

June 1, 2001

Mr. Joel Sorensen
Site General Manager
Prairie Island Nuclear Generating Plant
Nuclear Management Company, LLC
1717 Wakonade Drive East
Welch, MN 55089

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION REGARDING THE APPLICATION FOR CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS, SECTION 3.6 (TAC NOS. MB0695 AND MB0696)

Dear Mr. Sorensen:

By a letter dated December 11, 2000, as supplemented by a letter dated March 6, 2001, Nuclear Management Company, LLC, submitted a license amendment request to convert the current technical specifications for the Prairie Island Nuclear Generating Plant to improved technical specifications.

Enclosed are the Nuclear Regulatory Commission staff's request for additional information (RAI) on Section 3.6, "Containment Systems," of the subject improved technical specifications submittal. The enclosed RAI, has been previously forwarded to Mr. Dale Vincent of your staff to facilitate any questions or clarifications on the RAI. Mr. Vincent has recently informed me that he has reviewed the draft RAI and is prepared to respond to the RAI within 60 days from the date of this letter.

Please let me know if you have any questions regarding this RAI.

Sincerely,

/RA/

Tae Kim, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-282 and 50-306

Enclosure: As Stated

cc w/encl: See next page

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1717 Wakonade Drive East
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ACCESSION NO. ML011520167

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Prairie Island Nuclear Generating Plant,
Units 1 and 2

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May 2001

**Prairie Island Nuclear Generating Plant
Improved TS Section 3.6, Containment Systems
Request for Additional Information**

3.6.0 General

3.6.0-1 CTS 1.0
CTS 3.3
CTS 3.6
CTS 4.4
CTS 4.5
CTS Table 3.5.-1
CTS Table 4.1-1C
CTS Table 4.1-2B

In converting the above CTS sections and tables to the ITS numerous reformatting, renumbering, and editorial rewording changes were made. In addition, certain wording preferences and/or English language conventions were adopted, which resulted in the ITS being more readily readable and therefore understandable by the plant operators and users. These changes did not result in any technical changes, but are considered to be Administrative changes. No discussion or justification was provided for these Administrative changes. The letter dated December 11, 2000, submitted with the conversion submittal states (in Attachment 1) that the Administrative changes DOC "A" is used to cover this general change. This general Administrative change is also applicable to the other CTS/ITS sections. **Comment:** Provide the appropriate discussion and justification for these Administrative changes.

NMC Response:

3.6.0-2 DOC M3.6-52
JFD X3.6-108
JFD CL3.6-141
JFD CL 3.6-181
CTS 4.0.A.2.
CTS 4.4.B.3.c
CTS 4.4.E
CTS 4.4.F
CTS 4.4.I.a, b, and c
CTS 4.5.A.2.a
CTS 4.5.A.3
CTS 4.5.B.3.d
CTS 4.5.B.3.f
CTS Table 4.1-1c, Item 10
ITS SRs 3.0.2, 3.6.2.2, 3.6.3.7, 3.6.5.3, 3.6.5.5, 3.6.5.6, 3.6.5.7, 3.6.6.4,
3.6.7.1, 3.6.7.2, 3.6.7.3, 3.6.8.2, 3.6.9.3, 3.6.9.4, and Associated Bases

The frequencies for performing the above CTS surveillances are specified as "at least once per operating cycle or once each 18 months, whichever comes first "or" during each refueling shutdown." The ITS markup specifies the frequencies for the corresponding ITS SRs as 24 months. CTS 4.0.A.2 specifies that the SR frequency

“refueling shutdown” shall not exceed 24 months. A similar change has been made in ITS SR 3.0.2 which specifies that the 25% SR frequency allowance does not apply to the 24 month frequency. Except for the frequency changes associated with CTS 4.4.B.3.c/ITS SR 3.6.9.3, and CTS 4.5.B.3.d/ITS SR 3.6.6.4 (See Comment Numbers 3.6.6.-2 and 3.6.9-4), the ITS SR frequency of 24 months maximum seems to be acceptable and no changes to the CTS/ITS markup would be required. However, a discrepancy and/or concern arises with regards to the information contained in Attachment 3 “Existing and Future License Amendment Requests (LARs) to be incorporated into the PI ITS” and Attachment 5 “Beyond Scope Changes” of the December 11, 2000, Conversion submittal letter. Both attachments state that the 18 month refueling cycles are to be extended to 24 months. The wording in these two attachments implies to the staff that current 18 month refueling cycle with its current CTS 4.0.A.2/ITS SR 3.0.2 extended SR frequency allowance of up to 24 months maximum is being changed to a 24 month refueling cycle with an extended SR frequency allowance of 30 months (1.25%) per the requirements of Generic Letter 91-04 “Guidance on Preparation of a Licensee Amendment Request for Changes in Surveillance Intervals to Accommodate a 24 Month Fuel Cycle.” If the proposed change is to change specified CTS 18 month frequencies with a current 1.25% extension to 18 month frequencies with an extension to a 24 month maximum, then the listing of Associated DOCs and JFDs is incomplete. The listing as it pertains to Section 3.6 should be revised to include DOC M3.6-52 and JFD CL 3.6-141. The listing may have to be revised for other sections. If, however, the proposed change is a Generic Letter 91-04 change as described above, then not only does the listing of associated DOCs and JFDs need to be revised to include DOC M3.6-52, JFD CL3.6-141 and JFD CL 3.6-181, but a new Less Restrictive (L) change needs to be added to the CTS markup. This new Less Restrictive (L) change needs as a minimum to state that an amendment will be, or has been submitted to change the refueling cycle frequency and those CTS SRs which are affected need to be marked with this “L” DOC. This would apply to all sections, not just Section 3.6. See Comment Numbers 3.6.2-4, 3.6.3-12, 3.6.5-5, 3.6.6-3, 3.6.7-2, 3.6.8-7, and 3.6.9-5. **Comment:** Provide clarification as to the meaning of the refueling cycle change in Attachments 3 and 5, and revise the Attachments and CTS/ITS markup as appropriate. See Comment Number 3.6.2-4, 3.6.3-12, 3.6.5-5, 3.6.6-3, 3.6.7-2, 3.6.8-7, 3.6.9-4, and 3.6.9-5.

NMC Response:

3.6.1 Containment

- 3.6.1-1 DOC A 3.6-3
- DOC A3.6-11
- JFD CL 3.6-103
- JFD CL 3.6-104
- CTS 3.6.J
- CTS 3.6.K
- CTS 4.4.G
- CTS 4.4.H
- ITS 3.6.1 Actions, SR 3.6.1.2, SR 3.6.1.3 and Associated Bases

CTS 3.6.J and 3.6.K, specify the temperature limits for the containment and the actions

to be taken when these limits are exceeded. Even though CTS 4.4.G and 4.4.H only require the temperature limits to be verified prior to entering MODE 4 from MODE 5, the operator is responsible for ensuring that the temperature limits are not exceeded when the plant is in MODES 1, 2, 3 or 4. If the limits are exceeded anytime the plant is in MODES 1, 2, 3, or 4 then the Actions of CTS 3.6.J.2 and 3.6.K.2 are entered. These Actions allow 8 hours to restore the temperature limits before a shutdown is required. In the ITS only one hour is allowed to restore temperature limits prior to a shutdown. This More Restrictive change has not been justified. Note: Resolution of this concern will depend on the resolution of Comment Numbers 3.6.1-2 and S3.6.5A-1. **Response:** Revise the CTS markup and provide the appropriate discussion and justification for this More Restrictive change. See Comment Numbers 3.6.1-2 and S3.6.5A-1.

NMC Response:

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- | | |
|---------|---|
| 3.6.1-2 | DOC A 3.6.-3
DOC A 3.6-11
JFD CL 3.6-103
JFD CL 3.6-104
CTS 3.6.J
CTS 3.6.K
CTS 4.4.G
CTS 4.4.H
ITS SR 3.6.1.2, SR 3.6.1.3 and Associated Bases |
|---------|---|

CTS 3.6.J and 3.6.K specify the temperature limits for the containment and containment shell and the actions to be taken when these limits are exceeded. CTS 4.4.G and 4.4.H specify the frequency used to verify these temperature limits. These specifications are incorporated into ITS 3.6.1 as ITS SR 3.6.1.2 and SR 3.6.1.3 respectively. This change deviates from the STS (NUREG -1431) in that the temperature specifications are incorporated into the containment LCO rather than as a separate LCO. Insufficient justification is provided to justify this deviated from the Standard and the change could be considered as a generic change. See Comment Number S3.6.5A-1. **Comment:** Delete this change. See Comment Number S3.6.5A-1.

NMC Response:

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- | | |
|---------|--|
| 3.6.1-3 | DOC LR 3.6-1
CTS 1.0 "CONTAINMENT INTEGRITY"
ITS 3.6.1, 3.6.2, 3.6.3, and Associated Bases |
|---------|--|

CTS 1.0 defines "CONTAINMENT INTEGRITY". A markup of CTS 1.0 "CONTAINMENT INTEGRITY": provided in CTS 3.6 shows that the requirements are relocated to ITS B3.6.1 Bases and the relocation is justified by DOC LR 3.6.-1. While this change may be acceptable for the entire definition (See Comment Number 3.6.1-4), certain parts also have an Administrative change associated with it. The Administrative changes deal with the requirements of the definition being used as the basis for certain SRs in ITS 3.6.1, 3.6.2 and 3.6.3. CTS 1.0 "CONTAINMENT INTEGRITY" Item 1 is the basis for ITS SR 3.6.3.1, SR 3.6.3.2, SR 3.6.3.3, SR 3.6.3.4, 3.6.3.5, and 3.6.3.8; Item 3

is the basis for ITS 3.6.2 and and Item 4 is the basis for ITS SR 3.6.1.1 and SR 3.6.2.1. See Comment Numbers 3.6.2-6 and 3.6.3-5. **Comment:** Revise the CTS markup and provide the appropriate discussion and justification for these Administrative changes. See Comment Numbers 3.6.1-4, 3.6.2-6 and 3.6.3-5.

