

December 19, 2001

Mr. Mano Nazar  
Site Vice President  
Prairie Island Nuclear Generating Plant  
Nuclear Management Company, LLC  
1717 Wakonade Drive East  
Welch, MN 55089

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION REGARDING THE APPLICATION FOR CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS, SECTION 3.4 (TAC NOS. MB0695 AND MB0696)

Dear Mr. Nazar:

By application dated December 11, 2000, as supplemented March 6, June 5, July 3, August 13, and November 12, 2001, Nuclear Management Company, LLC, submitted a license amendment request to convert the current Technical Specifications (TSs) for the Prairie Island Nuclear Generating Plant, Units 1 and 2, to a set of improved TSs (ITS).

Enclosed is the Nuclear Regulatory Commission staff's request for additional information (RAI) on Section 3.4, "Reactor Coolant Systems," of the subject ITS submittal. The contents of the enclosed RAI have been previously forwarded to Mr. Dale Vincent of your staff to facilitate any questions or clarifications on the RAI. Subsequent dialogues have clarified the NRC staff's understanding on a number of items, and thus requires no further information as noted in the enclosure. For the rest of the items in the enclosure, please respond within 60 days from the date of this letter.

Please contact me on (301) 415-1392 if you have any questions regarding this RAI.

Sincerely,

*/RA/*

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

Docket Nos. 50-282 and 50-306

Enclosure: Request for Additional Information

cc w/encl: See next page

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Units 1 and 2

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PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2  
REQUEST FOR ADDITIONAL INFORMATION  
ITS SECTION 3.4, REACTOR COOLANT SYSTEM (RCS)

1. ITS SR 3.4.1.3 Note  
X3.4-104

STS SR 3.4.1.4 is modified by a Note that allows entry into MODE 1, without having performed the SR, and placement of the unit in the best condition for performing the SR. The Note states that the SR is not required to be performed until 24 hours after  $\geq$ [90%] RTP. ITS SR 3.4.1.3 Note is modified to state "Required to be performed within 7 days after  $\geq$  90% RTP." X3.4-104 states that 7 days "is sufficient time to perform the necessary calculations and allow any potential RCS fluctuations following the startup to stabilize and provide more accurate determinations." Seven days appears to be an extremely long period of time to be operating in MODE 1 without verifying the total RCS flow rate, especially since CL3.4-103 stated that the control board flow meters do not provide sufficient resolution to measure the specified values.

**Comment:** Maintain the STS wording or provide historical plant data and any risk assessment insights to support the proposed 7 day allowance for meeting the surveillance requirement. As proposed, this is a generic change to NUREG-1431 which requires the Westinghouse Owners Group approval.

2. ITS SR 3.4.1.3  
PA3.4-106

STS SR 3.4.1.4 requires the verification "by precision heat balance that RCS total flow rate is  $\geq$  [284,000] gpm and greater than or equal to the limit specified in the COLR." ITS SR 3.4.1.3 would not specify the method by which the verification of the RCS total flow rate would be performed. PA3.4-106 states that the phrase "by precision heat balance" is not included because the CTS does not specify a particular method for performing RCS flow test. The method of performing the RCS flow test should be included in the ITS SR 3.4.1.3.

**Comment:** Maintain the STS wording or provide the method of performing the RCS total flow test in ITS SR 3.4.1.3 that is acceptable to the staff.

3. CTS 3.10.J

CTS 3.10.J title has been changed from "DNB Parameters" to "RCS Pressure, Temperature and Flow DNB Limits." No discussion of change was provided for the change in title. Also, the new title is missing a '-' that was added to ITS 3.4.1.

**Comment:** Provide a discussion of change for the CTS 3.10.J title.

ENCLOSURE

4. ITS LCO 3.4.2  
ITS SR 3.4.2.1

ITS LCO 3.4.2 and SR 3.4.2.1 have replaced the bracketed 541°F with 540°F. No JFD was provided for the change.

