

October 22, 2002

Mr. Michael R. Kansler  
Senior Vice President and  
Chief Operating Officer  
Entergy Nuclear Operations, Inc.  
440 Hamilton Avenue  
White Plains, NY 10601

SUBJECT: INDIAN POINT NUCLEAR GENERATING UNIT NO. 2 - COMMENTS AND  
REQUEST FOR ADDITIONAL INFORMATION (RAI) REGARDING IMPROVED  
TECHNICAL SPECIFICATION (ITS) SECTIONS 1.0, 2.0, 3.0, 3.1, 3.2, 3.3, 3.4,  
3.5, 3.6, 3.7, 3.9, 4.0, AND 5.0 (TAC NO. MB4739)

Dear Mr. Kansler:

The Nuclear Regulatory Commission staff is reviewing your application for a license amendment dated March 27, 2002, to change the format and content of the current Technical Specifications (TSs) for the Indian Point Nuclear Generating Unit No. 2 to be generally consistent with NUREG-1431, "Standard Technical Specifications Westinghouse Plants Technical Specifications," Revision 2, dated April 2001.

On the basis of our review of the changes proposed for improved TS Sections 1.0, 2.0, 3.0, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.8, 3.9, 4.0, and 5.0, we find that additional information identified in the enclosure is needed.

We have discussed this with your staff and it was agreeable to your staff to respond to this RAI and provide comments within 60 days from receipt of this letter.

If you have questions regarding this letter or are unable to meet this response schedule, please contact me by phone on (301) 415-1441 or by electronic mail at [gsv@nrc.gov](mailto:gsv@nrc.gov).

Sincerely,

*/RA/*

Guy S. Vissing, Senior Project Manager, Section 1  
Project Directorate 1  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-247

Enclosure: As stated

cc w/encl: See next page

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## Indian Point 2 Improved Technical Specification (ITS) Review

### Comments & Requests for Additional Information (RAIs) (TAC No. MB4739)

**Section 1.0 - Use/Application:** No comments

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#### **Section 2.0 - Safety Limits (SL)**

##### **RAI 2.0-1**

ITS 2.0 SAFETY LIMITS

Standard Technical Specification (STS) 2.1.1.2 Peak Centerline Temperature (PCT) SL

Current Technical Specification (CTS) 2.1.1

Description of Changes (DOCs) LA.1 and M.1

Justification for Difference (JFD) DB.1

The STS SL 2.1.1.2 on PCT is not included in the ITS.

**Comment:** Why is the SL on PCT not included?

**ENTERGY Response:**

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##### **RAI 2.0-2**

ITS 2.0 SAFETY LIMITS BASES

ITS B2.1.2

STS B2.1.2

APPLICABLE SAFETY ANALYSES

In the first sentence of the third paragraph of the ITS B2.1.2 APPLICABLE SAFETY ANALYSES, the word "setpoints" have been replaced by "allowable values," without justification.

**Comment:** Provide justification for the change. "Setpoints" are the trip settings that provide the protection, while the "allowable values" are the actual limits, and therefore the STS wording is correct.

**ENTERGY Response:**

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**Section 3.0 - LCOs/Surveillance Requirements (SRs) Application:** No Comments

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**Section 3.1 - Reactivity Control Systems**

**RAI 3.1.4-1**

ITS 3.1.4 ROD GROUP ALIGNMENT LIMITS  
STS 3.1.4 ROD GROUP ALIGNMENT LIMITS  
ITS LCO 3.1.4.b and various ITS BASES Insert Changes  
DOC L.4  
JFDs X.1, DB.1, and DB.2

ITS LCO 3.1.4.b and various ITS BASES Insert Changes that include information that is only relevant to Cycle 15. DOC L.4 states, "Therefore, prior to startup of each fuel cycle, these calculations need to be repeated to ensure that core peaking factors will not be exceeded when there is an indicated misalignment of plus or minus 24 steps between individual rod positions and the group step counter demand position when operating less than or equal to 50% RTP [rated thermal power]."

**Comment:** "These calculations," are they not performed in accordance with an (NRC-approved) methodology? This appears to be information that should be placed in the Core Operating Limits Report (COLR); otherwise, ENTERGY will be submitting a license amendment request (LAR) for approval before the beginning of every cycle. This is unusual for an STS plant. Can a bounding limit be used?

**ENTERGY Response:**

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**RAI 3.1.4-2**

ITS 3.1.4 ROD GROUP ALIGNMENT LIMITS  
STS 3.1.4 ROD GROUP ALIGNMENT LIMITS  
ITS APPLICABILITY Note  
DOC L.5  
JFD X.1

The ITS adds a note to the APPLICABILITY statement that states, "Indicated rod position is not required to meet group alignment limits until 1 hour after completion of control rod movement."

