

February 1, 2001

Mr. Mark Reddemann
Site Vice President
Kewaunee and Point Beach Nuclear Power Plants
Nuclear Management Company, LLC
6610 Nuclear Road
Two Rivers, WI 54241

SUBJECT: KEWAUNEE NUCLEAR POWER PLANT - REQUEST FOR ADDITIONAL
INFORMATION RELATED TO PROPOSED AMENDMENT 165 FOR TECHNICAL
SPECIFICATIONS, CONTAINMENT ISOLATION (TAC NO. MA8017)

Dear Mr. Reddemann :

By letter dated January 13, 2000, Wisconsin Public Service Corporation (WPSC) submitted a proposed amendment to the Kewaunee Nuclear Plant (KNPP) Technical Specifications (TSs) to revise Section 3.6, "Containment." WPSC was succeeded by Nuclear Management Company, LLC (NMC), as the licensed operator of the KNPP. By letter dated October 5, 2000, NMC (the licensee) requested the Nuclear Regulatory Commission (NRC) staff continue to process and disposition licensing actions previously docketed and requested by WPSC.

The NRC staff finds that the additional information is needed. The request for additional information (RAI) questions were forwarded to Mr. G. Riste (NMC) via e-mail on March 23 and September 13, 2000, and faxed on January 26, 2001. A phone call was held on January 26, 2001, between the NRC staff and the NMC staff to discuss the questions to ensure that there was no misunderstanding. The Enclosure contains the additional information that the NRC staff needs.

Also, a phone call on January 30, 2001, established that February 16, 2001, would be a mutually agreeable response date.

Mr. M. Reddemann

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Please contact me at (301) 415-1446 if future circumstances should require a change in this response date.

Sincerely,

/RA/

John G. Lamb, Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-305

Enclosure: RAI

cc w/encls: See next page

Mr. M. Reddemann

- 2 -

Please contact me at (301) 415-1446 if future circumstances should require a change in this response date.

Sincerely,

/RA/

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REQUEST FOR ADDITIONAL INFORMATION REGARDING

KEWAUNEE TECHNICAL SPECIFICATION SECTION 3.6, "CONTAINMENT,"

(TAC NO. MA8017)

Kewaunee Nuclear Power Plant
Request for Additional Information
Containment Systems

1.0 Definitions

1. CTS 1.0.g
CTS 3.6.a, and 3.6.b
TS 3.6.a.1, 3.6.a.2, 3.6.b, 3.6.c, and 3.6.d

The markup of the Current Technical Specifications (CTS) shows that CTS 1.0.g "CONTAINMENT SYSTEM INTEGRITY" is deleted and that the phrase "CONTAINMENT SYSTEM INTEGRITY" in CTS 3.6.a and 3.6.b is changed to "Containment System Integrity" in the corresponding renumbered Technical Specification (TS) 3.6.a.1 and 3.6.d respectively. Furthermore, the new TS 3.6.a.2, 3.6.b, and 3.6.c uses the new terminology or phrase "When Containment System Integrity is required." The justifications provided for the deletion of CTS 1.0.g is that C.TS 1.0.g.1, 1.0.g.2, 1.0.g.3, and 1.0.g.4 are incorporated by the new TS 3.6.a.2, 3.6.b and 3.6.c. No specific justification is provided for the deletion of CTS 1.0.g.5 or 1.0.g.6; although it can be implied from the other justifications that these two items are incorporated by CTS 4.4 and CTS 3.6.b (new TS 3.6.d) respectively, and a general justification statement that the changes are consistent with NUREG - 1431, "Standard Technical Specifications (STS) Westinghouse Plants." While the staff finds the justifications for adding TS 3.6.a.2, 3.6.b and 3.6.c as related to CTS 1.0.g is acceptable, it finds the overall change with regards to the definition deletion unacceptable. The staff acknowledges that NUREG - 1431 does not include in STS 1.0 a definition for "CONTAINMENT SYSTEM INTEGRITY" or "CONTAINMENT INTEGRITY." However, in the development of NUREG - 1431 from NUREG - 0542, the old W-STs, the definition of "CONTAINMENT INTEGRITY" was relocated in STS entirety from the Definition Section (1.0) to the Bases for Containment (STS B3.6.1 Bases - BACKGROUND), and is used to define what constitutes an OPERABLE containment. Furthermore, the requirements in the definition with regards to containment airlocks and containment isolation valves are also relocated to their respective Bases and used to define what constitutes an OPERABLE airlock and containment isolation valve. In addition, the use of the phrases "Containment System Integrity shall not be violated..." or "Whenever/when Containment System Integrity is required..." is meaningless, since the term "Containment System Integrity" is not defined anywhere nor explained. **Comment:** Either retain the definition CTS 1.0.g "CONTAINMENT SYSTEM INTEGRITY" in CTS 1.0 or revise the "Basis" to define "Containment System Integrity," or what constitutes an OPERABLE containment, containment airlock, and containment isolation valve, and to be in conformance with the intent of NUREG - 1431, revise the LCOs in TS 3.6 to reflect the requirement that the containment is OPERABLE. Provide appropriate discussions and justifications for this change.

