SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 201 TO FACILITY OPERATING LICENSE NO. DPR-24

AND AMENDMENT NO. 206 TO FACILITY OPERATING LICENSE NO. DPR-27

NUCLEAR MANAGEMENT COMPANY, LLC

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-266 AND 50-301

1.0 INTRODUCTION

By application dated November 15, 1999, as supplemented March 15, June 15, June 19, July 28, August 17, September 14, October 19 and December 21, 2000, February 6, February 23, March 19, May 11, June 13, and July 27, 2001, the licensee requested an amendment to the Operating Licenses and Technical Specifications (TSs) for the Point Beach Nuclear Plant, Units 1 and 2 (Point Beach). The proposed amendment would convert the current TSs (CTS) to improved TSs (ITS).

In addition to the application discussed above, the licensee submitted two separate applications. The first is an application for amendment dated March 2, 2000, as supplemented August 14, 2000. The proposed amendment would implement a Core Operating Limits Report (COLR). This amendment would relocate cycle-specific reactor parameter limits from the TSs to a licensee-controlled document called a COLR. This action is addressed as beyond-scope item number 18 in this safety evaluation (SE).

The second application for amendment was dated March 10, 2000, as supplemented November 20, 2000, and April 10, 2001. The proposed amendment would implement a Pressure Temperature Limits Report (PTLR). This amendment would relocate pressure-temperature curves to a licensee-controlled document called a PTLR. This action is addressed as beyond-scope item number 19 in the enclosed SE.

The November 15, 1999, March 2, 2000, and March 10, 2000, applications were submitted by Wisconsin Electric Power Electric Company (WEPCo). WEPCo was subsequently succeeded by Nuclear Management Company, LLC (NMC), as the licensed operator of Point Beach, Units 1 and 2. By letter dated October 5, 2000, NMC requested that the NRC staff continue to process and disposition licensing actions previously docketed and requested by WEPCo.

Point Beach has been operating with TSs issued with the original Operating Licenses on October 5, 1970 (for Unit 1), and March 8, 1973 (for Unit 2), as amended. The proposed conversion is based upon:

- NUREG-1431, "Standard Technical Specifications for Westinghouse Plants," Revision 1, dated April 1995;
- Generic improvements to NUREG-1431, Revision 1;
- "Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (Final Policy Statement), published on July 22, 1993 (58 FR 39132); and
- 10 CFR 50.36, “Technical Specifications,” as amended July 19, 1995 (60 FR 36953).

Hereinafter, the proposed TSs for Point Beach are referred to as the ITS, the existing TSs are referred to as the CTS, and the improved standard TSs, such as in NUREG-1431, are referred to as the STS. The corresponding Bases are ITS Bases, CTS Bases, and STS Bases, respectively. For convenience, a list of acronyms used in this SE is provided in Attachment 1 to this SE.

In addition to basing the ITS on the STS, the Final Policy Statement, and the requirements in 10 CFR 50.36, the licensee retained portions of the CTS as a basis for the ITS. Plant-specific issues, including design features, requirements, and operating practices, were discussed with the licensee during a series of telephone conference calls that concluded on June 11, 2001. These plant-specific changes serve to clarify the ITS with respect to the guidance in the Final Policy Statement and the STS. Also, based on these discussions, the licensee proposed matters of a generic nature that were not in the STS. The NRC staff requested that the licensee submit such generic issues as proposed changes to the STS through the NRC/Nuclear Energy Institute's Technical Specifications Task Force (TSTF). These generic issues were considered for specific applications in the Point Beach ITS. Consistent with the Final Policy Statement, the licensee proposed transferring some CTS requirements to licensee-controlled documents (such as the Point Beach Final Safety Analysis Report (FSAR), for which changes to the documents by the licensee are controlled by a regulation such as 10 CFR 50.59 and may be changed without prior NRC approval). NRC-controlled documents, such as the TSs, may not be changed by the licensee without prior NRC approval. In addition, human factors principles were emphasized to add clarity to the CTS requirements being retained in the ITS, and to define more clearly the appropriate scope of the ITS. Further, significant changes were proposed to the CTS Bases to make each ITS requirement clearer and easier to understand.

The overall objective of the proposed amendments, consistent with the Final Policy Statement, is to rewrite, reformat, and streamline the TSs for Point Beach to be in accordance with 10 CFR 50.36.

Since the licensee submitted the November 15, 1999, application, a number of amendments to the Point Beach operating license were approved. The following table provides the subjects of the amendments and the dates of issuance.

Amendment Nos. Unit 1	Amendment Nos. Unit 2	Description of Change	Date
191	196	Removed test requirements for snubbers from CTS.	12/6/99
192	197	Updated FSAR references in CTS Table 15.3.5-5, postaccident monitoring Instrumentation, and in CTS 15.4.6.A.2, diesel generator safety-related load timing sequence.	12/23/99
193	198	CTS changes related to design and operation of fuel cycle to incorporate Westinghouse 422V+ fuel assemblies into the reactor cores.	2/8/00
194	199	Change to CTS 15.5.4 to remove one of the two separate methods for verifying the acceptability of reactor fuel for placement and storage in the spent fuel pool and new fuel storage vault. Also restores a phrase mistakenly removed from CTS page 15.5.4-1 by Amendment Nos. 193 and 198.	3/20/00
195	200	Relaxed surveillance interval for partial movement of all rods in CTS 15.4.1.B, Table 15.4.1-2, Item 10, from every 2 weeks to quarterly, as recommended by Generic Letter 93-05, “Line Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation.”	3/22/00
196	201	Clarification of containment tendon surveillance regarding selection of the control tendon in CTS 15.4.4.II.A, for consistency with the Point Beach Containment Tendon Surveillance Program.	6/27/00
197	202	Transfer of Point Beach Operating Licenses from WEPCo to NMC.	8/7/00
198	203	Eliminated license condition requiring submittal of an amendment transmitting a control room dose analysis without reliance on potassium iodide (KI), as well as a schedule for implementing the proposed changes.	8/15/00
199	204	Revised CTS 15.3.3.D, service water system, to more clearly define the requirements for service water system operability in accordance with the system configuration assumed in the service water system analysis.	11/17/00

Amendment Nos. Unit 1	Unit 2	Description of Change	Date
not applicable		Revised Bases for CTS 15.3.1.B (reactor coolant system pressure-temperature limits) to incorporate use of ASME Code Case N-641. A calculation using this code case demonstrated that CTS pressure-temperature curves and low temperature overpressure protection system setpoints are valid to 23.6 effective full power years for both units.	12/14/00
200	205	Revised Individual Rod Position Indication limits in CTS 15.3.10. The revision increased the allowable deviation for individual rod position indication.	5/08/01

The licensee has incorporated these amendments, as appropriate, into the ITS.

The license conditions included in the conversion amendment will make enforceable the following aspects of the conversion: (1) the relocation of requirements from the CTS and (2) the implementation schedule for new and revised surveillance requirements (SRs) in the ITS.

The Commission's proposed action for the ITS conversion was published in the *Federal Register* on June 22, 2001 (66 FR 33581). The *Federal Register* notice also addressed beyond-scope changes identified in the licensee's submittals. The Commission's proposed action on the implementation of a COLR was published in the *Federal Register* on August 9, 2000 (65 FR 48740). The Commission's proposed action on the implementation of a PTLR was published in the *Federal Register* on August 23, 2000 (65 FR 51364).

During its review, the NRC staff relied on the Final Policy Statement and the STS as guidance for acceptance of CTS changes. This SE provides a summary basis for the NRC staff's conclusion that the licensee can develop ITS based on STS, as modified by plant-specific changes, and that the use of the ITS is acceptable for continued operation of Point Beach. This SE also explains the NRC staff's conclusion that the ITS, which are based on the STS as modified by plant-specific changes, are consistent with the Point Beach current licensing basis and the requirements of 10 CFR 50.36.

The NRC staff also acknowledges that, as indicated in the Final Policy Statement, the conversion to ITS is a voluntary process. Therefore, it is acceptable that the ITS differ from the STS to reflect the current licensing basis for Point Beach. The NRC staff approves the licensee's changes to the CTS with modifications documented in the licensee's supplemental submittals.

For the reasons stated *infra* in this SE, the NRC staff finds that the ITS issued with these license amendments comply with Section 182a of the Atomic Energy Act, 10 CFR 50.36, and the guidance in the Final Policy Statement, and that they are in accord with the common defense and security and provide adequate protection of the health and safety of the public.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act requires that applicants for nuclear power plant operating licenses will state:

> [S]uch technical specifications, including information of the amount, kind, and source of special nuclear material required, the place of the use, the specific characteristics of the facility, and such other information as the Commission may, by rule or regulation, deem necessary in order to enable it to find that the utilization . . . of special nuclear material will be in accord with the common defense and security and will provide adequate protection to the health and safety of the public. Such technical specifications shall be a part of any license issued.

In 10 CFR 50.36, the Commission established its regulatory requirements related to the content of TSs. In doing so, the Commission placed emphasis on those matters related to the prevention of accidents and the mitigation of accident consequences. As recorded in the Statements of Consideration, "Technical Specifications for Facility Licenses; Safety Analysis Reports" (33 FR 18610, December 17, 1968), the Commission noted that applicants were expected to incorporate into their TSs "those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity." Pursuant to 10 CFR 50.36, TSs are required to include items in the following five specific categories related to station operation: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation (LCOs); (3) SRs; (4) design features; and (5) administrative controls. However, the rule does not specify the particular requirements to be included in a plant's TSs.

For several years, NRC and industry representatives have sought to develop guidelines for improving the content and quality of nuclear power plant TSs. On February 6, 1987, the Commission issued an interim policy statement on TS improvements, "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788). During the period from 1989 to 1992, utility owners groups and the NRC staff developed improved STS, such as NUREG-1431, that would establish models of the Commission's policy for each primary reactor type. In addition, the NRC staff, licensees, and owners groups developed generic administrative and editorial guidelines in the form of a "Writer's Guide" for preparing TSs, which gives greater consideration to human factors principles and was used throughout the development of licensee-specific ITS.

In September 1992, the Commission issued NUREG-1431, Revision 0, which was developed using the guidance and criteria contained in the Commission's Interim Policy Statement. The STS in NUREG-1431 was established as a model for developing the ITS for Westinghouse plants, in general. The STS reflect the results of a detailed review of the application of the interim policy statement criteria to generic system functions, which were published in a "Split Report" issued to the nuclear steam supply system (NSSS) vendor owners groups in May 1988. STS also reflect the results of extensive discussions concerning various drafts of STS, so that the application of the TS criteria and the Writer's Guide would consistently reflect

detailed system configurations and operating characteristics for all reactor designs. As such, the generic Bases presented in NUREG-1431 provide an abundance of information regarding the extent to which the STS present requirements that are necessary to protect public health and safety. The STS in NUREG-1431 apply to Point Beach.

On July 22, 1993, the Commission issued its Final Policy Statement, expressing the view that satisfying the guidance in the policy statement also satisfies Section 182a of the Act and 10 CFR 50.36. The Final Policy Statement described the safety benefits of the STS and encouraged licensees to use the STS as the basis for plant-specific TS amendments and for complete conversions to ITS based on the STS. Further, the Final Policy Statement gave guidance for evaluating the required scope of the TSs and defined the guidance criteria to be used in determining which of the LCOs and associated SRs should remain in the TSs. The Commission noted that, in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the TSs, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Appeal Board in *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). There, the Appeal Board observed:

> [T]here is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a technical specification, to be included in the license as an absolute condition of operation which is legally binding upon the licensee unless and until changed with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is that technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

By this approach, existing LCO requirements that fall within or satisfy any of the criteria in the Final Policy Statement should be retained in the TSs; those LCO requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents. The Commission codified the four criteria in 10 CFR 50.36 (60 FR 36953, July 19, 1995). The four criteria are as follows:

Criterion 1 — *Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.*

Criterion 2 — *A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

Criterion 3 *A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.*

Criterion 4 *A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.*

Part 3.0 of this SE explains the NRC staff's conclusion that the conversion of the Point Beach CTS to ITS based on STS, as modified by plant-specific changes, is consistent with the Point Beach current licensing basis and the requirements and guidance of the Final Policy Statement and 10 CFR 50.36.

3.0 EVALUATION

In its review of the Point Beach ITS application, the NRC staff evaluated six kinds of changes to the CTS as defined by the licensee. The NRC staff's review also included an evaluation of whether existing regulatory requirements are adequate for controlling future changes to requirements that are removed from the CTS and placed in licensee-controlled documents. Following are the six kinds of CTS changes:

A Administrative - changes to the CTS that result in no changes to existing restrictions and flexibility (i.e., nontechnical changes in the presentation of CTS requirements).

M More Restrictive - changes to the CTS that result in added restrictions or reduced flexibility (i.e., additional TS requirements).

L Less Restrictive "Specific" - changes to the CTS that result in reduced restrictions or added flexibility (i.e., changes, deletions, and relaxations of CTS requirements).

LA Less Restrictive - changes to the CTS that move details out of the CTS and into the Bases, FSAR, or other appropriate licensee-controlled documents (i.e., design details, system descriptive details, and procedural details).

LB Less Restrictive "Generic" - changes that remove details that are redundant to other regulatory requirements.

R Relocations - relaxations to the CTS in which whole CTS specifications (the LCO, and associated action and SRs) are relocated from the CTS to licensee-controlled documents.

The ITS application included a justification for each proposed change to the CTS in a numbered discussion of change (DOC), using the above letter designations as appropriate. In addition, the ITS application included an explanation of each difference between ITS and STS requirements in a numbered justification for difference (JFD).

In its review, the NRC staff identified the need for clarifications and additions to the November 15, 1999, ITS application in order to establish an appropriate regulatory basis for translation of CTS requirements into ITS. The NRC staff's comments were documented as requests for additional information (RAIs) and forwarded in letters dated April 19, May 5, May 15, June 21, July 3, August 17, August 24, September 8, November 6, November 17 and November 20, 2000, and January 25, 2001. The licensee provided responses to the RAIs in supplemental letters dated June 15, June 19, July 28, August 17, September 14, October 19, December 21, 2000, February 6, February 23, March 19, May 11, June 13, and July 27, 2001. The letters clarified the licensee's basis for translating the CTS requirements into ITS. The NRC staff finds that the licensee's submittals, including the responses to the RAIs, provide sufficient detail to allow the NRC staff to reach a conclusion regarding the adequacy of the licensee's proposed changes to the CTS.

The changes to the CTS, as presented in the ITS application, are listed and described in the following four tables attached to this SE:

- Table A - Administrative (A) Changes to the CTS
- Table M - More Restrictive (M) Changes to the CTS
- Table L - Less Restrictive (L and LB) Changes to the CTS
- Table R - Relocated Specifications (R) and Removed Details (LA) from the CTS

These tables provide a summary description of the proposed changes to the CTS, references to the specific CTS requirements that are being changed, and the specific ITS requirements that incorporate the changes. The tables are only meant to summarize the changes being made to the CTS. The details as to what the actual changes are and how they are being made to the CTS or ITS are provided in the licensee's application and supplemental letters.

The NRC staff's evaluation and additional description of the six kinds of changes to the CTS requirements listed in Tables A, M, L, and R are presented in Sections A through E below, as follows:

- Section A Administrative (A)
- Section B More Restrictive (M)
- Section C Less Restrictive and Less Restrictive "Generic" (L and LB)
- Section D Removed Details (LA)
- Section E Relocated Specifications (R)

The control of specifications, requirements, and information relocated from the CTS is described in Section F below, and other CTS changes (i.e., beyond-scope changes) are described in Section G below.