NMC Response:

3.6.1-4 DOC LR 3.6-1
 CTS 1.0 "CONTAINMENT INTEGRITY" Item 2
 ITS B3.6.1 Bases - BACKGROUND

CTS 1.0 defines CONTAINMENT INTEGRITY. A markup of CTS 1.0 is provided in the CTS markup of CTS 3.6. DOC LR 3.6.-1 states that the definition of CONTAINMENT INTEGRITY is deleted from the CTS/ITS and that the definition requirements have been relocated to the Bases for ITS 3.6.1. This justification is incorrect. CTS 1.0 "CONTAINMENT INTEGRITY" Item 2 states that "All equipment hatches are closed and sealed." ITS B3.6.1 Bases - BACKGROUND states the following: "To maintain this leak tight barrier:c. All equipment hatches are closed." The requirement for sealing the equipment hatches has been deleted. No justification is provided for this Less Restrictive change. **Comment:** Provide a discussion and justification for this Less Restrictive change.

NMC Response:

3.6.1-5 JFD CL 3.6-102
 CTS 4.4.A
 STS SR 3.6.1.1
 ITS SR 3.6.1.1 and Associated Bases

CTS 4.4.A requires leak rate testing in accordance with the Containment Leak Rate Testing Program which is based on the requirements of 10 CFR 50 Appendix J, Option B. STS SR 3.6.1.1 requires the visual examination and leakage rate testing be performed in accordance with 10 CFR 50 Appendix J as modified by approved exemptions. ITS SR 3.6.1.1 modifies STS SR 3.6.1.1 to conform to CTS 4.4.A as modified in the CTS markup. The STS is based on Appendix J, Option A while the CTS and ITS are based on Appendix J, Option B. Changes to the STS with regards to Option A versus Option B are covered by TSTF-52, Rev. 3. The changes to ITS 3.6.1., 3.6.2, 3.6.3, are in conformance with TSTF-52 Rev. 3; however, the Bases for ITS 3.6.1 and 3.6.2 are not in conformance with TSTF-52. See Comment Number 3.6.2-7. **Comment:** Licensee should revise its submittal to conform to the TSTF-52, Rev. 3. See Comment Numbers 3.6.2-7.

NMC Response:

3.6.1-6 STS B3.6.1 Bases - SR 3.6.1.1
 ITS B3.6.1 Bases - SR 3.6.1.1

STS B3.6.1 Bases - SR 3.6.1.1 states that failure to meet various leakage limits

specified in LCO 3.6.2 and LCO 3.6.3 does not necessarily invalidate the limits of the Type A, B and C leakage tests. One of the items listed in this Bases is purge valves with resilient seals. ITS B3.6.1 Bases - SR 3.6.1.1 deletes the reference to purge valves with resilient seals. No justification is provided for this deletion. However, since ITS 3.6.3 contains an SR on purge valves with resilient seal leakage, the staff believes that the reference to purge valves in ITS B3.6.1 Bases - SR 3.6.1.1 should be retained.

Comment: Delete this change.

NMC Response:

3.6.2 Containment Air Locks

3.6.2-1 DOC A3.6-47
 CTS 3.6.M.2
 CTS 3.6.M.3
 ITS 3.6.2 ACTION B and Associated Bases

CTS 3.6.M.2 specifies the actions to be taken for an inoperable airlock door. CTS 3.6.M.2 is modified in the CTS markup by the addition of ITS 3.6.2 ACTION B for an inoperable interlock and this change is justified by DOC A3.6-47. The justification is incorrect. CTS 3.6.M.2 only applies if an airlock door is inoperable. If the air lock interlock mechanism is inoperable, the entire airlock is inoperable, therefore the correct CTS ACTION to enter is CTS 3.6.M.3. In order to convert the CTS to the ITS for this condition, CTS 3.6.M.3 must be modified and the changes associated with that modification (restore to OPERABLE status or shutdown to verify closed, locked periodically verify locked closed, and the associated Notes) are Less Restrictive.

Comment: Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.

NMC Response:

3.6.2-2 DOC M3.6-42
 CTS 3.0.C
 CTS 3.6.M
 CTS 3.6.M.2
 CTS 3.6.M.3
 ITS 3.6.2 ACTION Notes 2 and Associated Bases

CTS 3.6.M. is modified by DOC M3.6-42 which adds ITS 3.6.2 ACTION Notes 2 and 3. This justification is incorrect for Note 2. ITS 3.6.2 ACTION Note 2 allows separate condition entry for each airlock. In the CTS with one airlock door inoperable, CTS 3.6.M.2 is entered. If an airlock door in the other airlock becomes inoperable, based on the CTS wording, CTS 3.0.C is entered which requires an immediate shutdown. ITS 3.6.2 ACTION Note 2 would allow CTS 3.6.M.2 (ITS 3.6.2 ACTION A) to be reentered for the other inoperable door. The same reasoning would apply to CTS 3.6.M.3. Thus the change is not More Restrictive but is a Less Restrictive (L) change (immediate shutdown not required). **Comment:** Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.

NMC Response:

3.6.2-3 DOC M3.6-42
 CTS 3.6.M
 ITS 3.6.2 ACTION Note 3 and Associated Bases

CTS 3.6.M is modified by DOC M3.6-42 which adds ITS 3.6.2 ACTION Notes 2 and 3. This justification is incorrect for Note 3. ITS 3.6.2 Action Note 3 provides the mechanism in the STS/ITS format to cascade to other relevant technical specifications. The CTS by its format and structure requires cascading. Thus the addition of ITS 3.6.2 ACTION Note 3 is an Administrative change rather than a More Restrictive change.

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

NMC Response:

3.6.2-4 DOC M3.6-52
 JFD TA 3.6-107
 JFD X3.6-108
 STS SR 3.6.2.2
 ITS SR 3.6.2.2 and Associated Bases

STS SR 3.6.2.2 requires verifying only one door in the air lock will open at a time at six months intervals. The interval is modified in ITS SR 3.6.2.2 from 6 months to 24 months. This modification is in accordance with TSTF-17 Rev. 2; however, the Bases changes are not in accordance with TSTF-17 Rev. 2, but in accordance with TSTF 17 Rev 1. Also, see Comment Number 3.6.0-2. **Comment:** Revise the ITS Bases to be in accordance with TSTF-17 Rev. 2 or justify the deviations. See Comment Number 3.6.0-2.

NMC Response:

3.6.2-5 DOC M3.6-52
 JFD X3,6-108
 CTS 3.6.M
 STS SR 3.6.2.2
 ITS SR 3.6.2.2

CTS 3.6.M has been modified to add ITS SR 3.6.2 2 and is justified by DOC M3.6-52 and JFD X 3.6-108. ITS SR 3.6.2.2 differs from STS SR 3.6.2.2 by the substitution of the word “each” for “the”. No justification for this change is provided. Furthermore, this change can be considered as a generic change which is beyond the scope of review for this conversion. **Comment:** Delete this generic change.

NMC Response:

3.6.2-6 DOC LR 3.6-1
 CTS 1.0 “CONTAINMENT INTEGRITY” Item 3

ITS 3.6.2 and Associated Bases

See Comment Number 3.6.1-3. **Comment:** See Comment Number 3.6.1-3.

NMC Response:

3.6.2-7 JFD CL 3.6-102
ITS B3.6.2 Bases - LCO and REFERENCES

See Comment Number 3.6.1-5. **Comment:** See Comment Number 3.6.1-5.

NMC Response:

3.6.2-8 JFD CL 3.6-194
JFD PA 3.6-201
STS B3.6.2 Bases - BACKGROUND
ITS B3.6.2 Bases - BACKGROUND and A.1, A.2 and A.3

STS B3.6.2 Bases - BACKGROUND states in the last sentence of the third paragraph the following: "Additionally, control room indication is provided to alert the operator whenever an airlock door interlock mechanism is defeated." ITS B3.6.2 Bases - BACKGROUND deletes this statement using JFD CL 3.6-194 which states that no such alarm is provided in the Prairie Island control room. This deletion would probably be acceptable except for a change made in ITS B3.6.2 Bases - A.1, A.2 and A.3. That change designated JFD PA 3.6-201 allows verification of the air lock door closure by using the control board alarm status for the airlock doors. Insufficient information is provided in JFD PA 3.6-201 as to what is actually alarmed to make a determination as to the acceptability of these two related changes. If each airlock door has its own separate alarm then the interlock statement in the BACKGROUND section should not have been deleted since the alarm indication showing both airlock's doors open would indicate an inoperable/defeated interlock mechanism. In this case, the change associated with JFD PA 3.6-201 would be acceptable. However, if the control room alarm status for the air lock doors only indicates that a door is open but not which door, then the deletion of the interlock statement in the BACKGROUND section is acceptable. In this case the change associated with JFD PA 3.6-201 would not be acceptable since one could not verify that the OPERABLE air lock door is closed as required by ITS 3.6.2 Required Action A.1. **Comment:** Provide additional discussion and justification on the control board alarm status for the airlock door. The discussion should describe what is alarmed, to what does it apply, and its relationship to indicating interlock mechanism inoperability.

NMC Response:

3.6.2-9 CTS 4.4.A.2
ITS SR 3.6.2.1 Notes 1 and 2 and Associated Bases

CTS 4.4.A.2 specifies the requirements for the containment airlock leakage tests. The corresponding ITS SR is its SR 3.6.2.1. ITS SR 3.6.2.1 has two Notes associated with

it. The CTS does not show these Notes nor is it marked up to show the addition of these Notes. Depending on a number of factors the addition of these Notes could be considered as Administrative or Less Restrictive (L) changes to the CTS. **Comment:** Revise the CTS markup and provide the appropriate discussions and justifications for the addition of these Notes to CTS 4.4.A.2.