**Comment:** Provide the JFD for the proposed change.

5. CTS 3.1.B.1.b  
M3.4-62  
ITS 3.4.3 Action A.2

CTS 3.1.B.1.b states that if the conditions cannot be satisfied, the following must be done: 1) restore the temperature and/or pressure to within the limits within 30 minutes, 2) perform an engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the RCS, and 3) determine that the RCS remains acceptable for continued operation. ITS 3.4.3 Actions A.1 and A.2 require that the parameters are restored within limits in 30 minutes and determine that the RCS is acceptable for continued operation. ITS 3.4.3 Actions A.1 and A.2 does not account for the engineering evaluation to determine the effects of the out-of-limit condition on the structural integrity of the RCS. M3.4-62 discusses the addition of the 72 hour time limit to the CTS for evaluating the structural integrity of the RCS. This does not appear to be correct. M3.4-62 should discuss the addition of the 72 hour time limit being added to the CTS for determining that the RCS structural integrity remains acceptable for continued operation which would be consistent with ITS 3.4.3 Action A.2. The CTS description of performing an engineering evaluation should be added to the ITS 3.4.3 Bases as added detail.

**Comment:** Correct M3.4-62 to include discussion to reflect the time allowance is added for the purpose of determining whether the RCS structural integrity remains acceptable for continued operation. Add the description of the engineering evaluation to the ITS 3.4.3 Bases and mark up the CTS to show where this requirement is going to be located.

6. CTS 3.1.A.1.a(1)  
ITS LCO 3.4.4

CTS 3.1.A.1.a(1) states that the reactor shall not be made or maintained critical unless both reactor coolant loops (with their associated steam generator and reactor coolant pump) are in operation, except 1) during low power PHYSICS TESTS. The exception to CTS 3.1.A.1.a(1) does not appear in ITS LCO 3.4.4 although it is depicted this way on the marked up CTS.

**Comment:** Deletion of the CTS phrase “except during low power PHYSICS TESTS” needs to be evaluated in a discussion of change for ITS.

7. ITS SR 3.4.5.2  
X3.4-121

STS SR 3.4.5.2 requires the verification of steam generator secondary side water levels to be  $\geq$  [17]% for required RCS loops. ITS SR 3.4.5.2 would require verification of steam generator secondary side water levels to be  $\geq$  60% (Wide Range) for both RCS loops. ITS SR 3.4.5.2 is not consistent with the CTS (new SR) or STS.

**Comment:** ITS SR 3.4.5.2 is beyond scope.

8. CTS 3.1.A.1.b(3)(a)  
ITS 3.4.5 Action D.1

CTS 3.1.A.1.b(3)(a) requires the immediate de-energization of all control rod drive mechanisms when both RCPs are inoperable or not in operation. ITS 3.4.5 Action D.1 requires that the Rod Control System be placed in a condition incapable of rod withdrawal, immediately. Since there are a variety of ways to make the rod control system incapable of rod withdrawal, the requirements of CTS 3.1.A.1.b(3)(a) and ITS 3.4.5 Action D.1 are not the same. The requirements of ITS 3.4.5 Action D.1 are a less restrictive change. No discussion of differences was provided for this change.

**Comment:** Provide DOC for ITS 3.4.5 Action D.1 as a less restrictive change.

9. CTS 3.1.A.1.b(3)\*  
L3.4-23  
ITS 3.4.5 Note

CTS 3.1.A.1.b(3)\* allows both RCPs not in operation for up to 12 hours for preplanned work activities. This was approved by the staff in Licence Amendments 152/143 for Prairie Island Units 1 and 2. This allowance is also proposed in ITS 3.4.5 Note. L3.4-23 proposes to add the statement "De-energizing control rods is not required for preplanned work activities" to allow for additional tests in this 12 hour time period. However, the staff credited the de-energization of all control rod drive mechanisms as part of its approval of CTS 3.1.A.1.b(3)\*. Adding the phrase proposed by L3.4-23 invalidates part of the staff's approval in its SER.

**Comment:** This is a beyond scope issue.

10. ITS 3.4.6 Note 1  
PA3.4-120

ITS 3.4.6 Note 1 states that all RCPs and RHR pumps may be not in operation for  $\leq$  1 hour per 8 hour period. PA3.4-120 adds an additional comment to the note which states that all RCPs and RHR pumps may be not in operation for  $\leq$  1 hour per 8 hour period to perform tests. This additional phrase is not in the CTS or the STS. However, the additional phrase is discussed in the ITS 3.4.6 Bases. Requirements cannot be stated in the Bases. Additionally, the Bases Control Program controls future Bases changes to ensure the meaning of LCOs are not changed as a result of Bases changes.