A. Administrative Changes to the CTS

Administrative (nontechnical) changes are intended to incorporate human factors principles into the form and structure of the ITS so that plant operations personnel can use them more easily. These changes are editorial in nature or involve the reorganization or reformatting of CTS requirements without affecting technical content or operational restrictions. Every section of the ITS reflects this type of change. In order to ensure consistency, the NRC staff and the licensee

have used the STS as guidance to reformat and make other administrative changes. Among the changes proposed by the licensee and found acceptable by the NRC staff are:

- Identifying plant-specific wording for system names, etc.;
- Splitting up requirements currently grouped under a single current specification and moving them to more appropriate locations in two or more specifications of ITS;
- Combining related requirements currently presented in separate specifications of the CTS into a single specification of ITS;
- Presentation changes that involve rewording or reformatting for clarity (including moving an existing requirement to another location within the TSs) but which do not involve a change in requirements;
- Wording changes and additions that are consistent with CTS interpretation and practice, and that more clearly or explicitly state existing requirements;
- Deletion of TSs which no longer apply;
- Deletion of details that are strictly informational and have no regulatory basis; and
- Deletion of redundant TS requirements that exist elsewhere in the TSs.

Table A lists the administrative changes being made in the Point Beach ITS conversion. Table A is organized in STS order by each A-type DOC to the CTS, provides a summary description of the administrative change that was made, and provides CTS and ITS references. The NRC staff reviewed all of the administrative and editorial changes proposed by the licensee and finds them acceptable because they are compatible with the Writer's Guide and the STS, do not result in any change in operating requirements, and are consistent with the Commission's regulations.

B. More Restrictive Changes to the CTS

The licensee, in electing to implement the specifications of the STS, proposed a number of requirements more restrictive than those in the CTS. The ITS requirements in this category include requirements that are either new, more conservative than corresponding requirements in the CTS, or have additional restrictions that are not in the CTS but are in the STS. Examples of more restrictive requirements are placing an LCO on plant equipment which is not required by the CTS to be operable, more restrictive requirements to restore inoperable equipment, and more restrictive SRs. Table M lists the more restrictive changes being made in the Point Beach ITS conversion. Table M is organized in STS order by each M-type DOC to the CTS and provides a summary description of the more restrictive change that was adopted, and the CTS and ITS references. These changes are additional restrictions on plant operation that enhance safety and are acceptable.

C. Less Restrictive and Less Restrictive "Generic" Changes to the CTS

Less restrictive requirements include deletions and relaxations to portions of the CTS requirements that are being retained in the ITS. When requirements have been shown to give little or no safety benefit, their relaxation or removal from the TSs may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of: (1) generic NRC actions, (2) new NRC staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the owners groups' comments on the STS. The NRC staff reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the

Commission's regulations. The Point Beach design was also reviewed to determine if the specific design basis and licensing basis for Point Beach are consistent with the technical basis for the model requirements in the STS, and thus provide a basis for the ITS.

All of the less restrictive changes to the CTS have been evaluated and found to involve deletions and relaxations to portions of the CTS requirements that can grouped in the following seven categories:

- Relaxation of LCO Requirement (Category 1)
- Relaxation of Applicability (Category 2)
- Relaxation of SR (Category 3)
- Relaxation of Required Action (Category 4)
- Relaxation of CTS Reporting Requirements (Category 5)
- Relaxation of Completion Time (Category 6)
- Deletion of Requirements Redundant to Regulation (Category 7)

The following discussions address why portions of various specifications within each of these seven categories of information or specific requirements are not required to be included in ITS:

1. Relaxation of LCO Requirement (Category 1)

   The CTS contain LCOs that are overly restrictive because they specify limits on operational and system parameters and on system operability beyond those necessary to meet safety analysis assumptions. The CTS also contain administrative controls that do not contribute to the safe operation of the plant. The ITS, consistent with the guidance in the STS, omit such operational limits and administrative controls. This category of change includes (1) deletion of equipment or systems addressed by the CTS LCOs that are not required or assumed to function by the applicable safety analyses; (2) addition of explicit exceptions to the CTS LCO requirements (e.g., mode entry restrictions equivalent to those of ITS LCO 3.0.4) consistent with the guidance of the STS and normal plant operations to provide necessary operational flexibility but without a significant safety impact; and (3) deletion of miscellaneous administrative controls such as reporting requirements, sometimes contained in action requirements, that have no effect on safety. Deletion of such administrative controls allows operators to more clearly focus on issues important to safety. The ITS LCOs and administrative controls resulting from these changes will continue to maintain an adequate degree of protection consistent with the safety analysis, while providing an improved focus on issues important to safety and necessary operational flexibility without adversely affecting the safe operation of the plant. Therefore, these less restrictive changes, which are consistent with STS and fall within Category 1, are acceptable.

2. Relaxation of Applicability (Category 2)

   Reactor operating conditions are used in CTS to define when LCO features are required to be operable. CTS applicability requirements can be specific defined terms of reactor conditions, such as hot shutdown, cold shutdown, reactor critical, or power operating conditions. CTS applicability requirements can also be more general. Depending on the circumstances, the CTS may require that an LCO be maintained within limits in “all modes” or “any operating mode.” Generalized applicability

conditions are not contained in STS; therefore, ITS eliminates CTS requirements such as “all modes” or “any operating mode,” replacing them with ITS-defined modes or applicable conditions that are consistent with the application of the plant safety analysis assumptions for operability of the required features.

In another application of this category of change, CTS requirements may be eliminated during conditions for which the safety function of the specified safety system is met because the feature is performing its intended safety function. Deleting applicability requirements that are indeterminate or which are inconsistent with application of accident analyses assumptions is acceptable because when LCOs cannot be met, the TSs are satisfied by exiting the specified LCO’s applicability, thus taking the plant out of the conditions that require the safety system to be operable. Therefore, these changes, which are consistent with STS and fall within Category 2, are acceptable.

3. Relaxation of SR (Category 3)

Prior to placing the plant in a specified operational mode or other condition stated in the applicability of an LCO, and in accordance with the specified SR frequency thereafter, the CTS require verifying the operability of each LCO-required component by meeting the SRs associated with the LCO. This usually entails performance of testing to demonstrate the operability of the LCO-required components, or the verification that specified parameters are within LCO limits. A successful demonstration of operability requires meeting the specified acceptance criteria as well as any specified conditions for the conduct of the test. Relaxations of CTS SRs include relaxing both the acceptance criteria and the conditions of performance. These CTS SR relaxations are consistent with the STS.

Relaxations of CTS SR acceptance criteria provide operational flexibility, consistent with the guidance of the STS, but do not reduce the level of assurance of operability provided by the successful performance of the surveillance. Such revised acceptance criteria are acceptable because they remain consistent with the application of the plant safety analysis assumptions for operability of the LCO-required features.

Relaxations of CTS SR performance conditions include not requiring testing of deenergized equipment (e.g., instrumentation channel checks) and equipment that is already performing its intended safety function (e.g., position verification of valves locked in their safety actuation position). These changes are acceptable because the existing surveillances are not necessary to ensure the capability of the affected components to perform their intended functions. Another relaxation of SR performance conditions is the allowance to verify the position of valves in high radiation areas by administrative means. This change is acceptable because licensee controls regarding access to high radiation areas make the likelihood of mispositioning such valves negligible.

Finally, the ITS permits the use of an actual, as well as a simulated, actuation signal to satisfy SRs for automatically actuated systems. This is acceptable because TS-required features cannot distinguish between an “actual” signal and a “test” signal.

These relaxations of CTS SRs optimize test requirements for the affected safety systems and increase operational flexibility. Therefore, because of the reasons stated, less restrictive changes to CTS SRs falling within Category 3 are acceptable.

4. Relaxation of Required Actions (Category 4)

An LCO is the lowest functional capability or performance level of equipment required for safe operation of the facility. When an LCO is not met, the CTS specify actions to be taken until the equipment is restored to its required capability or performance level, or remedial measures are established. Compared to CTS-required actions, the ITS actions result in extending the time period for taking the plant outside the applicability into shutdown conditions. For example, changes in this category include providing an option to (1) isolate a system, (2) place equipment in the state assumed by the safety analysis, (3) satisfy alternate criteria, (4) take manual actions in place of automatic actions, (5) "restore to operable status" within a specified time frame, (6) place alternate equipment into service, or (7) use more conservative TS setpoints. The resulting ITS actions continue to provide measures that conservatively compensate for the inoperable equipment. The ITS actions are commensurate with safety importance of the inoperable equipment, plant design, and industry practice and do not compromise safe operation of the plant. Therefore, these changes, which are consistent with STS and fall within Category 4, are acceptable.

5. Relaxation of CTS Reporting Requirements (Category 5)

The CTS include requirements to submit special reports when specified limits are not met. Typically, the time period for the report to be issued is within 30 days. However, the STS eliminates the TS administrative control requirements for special reports and instead relies on the reporting requirements of 10 CFR 50.73. The ITS changes to reporting requirements are acceptable because 10 CFR 50.73 provides adequate reporting requirements, and the special reports do not affect continued plant operation. Therefore, this change has no impact on the safe operation of the plant. Additionally, deletion of TS reporting requirements reduces the administrative burden on the plant and allows efforts to be concentrated on restoring TS-required limits. Therefore, these changes, which are consistent with the STS and fall within Category 5, are acceptable.

6. Relaxation of Completion Time (Category 6)

Upon discovery of a failure to meet an LCO, the TS specify times for completing Required Actions of the associated TS conditions. Required Actions establish remedial measures that must be taken within specified completion times. These times define limits during which operation in a degraded condition is permitted.

Incorporating completion time extensions is acceptable because completion times take into account the operable status of the redundant systems of TS-required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, vendor-developed standard repair times, and the low probability of a design-basis accident (DBA) occurring during the repair period. Therefore, required action completion time extensions, which are consistent with STS and fall within Category 6, are acceptable.

7. Deletion of Requirements Redundant to Regulation (Category 7)

   The CTS contain requirements that are redundant to regulations. For example, many CTS reporting requirements are also required by 10 CFR 50.72 and 10 CFR 50.73. The CTS include requirements to submit special reports when specified limits, LCOs, or action requirements are not met. However, the ITS, consistent with the STS, omit many of the CTS reporting requirements because the reporting requirements in the regulations cited are acceptable and do not need repeating in the TSs to ensure timely submission to the NRC. In addition, these redundant CTS reporting requirements are administrative in nature and do not affect plant safety. Therefore, this type of change has no impact on the safe operation of the plant. Deletion of these requirements is beneficial because it reduces the administrative burden on the plant and fosters a better focus on operational matters important to safety. Therefore, less restrictive changes falling within Category 7 are acceptable.

Table L is organized in STS order by each L- and LB-type DOC. For each change, the table lists (1) the DOC identifier (e.g., 3.1.1 followed by L1 means STS 3.1.1, DOC L1); (2) a summary description of the change; (3) the reference numbers of the associated ITS requirements; (4) the reference numbers of the associated CTS requirements; and (5) the less restrictive change category.

D. Removed Details from the CTS

When requirements have been shown to give little or no safety benefit, their removal from the TSs may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the owners groups' comments on the STS. The NRC staff reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in STS, and thus provide a basis for ITS. Changes to the CTS that involve the removal of specifications, specific requirements, or detailed information from individual specifications were all evaluated and grouped as follows:

Type 1 Details of System Design and System Description Including Design Limits

Type 2 Descriptions of System or Plant Operation

Type 3 Procedural Details for Meeting TS Requirements and Related Reporting Requirements

Type 4 Relocated Redundant Requirements

The following discussions address why each of the four types of information or specific requirements are not required to be included in the ITS.

1. Details of System Design and System Description Including Design Limits (Type 1)

   The design of the facility is required to be described in the FSAR by 10 CFR 50.34. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 require that plant design be documented in controlled procedures and drawings, and maintained in accordance with an NRC-approved QA Program (FSAR Chapter 1.4). The regulation at 10 CFR 50.59 specifies controls for changing the facility, as described in the FSAR. Point Beach's FSAR includes, by reference, the new Technical Requirements Manual (TRM). The regulation at 10 CFR 50.54(a) specifies criteria for changing the QA Program. The ITS Bases also contain descriptions of system design. The Point Beach administrative controls specification ITS 5.5.13 specifies controls for changing the Bases. Removing details of system design from the CTS is acceptable because this information will be adequately controlled by NRC requirements, the FSAR, controlled design documents and drawings, or the Bases, as appropriate. Cycle-specific design limits are moved from the CTS to the COLR in accordance with Generic Letter (GL) 88-16. ITS Administrative Controls are revised to include the programmatic requirements for controlling the COLR. Therefore, it is acceptable to remove Type 1 details from CTS and place them in licensee-controlled documents.

2. Descriptions of System or Plant Operation (Type 2)

   The plans for the normal and emergency operation of the facility are required to be described in the FSAR by 10 CFR 50.34. ITS 5.4.1.a requires written procedures to be established, implemented, and maintained for plant operating procedures. Controls specified in 10 CFR 50.59 apply to changes in procedures, as described in the FSAR. In the ITS, the Bases also contain descriptions of system operation. The CTS provide lists of acceptable devices that may be used to satisfy LCO requirements. The ITS reflect the STS approach to provide LCO requirements that specify the protective limit that is required to meet safety analysis assumptions for required features. The protective limits replace the lists of specific devices previously found to be acceptable to the NRC staff for meeting the LCO. The ITS changes provide the same degree of protection required by the safety analysis and provide flexibility for meeting limits without adversely affecting operations since equivalent features are required to be operable. It is acceptable to remove details of system operation from the TSs because this type of information will be adequately controlled in the FSAR, plant operating procedures, and Bases, as appropriate. Therefore, it is acceptable to remove Type 2 details from CTS and place them in licensee-controlled documents.

3. Procedural Details for Meeting TS Requirements, Related Reporting Requirements, and Indication-Only Instrumentation Requirements (Type 3)

   Details for performing actions and SRs are more appropriately specified in the plant procedures required by ITS 5.4.1, the FSAR, and the Bases. For example, control of plant conditions for surveillance testing is more appropriately governed by procedures and scheduling and has previously been determined to be unnecessary as a TS requirement. As indicated in GL 91-04, allowing this procedural control is consistent with the vast majority of other SRs that do not dictate plant conditions for

surveillances. Prescriptive procedural information in an action requirement is unlikely to contain all procedural considerations necessary for the plant operators to complete the actions required, and referral to plant procedures is therefore required in any event. Other changes to procedural details include those associated with limits retained in the ITS. For example, the ITS requirement may refer to programmatic requirements such as COLR, included in ITS Section 5.5, which specifies the scope of the limits contained in the COLR and mandates NRC approval of the analytical methodology. The QA Program is approved by the NRC and contained in FSAR Chapter 1.4, and changes to the QA Program are controlled by 10 CFR 50.54(a). The Offsite Dose Calculation Manual (ODCM) is required by ITS Section 5.5.1. The TRM is incorporated by reference into the FSAR, and changes to the TRM are controlled by 10 CFR 50.59. The Inservice Testing (IST) Program is required by ITS 5.5.7 and is controlled by ITS 5.4.1.j. Indication-only instrumentation, test equipment, and alarms used for monitoring system operation and testing are usually not required to be operable to support the operability of a system or component. Thus, the STS generally contain no operability, action, or SR for indication-only equipment. Control of the availability of, and necessary compensatory activities if not available, for such indication instruments, monitoring instruments, and alarms are presently addressed by plant operational procedures and policies.

The removal of these kinds of procedural details from the CTS is acceptable because they will be adequately controlled by NRC requirements, the FSAR, plant procedures, Bases, and COLR, as appropriate. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. Similarly, removal of reporting requirements from LCOs is appropriate because ITS 5.6, 10 CFR 50.36, and 10 CFR 50.73 adequately cover the reports deemed to be necessary. Removal of requirements for indication-only instrumentation is acceptable because such instrumentation usually does not support system operability. Therefore, it is acceptable to remove Type 3 details from the CTS and place them in licensee-controlled documents.