**Comment:** The note is related to rod position indication, and not the applicability of the LCO, which is on rod alignment as the title indicates. Therefore, the note should appear before SR 3.1.4.1, on verifying rod position, as it does in the IP3 TS. JFD X.1 indicates that the note is added to SR 3.1.4.1; though in fact, it is not.

**ENTERGY Response:**

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**RAI 3.1.4-3**

ITS 3.1.4 ROD GROUP ALIGNMENT LIMITS  
STS 3.1.4 ROD GROUP ALIGNMENT LIMITS  
ITS SR 3.1.4.3  
JFD CLB.2

The wording for ITS SR 3.1.4.3, to verify the rod drop time of each rod, is changed from the STS version of, "... from the beginning of decay of stationary gripper coil voltage to dashpot entry, ..." to read, "... from the gripper release to dashpot entry, ...". The IP3 SR reads, "...from the loss of stationary gripper coil voltage to dashpot entry, ...".

**Comment:** Why is the IP2 SR different?

**ENTERGY Response:**

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**RAI 3.1.4-4**

ITS 3.1.4 ROD GROUP ALIGNMENT LIMITS

LCO, Control Rod Misalignment Limits

Adoption of IP2 LAR No. 02-010

IP2 LAR No. 02-010, to change CTS requirements for control rod misalignment and rod position indication, is not incorporated into the ITS conversion request.

**Comment:** Upon approval of IP2 LAR No. 02-010, update the ITS submittal.

**ENTERGY Response:**

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**RAI 3.1.7-1**

ITS 3.1.7 ROD POSITION INDICATION

STS 3.1.7 ROD POSITION INDICATION

REQUIRED ACTIONS A and B, COMPLETION TIMES

DOC A.6

JFD CLB.1

The IP2 proposed COMPLETION TIMES for REQUIRED ACTIONS A and B are changed from the 8 hours in the STS to 12 hours, based upon the CTS frequency of once per shift being defined as "at least twice per calendar day." The IP3 COMPLETION TIMES are 8 hours, consistent with the STS.

**Comment:** Are IP2 shifts 8 or 12 hours? Are not IP2 and IP3 shifts the same length? Why were not the COMPLETION TIMES for REQUIRED ACTIONS D also proposed to be 12 hours; should they not be consistent?

**ENTERGY Response:**

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**Section 3.2 - Power Distribution Limits:**

**RAI 3.2.4-1**

ITS 3.2.4 QUADRANT POWER TILT RATIO (QPTR)

STS 3.2.4 QUADRANT POWER TILT RATIO (QPTR)

SR 3.2.4.2

JFD CLB.

The proposed frequency for IP2 ITS SR 3.2.4.2 is 24 hours, versus 12 hours in the STS, based upon CTS.

**Comment:** The CLB justification is not provided. The CTS 24-hour requirement is not readily apparent; where is the CTS requirement?

**ENTERGY Response:**

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### **Section 3.3 - Instrumentation**

#### **Sect 3.3.1 - RPS Instrumentation**

##### **General Comments:**

1. Provide draft ITS Safety Evaluation (SE) discussion of change tables to show the format and content of A-DOC, M-DOC, L-DOC, LA-DOC, and R-DOC tables.
2. Provide justification for deviation for proposed Bases changes.

##### **RAI 3.3.1.01 (Item 1 also see item 14)**

CTS 3.5.3 and 3.5.4

ITS per DOC M.01

Change M.01 states CTS 3.5.3 and 3.5.4 bypass allowance “for a short period of time” means “12 hours” (as allowed by WCAP-14333) for some RPS functions and “4 hours” (as allowed by WCAP-10271) for other RPS functions. Provide plant procedures for staff review which direct operators to use these bypass allowance interpretations.

**ENTERGY Response:**

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##### **RAI 3.3.1.02 (Item 2) - BSI for staff review**

CTS 2.3.1

ITS per DOC L.1

Staff review of new setpoint methodology required.

**ENTERGY Response:**

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##### **RAI 3.3.1.03 (Item 3)**

CTS Table 3.5.2

ITS - none

DOCs A.3.c, A.3.d, A.4.d, A.5.d, A.6.c, A.7.c, A.9.d, A.10.d, A.11.d, A.12.d, A.13.d, A.14.d, A.15.d, A.15.d, A.16.d, A.17.d, A.18.d, A.20.d, A.27.c, A.27.d, and A.29.d

Provide a new M-DOC to justify the change to ITS Condition “Be in Mode 3 in 6 hours” from CTS Table 3.5-2, be in Shutdown per LCO 3.0.1 in 7 hours.