NMC Response:

3.6.2-10 CTS 3.6.M.2
 CTS 3.6.M.3
 ITS 3.6.2 Required Actions A Note 1, Required Action B Note 1 and
 Associated Bases

CTS 3.6.M.2 and 3.6.M.3 specify the actions to be taken for an inoperable air lock door and air lock interlock mechanism (See Comment 3.6.2-1), respectively. The corresponding ITS ACTIONS are ITS 3.6.2 ACTION A and ACTION B, respectively. Both of these ITS ACTIONS have a similar Note in the Required Actions column. This Note (Note 1) directs the operator to the correct ACTION/Condition based on the inoperability. The CTS markup does not show this Note nor justifies its existence in the ITS. **Comment:** Revise the CTS markup and provide a discussion and justification for the addition of Required Action Note 1 to ITS 3.6.2 Actions A and B.

NMC Response:

3.6.3 Containment Isolation Valves

3.6.3-1 DOC A3.6-23
 DOC M3.6-32
 DOC L3.6-33
 JFD PA 3.6-116
 CTS 3.6.C.3
 STS 3.6.3 Condition A, B and C Note and Associated Bases (NUREG 1431)
 STS 3.6.1.3 ACTION C and Associated Bases (NUREG 1433)
 ITS LCO 3.0.3
 ITS 3.6.3 Condition A, B, and C Note, ACTION C and Associated Bases

CTS 3.6.C.3 specifies the actions to be taken for inoperable containment isolation valves. CTS 3.6.C.3 has been modified in the CTS markup by the addition of a Note defining the applicability of the ACTION to the specific type of penetration. In addition, CTS 3.6.C.3 has been modified by the addition of ITS ACTIONS B and C. Each of these additions has a similar Note. STS 3.6.3 Conditions A, B, and C have Notes which define the applicability of the ACTION to the specific type of penetration. The STS Note for STS 3.6.3 Condition A and B states that the Condition is "Only applicable to penetration flow paths with two containment isolation valves." The STS Note for STS 3.6.3 Condition C states that the Condition is "Only applicable to penetration flow paths with only one containment isolation valve and a closed system." The CTS/ITS markup changes these Notes as follows for ITS 3.6.3 Conditions A and B the Note states "Only applicable to penetration flow paths which do not use a closed system as a containment isolation boundary" and for ITS 3.6.3 Condition C the Note states "Only applicable to

penetration flow paths which use a closed system as a containment isolation boundary.” The proposed changes are confusing and could result in a number of interpretations and actions which was not the intent of the STS. The Notes imply that Prairie Island has the following types of penetrations: 1. Penetrations with two containment isolation valves (CIVs) that is not on a closed system; 2. Penetrations with two CIVs and a closed system; 3. Penetrations with one CIV that is not on a closed system; and 4. Penetrations with one CIV and a closed system. Based on the above types of penetrations and the proposed Notes, ITS 3.6.3 ACTION A would apply to Penetrations 1 and 3, ACTION B would apply to Penetration 1, and ACTION C would apply to Penetration 2 and 4. ITS 3.6.3 ACTION A would allow Penetration 3 to be isolated by a check valve with the flow through the valve secured. This is unacceptable to the staff. The staff did not allow this in NUREG -1433 (BWR/4) which had these types of penetrations. In addition ITS 3.6.3 ACTION C would allow 72 hours to isolate penetration type 2 and would result in entry into ITS LCO 3.0.3 if two valves were inoperable. The CTS, the old STS (NUREG-0452) and the STS do not allow this. They require isolation within 4 hours for these types of penetrations. This type of change would be considered a generic change which would require a major change to the STS to accommodate the various penetration designs. The staff’s position is that the STS wording is satisfactory, meets the intent in the TS and does not need to be changed. Thus the proposed Note changes should be deleted. However, if the Prairie Island design includes penetrations like Penetration 3 then it recommends that ITS 3.6.3 ACTION C be replaced by NUREG-1433 STS 3.6.1.3 ACTION C as modified by TSTF 30 Rev. 3 which takes into account these types of penetrations. See Comment Numbers 3.6.3-2, 3.6.3-3 and 3.6.3-8 for concerns on TSTF-30 and TSTF-207 which affect these Notes and ACTIONS. **Comment:** Revise the CTS/ITS markup to retain the STS 3.6.3 Conditions A, B and C Note wording and provide the appropriate discussions and justifications. If required, Revise the CTS/ITS markup to reflect the use of NUREG 1433 STS 3.6.1.3 ACTION C as modified by TSTF-30 Rev. 3, and provide the appropriate discussions and justifications for this change. See Comment Numbers 3.6.3-2, 3.6.3-3 and 3.6.3-8.

NMC Response:

3.6.3-2	DOC A3.6-23 DOC M3.6-32 JFD PA 3.6-116 JFD CL 3.6-121 JFD PA 3.6-124 JFD CL 3.6-126 JFD CL 3.6-137 CTS 3.6.C.3 CTS 3.6.D.2.b CTS 3.6.D.2.d CTS 3.6.D.2.e CTS 4.4.A.3 STS LCO 3.0.3 STS 3.6.3 Conditions A, B, C, D and E, SR 3.6.3.7 and Associated Bases ITS 3.6.3 Conditions A, B, and C, SRs 3.6.3.2 and 3.6.3.6 and Associated Bases
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CTS 3.6.C.3 specifies the actions to be taken for inoperable CIVs. CTS 3.6.D.2.d specifies that CTS 3.6.C.3 applies for inoperable Inservice Purge System valves and shield building ventilation dampers. The CTS/ITS markup contains two SRs for containment purge system leakage CTS 3.6.D.2.b and its corresponding ITS SR 3.6.3.6 and CTS 3.6.D.2.e and its corresponding ITS SR 3.6.3.2. In the ITS there is only one SR for purge valve leakage SR 3.6.3.7 which corresponds to ITS SR 3.6.3.6. In the STS if these SRs cannot be met, then STS 3.6.3 ACTION D as modified by TSTF 207 Rev. 5 or ACTION E is entered. In Revision 1 of the STS (all versions) if a CIV leakage SR was not met, it was unclear which action to enter, particularly if the overall containment leakage was not exceeded: STS LCO 3.0.3, or STS 3.6.3 ACTIONS A, B, or C. To correct this problem, TSTF 207 was developed. Even though the CTS does provide some explicate directions for the actions to be taken for purge valve leakage, the ITS does not. In fact, the ITS has the same STS problem that TSTF-207 Rev. 5 corrects. In addition, even though the ITS SRs are only required to be performed either prior to or after the system is used, the operator is responsible for ensuring that the leakage limits are not exceeded when the plant is in MODES 1, 2, 3 or 4. If the limits are exceeded at anytime the plant is in MODES 1, 2, 3 or 4, then the appropriate actions need to be entered. See Comment Number 3.6.3-12 for additional concerns regarding purge valve leakage. Also see Comment Numbers 3.6.3-1 and 3.6.3-3. **Comment:** Revise the CTS/ITS markups to add an ACTION for purge valve leakage (either STS 3.6.3 ACTION D, as modified by TSTF 207 Rev. 5, or E or an ACTION to reflect current licensing basis), revise Conditions A, B, C and their associated Notes to reflect TSTF 207 Rev. 5, and provide the appropriate discussions and justifications for these changes. See Comment Numbers 3.6.3-1, 3.6.3-3 and 3.6.3-12.

NMC Response:

3.6.3-3	DOC A3.6-23 DOC M3.6-32 JFD PA 3.6-116 JFD PA 3.6-121 JFD PA 3.6-124 CTS 3.0.C CTS 3.6.A.2 CTS 4.4.A.3 STS 3.6.3 Conditions A, B, C, and D, SR 3.6.3.11 and Associated Bases ITS 3.6.3 Conditions A, B, and C, SR 3.6.3.8 and Associated Bases
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For the shield building bypass leakage not within the limits of CTS 4.4.A.3, it would seem based on the CTS markup, that either CTS 3.0.C would apply if just the bypass leakage limits were exceeded, or CTS 3.6.A.2 would apply, if the bypass leakage plus any other leakage exceeds the overall containment leakage. The corresponding ITS SR for CTS 4.4.A.3 is ITS SR 3.6.3.8. In the STS this SR is STS SR 3.6.3.11. If this STS SR is not met then STS 3.6.3 ACTION D as modified by TSTF-207 Rev. 5 is entered. The ITS does not contain an action for when ITS SR 3.6.3.8 is not met and it is unclear as to what ACTION to enter, ITS LCO 3.0.3 or one of the ITS 3.6.3 ACTIONS. In addition, even though the ITS SR is only required to be performed on the frequency stated in the Containment Leakage Rate Testing Program, the operator is responsible

for ensuring that the leakage limits are not exceeded when the plant is in MODES 1, 3, 3 or 4. If the limits are exceeded at anytime the plant is in MODES 1, 2, 3 or 4, then the appropriate ACTIONS need to be entered. See Comment Number 3.6.3-1 and 3.6.3-2. **Comment:** Revise the CTS/ITS markups to add an ACTION for shield building bypass leakage not within limits (either STS 3.6.3 ACTION D as modified by TSTF 207 Rev. 5 or an ACTION to reflect current licensing basis), Revise Conditions A, B, C and their associated Notes to reflect TSTF-207 Rev. 5, and provide the appropriate discussions and justifications for these changes. See Comment Numbers 3.6.3-1 and 3.6.3-2.

NMC Response:

3.6.3-4 DOC M3.6-22
 CTS 3.6.C
 ITS 3.6.3 ACTION Notes 3 and 4

CTS 3.6.C is modified by DOC M3.6-22 which adds ITS 3.6.3 ACTION Notes 3 and 4. The justification for the addition of these Notes is incorrect. Both of these Notes provide the mechanism in the STS/ITS format to cascade to other relevant technical specifications. The CTS by its format and structure requires cascading. Thus the addition of ITS 3.6.3 ACTION Notes 3 and 4 are an Administrative change rather than a More Restrictive change. **Comment:** Revise the CTS markup and provide a discussion and justification for this Administrative change.