4. Relocated Redundant Requirements (Type 4)

Certain CTS administrative requirements are redundant to regulations and thus are relocated to the FSAR or other appropriate licensee-controlled documents. The Final Policy Statement allows licensees to relocate to licensee-controlled documents CTS requirements that do not meet any of the criteria for mandatory inclusion in the TSs. Changes to the facility or to procedures as described in the FSAR are made in accordance with 10 CFR 50.59. Changes made in accordance with the provisions of other licensee-controlled documents are subject to the specific requirements of those documents. For example, 10 CFR 50.54(a) governs changes to the QA Plan and ITS 5.5.13 governs changes to the ITS Bases. Therefore, it is acceptable to remove Type 4 details from the CTS and place them in licensee-controlled documents.

CTS requirements that are not required to be in TSs and that can be adequately controlled by other regulatory or TS requirements can be relocated to licensee controlled documents. Table R lists the requirements and detailed information in the CTS that are being moved to licensee-controlled documents and are not being retained in the ITS.

Table R is organized in STS order by each LA- and R-type DOC. It includes the following: (1) the DOC identifier (e.g., 3.1.1 followed by LA1 means STS 3.1.1, DOC LA1); (2) the reference numbers of the associated CTS requirements; (3) a summary description of the relocated details and requirements; (4) the name of the licensee-controlled document to contain the relocated details and requirements (location); (5) the regulation (or ITS Specification) for controlling future changes to relocated requirements (change control process); and (6) a characterization of the type of change (not applicable to R-type DOCs).

The NRC staff has concluded that these types of detailed information and specific requirements do not need to be included in the ITS to ensure the effectiveness of the ITS to adequately protect the health and safety of the public. Accordingly, these requirements may be moved to one of the following licensee-controlled documents for which changes are adequately governed by a regulatory or TS requirement:

- Bases controlled in accordance with ITS 5.5.13, "Technical Specifications (TS) Bases Control Program."
- FSAR (which includes the TRM as Appendix T) controlled by 10 CFR 50.59.
- Programmatic documents required by ITS Section 5.5 and controlled by ITS Section 5.4.
- Inservice Inspection (ISI) and IST Programs controlled by 10 CFR 50.55a.
- OCDM controlled by ITS 5.5.1.
- COLR controlled by ITS 5.6.4.
- PTLR controlled by ITS 5.6.5.
- QA Plan, as approved by the NRC and referenced in the FSAR, controlled by 10 CFR Part 50, Appendix B, and 10 CFR 50.54(a).
- Site Emergency Plan controlled by 10 CFR 50.54(q).

To the extent that information has been relocated to licensee-controlled documents, such information is not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to public health and safety. Further, where such information is contained in LCOs and associated requirements in the CTS, the NRC staff has concluded that they do not fall within any of the four criteria set forth in 10 CFR 50.36(c)(2)(ii) and discussed in the Final Policy Statement (see Section 2.0 of this SE). Accordingly, existing detailed information, such as generally described above, may be removed from the CTS and not included in the ITS.

E. Relocated Specifications (R) from the CTS

The Final Policy Statement states that LCOs and associated requirements that do not satisfy or fall within any of the four specified criteria (now contained in 10 CFR 50.36(c)(2)(ii)) may be relocated from existing TSs (an NRC-controlled document) to appropriate licensee-controlled documents. This section of the SE discusses the relocation of entire specifications in the CTS to licensee-controlled documents. These specifications include the LCOs, Action Statements (i.e., Actions), and associated SRs. In its application and its supplements, the licensee proposed relocating such specifications from the CTS to the FSAR, which includes the TRM, the Environmental Manual (EM), and the ODCM, as appropriate. The NRC staff has reviewed the licensee's submittals and finds that relocation of these requirements to the FSAR, TRM, EM, and ODCM is acceptable in that changes to the FSAR, TRM, EM, and ODCM will be adequately controlled by 10 CFR 50.59, 10 CFR 50.54(a), 10 CFR 50.55a, and ITS 5.5.1, as

applicable. These provisions will continue to be implemented by appropriate station procedures (i.e., operating procedures, maintenance procedures, surveillance and testing procedures, and work control procedures).

Table R lists all specifications that are being relocated from the CTS to licensee-controlled documents. Table R is organized as described in Section 3.0.D above.

The NRC staff's evaluation of each relocated specification listed in Table R is provided below:

1. Movable Incore Detector System

   The relocation of the movable incore detector system is addressed in DOC 3.2.2-R1 and in Appendix A (Justification 10) to the November 15, 1999, application. CTS requirements for the movable incore detector system are found in CTS 15.3.11.A and CTS 15.3.11.B.

   The movable incore detector system is used to perform periodic surveillances of core peaking factors and calibration of the excore detectors. This system is not used continuously and does not provide any automatic protection functions. Therefore, the movable incore detector system CTS requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Consequently, it is acceptable to relocate these requirements to the TRM.

2. Emergency Plan Radiation Monitors

   The relocation of the CTS requirements for the emergency plan radiation monitors is addressed in ITS DOC 3.3.1-R1 and in Appendix A (Justification 15) to the November 15, 1999, application. CTS requirements for the emergency plan radiation monitors are found in CTS 15.4.1.A, Table 15.4.1-1, Item 29, check, calibration, and test of emergency plan radiation survey instruments.

   The emergency plan radiation monitors are not used continuously and do not provide any automatic protection functions. They are not (a) used for detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA; (b) used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient; or (c) part of a primary success path in the mitigation of a DBA or transient. Therefore, the emergency plan radiation monitor CTS requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Consequently, it is acceptable to relocate these requirements to the TRM.

3. Effluent Radiation Monitoring - Area Radiation and Process Monitors

   The relocation of the CTS requirements for the area radiation and process monitors is addressed in DOC 3.3.1-R1 and in Appendix A (Justification 9) to the November 15, 1999, application. CTS requirements for the area radiation and process monitors are found in CTS 15.4.1.A, Table 15.4.1-1, Item 36 Radiation Monitoring System, check (note 7), calibration (note 14), and test of the monitors RE-218, WDS Liquid Monitor and RE-223, Waste Distillate Overboard Monitor.

The area radiation and process monitors are used to indicate when the radiation in the area or effluent stream has exceeded its allowable setpoint. There are no safety-related automatic functions assumed in accident analyses that are performed by these instruments. The instruments are not used to mitigate a DBA or transient. These monitors are not used to detect degradation that could lead to leakage from the reactor coolant system (RCS) to the containment atmosphere. The monitored parameters are not process variables used to define the initial conditions of a DBA or transient and these monitors are not devices that provide the primary automatic response to a DBA or transient. Therefore, the area radiation and process monitor CTS requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Consequently, it is acceptable to relocate these requirements to the TRM.

4. Steam Generator (SG) Pressure and Temperature (P/T) Limit

The relocation of the CTS requirements for the SG P/T limit is addressed in DOC 3.4.3-R1 and in ITS application cover letter Appendix A, Justification 4. CTS requirements for the SG P/T limit are found in CTS 15.3.1.B.2 and 15.4.1.A, Table 15.4.1-1 Item 10, check (note 16), and calibration of SG pressure instrumentation.

The limitation on SG P/T ensures that pressure-induced stresses on the SGs do not exceed the maximum allowable fracture toughness limits. These P/T limits are based on maintaining an SG reference temperature-nil ductility temperature (RT_{ndt}) sufficient to prevent brittle fracture. As such, the CTS places limits on variables consistent with structural analysis results. These limits do represent operating restrictions, but not the kind addressed by 10 CFR 50.36(c)(2)(ii), Criterion 2. The Final Policy Statement discussion of Criterion 2 indicates that TSs need only contain those operating restrictions that are required to preclude unanalyzed accidents and transients. Appendix G to 10 CFR Part 50 provides P/T limits for the reactor coolant pressure boundary, and TS requirements for SG tube surveillances ensure the integrity of the boundary between the RCS and the SG boundary. In addition, 10 CFR 50.55a provides requirements for ISI, including the SG. The SG P/T limit does not represent an operating restriction that is an initial condition of a DBA or transient. Therefore, the SG P/T limit CTS requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Consequently, it is acceptable to relocate these requirements to the TRM, where they will be controlled in accordance with 10 CFR 50.59 and 10 CFR 50.55a.

5. Pressurizer Heatup and Cooldown Limits

The relocation of the CTS requirements on pressurizer heatup and cooldown limits is addressed in DOC 3.4.3-R2 and in Appendix A (Justification 5) to the November 15, 1999, application. CTS requirements for pressurizer heatup and cooldown limits are found in CTS 15.3.1.B.3.

Limits are placed on pressurizer operation to prevent a nonductile failure. Although the pressurizer operates at temperature ranges above those for which there is reason for concern about brittle fracture, operating limits are provided to assure compatibility of operation with the fatigue analysis performed in accordance with the American

Society of Mechanical Engineers (ASME) *Boiler and Pressure Vessel Code*, Section III, Appendix G. Thus, temperature limits (heatup and cooldown rates and auxiliary spray temperature differential) of CTS 15.3.1.B.3 are placed on the pressurizer to assure compatibility of operation with the fatigue analysis performed in accordance with the ASME Code requirements. However, a failure of pressurizer integrity would result in an analyzed accident (loss-of-coolant accident (LOCA)) for which adequate mitigation systems and components are provided. The ITS will retain suitable requirements to ensure the operability of these systems. Therefore, the pressurizer heatup and cooldown limits are not relied on to prevent or to mitigate a DBA or transient. Therefore, the requirements specified in CTS 15.3.1.B.3 do not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Consequently, it is acceptable to relocate these requirements to the TRM.

6. Reactor Vessel Head Vent System

The relocation of the CTS requirements for the reactor vessel head vent system is addressed in DOC 3.4.4-R1 and in Appendix A (Justification 3) to the November 15, 1999, application. CTS requirements for the reactor vessel head vent system are found in CTS 15.3.1.A.7, Reactor Coolant Gas Vent System.

The reactor vessel head vents ensure the availability of an exhaust pathway from the RCS to remove noncondensable gases and steam that could inhibit natural circulation core cooling following any event involving a loss of offsite power (LOOP) and requiring long-term cooling, such as a LOCA. The reactor-vessel-head-vents function, capabilities, and testing requirements are consistent with the requirements of Item II.B.l of NUREG-0737, "Clarification of TMI Action Plan Requirements." However, the operation of the reactor vessel head vents is not assumed in the Point Beach safety analysis. This is because the operation of the vents is not part of the primary success path. The system is normally isolated and requires manual operator action to initiate flow. The operation of the reactor vessel head vents is required only when there is indication that natural circulation is not occurring in the reactor vessel, inhibiting heat transfer. Therefore, the reactor vessel head vent system CTS requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Consequently, it is acceptable to relocate these requirements to the TRM.

7. Primary System Testing Following Opening

The relocation of the CTS requirements for primary system testing following opening is addressed in DOC 3.4.13-R1 and in Appendix A (Justification 11) to the November 15, 1999, application. CTS requirements for the primary system testing following opening are found in CTS 15.4.3.

Primary system testing is used to verify the integrity of the primary system after the system is closed following normal opening, modification or repair. These leak testing and weld nondestructive examination requirements do not support any automatic protection functions. They are not used for detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The RCS system integrity requirements (leakage limits and surveillances) are provided as

specific requirements in ITS 3.4.13, ITS 3.4.14, and ITS 3.4.15. Therefore, this CTS SR for primary system testing following opening does not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Consequently, it is acceptable to relocate this requirement to the TRM.

8. Maximum Reactor Coolant Oxygen, Chloride, and Fluoride Concentration for Power Operation

The relocation of the CTS requirements for maximum reactor coolant oxygen, chloride, and fluoride concentration for power operation is addressed in DOC 3.4.16-R1 and in Appendix A (Justification 6) to the November 15, 1999, application. CTS requirements for the maximum reactor coolant oxygen, chloride and fluoride concentration for power operation are found in CTS 15.3.1.E, and CTS 15.4.1.B, Table 15.4.1-2, Item 1, reactor coolant sample requirements for concentrations of chloride (note 8), dissolved oxygen (note 6), and fluoride.

The reactor coolant water chemistry program provides limits on particular chemical properties of the primary coolant, and surveillance practices to monitor those properties to ensure that degradation of the reactor coolant pressure boundary is not exacerbated by poor chemistry conditions. However, degradation of the reactor coolant pressure boundary is a long-term process, and there are other more direct means to monitor and correct the degradation of the reactor pressure boundary which are controlled by regulations and TSs (e.g., ISIs conducted in accordance with 10 CFR 50.55a, and primary coolant leakage limits). The chemistry monitoring activity is of a long-term, preventive purpose rather than mitigative. Therefore, the CTS requirements for maximum reactor coolant oxygen, chloride, and fluoride concentration for power operation do not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Consequently, it is acceptable to relocate these requirements to the TRM.

9. Boric Acid System

The relocation of the boric acid system is addressed in DOC 3.5.2-R1 and in Appendix A (Justification 1) to the November 15, 1999, application. The following are CTS for the boric acid system:

15.3.2	Chemical and Volume Control System (CVCS)
15.3.2.A	LCO for boric acid injection flowpath
15.3.2.B	LCO for CVCS system
15.3.2.C	LCO for CVCS system for two reactor operation
15.3.2.D	Action requirements for CVCS and boric acid systems

15.3.2 Table 15.3.2-1 Boric Acid Storage Tank Min. Volume/Temperature/Concentration

15.4.1.A Table 15.4.1-1 Items:

21. Boric acid control system instrumentation calibration
22. Boric acid tank level instrumentation check and calibration
23. Charging flow instrumentation calibration

15.4.1.B Table 15.4.1-2 Items:

4. Sample test for boric acid tank boron concentration
20. Boric acid storage tank and piping temperature check; note (19)
31. CVCS charging pump flow test; note (17)

The boric acid system ensures negative reactivity control is available for normal operation (normal makeup and chemical shim reactivity control) and provides an alternate method for borating the RCS. However, this system is not assumed to mitigate any DBA or transient. Other systems and components (e.g., safety injection (SI) pumps) and other borated water sources, such as the refueling water storage tank (RWST), are assumed in the safety analysis to supply borated water to the RCS in the event of a DBA. The ITS will retain suitable requirements to ensure the operability of these systems. The boric acid system is not (a) used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA; (b) used to indicate status of, or monitor a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient; or (c) part of a primary success path in the mitigation of a DBA or transient. Therefore, the boric acid system CTS requirements do not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Consequently, it is acceptable to relocate these requirements to the TRM.

10. Refueling Communications

The relocation of the CTS requirements for communication during refueling is addressed in DOC 3.9.1-R1 and in Appendix A (Justification 7) to the November 15, 1999, application. CTS requirements for communication during refueling are found in CTS 15.3.8.6 (LCO) and 15.3.8.9 (action requirements).

Communication between the control room personnel and personnel in containment performing changes in core geometry or core alterations is maintained to ensure that personnel can be promptly informed of significant changes in the plant status or core reactivity condition during refueling. The communications allow for coordination of activities that require interaction between the control room and containment personnel. However, the refueling system DBA or transient response does not take credit for communications. Communications during refueling operations is not a process variable, design feature, or operating restriction that is an initial condition of a DBA or transient. Therefore, the CTS requirements for communication during refueling do not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Consequently, it is acceptable to relocate these requirements to the TRM.

11. Refueling Equipment

The relocation of the CTS requirements for refueling equipment is addressed in DOC 3.9.1-R2 and in Appendix A (Justification 8) to the November 15, 1999, application. CTS requirements for refueling equipment are found in CTS 15.4.1.B, Table 15.4.1-2, Item 14, refueling system interlocks functional test each refueling shutdown.

Operability of the refueling equipment ensures that the equipment used to handle fuel within the reactor pressure vessel functions as designed and that the manipulator crane has sufficient load capacity for handling fuel assemblies and/or control rods. Although the interlocks designed to provide the above capabilities can prevent damage to the refueling equipment and fuel assemblies, they are not assumed to function to mitigate the consequences of a DBA. Therefore, the CTS requirements for refueling equipment do not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Consequently, it is acceptable to relocate these requirements to the TRM.