WPSC Response:

ENCLOSURE

3.6 Containment Systems

3.6.0-1 CTS 3.0.c

CTS 3.6

TS 3.6

The staff has reviewed the justifications provided for the changes in CTS 3.6, and finds that they are incomplete and unacceptable. The basic justification is that the changes are consistent with NUREG - 1431 Rev. 1. Consistency with the NUREG or standard is not a basis for acceptability. Based on the wording of the CTS, an inoperability of a containment system (containment, airlocks, equipment hatches, isolation valves, etc.) would require an immediate shutdown of the plant. Under the proposed TS this immediate shutdown is delayed for a period of time depending on the action and/or the inoperable component(s). In some cases the change is More Restrictive than the CTS requirements, while in others it is Less Restrictive. These changes need to be justified for Kewaunee. **Comment:** Except for the justification associated with the 24 hour allowed outage time (AOT) for containment isolation valves, provide additional discussion and justification for the propose TS changes. The 24 hour AOT for containment isolation valves is considered by the staff as a generic change and is being reviewed independent of this review.

WPSC Response:

3.6.a Containment

3.6.a-1 CTS 3.0.c

TS 3.6.a.1

TS 3.6.a.2

Based on the wording and structure of TS 3.6.a.2, it seems that TS 3.6.a.2 specifies the OPERABILITY and remedial actions for the reactor containment vessel and shield building equipment hatches only. It is unclear based on the justifications that state that the changes are consistent with NUREG - 1431, if the actions specified in TS 3.6.a.2.A are also supposed to apply to an inoperable reactor containment vessel or shield building. If the actions associated with TS 3.6.a.2.A are to apply to an inoperable reactor containment vessel or shield building, then TS 3.6.a.2.A needs to be revised. If not, do the actions associated with TS 3.6.a.1, i.e., CTS 3.0.c, apply? NUREG - 1431 does not contain a specific Action for inoperable equipment hatches, the Action for an inoperable equipment hatch is encompassed by the overall containment or shield building Actions for an inoperable containment (STS 3.6.1) or shield building (STS 3.6.19). In light of the discussion and request associated with RAI 1.0-1, it would seem that TS 3.6.a.2 is unnecessary. See RAI 3.6.a.2. **Comment:** Provide additional discussion and justification for this change. Revise the TS as appropriate. See RAIs 1.0-1 and 3.6.a-2.

WPSC Response:

3.6.a-2 CTS 1.0.g.2 and 1.0.g.6
CTS 3.6.a and 3.6.b.1
TS 3.6.a.1, 3.6.a.2, and 3.6.d.1
STS 3.6.19 and Associated Bases

Based on the wording of CTS 1.0.g.2, 1.0.g.6, 3.6.a, and 3.6.b.1 and TS 3.6.a.1, 3.6.a.2 and 3.6.d.1, it would seem that ACTIONS for an inoperable shield building would be those ACTIONS associated with an inoperable containment. NUREG - 1431 in STS 3.6.19 provides specific ACTIONS inoperable shield building and its associated equipment hatch/access openings which are less stringent than the ACTIONS associated with containment: Provide a discussion and justification as to why these less stringent requirements were not used for shield building inoperability and/or shield building equipment hatch inoperability in TS 3.6.a.2.A.