NMC Response:

3.6.3-5 DOC LR 3.6-1
 CTS 1.0 "CONTAINMENT INTEGRITY" Item 1
 ITS SRs 3.6.3.1, 3.6.3.2, 3.6.3.3, 3.6.3.4, 3.6.3.5, and 3.6.3.8 and Associated Bases

See Comment Number 3.6.1-3. **Comment:** See Comment Number 3.6.1.3.

NMC Response:

3.6.3-6 DOC LR 3.6-36
 CTS 3.6.D.2.e
 ITS B3.6.3 Bases - SR 3.6.3.2.

CTS 3.6.D.2.e states that the In-service Purge System blind flanges 42B and 43A in Unit 1 and 52 and 53 in Unit 2 shall be reinstalled each time after system use. The CTS markup shows that the flange designations have been relocated by DOC LR 3.6-36 to the Bases. The staff cannot find these blind flange designations in the Bases for ITS B3.6.3 Bases - SR 3.6.3.2 or anywhere else in ITS 3.6.3 Bases. **Comment:** Relocate this information to the Bases or provide a discussion and justification for its deletion.

NMC Response:

3.6.3-7 DOC L3.6-21
 JFD PA 3.6-113
 CTS 3.6.C.1
 STS 3.6.3 ACTION Note 1 and Associated Bases
 ITS 3.6.3 ACTION Note 1 and Associated Bases

CTS 3.6.C.1 allows non-automatic CIVs to be under direct administrative control and capable of being closed within one minute following an accident. This requirement as modified by DOC L3.6-21 is the basis for ITS 3.6.3 ACTION Note 1. However, the modifications made in the CTS do not correspond to the wording used in the ITS, but rather to the wording used in the STS. In addition, ITS 3.6.3 ACTION Note 1 is modified from the STS 3.6.3 ACTION Note 1 wording by the addition of the word "Non-automatic" at the beginning of the Note. The justification used for this addition JFD PA 3.6-113 states that "Penetrations with automatic isolation valves may be un-isolated to support plant operations." Nothing in the CTS supports this statement, and the proposed modification changes the intent of the Note. The STS Note serves two purposes: it allows CIVs closed as a result of the ACTION statements to be opened intermittently and it allows those valves whether automatic or manual that are required to be closed during plant operations to be opened intermittently without entering the ACTION statements. In addition, the proposed change may negate the portion of ITS 3.6.3 Required Action A.1 which allows a penetration flow path to be isolated by a check valve with the flow through the valve secured. The staff considers a check valve as an automatic valve. (See Comment Number 3.6.3-14). **Comment:** Revise the CTS/ITS markup to reflect the STS wording for ITS 3.6.3 Action Note 1. Provide the appropriate discussion and justifications as necessary.

NMC Response:

3.6.3-8 DOC L3.6-33
 JFD PA 3.6-116
 JFD TA 3.6-122
 STS 3.6.1.3 ACTION C (NUREG -1433)
 ITS 3.6.3 ACTION C and Associated Bases

In light of the discussion provided in Comment Number 3.6.3-1, ITS 3.6.3 ACTION C should be revised to conform to NUREG-1433 STS 3.6.1.3 ACTION C as modified by TSTF-30 Rev. 3. In addition, the Bases for ITS 3.6.3 ACTION C should be modified to conform to TSTF-30 Rev. 3. **Comment:** Revise the CTS/ITS markup to conform to TSTF-30 Rev. 3.

NMC Response:

3.6.3-9 JFD PA 3.6-125
 STS B3.6.3 Bases - LCO
 ITS B3.6.3 Bases - LCO

STS B3.6.3 Bases - LCO states the following: "The normally closed isolation valves are considered OPERABLE when...automatic valves are deactivated and secured in their

closed position...” ITS B3.6.3 modifies this statement as follows “when non-automatic power operated valves...”. While the proposed change may be acceptable for the non-automatic power operated valves, by deleting the reference to normally closed automatic valves, one is not defining the OPERABILITY of certain CIVs which by design are required to be deactivated and closed (e.g., to meet 10 CFR 50 Appendix R requirements). The staff recognizes that the STS statement may be confusing and recommends that the wording used in Nine Mile Point 2 be used in place of the STS wording. **Comment:** Revise the ITS markup as suggested.

NMC Response:

3.6.3-10 JFD CL 3.6-127
CTS 3.0.C
CTS 3.6.D.1
ITS LCO 3.0.3
ITS SR 3.6.3.1 and Associated Bases

ITS SR 3.6.3.1 verifies that each 36 inch containment purge penetration blind flange is installed prior to entering MODE 4 from MODE 5. As stated in other comments, the operator needs to be aware of plant/system conditions at all times that the plant is operating. If the blind flanges in ITS SR 3.6.3.1 are found while in MODES 1, 2, 3 or 4 to be not installed or improperly installed, no ACTION is provided in the ITS. The corresponding CTS requirement which is stated as an LCO would require entry into CTS 3.0.C. In the ITS a SR should have a corresponding ACTION for when the SR is not met. ITS LCO 3.0.3 should not be used as a default condition, unless specified in the ACTION statements, for unmet SRs. **Comment:** Revise the CTS/ITS markup to provide an appropriate ACTION for when SR 3.6.3.1 is not met, and provide the appropriate discussions and justifications for this change.

NMC Response:

3.6.3-11 JFD CL 3.6-137
JFD CI 3.6-212
CTS 3.6.D.1
CTS 3.6.D.2.b
CTS 4.4.A.3
ITS SR 3.6.3.6 and Associated Bases

CTS 3.6.D.2.b specifies that the Inservice Purge System valves shall be leak tested. The corresponding ITS SR is ITS SR 3.6.3.6. CTS 3.6.D.1 states that there is a 36 inch Containment Purge System. ITS B3.6.3 Bases - BACKGROUND states the following under the section labeled “Containment Purge System (36 inch purge valves):” “The 36 inch purge valves and dampers are not tested to verify their leakage rate is within the acceptable criteria of the Containment Leakage Rate Testing Program. Therefore blind flanges are installed...” The Safety Evaluation dated February 19, 1997, approving Amendments 126 and 118 for Prairie Island Units 1 and 2 respectively which implements 10 CFR 50 Appendix J, Option B, states that the containment purge valves will be tested in accordance with the Type C test interval. The staff Safety Evaluation

did not differentiate between the 36 inch Containment Purge System nor the Inservice Purge System; it just stated Containment Purge System. Thus CTS 4.4.A.3 is the CTS surveillance that is used for the leak testing of the 36 inch containment purge valves. This being the case, the ITS B3.6.3 Bases - BACKGROUND statement is incorrect and should be deleted. In addition it is assumed, based on the staff Safety Evaluation that the 36 inch containment purge valves have resilient seals and that any specific leakage rate acceptance criteria for both the 36 inch containment purge valves/dampers and the inservice purge valves/dampers are contained in the Containment Leakage Rate Program. Therefore, a surveillance performing a leak rate test for the 36 inch Containment Purge valves should be included similar in format and wording to ITS SR 3.6.3.8. See Comment Number 3.6.3-2 for discussion on appropriate Actions when SR is not met. **Comment:** Revise the CTS/ITS markup to include a leakage test surveillance for the 36 inch Containment Purge System and the appropriate ACTIONS for when the SR is not met. Provide the appropriate discussions and justifications for this Administrative change. See Comment Number 3.6.3-2.

NMC Response:

3.6.3-12 JFD CL 3.6-141
CTS 4.4.E
ITS SR 3.6.3.7 and Associated Bases

See Comment Number 3.6.0-2. **Comment:** See Comment Number 3.6.0.2

NMC Response:

3.6.3-13 JFD PA 3.6-203
STS B3.6.3 Bases - BACKGROUND
ITS B3.6.3 Bases - BACKGROUND

STS B3.6.3 Bases - BACKGROUND states the following: "Manual valves secured in their closed position (including check valves with flow through the valve secured), blind flanges..." ITS 3.6.3 Bases - BACKGROUND modifies the statement by JFD PA 3.6-203 as follows: "... (including check valves with flow through the valve secured, i.e., flow stopped by the check valve), ..." This change gives an erroneous interpretation to what is meant by flow through the valve secured, and could lead to problems implementing ITS 3.6.3 Required Action A.1. "Flow through the valve secured" is accomplished in the Action by closing the valve if it is a stop check valve, using another valve to secure the flow or turning off the pump. The proposed change i.e., "(that is) implies that flow stopped by the check valve is the only means to secure flow." **Comment:** Revise the ITS markup to delete this change.

NMC Response:

3.6.3-14 JFD CL 3.6-204
STS B3.6.3 Bases - BACKGROUND
ITS B3.6.3 Bases - BACKGROUND

STS B3.6.3 Bases - BACKGROUND states the following: "Check valves, or other automatic valves..." ITS B3.6.3 Bases - BACKGROUND deletes the words "Check valves, or other" by JFD CL 3.6-204. The justification states that check valves are not considered active devices. The staff's position is that check valves when used as CIVs are considered as automatic valves and thus are active devices. STS B3.6.3 Bases - BACKGROUND states this position and the discussion in STS B3.6.3 Bases - LCO reaffirms it when it differentiates between automatic power operated isolation valves and check valves. The Bases for this position can be found in 10 CFR 50 Appendix A, General Design Criteria 55, 56, and 57 which state that check valves may not be used as one of the automatic isolation valves for certain types of penetrations. **Comment:** Delete this change.

NMC Response:

3.6.3-15 JFD PA 3.6-124
ITS B3.6.3 Bases - LCO

ITS B3.6.3 Bases - LCO contains the following paragraph:

"Vent and drain valves located between two isolation devices are also containment isolation devices. A cap or blind flange, as applicable, must be installed on these vent and drain lines. A cap or blind flange installed is equivalent to a lock. However, a lock installed on the valve is not equivalent to a cap or blind flange. Therefore, the valve must be shut and the end capped or blind flanged to ensure that proper containment isolation is provided."

While the staff does not disagree with the intent of the paragraph, it does disagree with the sentence which states that "A cap or blind flange installed is equivalent to a lock." The staff does not consider a cap or blind flange as being the equivalent of a lock on a valve. A lock provides a visible reminder and/or a hinderance to opening or mis-positioning a valve. A cap or blind flange does not do this and it would not stop someone from removing the cap or blind flange as a lock would. **Comment:** Revise this paragraph to delete the discussion on caps and blind flanges being equivalent to locks.

