specified in Regulatory Guide 1.52, Revision 2



Insert 5.5-5

M.12

A.4

c. Halogenated hydrocarbon testing of the charcoal adsorber bank shall be performed

after each complete or partial replacement of charcoal adsorbers or after any structural maintenance of the adsorber housing. Halogenated hydrocarbon testing shall be at

design velocity $\pm 20\%$ ← 4950 cfm $\pm 10\%$ ← M.11

d. Laboratory sample analysis of in-place charcoal adsorbent shall be performed at least

once per year for standby service or after every 720 hours of system operation and, as

a minimum, shall be conducted at velocities within 20% of design, 1.75 mg/m³ inlet

iodide concentration, 95% relative humidity and 30°C (86°F).

e. Fans shall be tested at least once per year or after 720 hours of operation since the previous test, and following fan maintenance or repair.

LA.6 → within the tolerances of ASTM D3803-1989.

in accordance with the methodology of ANSI N510-1980, Section 13, excluding subsection 12.3

LA.6

< See 3.7.10

LA.6 → at the frequencies specified in Regulatory Guide 1.52, Revision 2

Basis

The control room emergency filtration system is designed to filter the control room atmosphere and makeup air to the control room during control room isolation conditions. The control room emergency filtration is normally isolated and not in operation and testing more frequently than that specified is not required to insure operability or performance. If the efficiencies of HEPA and charcoal adsorbers are as specified, the resulting control room doses during accident conditions will be less than allowable levels in Criterion 19 of Appendix A to 10 CFR 50. The charcoal adsorbent

laboratory sample analysis is performed in accordance with ASTM D3803-89, "Standard Test Method for Nuclear-Grade Activated Carbon."

A.4

B
RAI 5.5-2
RAI 5.5-4

Insert 5.5-1

A program shall be established to implement the following required testing of the Control Room Emergency Filtration system (F-16) at the frequencies specified in Regulatory Guide 1.52, Revision 2, and in accordance with ASTM D3803-1989 and the methodology of ANSI N510-1980, as prescribed below.



Insert 5.5-2

The provisions of SR 3.0.2 are applicable to the SG Tube Surveillance Program test frequencies.

Insert 5.5-3

- a. Testing frequencies specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as follows:

<u>ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice testing activities</u>	<u>Required Frequencies for performing inservice testing activities</u>
Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days
Biennially or every 2 years	At least once per 731 days

- b. The provisions of SR 3.0.2 are applicable to the above required Frequencies for performing inservice testing activities;
- c. The provisions of SR 3.0.3 are applicable to inservice testing activities; and