12. Sealed Radioactive Sources

The relocation of the CTS requirements for sealed radioactive sources is addressed in Appendix A (Justification 12) to the November 15, 1999, application. CTS requirements for refueling equipment are found in CTS 15.4.12, Miscellaneous Radioactive Materials Sources, 15.4.12.A, source leakage test, and 15.4.12.B, SRs.

The limitations on sealed source contamination are intended to ensure that the total body and individual organ irradiation doses do not exceed allowable limits in the event of ingestion or inhalation. This is done by imposing a maximum limitation of < 0.005 microcuries of removable contamination on each sealed source. However, this requirement and the associated SRs bear no relation to the conditions or limitations which are necessary to ensure safe reactor operation. Therefore, the CTS requirements for sealed radioactive sources do not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Consequently, it is acceptable to relocate these requirements to the TRM.

13. Auxiliary Building Crane Lifting Devices

The relocation of the CTS SR for auxiliary building crane lifting devices is addressed in Appendix A (Justification 14) to the November 15, 1999, application. CTS requirements for refueling equipment are found in CTS 15.4.14.

This SR ensures operability of lifting devices and slings prior to heavy loads being carried over fuel stored in the spent fuel pool. This requirement, in conjunction with the single-failure-proof design of the auxiliary building crane, provides assurance that a load drop into the spent fuel pool will not occur. However, these lifting devices are not assumed to function to prevent or mitigate the consequences of a DBA. Therefore, the CTS SR for auxiliary building crane lifting devices does not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Consequently, it is acceptable to relocate this requirement to the TRM.

14. Shock Suppressors (Snubbers)

The relocation of the CTS operability and action requirements for snubbers is addressed in in Appendix A (Justification 13) to the November 15, 1999, application. CTS operability and action requirements for snubbers are found in CTS 15.3.13. Snubbers are also listed in CTS 15.4.2.B.3 as requiring IST, which is redundant to 10 CFR 50.55a.

The snubbers prevent unrestrained pipe motion under dynamic loads that may occur during a seismic event, DBA, or transient. The restraining action of the snubbers ensures that the initiating event failure does not propagate to other parts of the failed system or to other safety systems. Snubbers also allow normal thermal expansion of piping and nozzles to eliminate excessive thermal stresses during heatup or cooldown. Snubber testing is required by 10 CFR 50.55a to be performed in accordance with ASME/ANSI OM Part 4, "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints." Thus, specifying such testing in the TSs is unnecessary. Snubber testing will be adequately controlled in accordance with ITS 5.5.7 and 10 CFR 50.55a. It should be noted that detailed testing requirements for snubbers in CTS 15.4.13 were previously removed by License Amendment Nos. 191 and 196. Snubbers are not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. Snubbers are not a design feature or operating restriction that is an initial condition of a DBA or transient. Snubbers are not part of a primary success path in the mitigation of a DBA or transient. Therefore, the CTS requirements for snubbers do not meet the criteria in 10 CFR 50.36(c)(2)(ii) for retention in the ITS. Consequently, it is acceptable to relocate these requirements to the TRM.

The relocated specifications from the CTS discussed above are not required to be in the TSs because they do not fall within the criteria for mandatory inclusion in the TSs as stated in 10 CFR 50.36(c)(2)(ii). These specifications are not needed to obviate the possibility that an abnormal situation or event will give rise to an immediate threat to the public health and safety. In addition, the NRC staff has concluded that appropriate controls have been established for all of the current specifications and information that are being moved to the FSAR, TRM, ODCM, EM, or IST Program. These relocations are the subject of a new license condition discussed in Section 5.0 of this SE. Until incorporated in licensee-controlled documents, changes to these specifications and information will be controlled in accordance with the current applicable procedures and regulations that control these documents. Following implementation, the NRC may audit the removed provisions to ensure that an appropriate level of control has been achieved. The NRC staff has concluded that, in accordance with the Final Policy Statement, sufficient regulatory controls exist under the regulations, particularly 10 CFR 50.59 and 10 CFR 50.55a. Accordingly, the specifications and information, as described in detail in this SE, may be relocated from the CTS and placed in the licensee-controlled documents identified in the licensee's submittals.

F. Control of Specifications, Requirements, and Information Relocated from the CTS

In the ITS conversion, the licensee will be relocating specifications, requirements, and detailed information from the CTS to licensee-controlled documents outside the CTS. This is discussed in Sections 3.0.D and 3.0.E above. The facility and procedures described in the FSAR and TRM can only be revised in accordance with the provisions of 10 CFR 50.59, which ensures records are maintained and establishes appropriate control over requirements removed from the CTS and over future changes to the requirements. Other licensee-controlled documents contain provisions for making changes consistent with applicable regulatory requirements. For example, the OCDM can be changed in accordance with ITS 5.5.1, and the administrative instructions that implement the QA Plan can be changed in accordance with 10 CFR 50.54(a) and 10 CFR Part 50, Appendix B. The documentation of these changes will be maintained by the licensee in accordance with the record retention requirements specified in the QA Plan and such applicable regulations as 10 CFR 50.59.

The license condition for the relocation of requirements from the CTS, which is discussed in Section 5.0 of this SE, will address the implementation of the ITS conversion and the schedule for the relocation of the CTS requirements into licensee-controlled documents. The relocations to the FSAR, which include the TRM, shall be included in the next required update of the FSAR in accordance with 10 CFR 50.71(e).

G. Evaluation of Other TS Changes (Beyond-Scope Changes) Included in the Application for Conversion to ITS

This section addresses the beyond-scope changes in which the licensee proposed changes to both the CTS and STS.

The changes discussed below are listed in the order of the applicable ITS specification or section, as appropriate. Also provided are references to the associated DOC to the CTS and JFD from the STS given in the licensee's application.

1. ITS 3.3.2 - More Restrictive Action Requirements for Engineered Safety Feature Actuation System (ESFAS) Instrumentation Functions for Steamline Isolation on Manual, High Steam Flow, and High High Steam Flow (DOCs M5 and M7, and JFDs 8 and 9)

   The CTS 15.3.0.A requirements apply in the event of inoperable channels of the engineered safety feature (ESF) actuation instrumentation functions high high steam flow with SI and high steam flow coincident with low T_{avg} with SI for steamline isolation. If the minimum operable channels requirement cannot be met, the CTS would require placing the unit in hot shutdown (subcritical with $T_{avg} > 540°F$) within 8 hours and in cold shutdown (subcritical and $T_{avg} < 200°F$) within 61 hours. The required action for "steamline isolation - manual initiation" requires the unit to be placed in hot shutdown in 8 hours if the minimum operable channels cannot be met. The licensee proposes to adopt STS 3.3.2 Actions D and F for the condition of one inoperable channel of these functions, but with more restrictive completion times. (Adopting action requirements for one inoperable channel is more restrictive than the CTS, which do not limit operation with one inoperable channel of these functions.) Corresponding ITS 3.3.2 Actions D and F will both require restoring the channel to operable status in 1 hour or

placing the unit in Mode 3 in 7 hours and Mode 4 in 13 hours. The NRC staff finds this change acceptable because this is more restrictive than the STS action requirements for (a) one inoperable channel of the manual steamline isolation function that requires restoring the channel to operable status in 48 hours or placing the unit in Mode 3 in 54 hours and Mode 4 in 60 hours (STS Action F); and (b) one inoperable channel of the high steam flow or high high steam flow steam isolation functions that requires placing the channel in trip in 6 hours or placing the unit in Mode 3 in 12 hours and Mode 4 in 18 hours (STS Action D).

2. ITS 3.3.2 - Addition of Exception to Mode 3 Applicability of the ESFAS Instrument Function SI on SteamLine Pressure - Low During RCS Hydrostatic Testing (DOC L3 and JFD 65)

The ESF actuation instrumentation, SG low steam pressure/loop SI, and SG pressure have a permissible bypass condition when the primary pressure is less than 1800 psig. The licensee proposed to modify ITS 3.3.2 to allow RCS hydrostatic testing in Mode 3 without the steamline pressure - low SI function being operable. During the RCS hydrostatic testing, all control rods are inserted and the main steam isolation valves (MSIVs) are closed. With the steamline pressure depressurized and pressurizer pressure greater than 1800 psig, an SI signal would be generated. The NRC staff finds this change acceptable because (a) the steamline pressure - low SI is not needed to protect against a steamline break, feed line break, and inadvertent opening of an SG relief or an SG safety valve accident during the RCS hydrostatic testing since the steamlines are depressurized; and (b) the following other SI functions will be operable during the RCS hydrostatic testing: manual, containment pressure - high, pressurizer pressure - low, and automatic actuation logic and relays.

3. ITS 3.3.2 - Addition of Condensate Isolation Requirements (DOC M10 and JFD 44)

Containment pressure condensate isolation (CPCI) trips the condensate pump and heater drain pumps on high containment pressure (indication of a main steamline break (MSLB) inside containment). This function was added to the Point Beach design after an evaluation of NRC IE Bulletin 80-04 showed that a single failure of a main feedwater regulating valve (MFRV) to close on an SI signal could allow feedwater addition from condensate and heater drain pumps to the faulted SG, leading to containment overpressure. The CPCI function serves as a backup protection function in the event of an MSLB inside containment with a failure of the main feedwater (MFW) lines to isolate.

The licensee proposed to add Function 7 for CPCI to ITS 3.3.2, Table 3.3.2-1. The CPCI function is required to be operable in Modes 1, 2, and 3, except when all MFRVs and associated bypass valves are closed and deactivated. An inoperable channel is required to be placed in the tripped condition within 6 hours or place the unit in Mode 3 in 12 hours and Mode 4 in 18 hours. The CPCI function is not required in Modes 4, 5, and 6 because there is insufficient energy in the secondary side of the unit to have an accident.

Also, the licensee proposed SRs for the following: (1) to perform channel checks once every 12 hours, (2) to perform an actuation logic test every 31 days on a staggered

test basis, (3) to perform a channel operational test (COT) with a 92-day frequency, (4) to perform a master relay test every 18 months, (5) to perform a slave relay test every 18 months, and (6) to perform a channel calibration every 18 months.

The NRC staff finds the proposed changes to be acceptable because these changes associated with CPCI, though not required by the STS or CTS, are more restrictive.

4. ITS 3.3.3 - Addition of Trip Actuating Device Operational Test (TADOT) SR for Containment Isolation Valve (CIV) Position Indication Post Accident Monitoring (PAM) Instrumentation Function (DOC M6 and JFD 27)

The licensee proposed a Channel Check, ITS SR 3.3.3.1, and a TADOT, SR 3.3.3.4, for the CIV position indication PAM instrumentation function. CTS Table 3.5-5 requires PAM CIV position Indication to be operable to provide required information to the operators during accident situations; however, there is no SR stated for PAM CIV position indication in Table 4.1-1 in the CTS. ITS SR 3.3.3.1 requires the channel check every 31 days. ITS SR 3.3.3.4 requires the performance of a TADOT every 18 months. These surveillances are proposed to replace the STS SR to perform channel calibration on the PAM CIV position indication. The TADOT would consist of verifying the valve position indication against the actual position because the CIV position indication has limit switches with no required range or accuracy and is used for indication only. The NRC staff finds the proposed change to be acceptable because this is more restrictive than the CTS, which specify no SRs and because the STS requirement is not appropriate.

5. ITS 3.3.4 - Revised Action Requirements for LOP Diesel Generator (DG) Start and Load Sequence Instrumentation Functions (DOCs L3 and M1, and JFD 3)

The licensee will retain the 7-day LCO for one train of standby emergency power and proposes the STS 2-hour completion time for loss of standby emergency power in both trains. The CTS do not have an LCO for loss of standby emergency power in both trains. The CTS minimum LCO of a single unit is that offsite power be supplied by a single circuit. The CTS minimum LCO of both units is that offsite power be supplied by two circuits. These requirements are established in the LCO by listing the appropriate combination of transformers. These transformers are the XO3 high-voltage station auxiliary transformers (SATs) and the XO4 low-voltage SATs. Also, the CTS have provisions for operation of both units with one XO3 SAT inoperable if the onsite gas turbine is in operation. In this situation, the onsite gas turbine serves in lieu of one of the offsite circuits. The CTS similarly allows operation of one unit without the associated XO3 SAT by using the opposite unit's XO3 SAT and operating the onsite gas turbine. These CTS LCO requirements have been incorporated into the proposed ITS. The licensee proposes to delete the provision to allow operation of one unit at 50-percent power with both XO3 SATs inoperable and the gas turbine as the sole source of power to the safeguard buses. Converting the CTS to ITS will result in:

- Deletion of CTS Table 15.3.5-3, Note*****. This note requires using the three-channels-per-bus specification for each bus that has been converted to 2-out-of-3 logic for the loss-of-voltage protection function. Proposed ITS 3.3.4 requires three operable channels per bus for the loss-of-voltage protection

function. This change is administrative since all buses have been converted to 2-out-of-3 logic for the loss-of-voltage protection function. Accordingly, deletion of this note is acceptable.

- Revision to the Operator Actions of CTS Table 15.3.5-3, Items 4.a.i and 4.a.ii. Table-15.3.5-3, Note *** requires declaring the emergency diesel generator (EDG) bus for the affected bus inoperable when the condition for the operability of the minimum channels is not met; the applicable LCO for degraded voltage and loss-of-voltage functions must then be entered. Proposed ITS 3.3.4, Condition B, is entered with two or more inoperable loss of power (LOP) EDG start-and-load sequence instrumentation channels per bus. Required Action B.1 allows 1 hour to restore all but one channel to operable status. If this required action and the associated completion time are not met, Condition C is entered. Required Action C.1 requires the immediate entry into the applicable condition(s) and required action(s) for the associated EDG made inoperable by LOP EDG start-and-load sequence instrumentation. This change relaxes the current requirements, but is in accordance with the STS and is acceptable.

- Revision to CTS Table 15.3.5-3, Item 4.b.i, “480 V buses (B03, B04) - Loss of Voltage.” This item requires the unit be in hot shutdown in 8 hours if the minimum operable channels requirement cannot be met. This required action is modified by Note*, which requires the unit be in cold shutdown within 48 hours of the event if the minimum conditions are not met within 24 hours after reaching hot shutdown. Proposed ITS LCO 3.3.4 Condition D is entered when two or more 480 V loss-of-voltage channels per bus are inoperable. Required Action D.1 requires the restoration of all but one of the channels within 1 hour. If this action cannot be completed in 1 hour, Condition E is entered, requiring the unit to be in Mode 3 within 6 hours and Mode 5 in 36 hours. On the basis of operating experience, the licensee states that this is a reasonable amount of time to power down without challenging systems. The NRC staff finds this change acceptable.

- Revision to ITS 3.3.4 to reflect the instrumentation used to start the EDGs on LOP and sequence the loads onto the safety-related buses. An undervoltage condition detected on either 4.16 kV bus will start the associated EDG. During a loss of voltage to the safety-related 480 V buses, protective relays initiate load shedding and block automatic SI load sequencing until voltage returns to the buses. This function is necessary to prevent overloading the EDGs. Additionally, the licensee adopted new Conditions D and E to provide actions in the event of inoperable 480 V loss-of-voltage channels. Condition D requires the restoration of all but one inoperable channel within 1 hour. The completion time of 1 hour for restoring all but one inoperable channel should allow ample time to repair most failures.

  Condition E is entered if the required action and associated completion time of Condition A (for the 480 V loss-of-voltage function) or Condition D are not met. Requirement Action E.1 requires the unit to be placed in Mode 3 in 6 hours and Mode 5 in 36 hours. The completion times are reasonable, based on operating

experience, to reach the required unit condition from full power without challenging systems. The NRC staff finds this deviation to be acceptable.

The STS nomenclature for STS 3.3.5, "LOP DG Start Instrumentation," has been changed to "LOP DG Start and Load Sequence Instrumentation" for ITS 3.3.4 to more accurately reflect the functions performed by the 4.16 kV loss of voltage, 4.16 kV degraded voltage, and 480 V loss-of-voltage instrumentation at Point Beach. This change is acceptable.