WPSC Reponse:

3.6.b Containment Air Locks

3.6.b-1 TS 3.6.b.2, 3.6.b.3, and Associated Basis
STS 3.6.2 ACTIONS and Associated Bases

The staff has reviewed the proposed remedial actions associated with an inoperable airlock(s), and finds that these proposed actions are not consistent with or meet the intent of the actions specified in STS 3.6.2 ACTIONS and its associated Bases. See RAIs 3.6.b-2, 3.6.b-3, 3.6.b-4, 3.6.b-5, 3.6.b-7, 3.6.b-8, and 3.6.b-9 for specific concerns with regards to TS 3.6.b.2, 3.6.b.3 and their associated Bases. **Comment:** Revise TS 3.6.b.2, 3.6.b.3 and their associated Bases to bring them into conformance with STS 3.6.2 ACTIONS and its associated Bases. See RAIs 3.6.b-2, 3.6.b-3, 3.6.b-4, 3.6.b-5, 3.6.b-7, 3.6.b-8, and 3.6.b-9.

WPSC Reponse:

3.6.b-2 TS 3.6.b.2.A and 3.6.b.2.B
STS 3.6.2 ACTION Note 2, ACTIONS A and B, and Associated Bases

TS 3.6.b.2.A and 3.6.b.2.B specify the remedial actions to be taken for an inoperable airlock door and an inoperable interlock mechanism. The introductory statements - "Both air locks may have one inoperable door if:" and "Both air locks may have an inoperable interlock mechanism if:" - conflict with the balance of the ACTION statements. These statements would only allow one air lock door or one interlock mechanism to be inoperable. However, the balance of the ACTIONS in TS 3.6.b.2.A.1, 3.6.b.2.A.2, 3.6.b.2.B.1 and 3.6.b.2.B.2 seem to imply that one could have one door in each airlock or both interlocks in both airlocks inoperable at the same time, which is consistent with the intent of the STS. In the STS the combination of STS 3.6.2 ACTION Note 2 and the wording of STS 3.6.2 CONDITIONS A and B allows for both air locks to have an inoperable door and how the actions are applied if more than one component is inoperable. Furthermore, in the TS as proposed, an inoperable door and an inoperable interlock mechanism would result in entry into TS 3.6.b.2.C, which is not the intent of the STS ACTIONS. **Comment:** Revise the introductory statements to TS 3.6.b.2.A and

3.6.b.2.B to be consistent with the wording associated with STS 3.6.2 ACTION Note 1 and Conditions A and B.

WPSC Response:

3.6.b-3 TS 3.6.b.2.A.2 and 3.6.b.2.B.2

STS 3.6.2 Required Action (RA) A.2, A.3, B.2, and B.3

Proposed TS 3.6.2.A.2 and 3.6.b.2.B.2 specifies that after the OPERABLE airlock door is verified closed in the affected airlock, “The OPERABLE door(s) is administratively controlled closed...” The terminology “administratively controlled closed” is undefined, and is not consistent with or meets the intent of the STS which specified in STS 3.6.2 RA A.2 and B.2 that the OPERABLE door(s) be locked closed. The basis for locking the door is that there is a low likelihood of a locked door being in misposition which would not be the case if it were just administratively controlled closed. In addition, in order to allow continued operation, the STS specifies in STS 3.6.2 RA A.3 and B.3 that the locked doors be verified locked closed on a 31 day frequency to assure that an acceptable containment leakage boundary is maintained. The proposed TS does not contain this requirement. See RAI 3.6.b-8 for an additional concern in this area.

Comment: Revise TS 3.6.b.2.A.2 and 3.6.b.2.B.2 to be consistent with the wording of STS 3.6.2 RA A.2 and B.2 respectively. Also, revise the submittal to add the requirements of STS 3.6.2 RA A.3 and B.3. Provide appropriate discussions and justifications for these changes. See RAI 3.6.b-8.