**Comment:** Retain the STS 3.4.6 Note 1 wording.

11. ITS 3.4.6 Actions A, B, and C  
CTS 3.1.A.1.e(2) and (3)  
TSTF-263 R3  
CL3.4-113

ITS 3.4.6 Actions A, B, and C provide the required actions when two loops (RCS or RHR) are not operable and one loop is not in operation in MODE 4. ITS 3.4.6 Actions A, B, and C are similar to CTS 3.1.A.1.e(2) and e(3). However, ITS 3.4.6 Actions A, B, and C are not consistent with STS 3.4.6 Actions A and B since TSTF-263 Rev. 3 was not adopted. CL3.4-113 stated that TSTF-263 Rev. 3 was not included since PI is a two loop plant. CL3.4-113 does not justify why STS 3.4.6 Actions A and B were not adopted.

**Comment:** Adoption of STS 3.4.6 Actions A and B is conservative for a two loop plant and should be considered. Justify not adopting STS 3.4.6 Actions A and B for ITS.

12. ITS 3.4.6 Action B Note  
X3.4-124

X3.4-124 adds a note stating that “required action B.1 is not applicable if all RCS and RHR loops are inoperable and Condition C is entered.” This note is not in the CTS or the STS. Additionally, this added instruction would not be needed if the STS 3.4.6 Actions A and B were adopted (see RAI 11). Based on the wording of ITS 3.4.6 Action B, it is not clear why Action B Note is necessary.

**Comment:** Provide further justification for the addition of the plant specific Note to ITS 3.4.6 Action B.

13. ITS SR 3.4.6.2  
X3.4-121

STS SR 3.4.6.2 requires the verification of steam generator secondary side water levels to be  $\geq$  [17]% for required RCS loops. ITS SR 3.4.6.2 would require verification of steam generator secondary side water levels to be  $\geq$  60% (Wide Range) for each required RCS loops. ITS SR 3.4.6.2 is not consistent with the CTS (new SR) or STS.

**Comment:** ITS SR 3.4.6.2 is beyond scope.

14. ITS LCO 3.4.7.b  
X3.4-121

STS LCO 3.4.7.b requires that the steam generator secondary side water levels of two SGs be  $\geq$  [17]%. ITS LCO 3.4.7.b would require that the steam generator secondary side water level of one SG be  $\geq$  60% (Wide Range). ITS LCO 3.4.7.b is not consistent with the CTS or STS.

**Comment:** ITS LCO 3.4.7.b is beyond scope.

15. ITS 3.4.7 Note 1  
PA3.4-120

ITS 3.4.7 Note 1 states that the RHR pump of the loop in operation may be not in operation for  $\leq 1$  hour per 8 hour period. PA3.4-120 adds an additional comment to the note which states that the RHR pump of the loop in operation may be not in operation for  $\leq 1$  hour per 8 hour period to perform tests. This additional phrase is not in the CTS or the STS. However, the additional phrase is discussed in the ITS 3.4.7 Bases and therefore should not be added to the ITS 3.4.7 Note 1.

**Comment:** Retain the STS 3.4.7 Note 1 wording.

16. ITS 3.4.7 Actions A and B  
CL3.4-113  
TSTF-263 Rev. 3

ITS 3.4.7 Actions A, and B provide the required actions when one RHR is not operable and one RHR loop is not in operation in MODE 5, Loops Filled. ITS 3.4.6 Actions A and B are not consistent with STS 3.4.6 Actions A and B since TSTF-263 Rev. 3 was not adopted. CL3.4-113 stated that TSTF-263 Rev. 3 was not included since PI is a two loop plant. CL3.4-113 does not justify why STS 3.4.7 Actions A, B, and C were not adopted. Additionally, the required actions proposed in ITS 3.4.7 do not address the situation where one RHR is inoperable while the other RHR is operable, as specified in ITS 3.4.7.a. ITS actions should address all conditions of the LCO.

**Comment:** Correct the ITS actions by adopting TSTF-263 Rev. 3 and STS 3.4.7 Actions A, B, and C.

17. ITS 3.4.7 Action A

The AND statement of ITS 3.4.7 Condition A states that “both SGs secondary side water levels not within limits.” This is not consistent with ITS LCO 3.4.7.b which states that “the secondary side water level of at least one steam generator (SG) shall be  $\geq 60\%$  (Wide Range).”

**Comment:** Correct the ITS LCO 3.4.7.b or ITS 3.4.7 Action A such that they are consistent with one another.

18. ITS SR 3.4.7.2  
X3.4-121

STS SR 3.4.7.2 requires the verification of steam generator secondary side water levels to be  $\geq [17]\%$  in required SGs. ITS SR 3.4.7.2 would require verification of steam generator secondary side water levels to be  $\geq 60\%$  (Wide Range) in the required SGs. ITS SR 3.4.7.2 is not consistent with the CTS (new SR) or STS.

**Comment:** ITS SR 3.4.7.2 is beyond scope.

19. CTS 3.1.A.1.c(2)  
ITS 3.4.7 Action A

The AND statement of ITS 3.4.7 Condition A states that “both SGs secondary side water levels not within limits.” CTS 3.1.A.1.c(2) does not have this condition. The addition of this condition to the ITS was not discussed in the mark up of the CTS, i.e, this change was not included in the discussion of changes for CTS 3.1.A.1.c(2).

**Comment:** Correct the CTS mark up and provide the appropriate discussion of change for the AND statement of ITS 3.4.7 Condition A.

20. ITS 3.4.8 Note 1  
CL3.4-131  
M3.4-34

STS 3.4.8 Note 1 states that “all RHR pumps may be not in operation for  $\leq$  15 minutes when switching from one loop to another provided:...” CL3.4-131 proposed not to include the phrase ‘switching from one loop to another,’ since the Prairie Island CTS allows both RHR pumps to be inoperable up to 1 hour without restrictions on the nature of the required operability. M3.4-34 discusses the change to the CTS which would limit the time both RHR pumps can be inoperable (from 1 hour to 15 minutes). This more restrictive change should also include the STS language of ‘switching from one loop to another,’ since the CTS is being changed.

**Comment:** Adopt the STS wording for STS 3.4.8 Note 1 or provide further plant specific justification as to why the note is acceptable without the STS wording.

21. CTS 3.1.A.2.a(3)  
ITS 3.4.9 Action A  
M3.4-43

ITS 3.4.9 Action A requires if the pressurizer water level is not within limit, ‘be in MODE 3, fully insert all rods, and place rod control system in a condition incapable of rod withdrawal,’ within 6 hours. This is consistent with STS 3.4.9 Action A. The mark up of CTS 3.1.A.2.a(3) implies that the completion time is 6 hours to be in MODE 3, insert all rods within the next 6 hours, and place rod control system in a condition incapable of rod withdrawal within the next 6 hours. The CTS mark up is confusing and does not reflect the STS or ITS.

**Comment:** Correct the CTS markup to adequately reflect the ITS 3.4.9 Action A statements.

22. CTS 3.1.A.2.a(3)  
ITS SR 3.4.9.1  
M3.4-44

M3.4-44 discusses the changes to the CTS which includes the addition of ITS SR 3.4.9.1. M3.4-44 states that this SR will require periodic verification of a steam bubble in the SG. The CTS mark up states the new SR will verify steam bubble in the pressurizer. However, the actual wording of ITS SR 3.4.9.1 is verify pressurizer water level is  $\leq$  90%.

**Comment:** Correct the documentation to support the new SR, ITS SR 3.4.9.1.

23. CTS 3.1.A.2.b(1)  
A3.4-46  
ITS LCO 3.4.10  
ITS SR 3.4.10.1  
CTS Table TS 4.1-2A Item 3

CTS 3.1.A.2.b(1) requires that a reactor shall not be made or maintained critical nor shall reactor coolant system average temperature exceed 350°F unless two pressurizer safety valves are OPERABLE, with lift settings of 2485 psig,  $\pm 1\%$ . ITS LCO 3.4.10 states that two pressurizer safety valves shall be OPERABLE with lift settings  $\geq 2410$  psig and  $\leq 2560$  psig. These lift settings are 2485 psig  $\pm 3\%$ . The discussion of changes for this proposed change was A3.4-46 which states that License Amendment 123 approved the use of  $\pm 3\%$  for operability testing. The staff agrees that License Amendment 123 approved the use of  $\pm 3$  for operability testing for CTS Table TS 4.1-2A Item 3 but CTS 3.1.A.2.b(1) was not change with this amendment. Therefore, changing  $\pm 1\%$  to  $\pm 3\%$  in the CTS mark up and ITS LCO 3.4.10 is not an administrative change.

Additionally, the proposed ITS LCO 3.4.10 lift settings (at  $\pm 3\%$ ) are inconsistent with the lift settings in ITS SR 3.4.10.1 (at  $\pm 1\%$ ). The lift settings as stated in the LCO should be consistent with the lift settings stated in the SR. For PI, the lift settings for the LCO and the SR should be  $\pm 1\%$  unless the licensing basis is changed. This is not in conflict with the conclusions of license amendment 123 due to the following:

Although the pressurizer safety valves must be set to  $\pm 1\%$  during the surveillance, the pressurizer safety valves satisfy safety analysis assumptions and meet ASME Code requirements if the setpoint is determined to be  $\pm 3\%$  at the end of the surveillance interval. Therefore, the pressurizer safety valve setpoint is  $\pm 3\%$  for OPERABILITY; however, the valves must be reset to  $\pm 1\%$  during the surveillance to allow for drift.

**Comment:** Maintain the CTS requirements and correct ITS LCO 3.4.10 to show the lift settings at  $\pm 1\%$ .

24. ITS SR 3.4.10.1  
PA3.4-143

ITS SR 3.4.10.1 requires the verification that each pressurizer safety valve is OPERABLE in accordance with the Inservice Testing Program. Following testing, lift settings shall be within  $\pm 1\%$ . ITS SR 3.4.10.1 requires that following testing, lift settings shall be within 2460 to 2510 psig. PA3.4-143 stated that the proposed change was provided for clarity. This proposed change is plant specific and not consistent with the CTS or STS.

**Comment:** Maintain the CTS and STS wording  $\pm 1\%$ .

25. CTS 3.1.A.2.b(1)  
M3.4-45  
ITS 3.4.10 Action B

CTS 3.1.A.2.b(1) requires the reactor coolant system average temperature be below 350°F within the following 6 hours (12 hours total) if the conditions cannot be satisfied. ITS 3.4.10 Action B allows 24 hours for this mode change. M3.4-45 describes the change from 12 hours to 24 hours as a more restrictive change since the plant has to be cooled down further than the CTS. Changing the allowed completion time from 12 hours to 24 hours is a less restrictive change and should be documented as such.

**Comment:** Provide the proper discussion of changes for changing the completion time from 12 hours to 24 hours.

26. CTS 3.1.A.2.c.(1).(b).4  
ITS 3.4.11 Action C Note

ITS 3.4.11 Action C has a Note which states that Required Actions C.1 and C.2 do not apply when block valve is inoperable solely as a result of complying with Required Action B.2 or E.2. The CTS does not appear to have this note. No discussion of change was included on the CTS mark up to discuss the addition of this note.

**Comment:** Provide discussion of change for the addition of ITS 3.4.11 Action C Note.

27. CTS 3.1.A.2.c.(1).(b).5  
ITS 3.4.11 Action F Note

ITS 3.4.11 Action F has a Note which states that Required Action F.1 does not apply when block valve is inoperable solely as a result of complying with Required Action B.2 or E.2. The CTS does not appear to have this note. No discussion of change was included on the CTS mark up to discuss the addition of this note.

**Comment:** Provide discussion of change for the addition of ITS 3.4.11 Action F Note.

28. CTS 3.1.A.2.c.(1).(b).5  
A3.4-49  
ITS 3.4.11 Action F

CTS 3.1.A.2.c.(1).(b).5 requires that with both block valves inoperable, within one hour either restore the block valves to OPERABLE status or place the PORVs in manual control. Additionally, restore at least one block valve to OPERABLE status within the next hour. ITS 3.4.11 Action F requires the restoration of one block valve to OPERABLE status within 2 hours. A3.4-49 does not discuss the deletion of the action to place the PORVs in manual control if both block valves are inoperable.

**Comment:** Provide further justification for deleting the CTS requirement to place the PORVs in manual control if both block valves are inoperable.

29. CTS Table TS 4.1-2A  
ITS SR 3.4.11.1 Note 2

ITS SR 3.4.11.1 has a Note 2 which states that SR 3.4.11.1 is only required to be performed in MODES 1 and 2. The CTS does not appear to have this note. No discussion of change was included on the CTS mark up to discuss the addition of this note.

**Comment:** Provide discussion of change for the addition of ITS SR 3.4.11.1 Note 2.

30. CTS Table TS 4.1-2A  
ITS SR 3.4.11.2 Note

ITS SR 3.4.11.2 has a Note which states that SR 3.4.11.2 is only required to be performed in MODES 1 and 2. The CTS does not appear to have this note. No discussion of change was included on the CTS mark up to discuss the addition of this note.

**Comment:** Provide discussion of change for the addition of ITS SR 3.4.11.2 Note.

31. ITS 3.4.12 Title and LCO  
ITS 3.4.13 Title and LCO  
CTS 3.1.A.2.c.(2)  
TA3.4-119

TA3.4-119 incorporates TSTF-233 but modifies the inserted phrase from LTOP to Over Pressure Protection System (OPPS) which is the PI specific terminology. CTS 3.1.A.2.c.(2) uses the OPPS terminology. The following ITS specifications used the OPPS terminology instead of LTOP: ITS 3.4.6 Note 2, ITS 3.4.7 Note 3, ITS 3.4.10 Applicability, ITS 3.4.10 Required Action B.2 and ITS 3.4.12 Applicability. However, the title and LCO for ITS 3.4.12 and ITS 3.4.13 uses the phrase LTOP. This inconsistency is unacceptable.

**Comment:** Correct the ITS sections to use either the OPPS or LTOP terminology. If the LTOP terminology is used, justification is required since the CTS uses the OPPS terminology.

32. ITS 3.4.12 entire spec  
ITS 3.4.13 entire spec  
CTS 3.1.A.2.c.(2)  
CTS 3.1.A.2.c.(3)

ITS 3.4.12 and ITS 3.4.13 provide the requirements for LTOP > SI pump disable temperature and LTOP ≤ SI pump disable temperature. STS 3.4.12 has the LTOP requirements in one LCO which requires that an LTOP System be OPERABLE with a maximum of [one] [high pressure injection (HPI)] pump [and one charging pump] capable of injecting into the RCS and the accumulators isolated and one pressure relief capabilities. The proposed ITS 3.4.12 and ITS 3.4.13 are not acceptable and do not appear to be consistent with the CTS.

**Comment:** Review the ITS 3.4.12 for Ginna and work with the staff to produce one acceptable LTOP (or OPPS - once a single terminology is selected) LCO which incorporates the CTS.

33. CTS Table 4.1-2A Item 9  
ITS SR 3.4.14.1  
L3.4-89

ITS SR 3.4.14.1 requires the verification of RCS operational leakage is within limits by performance of RCS water inventory balance every 72 hours. CTS Table 4.1-2A Item 9 requires the verification every day. L3.4-89 states that this increase surveillance interval is considered acceptable based on the leakage detection systems required to be operable by LCO 3.4.16. However, ITS 3.4.14 Action statements retain the CTS required actions. The current required actions are less restrictive than the required actions in STS 3.4.13 (different numbering same topic). Based on retaining the current required actions, the current frequency of the CTS should also be retained.

**Comment:** Revise ITS SR 3.4.14.1 frequency such that it is consistent with the CTS Table 4.1-2A Item 9.

34. CTS Table 4.1-2A  
ITS SR 3.4.14.1 NOTE

ITS SR 3.4.14.1 has a Note which states that SR 3.4.14.1 is not required to be performed until 12 after establishment of steady state operation. The CTS does not appear to have this note. No discussion of change was included on the CTS mark up to discuss the addition of this note.

**Comment:** Provide discussion of change for the addition of ITS SR 3.4.14.1 Note.

35. ITS 3.4.17 LCO  
ITS 3.4.17 Action A  
PA3.4-197

STS LCO 3.4.16 states that the specific activity of the reactor coolant shall be within limits. ITS LCO 3.4.17 proposes to add the specific limits to the LCO in 3.4.17.a and 3.4.17.b. PA3.4-197 states that the LCO and Condition A wording is revised to be consistent with each other and with Condition B. ITS 3.4.17 Action A is revised to state "Dose Equivalent I-131 specific activity not within limit." These changes are not consistent with STS 3.4.16 and are generic in nature. Additionally, ITS SR 3.4.17.1 and ITS SR 3.4.17.2 specify the required limits and therefore, the limits should not be specified in the LCO.

**Comment:** Retain the STS wording for 3.4.16 LCO and Action A.

36. ITS 3.4.17 Action C  
PA3.4-202

The second condition of ITS 3.4.17 Action C is modified to include the phrase "specific activity." PA3.4-202 states that Condition C is revised to clarify the terminology. This proposed change is generic in nature and not justified as a plant specific change.

**Comment:** Retain the STS wording for ITS 3.4.17 Action C or provide plant specific justification for the proposed change.