Justification For Deviations - NUREG-1431 Section 5.05

31-Aug-00

JFD Number	JFD Text												
07 Rev. A	<p>NUREG-1431, specification 5.5.10, Secondary Water Chemistry Program, has been modified by the deletion of the requirement for the program to provide controls to monitor secondary water chemistry to inhibit low pressure turbine disc stress corrosion cracking. This requirement is not a part of the Point Beach current licensing basis.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">ITS:</td> <td style="width: 50%;">NUREG:</td> </tr> <tr> <td>SPEC 5.05.09</td> <td>SPEC 5.05.10</td> </tr> </table>	ITS:	NUREG:	SPEC 5.05.09	SPEC 5.05.10								
ITS:	NUREG:												
SPEC 5.05.09	SPEC 5.05.10												
08 Rev. B	<p>NUREG-1431, specification 5.5.11, Ventilation Filter Testing Program (VFTP), has been modified. References to "Engineered Safety Feature (ESF) filter ventilation systems" have been replaced with "Control Room Emergency Filtration System (F-16)," because this is the only filter ventilation system at Point Beach which requires the testing delineated in this specification. This distinction has also resulted in reorganization of the specification.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">ITS:</td> <td style="width: 50%;">NUREG:</td> </tr> <tr> <td>SPEC 5.05.10</td> <td>SPEC 5.05.11</td> </tr> <tr> <td>SPEC 5.05.10.a</td> <td>SPEC 5.05.11.a</td> </tr> <tr> <td>SPEC 5.05.10.b</td> <td>SPEC 5.05.11.b</td> </tr> <tr> <td>SPEC 5.05.10.c</td> <td>SPEC 5.05.11.c</td> </tr> <tr> <td>SPEC 5.05.10.d</td> <td>SPEC 5.05.11.d</td> </tr> </table>	ITS:	NUREG:	SPEC 5.05.10	SPEC 5.05.11	SPEC 5.05.10.a	SPEC 5.05.11.a	SPEC 5.05.10.b	SPEC 5.05.11.b	SPEC 5.05.10.c	SPEC 5.05.11.c	SPEC 5.05.10.d	SPEC 5.05.11.d
ITS:	NUREG:												
SPEC 5.05.10	SPEC 5.05.11												
SPEC 5.05.10.a	SPEC 5.05.11.a												
SPEC 5.05.10.b	SPEC 5.05.11.b												
SPEC 5.05.10.c	SPEC 5.05.11.c												
SPEC 5.05.10.d	SPEC 5.05.11.d												
09 Rev. A	<p>NUREG-1431, specification 5.5.11.d requirement to demonstrate the pressure drop across the combined HEPA filters, the prefilters, and the charcoal adsorbers, has been modified by the deletion of the requirement to include "prefilters." The Point Beach current licensing basis (CTS 15.4.11.1) does not require "prefilters" to be included in the overall pressure drop surveillance.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">ITS:</td> <td style="width: 50%;">NUREG:</td> </tr> <tr> <td>SPEC 5.05.10.d</td> <td>SPEC 5.05.11.d</td> </tr> </table>	ITS:	NUREG:	SPEC 5.05.10.d	SPEC 5.05.11.d								
ITS:	NUREG:												
SPEC 5.05.10.d	SPEC 5.05.11.d												
10 Rev. A	<p>The liquid radwaste requirements of NUREG-1431, specification 5.5.12, Explosive Gas and Storage Tank Radioactivity Monitoring Program, have not been retained in ITS 5.5.11. This reflects the current licensing basis (CTS 15.7.5). The requirements associated with Radiological Effluent Technical Specifications were relocated from the Point Beach CTS to the Radiological Effluents and Materials Control and Accountability Program (REMCAP) using the guidance of Generic Letters 89-01 and 95-10. Removal of these requirements were approved in the NRC Safety Evaluation for Amendments 184 (Unit 1) and 188 (Unit 2). The specification has been reformatted as appropriate due to the deletion of the radwaste related requirements.</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">ITS:</td> <td style="width: 50%;">NUREG:</td> </tr> <tr> <td>N/A</td> <td>SPEC 5.05.12.B</td> </tr> <tr> <td></td> <td>SPEC 5.05.12.C</td> </tr> <tr> <td>SPEC 5.05.11</td> <td>SPEC 5.05.12</td> </tr> </table>	ITS:	NUREG:	N/A	SPEC 5.05.12.B		SPEC 5.05.12.C	SPEC 5.05.11	SPEC 5.05.12				
ITS:	NUREG:												
N/A	SPEC 5.05.12.B												
	SPEC 5.05.12.C												
SPEC 5.05.11	SPEC 5.05.12												

Justification For Deviations - NUREG-1431 Section 5.05

31-Aug-00

JFD Number	JFD Text
11 Rev. A	<p>NUREG-1431, specification 5.5.12.a has been modified by the deletion of the requirement for a hydrogen concentration limit in the Gas Decay Tank. Point Beach current licensing basis (CTS 15.7.5) only requires a limit on the concentration of oxygen in the Gas Decay Tank.</p> <p>ITS: SPEC 5.05.11.A</p> <p>NUREG: SPEC 5.05.12.A</p>
12 Rev. A	<p>NUREG-1431, specification 5.5.13, Diesel Fuel Oil Testing Program, has been modified. The requirement to verify the other properties of ASTM 2D fuel oil within 31 days "following" addition of new fuel oil to the storage tanks, has been modified to within 31 days "of" addition of new fuel oil to the storage tanks. This change is necessary due to the configuration of the diesel fuel oil storage system at Point Beach.</p> <p>The Point Beach diesel fuel oil system includes a fill tank in addition to the storage tanks. The new fuel oil is received in the fill tank, where the new fuel oil is sampled and stored until the test results are obtained. Once satisfactory test results are obtained, the fuel oil is transferred to the storage tanks. Therefore, the requirement to verify "the other properties" of ASTM 2D fuel within 31 days "of" addition to the storage tanks is necessary to prevent redundant testing of new fuel oil (tested upon receipt in the fill tank), upon transfer to the storage tanks.</p> <p>ITS: SPEC 5.05.12.B</p> <p>NUREG: SPEC 5.05.13.B</p>
13 Rev. A	<p>NUREG-1431, specification 5.5.13, Diesel Fuel Oil Testing Program, has been revised from requiring the total particulate concentration of the fuel oil to be tested "every 31 days" to "every 92 days", consistent with CTS 15.4.6.A.6.</p> <p>ITS: SPEC 5.05.12.C</p> <p>NUREG: SPEC 5.05.13.C</p>
14 Rev. A	<p>NUREG-1431, specification 5.5.13, Diesel Fuel Oil Testing Program, has been revised from requiring the total particulate concentration of the fuel oil to be tested in accordance with "ASTM D-2276, Method A-2 or A-3" to "the applicable ASTM standards." This change is necessary because ASTM D-2276 provides testing requirements for a field monitor system. Point Beach does not utilize a field monitor, but rather uses the laboratory analysis method. Specifying the total particulate concentration of the fuel will be tested in accordance with the applicable ASTM standards is consistent with CTS 15.4.6.A.6.</p> <p>ITS: SPEC 5.05.12.C</p> <p>NUREG: SPEC 5.05.13.C</p>

