

From: Peter Tam
To: INternet:dosaj@nimo.com; internet:steven.leonard@nmp.cn.com;
internet:wolniakd@nimo.com
Date: 8/7/02 3:40PM
Subject: Issues re. NMP1 proposed amendment on Section 6.0 (TAC MB2441)

Steve, John:

Attached please find the issues raised by our reviewer Bob Giardina. Please call me to set up a conference call. **This email and attachment are provided to you solely for the purpose of preparing for the conference call; they do not formally request for additional information, and do not convey a formal NRC staff position.**

Peter S. Tam, Senior Project Manager
Project Directorate I-1
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

e-mail: pst@nrc.gov Tel.: 301-415-1451

Mail Envelope Properties

(3D5177B2.4E3 : 10 : 20510)

Subject: Issues re. NMP1 proposed amendment on Section 6.0 (TAC MB2441)
Creation Date: 8/7/02 3:40PM
From: Peter Tam
Created By: PST@nrc.gov

Recipients	Action	Date & Time
nimo.com dosaj (INternet:dosaj@nimo.com) wolniakd (internet:wolniakd@nimo.com)	Transferred	08/07/02 03:40PM
steven leonard (internet:steven.leonard@nmp.cn.c	Transferred	08/07/02 03:40PM
Post Office nimo.com steven	Delivered	Route INternet internet:nmp.cn.com

Files	Size	Date & Time
message2.wpd	16460	08/07/02 03:30PM
MESSAGE	1401	08/07/02 03:40PM

Options
Auto Delete: No
Expiration Date: None
Notify Recipients: Yes

Priority:	Standard
Reply Requested:	No
Return Notification:	None
Concealed Subject:	No
Security:	Standard
To Be Delivered:	Immediate
Status Tracking:	Delivered & Opened

Request for Additional Information
Nine Mile Point Unit 1

6.0-1 See Table 1 pg

In the NMP-1 Section 6.0 Current Technical Specifications (CTS) cited in Table 1, the wording is either exactly the same as or similar to the corresponding NMP-1 Section 6.0 proposed Technical Specifications (PTS) cited in Table 1. In converting the CTS to the PTS some of these specifications were modified from the Standard Technical Specifications (STS) and the NMP-2 Improved Technical Specifications (ITS) and some justifications (DOC's and JFD's) were provided to justify deviations from the standard and consistency with NMP-2 ITS. Yet for the PTS 6.0 specifications (cited in Table 1), the wording is different from the corresponding NMP-2 ITS 5.0 specification. No justification is provided to describe or justify these differences/inconsistencies. If the intent of the amendment is to make the Unit 1 TS consistent with the Unit 2 ITS, then the wording for similar specifications in PTS 6.0 should be the same as the corresponding ITS 5.0 specification. The same would be true for those specifications that were not adopted where NMP-2 has specifications and/or programs either currently in the CTS or in licensee controlled documents. If there is to be consistency between the units, then the specifications should be consistent. See Comment Number 6.0-2.

COMMENT: Either make the PTS consistent with the ITS or provide a discussion and justification for the deviation/inconsistency. See Comment Numbers 6.0-2.

NMP-1 Response:

6.0-2 JFD 15
 NMP-2 5.5.9
 STS 5.5.10

JFD 15 states that the requirements for the diesel fuel oil testing program (STS 5.5.10/NMP-2 ITS 5.5.4) are not part of the NMP-1 current licensing basis and thus the requirement/program is not being added. However, there are plant procedures which specify the testing requirements for both new and stored diesel fuel oil at the plant. The justification does not provide sufficient information to determine

the interrelationship between the NMP-1 and NMP-2 diesel fuel oil storage and transfer systems. If the systems are the same system, are shared in any manner or interconnected, then the NMP-1 PTS should contain a program on diesel fuel oil testing in PTS 6.5 to be consistent with NMP-2 ITS and the fuel testing program. If the systems are totally independent with no interconnections, then the staff could find that the fuel oil testing program does not need to be in the NMP-1 TS. Comment: Provide a description of the diesel fuel oil storage and transfer system at NMP-1 and NMP-2 and revise and justify any changes to PTS 6.5 based on the extent of sharing of the NMP-1 and NMP-2 diesel fuel oil storage and transfer system.

NMP-1 Response:

6.0-3

DOC A.2
JFD 4
CTS 6.9.1.f.2
PTS 6.6.5.b

CTS 6.9.1.f.2 specifies the analytical methods used to determine the core operating limits that have been reviewed and approved by the staff for use in developing the Core Operating Limits Report for NMP-1. These methods are specifically described in the following topical reports specified in CTS 6.4.1.F.2: 1) NEDE-24011-P-A, (latest approved revision), 2) NEDF-30966-P-A (latest approved revision), Volumes I and II, 3) NEDO-20556-P-A, (latest approved revision) and 4) NEDO-32465-A (August 1996, revision). The corresponding PTS 6.6 specification is PTS 6.6.5.b. PTS 6.6.5.b only lists NEDE-24011-P-A (latest approved revision), and not the other three topical reports. The justification for deleting the other 3 specified topical reports (DOC A.2) states that "NEDE-24011-P-A now contains all the methods reviewed and approved by the NRC for the NMP1 Loss of Coolant Accident Analysis and for the Stability Analysis. Therefore, the references to the other three report (NEDE-30966-P-A, NEDO-20556-P-A, and NEDO-32465-A) are redundant." While this may be true at this point in time, any one of these documents could be revised and the other associated documents not be revised. The approval of the TS changes associated with the use of the COLR was based on all four documents, not just the one. Which may or may not have the current analytical methods contained in all the topicals. Comment: Revise PTS 6.6.5.b to conform to CTS 6.4.1.f.2.

NMP-1 Response:

Table 1
Cross Reference of Inconsistent Specifications
Between Unit 1 and Unit 2

NMP-1 CTS Section	NMP-1 PTS Section	Corresponding NMP-2 ITS Section	Associated NMP-1 DOCs	Associated NMP-1 JFDs
6.1.2	6.1.2	5.1.2	M.1	3
6.2.1 Title	6.2.1 Title	5.2.1 Title	—	9
6.2.1.a	6.2.1.a	5.2.1.a	—	2,3
6.2.1.b	6.2.1.b	5.2.1.c	—	9
6.2.1.c	6.2.1.c	5.2.1.b	—	9
6.2.2	6.2.2	5.2.2	—	9
6.2.2.a; Table 6.2-1	6.2.2.a	5.2.2.a	A.4	4
6.2.2.b; 6.2.2.e; Table 6.2-1	—	5.2.2.b	LA.2	TSTF-258
Table 6.2-1 Note 6	6.2.2.b	5.2.2.c	A.5	1, 3, 5, 9
6.2.2.h	6.2.2.d	5.2.2.e	LA.6, L.1	2, 3, 6, 8, 9, TSTF-258
6.2.2.i	6.2.2.e	5.2.2.f	—	2, 9
6.3.1	6.3.1	5.3.1	LA. 1	3
6.8.1	6.4.1	5.4.1	—	3, 5
—	6.4.1.a	5.4.1.a	A.2	6
—	6.5	5.5	A.1	
—				
—	—	5.5.3	—	7
—	—	5.5.5	—	10
6.17	6.17	5.5.6	—	12
—	—	5.5.7	—	13
—	—	5.5.9	—	15
—	6.5.3.b.2	5.5.10.b.2	A.2, M.1	9, TSTF-364
6.9.1.e	6.6.4	5.6.4	L.1	TSTF-258
6.9.1.F.3	6.6.5.c	5.6.5.c	—	7
—	—	5.6.6	—	11