**ENTERGY Response:**

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**RAI 3.3.1.04 (Item 4)** - BSI for staff review

CTS 2.3.1.B(4), Overtemperature Delta Temperature

ITS per DOCs A.8.f and LA.4

Staff review of changes to STS equations. Application of “\*” note to COLR variables in TS equation is inconsistent with CTS and NUREG-1431.

**ENTERGY Response:**

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**RAI 3.3.1.05 (Item 5)** - BSI for staff review

CTS 2.3.1.B(5), Overpressure Delta Temperature

ITS per DOCs A.9.f and LA.4

Staff review of changes to STS equations. Application of “\*” note to COLR variables in TS equation is inconsistent with CTS and NUREG-1431.

**ENTERGY Response:**

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**RAI 3.3.1.06 (Item 6)** - BSI for staff review

CTS 2.3.2.A(1) and 2.3.2.(A)2, P-7 Interlocks

Correct CTS inequality markup errors replacing “≤” with “<” for “P-10, < 10% RTP” and “< 10% turbine power”

**ENTERGY Response:**

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**RAI 3.3.1.07 (Item 7)**

CTS 2.3.2.A(2), P-7 (Interlock Turbine 1<sup>st</sup> Stage Pressure)

Provide DOC justification changes to “10% turbine power” from “10% equivalent full load”

**ENTERGY Response:**

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**RAI 3.3.1.08 (Item 8)**

CTS 2.3.2.C

ITS Table 3.3.1-1, #15, 17.c, and 15(h)

Provide additional justification for translating the CTS reference above to the ITS functions.

Also discuss assigning ITS P-8 to 60% RTP per CTS 2.3.2.B and 35% RTP per CTS 2.3.2.C.

**ENTERGY Response:**

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**RAI 3.3.1.09 (Item 9)**

CTS 3.5.2, DOC A.30

The discussion of equivalent requirements in ITS and CTS 3.5.2 (page 3.5-1) is inaccurate. Revise an L-DOC

**ENTERGY Response:**

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**RAI 3.3.1.10 (Item 10)**

CTS 3.5.2, DOC L.2

The staff disagrees that deleting the text identified as "L.2" is related to LCO 3.0.5 (an exception to LCO 3.0.2), instead this change is related to the definition of OPERABILITY and should be evaluated as such.

**ENTERGY Response:**

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**RAI 3.3.1.11 (Item 11)**

CTS Table 3.5-2, No. 2, DOC A.4.c

ITS 3.3.1, Action D, JFD X.1

This proposed NUREG deviation replaces Actions D.1.2, D.2.1, and D.2.2 with new ITS Note 2. The proposed Note reference to QPTR SR 3.2.4.2 does not result in a requirement to perform the surveillance and the staff notes that the proposed ITS adopts the NUREG QPTR LCO. Revise the ITS to adopt the NUREG Actions D.1.2, D.2.1, and D.2.2.

**ENTERGY Response:**

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**RAI 3.3.1.12 (Item 12)**

CTS Table 3.5-2, DOC A.14, DOC A.15

ITS Table 3.3.1-1, F#10.a, #10.b, Action I (Reactor Coolant Pump (RCP) Breaker Position)

Retain the NUREG Note for RCP Breaker Position Action. CLB.2 states the changes made to the Note are approved by WCAP-14333. WCAP-14333 does not address Function 10.a changes to ITS Action I Note. Also, DOC A.14 and DOC A.15 add RCP Breaker Position TS requirements, thus an M-DOC justification is needed. Also, ITS Action J with NUREG-1433 changes applies to Function 10.b. In addition, IP2 needs to request staff review in order to apply the provisions of WCAP-14333 to Function 10.b because Function 10.b is not in the current IP2 licensing basis as provided by Amendment No. 212. Ensure an appropriate safety basis justification is submitted for each column entry of ITS Table 3.3.1-1 for Function 10.b.

**ENTERGY Response:**

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**RAI 3.3.1.13 (Item 13)**

CTS 3.5.3, page 3.5-1

ITS 3.3.1 A.1, DOC L.3

Clarify the intent of L.3 for describing changes to CTS 3.5.3.

**ENTERGY Response:**

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(Items 14 & 15)

Comments withdrawn

**RAI 3.3.1.14 (Item 16)**

DOC A.32. Explain which CTS allowances are being reformatted.

**ENTERGY Response:**

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**RAI 3.3.1.15 (Item 17)**

CTS T3.5-2, No. 1

ITS T3.3.1-1, F.1

Add reference to Mode 1, 2, 3(a), 4(a), 5(a) in DOC M.2. Add B.2 justification to DOC M.2. The analysis appears to not be met.