NMC Response:

3.6.3-16 JFD PA 3.6-217
STS LCO 3.6.1.3 and Associated Bases (NUREG -1433)
ITS LCO 3.6.3 and Associated Bases
ITS 3.6.8 and Associated Bases

ITS B3.6.3 Bases - A.1 and A.2 contains the following statement: "Bases 3.6.8 provide further guidance if the vacuum breaker flow path has an inoperable isolation valve." In light of the discussions contained in Comment Numbers 3.6.8-2 and 3.6.8-3, it is recommended that ITS LCO 3.6.3 be revised to reflect that the Vacuum Breaker System is excluded from this specification and that the controls with regards to their isolation function are addressed in ITS 3.6.8. The wording for the LCO should be similar to NUREG -1433 STS LCO 3.6.1.3. **Comment:** Revise the CTS/ITS markup to reflect the above discussion. Provide the appropriate discussion and justification for this change.

See Comment Numbers 3.6.8-2 and 3.6.8-3.

NMC Response:

3.6.3-17 CTS 3.0.C
 CTS 3.6.C.3
 CTS 3.6.D.2.d
 ITS 3.6.3 ACTIONS and Associated Bases

CTS 3.6.C.3 and 3.6.D.2.d specify the actions to be taken for an inoperable CIV or Inservice Purge System valve. The corresponding ITS ACTION is ITS 3.6.3 ACTION A. If the CTS ACTIONS cannot be met or the allowed outage times are exceeded, then the CTS ACTIONS requires entry into CTS 3.0.C which requires a shutdown to MODE 5 in 37 hours. In the ITS if ITS 3.6.3 ACTION A cannot be met, ITS 3.6.3 ACTION D is entered which requires a shutdown to MODE 5 in 36 hours. No justification is provided for this More Restrictive change (37 hours to 36 hours). **Comment:** Revise the CTS markup and provide a discussion and justification for this More Restrictive change.

NMC Response:

3.6.3-18 STS B3.6.3 Bases - LCO
 ITS SR 3.6.3.5 and B3.6.3 Bases - APPLICABLE SAFETY ANALYSES, LCO and
 SR 3.6.3.5

The last sentence of the second paragraph of STS B3.6.3 Bases - LCO states the following: "The valves covered by this LCO are listed along with their associated stroke times in the FSAR (Ref. 4)." ITS B3.6.3 Bases - LCO deletes the phrase "along with their associated stroke times in the FSAR (Ref. 4)" from this sentence. No justification is provided for this deletion. In addition this deletion is incorrect. Based on the discussion provided in ITS B3.6.3 Bases - APPLICABLE SAFETY ANALYSES, the CIVs have isolation times associated with them. This along with ITS SR 3.6.3.5 which requires the CIV isolation time be verified to be within limits, suggests that there are documents which list the stroke time for all automatic containment isolation valves. Thus, the deleted phrase needs to be retained in ITS B3.6.3 Bases - LCO and the appropriate documents referenced so that the ITS users know where to find this information to verify compliance with the SR. **Comment:** Revise ITS B3.6.3 Bases-LCO to include the phrase "along with their associated stroke time" and the documents that contain the times.

NMC Response:

3.6.3-19 STS B3.6.3 Bases - LCO
 ITS SR 3.6.3.6, SR 3.6.3.8, and B3.6.3 Bases - LCO

The fourth paragraph of STS B3.6.3 Bases - LCO states the following: "Purge valves with resilient seals [and secondary containment bypass valves] must meet additional leakage rate requirements." ITS B3.6.3 Bases - LCO deletes this sentence. No justification is provided for this deletion. This is unacceptable. Since the ITS markup

contains two SRs- ITS SR 3.6.3.6 and 3.6.3.8 which require specific leak rate testing for the Inservice Purge System and shield building bypass leakage, this statement should remain because it is a true statement for Prairie Island. In addition, the staff Safety Evaluation dated February 19, 1997, approving Amendments 126 and 118 for Units 1 and 2 respectively which implements 10 CFR 50 Appendix J Option B states that there are specific limits for the shield building bypass leakage, and implies that there is specific leakage limits for the containment bypass valves and inservice purge valves. See Comment Number 3.6.3-11. **Comment:** Revise the ITS markup to retain the STS sentence as modified to reflect plant specific terminology. See Comment Number 3.6.3-11.

NMC Response:

3.6.3-20 STS SR 3.6.3.3, SR 3.6.3.4 and Associated Bases
 ITS SR 3.6.3.3, SR 3.6.3.4 and Associated Bases

STS B3.6.3 Bases - SR 3.6.3.3 and Bases - SR 3.6.3.4 state the following: "The SR specifies that containment isolation valves that are open under administrative controls are not required to meet the SR during the time the valves are open." ITS B3.6.3 Bases SR 3.6.3.3 and Bases - SR 3.6.3.4 modifies the beginning of the sentence as follows: "The SR specifies that containment isolation manual valves and blind flanges that are open..." No justification for this change is provided. However, a portion of the change is incorrect. The addition of the words "and blind flanges" is not supported by the STS/ITS SR 3.6.3.3 and SR 3.6.3.4 requirements. The SRs only allow the valves to be opened administratively not the blind flanges. **Comment:** Revise the ITS markup to delete the phrase "and blind flanges."

NMC Response:

S3.65A Containment Air Temperature

S3.6.5A-1 DOC A3.6-3
 DOC A3.6-11
 JFD CL 3.6-103
 JFD CL 3.6-104
 CTS 3.6.J
 CTS 3.6.K
 CTS 4.4.G
 CTS 4.4.H
 STS 3.6.5A and Associated Bases
 ITS SR 3.6.1.2, SR 3.6.1.3 and Associated Bases

CTS 3.6.J and 3.6.K specify the temperature limits for the containment and containment shell and the actions to be taken when these limits are exceeded. Even though CTS 4.4.G and 4.4.H only require the temperature limits to be verified prior to entering MODE 4 from MODE 5, the operator is responsible for ensuring that the temperature limits are not exceeded when the plant is in MODES 1, 2, 3, or 4. If the limits are exceeded at anytime the plant is in MODE 1, 2, 3, or 4, then the ACTIONS of CTS 3.6.J.2 and 3.6.K.2 are entered. These actions allow 8 hours to restore the temperature limits

before a shutdown is required. These specifications are incorporated into ITS 3.6.1 as ITS SR 3.6.1.2 and SR 3.6.1.3 respectively and the ACTIONS are modified to conform to the ACTIONS of ITS 3.6.1. This change deviates from the STS in that the temperature specifications are incorporated into the containment LCO rather than a separate LCO. Insufficient justification is provided to justify this deviation from the Standard. Since the CTS maintains these specifications as separate LCOs, and the CTS ACTIONS and the STS ACTIONS in STS 3.6.5 are identical, the staff believes that the ITS should maintain these two specifications either as two separate LCOs or combine them into one temperature LCO. As stated above, the operator must be aware of the plant conditions during operations; the staff believes that there could be situations during plant operations (MODES 1, 2, 3, or 4) in which the temperature limits will not be met, thus requiring entering the appropriate ACTIONS. The CTS and STS allow sufficient time to correct the problem based on the safety significance of the condition. The ITS implies that the safety significance of this temperature deviation is so important that it requires almost an immediate shutdown. If this is true then it could be applicable to all plants and thus would be considered as a generic change. The staff does not believe this is the case. Thus the less restrictive ACTIONS of the CTS and STS are appropriate. Because of this, the staff believes that a separate LCO(s) is warranted and that the proposed deviation from the STS is inappropriate. See Comment Numbers 3.6.1-1 and 3.6.1-2. **Comment:** Revise the CTS/ITS markups to reflect either a combined temperature LCO or two separate temperature LCOs. See Comment Numbers 3.6.1-1 and 3.6.1-2.

NMC Response:

3.6.5 Containment Spray and Cooling Systems

- 3.6.5-1 DOC A3.6-8
- JFD CL 3.6-147
- CTS 3.3.B.2
- STS 3.6.6A ACTIONS A, C and Associated Bases
- ITS 3.6.5 ACTIONS A, C and Associated Bases
- ITS 3.6.6 ACTIONS and Associated Bases

CTS 3.3.B.2 specifies the actions and to be taken for an inoperable containment spray train, containment fan cooler train and spray additive tank. CTS 3.3.B.2 states that “any one of the following conditions of inoperability may exist...” . This requirement, as stated in DOC A3.6-8, “prevents two or more of the listed conditions from existing at the same time.” In the ITS this CTS LCO is broken into two specifications (ITS 3.6.5 and 3.6.6) and justifies the deletion of this requirement based on the use of the Safety Function Determination Program (SFDP). In the CTS if more than one inoperability condition exists, one would enter CTS 3.0.C; in the STS/ITS using the SFDP the Actions associated with the inoperable systems would be entered and not necessarily STS/ITS LCO 3.0.3. In addition, based on the format and use of the STS/ITS, ITS 3.6.5 which is based in part on STS 3.6.6A would allow entry into more than one of the conditions specified in the CTS at the same time. Thus the conversion from the CTS to the ITS would be a Less Restrictive (L) change. See Comment Number 3.6.5-2 for additional concerns in this area. **Comment:** Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change. See Comment Number 3.6.5-2.