WPSC Response:

3.6.b-4 TS 3.6.b.2.A.2

STS 3.6.2 ACTION Note 1, RA A Note 2, and Associated Bases

TS 3.6.b.2.A.2 allows the OPERABLE door to be opened for entry and exit to repair the inoperable air lock component. This corresponds to STS 3.6.2 ACTION Note 1. See RAI 3.6.b-7 for additional concerns in this area. However, STS 3.6.2 RA A restricts this entry and exit if both airlocks are inoperable. This Note is needed to facilitate containment entry and exit to perform other TS surveillances, ACTIONS and/or repairs and is also necessary if repairs to the inoperable air lock doors must be made from inside containment. TS 3.6.b.2.A.2 as currently written would have an indefinite time limit. This is unacceptable. **Comment:** Revise TS 3.6.b.2.A.2 and associated Bases to more accurately reflect the Notes associated with STS 3.6.2 RA A. Provide any necessary discussion and justifications associated with this change. See RAI 3.6.b-7.

WPSC Response:

3.6.b-5 TS 3.6.b.3

STS 3.6.2 ACTION D

TS 3.6.b.3 states that if "...the OPERABILITY requirements of TS 3.6.b.2 are not met within the times specified, then within 1 hour initiate action to:" shutdown the plant within a certain time period. This is not consistent with the STS. In the STS if the Required Actions and associated Completion Times are not met, an immediate shutdown is started. One is not given an additional hour to prepare for a shutdown. It is assumed that sufficient time has been provided for in the previous Required Actions to either correct the problem or prepare for a shutdown. **Comment:** Revise proposed TS 3.6.b.3 and its associated Basis to delete the 1 hour time requirement to initiate action.

WPSC Response:

3.6.b-6 CTS 4.4

TS 3.6.b.2.B

STS SR 3.6.2.1, SR 3.6.2.2 and Associated Bases

STS 3.6.2 has two Surveillance Requirements (SR) associated with it. SR 3.6.2.1 which addresses airlock leakage and SR 3.6.2.2 which deals with the operability of the interlock mechanism. The corresponding CTS SR for STS SR 3.6.2.1 is CTS 4.4. However, the proposed amendment does not propose a corresponding SR for SR 3.6.2.2 even though they do propose an ACTION for an inoperable airlock interlock mechanism. **Comment:** Revise the proposed amendment to provide a SR that corresponds to STS SR 3.6.2.2 and its associated Bases as modified by TSTF-17 Rev. 1. Provide the necessary discussions and justifications for this change.

WPSC Response:

3.6.b-7 TS 3.6.b.2.A.2, 3.6.b.2.B.2 and Basis for 3.6.b

STS 3.6.2 ACTION Note 1 RA A Note 2, RA B Note 2 and Associated Bases

The first and third paragraphs of the Basis for TS 3.6.b provide a discussion on the exception to open the OPERABLE door(s) in an inoperable airlock. The discussion is based on, and uses the words in the Basis discussion in STS B3.6.2 for ACTION Note 1 and RA B Note 2. While the Basis discussion for TS 3.6.b.2.B.2 is acceptable, the Basis discussion associated with TS 3.6.b.2.A.2 is incomplete. See RAI 3.6.b-4 for one concern with STS RA A Note 2 and its associated Bases with regards to TS 3.6.b.A.2. The Bases for TS 3.6.b.2.A.2 uses virtually word- for- word the last half of the STS Bases descriptive paragraph for STS 3.6.2 ACTION Note 1 to describe this exception. The first part of this STS paragraph which provides a description of the preferred methods for air lock repair entry and exit is not used. The staff believes this is important information on how this Note is to be applied and therefore needs to be included in the Basis discussion. In addition, the second to last sentence in the Basis for TS 3.6.b.2.A.2 states the following: "After each entry and exit, the OPERABLE door must be closed." The STS wording is "must be immediately closed." The deletion of the word "immediately" is significant, in that it describes the time period associated with door

closure. The proposed TS does not. **Comment:** Revise the Basis discussion for TS 3.6.b.2.A.2 to accurately reflect the Bases discussion for STS B3.6.2 ACTION Note 1. See RAI 3.6.b-4.