Justification For Deviations - NUREG-1431 Section 5.05

31-Aug-00

JFD Number	JFD Text																										
15 Rev. A	<p>NUREG-1431 has been modified by the addition of a Containment Leakage Rate Testing Program, based on the current licensing basis. This additional program is based on CTS 15.6.12, approved exemptions to 10 CFR 50, Appendix J, and the requirements of 10 CFR 50 Appendix J, Option B.</p> <table><thead><tr><th>ITS:</th><th>NUREG:</th></tr></thead><tbody><tr><td>SPEC 5.05.15</td><td>N/A</td></tr><tr><td>SPEC 5.05.15.A</td><td>N/A</td></tr><tr><td>SPEC 5.05.15.B</td><td>N/A</td></tr><tr><td>SPEC 5.05.15.C</td><td>N/A</td></tr><tr><td>SPEC 5.05.15.D</td><td>N/A</td></tr><tr><td>SPEC 5.05.15.D.01</td><td>N/A</td></tr><tr><td>SPEC 5.05.15.D.02</td><td>N/A</td></tr><tr><td>SPEC 5.05.15.D.03</td><td>N/A</td></tr><tr><td>SPEC 5.05.15.D.03.a</td><td>N/A</td></tr><tr><td>SPEC 5.05.15.D.03.b</td><td>N/A</td></tr><tr><td>SPEC 5.05.15.E</td><td>N/A</td></tr><tr><td>SPEC 5.05.15.F</td><td>N/A</td></tr></tbody></table>	ITS:	NUREG:	SPEC 5.05.15	N/A	SPEC 5.05.15.A	N/A	SPEC 5.05.15.B	N/A	SPEC 5.05.15.C	N/A	SPEC 5.05.15.D	N/A	SPEC 5.05.15.D.01	N/A	SPEC 5.05.15.D.02	N/A	SPEC 5.05.15.D.03	N/A	SPEC 5.05.15.D.03.a	N/A	SPEC 5.05.15.D.03.b	N/A	SPEC 5.05.15.E	N/A	SPEC 5.05.15.F	N/A
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SPEC 5.05.15.D.03.b	N/A																										
SPEC 5.05.15.E	N/A																										
SPEC 5.05.15.F	N/A																										
16 Rev. A	<p>NUREG-1431 has been modified by the addition of a Reactor Coolant System Pressure Isolation Valve Leakage Program, based on CTS 15.4.16.</p> <table><thead><tr><th>ITS:</th><th>NUREG:</th></tr></thead><tbody><tr><td>SPEC 5.05.16</td><td>N/A</td></tr><tr><td>SPEC 5.05.16.01</td><td>N/A</td></tr><tr><td>SPEC 5.05.16.02</td><td>N/A</td></tr><tr><td>SPEC 5.05.16.03</td><td>N/A</td></tr><tr><td>SPEC 5.05.16.04</td><td>N/A</td></tr></tbody></table>	ITS:	NUREG:	SPEC 5.05.16	N/A	SPEC 5.05.16.01	N/A	SPEC 5.05.16.02	N/A	SPEC 5.05.16.03	N/A	SPEC 5.05.16.04	N/A														
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SPEC 5.05.16.03	N/A																										
SPEC 5.05.16.04	N/A																										