NMC Response:

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- 3.6.5-2 DOC A3.6-8
 JFD CL 3.6-147
 CTS 3.3.B.2
 STS 3.6.6A ACTIONS and Associated Bases
 ITS 3.6.5 ACTIONS A, C and Associated Bases
 ITS 3.6.6 ACTIONS and Associated Bases

CTS 3.3.B.2 specifies the actions to be taken for an inoperable containment spray train, containment fan cooler train and spray additive tank. CTS 3.3.B.2 states that “any one of the following conditions of inoperability may exist...” . This requirement, as stated in DOC A3.6-8, “prevents two or more of the listed conditions from existing at the same time.” In the ITS this CTS LCO is broken into two specifications (ITS 3.6.5 and 3.6.6) and based on the format and use of the STS/ITS, the ITS would allow entry into more than one of the conditions specified in the CTS at the same time. This overall change is acceptable (See Comment Number 3.6.5-1 for justifying change). STS 3.6.6A ACTIONS A and C have two Completion Times associated with the Condition. One time deals with the particular system inoperability and the second time “10 days from discovery of failure to meet LCO” deals with when the Completion Time clock is initiated, and prevents repeated entry into ACTIONS A and C. In the ITS this second Completion Time is deleted. The justification used JFD CL 3.6-147 acknowledges the purpose of the second Completion Time, but justifies the deletion saying that it is best handled under plant procedures since it creates confusion. The staff disagrees, and concludes that the change is a generic change which is beyond the scope of review for this conversion. The licensee has two options: They can use the STS as written that is with the second Completion Time in ITS 3.6.5 ACTION A and C or they can reformat ITS 3.6.5 and 3.6.6 ACTIONS to reflect the CTS requirements that is only one ACTION may be entered at a time. **Comment:** Delete this generic change. See Comment Number 3.6.5-1.

NMC Response:

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- 3.6.5-3 DOC A3.6.9
 CTS 4.5 Applicability
 CTS 4.5 Objective

DOC A3.6-9 justifies the deletion of the CTS Objective and Applicability statements in CTS 3.6 and 4.4. The CTS markup for CTS 4.5 does not show the deletion of the Objective and Applicability statements. **Comment:** Revise the CTS markup to delete the CTS 4.5 Applicability and Objective statements and provide a discussion and justification for this Administrative change.

NMC Response:

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- 3.6.5-4 DOC LR 3.6-66
 JFD CL 3.6-241

CTS 4.5.2.a
ITS SR 3.6.5.5, SR 3.6.5.6 and Associated Bases

CTS 4.5.2.a specifies that the Containment Spray System system test shall be performed except that the isolation valves in the spray supply lines at the containment and the spray additive tank isolation valves are blocked closed. The ITS breaks this CTS surveillance into two surveillances - ITS SR 3.6.5.5 and SR 3.6.5.6. ITS SR 3.6.5.5 verifies that each automatic containment spray valve that is not locked, sealed or otherwise secured in position actuates to its correct position on an actuation signal. It is implied from CTS 4.5.2.a and the ITS Bases that these blocked valves are automatic valves, but it is not clear. If they are manual valves there is no problem. However, if these valves are automatic, then there is the concern as to when these valves will be tested per ITS SR 3.6.5.5 since the locked, sealed, and secured exception in the SR could result in the valves never being tested for this SR. The exception from testing of locked, sealed or otherwise secured valves was only intended to apply to those valves that during normal operating conditions are locked, sealed, or otherwise secured in position. **Comment:** Specify whether these blocked valves are manual or automatic. If automatic, discuss when and how this valve will be tested in accordance with ITS SR 3.6.5.5.

NMC Response:

3.6.5-5 JFD CL3.6-141
CTS 4.4.F
CTS 4.5.A.2.a
CTS 4.5.A.3
CTS 4.5.B.3.f
ITS SRs 3.6.5.3, 3.6.5.5, 3.6.5.6, 3.6.5.7 and Associated Bases

See Comment Number 3.6.0-2. **Comment:** See Comment Number 3.6.0-2.

NMC Response:

3.6.5-6 JFD CL 3.6-238
ITS B3.6.5 Bases - SR 3.6.5.5 and SR 3.6.5.6

ITS B3.6.5 Bases - SR 3.6.5.5 and SR 3.6.5.6 deletes some sentences. This deletion is justified in the Bases by JFD CL 3.6-238. Part F of the submittal which lists the JFDs does not provide a difference category for JFD 3.6-238. **Comment:** Correct this discrepancy.

NMC Response:

3.6.5-7 CTS 4.5.A.2.a
CTS 4.5.B.3.f
ITS SR 3.6.5.5 and Associated Bases

ITS SR 3.6.6.5 exempts those automatic containment spray valves that are locked,

sealed or otherwise secured in position from the requirements of the surveillance. CTS 4.5.A.2.a and 4.5 B.3.f do not exempt these locked, sealed or otherwise secured valves. The CTS markup does not show or provide a justification for this Less Restrictive (L) change. **Comment:** Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.

NMC Response:

3.6.5-8 STS B3.6.6A Bases - B.1 and B.2
ITS B3.6.5 Bases - B.1 and B.2

The last sentence in STS B3.6.6A Bases - B.1 and B.2 states the following: "The extended interval to reach MODE 5 allows additional time for attempting restoration of the containment spray train and is..." ITS B3.6.5 Bases - B.1 and B.2 modifies this sentence by inserting the word "an" between "allows" and "additional", replacing "time" with "48 hours" and inserting "in MODE 3 and 36 hours to reach MODE 5" between "train" and "and". The sentence as modified is confusing and does not make sense.

Comment: Delete this change.

NMC Response:

3.6.6 Spray Additive System

3.6.6-1 DOC A3.6-08
CTS 3.3.B.2
ITS 3.6.6 ACTIONS and Associated Bases

See Comment Numbers 3.6.5-1 and 3.6.5-2. **Comment:** See Comment Numbers 3.6.5-1 and 3.6.5-2.

NMC Response:

3.6.6-2 DOC LR 3.6-73
DOC L 3.6-63
JFD CL3.6-141
CTS 4.5.B.3.d
CTS 4.5.B.3.f
ITS SR 3.6.6.4 and Associated Bases

CTS 4.5.B.3.d indicates that all the Spray Additive System valves are tested. CTS 4.5.B.3.f only tests the motor operated spray additive system valves. ITS SR 3.6.6.4 tests all automatic valves that are not locked, sealed or otherwise secured in position on a 24 month frequency. Since 4.5.B.3.d tests all the valves, the automatic valves covered by the SR are also encompassed by the requirements of ITS SR 3.6.6.4. Therefore, CTS 4.5.B.3.d should also indicate that it is part of ITS SR 3.6.6.4. In addition, the frequency associated with CTS 4.5.B.3.d may change as a result of the conversion to ITS SR 3.6.6.4, and DOC L3.6-63 will also apply. Also see Comment Number 3.6.6-4. **Comment:** Revise the CTS markup of CTS 4.5.B.3.d to reflect that it is part of ITS SR 3.6.6.4 and provide the appropriate discussions and changes as a

result of this incorporation. Also see Comment Number 3.6.6-4.

NMC Response:

3.6.6-3 JFD CL 3.6-141
CTS 4.5.B.3.d
CTS 4.5.B.3.f
ITS SR 3.6.6.4 and Associated Bases

See Comment Number 3.6.0-2. **Comment:** See Comment Number 3.6.0.2

NMC Response:

3.6.6-4 CTS 4.5.B.3.d
CTS 4.5.B.3.f
ITS SR 3.6.6.4 and Associated Bases

ITS SR 3.6.6.4 exempts those automatic spray additive valves that are locked, sealed or otherwise secure in position from the requirements of the surveillance. CTS 4.5.B.3.d and 4.5.B.3.f do not exempt these locked, sealed or otherwise secured valves. The CTS markup does not show or provide a justification for this Less Restrictive (L) change. **Comment:** Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.

NMC Response:

3.6.6-5 STS B3.6.7 Bases - SR 3.6.7.4
ITS B3.6.7 Bases - SR 3.6.6.4

The third sentence in STS B3.6.7 Bases - SR 3.6.7.4 states the following: "and the potential for an unplanned transient if the surveillance were performed with the reactor at power". ITS B3.6.7 Bases - SR 3.6.6.4 deletes the above words. No justification is provided for this deletion. **Comment:** Provide a discussion and justification for this deletion.

NMC Response:

3.6.7 Hydrogen Recombiners

3.6.7-1 DOC A3.6-39
CTS 3.6.L.2
ITS 3.6.7 ACTIONS A, B and Associated Bases

CTS 3.6.6.2 specifies the action to be taken for an inoperable hydrogen recombiner, which is to restore the hydrogen recombiner to OPERABLE status within 30 days. If the recombiner is not restored to OPERABLE status, CTS 3.6.L.2 does not specify any action, thus CTS 3.0.C is entered, which would require a shutdown to MODE 3. CTS 3.6.L.2 is modified in the CTS markup to require a shutdown to MODE 3 in 6 hours if the hydrogen recombiner cannot be restored to OPERABLE status. This change would

bring the CTS into conformance with ITS 3.6.7 ACTIONS A and B. The change is characterized as an Administrative change. This is incorrect. The change is a More Restrictive change. CTS 3.0.C allows 7 hours to reach MODE 3 (1 hour to prepare for the shutdown and 6 hours to reach MODE 3). **Comment:** Revise the CTS markup and provide a discussion and justification for this More Restrictive change.

NMC Response:

3.6.7-2 JFD CL3.6-141
CTS 4.4.i
ITS SRs 3.6.7.1, 3.6.7.2, 3.6.7.3 and Associated Bases.

See Comment Number 3.6.0-2. **Comment:** See Comment Number 3.6.0-2.

NMC Response:

3.6.7-3 CTS 3.6.L.2
ITS 3.6.7 ACTION A and Associated Bases

CTS 3.6.6.2 specifies the actions to be taken for an inoperable hydrogen recombiner, which is to restore the hydrogen recombiner to OPERABLE status within 30 days. The corresponding ITS ACTION is ITS 3.6.7 ACTION A. ITS 3.6.7 Required Action A.1 has a Note associated with it, which states that "LCO 3.0.4 is not applicable." The CTS has no equivalent to ITS LCO 3.0.4, and nothing in the wording of CTS Section 3.0 or CTS 3.6.L.2 would allow MODE changes during the 30 day allowed outage time. The addition of this Note is a Less Restrictive (L) change to the CTS. **Comment:** Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.