WPSC Response:

3.6.b-8 TS 3.6.b.2 and Associated Basis

STS 3.6.2 RA A.3 Note, RA B.3 Note and Associated Bases

The second paragraph in the Bases for TS 3.6.b describes the verification of air lock door closure in high radiation areas. The proposed TS 3.6.b.2 does not contain an allowance to allow verification that the air lock door is locked closed by use of administrative controls or remote indications. Resolution of RAI 3.6.b-3 will address verification in high radiation areas. However, verification of the door being locked closed by administrative controls or remote indication is unacceptable. As stated in RAI 3.6.b-3 closure by administrative controls is unacceptable. In addition, the staff does not know how an air lock door can be verified locked closed by remote indications.

Comment: Revise the paragraph to reflect the STS wording. See RAI 3.6.b-3.

WPSC Response:

3.6.b-9 TS 3.6.b.2, 3.6.b.3 and Associated Basis

The Basis for TS 3.6.b provides a discussion on the purpose of the ACTIONS, and a justification for the AOTs, and the shutdown times associated with TS 3.6.b.2.C and 3.6.b.3. However, no discussion or justification except for the air lock door opening exceptions is provided on the purpose of the ACTIONS and for the AOTs associated with TS 3.6.b.2.A and 3.6.b.2.B. **Comment:** Revise the Bases for TS 3.6.b to include a discussion on the purpose and justification for the AOTs associated with TS 3.6.b.2.A and 3.6.b.2.B.

WPSC Response:

3.6.c Containment Isolation Valves

3.6.c-1 TS 3.6.c.2, 3.6.c.3 and Associated Basis

STS 3.6.3 ACTIONS and Associated Bases

The staff has reviewed the proposed remedial actions associated with inoperable containment isolation valves (CIV), and finds that the proposed actions are not consistent with or meet the intent of the ACTIONS specified in STS 3.6.3 ACTIONS and its associated Bases. See RAI 3.6.c-2, 3.6.c-3, 3.6.c-4, 3.6.c-5, 3.6.c-6, 3.6.c-8 and 3.6.c-9 for specific concerns with regards to TS 3.6.c.2, 3.6.c.3 and their associated Basis. **Comment:** Revise TS 3.6.c.2, 3.6.c.3 and their associated Basis to bring them into conformance with STS 3.6.3 ACTIONS and its associated Basis. See RAI 3.6.c-2, 3.6.c-3, 3.6.c-4, 3.6.c-5, 3.6.c-6, 3.6.c-8 and 3.6.c-9.

WPSC Response:

3.6.c-2 CTS 3.0.c

TS 3.6.c.2.A, 3.6.c.2.B and Associated Basis

STS 3.6.3 ACTION Note 2, ACTIONS A and B, and Associated Bases

TS 3.6.c.2.A and 3.6.c.2.B specify the remedial actions to be taken for one or two inoperable CIVs in a penetration. The introductory statements - "With one containment isolation valve in a penetration inoperable:" and ""With two containment isolation valves in a penetration inoperable:" - conflict with the balance of the ACTION statements and the Basis discussion. These statements would only allow one penetration to be inoperable at a time. However, the balance of the ACTION in TS 3.6.c.2.A and the associated Basis discussion seem to imply that one could have more than one penetration inoperable at the same time, which is consistent with the intent of the STS. In the STS the combination of STS 3.6.3 ACTION Note 2 and the wording of STS 3.6.3 CONDITIONS A and B allows for more than one penetration to be inoperable. In the TS as proposed, more than one inoperable penetration could result in entry into CTS 3.0.c which is not the intent of the STS ACTIONS. **Comment:** Revise the introductory statements to TS 3.6.c.2.A and 3.6.c.2.B to be consistent with the wording associated with STS 3.6.3 ACTION Note 1, and CONDITIONS A and B.