**ENTERGY Response:**

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(Item 18)

Comment withdrawn

**RAI 3.3.1.16 (Item 19)**

CTS T3.5-2 Note # to No. 18 (Reactor Trip Logic, Columns 3 & 4, ITS Action K.1

CTS T3.5-2 Note # to No. 19 (Reactor Trip Breaker, Col. 5) ITS Action L, DOC A.27.c

The CTS Action K and L bypass times (8 hours and 24 hours) are in T3.5-2. Current licensing basis includes WCAP-10271 and WCAP-14333 bypass allowed outage time (AOT) of 4 hours and 12 hours. Revise ITS to adopt NUREG Rev. 2 bypass time allowances in Action K Note (4 hours), and the bypass time allowances in Action L Notes 1 (2 hours), 2 (2 hours) and 3 (4 hours). [It appears Amendment Nos. 154 and 212 made TS changes in error of the analysis used to approve the bypass time allowances. In this regard, provide the license amendment citations to show the basis for T3.5-2, Note # in CTS.]

**ENTERGY Response:**

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Items 20, 21 & 22

Comment(s) withdrawn

**RAI 3.3.1.17 (Item 23) - BSI for staff review**

DOC A.6

ITS T3.3.1-1, F.3(IRNM) and 4 (SRNM)

ITS proposes "NA" Allowable Values and the ITS proposed Channel Calibration testing for both SRNMs and IRNMs. Calibrations require trip setpoints which are related to an analytical limit through the setpoint methodology.

**ENTERGY Response:**

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**RAI 3.3.1.18 (Item 24)**

Note to ITS SR 3.3.1.3 and 3.3.1.6

CTS 3.11.B

CTS 3.11.B specifies a penalty for not successfully completing recalibration requirements for the encore axial offset detection system. ITS STS 3.3.1.3 and 3.3.1.6 require testing every 31 EFPD. ITS proposed to delete SR notes which permit a delay for meeting STS upon entry into Modes 1 and 2. ITS proposes to replace the notes with a note to limit applicability of these STS to  $\geq 90\%$  RTP. To properly implement CTS revise ITS to adopt the NUREG SR notes (add plant-specific values to [ ]) and modify the ITS Action for OTdT (Condition E) to include reducing power to  $< 90\%$  RTP to requirements for placing inoperable channels in trip within 72 hours.

**ENTERGY Response:**

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**RAI 3.3.1.19 (Item 25)**

ITS SR 3.3.1.12 proposed change to NUREG note.

DOC M.7

DOC A.7.e, DOC A.8.e

Provide a design-basis justification for not adopting the NUREG note to SR 3.3.1.12 for both OPdT and OtdT.

**ENTERGY Response:**

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(Item 26)

Comment withdrawn

**RAI 3.3.1.20 (Item 27)**

DOC M.6 (SRNM/IRNM) SRs 3.3.1.7 and 3.3.1.8

Add a DOC discussion re: meeting IP2 analysis basis. Account for all CTS changes such as the 4-hour Note AOT, and the 92 day STI.

**ENTERGY Response:**

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**RAI 3.3.1.21 (Item 28)**

CTS 4.1.c Table 4.1-1 No. 3

CTS states tests will be performed promptly upon achieving minimum conditions (i.e., plant). Add DOC discussion justifying replacing CTS time allowance “promptly” with proposed ITS SR 3.3.1.7 and SR 3.3.1.8 testing time delays given in the NUREG. Cite plant procedures and operator guidance as evidence where available.

**ENTERGY Response:**

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Items 29, 30 & 31

Comment(s) withdrawn

**RAI 3.3.1.22** (tem 32)

ITS T3.3.1-1, F.18 RTPs, 19 (RTP under voltage and shunt trip mechanisms) & 20 (RTP Automatic Trip Logic)

CTS T3.5-2, No. 18 and No. 19 (Column 5)

Revise DOC M.11. Give a safety basis justification for the implied ITS functions Applicability and the addition of STS, and Actions specified in Table 3.3.1-1.

**ENTERGY Response:**

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**RAI 3.3.1.23** (Item 33)

ITS T3.3.1-1 F. 17 a-e (Interlocks)

Revise DOC M.10. Give a safety basis justification for the implied ITS functions Applicability and the addition of SRs, and Actions specified in Table 3.3.1-1.

**ENTERGY Response:**

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**RAI 3.3.1.24** (Item 34)

DOC M.3

CTS Table 3.5-2, No. 1 (Manual)

ITS T3.3.1-1, F.1 (Manual)

CTS do not specify a shutdown Applicability for manual reactor trip. Revise DOC M.3 to discuss the safety basis for the proposed CTS change to Applicability.

**ENTERGY Response:**

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**RAI 3.3.1.25** (Item 35)

DOC M.2

DOC A.3.c

Provide justification for adding Required Action B.2 and Required Action C.2.1/C.2.2.