NMC Response:

3.6.8 Vacuum Breaker System

3.6.8-1 DOC L3.6-63
JFD CL 3.6-173
CTS 4.4.C
ITS SR 3.6.8.1 and Associated Bases

CTS 4.4.C specifies that the air operated valve in each vent line shall be tested to verify that the valve will open on a simulated containment vacuum, and close on a simulated accident signal. The corresponding ITS SR is ITS SR 3.6.8.1. ITS SR 3.6.8.1 uses either an actual or simulated containment vacuum and accident signal. Thus, CTS 4.4.C has been modified to add an actual containment vacuum and accident signal. This addition in the CTS markup is designated as DOC L3.6-63. Even though DOC L3.6-63 does discuss this type of change for other CTS SRs, CTS 4.4.C is not included in the DOC. **Comment:** Revise DOC L3.6-63 to include CTS 4.4.C.

NMC Response:

3.6.8-2 JFD CL 3.6-172
CTS 3.0.C
CTS 3.6.B.2
CTS 3.6.C.3
ITS LCO 3.0.3
ITS 3.6.3 ACTIONS A, B and D
ITS 3.6.8 ACTION A, C and Associated Bases

CTS 3.6.B.2 states the following: "With one vacuum breaker inoperable with respect to its containment isolation function, apply the requirements of specification 3.6.C.3..." The corresponding ITS ACTION is ITS 3.6.8 ACTION A, which states "Containment isolation function of one vacuum breaker train inoperable. Enter LCO 3.6.3 Condition A." The ITS ACTION is confusing and does not meet the current licensing basis of CTS 3.6.B.2. ITS B3.6.8 Bases - BACKGROUND LCO state that a train consists of two vacuum breaker/isolation valves per line. The CTS only allows one valve to be inoperable for the containment isolation function. If more than one valve is inoperable, CTS 3.0.C is entered. ITS 3.6.8 Condition A would allow both valves in a train to be inoperable, which is a Less Restrictive (L) change from the CTS requirements. In this Condition, the Required Action A.1 requires immediate entry into ITS 3.6.3 Condition A. If two valves are inoperable ITS 3.6.3 Condition A is an inappropriate Condition to enter, since it only applies to one valve inoperable. It is unclear and confusing as to which ACTION to enter for this particular condition: ITS LCO 3.0.3, ITS 3.6.3 ACTION B and D, or ITS 3.6.8 ACTION C. If it is ITS LCO 3.0.3 or ITS 3.6.3 ACTION B and D, then the change is Administrative; if it is ITS 3.6.8 then the change is Less Restrictive (L). See Comment Number 3.6.8-6 for concerns with regards to ITS 3.6.3 ACTION C. Also see Comment Numbers 3.6.3-16, 3.6.8-3 and 3.6.8-5. **Comment:** Revise the CTS/ITS markups to reflect the CTS ACTION requirements or revised ACTION requirements and provide the appropriate discussions and justifications for the proposed changes. See Comment Numbers 3.6.3-16, 3.6.8-3, 3.6.8-5 and 3.6.8-6.

NMC Response:

3.6.8-3 JFD CL 3.6-172
CTS 3.6.C.3
CTS 3.6.B.2
ITS3.6.3 ACTIONS
ITS 3.6.8 ACTION A and Associated Bases

CTS 3.6.B.2 states the following: "With one vacuum breaker inoperable with respect to its containment isolation function, apply the requirements of Specification 3.6.C.3...". The corresponding ITS ACTION is ITS 3.6.8 ACTION A which states "Containment isolation function of one vacuum breaker train inoperable. Enter LCO 3.6.3 Condition A." A concern arises with regards to the transfer of the Required Action to ITS 3.6.3; in particular to the use and application of the Notes associated with the ACTIONS. Assuming the staff agrees with the proposed wording of ITS 3.6.8 Required Action A.1 which transfers the ACTIONS to ITS 3.6.3 Condition A, the Notes embodied in ACTION A would apply for ITS 3.6.8 ACTION A. However, the staff questions whether ITS 3.6.3 ACTION Notes 1 through 4 would also apply to ITS 3.6.8 ACTION A as a result of this

transfer statement. The STS does not provide any guidance in this particular area. Definitely ITS 3.6.3 ACTION Note 4 has applicability to ITS 3.6.8 ACTION A, and ACTION Note 3 does not. However, based on the wording of CTS 3.6.B.2, ITS 3.6.3 ACTION Notes 1 and 2 are not currently allowed by CTS 3.6.B, and appropriate justification would be needed to apply them in this case. In addition, insufficient information is provided in the CTS and ITS Bases to make a determination of whether the ACTIONS associated with an inoperability with respect to containment isolation will effect the vacuum relief function of the inoperable train. If it does affect its OPERABILITY then the use of ITS 3.6.3 ACTION Note 2 which allows separate condition entry for each penetration flow path cannot be used or applies for ITS 3.6.8. To avoid confusion and interpretation problems, it is recommended that ITS 3.6.3 ACTION Notes 1, 2 and 4 and their applicability be stated as Notes to ITS 3.6.8 ACTIONS. Also consideration should be given to rewriting ITS 3.6.8 Required Action A.1 to explicitly state the actions to be followed rather than transfer the ACTION to another specification. See Comment Number 3.6.3-16. **Comment:** Revise the CTS/ITS markup in light of the above discussion and provide the appropriate discussions and justifications for the proposed changes. See Comment Number 3.6.3-16.

NMC Response:

3.6.8-4 JFD CL 3.6-172
 CTS 3.0.C
 CTS 3.6.B.3
 ITS LCO 3.0.3
 ITS 3.6.8 ACTIONS B, C and Associated Bases

CTS 3.6.B.3 states the following: “One vacuum breaker may be inoperable with respect to its vacuum relief function for 7 days”. The corresponding ITS ACTION is ITS 3.6.8 ACTION B, which states: “Vacuum relief function of one vacuum breaker train inoperable. Restore vacuum breaker train vacuum relief function to OPERABLE status. 7 days.” The ITS ACTION does not meet the current licensing basis of CTS 3.6.B.3. ITS B3.6.8 Bases - BACKGROUND and LCO state that a train consists of two vacuum breaker valves per line. The CTS only allows one valve to be inoperable with respect to the vacuum relief function. If more than one valve is inoperable, CTS 3.0.C is entered. ITS 3.6.8 Condition B would allow both valves in a train to be inoperable for 7 days which is a Less Restrictive (L) change from the CTS requirements. No justification for this change has been provided. In addition, if the requirements of ITS 3.6.8 Condition B cannot be met, ITS 3.6.8 ACTION C is entered which does not meet the requirements of the CTS. See Comment Number 3.6.8-6 for this concern. Also see Comment Number 3.6.8-5. **Comment:** Revise the CTS/ITS markups to reflect the CTS ACTION requirements or revised ACTION requirements and provide the appropriate discussions and justification for the proposed changes. See Comment Number 3.6.8-5 and 3.6.8-6.

NMC Response:

3.6.8-5 JFD CL 3.6-172
 CTS 3.0.C
 CTS 3.6.B.2

CTS 3.6.B.3
STS 3.6.6.A ACTIONS A or C
ITS 3.6.8 ACTIONS A, B and Associated Bases

CTS 3.6.B.2 and 3.6.B.3 specify the actions to be taken for an inoperable vacuum breaker with respect to its containment isolation function and its vacuum relief function, respectively. For the condition of either:

1. A vacuum breaker inoperable for both the containment isolation function and the vacuum relief function, or
2. Two vacuum breakers inoperable either on the same train or different trains, one for the containment isolation function and one for the vacuum relief function,

the CTS does not specify an action. The CTS structure would not allow simultaneous entry into CTS 3.6.B.2 and 3.6.B.3 for either condition 1 or 2 above. Thus, the CTS under these conditions would require immediate entry into CTS 3.0.C. However, the ITS would allow simultaneous entry for the above conditions into ITS 3.6.8 ACTIONS A and B. In addition the ITS ACTIONS would allow a vacuum breaker train to be inoperable indefinitely. This is unacceptable to the staff. Either ITS ACTIONS A and B are revised to conform to the CTS ACTIONS (See Comment Numbers 3.6.8-1 and 3.6.8-2) or are revised to take into account the above conditions and the Completion Times are modified by the limit "from discovery of failure to meet the LCO," such as is in STS 3.6.6A ACTIONS A or C. Note: See Comment Number 3.6.5-2 for reasons why this second option cannot be handled outside of Technical Specifications. **Comment:** Revise the CTS/ITS markups with respect to the above discussion and provide the appropriate discussions and justification for these changes.

NMC Response:

3.6.8-6 JFD CL 3.6-172
CTS 3.0.C
CTS 3.6.B.2
CTS 3.6.B.3
CTS 3.6.C.3
ITS 3.6.3 ACTIONS A and D
ITS 3.6.8 ACTIONS and Associated Bases

CTS 3.6.B.2, along with CTS 3.6.C.3 and CTS 3.6.B.3 specify the actions to be taken for an inoperable vacuum breaker with respect to its containment isolation function and vacuum relief function, respectively. The corresponding ITS ACTIONS are ITS 3.6.8 ACTION A along with ITS 3.6.3 ACTION A and ITS 3.6.8 ACTION B respectively. If the CTS ACTIONS cannot be met or the allowed outage times are exceeded, then all CTS ACTIONS require entry into CTS 3.0.C which requires a shutdown to MODE 5 in 37 hours. In the ITS if ITS 3.6.3 ACTION A or ITS 3.6.8 ACTIONS A and B cannot be met, ITS 3.6.3 ACTION D or ITS 3.6.8 ACTION C are entered which requires a shutdown to MODE 5 in 36 hours. No justification is provided for this More Restrictive change (37 hours to 36 hours). See Comment Number 3.6.3-17. **Comment:** Revise the CTS markup and provide a discussion and justification for this More Restrictive change. See Comment Number 3.6.3-17.

NMC Response:

3.6.8-7 JFD CL 3.6-181
CTS Table TS 4.1-1C, Item 10
ITS SR 3.6.8.2 and Associated Bases

See Comment Number 3.6.0-2. **Comment:** See Comment Number 3.6.0-2.