Justification For Deviations - NUREG-1431 Section 5.05

31-Aug-00

JFD Number	JFD Text												
17 Rev. B	<p>NUREG-1431, 5.5.11 has been modified to explicitly state that testing of the Control Room Emergency Filtration System will be in accordance with the methodologies of ANSI N510-1980, Sections 10, 12 and 13, excluding subsections 10.3 and 12.3.</p> <p>As stated in ANSI N510-1980, "It is the intent of this standard (N510) that it be rigorously applied only to systems designated and built to ANSI N509, however, sections of this standard may be used for technical guidance for testing of non-N509 systems." Point Beach's design and construction pre-dated the first issuance of ANSI N509; therefore, PBNP was not built or designated as a N509 system.</p> <table><thead><tr><th>ITS:</th><th>NUREG:</th></tr></thead><tbody><tr><td>SPEC 5.05.10</td><td>SPEC 5.05.11</td></tr><tr><td>SPEC 5.05.10.a</td><td>SPEC 5.05.11.a</td></tr><tr><td>SPEC 5.05.10.b</td><td>SPEC 5.05.11.b</td></tr><tr><td>SPEC 5.05.10.c</td><td>SPEC 5.05.11.c</td></tr><tr><td>SPEC 5.05.10.d</td><td>SPEC 5.05.11.d</td></tr></tbody></table>	ITS:	NUREG:	SPEC 5.05.10	SPEC 5.05.11	SPEC 5.05.10.a	SPEC 5.05.11.a	SPEC 5.05.10.b	SPEC 5.05.11.b	SPEC 5.05.10.c	SPEC 5.05.11.c	SPEC 5.05.10.d	SPEC 5.05.11.d
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SPEC 5.05.10.b	SPEC 5.05.11.b												
SPEC 5.05.10.c	SPEC 5.05.11.c												
SPEC 5.05.10.d	SPEC 5.05.11.d												

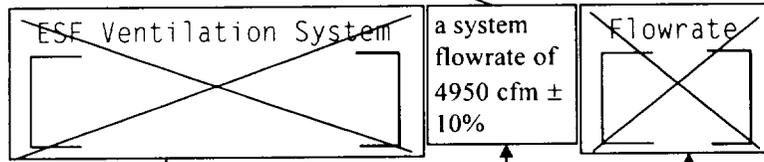
18 Rev. B	<p>NUREG-1431, 5.5.11.c has been modified to more closely reflect the requirements of ASTM D3803-1989. The inequalities preceding the temperature and relative humidity values under which the charcoal adsorbent laboratory sample analysis is required to be performed have been deleted. Also, the phrase "applying the tolerances of ASTM D3803-1989" has been added to the end of the last sentence of the paragraph.</p> <table><thead><tr><th>ITS:</th><th>NUREG:</th></tr></thead><tbody><tr><td>SPEC 5.05.10.c</td><td>SPEC 5.05.11.c</td></tr></tbody></table>	ITS:	NUREG:	SPEC 5.05.10.c	SPEC 5.05.11.c
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SPEC 5.05.10.c	SPEC 5.05.11.c				

5.5 Programs and Manuals

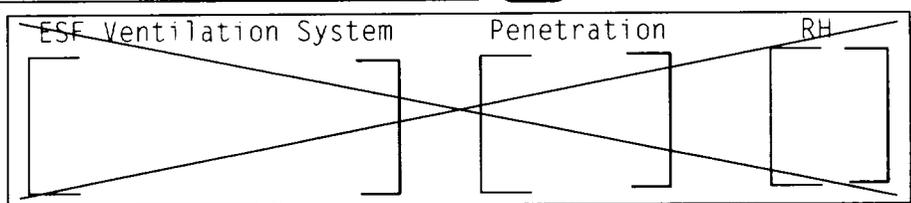
5.5.11 Ventilation Filter Testing Program (VFTP) (continued)

the Control Room
Emergency Filtration
System (F-16)

b. Demonstrate for ~~each of the ESF systems~~ that an in-place test of the charcoal adsorber shows a penetration and system bypass ~~≤ [0.05]%~~ when tested in accordance with ~~[Regulatory Guide 1.52, Revision 2, and ASME N510-1989]~~ at ~~the system flowrate specified below [± 10%]~~.



c. Demonstrate for ~~each of the ESF systems~~ that a laboratory test of a sample of the charcoal adsorber, when obtained ~~as~~ described in ~~[Regulatory Guide 1.52, Revision 2]~~, shows the methyl iodide penetration ~~less than the value specified below~~ when tested in accordance with ~~[ASTM D3803-1989]~~ at a temperature of ~~≤ [30°C]~~ and greater than or equal to the relative humidity ~~specified below~~.



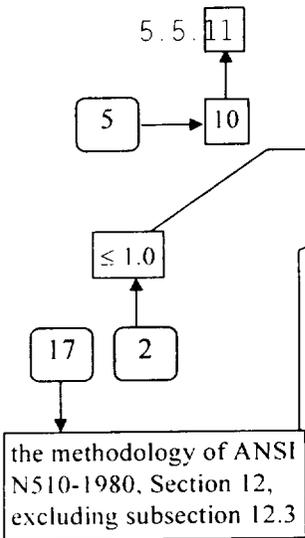
~~Reviewer's Note: Allowable penetration = [100% - methyl iodide efficiency for charcoal credited in staff safety evaluation] / (safety factor).~~

~~Safety factor = [5] for systems with heaters.
= [7] for systems without heaters.~~

d. Demonstrate for ~~each of the ESF systems~~ that the pressure drop across the combined HEPA filters, ~~the prefilters,~~ and the charcoal adsorbers is less than ~~the value specified below~~ when tested in accordance with ~~[Regulatory Guide 1.52,~~

the methodology of ANSI N510-1980, Sections 10 and 12, excluding subsections 10.3 and 12.3

6 inches of water



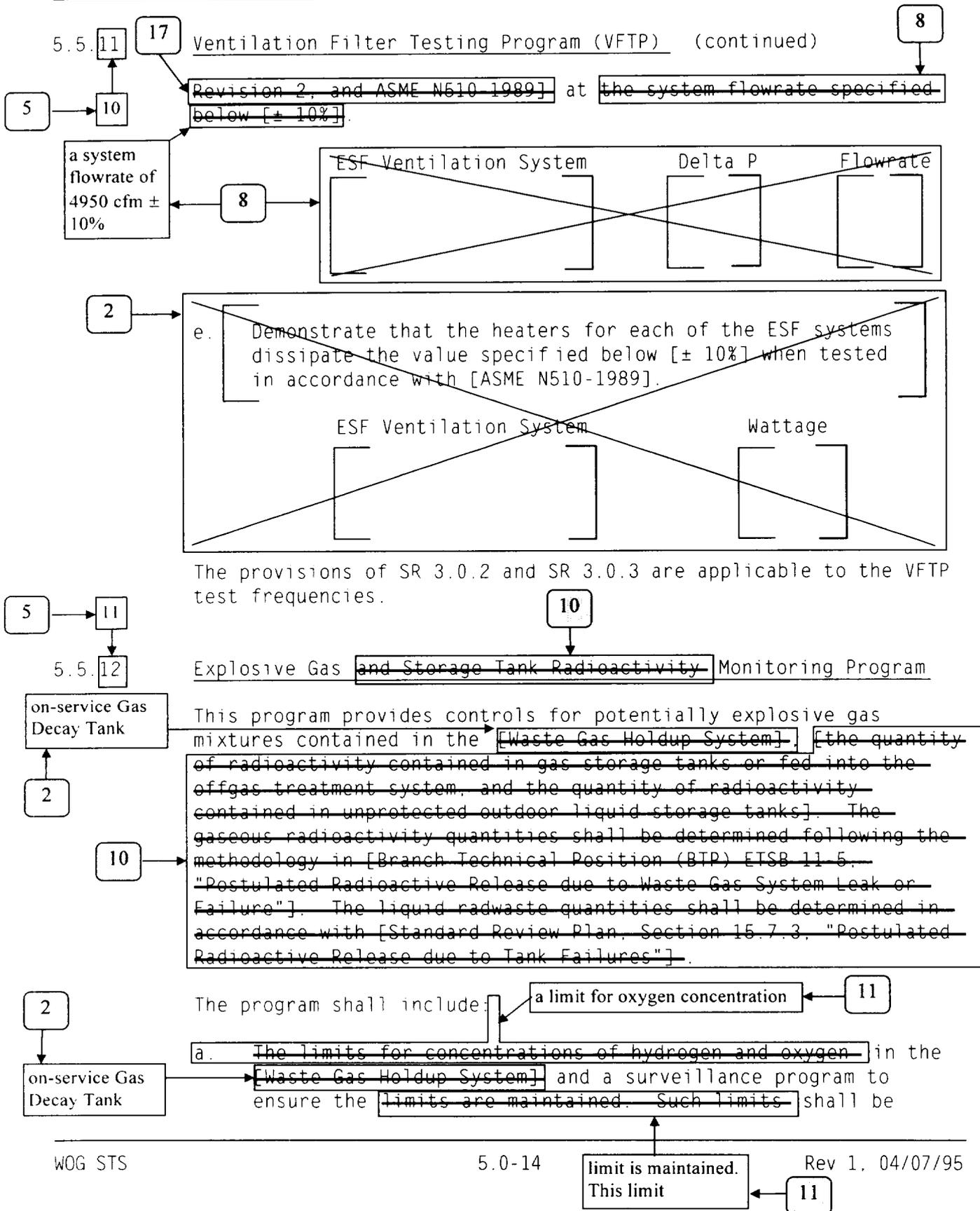
the methodology of ANSI N510-1980, Section 12, excluding subsection 12.3
in accordance with the methodology of ANSI N510-1980, Section 13, excluding subsection 12.3.

30 °C
of 95%

applying the tolerances of ASTM D3803-1989.

the Control Room
Emergency Filtration
System (F-16)

5.5 Programs and Manuals



5.5 Programs and Manuals

5.5.9 Secondary Water Chemistry Program

This program provides controls for monitoring secondary water chemistry to inhibit SG tube degradation. The program shall include:

- a. Identification of a sampling schedule for the critical variables and control points for these variables;
- b. Identification of the procedures used to measure the values of the critical variables;
- c. Identification of process sampling points, which shall include monitoring the discharge of the condensate pumps for evidence of condenser in leakage;
- d. Procedures for the recording and management of data;
- e. Procedures defining corrective actions for all off control point chemistry conditions; and
- f. A procedure identifying the authority responsible for the interpretation of the data and the sequence and timing of administrative events, which is required to initiate corrective action.

5.5.10 Ventilation Filter Testing Program (VFTP)

A program shall be established to implement the following required testing of the Control Room Emergency Filtration System (F-16) at the frequencies specified in Regulatory Guide 1.52, Revision 2, and in accordance with ASTM D3803-1989 and the methodology of ANSI N510-1980, as prescribed below.

- a. Demonstrate for the Control Room Emergency Filtration System (F-16) that an in-place test of the high efficiency particulate air (HEPA) filters shows a penetration and system bypass $\leq 1.0\%$ when tested in accordance with the methodology of ANSI N510-1980, Section 10, excluding subsection 10.3, at a system flowrate of 4950 cfm $\pm 10\%$. 
- b. Demonstrate for the Control Room Emergency Filtration System (F-16) that an in-place test of the charcoal adsorber shows a penetration and system bypass $\leq 1.0\%$ when tested in accordance with the methodology of ANSI N510-1980, Section 12, excluding subsection 12.3, at a system flowrate of 4950 cfm $\pm 10\%$. 

5.5 Programs and Manuals

5.5.10 Ventilation Filter Testing Program (VFTP) (continued)

- c. Demonstrate for the Control Room Emergency Filtration System (F-16) that a laboratory test of a sample of the charcoal adsorber, when obtained in accordance with the methodology of ANSI N510-1980, Section 13, excluding subsection 12.3, shows the methyl iodide penetration $\leq 1.0\%$, when tested in accordance with ASTM D3803-1989 at a temperature of 30°C and a relative humidity of 95%, applying the tolerances of ASTM D3803-1989. 
- d. Demonstrate for the Control Room Emergency Filtration System (F-16) that the pressure drop across the combined HEPA filters and the charcoal adsorbers is less than 6 inches of water when tested in accordance with the methodology of ANSI N510-1980, Sections 10 and 12, excluding subsections 10.3 and 12.3, at a system flowrate of 4950 cfm $\pm 10\%$. 

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the VFTP test frequencies. 

5.5.11 Explosive Gas Monitoring Program

This program provides controls for potentially explosive gas mixtures contained in the on-service Gas Decay Tank.

The program shall include a limit for oxygen concentration in the on-service Gas Decay Tank and a surveillance program to ensure the limit is maintained. This limit shall be appropriate to the system's design criteria (i.e., whether or not the system is designed to withstand a hydrogen explosion).

The provisions of SR 3.0.2 and SR 3.0.3 are applicable to the Explosive Gas Monitoring Program surveillance frequencies.