**ENTERGY Response:**

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**RAI 3.3.1.26** (Item 36)

LA.3

DOC A.3.e and DOC A.4.e moves [manual trip] SR remarks to the Bases. Revise DOC LA.3 to justify the moved CTS "remarks" are descriptive information and the ITS TADOT contain all CTS test requirements. Identify plant procedures that implement T4.1-1, No. 42 R# and "remarks". DOC LA.3 does not evaluate all CTS T4.1-1 "remarks" for No. 42 (see T4.1-1 yellow highlights).

**ENTERGY Response:**

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**RAI 3.3.1.27** (Item 37)

DOC M.1

ITS uses WCAP-14333 test times and Completion Times. WCAP-14333 was approved for IP2 in Amendment No. 212. Explain the need for M.1 discussion of change.

**ENTERGY Response:**

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Item 38

Comment withdrawn

**RAI 3.3.1.28 (Item 39)**

DOC A.4.e

Provide plant procedures, or a design basis or analysis for the 24-hour time allowance. The NUREG uses 12 hours.

**ENTERGY Response:**

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Items 40, 41, 42, 43, 44, 45, 46, 47

Comment(s) withdrawn

**RAI 3.3.1.29 (Item 48)**

DOC L.4

This DOC does not discuss Required Action F.1 and F.2 as shown in CTS T3.5-2 markup (Column 5) for the IRNM.

**ENTERGY Response:**

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**RAI 3.3.1.30 (Item 49)**

DOC A.7.b, DOC A.7.c

Provide safety basis justification for SRNM Applicability in Modes 3(a), 4(a), and 5(a).

**ENTERGY Response:**

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**RAI 3.3.1.31 (Item 50)**

CTS T4.1-1, No. 2 (IRNM)

DOC L.05

Show the basis for the CTS SR changes in T4.1-1 for No. 2. SR test S/U(2)\*2 is translated into ITS SR 3.3.1.8 requirements including surveillance and frequency Notes. For CTS T4.1-1, No. 3 (SRNM), explain the translation of SR test S/U(2)\*2 into ITS SR 3.3.1.8 (below P-6 in Mode 2) and into SR 3.3.1.7 (Modes 3(a), 4(a), and 5(a)).

**ENTERGY Response:**

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Items 51 & 52

Comment(s) withdrawn

**RAI 3.3.1.32 (Item 53)**

The Note to SR 3.3.1.9 (TADOT) is required for each CTS function with this SR. Provide a safety basis justification for the CTS changes.

**ENTERGY Response:**

---

Items 54 & 55

Comment(s) withdrawn

**RAI 3.3.1.33 (Item 56)**

Provide a safety basis justification for the SRs added to ITS F.14 (SG Level Low and Coincident with Mismatch) and for ITS F.16 (SI input from Engineered Safeguard Feature Actuation System (ESFAS)).

**ENTERGY Response:**

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Items 57, 58, 59, 60, 61, 62 & 63

Comment(s) withdrawn

**RAI 3.3.1.34 (Item 64)**

The list in DOC 26.b does not justify requiring 2 channels of ITS T3.3.1-1, F.17.e. Revise DOC A.26.b to provide a design basis for the proposed ITS required channels.

**ENTERGY Response:**

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**RAI 3.3.1.35 (Item 65)**

DOC A.27.c

- (a) Provide a justification for a 1-hour Completion Time to restore inoperable RTBs. This is not a CTS requirement.
- (b) DOC A.27.c does not justify all changes included in the DOC. Revise A.27.
- (c) Notes to Condition L do not match up with CTS T3.5-2, No. 19 # Notes (also see comment 19), therefore not all proposed changes are Administrative.

**ENTERGY Response:**

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Items 66, 67 & 68

Comment(s) withdrawn

**RAI 3.3.1.36 (Item 69)**

Deletions in T3.5-2, No. 19 (RTBs) Column 5 are not evaluated. Provide a DOC.

**ENTERGY Response:**

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Item 70

Comment withdrawn

**RAI 3.3.1.37 (Item 71)**

DOC A.29.e

In DOC A.29.e a TADOT is incorrectly referenced as the test required by ITS SR 3.3.1.5 (T3.3.1-1, F.20).

**ENTERGY Response:**

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**Section 3.4 - Reactor Control System**

**RAI 3.4.01**

ITS LCO 3.4.1.c

CTS 3.1.G.c

CLB

The proposed ITS and CTS require RCS total flow rate to be greater than or equal to 331,840 gpm. The STS has an additional phrase which was not adopted by IP2 (“and greater than or equal to the limit specified in the COLR”). The NUREG markup lists CLB for not adopting the additional phrase. However, CLB is not defined in the justification of differences.