NMC Response:

3.6.9 Shield Building Ventilation System (SBVS)

3.6.9-1 DOC LR 3.6-2
CTS 1.0 "SHIELD BUILDING INTEGRITY"
ITS LCO 3.6.9 and Associated Bases

See Comment Number 3.6.10-1. **Comment:** See Comment Number 3.6.10-1.

NMC Response:

3.6.9-2 DOC LR 3.6-56
JFD CL 3.6-177
CTS 4.4.B.1
STS SR 3.6.13.5, SR 3.6.19.4 and Associated Bases
ITS SR 3.6.9.5 and Associated Bases
ITS 3.6.10 and Associated Bases

CTS 4.4.B.1 demonstrates that the SBVS is OPERABLE by verifying each train meets the drawdown performance criteria specified in the CTS and can achieve a negative pressure. The CTS is modified by relocating some information to the Bases of ITS SR 3.6.9.5 and adding a requirement to maintain a specific negative pressure. STS 3.6.13.5 is modified in the ITS to reflect the CTS requirements of CTS 4.4.B.1. While the staff finds that the change associated with relocating certain information to the Bases for the SR acceptable, the staff disagrees with the placement of the SR in ITS 3.6.9. The staff believes that ITS 3.6.10 is the appropriate specification for this SR. The CTS/ITS SR serves two purposes: 1, it verifies system OPERABILITY and 2, it verifies the shield building integrity and leak tightness. The primary purpose of this SR is to verify shield building integrity, as discussed and justified for the changes made to STS SR 3.6.19.4 by TSTF 322 Rev. 2. ITS secondary purpose was to verify system OPERABILITY. The old WOG STS (NUREG-0452) had this SR in the shield building ventilation specification, and there were interpretation problems with regards to the SR's purpose, OPERABILITY determinations, and which ACTION statements to enter. The improved STS (NUREG-1431) resolved these issues by placing this SR in the LCO associated with its primary purpose - determining shield building integrity. Thus, failure of the SR would result in an OPERABILITY determination which would determine if the failure as a result of loss of shield building integrity or system failure. This would determine which ACTIONS to enter. Also see Comment Numbers 3.6.10-2 and 3.6.10-3. In addition, the staff considers the change to be generic which is beyond the scope of review for this conversion. Thus CTS 4.4.B.1 should be placed in ITS 3.6.10 and

modified to reflect TSTF 322 Rev. 2 as appropriate. **Comment:** Revise the CTS/ITS markups and provide any additional discussions and justifications associated with placing this SR in ITS 3.6.10. See Comment Numbers 3.6.10-2 and 3.6.10-3.

NMC Response:

3.6.9-3 DOC L3.6-63
 CTS 4.4.B.3.c
 ITS SR 3.6.9.3 and Associated Bases

CTS 4.4.B.3.c specifies that each SBVS train automatically starts on a simulated safety injection signal. The corresponding ITS is ITS SR 3.6.9.3. ITS SR 3.6.9.3 uses either an actual or simulated safety injection signal. Thus CTS 4.4.B.3.c has been modified to add an actual signal. This addition in the CTS markup is designated as DOC L.3.6-63. Even though DOC L3.6-63 does discuss this type of change for other CTS SRs, CTS 4.4.B.3.c is not included in the DOC. **Comment:** Revise DOC L3.6-63 to include CTS 4.4.B.3.c.

NMC Response:

3.6.9-4 JFD CL 3.6-141
 CTS 4.0.A.2
 CTS 4.4.B.3.c
 ITS SR 3.6.4.3 and Associated Bases

CTS 4.4.B.3.c specifies that each SBVS train automatically starts on a simulated safety injection signal. The frequency for this surveillance as specified in CTS 4.4.B.3 is “At least once per operating cycle, or once each 18 months, whichever comes first.” The corresponding ITS SR is ITS SR 3.6.9.3 with a specified frequency of 24 months. The CTS markup of CTS 4.4.B.3.c has been modified to delete the words “once each 18 months whichever comes first.” The implication of the CTS/ITS markup is that “At least once per operating cycle” and “during each refueling shutdown” are synonymous and based on JFD CL 3.6-141, CTS 4.0.A.2 and ITS SR 3.0.2, the frequency would be stated as 24 months in the ITS. The staff does not believe that this change has been properly justified. The staff cannot find in the CTS anything which equates “once per operating cycle” with “during each refueling shutdown.” Even if the staff agreed that the two phrases were synonymous, the controlling frequency would be 18 months based on the phrase “whichever comes first.” Based on this, since a specified frequency is states (18 months) the allowance given for performing the frequency would be 18 month \pm 25% or approximately 22 months not the 24 months allowed for a refueling shutdown. The proposed SR frequency change (18 to 24 months) thus becomes a Less Restrictive (L) change which as not been justified either in the CTS markup and associated DOC or in the attachments to the Amendment submittal letter. See Comment Number 3.6.0-2. **Comment:** Revise the CTS/markup and provide a discussion and justification for this Less Restrictive (L) change. See Comment Number 3.6.0-2.

NMC Response:

3.6.9-5 JFD CL3.6-141
CTS 4.4.E
ITS SR 3.6.9.4 and Associated Bases

See Comment Number 3.6.0.2. **Comment:** See Comment Number 3.6.0-2.

NMC Response:

3.6.9-6 CTS 3.0.C
CTS 3.6.H.2
ITS 3.6.9 ACTIONS and Associated Bases

CTS 3.6.H.2 specifies the actions to be taken for an inoperable shield building ventilation train. The corresponding ITS ACTION is ITS 3.6.9 ACTION A. If the CTS ACTION cannot be met or the allowed outage times are exceeded, then the CTS requires entry into CTS 3.0.C which requires a shutdown to MODE 5 in 37 hours. In the ITS if ITS 3.6.9 ACTION A cannot be met ITS 3.6.9 ACTION B is entered which requires a shutdown to MODE 5 in 36 hours. No justification is provided for this More Restrictive change (37 hours to 36 hours). **Comment:** Revise the CTS markup and provide a discussion and justification for this More Restrictive change.

NMC Response:

3.6.10 Shield Building

3.6.10-1 DOC LR 3.6-2
CTS 1.0 "SHIELD BUILDING INTEGRITY"
ITS 3.6.9, 3.6.10 and Associated Bases

CTS 1.0 defines SHIELD BUILDING INTEGRITY. A markup of CTS 1.0 "SHIELD BUILDING INTEGRITY" provided in CTS 3.6 shows that the requirements are relocated to ITS B3.6.10 Bases and that the relocation is justified by DOC LR 3.6-2. While this change may be acceptable for the entire definition (See Comment Number 3.6.10-2), certain parts also have an Administrative change associated with it. The Administrative changes deal with the requirements of the definition being used as the basis for certain SRs and LCOs in ITS 3.6.9 and 3.6.10. CTS 1.0 "SHIELD BUILDING INTEGRITY" Item 1 is the basis for ITS SR 3.6.10.1 and Item 3 is the basis for ITS LCO 3.6.9. **Comment:** Revise the CTS markup and provide the appropriate discussion and justification for these Administrative changes. See Comment Number 3.6.10-2.

NMC Response:

3.6.10-2 DOC LR 3.6-2
JFD CL 3.6-284
CTS 1.0 "SHIELD BUILDING INTEGRITY" Item 3
ITS 3.6.9 and Associated Bases
ITS B3.6.10 Bases - LCO

CTS 1.0 defines SHIELD BUILDING INTEGRITY. A markup of CTS 1.0 is provided in

the markup of CTS 3.6. DOC LR 3.6-2 and JFD CL 3.6-284 state that the definition of SHIELD BUILDING INTEGRITY is deleted from the CTS/ITS and that the definition requirements have been relocated to the Bases for ITS 3.6.10. This justification is incorrect. CTS 1.0 "SHIELD BUILDING INTEGRITY" Item 3 states that "The Shield Building Ventilation System is OPERABLE." ITS B3.6.10 Bases - LCO states that "The Shield Building is OPERABLE when: c. At least one SBVS train is OPERABLE in accordance with SR 3.6.9.5." The CTS definition would require that both SBVS trains be OPERABLE and that would require all SRs associated with SBVS OPERABILITY be valid. The ITS for ITS 3.6.10 only requires one SBVS train be OPERABLE and defines that OPERABILITY as only meeting ITS SR 3.6.9.5 and not the other SRs associated with ITS LCO 3.6.9. The staff could accept the change from both SBVS trains OPERABLE to at least one SBVS train OPERABLE provided appropriate justification for this Less Restrictive (L) change is provided. However, limiting the OPERABILITY to successfully passing only one system SR is unacceptable. The staff recommends that the CTS/modified ITS requirement on the SBVS be deleted or considered relocated to ITS 3.6.9. See Comment Numbers 3.6.9-1 and 3.6.10-1. The basis for the deletion is that ITS 3.6.9 and its associated Bases assure that this requirement is met. Also, it alleviates the situation of entering the ACTIONS of both ITS 3.6.9 and 3.6.10 when the SBVS is inoperable for any reason, or if the ITS modification is used. In addition the licensee's proposed change lends weight to the staff argument in Comment Number 3.6.9-2 that ITS SR 3.6.9.5 should be in ITS 3.6.10. See Comment Number 3.6.10-3. **Comment:** Revise the CTS/ITS markups and provide the appropriate discussions and justifications for the changes discussed above. See Comment Number 3.6.9-1, 3.6.9.2, 3.6.10-1, and 3.6.10-3.

NMC Response:

3.6.10-3 DOC LR 3.6-56
 JFD CL 3.6-177
 CTS 4.4.B.1
 STS SR 3.6.13.5 SR 3.6.19.4 and Associated Bases
 ITS SR 3.6.9.5 and Associated Bases
 ITS 3.6.10 and Associated Bases

See Comment Numbers 3.6.9-2 and 3.6.10-2. **Comment:** See Comment Number 3.6.9-2.

NMC Response:
