

November 17, 2000

Mr. Michael B. Sellman, President  
Nuclear Management Company, LLC  
700 First Street  
Hudson, WI 54016

SUBJECT: POINT BEACH NUCLEAR POWER PLANT, UNITS 1 AND 2 - REQUEST FOR  
ADDITIONAL INFORMATION RE: SECTION 3.3 OF IMPROVED TECHNICAL  
SPECIFICATIONS CONVERSION (TAC NOS. MA7186 AND MA7187)

Dear Mr. Sellman:

By letter dated November 15, 1999, the licensee submitted a license amendment request to convert the current Technical Specifications to improved Technical Specifications (ITS) for Point Beach, Units 1 and 2.

The enclosed request was discussed with Mr. Jack Gadzala during a conference call on September 10, 2000. Since the date of that conference call, the staff had further discussions with the licensee on October 10, 12, and November 2, 2000, specifically to discuss issues pertaining to ITS 3.3.1-01. The staff seeks further clarifications of the information requested in the enclosure. A mutually agreeable target date of 60 days from the date of this letter for your response was established. If circumstances result in the need to revise the target date, please contact me at (301) 415-1355 at the earliest opportunity.

Sincerely,

*/RA/*

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

Docket Nos. 50-266 and 50-301

Enclosure: Request for Additional Information

cc w/encl: See next page

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ACCESSION NO.: ML003769547

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Point Beach Nuclear Plant, Units 1 and 2

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October 2000

REQUEST FOR ADDITIONAL INFORMATION

POINT BEACH NUCLEAR POWER PLANT, UNITS 1 AND 2

SECTION 3.3 OF IMPROVED TECHNICAL SPECIFICATIONS CONVERSION

**ITS 3.3.1, Reactor Protection System (RPS) Instrumentation**

**3.3.1-01 DOC LA1, M.2, JFD 28, 30, 31, 54  
ITS 3.3.1, Table 3.3.1-1, Functions 1, 3, 4, 10, 12, 14  
CTS 15.3.5, Table 15.3.5-2, Functions 1, 3, 4, 12, 14.b**

The CTS specifies the Total Number of Channels, the Number of Channels to Trip, and the Minimum Operable Channels. The STS specifies only the Required Channels. For most functions, the ITS sets the Required Channels equal to Total Number of Channels. For the Functions listed above, the ITS uses the CTS Minimum Operable Channels instead of the Total Number of Channels as the Required Channels in the ITS. **Comment:** The STS format is to use the (CTS) total number of channels in the Required Channels column. Use of the CTS Minimum Operable Channels is inconsistent with the STS format. Use of Minimum Operable Channels for these functions, while the Total Number of Channels is used for all other functions, also create an internal inconsistency in the ITS.

- (1) Revise the ITS to use total number of channels. This will also require revision of the related ITS actions to be consistent with one channel inoperable and the STS. DOC LA.1 will also need to be modified to reflect that, in accordance with the STS, the Total Number of Channels is always pertinent to the ITS requirement.
- (2) Explain how requiring one less than the total number of channels to be operable satisfies the testability requirement. For example, if only one of two channels is required, testing the required channel creates a loss of function requiring appropriate action to be taken (e.g., enter 3.0.3).
- (3) State why the referenced instrument functions do not have to satisfy the simple failure criterion. Revise the Bases with this information.
- (4) Describe current plant operating practices as defined by plant procedures regarding plant startup and operation with an inoperable channel in one or more of the referenced instrument functions. What role does plant management play in deciding whether to startup or continue operation with an inoperable instrument channel?

Licensee Response:

ENCLOSURE

**3.3.1-02 DOC L.2, L.5  
ITS 3.3.1, Actions B, D, F, G, H, K, L  
CTS 15.3.5, Table 15.3.5-2, Footnote \*\***

The CTS allows continued operation with one channel inoperable if the affected channel is placed in trip within one hour. The ITS actions adopt the STS requirement to place the channel in trip within 6 hours. **Comment:** The extended Completion Time is justified in DOC L.2 based upon the analysis contained in WCAP-10271-P-A, Supplement 2. This is consistent with the basis for the STS. The safety evaluations for WCAP-10271 require that applicants for the proposed Technical Specification changes for individual plants must confirm the applicability of the generic analysis of the WCAP. The applicability of the WCAP-10271 analysis to Point Beach has not been discussed. Adopting the WCAP as the basis for Completion Times is a technical change that should be the subject of a separate technical evaluation. Note that the extended Completion Time justified by DOC L.5 appears to have been selected to be consistent with the other Completion Times discussed in DOC L.2, although this is not stated in L.5. Revise ITS Completion Times to be consistent with the CTS.

Licensee Response:

**3.3.1-03** Not used

**3.3.1-04 DOC A.8  
ITS 3.3.1 Table 3.3.1-1, Functions 7.a, 9, 10.b - Applicable Modes, Notes (d), (f)  
CTS 15.3.5, Table 15.3.5-2, Functions 7, 8, 10.b - Permissible Bypass  
Conditions  
CTS 15.2.3, Specification 2.A**

The CTS specifies that the pressurizer low pressure, high pressurizer level, and reactor coolant flow for both loop functions be unblocked when Power range nuclear flux  $\geq$  9 percent ( $\pm 1$  percent) or Turbine load  $\geq$  10 percent. It is proposed that the Applicable Modes in the ITS be Mode 1 with Thermal Power  $>$  10 percent rated thermal power (RTP). **Comment:** This change should be classified L. The specific change is less restrictive and is not explicitly justified. In particular, deletion of the specific measurements to be used and the change of the nominal unblock value from 9 percent to 10 percent is not addressed. Provide a specific DOC for this change.