**Comment: Provide a JFD for the CLB listed for ITS LCO 3.4.1.c, SR 3.4.1.3, and SR 3.4.1.1.**

**ENTERGY Response:**

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**RAI 3.4.02 -TS 3.4.1 Applicability Note**

CTS 3.1.G

PA1

JFD PA1 adds the word “increase” to ITS 3.4.1 Applicability Note a and b. This change is not consistent with the STS or CTS. This is not a plant-specific change and as such, the STS wording should be maintained.

**Comment: Maintain the STS wording for ITS 3.4.1 Applicability.**

**ENTERGY Response:**

---

**RAI 3.4.03** CTS 3.1.B.1

LA1

CTS 3.1.B.1 states that “the heatup or cooldown rate shall not exceed 100°F/hr.” This statement is marked as LA1 which would relocate it to the ITS 3.4.3 Bases. This statement does not appear in the Bases. Additionally, this statement is a requirement and not detail that can be relocated to the Bases. Normally, this requirement would be contained within the PTLR. However, IP2 ITS is not adopting a PTLR. Therefore, this specification should be retained in the IP2 ITS 3.4.3

**Comment: Retain CTS 3.1.B.1 statement in the ITS 3.4.3 LCO.**

**ENTERGY Response:**

---

**RAI 3.4.04** CTS 3.1.B.2

CTS 3.1.B.3

CTS 3.1.B.3 footnote

ITS 3.4.3 Bases

LA1

The CTS states that the heatup and cooldown limit lines shall be recalculated periodically using NRC-approved methods and results of surveillance specimen testing as covered in WCAP-7323 and as specified in CTS 3.1.B.3. CTS 3.1.B.3 provides the intervals for removing the six specimens. The ITS 3.4.3 Bases states that the operating pressure/temperature (P/T) limit curves will be adjusted, as necessary, based on the evaluation findings and the recommendations of Regulatory Guide (RG) 1.99. The DOC for this change is LA1, which states that this information is being moved to the Bases. However, the CTS words and details do not appear in the Bases, only the STS wording. LA1 does not provide adequate detail to justify the change from the CTS to the ITS 3.4.3 Bases.

**Comment: Provide additional detail as to why this change is acceptable.**

**ENTERGY Response:**

---

**RAI 3.4.05** ITS Bases SR 3.4.3.1

The ITS Bases SR 3.4.3.1 states the following: “Verification that operation is within the PTLR limits is required every 30 minutes when RCS pressure and temperature conditions are undergoing planned changes.” The IP2 ITS does not have a PTLR.

**Comment: Correct the statement in Bases to describe where the limits are, i.e., Figure 3.4.3-1 and Figure 3.4.3-2.**

**ENTERGY Response:**

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**RAI 3.4.06** CTS 4.3.a  
CTS 4.3.b  
R10

The CTS markup for ITS Section 3.4.3 shows that CTS 4.3.a and 4.3.b are being relocated, R.10. However, the relocation documentation shows the entire CTS 4.3 as being relocated. Correct the documentation to show what is being relocated. If only CTS 4.3.a and 4.3.b are being relocated, then this change should be documented as an LA since the entire specification is not being relocated. Specifically, state where this information is going, i.e., Bases, Updated Final Safety Analysis Report (UFSAR), or Technical Requirements Manual (TRM).

**Comment: Correct as noted above.**

**ENTERGY Response:**

---

**RAI 3.4.07** CTS 3.1.A.1  
ITS 3.4.4  
M1

The DOC for ITS 3.4.4 describes M1. M1 does not appear on the CTS markup.

**Comment: Correct the CTS markup to illustrate the M1 change.**

**ENTERGY Response:**

---

**RAI 3.4.08** ITS LCO 3.4.5 Note and Note a.  
ITS Bases LCO 3.4.5 third paragraph  
PA1

PA1 proposes to change the phrase “not in operation for  $\leq$ ” with “stopped for up to” in the ITS LCO 3.4.5 Note. The wording in STS LCO 3.4.5 Note was approved generically via Technical Specifications Task Force (TSTF)-153 and therefore should be maintained. PA1 also proposes to add “of” in ITS LCO 3.4.5 Note a. STS LCO 3.4.5 Note a. wording was approved generically via TSTF-286, Revision 2 and therefore should be maintained.