- Revision to ITS 3.3.4 Required Action A.1 to place an inoperable channel in trip within 1 hour. The Bases discussion of Required Action A.1 states: "With a channel in trip, the LOP DG start instrumentation channels are configured to provide a one-out-of-three logic to initiate a trip..." This statement has been revised to reflect the fact that with one of three channels in trip, the instrument channels are actually in a "one-out-of-two" logic configuration to initiate a trip.

- Elimination of references to "trip setpoint" in ITS SR 3.3.4.3. The setpoint methodology at Point Beach uses allowable values derived from the analytical limits in the safety analysis, is consistent with the STS, and is acceptable.

- Modification to the Bases for ITS 3.3.4 to reflect Point Beach design. The Bases for ITS 3.3.4 discuss LOP start on loss of voltage or degraded voltage "on the safeguards bus." The LOP start is generated on a loss-of-voltage or degraded voltage condition on the safeguard buses, and the deviation is acceptable.

- Revision to the ITS definition of the TADOT to eliminate verification of the setpoint because the CTS do not have this requirement. Therefore, the ITS SR 3.3.4.2 Bases have been modified to reflect this change.

- Adoption of STS 3.3.5, "Loss of power (LOP) diesel generator (DG) and load sequence instrumentation," as ITS 3.3.4. ITS 3.3.4, "Remote Shut down System," has not been adopted as part of the Point Beach ITS conversion because the Point Beach CTS does not contain any specifications which require operability of instrumentation or controls associated with the remote shutdown panel. Therefore, since the remote shutdown system specification is not adopted as part of the Point Beach ITS conversion, STS 3.3.5 is renumbered as ITS 3.3.4. This is acceptable. Also, the STS title of LCO 3.3.5, "LOP DG Start Instrumentation," has been changed to "LOP DG Start and Load Sequence Instrumentation," in ITS 3.3.4 to more accurately reflect the functions of the 4.16 kV degraded voltage and 4.16 kV and 480 V loss-of-voltage instrumentation at Point Beach. This change is administrative in nature and therefore acceptable.

- Renumbering of STS 3.3.5 as ITS 3.3.4. Renumbered ITS 3.3.4 is changed to reflect the instrumentation used at Point Beach to start the DGs on LOP and sequence the loads onto the safety buses. The brackets have been removed and the number of channels per safety bus, including the proper plant-specific safety bus information, is given for the required instrumentation.

CTS Table 15.3.5-3 contains requirements for minimum operable channels, permissible bypass conditions, and operator actions if conditions cannot be met. Items 4.a and 4.b of Table 15.3.5-3 have notes limiting unit operation. Proposed ITS 3.3.4 combines these requirements by specifying the number of required channels for each function to be operable and required operator actions. Therefore, the following requirements in Table 15.3.5-3, Items 4.a and 4.b, for the number of channels required to be operable (column 2) are now included in ITS 3.3.4: (a) 4.16 kV bus loss of voltage, (b) 4.16 kV bus degraded voltage, and (c) 480 V bus loss of voltage. An undervoltage condition (loss of, or degraded voltage) condition on either 4.16 kV bus will start the associated safety DG. However, during a loss of voltage to the safety-related 480 V buses, protective relays initiate load shedding and block automatic SI load sequencing until voltage returns to the buses. This function is necessary to prevent overloading of the DGs. ITS 3.3.4 has been changed to ITS 3.3.4.a, ITS 3.3.4.b, and ITS 3.3.4.c. to reflect the instrumentation used at Point Beach for minimum operable channels to reflect the requirements of Table 15.3.5-3, Items 4a.i, 4.a.ii and 4.b.i. This change is acceptable because it includes the appropriate number of operable channels and instruments used at Point Beach to start the DGs on LOP.

Proposed ITS 3.3.4 states the number of channels required for each function to meet operability requirements and avoid taking required actions to mitigate the conditions. The Operator Actions given in CTS Table 15.3.5-3 for Items 4.a.i, 4.a.ii, and 4.b.i are transferred to the Actions section of ITS 3.3.4.

- Transfer of the Actions section of ITS 3.3.4, Condition B, is changed to include the 4.16 kV buses for loss-of-voltage and degraded voltage functions. This change adds plant-specific information on the safety buses for Condition B. Also, the Operator Actions of CTS Table 15.3.5-3, Items 4.a.i and 4.a.ii, have been revised to conform to ITS 3.3.4, Condition B. Table 15.3.5-3, Note ***, requires the associated standby emergency power supply for the affected bus be declared inoperable and subsequent entry into the applicable LCO. Proposed ITS 3.3.4, Condition B, is entered when two or more 4.16kV loss-of-voltage or 4.16 kV degraded voltage channels per bus are inoperable. Required Action B.1 allows 1 hour to restore all but one channel to operable status. If this required action and associated completion time are not met, Condition C is entered. Required Action C.1 requires the immediate entry into the applicable condition(s) and required action(s) for the associated standby emergency power source made inoperable by LOP DG start instrumentation. This change is a relaxation of the current requirement contained in CTS Table 15.3.5-3, Note ***, which does not allow 1 hour for restoration to operable status as in Required Action B.1. This poses minimal risk because of the low probability of an event requiring LOP start during the additional 1 hour. Further, the proposed adoption to ITS 3.3.4, Condition B, is in accordance with the guidance given in NUREG-1431. Therefore, the revision is acceptable.

- Revision of the Actions section of ITS 3.3.4, Condition C, to include the words “of Condition A for 4.16 kV Functions or Condition B.” This change of Condition C adds plant-specific information on the safety buses for Condition A

or Condition B. In addition, the ITS 3.3.4 reference to "DG" has been changed to "standby emergency power source," to be consistent with current Point Beach nomenclature. These changes to ITS 3.3.4, Condition C, add plant-specific information on safety buses and are consistent with current Point Beach nomenclature. These changes are acceptable since they add plant-specific nomenclature of the safety buses used at Point Beach and clarify the specifications without altering the original intent of the specifications.

- Condition D has been added to the Actions section of ITS 3.3.4 to provide actions for inoperable 480 V loss-of-voltage channels. This requirement is currently covered in CTS Table 15.3.5-3, Item 4.b.i, "480 Volt Buses (B03, B04) - Loss of Voltage," which requires that the unit be in hot shutdown in 8 hours if the minimum operable channels requirement cannot be met. This required action is changed by Note *, which requires that the unit be in cold shutdown within 48 hours of the event if the minimum conditions are not met within 24 hours after reaching hot shutdown. Proposed ITS 3.3.4, Condition D, is entered when two or more 480 V loss-of-voltage channels per bus are inoperable. Required Action D.1 requires the restoration of all but one inoperable channel within 1 hour. The completion time of 1 hour for restoring all but one inoperable channels should allow ample time to repair most failures and takes into account the low probability of an event requiring an LOP start and load sequence during this interval. However, if this condition cannot be completed in 1 hour, Condition E is entered. Condition E has been added to the Actions section of ITS LCO 3.3.4 to provide actions if the required action and associated completion time of Condition A for 480 V loss-of-voltage function or Condition D are not met. Required Actions E.1 and E.2 require the unit to be placed in Mode 3 (hot shutdown) in 6 hours and Mode 5 (cold shutdown) in 36 hours respectively. The addition of Conditions D and E to the Actions section of proposed ITS 3.3.4 adds restrictions on unit operation based on plant operating experience to reach the required unit condition from full power conditions in an orderly manner and without challenging unit systems. The completion times proposed for Conditions D and E are more restrictive than those of CTS Table 15.3.5-3, Item 4.b.1, and are therefore acceptable.

6. <u>ITS 3.4.3 and ITS 5.6.5 - Establishment of the PTLR and Addition of SR to Verify RCS P/T, and RCS Heatup and Cooldown Rates Are Within Limits of the PTLR (DOCs M1, LA1, and LA2, and JFD 2)</u>

   - <u>Establishment of the PTLR</u> - The licensee submitted a separate application dated March 10, 2000, as supplemented on July 28, November 20, 2000, and April 10, 2001, requesting implementation of a PTLR concurrent with ITS implementation. The TS changes associated with adoption of the PTLR are discussed in Item 19 of Section G of this SE. This beyond-scope change encompasses PTLR-related TS changes that differ from the STS PTLR.

   - <u>SR 3.4.3.1</u> - The licensee proposes to adopt STS SR 3.4.3.1, but with a difference in the associated note. Corresponding ITS SR 3.4.3.1 requires the licensee to verify that RCS pressure, temperature, and heatup and cooldown rates are within the limits specified in the PTLR. The note to STS SR 3.4.3.1

states that the SR is only required to be performed during RCS heatup and cooldown operations, and during RCS inservice leak and hydrostatic testing. The note in ITS SR 3.4.3.1 would include an additional condition to require the performance of the SR when $k_{eff} < 1.0$. The effect of the proposed change is to delete the requirement for the licensee to perform ITS SR 3.4.3.1 when $k_{eff} \geq 1.0$.

Proposed ITS 3.4.2, "RCS Minimum Temperature for Criticality," requires each RCS loop average temperature (T_{avg}) to be $\geq$ 540 °F when the plant is in Mode 1 or when the plant is in Mode 2 with $k_{eff} \geq 1.0$. In addition, proposed ITS Table 1.1-1, "MODES," and ITS 3.9.1, "Boron Concentration," require that k_{eff} be less than 1.0 in all modes other than Modes 1 and 2. Therefore, the combination of ITS 3.4.2, ITS Table 1.1-1, and ITS 3.9.1 proposed by the licensee requires $T_{avg} \geq$ 540 °F whenever $k_{eff} \geq 1.0$. Based on the above, the proposed change to delete the requirement for the licensee to perform ITS SR 3.4.3.1 when $k_{eff} \geq 1.0$ translates to deletion of the requirement when the plant is in Modes 1 or 2 and $T_{avg} \geq$ 540 °F.

As stated in the Bases for ITS 3.4.3, "RCS Pressure and Temperature (P/T) Limits" establish operating limits that provide a margin to brittle failure of the reactor vessel and piping of the reactor coolant pressure boundary. However, it is also states that Modes 1 and 2, which include plant configurations with T_{avg} of 540 °F, are above the temperature range of concern for nonductile (i.e, brittle) failure. Based on the Bases for ITS 3.4.3, ITS SR 3.4.3.1 is not necessary from the standpoint of protection against brittle failure when $T_{avg} \geq$ 540 °F.

The NRC staff has reviewed the change proposed to the note in SR 3.4.3.1. Based on (1) the Bases for ITS SR 3.4.3.1 being to protect the reactor coolant pressure boundary against brittle failure, (2) proposed ITS 3.4.2, ITS Table 1.1-1, and ITS 3.9.1, which together require $T_{avg} \geq$ 540 °F whenever $k_{eff} \geq 1.0$, and (3) the RCS average temperature of 540 °F being above the temperature range of concern for brittle failure of the reactor coolant pressure boundary, the NRC staff finds the licensee's proposed change acceptable.

7. ITS 3.4.5 - Increased Operability and SRs for RCS Loops (DOCs M1 and M3, and JFD 2)

In Mode 3, the CTS require one reactor coolant pump (RCP) be in operation and one SG be operable. The ITS add the requirement that two RCS loops be operable, which means two RCPs and two SGs are required to be operable, and one of the RCS loops must be in operation. Only one RCS loop is required to be in operation in Mode 3 to provide sufficient flow to ensure adequate boron mixing and decay heat removal. With reactor trip breakers in the closed position and the rod control system capable of rod withdrawal, accidental control rod withdrawal from a subcritical condition is postulated and requires one RCS loop to be operable and in operation to ensure that the accident analysis limits are met. Two RCS loops are required to be operable to provide redundant capability for decay heat removal. The STS requirement that two RCS loops be in operation when the rod control system is capable of rod withdrawal is not applicable to the Point Beach accident analysis, and therefore is not included in the

ITS. ITS Actions A, B, and C, associated Completion Times, and SRs 3.4.5.1, 3.4.5.2, and 3.4.5.3 are added to be consistent with the plant's accident analysis and the STS. This change is consistent with the plant safety analysis and is therefore acceptable.

8. ITS 3.4.15 - Addition of Explicit Operability, Action, and SRs for the Containment Sump Monitor (DOC M2 and JFD 1)

The RCS leakage detection systems must have the capability to detect significant reactor coolant pressure boundary degradation as soon after occurrence as practical to minimize the potential for propagation to a gross failure. STS 3.4.15 requires that one containment sump (level or discharge) monitor and one containment atmosphere radioactivity monitor (gaseous or particulate) be operable during power operation. These instruments of diverse monitoring principles provide a high degree of confidence that extremely small leaks are detected in time to allow actions to place the plant in a safe condition when RCS leakage indicates possible reactor coolant pressure boundary degradation. The licensee proposed to use one containment sump level alarm system and one containment atmosphere radioactivity monitor. The containment sump high level alarm alerts operators to significant increases in condensate flow from the containment air cooler units, which is equivalent to one containment sump (level or discharge) monitor. Thus, the containment sump level alarm, in combination with a gaseous or particulate radioactivity monitor, meets the LCO requirements. The NRC staff finds this proposal acceptable.

9. ITS 3.5.3 - Additional Requirement to Meet Surveillances for Auto Actuation of Emergency Core Cooling System (ECCS) Valves and Auto Start of ECCS Pumps in Mode 4 (DOC M3 and JFD 9)

ITS SR 3.5.3.1 requires meeting ITS SR 3.5.2.3 and SR 3.5.2.4 during Mode 4 operation for all ECCS equipment required to be operable in Mode 4. These SRs have an 18-month frequency and are normally performed during refueling outages, consistent with CTS 15.4.5.I.A.1 and CTS 15.4.5.I.A.2, but are not currently required to be met during the range of plant conditions covered in ITS Mode 4, which is consistent with STS SR 3.5.3.1. ITS SR 3.5.2.3 requires verifying that each ECCS automatic valve in the flow path that is not locked, sealed, or otherwise secured in position, actuates to the correct position on an actual or simulated actuation signal. ITS SR 3.5.2.4 requires verifying that each ECCS pump starts automatically on an actual or simulated actuation signal. ITS SR 3.5.3.1 requires meeting these SRs in Mode 4 to ensure consistency in SI instrumentation and equipment operability requirements. For example, ITS 3.3.2 Table 3.3.2-1, Function 1.a, requires the automatic SI logic for the SI manual actuation instrument function to be operable in Mode 4. In addition, the ITS and STS Bases for these SRs state that the actuation logic is tested as part of the ESFAS testing. This deviation from the STS and change in CTS ECCS operability requirements between 200 °F and 350 °F, are acceptable because they are consistent with plant design and safety analysis assumptions regarding the start of ECCS pumps and actuation of valves in the SI flow paths upon receipt of an SI actuation signal in Mode 4.

10. ITS 3.7.2 - Changes to MSIV and NonReturn Check Valve Action Requirements (DOCs L1, M1, M2, M4, and M5, and JFD 1)

STS 3.7.2 is written for a typical design in which each main steamline contains a single MSIV, which is a gate valve. This valve closes when called upon and stops flow in either direction through the line. The Point Beach plant uses a different arrangement. Each main steamline contains two valves. One valve is a type of check valve that can be held open by an operating mechanism, or can be allowed to be forced closed by flow through the line, like a simple check valve, which is called the MSIV. This valve is normally held open during plant operation, but, when released, will close to prevent flow out of the containment.

The other valve in the line is a simple check valve oriented in the opposite direction from the first valve so that it stops flow into the containment. It is called the nonreturn check valve. During normal operation, the nonreturn check valve is held open by the flow of steam out of the containment, but, during certain off-normal conditions, it closes. For example, during an MSLB inside containment, it prevents flow into the containment from the other SG and the steam piping outside containment, thus limiting the amount of steam mass and energy put into the containment atmosphere and ultimately limiting the peak P/T in the containment. In the Point Beach design, therefore, both valves in each line are needed to be able to stop flow in either direction, whereas the typical design accomplishes this with a single gate valve. Thus, Point Beach's combination of the MSIV and the nonreturn check valve is functionally equivalent to a single MSIV of the gate-valve type.