WPSC Reponse:

3.6.c-3 TS 3.6.c.A.1

STS 3.6.3 ACTION C and Associated Bases

TS 3.6.c.2.A.1 requires that a penetration with an inoperable CIV be isolated with 24 hours using one of a number of isolation devices, one of which may be a check valve with the flow through the valve secured. TS 3.6.c.2.A.1 also contains an exception with regards to the check valve which states that "A check valve shall not be used for flow path isolation if the affected penetration has only one containment isolation valve." The staff has two problems with this statement. In the STS the corresponding ACTION with regards to penetrations with one CIV is STS 3.6.3 ACTION C. In NUREG-1431 ACTION C applies to penetrations with only one CIV and a closed system. The staff cannot determine if the penetrations at Kewaunee with only one CIV are in closed systems (10 CFR 50 Appendix A GDC 57) or open systems. If all these penetrations are in closed systems, then the ACTION is acceptable including the 24 hour AOT. Since TSTF-30 modified the Completion Time in STS 3.6.3 ACTION C from 4 hours to 72 hours for this situation, the 24 hour AOT is acceptable for these penetrations only. The only change that would be needed would be to clarify that the penetration is in a closed system. However, if one or more of these penetrations are in an open system, then the 24 hour AOT is unacceptable. TSTF-30 Rev. 3 makes a distinction between penetrations with only one CIV in a closed system and an open system. The distinction is that for a closed system a 72 hour Completion Time is allowed for isolation while only 4 hours is allowed for isolation in an open system. These changes were made to NUREGs-1433 and 1434 (BWR/4 and BWR/6 respectively) since these types of systems were present in those designs. If this type of penetration/system design is present at Kewaunee then the AOT must be modified to reflect the various types of penetration/systems. Consideration should be given to providing a separation ACTION

for these types of penetrations/systems to take advantage of the longer AOT.

Comment: Revise TS 3.6.c.2.A.1 and associated Basis to reflect the above discussion with regards to STS 3.6.3 ACTION C as modified by TSTF-30 Rev. 3

WPSC Response:

3.6.c-4 TS 3.6.c.2.A.2.b, 3.6.c.2.B.2.b and Associated Basis
STS 3.6.3 RA A.2

TS 3.6.c.2.A.2.b and 3.b.c.2.B.2.b specify that the affected penetration shall be verified to be isolated prior to entering INTERMEDIATE SHUTDOWN from COLD SHUTDOWN for isolation devices inside containment. This is not consistent with the STS which requires the verification frequency for isolation device inside containment to be prior to entering MODE 4 from MODE 5 if not performed within the previous 92 days. The frequency of “if not performed within the previous 92 days” has not been included. No justification is provided this omission, which could be considered to be a generic change. The frequency is needed to ensure that isolation device misalignment is an unlikely possibility. **Comment:** Revise TS 3.6.c.2.A.2.b, 3.6.c.2.b.2.b and the associated Basis to reflect the STS requirement to verify isolation prior to entering INTERMEDIATE SHUTDOWN from COLD SHUTDOWN if not performed within the previous 92 days.

WPSC Response:

3.6.c-5 TS 3.6.c.2.C
STS 3.6.3 ACTION Note 1, and Associated Bases

STS 3.6.3 ACTION Note 1 allows penetration flow paths to be unisolated intermittently under administrative controls. The associated Bases for STS 3.6.3 ACTION Note 1 describes what constitutes “under administrative controls.” The proposed TS change combines STS 3.6.3 ACTION Note 1 and its associated Bases into TS 3.6.c.2.C. However, the proposed TS makes two changes which changes the intent of STS 3.6.3 ACTION Note 1. TS 3.6.c.2.C limited only to those flow paths with inoperable CIVs. The intent of the STS Note is to allow any closed CIV except certain purge valves to be opened under administrative controls and not restrict it to just those valves closed as a result of Required Actions. In addition, the Note prevents unnecessary entry into the ACTION statements when a normally closed valve is opened. The second change deletes the word “intermittently.” By deleting this word, TS 3.6.c.2.C allows the closed valve to remain open indefinitely, which was not the intent of the STS Note. **Comment:** Revise TS 3.6.c.2.C to bring it into conformance with STS 3.6.3 ACTION Note 1 and its Associated Bases.