**Comment: Maintain the STS wording for ITS LCO 3.4.5 Note and Note a. Change should also be reflected in the ITS Bases LCO 3.4.5 third paragraph.**

**ENTERGY Response:**

---

**RAI 3.4.09** ITS 3.4.5 Condition D  
ITS 3.4.5 Required Action D.2  
PA1

PA1 proposes to change the second condition of STS 3.4.5 Condition D to “No RCS loops in operation.” The wording in STS 3.4.5 Condition D was approved generically via TSTF-263, Revision 3 and therefore should be maintained. PA1 also proposes to add “of” in ITS 3.4.5 Action D.2. STS 3.4.5 Action D.2 wording was approved generically via TSTF-286, Revision 2 and therefore should be maintained.

**Comment: Maintain the STS wording for ITS 3.4.5 Condition D and Action D.2.**

**ENTERGY Response:**

---

**RAI 3.4.10** ITS SR 3.4.5.2  
CTS 3.1.A.2  
ITS Bases SR3.4.5.2 Insert B.3.4.5-5-01  
M2

The CTS markup shows the addition of the requirement of “secondary side water level  $\geq$  0% narrow range.” M2 describes this additional acceptance criteria. ITS SR 3.4.5.2 markup states “secondary side water levels are  $\geq$  17% narrow range.” The ITS markup and the CTS markup are not consistent.

**Comment: Correct the ITS, CTS, and ITS Bases markups to illustrate the correct acceptance criteria for secondary side SG water level.**

**ENTERGY Response:**

---

**RAI 3.4.11** ITS SR 3.4.5.3  
ITS Bases SR 3.4.5.3  
PA1  
M3

M3 adds ITS SR 3.4.5.3 to the CTS. STS SR 3.4.5.3 requires that every 7 days, verify correct breaker alignment and indicated power are available to each required pump. IP2 ITS 3.4.5.3 would add “that is not in operation” to the end of the sentence. PA1 does not provide adequate justification for the addition of “that is not in operation” and the proposed change is not consistent with the CTS. Therefore, the STS SR 3.4.5.3 wording should be maintained.

**Comment: Maintain the STS wording for ITS SR 3.4.5.3 and ITS Bases SR 3.4.5.3.**

**ENTERGY Response:**

---

**RAI 3.4.12 ITS Bases 3.4.5 Applicability**  
PA1

ITS Bases 3.4.5 Applicability markup proposes to delete the last two sentences of paragraph one. PA1 does not provide adequate justification for the proposed change.

**Comment: Provide additional justification for the proposed change or maintain the STS Bases 3.4.5 Applicability wording.**

**ENTERGY Response:**

---

**RAI 3.4.13 ITS Bases 3.4.5 Actions D.1, D.2, and D.3**  
PA1

ITS Bases 3.4.5 Actions D.1, D.2, and D.3 markup proposes to delete the following from the STS bases: “except as during conditions permitted by the Note in the LCO section,” and “and opening the RTBs or de-energizing the MG [Motor Generator] sets removes the possibility of an inadvertent rod withdrawal. Suspending the introduction of coolant into the RCS of coolant with boron concentration less than required to meet the minimum SDM [shutdown margin] of LCO 3.1.1 is required to assure continued safe operation.” PA1 does not provide adequate justification for the proposed change.

**Comment: Provide additional justification for the proposed change or maintain the STS Bases 3.4.5 Actions D.1, D.2, and D.3 wording.**

**ENTERGY Response:**

---

**RAI 3.4.14 TS LCO 3.4.6 Note 1**  
ITS Bases LCO 3.4.6 second paragraph  
PA1

PA1 proposes to change the phrase “not in operation for  $\leq$ ” with “stopped for up to” in the ITS LCO 3.4.6 Note. The wording in STS LCO 3.4.6 Note was approved generically via TSTF-153 and therefore should be maintained.

**Comment: Maintain the STS wording for ITS LCO 3.4.6 Note. Change should also be reflected in the ITS Bases LCO 3.4.6 second paragraph.**

**ENTERGY Response:**

---

**RAI 3.4.15 ITS LCO 3.4.6 Note 2**  
CTS 3.1.A.1.d

ITS LCO 3.4.6 Note 2 states that no RCP shall be started with any RCS cold leg temperature less than or equal to the Applicability temperature for LCO 3.4.12, unless the requirements for RCP starting in LCO 3.4.12 are met. CTS 3.1.A.1.d specifically states that the requirements of CTS 3.1.A.4 shall be adhered to when starting an RCP with no other RCP operating. CTS 3.1.A.1.d applies to the first RCP startup while ITS LCO 3.4.6 Note 2 refers to all RCP startups. No justification was provided for this inconsistency. Additionally, RCP startup requirements do not appear to meet the requirements of 50.36. As such, ITS LCO 3.4.6 Note 2 should say something similar to no RCP shall be started with any RCS cold leg temperature  $\leq 280^{\circ}\text{F}$  unless specified by procedure (or TRM). Refer to ITS 3.4.12 RAIs for additional questions on RCP startup.