The CTS for Point Beach allow one of the four valves (one MSIV and one nonreturn check valve in each of two main steamlines) to be inoperable for up to 4 hours. If not restored in 4 hours, then the plant must be in Mode 3 (hot standby) in the following 6 hours. Operation in Mode 3 may continue indefinitely with one to four valves inoperable, provided that they are closed; otherwise, CTS 3.0.3 will require a shutdown to Mode 5 (cold shutdown).

The STS allow up to 8 hours for one inoperable MSIV in a main steamline. If not restored in 8 hours, then the plant must be in Mode 2 (startup) in the following 6 hours. Operation in Mode 2 or 3 may continue indefinitely with one or more of these valves inoperable (with a separate condition entry allowed), provided that they are closed; otherwise, the plant must be in Mode 3 in the next 6 hours and Mode 4 (hot shutdown) in the following 6 hours.

The proposed ITS allow up to 8 hours for one or two inoperable valves on the same main steamline. If not restored in 8 hours, then the plant must be in Mode 2 in the following 6 hours. Operation in Mode 2 or 3 may continue indefinitely with one or more of these valves inoperable (with separate condition entry allowed), provided that they are closed; otherwise, the plant must be in Mode 3 in the next 6 hours and Mode 4 in the following 6 hours.

Given the functional equivalence of Point Beach's combination of an MSIV and a nonreturn check valve, when compared to a single MSIV of the gate-valve type, the NRC staff finds that the proposed ITS are equivalent to the STS, modified to fit

Point Beach's arrangement of valves. The proposed ITS are less restrictive than the CTS in that there is a relaxation of the actions required to exit the applicability, and a relaxation of the completion times. The NRC staff finds that they are acceptable on the bases described below:

- Relaxation of Actions Required to Exit Applicability - The CTS require that in the event specified LCOs are not met, penalty factors to reactor operation, such as resetting setpoints and power reductions, shall be initiated as the method to reestablish the appropriate limits. The ITS are constructed to specify actions for conditions of required features made inoperable. Adopting ITS action requirements for exiting LCO applicabilities is acceptable because the plant remains within analyzed parameters by performance of required actions, or the actions are constructed to minimize risks associated with continued operation while providing time to repair inoperable features. Such actions add margin to safety or verify equipment status such as interlock status for the mode of operation, thereby providing assurance that the plant is configured appropriately or operations that could result in a challenge to safety systems are exited in a time period that is commensurate with the safety importance of the system. Additionally, other changes to TS actions include placing the reactor in a mode where the specification no longer applies, usually resulting in an extension to the time period for taking the plant into shutdown conditions. These actions are commensurate with industry standards for reductions in thermal power in an orderly fashion without compromising safe operation of the plant.

  The proposed ITS for the MSIVs are equivalent to the STS, and, on the basis provided above, the relaxation of actions required to exit applicability (compared to CTS) is acceptable.

- Relaxation of Completion Time - Upon discovery of a failure to meet an LCO, the STS specify times for completing required Actions of the associated TS conditions. Required Actions of the associated conditions are used to establish remedial measures that must be taken within specified completion times (allowed outage times). These times define limits during which operation in a degraded condition is permitted.

  Adopting completion times from the STS is acceptable because completion times take into account the operability status of the redundant systems of TS-required features, the capacity and capability of remaining features, a reasonable time for repairs or replacement of required features, and the low probability of a DBA occurring during the repair period. The proposed changes for the MSIVs are consistent with the STS, and the proposed allowed outage time extensions are acceptable.

Based on the foregoing evaluation, the NRC staff finds the proposed TS changes to be acceptable.

11. ITS 3.7.3 - Addition of Operability, Action, and SRs for MFW Isolation Valves (DOC M1, M3, and M4, and JFD 1)

CTS 4.1.A requires that MFW isolation on SI be required at all plant conditions and testing be performed each refueling interval. MFW isolation at Point Beach is provided by the MFW regulating valves or bypass valves. In the event of a main feed regulating valve or bypass valve failing to close, auto trip of the MFW pumps will terminate MFW flow to the SG at normal operating pressures, with termination of the MFW flow at reduced SG pressures accomplished by the CPCI circuit, which trips the condensate and heater drain pumps. The licensee proposed to make the MFW isolation applicable in Modes 1, 2, and 3; this is when there is significant mass and energy in the SGs in the event of MSLB inside containment. In addition, the licensee proposed to have LCOs for the following: (1) inoperability of one or more MFW regulating valves and bypass valves, (2) inoperability of the MFW pump trip and CPCI condensate and heater drain pump trips, (3) and the simultaneous inoperability of one or more unisolated inoperable MFW regulating or bypass valves with one or more operating MFW, condensate, or heater drain pumps with inoperable trip systems. Also, the licensee proposed SRs for the following: (1) to verify auto closure capability of the MFW regulating and bypass valves, (2) to verify the MFW pumps will auto trip on an actuation signal, and (3) to test the CPCI circuit that trips the condensate and heater drain pumps on a containment high pressure signal. These SRs are proposed to be performed at least once every 18 months. This represents a more restrictive change. The revised requirement appears as ITS 3.7.3. The NRC staff finds the proposed change to be consistent with STS; therefore, this change is acceptable.

12. ITS 3.7.4 - Changes to Atmospheric Dump Valve (ADV) Flow Path Action and SRs (DOCs L2 and M1, and JFDs 1 and 3)

At Point Beach, there are two SGs on each unit and one ADV and one ADV block valve per SG. The ADVs are air-operated, fail-closed valves with the capability to be remotely opened and closed or manually operated locally. The ADV block valves have no power operators and are manually operated locally. Local manual operation of the ADVs is credited during the SG tube rupture (SGTR) event coincident with a LOOP. The ADV block valves are credited with isolation of a failed-open ADV, but are not credited for reestablishing ADV flow for the mitigation of an SGTR/LOOP event.

The ADVs are ASME *Boiler and Pressure Vessel Code*, Class 2 valves and are required by 10 CFR 50.55a to be tested in accordance with Section XI of the ASME Code. The ASME Code, Section XI, testing does not encompass local manual operation, and the CTS does not contain an SR for local manual testing of either the ADVs or the ADV block valves. The licensee proposes to delete the power-operated stroke test requirement from the TSs since it duplicates the ASME Code, Section XI, testing. The licensee proposes to add SRs 3.7.4.1 and 3.7.4.2 to verify local manual operation capability. The proposed SRs will require local manual stroke testing of the ADVs and ADV block valves, with or without steam flow, at an 18-month frequency.

The NRC staff has determined that it is acceptable to remove the quarterly ADV power-operated stroke testing requirement from CTS 15.4.1, Table 15.4.1-2, Item 28,

since this requirement is duplicated by testing required by the plant IST Program. Since the valves are in the IST Program and are required to be stroke tested with the power operators quarterly, the inclusion of the same test in the CTS adds no additional testing requirement. Testing performed on the ADVs to satisfy IST requirements adequately demonstrates the operability of the power-operated function of the valves.

In reviewing proposed SRs 3.7.4.1 and 3.7.4.2 for manually stroke testing the ADVs and the ADV block valves, with or without steam flow, the NRC staff identified a concern that the proposed testing would not verify the capability of the valves to perform their safety functions for the required accident steam flow conditions. With steam flow discharge through the ADV flowpaths, the forces required to manually operate the ADVs or the ADV block valves would be significantly greater than with no steam flow.

To address the concern regarding verifying the capability of the ADVs to be operated with steam flow, the licensee stated that in June 1996, a test of the manual closure capability of the ADVs was performed under steam flow conditions. The licensee states that this one-time test, together with proposed SR 2.7.4.1, will verify the capability of the ADVs. The NRC staff finds that the June 1996 manual closure test adequately demonstrates the ability of the ADVs to be stroked under system pressure and steam flow conditions. Also, the proposed periodic manual stroke test is sufficient to identify possible degradation and verify the full stroke disk movement of the ADVs. In addition, the proposed 18-month frequency for performing manual stroke testing of the ADVs is acceptable to the NRC staff based on the acceptable performance of similar valves tested at this frequency.

The licensee submitted an analysis based on an acceptable methodology to address the NRC staff's concern regarding verifying the capability of the ADV block valves to be closed with steam flow. In this analysis, the licensee calculated the required thrust to close the block valves based on a steam differential pressure of 1085 psi and a bounding valve factor of 0.65 for this particular size and model valve. The thrust calculation also included steam packing friction and stem pressure ejection terms. The licensee used a stem factor of 0.0137 to determine the required hand wheel torque and calculated the maximum torque as 320 foot-pounds. The licensee stated that there are no valve components that cannot withstand the loads necessary for closing the valves and that manual closure may require the use of a valve wrench (extension tool) to obtain the necessary mechanical advantage. The NRC staff reviewed this calculation and determined that it is a conservative estimate of the required torque to close the block valves. Since the hand wheel radius is only 10.5 inches, the NRC staff expects it is likely that an extension tool would be required to close the block valves since, without such a tool, the required maximum force on the handwheel would be approximately 366 foot-pounds (i.e., force = torque/radius). Recognizing that an extension tool would be required, the NRC staff finds that the licensee has adequately demonstrated the ability of the ADV block valves to be manually stroked under system pressure and steam flow conditions. Also, the proposed periodic manual stroke test is sufficient to identify possible degradation and verify full stroke disk movement of the ADV block valves. In addition, the proposed 18-month frequency for performing manual stroke testing of the ADV block valves is

acceptable to the NRC staff based on the acceptable performance of similar valves tested at this frequency.

Since the ADV block valves are gate valves, the NRC staff initially had a concern that if they are required to be reopened after being closed to isolate a failed-open ADV, they could be subject to thermal binding of the disks as the valves cool down or could be subject to pressure locking due to trapped pressurized fluid in the valve bonnet. However, in the February 23, 2001, supplemental submittal, the licensee addressed this concern by revising the proposed ITS such that the ADV block valves are only credited with isolation of a failed-open ADV and will not be credited for reestablishing ADV flow for the mitigation of an SGTR/LOOP event. The licensee stated that if it is necessary to close an ADV block valve to isolate a failed-open ADV, that ADV flowpath will be considered inoperable. The NRC staff has determined that this is acceptable for addressing the NRC staff's concern regarding thermal binding and pressure locking by justifying that the ADV block valves do not need to be reopened if they are closed to isolate a failed-open ADV.

In summary, the NRC staff has reviewed the licensee's proposed ITS changes to the SRs for the plant's ADVs and ADV block valves and finds them to be acceptable. Specifically, the NRC staff has determined that it is acceptable to remove CTS 15.4.1, Table 15.4.1-2, Item 28, power-operated stroke test, since this requirement is duplicated by the requirements of the plant IST Program. In addition, together with the demonstration test and analysis information discussed above, proposed SRs 3.7.4.1 and 3.7.4.2 are acceptable for periodically verifying the operability of the manually-operated function of the ADVs and ADV block valves.

13. <u>ITS 3.7.5 - Changes to Auxiliary Feedwater (AFW) System Nomenclature and Changes to Frequency of AFW System SRs (DOCs A1, L5, M4, and M6, and JFDs 1 and 19)</u>

The AFW system at Point Beach consists of four pumps; one turbine driven pump for each unit and two shared motor driven pumps. Each motor driven AFW pump can supply 100 percent of the AFW system design flow rate to either unit. Motor-driven AFW pump P-38A supplies the "A" SG in both units while motor-driven AFW pump P-38B supplies the "B" SGs. Each turbine-driven AFW pump is capable of supplying 200 percent of the design AFW flow rate and supplies both SGs of its respective unit. The AFW pumps are fed from a common suction header from the condensate storage tanks. The service water system also provides the backup, safety-related source of water for the AFW system.

The licensee has proposed the following deviations from the STS for the AFW system at Point Beach:

- Proposed ITS 3.7.5 refers to "AFW pump systems" instead of "AFW trains" as specified in STS;

- Proposed ITS SR 3.7.5.5 conditions performance of the AFW flow path alignment verification "prior to Thermal Power exceeding 2% [rated thermal power] RTP" instead of "prior to entering Mode 2" as specified in STS; and

- Proposed ITS SR 3.7.5.2 Note differs from the STS by allowing turbine-driven pump flow (head) test and start test to be performed 24 hours after thermal power ≥2 percent RTP instead of "within 24 hours after ≥ 1000 psig in the steam generator."

The licensee stated that only the motor-driven AFW pumps use the "train" designation. The turbine-driven pump system is not referred to as a train. As such, the licensee has determined that referring to AFW pump systems rather than AFW trains reflects the actual configuration of the AFW system at Point Beach. The licensee proposed that ITS 3.7.5 state "The AFW System shall be OPERABLE with: one turbine driven AFW pump system and two motor driven AFW pump systems." The NRC staff finds the proposed change of nomenclature acceptable.

In response to RAIs regarding the proposed SR 3.7.5.5 frequency, the licensee modified ITS SR 3.7.5.5 to be consistent with the Point Beach CTS. The revision to the proposed ITS SR 3.7.5.5 frequency states that "Prior to THERMAL POWER exceeding 2% RTP whenever unit has been in Mode 5, Mode 6, or defueled for a cumulative period of > 30 days." Since the proposed ITS SR 3.7.5.5 frequency meets the current licensing basis, the NRC staff finds the proposed change acceptable.

In response to RAIs regarding notes for ITS SR 3.7.5.2 and ITS SR 3.7.5.4, the licensee proposed the following two modifications:

(1) ITS SR 3.7.5.2 Note has been changed to reflect the allowance of the current licensing basis. The revision to the proposed SR 3.7.5.2 Note is as follows: "Not required to be performed for the turbine driven AFW pump until 24 hours after THERMAL POWER exceeds 2% RTP." Since the proposed ITS SR 3.7.5.2 Note meets the current licensing basis, the NRC staff finds the proposed change acceptable.

(2) ITS SR 3.7.5.4 Note has been changed to be consistent with the STS. The revision to the proposed ITS SR 3.7.5.4 Note states the following: "Not required to be performed for the turbine driven AFW pump until 24 hours after ≥1000 psig in the steam generator." The proposed change is consistent with the STS and is therefore acceptable.

14. <u>ITS 3.7.7 - Changes to Component Cooling (CC) System Operability and Action Requirements (Beyond-Scope Change 74) (DOCs M1, M2, M4, and M5, and JFD 1)</u>

The licensee has proposed the following changes to Section 3.7.7 that differ from the STS:

- The licensee has proposed a component approach versus the system-based approach used in the STS.

- An additional 144-hour completion time is added for an inoperable heat exchanger or inoperable pump, for the case that multiple entries to LCO 3.7.7 are necessary.

- The shutdown schedule provided by the STS is adopted into the ITS for the case where LCO 3.7.7 completion times are not met.

- A note is added to clarify that entry into LCO 3.4.6, “RCS Loops - MODE 4," is required for a residual heat removal (RHR) loop made inoperable by the CC system.

- A monthly surveillance is added that requires verification of correct positioning for manual, power-operated, and automatic valves in flow paths serving safety-related equipment.

- Component-based Approach of ITS Section 3.7.7 - Where applicable, STS requirements have been written using a systems-based approach, and requirements are generally provided on a “per train” basis. The licensee, however, has chosen not to adopt this approach for ITS Section 3.7.7. Instead, the licensee has proposed a “per component” approach which is similar to that of the CTS. Therefore, instead of a single LCO entry condition based upon an inoperable CC train, proposed ITS LCO 3.7.7 contains entry conditions for both an inoperable pump and an inoperable heat exchanger.