37. ITS SR 3.4.17.3  
PA3.4-203

ITS SR 3.4.17.3 is modified to state "Determine E from a reactor coolant sample. PA3.4-203 states that SR 3.4.17.3 has been modified to eliminate redundancy and clarify intent. This proposed change is generic in nature and not justified as a plant specific change.

**Comment:** Retain the STS wording for ITS SR 3.4.17.3 or provide a plant specific justification for the proposed change.

38. CTS Table TS.4.1-2B Item 1  
ITS SR 3.4.17.1  
L3.4-88

CTS Table TS.4.1-2B Item 1 requires the RCS Gross Activity determination to be performed 5/week. ITS SR 3.4.17.1 would require the RCS Gross Activity determination to be performed every 7 days. L3.4-88 states that the surveillance interval for RCS gross activity determination would be increased to once per week by this change in conformance with the guidance of NUREG-1431. L3.4-88 incorrectly states that the frequency is being increased versus the actual proposed decrease in frequency of the surveillance.

**Comment:** Correct L3.4-88 to be representative of the proposed change.

39. CTS Table TS.4.1-2B Item 2  
ITS SR 3.4.17.2 Note

ITS SR 3.4.17.2 has a Note which states that SR 3.4.17.2 is only required to be performed in MODE 1. The CTS does not appear to have this note. No discussion of change was included on the CTS mark up to discuss the addition of this note.

**Comment:** Provide discussion of change for the addition of ITS SR 3.4.17.2 Note.

40. CTS Table TS.4.1-2B Note 1  
ITS SR 3.4.17.3 Note

ITS SR 3.4.17.3 has a Note which states that SR 3.4.17.3 is not required to be performed until 31 days after a minimum of 2 effective full power days and 20 days of MODE 1 operation have elapsed since the reactor was last subcritical for  $\geq 48$  hours. CTS Table TS.4.1-2B Note 1 states that samples to be taken after a minimum of 2 EFPD and 20 days of Power Operation have elapsed since reactor was last subcritical for 48 hours or longer. ITS Sr 3.4.17.3 Note and CTS Table TS.4.1-2B Note are not the same. No discussion of change was included on the CTS mark up to discuss the differences between the two notes.

**Comment:** Provide discussion of change for the addition of ITS SR 3.4.17.3 Note.

41. CTS 3.1.A.1.b(2)  
A3.4-08

CTS 3.1.A.1.b(2) is modified to state be in MODE 4 versus reduce reactor coolant system average temperature below 350°F. This change is described as A3.4-08. CTS 3.1.A.1.b(2) does not appear on the list for A3.4-08 as one of the specifications altered by this change.

**Comment:** Add CTS 3.1.A.1.b(2) to the list for A3.4-08.

42. CTS 3.1.A.3  
TS 4.18  
R3.4-56

CTS 3.1.A.3 is proposed to be relocated to the TRM. R3.4-56 states that this relocation is acceptable since CTS 3.1.A.3 and the associated surveillance requirements in TS 4.18 do not meet the criteria of 10 CFR 50.36. However, each criteria of 10 CFR 50.36 was not addressed in order to demonstrate that this system does not meet the 10 CFR 50.36 criteria.

**Comment:** Provide further documentation which addresses each criteria of 10 CFR 50.36 to demonstrate that this system is not required to be in TS.

43. CTS 3.1.B.2  
R3.4-66

CTS 3.1.B.2 is proposed to be relocated to the PTLR. R3.4-66 states that this change is acceptable since the Bases for Specification 3.4.3 (STS Bases?) state that the reactor pressure vessel is the most limiting component for brittle fracture; thus the requirements for the pressurizer have not been included in the ITS. This is not adequate justification for relocating technical specifications.

**Comment:** Provide further documentation which addresses each criteria of 10 CFR 50.36 to demonstrate that the pressurizer heatup and cooldown specifications are not required to be in TS.

44. CTS 3.1.B.3  
R3.4-67

CTS 3.1.B.3 is proposed to be relocated to the PTLR. R3.4-67 states that this relocation is acceptable since CTS 3.1.B.3 and the associated surveillance requirements do not meet the criteria of 10 CFR 50.36. However, each criteria of 10 CFR 50.36 was not addressed in order to demonstrate that this system does not meet the 10 CFR 50.36 criteria.

**Comment:** Provide further documentation which addresses each criteria of 10 CFR 50.36 to demonstrate that this system is not required to be in TS.