Licensee Response:

**3.3.1-05 DOC A.8**

**ITS 3.3.1 Table 3.3.1-1, Function 9.a - Applicable Modes, Note (e)  
CTS 15.3.5, Table 15.3.5-2, Function 10.a - Permissible Bypass Conditions  
CTS 15.2.3 Specification 2.B**

The CTS specifies that the Low Reactor Coolant System Low Flow in One Loop trip be unblocked at  $\geq 50$  percent of rated power. This is changed in the ITS to applicability in Mode 1 at greater than (but not equal to) 50 percent RTP. **Comment:** This change should be classified as L. The change to not require the function to be operable at 50 percent RTP has not been discussed. Provide a specific DOC for this change.

Licensee Response:

**3.3.1-07 DOC A.8**

**ITS 3.3.1 Table 3.3.1-1, Function 15 - Applicable Modes Note (i) CTS 15.3.5,  
Table 15.3.5-2, Function 10.b - Permissible Bypass Conditions**

The CTS requires Operability of the Turbine Trip functions in all Modes. It does not explicitly specify that they may be blocked when power is  $\leq 50$  percent RTP. The CTS does, however, provide for reducing power below 50 percent as the allowed action for 2 or more channels inoperable. The proposed ITS limits applicability for this function to Thermal Power  $> 50$  percent RTP, or no circulating water pump breakers closed, or high condenser pressure.

**Comment:** This change should be classified as L. The specific change to the tech specs has not been discussed. Under the current CTS, at least one channel is required to be operable in all Modes (presumably Modes 1 & 2). Operation with one operable channel is allowed if power is  $\leq 50$  percent RTP. The proposed ITS allows the entire function to be inoperable if power is  $\leq 50$  percent RTP. Furthermore, it allows the function to be inoperable under the additional conditions that no circulating water pump breakers are closed, and high condenser pressure. The ITS should retain the CTS requirement.

Licensee Response:

**3.3.1-08 DOC A.8**

**ITS 3.3.1 Table 3.3.1-1, Functions 11, 12 - Applicable Modes Note (d)  
ITS 3.3.1 Required Actions G.2, H.2  
CTS 15.3.5, Table 15.3.5-2, Functions 14.a, 14.b - Permissible Bypass  
Conditions  
CTS 15.3.5, Table 15.3.5-2,  
Operator Actions if Conditions of Column 3 Cannot be Met**

The CTS does not specify that the 4 kV bus Undervoltage and Underfrequency functions may be blocked when power is  $\leq 10$  percent RTP. Also, the CTS does not provide for reducing power below 10 percent as the allowed action for two or more channels inoperable. The proposed ITS limits Applicability for this function to Thermal Power  $> 10$  percent RTP.

**Comment:** This change should be classified as L. The specific change to the TSs has not been discussed. Under the current CTS, at least one channel is required to be operable in all Modes (presumably Modes 1 & 2). The proposed ITS allows the entire function to be inoperable if power is  $\leq 10$  percent RTP. The Required Actions for Conditions G and J require

reducing power below 10 percent rather than transition to Mode 3, which would be consistent with the CTS. The CTS Applicability and Required Actions should be retained in the ITS.

Licensee Response:

**3.3.1-09 DOC L.4**  
**ITS 3.3.1 Table 3.3.1-1, Function 16 - Applicable Modes**  
**ITS 3.3.1 Required Action L.2**  
**CTS 15.3.5, Table 15.3.5-2, Function 15**

The CTS does not specify Permissible Bypass Conditions for the Safety Injection input to the RTS. The proposed ITS limits the Applicable Modes for this function to Modes 1 and 2.

**Comment:** The justification for this change is not adequate. The justification provided for L.4 simply restates the proposed change. A technical explanation of why the change is acceptable has not been provided. The No Significant Hazards Considerations (NSHC) states that the function is not required because the reactor is not critical. Certain elements of the RTS and the engineered safety feature actuation system (ESFAS) SI function are, however, required to be operable in Modes 3, 4, and 5. The DOC and NSHC do not discuss why the interface between the RTS and ESFAS is not necessary under these circumstances. Improve the discussion provided in the DOC.

Licensee Response:

**3.3.1-10 DOC A.8, M.21**  
**ITS 3.3.1 Table 3.3.1-1, Functions 10.a, 10.b - Applicable Modes**  
**ITS 3.3.1 Required Actions I.2, J.2**  
**CTS 15.3.5, Table 15.3.5-2, Functions 16.a, 16.b**

The CTS does not specify Permissible Bypass Conditions for the RCP Breaker Open Position functions. The proposed ITS limits the Applicable Modes for this function to Mode 1 above 50 percent RTP for a single-loop trip and Mode 1 above 10 percent but below 50 percent RTP for a trip in two loops. **Comment:** This change should be classified as L. As written, the CTS requires these functions to be operable under all conditions. This may be an administrative error in the CTS. Nevertheless, justification for the change should be provided. Additionally, the statement of the Applicable Modes in the ITS requires the function to be operable below 50 percent RTP and the other function to be operable above 50 percent RTP, but does not require either function to be at 50 percent RTP. If the Applicable Modes of the ITS are changed to be consistent with the above interpretation of the Applicability in the CTS, then the ITS Required Actions I.2 and J.2 are not more restrictive because they allow unlimited operation at reduced power rather than requiring transition to Mode 3. Improve the discussion provided in the DOC and change one of the inequalities to include Mode 1 with Thermal Power = 50 percent RTP. Revise Required Actions for Conditions I and J as appropriate.

Licensee Response:

**3.3.1-11 not used**

**3.3.1-12 JFD 6 (See beyond-scope items 10 & 23)**  
**ITS 3.3.1 Table 3.3.1-1, Function 17.a - Applicable Modes, Note (c)**  
**CTS 15.3.5, Table 15.3.5-2, Function 17.a, Applicability, Note (c)**

The STS limits Applicability for the P-6 bypass function to conditions in which the P-6 interlock is not tripped, i.e., below the actual P-6 setpoint. The proposed ITS limits Applicability to when both Intermediate Range channels read less than  $10^{-10}$  Amps. The proposed ITS also allows that the P-6 trip setpoint must be  $\geq 10^{-10}$  Amps.

This comment is a placeholder for beyond-scope item 10 & 23. It remains open pending technical branch disposition. In addition to technical branch comments, respond to the following:

The proposed ITS creates an incongruous situation in which the function is not required to be OPERABLE within the range of its trip setpoint. Change note (c) to the note used in the STS, "Below the P-6 (Intermediate Range Neutron Flux) interlocks."

Licensee Response:

**3.3.1-13 ITS 3.3.1 CONDITION O (Table 3.3.1-1, Function 17.a)**  
**CTS 15.3.5, Table 15.3.5-2, Function 17.a, Conditions and Required Actions**

Corresponds to beyond-scope item 23; respond in addition to any technical branch questions.

Condition O is added to require verification within 1 hour that the P-6 interlock is in the required state, or opening RTBs within two hours if one *or more* channel(s) are inoperable when in Modes 3, 4, and 5 and rod withdrawal is possible. **Comment:** Manual verification of interlock state is not an appropriate measure to compensate for a loss of an automatic trip function (both channels inoperable). Furthermore, finding that the interlock is not in the required state means that the Source Range trip function has been rendered inoperable by failure of the interlock. If this condition is reached via inoperability of the P-6 interlock, 2 hours is allowed to open RTBs via Required Action O.2. This is inconsistent with CONDITION F which indicates that RTBs must be opened immediately if the Source Range trip is rendered inoperable. Change CONDITION O to apply to one channel inoperable. Change the Completion Time for Conditions O and F to be consistent. A new CONDITION might be added to address both channels inoperable, if so, the Required Actions and Completion times should be equivalent to the ACTIONS required for loss of the Source Range function. It is not necessary that the P-6 LCO include the MODEs 3, 4, and 5 applicability, as the function of the Source Range will already be adequately addressed by Function 4 in Table 3.3.1-1.

Licensee Response:

**3.3.1-14 JFD 39**  
**ITS 3.3.1 Table 3.3.1-1, Functions 17.c, 17.3, Bases**  
**CTS 15.3.5, Table 15.3.5-2, Functions 17.c, 17.e**

The P-9 and Turbine Impulse Pressure interlocks are added to the ITS in LCO 3.3.1 and a discussion is added to the bases. The P-7 interlock included in the STS is not included in the ITS. **Comment:** JFD 39 indicates that the Point Beach design does not include a P-7 interlock, but the Bases for the P-9 and Turbine Impulse Pressure interlocks state that they provide inputs to the P-7 interlock. Revise the Bases to be consistent with the plant-specific design.

Licensee Response:

**3.3.1-15 DOC M.24**  
**ITS 3.3.1 SR 3.3.1.2, Note 1**

A note has been added requiring that the NIS channel be adjusted if it differs from the heat balance calculation by more than 2 percent. **Comment:** A basis for adopting the STS criteria for recalibration has not been provided. Since the existing practice is not described, it is unknown whether the actual practice will be more or less restrictive than the current practice, regardless of the fact that including the value in the TSs makes the TSs themselves more restrictive. Insert a value that is consistent with the assumptions of the plant-specific setpoint analysis and justify the change based upon consistency with that analysis.

Licensee Response:

**3.3.1-16 DOC M.6, M.4, M.7, M.9, A.8, A.7, A.21, A.22**  
**ITS 3.3.1, Table 3.3.1-1, Surveillance Requirements**  
**CTS 15.4.1, Table 15.4.1-1, Functions 1-9, 11, 12, 15, 16, 44, 45**

The CTS requires surveillance under all plant conditions. The ITS adopts the STS philosophy of requiring surveillance only in the specified Applicable Modes for each function. **Comment:** These changes are classified as more restrictive, however, based upon a literal reading of the CTS, they are indeed less restrictive. The DOCs do not discuss the reasons why these less restrictive changes are acceptable. Provide technical justification for the changes in the DOC.

Licensee Response:

**3.3.1-17 DOC M.27 JFD 6, JFD 16 (beyond-scope item 10)**  
**ITS 3.3.1 SR 3.3.1.8, Frequency**  
**CTS 15.4.1, Table 15.4.1-1, Frequency "P"**

The CTS requires functional testing of the Source Range prior to reactor criticality if not performed in the previous week. The STS requires surveillance after passing below P-6. The proposed ITS requires surveillance below  $10^{-10}$  Amps for the source range instrumentation and prior to startup if not performed in the previous 92 days.

This comment is a placeholder for beyond-scope item 10. It remains open pending technical branch disposition. In addition to technical branch comments, respond to the following.

The ITS have been changed in the more restrictive direction to require surveillance of the Source Range function during shutdown. However, the STS was written to require surveillance once the interlock is invoked. Since the actual interlock setpoint may be greater than  $10^{-10}$  Amps, specifying the surveillance requirement based upon the current reading rather than the interlock status allows a condition to occur where the interlock has been invoked but has not been confirmed operable. Consequently, the proposed change does not fully implement the intent of the STS. In addition, the change to require testing within 92 days of criticality vs. within one week of criticality as required by the CTS has not been discussed in a DOC. Change the Frequency requirement to be based upon interlock status rather than current. Further justify changing the test interval prior to criticality from 7 to 92 days.

Licensee Response:

**3.3.1-18 No DOC**  
**ITS 3.3.1 SR 3.3.1.3**  
**CTS 15.4.1, Table 15.4.1-1, Function 1, Note 4**

Note 4 has not been incorporated into the ITS. **Comment:** Deletion of Note 4 has not been discussed. Include CTS note 4 into the ITS. It may be sufficient to add this information to the Bases discussion for SR 3.3.1.3.

Licensee Response:

**3.3.1-19 DOC L.8**  
**ITS 3.3.1 SR 3.3.1.3, Note 2**  
**CTS 15.4.1, Table 15.4.1-1, Frequency "P"**

The CTS requires comparison of Power Range axial flux difference with the *incore detectors* when at power. The proposed ITS requires this comparison below after Thermal Power is 50 percent RTP or greater. The CTS did not restrict the need to conduct the surveillance based on power level. The justification for the restriction is based upon the inaccuracy of the *calorimetric* at low power levels. **Comment:** The limitation of the surveillance requirement has not been justified. The DOC is not germane to the change as SR 3.3.1.3 deals with comparison to incore detectors, not to a calorimetric calculation. Provide an appropriate justification for the change.

Licensee Response:

**3.3.1-20 No DOC**  
**ITS 3.3.1 SR 3.3.1.7**  
**CTS 15.4.1, Table 15.4.1-1, Function 8, Note 17**

CTS Note 17 is not carried over to the ITS. **Comment:** No DOC is provided for not including Note 17 in the ITS. Provide an appropriate justification for the change.

Licensee Response:

**3.3.1-21 DOC M.19**  
**ITS 3.3.1 SR 3.3.1.14, Frequency**  
**CTS 15.4.1, Table 15.4.1-1, Function 15, Frequency "M"**

The CTS requires Monthly functional testing of the Turbine Trip functions. The ITS proposes that the testing only be required prior to exceeding 50 percent RTP whenever the unit has been in Mode 3, if not performed within previous 31 days. This has been justified as a more restrictive change. **Comment:** This is a less restrictive change which has not been justified. Modify the ITS to be consistent with the CTS (require TADOT every 31 days.)

Licensee Response:

**3.3.1-22 DOC L.11, JFD 33**  
**ITS 3.3.1 SR 3.3.1.5 Notes, SR 3.3.1.16**  
**CTS 15.4.1, Table 15.4.1-1, Function 44**

The CTS requires testing of RPS Actuation System Logic every 31 days on a Staggered Test Basis. The STS contains the same requirement. It is proposed that the ITS include notes to limit the Applicability of this surveillance to certain power levels for a number of functions, and to replace this surveillance with an 18-month surveillance for RCP Breaker Position and Reactor Coolant Flow Low in Two Loops functions (SR 3.3.1.16). **Comment:** The DOC and the JFD describe the change, but do not provide justification for the change. It is unlikely that the relaxation is needed as performance of the ACTUATION LOGIC TEST typically will not require operability of the associated measurement channels. Thus, testing the logic for these functions should be possible at all power levels. Furthermore, the use of power levels rather than interlock status in the notes would be an issue as discussed in Comments 3.3.1-12 and 3.3.1-17. Delete the notes in SR 3.3.1.5 and delete SR 3.3.1.16.

Licensee Response:

**3.3.1-23 Not Used.**

**3.3.1-24 No DOC**  
**ITS 3.3.1 SR 3.3.1.4, Frequency**  
**CTS 15.4.1, Table 15.4.1-2, Function 24, Frequency**

The CTS requires Reactor Trip Breaker testing Monthly. The proposed ITS requires testing Monthly on a *Staggered Test Basis*. **Comment:** This change is not discussed in the DOC. Make the ITS consistent with the CTS.

Licensee Response:

**3.3.1-25 No DOC, JFD 27, JFD 16**  
**ITS 3.3.1 Table 3.3.1-1. Allowable Value**  
**CTS 15.2.3**

The limiting safety system settings (LSSS) in the CTS are expressed at trip setpoints (see CTS bases). The ITS proposes to use Allowable Values instead. Furthermore, the STS format presumes the existence of a plant-specific setpoint analysis that sets the context for the form (i.e., allowable values, trip setpoints, or both) in which the LSSS are expressed in the ITS. In the absence of this analysis, the expression of the LSSS in the ITS cannot be unambiguously used to determine instrument operability from measurements of component errors. The Point Beach Allowable Values do not appear to be derived from such an analysis, as reference to setpoint analysis was deleted from the Bases and numerical Allowable Values are not provided in the ITS for certain trip functions. **Comment:** This change is not discussed in a DOC and the plant-specific values do not appear to have been derived using a formal setpoint methodology. Provide justification for using Allowable Values instead of Trip Setpoints. Ensure that the values used are those that were calculated by the plant-specific setpoint analysis. Include a reference to the setpoint analysis in the Bases.

Licensee Response:

**3.3.1-26 JFD 12**  
**ITS 3.3.1 Table 3.3.1-1 Function 14. Allowable Value, and Surveillance**  
**Requirements, SR 3.3.1.15**

The CTS provides no Trip Setpoint for the Steam Generator Water Level Low function. The ITS also provides no Allowable Value for this function, contrary to the STS. Furthermore, the CTS requires calibration of the Steam Generator Water Level function, but the ITS specified surveillance is a TADOT instead of a channel operational test (COT) and Calibration. **Comment:** The STS format requires that a Trip Setpoint and / or Allowable Value be provided for the function. Providing no setpoint is functionally equivalent to deleting the function, which is unacceptable. Furthermore, the ITS specification of a TADOT is inappropriate for an analog measurement channel. Provide the proper Trip Setpoint and / or Allowable Value consistent with the resolution of comment 3.3.1-25. Replace the requirement for TADOT with a requirement for COT and Calibration (SR 3.3.1.7 and SR 3.3.1.11). Delete SR 3.3.1.15, which is not otherwise used.

Licensee Response:

**3.3.1-27 JFD 16**  
**ITS 3.3.1 Table 3.3.1-1 Functions 15.a, 17.c(2) Allowable Value, and**  
**Surveillance Requirements**

No Allowable Value is provided for the Turbine Trip - Low Autostop Pressure and P-9 - Condenser High Pressure functions. **Comment:** The STS format requires that a TRIP SETPOINT and / or Allowable Value be provided for these functions. Since these functions measure an analog parameter, providing no setpoint is functionally equivalent to deleting the function, which is unacceptable. Provide the proper Trip Setting and / or Allowable Value consistent with the resolution of comment 3.3.1-25.

Licensee Response:

**3.3.1-28 DOC A30**  
**CTS 15.3.1.F.3**

The CTS require confirmation that at least one source range detector is on scale during approach to criticality. This has not been carried over to the ITS. **Comment:** The DOC cited as justification does not exist. Provide justification for the change.

Licensee Response:

**3.3.1-29 not used**

**3.3.1-30 DOC L.1 (beyond-scope item 7)**  
**ITS 3.3.1, Action D**  
**CTS 15.3.5, Table 15.3.5-2, New Footnote ##**

The CTS does not allow taking an inoperable channel out of the tripped condition to allow surveillance testing of other channels. The ITS allows for this. The ITS modifies the STS provision that the inoperable channel may be placed in bypass.

This comment is a placeholder for beyond-scope item 7. It remains open pending technical branch disposition. In addition to technical branch comments, respond to the following:

The provision to allow taking the inoperable channel out of the tripped condition is justified in DOC L.1 based upon the analysis contained in WCAP-10271-P-A, Supplement 2. This is consistent with the basis for the STS. The Safety Evaluation Reports for WCAP-10271 require that applicants for the proposed Technical Specification changes for individual plants must confirm the applicability of the generic analysis of the WCAP. The applicability of the WCAP-10271 analysis to Point Beach has not been discussed. Furthermore, the STS allowance is based upon a design which includes bypass provisions. The bypass function includes interlocks that prevent disabling more than one channel at a time. The basis for accepting the STS note allowing bypass in a design that lacks the STS assumed protective interlocks had not been discussed. This is a technical change that should be the subject of a separate technical evaluation. Delete the note allowing removal of inoperable channels from the tripped condition.

Licensee Response:

**3.3.2-01 No DOC, JFD 20  
ITS 3.3.2 Table 3.3.2-1. Allowable Value  
CTS 15.3.5, Table 15.3.5.1 -Setting Limit**

The Setting Limits in the CTS are expressed at trip setpoints (see CTS bases). The ITS is proposed to use Allowable Values instead. Furthermore, the STS format presumes the existence of a plant-specific setpoint analysis that sets the context for the form (i.e., allowable values, trip setpoints, or both) in which the ESFAS settings are expressed in the ITS. In the absence of this analysis, the expression of the settings in the ITS cannot be unambiguously used to determine instrument operability from measurements of component errors. The Point Beach Allowable Values do appear to be derived from such an analysis, as reference to setpoint analysis was deleted from the Bases and numerical Allowable Values are not provided in the ITS for certain RTS and ESFAS functions. **Comment:** This change is not discussed in the DOC and the plant-specific values do not appear to have been derived using a formal setpoint methodology. Provide justification for using Allowable Value instead of Trip Setpoints. Ensure that the values used are those that were calculated by the plant-specific setpoint analysis. Include a reference to the setpoint analysis in the Bases.

Licensee Response:

**3.3.2-02 DOC LA.1, M.3 JFD 2, JFD 35, JFD 10  
ITS 3.3.2, Table 3.3.2-1, Functions 1.a, 3.a, 4.a, 4.d, 4.e, 6.d, 6.e, Completion  
Times, B.1, B.2.1, B.2.2, D.2, D.2.1, D.2.2, E.1, E.2.1, E.2.2, G.1, G.2  
CTS 15.3.5, Table 15.3.5-3, Functions 1.a, 3.a.i, 3.a.iii (inserted) Table 15.3.5-4,  
Functions 1.b, 2.a, 2.b**

The CTS specifies the Total Number of Channels, the Number of Channels to Trip, and the Minimum Operable Channels. The STS specifies only the Required Channels which is equal to the total number of channels. For most functions, the ITS set the Required Channels equal to Total Number of Channels. For Functions listed above, the ITS specifies the CTS Minimum Operable Channels instead of the Total Number of Channels. **Comment:** The STS format is to use the total number of channels in the Required Channels column. Use of the CTS Minimum Operable Channels is inconsistent with the STS format. Use of Minimum Operable Channels for these functions while the Total Number of Channels is used for all other functions also creates an internal inconsistency in the ITS. Revise the ITS to use total number of channels. This will also require revision of the related ITS actions to be consistent with the condition of one channel inoperable and the STS. See comment 3.3.1-01.

Licensee Response:

**3.3.2-03 JFD 06  
ITS 3.3.2 Table 3.3.2-1 Function 5.b. Allowable Value**

The CTS provides no Trip Setpoint for the Steam Generator Water Level High function. The ITS also provides no Allowable Value for this function, contrary to the STS. **Comment:** The standard format requires that a Trip Setpoint and / or Allowable Value be provided for the function. Providing no setpoint is functionally equivalent to deleting the function, which is unacceptable. Provide the proper Trip Setpoint and / or Allowable Value consistent with the resolution of comment 3.3.2-01.

Licensee Response:

**3.3.2-04 DOC A5**

**ITS 3.3.2, Table 3.3.2-1, All Functions except 1.d and 1.e - Applicability**  
**CTS 15.3.5, Table 15.3.5-3, All Functions except 1.c and 1.d - Permissible Bypass Conditions, Table 15.3.5-4, All Functions - Permissible Bypass Conditions**

The CTS does not specify Permissible Bypass Conditions for any ESFAS functions except Low Steam Generator Pressure (1.c) and Low Pressurizer Pressure (1.d). The ITS adopts the less restrictive STS Applicability for these functions. **Comment:** This is a less restrictive change which is classified as "A". Reclassify change as "L".

Licensee Response:

**3.3.2-05 DOC L.2, M.9**

**ITS 3.3.2, Actions C, D, F**  
**CTS 15.3.5, Table 15.3.5-3, Table 15.3.5-4, Footnote \*\***

The CTS allows continued operation with one channel inoperable if the affected channel is placed in trip within one hour. The ITS actions adopt the STS requirement to place the channel in trip within 6 hours. **Comment:** The extended Completion Time in ITS Action D is justified in DOC L.2 based upon the analysis contained in WCAP-10271-P-A, Supplement 2. This is consistent with the basis for the STS. The Safety Evaluation Reports for WCAP-10271 require that applicants for the proposed Technical Specification changes for individual plants must confirm the applicability of the generic analysis of the WCAP. The applicability of the WCAP-10271 analysis to Point Beach has not been discussed. Adopting the WCAP as the basis for Completion Times is a technical change that should be the subject of a separate technical evaluation. Note that the extended Completion Time for ITS Actions C and F appear to have been selected to be consistent with the other Completion Times discussed in DOC L.2, although this is not stated in the related DOC, M.9. Revise ITS Completion Times to be consistent with the CTS.

Licensee Response:

**3.3.2-06 DOC L.1, M.9, M.3, JFD 1 (beyond-scope item 24, similar to beyond-scope item 7)**

**ITS 3.3.2, Action D, C, G - Note**  
**CTS 15.3.5, Table 15.3.5-3, Table 15.3.5-4, New Footnotes ##, ###**

The CTS does not allow taking an inoperable channel out of the tripped condition to allow surveillance testing of other channels. The ITS allows for this. The ITS modifies the STS provision that the inoperable channel may be placed in bypass.

This comment is a placeholder for beyond-scope item 24. It remains open pending technical branch disposition. In addition to technical branch comments, respond to the following:

The provision to allow taking the inoperable channel out of the tripped condition is justified in DOC L.1 based upon the analysis contained in WCAP-10271-P-A, Supplement 2. This is

consistent with the basis for the STS. The Safety Evaluation Reports for WCAP-10271 require that applicants for the proposed Technical Specification changes for individual plants must confirm the applicability of the generic analysis of the WCAP. The applicability of the WCAP-10271 analysis to Point Beach has not been discussed. Furthermore, the STS allowance is based upon a design which includes bypass provisions. The bypass function includes interlocks that prevent disabling one channel at a time. The basis for accepting the STS note allowing bypass in a design that lacks the STS-assumed protective interlocks has not been discussed. This is a technical change that should be the subject of a separate technical evaluation. Note that Actions C and G apply to functions with Automatic Actuation Logic that are not explicitly addressed in the CTS (Automatic Actuation Logic and AFW initiation on MFW trip). The application of the Note to Actions C and G is not discussed in DOC M.9 or M.3, but for Action C, the ITS Bases reference the WCAP. The Completion Times for Action G appear to have been selected to be consistent with the other completion times that are based upon the WCAP. Also note that the ITS Bases and JFD 1 indicate that the bypass referenced in the Note to Action C.1 does not exist in the Point Beach design. Delete the note allowing removal of inoperable channels from the tripped condition.

Licensee Response:

**3.3.2-07 DOC M.10 (beyond-scope item 98)**  
**JFD 44**  
**ITS 3.3.2, Table 3.3.2-1, Function 7**  
**CTS 15.3.5, Table 15.3.5-4, Insert 4**

The CTS does not include the Condensate Isolation function. This is added into the ITS.

This comment is a placeholder for beyond-scope item 98. It remains open pending technical branch disposition. In addition to technical branch comments, respond to the following:

Consider comments 3.3.2-05 and 3.3.2-06 in the review of this change to the CTS.

Licensee Response:

**3.3.2-08** not used

**3.3.2-09 DOC A.5, L.3, A.10**  
**ITS 3.3.2, Table 3.3.2-1, Surveillance Requirements**  
**CTS 15.4.1, Table 15.4.1-1, Functions 7, 8, 10, 11, 27, 44**

The CTS requires surveillance under all plant conditions. The ITS adopts the STS philosophy of requiring surveillance only in the specified Applicable Modes for each function.

**Comment:** These changes are classified as more administrative, however, based upon a literal reading of the CTS, they are indeed less restrictive. The DOCs do not discuss the reasons why these less restrictive changes are acceptable. Provide technical justification for the changes in the DOC.

Licensee Response:

**3.3.2-10 JFD 13**

**ITS 3.3.2, Table 3.3.2-1, Functions 1.b, 1.c, 1.d, 1.e, 2.b, 2.c, 3.b, 4.b, 4.c, 4.d, 4.e, 5.a, 5.b, 6.b, 7.a, 7.b, 8 - Surveillance Requirements**  
**CTS 3.3.2, Table 14.4.1-1, Functions 7, 8, 10, 27, 44 - Test**

The CTS and STS require quarterly functional testing of sense channels. The ITS does not require functional testing (SR 3.3.2.3), instead a Master Relay Test (SR 3.3.2.4) is required. The STS requires a Master Relay Test for logic and actuation channels, but the ITS specifies a COT. **Comment:** It appears that references to SR 3.3.2.3 and SR 3.3.2.4 have been reversed. A COT, not a Master Relay Test, is appropriate for sense channels. The Master Relay Test is appropriate for logic channels. In Table 3.3.2-1, specify SR 3.3.2.4 for logic channels and SR 3.3.2.3 for sense channels.

Licensee Response:

**3.3.2-11 No DOC**  
**ITS 3.3.2, SR 3.3.2.2 - Note**

The STS requires testing of the ESFAS Actuation Logic. The ITS adopts the STS note on this surveillance stating that the continuity check may be excluded. **Comment:** A basis for adopting the STS note has not been provided. Provide a DOC justifying the addition of the note to SR 3.3.2.2.

Licensee Response:

**3.3.3-01 DOC M.1**  
**ITS 3.3.3 Table 3.3.3-1, Function 24**  
**CTS 15.3.5, Table 13.3.5-5, Function 6**

The CTS specifies that there are 2 AFW flow channels and a minimum of 1 AFW flow channel required Operable. The STS requires 2 AFW flow channels to be operable. The ITS requires 1 channel/steam generator to be Operable. **Comment:** The ITS requirement may allow operation with only one flow channel, depending upon the arrangement of the AFW system. Adopt the STS requirement of two AFW flow channels.

Licensee Response:

**3.3.3-02 DOC L.4**  
**ITS 3.3.3 Table 3.3.3-1, Function 24**  
**CTS 15.3.5, Table 13.3.5-5, Function 6**

The CTS specifies that the plant be placed in hot shutdown if at least 1 AFW flow channel is not Operable. The ITS allows operation to continue indefinitely with no Operable AFW flow indication. DOC L.4 justifies this because AFW flow is a Category II backup indication.

**Comment:** If AFW flow is included in Table 3.3.3-1, it should be either Category I or Class A. If it is not Category I, then it must be a Class A variable. Therefore, it should be treated with equal importance as other PAM variables. Adopt the STS requirement to enter Condition F if no channels are operable.

Licensee Response:

**3.3.3-05 DOC A.5**  
**ITS 3.3.3, Surveillance Requirements**  
**CTS 15.4.1, Table 15.4.1-1, Plant Conditions When Required**

The CTS requires surveillance under all plant conditions. The ITS adopts the STS philosophy of requiring surveillance only in the specified Applicable Modes for each function.

**Comment:** These changes are classified as administrative, however, based upon a literal reading of the CTS, they are indeed less restrictive. Reclassify the change.

Licensee Response:

**3.3.3-06** not used

**3.3.3-07 JFD 3**  
**ITS 3.3.3, SR 3.3.3.3, Note**  
**CTS 15.4.1, Table 15.4.1, Function 25, Note 14**

The CTS includes a note that the high range radiation monitor calibration is a simple verification that the channel responds to a source. The ITS includes a note that calibration is not required. The ITS bases explain that verification of response to a source is required. **Comment:** The CTS requirement has not been clearly carried over to the ITS note. As stated, the requirement for calibration is ambiguous. SR 3.3.3.3 says that calibration is not required, the ITS Bases say that calibration is required, but it is a special kind of calibration. Retain the CTS wording in the Note on SR 3.3.3.3.

Licensee Response:

STS 3.3.4 has not been incorporated into the Point Beach ITS. ITS 3.3.4 equates to STS 3.3.5.