  In the Bases for the proposed ITS, the licensee has specified that the inoperability of any CC system component which renders a CC pump or heat exchanger unable to perform its design function would result in the affected CC pump or heat exchanger being declared inoperable. Thus, proposed LCO 3.7.7 accounts for the necessary components for the CC system functionality via the Bases. The NRC staff finds the licensee’s component-based approach to be appropriate because of the shared nature of the CC system at Point Beach. The component-based approach is acceptable because it is an alternate way of presenting the action requirements for ITS Section 3.7.7.

- CTS Requirements to be Relocated to ITS Bases - The licensee has proposed to relocate two conditions to the Bases, which must be satisfied before the reactor may be made critical:

  (1) Three CC heat exchangers must be operable for two-unit operation.

  (2) All valves, interlocks, and piping associated with the CC system that are required during accident conditions must be operable.

  The Bases specify the required number of heat exchangers for various operational circumstances, and proposed ITS LCO 3.7.7 provides Required Actions if any required heat exchanger is inoperable. It would therefore be unnecessary to include in the ITS-specific details and conditions concerning which or how many heat exchangers must be operable before the reactor may be made critical.

  The details pertaining to the surge tank, valves, interlocks, piping, and controls associated with the CC system have been transferred to the Bases. Based on proposed ITS LCO 3.7.7 and Bases, in Modes 1, 2, 3, and 4, the inoperability of any CC system component which renders a CC pump or heat exchanger unable to perform its design function would result in the affected pump or heat exchanger being declared inoperable. The proposed ITS requirement would encompass and expand upon the CTS requirement. Relocation of this CTS requirement to the Bases is also consistent with the strategy and formatting of the STS.

Based on the above, the NRC staff finds the relocation of these CTS conditions to the Bases to be acceptable.

- STS Requirements Omitted from ITS Section 3.7.7 - The proposed ITS omit STS requirements for two functions which are not relied upon by the Point Beach accident analysis to perform safety-related functions or for CC system operability. The two omitted requirements are the following:

  (1) an LCO and SR for the CC system automatic nonessential load isolation valves

  (2) an SR to verify the CC pumps' automatic start function

  The licensee had originally proposed ITS requirements concerning the automatic function of the Unit 2 CC system nonessential load isolation valves. These valves have the capability of isolating nonessential CC system loads from the Unit 2 CC system essential loads. Closure of the nonessential load isolation valves following a break in the nonseismically qualified, nonessential portion of the CC system ensures that the seismically qualified portion of the Unit 2 CC system will have sufficient inventory to cool its essential loads. However, following its original submittal, the licensee performed an analysis which determined that the automatic closure of these valves is not required for the CC system to perform its design function. Though these valves enhance CC system integrity, their automatic closure is not credited for the mitigation of any analyzed accident. The Point Beach FSAR states in Section 9.1 that manual action, including completely securing the CC system for repairs, is the analyzed method for CC System restoration, even under DBA conditions. Therefore, since the automatic function of the non-essential load isolation valves is not required to support CC system operability, an LCO and SR are not required in the ITS.

  The automatic start function of the CC pumps is provided for operational convenience and is not relied upon by the licensee's safety analysis. If a LOOP occurs coincident with an SI signal, for example, the automatic start signal to the CC pumps is blocked. The licensee has stated that the CC pumps are not needed to support accident mitigation during the SI phase of a DBA. The Point Beach safety analysis credits operator action with ensuring that the CC system is operating to perform its safety-related functions during the recirculation phase of a DBA. Therefore, because the CC pump automatic start signal is not relied upon to perform a safety-related function, an SR for this signal is not required in the ITS.

- The Additional 144-Hour Completion Times - The proposed ITS add an additional 144-hour completion time for an inoperable heat exchanger or an inoperable pump for the case where multiple entries into LCO 3.7.7 would be necessary. The CTS does not contain a specific condition or limitation addressing multiple sequential inoperabilities of the CC system. The ITS proposes a completion time limit of 144 hours of the first component becoming inoperable. The limit of 144 hours is the summation of the pump and heat exchanger completion times allowing the full completion time for each condition (pump or heat exchanger) only once, when multiple condition entry occurs.

The addition of this completion time is an additional restriction not contained in the existing TSs and is consistent with other LCOs in NUREG 1431 that present the potential for multiple sequential inoperabilities within the same LCO. Since this is the addition of a restriction that is not in the CTS and it is consistent with similar LCOs in the STS, the NRC staff finds this additional completion time acceptable.

15. ITS 3.7.9 - Additional SR for Control Room Emergency Filtration System (CREFS) (DOC 3.7.10 - M3) (JFD 3.7.10 - 1 and 6)

The licensee stated in JFD 1 to STS 3.7.10 that "CREFS does not automatically restart after being load shed following a loss of offsite power; manual action is required to restart CREFS. . . ." Therefore, the licensee proposed to add SR 3.7.9.5, which is not contained in the STS. The proposed SR requires verification of CREFS manual start and realignment capability every 18 months. The licensee further stated in DOC 3.7.10 - M3 that "The proposed frequency for this surveillance is consistent with that specified for manual action testing of the CREFS in NUREG 1431, and is considered acceptable based on the inherent reliability of manual actuation circuits." The NRC staff reviewed the proposed SR and finds it acceptable because it is a conservative change and is adequate to assure the operability of the CREFS manual start and manual system realignment capability.

16. ITS 3.6.5 - Revised Containment Air Temperature Limit (DOCs A1 and M1, and JFD 2)

The licensee has proposed ITS 3.6.5, "Containment Air Temperature." The licensee has proposed an action requirement for ITS 3.6.5 for containment average air temperature to be equal or less than 120 °F to obtain peak accident P/T when compared to the CTS Bases for Section 4.4, which uses an initial air temperature of 105 °F.

Proposed ITS 3.6.5 provides assurance that the containment air temperature limit is maintained. Proposed ITS 3.6.5 establishes a containment average air temperature limit of 120 °F consistent with the accident analysis, in addition to appropriate Conditions and Requirement Actions if temperature is found to be outside of the limit, and an SR to periodically verify compliance with the limit. The LCO, Conditions and Required Actions, and SRs proposed are appropriate for Point Beach and are consistent with the STS.

The NRC staff has reviewed the licensee's submittals and Point Beach FSAR Section 14.3.4, "Containment Integrity Evaluation," for assumed containment initial air temperature. The NRC staff finds proposed ITS 3.6.5 for containment average air temperature and the associated Bases are consistent with the containment analysis of record and the STS, and is therefore acceptable.

17. ITS 3.9.5 - Addition of SR to Verify One RHR Loop is in Operation in Mode 6 (DOC M3 and JFD 4)

The CTS do not have an SR that addresses RHR flow in Mode 6. ITS SR 3.9.5.1 is added to demonstrate that one RHR loop is in operation and circulating reactor coolant. Verification includes flow rate, temperature, or pump status monitoring. The flow rate for the RHR loop in operation specified in the corresponding STS SR 3.9.5.1 has not been adopted. For Point Beach, the boron dilution accident is the only accident postulated to occur in Mode 6, which assumes that the RHR system is in operation. The accident analysis only assumes that there is some mixing of the borated coolant as a result of the RHR pump being in operation and does not specify a flow rate. There is no analytical basis for inclusion of the flow rate. The frequency of 12 hours for this SR is acceptable considering the continuous indications of RHR flow available to the operator in the control room. This change is consistent with the plant safety analysis and the current licensing basis, and is therefore acceptable.

18. ITS 5.6.4 - COLR (DOC 3.4.1 LA1)

The licensee submitted a separate application on March 2, 2000, as supplemented August 14, 2000, requesting implementation of a COLR concurrent with ITS implementation so it is being incorporated into the ITS amendment. The proposed changes would relocate cycle-specific parameters from the CTS to the COLR and establish administrative control requirements for the COLR in ITS 5.6.4.

GL 88-16, “Removal of Cycle-Specific Parameter Limits from Technical Specifications,” provides guidance for licensees to allow relocation of cycle-dependent variables from the TSs. This guidance contains the following criteria necessary for acceptance: (a) the values of these cycle-dependent variables are included in a COLR; (b) the values of these cycle-dependent variables are determined with NRC-approved methodologies referenced in the TSs; (c) changes are reported to the NRC staff as they are made; and (d) the appropriate safety limits would be maintained in the TSs.

The licensee proposed to relocate the following cycle-specific parameter values to the COLR, omitting them in the listed ITS Specifications:

3.1.1 Shutdown Margin
3.1.3 Moderator Temperature Coefficient (MTC)
3.1.5 Shutdown Bank Insertion Limit
3.1.6 Control Bank Insertion Limits
3.2.1 Height Dependent Heat Flux Hot Channel Factor (F_Q)
3.2.2 Nuclear Enthalpy Rise Hot Channel Factor ($F^N_{\Delta H}$)
3.2.3 Axial Flux Difference
3.9.1 Refueling Boron Concentration

The NRC staff previously approved relocation of these parameters to the COLR for Westinghouse plants. In addition, these parameters, as well as the NRC-approved analytical methods used to determine them, will be referenced in the COLR section of the ITS. Therefore, the relocation of these parameters to the COLR is acceptable.

Also, the licensee proposes to relocate the following reactor core safety limit curves from ITS 2.1 to the COLR and replace them with the following departure from nucleate boiling ratio (DNBR) design limits (as per supplement to the November 15, 1999, ITS conversion application) and fuel centerline melt temperature limits:

DNBR $\geq$ 1.22/1.21 (typical/thimble) for the WRB-1 correlation for cores not containing 422V+ fuel.
DNBR $\geq$ 1.24/1.23 (typical/thimble) for the WRB-1 correlation for cores containing 422V+ fuel.

OR

DNBR $\geq$ 1.30 for the W-3 correlation when system pressure is > 1000 psia.
DNBR $\geq$ 1.45 for the W-3 correlation when system pressure is $\geq$ 500 psia and $\leq$ 1000 psia.

In addition, the following peak fuel centerline temperature limit will be added:

T < 5080 °F, decreasing by 58 °F per 10,000 MWD/MTU of burnup

The relocation of the reactor core safety limit curves to the COLR and their replacement by the DNBR limits and peak fuel centerline temperature limits in the safety limit TS was approved by the NRC staff as described in WCAP-14483-A, "Generic Methodology for Expanded Core Operating Limits Report." The COLR reactor core safety limit curves will be referenced by ITS 2.1.1. Therefore, these proposed changes are acceptable.

The relocation of the cycle-specific, departure-from-nucleate-boiling parameters related to RCS temperature, pressure, and flow from ITS 3.4.1 to the COLR is also proposed. As stated in WCAP-14483-A, the relocation of these parameters to the COLR has been approved by the NRC staff with the provision that the minimum staff-approved flow limits be retained in the TSs. Therefore, the licensee proposes to retain the following RCS design minimum flow limits in ITS 3.4.1:

RCS flow $\geq$ 182,400 gpm

These proposed changes conform to WCAP-14483-A; therefore, they are acceptable.

The licensee proposes to relocate the overtemperature and overpower ΔT setpoint parameters and function modifiers to the COLR. The relocation of these parameters to the COLR has previously been approved by the NRC and is therefore acceptable.

19. ITS 5.6.5 - Addition of a Pressure Temperature Limits Report (PTLR)

The licensee submitted a separate application dated March 10, 2000, as supplemented July 28, 2000, November 20, 2000, and April 10, 2001, requesting implementation of a PTLR concurrent with ITS implementation so it is being incorporated into the ITS amendment. The proposed changes would relocate RCS

pressure temperature limit curves and low temperature overpressure protection (LTOP) system limits from the TSs to a PTLR.

All components of the RCS are designed to withstand the effects of cyclic loads resulting from system P/T changes. These loads are introduced by heatup and cooldown operations, power transients, and reactor trips. In accordance with Appendix G to 10 CFR Part 50, the TSs limit the P/T change during RCS heatup and cooldown within the design assumptions and the stress limits for cyclic operation. These limits are defined by the P/T-limit curves for heatup and cooldown. Each curve defines an acceptable region for normal operation. The curves are used for operational guidance during heatup and cooldown maneuvering, when P/T indications are monitored and compared to the applicable curve to determine that operation is within the allowable region.

The implementation of the PTLR will be in a two-step licensing process. The first step utilizes the calculated fluence values (without adjustments) to estimate material properties and will be valid for operation of Unit 1 until October 30, 2003, and Unit 2 until October 1, 2008. This corresponds to 25.59 effective full power years (EFPYs) of operation for Unit 1 and 30.51 EFPYs for Unit 2. The second step will occur when the FERRET code is reviewed and approved by the NRC staff, which should extend the time limit for the fluence values. In its March 10, 2000, application, the licensee calculated 32.2 EFPYs for Unit 1 and 34.0 EFPYs for Unit 2. However, these values were calculated using the FERRET code to adjust the measured and calculated data. The FERRET code has not been reviewed and approved by the NRC, therefore it cannot be used to calculate the data.

The licensee used the ASME *Boiler and Pressure Vessel Code*, Code Case N-641, and requested an exemption from 10 CFR 50.60 and Appendix G to 10 CFR Part 50. Code Case N-641 deviates from 10 CFR Part 50, Appendix G, and 10 CFR 50.60, in two areas: (1) The postulation of a circumferentially oriented flaw in lieu of an axially oriented flaw for the evaluation of reactor pressure vessel (RPV) circumferential welds, and (2) the use of K_{IC} fracture toughness curve instead of K_{Ia} fracture toughness curve for RPV materials in determining the P/T limits. The exemption to permit use of Code Case N-641 was granted on October 6, 2000, for Point Beach.

The licensee has proposed to change the LTOP setpoint from 440 psig to 500 psig. The actuation of a power-operated relief valve (PORV) during an increasing pressure transient will result in the RCS pressure increase being slowed and reversed. The RCS pressure will then decrease and continue to undershoot below the PORV reset pressure as the valve recloses. This pressure undershoot is typically a consideration in establishing the PORV setpoint for the protection of the RCP no. 1 seal. This is to ensure that, as a result of pressure undershoot, the RCS pressure remains above the minimum pressure required to maintain a nominal differential pressure across the seal faces for proper film-riding performance. Since the proposed LTOP setpoint of 500 psig is higher than the current setpoint, the proposed LTOP setpoint is acceptable in the aspect of pump seal operation consideration.

The LTOP enable temperature is determined based on the limiting axial and circumferential adjusted reference temperatures (ART) for the two units. According to ASME Code Case N-641, the LTOP enable temperature may be determined as the greater of an RCS temperature of 200 °F or a coolant temperature corresponding to a reactor vessel metal temperature. The enable temperature is also adjusted for the maximum 1/4T temperature lag of 20.1 °F at 100 °F/hr heatup rate and a temperature instrument uncertainty of 17.8 °F. The calculation results in Attachment 5 to the licensee's March 10, 2000, application, CALCULATION 2000-0001-00, "RCS Pressure-Temperature Limits and LTOP Setpoints Applicable Through 32.2 EFPY - Unit 1 and 34.0 EFPY - Unit 2," show that the enable temperature is 270 °F for Unit 1, and 224.9 °F for Unit 2. Therefore, the licensee proposed enable temperature of 270 °F for both units is the higher value of the enable temperatures of the two units, and is acceptable.

The licensee has proposed the following TS changes associated with the incorporation of a PTLR:

- Addition of Definition of PTLR: The proposed TS amendment would add the definition of PTLR in ITS Definitions Section 1.1. Attachment 1 to the March 10, 2000, application provides the proposed definition. It defines the PTLR as the unit-specific document that provides the reactor vessel P/T limits, including heatup and cooldown rates, and the PORV lift settings and enable temperature associated with the LTOP system, for the current reactor vessel fluence period. This definition is consistent with the definition in NUREG 1431 and appropriately addresses what is required in the PTLR in accordance with GL 96-03. Therefore, this definition is acceptable.

- Addition of Reporting Requirement on PTLR: The proposed amendment would add an administrative reporting requirement regarding the PTLR to ITS Administrative Control Section 5.6.5, "Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)." This section specifies that RCS P/T limits for heatup, cooldown, low temperature operation, criticality, hydrostatic testing, LTOP enabling, and PORV lift settings, as well as heatup and cooldown rates, shall be established and documented in the PTLR. The requirement also specifies that (1) the analytical methods used to determine the RCS P/T limits shall be those previously reviewed and approved by the NRC, specifically, WCAP-14040-NP-A, "Methodology Used to Develop Cold Overpressure Mitigating System Setpoints and RCS Heatup and Cooldown Limit Curves," Revision 2, dated January 1996, and (2) the PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

  The NRC staff finds that the proposed reporting requirement is consistent with NUREG-1431, as well as the guidance of GL 96-03. The addition of this requirement ensures that the RCS P/T limits and LTOP limits are determined in accordance with approved methodologies, and reactor operation will continue to meet all regulatory and design-basis requirements. Therefore, this proposed addition is acceptable.

- Relocation of RCS P/T Limits to PTLR: The proposed amendment would relocate the following TS items to the PTLR: (1) CTS 15.3.1.B.1.a, b, and c pertaining to the RCS heatup and cooldown rate limits and associated P/T limits curves shown in CTS Figures 15.3.1-1 and 15.3.1-2, and (2) CTS 15.3.1.B.4 pertaining to reactor vessel irradiation surveillance specimens. In addition, the P/T limits on CTS Figures 15.3.1-1 and 15.3.1-2 are replaced with new curves based on new analyses.

  In Revision 1 to the proposed PTLR (Attachment 3 to the licensee's November 20, 2000, supplemental letter), the licensee provides (1) the heatup and cooldown rate limits and the P/T limits effective through 25.59 and 30.51 EFPYs for Units 1 and 2, respectively, (2) the LTOP enable temperature, (3) the LTOP PORV lift setpoint, and (4) the reactor vessel material surveillance program. Supplemental information is also included in the proposed PTLR, such as the fluence values and ARTs for various reactor vessel components materials. The relocation of the P/T limits to the PTLR is implemented consistent with the guidance of GL 96-03, and is acceptable.

- Revisions to Pressurizer Safety Valve LCO: The proposed amendments would delete TS 15.3.1.A.4.a, which requires at least one pressurizer safety valve (PSV) to be operable whenever the reactor head is on the vessel. The amendment would also change the CTS 15.3.1.A.4.b (ITS 3.4.10) applicability requirement for two PSVs to be operable from "whenever the reactor is critical" to "whenever the RCS temperature is $\geq$ the LTOP enable temperature specified in the PTLR."

  The licensee stated that these PSV requirements in the CTS predate the TS requirements for LTOP. The PSVs were considered the primary protection for the RCS from overpressurization prior to the inclusion of LTOP requirements in the CTS. After the LTOP system was added and to the Point Beach TSs and implemented, the PSVs were no longer required for protection of the RCS below the LTOP enable temperature when the PORVs are relied upon for LTOP protection. Therefore, the PSV LCO could have been changed to only require operability of the PSVs when the RCS conditions equal or exceed the LTOP enable temperature.

  The NRC staff finds that the proposed changes on the PSV LCO are consistent with the requirements of LCO 3.4.10 in NUREG-1431. The LTOP system, with proper PORV lift setpoints, provides proper RCS LTOP when the system is enabled. As part of this proposed change, when the RCS temperature is $\geq$ LTOP enable temperature, two PSVs are required to be operable. Therefore, deletion of the requirement to have one PSV operable is acceptable.

- Relocation and Revision of LTOP Enable Temperature: ITS 3.4.12 would contain the following proposed CTS 15.3.15 changes: (1) relocation of the LTOP system applicability, (2) relocation of the LTOP system operability, and (3) revision of the reactor coolant temperature limitations for starting an RCP from "< 355 deg-F" to "< the LTOP enable temperature specified in the PTLR." The PTLR would specify the LTOP enable temperature, which would be reduced from 355 °F to 270 °F for the fluence values specified in the PTLR.

  The reduction in the LTOP enable temperature from 355 °F to 270 °F is based on a new analysis documented in Point Beach Calculation 2000-0001-00, which is found in Attachment 5 to the licensee's application dated March 10, 2000. As described earlier, the NRC staff has found that the LTOP enable temperature of 270 °F is acceptable for the fluence values in Calculation 2000-0001-00. The relocation of the LTOP enable temperature from the CTS to the PTLR, as well as the relocation of P/T limits and the LTOP setpoint to the PTLR, is consistent with the guidance of GL 96-03; therefore, these TS changes are acceptable.

- Relocation and Revision of LTOP PORV Setpoint: The proposed TS changes would revise the LTOP PORV setpoint in CTS 15.3.15.A.1.a from "of $\leq$ 440 psig" to "within the limits of the PTLR" in ITS 3.4.12.c.1. The PTLR would specify the LTOP setpoint, which would be revised from 440 psig to 500 psig for the fluence values specified in the PTLR.

  The relocation of the LTOP setpoint from TSs to the PTLR is consistent with the guidance of GL 96-03 and is therefore acceptable.

- Addition of TS Requirement for Accumulator Isolation: The proposed amendment would add a requirement to CTS 15.3.15.B.1 (ITS 3.4.12.) that each accumulator whose pressure is greater than or equal to the maximum RCS pressure for existing cold leg temperature allowed in the PTLR should be isolated.

  The proposed change is more restrictive because it establishes system alignment requirements that do not exist in the CTS. This system alignment limitation for the accumulators eliminates the need to consider accumulator injection for LTOP. This is consistent with LTOP design-basis analyses, and is therefore acceptable.

Relocation of the P/T limits, LTOP limit, LTOP enable temperature and LTOP PORV setpoint does not eliminate the requirement to operate in accordance with the limits specified in Appendix G to 10 CFR Part 50. The requirement to operate within the limits in the PTLR is specified in, and controlled by, the TS. Only the figures, values, and parameters associated with the P/T limits and LTOP setpoints are to be relocated to the PTLR. In order for the curves to be relocated to a PTLR, a methodology for their development must be reviewed and approved in advance by the NRC. The methodology to be approved by the NRC is to be developed in accordance with GL 96-03. This GL provides guidance regarding referencing the methodology and development of the PTLR including, but not limited to, the requirements of Appendix G to 10 CFR Part 50. Since the methodology is referenced in the TS, changes to the

methodology must be approved by the NRC. Further, when changes are made to the figures, values, and parameters contained in the PTLR, the PTLR is to be updated and submitted to the NRC upon issuance.

On this basis, the NRC staff concludes that the licensee provided an acceptable means of establishing and maintaining the detailed values of the P/T and LTOP limits. Further, because plant operation continues to be limited in accordance with the requirements of 10 CFR Part 50 Appendix G and the P/T and LTOP limits in the TS will be established using a methodology approved by the NRC, these changes will not impact safety.

The NRC staff also concludes that the above-relocated requirements relating to the P/T limits and LTOP limits are not required to be in the TS under 10 CFR 50.36, and are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. Accordingly, the NRC staff concludes that the proposed changes are acceptable and that these requirements may be relocated from the TS to the PTLR.

A detailed discussion of the NRC staff's basis for acceptance of the licensee's proposed methodology is provided in the letter from C. Craig, NRC, to M. Reddemann, NMC, "Point Beach Nuclear Plant, Units 1 and 2 - Acceptance of Methodology for Referencing Pressure Temperature Limits Report," dated July 23, 2001.

4.0 COMMITMENTS RELIED UPON

In reviewing the proposed ITS conversion for Point Beach, the NRC staff has relied upon the licensee's commitment to relocate certain requirements from the CTS to licensee-controlled documents as described in Table R, "Relocated Specifications and Removal of Details" (Attachment 5 to this SE). This table reflects the relocations described in the licensee's submittals on the conversion. The NRC staff requested and the licensee submitted a license condition to make this commitment enforceable (see Section 5.0 of this SE). Such a commitment from the licensee is important to the ITS conversion because the acceptability of removing certain requirements from the TS is based on those requirements being relocated to licensee-controlled documents where further changes to the requirements will be controlled by regulations or other requirements (e.g., in accordance with 10 CFR 50.59).

5.0 LICENSE CONDITIONS

License conditions to define the schedule to begin performing the new and revised SRs after implementation of the ITS are included in Appendix C of the Operating License. These conditions are:

- For SRs that are new in this amendment, the first performance is due at the end of the first surveillance interval that begins on the date of implementation of this amendment.

- For SRs that existed prior to this amendment, whose intervals of performance are being reduced, the first reduced surveillance interval begins upon completion of the first surveillance performed after implementation of this amendment.

- For SRs that existed prior to this amendment that have modified acceptance criteria, the first performance is due at the end of the first surveillance interval that began on the date the surveillance was last performed prior to the implementation of this amendment.

- For SRs that existed prior to this amendment, whose intervals of performance are being extended, the first extended surveillance interval begins upon completion of the last surveillance performed prior to the implementation of this amendment.

The NRC staff has reviewed the above schedule for the licensee to begin performing the new and revised SRs and concludes that it is an acceptable schedule.

Also, a license condition is to be included that will enforce the relocation of requirements from the CTS to licensee-controlled documents. The relocations are described in Table R (Attachment 5 to this SE), and Section 3.0.D, “Removed Details," and Section 3.0.E, “Relocated Specifications,” above. The license condition states that the relocations would be completed no later than December 31, 2001. This schedule is acceptable.

As a part of the ITS conversion, the licensee also proposed to delete two existing license conditions related to compliance with CTS reporting and record retention requirements. These two conditions, 3.C and 3.D, are no longer necessary because they are duplicative of regulations regarding reporting and recordkeeping. They are also duplicative of License Condition 3.B, “Technical Specifications,“ which requires that NMC operate the facility in accordance with the TSs. Many of the CTS requirements that these two conditions refer to are being relocated out of the ITS to licensee-controlled documents, as specified in the conversion submittal and supplements thereto. Therefore, deletion of these two license conditions will have no impact on the reporting and recordkeeping requirements for Point Beach, and is acceptable.

6.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Wisconsin State official was notified on June 27, 2001 of the proposed issuance of the ITS conversion amendment for Point Beach. The State official had no comments.

7.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR 51.21, 51.32, and 51.35, an environmental assessment and finding of no significant impact was published in the *Federal Register* on July 23, 2001 (66 FR 38329), for the proposed conversion of the CTS to ITS for Point Beach. Accordingly, based upon the environmental assessment, the Commission has determined that issuance of these amendments will not have a significant effect on the quality of the human environment.

With respect to other changes included in the application for conversion to ITS, the items change requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendments required by these other changes involve no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission issued proposed findings that the amendments required by these other changes

involve no significant hazards consideration, and there has been no public comment on these findings published in the *Federal Register* on June 22, 2001 (66 FR 33581); August 9, 2000 (65 FR 48740), and August 23, 2000 (65 FR 51364). Accordingly, these changes meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the implementation of these changes.

8.0 CONCLUSION

The Point Beach ITS provides clearer, more readily understandable requirements to ensure safe operation of the plant. The NRC staff concludes that the ITS for Point Beach satisfy the guidance in the Final Policy Statement on TS improvements for nuclear power reactors with regard to the content of TS, and conform to the STS provided in NUREG-1431, Revision 1, with appropriate modifications for plant-specific considerations. The NRC staff further concludes that the ITS satisfy Section 182a of the Atomic Energy Act, 10 CFR 50.36, and other applicable standards. On this basis, the NRC staff concludes that the proposed ITS for Point Beach are acceptable.

The NRC staff has also reviewed the plant-specific changes to the CTS as described in this SE. On the basis of the evaluations described herein for each of the changes, the NRC staff also concludes that these changes are acceptable.

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner; (2) such activities will be conducted in compliance with the Commission's regulations; and (3) the issuance of the amendment will not be inimical to the common defense and security, or to the health and safety of the public.

Attachments:
1. List of Acronyms
2. Table A - Administrative Changes
3. Table M - More Restrictive Changes
4. Table L - Less Restrictive Changes
5. Table R - Relocated Specifications and Removed Details

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LIST OF ACRONYMS

AC	Air Conditioning or Alternating Current
ADV	Atmospheric Dump Valve
AFD	Axial Flux Difference
AFW	Auxiliary Feedwater System
AOT	Allowed Outage Time
APRM	Average Power Range Monitor
ART	Adjusted Reference Temperature
ASME	American Society of Mechanical Engineers
ASTM	American Society for Testing and Materials
ATWS	Anticipated Transient Without Scram
CC	Component Cooling Water
CW	Circulating Water
CFR	Code of Federal Regulations
CFT	Channel Functional Test
CIV	Containment Isolation Valve
COLR	Core Operating Limits Report
CPCI	Containment Pressure Condensate Isolation
CRD	Control Rod Drive
CREFS	Control Room Emergency Filtration System
CRVS	Control Room Ventilation System
CRWA	Control Rod Withdrawal Accident
CST	Condensate Storage Tank
CTS	Current Technical Specification
CVCS	Chemical and Volume Control System
DBA	Design-Basis Accident
DG	Diesel Generator
DNB	Departure from Nucleate Boiling
DOC	Discussion of Change (from the CTS)
ECCS	Emergency Core Cooling System
EDG	Emergency Diesel Generator
EFPY	Effective Full Power Year
EM	Environmental Manual
EPA	Electrical Protection Assembly
ESFAS	Engineered Safety Features Actuation System
FSAR	Final Safety Analysis Report
FR	Federal Register
ISI	Inservice Inspection
IST	Inservice Testing
ITS	Improved Technical Specification
JFD	Justification for Deviation
kV	Kilovolt
kW	Kilowatt
LCO	Limiting Condition for Operation
LOCA	Loss-of-Coolant Accident
LOOP	Loss of Offsite Power
LOP	Loss of Power

LPRM	Local Power Range Monitor
LSFT	Logic System Functional Test
LTOP	Low Temperature Overpressure Protection
MFRV	Manual Feedwater Regulating Valve
MFW	Main Feedwater
MG	Motor Generator
MSIV	Main Steam Isolation Valve
MTC	Moderator Temperature Coefficient
MWD/T	Megawatt Days/short Ton
NMC	Nuclear Management Company, LLC
ODCM	Offsite Dose Calculation Manual
PAM	Post-Accident Monitoring
PBNP	Point Beach Nuclear Plant
PIV	Pressure Isolation Valve
P/T	Pressure/Temperature
PORV	Power Operated Relief Valve
PTLR	Pressure Temperature Limits Report
PWR	Pressurized Water Reactor
QA	Quality Assurance
QPTR	Quadrant Power Tilt Ratio
RAI	Request for Additional Information
RBM	Rod Block Monitor
RCPB	Reactor Coolant Pressure Boundary
RCS	Reactor Coolant System
RG	Regulatory Guide
RHR	Residual Heat Removal
RPS	Reactor Protection System
RPV	Reactor Pressure Vessel
RSCS	Rod Sequence Control System
RTB	Reactor Trip Breaker
RTP	Rated Thermal Power
RWST	Reactor Water Storage Tank
SAT	Station Auxiliary Transformer
SCIV	Secondary Containment Isolation Valve
SDC	Shutdown Cooling
SDM	Shutdown Margin
SDV	Scram Discharge Volume
SE	Safety Evaluation
SER	Safety Evaluation Report
SI	Safety Injection
SG	Steam Generator
SGTR	Steam Generator Tube Rupture
SR	Surveillance Requirement
SRM	Source Range Monitor
SRV	Safety/Relief Valve
SSER	Supplemental Safety Evaluation Report
STS	Improved Standard Technical Specification, NUREG-1431, Rev. 1
SW	Service Water

TADOT	Trip Actuating Device Operational Test
TRM	Technical Requirements Manual
TS	Technical Specification
TSTF	Technical Specifications Task Force (re: generic changes to the STSs)
UHS	Ultimate Heat Sink
FSAR	Final Safety Analysis Report
V	Volt
WEPCo	Wisconsin Electric Power Company