WPSC Response:

3.6.c-6 TS 3.6.c.3

STS 3.6.2 ACTION D

TS 3.6.c.3 states that if "...the OPERABILITY requirements of TS 3.6.c.2 are not met within the times specified, then within 1 hour initiate action to:" shutdown the plant within a certain time period. This is not consistent with the STS. In the STS if the Required Actions and associated Completion Times are not met, an immediate shutdown is started. One is not given an additional hour to prepare for a shutdown. It is assumed that sufficient time has been provided for in the previous Required Actions to either correct the problem or prepare for a shutdown. **Comment:** Revise proposed TS 3.6.c.3 to delete the 1 hour time requirement to initiate action.

WPSC Response:

3.6.c-7 CTS 1.0.g.1 and 1.0.g.4

TS 3.6.c.1

STS SR 3.6.3.1 through 3.6.3.11 and Associated Bases

STS 3.6.3 has a number of SRs associated with it to verify CIV OPERABILITY. The CTS through CTS 1.0.g describes what constitutes an OPERABLE CIV. The proposed TS specify that the CIVs be OPERABLE and provide proposed ACTIONS for inoperable CIVs, but do not propose corresponding SRs to verify CIV OPERABILITY. As a minimum, the staff believes that STS SR 3.6.3.1 and/or 2, 3.6.3.3, 3.6.3.4, 3.6.3.5 and 3.6.3.8 should be in the proposed TS amendment. **Comment:** Revise the proposed amendment to provide the appropriate SRs to verify CIV OPERABILITY, or provide appropriate discussions and justifications as to why they should not be included.

WPSC Response:

3.6.c-8 TS 3.6.c.2 and Associated Basis

STS 3.6.3 RA A.2 Note, RA C.2 Note and Associated Bases

The third paragraph in the Basis for TS 3.6.c describes the verification of isolation device closure in high radiation areas. The proposed TS 3.6.c.2 does not contain an allowance to allow verification that the penetration is closed/isolated by use of administrative means. **Comment:** Revise TS 3.b.c.2 to allow penetrations in high radiation areas to be verified isolated by administrative means. Provide the necessary discussions and justification for this change.

WPSC Response:

3.6.c-9 TS 3.6.c.2, 3.6.c.3 and Associated Basis

The Basis for TS 3.6.c provides a discussion on the purpose the ACTION and a justification for the AOTs for TS 3.6.c.2.A. However, no discussion or justification is provided on the purpose of the ACTIONS and Notes and for the AOTs associated with TS 3.6.c.2.B, 3.6.c.2.C, and 3.6.c.3. **Comment:** Revise the Basis for TS 3.6.c to include a discussion on the purpose of the ACTIONS and justification for the AOTs associated with TS 3.6.c.2.B, 3.6.c.2.C and 3.6.c.3.

WPSC Response:

PROBABILISTIC RISK ASSESSMENT

1. What is the algorithm for large early release frequency (LERF), ICLERP?
2. Does Criterion 1 or do all of the Criterion 2A and 2B cover the following penetration flow paths:

CIVs in penetrations connected to safety injection check valve leakage path.
CIVs in penetrations connected to the reactor coolant system sample line.
CIVs in penetrations connected to letdown or reactor coolant pump bleedoff line.
CIVs in penetrations connected to non-essential containment cooling.
CIVs in penetrations used to support RCS inventory control safety function under accident condition.
CIVs in penetrations used to support containment heat removal function using containment sprays.
CIVs in penetrations used to support containment heat removal function using fan coolers.

To ensure that specific probabilistic risk assessment (PRAs) are adequate to support the requested TS changes, the staff will require each licensee to furnish, in its submittal, information on PRA quality, including:

Verification that the PRA reflects the as-built, as-operated plant.

Updates of the PRA since the last review cycle, including corrections of weaknesses identified by past reviews.

Details of their peer review process, a summary of the peer review findings, and a discussion of the independence of internal reviews/reviewers.

Description of PRA quality assurance methods.

Results of reviews of pertinent accident sequences and cut sets for modeling adequacy and completeness (with respect to this application).