**3.3.5-01 DOC L.1**  
**ITS 3.3.4 Action A**  
**CTS 15.3.5, Table 13.3.5-3, Functions 4.a.i, 4.a.ii, 4.b.i, Footnote \*\***

The CTS allows continued operation with one channel inoperable if the affected channel is placed in trip within one hour. The ITS actions adopt the STS requirement to place the channel in trip within 6 hours. **Comment:** The extended Completion Time is justified in DOC L.2 based upon the analysis contained in WCAP-10271-P-A, Supplement 2. This is consistent with the basis for the STS. The Safety Evaluation Reports for WCAP-10271 require that applicants for the proposed Technical Specification changes for individual plants must confirm the applicability of the generic analysis of the WCAP. The applicability of the WCAP-10271 analysis to Point Beach has not been discussed. Adopting the WCAP as the basis for Completion Times is a technical change that should be the subject of a separate technical evaluation.

Licensee Response:

**3.3.5-02 DOC L.2**  
**ITS 3.3.4, Action A, Note**  
**CTS 15.3.5, Table 13.3.5-3, Functions 4.a.i, 4.a.ii, 4.b.i, Footnote ##**

The CTS does not allow taking an inoperable channel out of the tripped condition to allow surveillance testing of other channels. The ITS adopts the STS provision that allows bypass of an inoperable channel for up to 4 hours for surveillance testing. **Comment:** The provision to allow taking the inoperable channel out of the tripped condition is justified in DOC L.2 based upon the analysis contained in WCAP-10271-P-A, Supplement 2. This is consistent with the basis for the STS. The Safety Evaluation Reports for WCAP-10271 require that applicants for the proposed Technical Specification changes for individual plants must confirm the applicability of the generic analysis of the WCAP. The applicability of the WCAP-10271 analysis to Point Beach has not been discussed. This is a technical change that should be the subject of a separate technical evaluation. Delete the note allowing removal of inoperable channels from the tripped condition.

Licensee Response:

**3.3.5-03 DOC A.3**  
**ITS 3.3.4, Surveillance Requirements**  
**CTS 15.5.1, Table 15.5.1-1, Plant Conditions When Required**

The CTS requires surveillance under all plant conditions. The ITS adopts the STS philosophy of requiring surveillance only in the specified Applicable Modes for each function.

**Comment:** These changes are classified as administrative, however, based upon a literal reading of the CTS, they are indeed less restrictive. Reclassify the change.

Licensee Response:

**3.3.5-04 No DOC**  
**ITS 3.3.4, SR 3.3.4.3**  
**CTS 15.5.1, Table 15.5.1-1, Functions 9, 10, Setting Limit**

The trip settings (LSSS) in the CTS appear to be expressed at trip setpoints (see CTS bases). The ITS proposes to use Allowable Values instead. Furthermore, the STS format presumes the existence of a plant-specific setpoint analysis that sets the context for the form (i.e., allowable values, trip setpoints, or both) in which the LSSS are expressed in the ITS. In the absence of this analysis, the expression of the LSSS in the ITS cannot be unambiguously used to determine instrument operability from measurements of component errors. The Point Beach Allowable Values do not appear to be derived from such an analysis, as reference to setpoint analysis was deleted from the Bases, and numerical Allowable Values are not provided in the ITS for certain trip functions. **Comment:** This change is not discussed in a DOC and the plant-specific values do not appear to have been derived using a formal setpoint methodology. Provide justification for using Allowable Values instead of Trip Setpoints. Ensure that the values used are those that were calculated by the plant-specific setpoint analysis. Include a reference to the setpoint analysis in the Bases.

Licensee Response:

**3.3.5-05** not used

STS 3.3.6 has not been incorporated into the Point Beach ITS. ITS 3.3.6 equates to STS 3.3.9.

**3.3.7-01 No DOC**  
**ITS 3.3.5, Surveillance Requirements**  
**CTS 15.5.1, Table 15.5.1-1, Plant Conditions When Required**

The CTS requires surveillance under all plant conditions. The ITS adopts the STS philosophy of requiring surveillance only in the specified Applicable Modes for each function.

**Comment:** These changes are classified as administrative, however, based upon a literal reading of the CTS, they are indeed less restrictive. Reclassify the change.

Licensee Response:

**3.3.7-02 DOC M.1**  
**ITS 3.3.5, Table 3.3.5-1, Trip Setpoint**

No trip settings for the CREFS functions are given in the CTS. The ITS proposes to follow the STS approach of providing Trip Setpoints for these functions. For all other LCOs, the ITS proposes to use Allowable Values. Additionally, the STS format presumes the existence of a plant-specific setpoint analysis that sets the context for the form (i.e., allowable values, trip setpoints, or both) in which the trip settings are expressed in the ITS. In the absence of this analysis the expression of the settings in the ITS cannot be unambiguously used to determine instrument operability from measurements of component errors. The Point Beach Trip Setpoints do not appear to be derived from such an analysis, as reference to setpoint analysis was deleted from the Bases. **Comment:** This change is not discussed in the DOC and the plant-specific values do not appear to have been derived using a formal setpoint methodology.

Provide consistent expression of instrumentation trip settings within the ITS and provide justification for whichever form of expression is used (Allowable Values or Trip Setpoints). Ensure that the values used are those that were calculated by the plant-specific setpoint analysis. Include a reference to the setpoint analysis in the Bases.

Licensee Response:

**STS 3.3.8** has not been incorporated into the Point Beach ITS.

There are no comments on the conversion for STS 3.3.9 - ITS 3.3.6.