**Comment: Provide justification for the differences in the CTS and ITS regarding RCP in ITS LCO 3.4.6 Note 2. Revise Note 2 to refer to specific temperature and not to the LTOP Applicability. Revise the remainder of Note 2 to reflect the revisions to 3.4.12 based on RAIs.**

**ENTERGY Response:**

---

**RAI 3.4.16** ITS SR 3.4.6.3  
ITS Bases SR 3.4.6.3  
M3

M3 adds ITS SR 3.4.6.3 to the CTS. STS SR 3.4.6.3 requires that every 7 days, verify correct breaker alignment and indicated power are available to each required pump. IP2 ITS 3.4.6.3 would add "that is not in operation" to the end of the sentence. No JFD was provided for this change. Additionally, the proposed change is not consistent with the CTS. Therefore, the STS SR 3.4.6.3 wording should be maintained.

**Comment: Maintain the STS wording for ITS SR 3.4.6.3 and ITS Bases SR 3.4.6.3.**

**ENTERGY Response:**

---

**RAI 3.4.17** ITS Bases 3.4.6 Actions B.1 and B.2  
PA1

PA1 proposes to change the first sentence of ITS Bases 3.4.6 Actions B.1 and B.2 to state "...or no loop is in operation." This wording is not consistent with ITS 3.4.6 Condition B which states "Required loop not in operation."

**Comment: Maintain the STS Bases 3.4.6 Actions B.1 and B.2 wording.**

**ENTERGY Response:**

---

**RAI 3.4.18** ITS Bases 3.4.6 Actions B.1 and B.2  
PA1

PA1 proposes to delete the following sentence in ITS Bases 3.4.6 Actions B.1 and B.2: "The required margin to criticality must not be reduced in this type of operation." PA1 did not provide adequate justification for the deletion of the sentence which should be retained.

**Comment: Maintain the STS Bases 3.4.6 Actions B.1 and B.2 wording.**

**ENTERGY Response:**

---

**RAI 3.4.19** ITS LCO 3.4.7 Note 1 and 1.a  
ITS Bases LCO 3.4.7 second paragraph  
PA1

PA1 proposes to change the phrase "not in operation for  $\leq$ " with "stopped for up to" in the ITS LCO 3.4.7 Note 1. The wording in STS LCO 3.4.7 Note 1 was approved generically via TSTF-153 and therefore should be maintained. PA1 also proposes to add "of" in ITS LCO 3.4.7 Note 1.a. STS LCO 3.4.7 Note 1.a wording was approved generically via TSTF-286, Revision 2 and therefore should be maintained.

**Comment: Maintain the STS wording for ITS LCO 3.4.7 Note 1 and Note 1.a. Change should also be reflected in the ITS Bases LCO 3.4.7 second paragraph.**

**ENTERGY Response:**

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**RAI 3.4.1.20** ITS LCO 3.4.7 Note 3  
CTS 3.1.A.1.d

ITS LCO 3.4.7 Note 3 states that no RCP shall be started with any RCS cold leg temperature less than or equal to the Applicability temperature for LCO 3.4.12, unless the requirements for RCP starting in LCO 3.4.12 are met. CTS 3.1.A.1.d specifically states that the requirements of CTS 3.1.A.4 shall be adhered to when starting an RCP with no other RCP operating. CTS 3.1.A.1.d applies to the first RCP startup while ITS LCO 3.4.7 Note 3 refers to all RCP startups. No justification was provided for this inconsistency. Additionally, RCP startup requirements do not appear to meet the requirements of 50.36. As such, ITS LCO 3.4.7 Note 3 should say something similar to no RCP shall be started with any RCS cold leg temperature  $\leq 280^{\circ}\text{F}$  unless specified by procedure (or TRM). Refer to ITS 3.4.12 RAIs for additional questions on RCP startup.

**Comment: Provide justification for the differences in the CTS and ITS regarding RCP in ITS LCO 3.4.7 Note 3. Revise Note 3 to refer to specific temperature and not to the LTOP Applicability. Revise the remainder of Note 3 to reflect the revisions to 3.4.12 based on RAIs.**

**ENTERGY Response:**

---

**RAI 3.4.21 ITS SR 3.4.7.3**

M3

M3 adds ITS SR 3.4.7.3 to the CTS. STS SR 3.4.7.3 requires that every 7 days, verify correct breaker alignment and indicated power are available to each required pump. IP2 ITS 3.4.7.3 would add "that is not in operation" to the end of the sentence. No JFD was provided for this change. Additionally, the proposed change is not consistent with the CTS. Therefore, the STS SR 3.4.7.3 wording should be maintained.

**Comment: Maintain the STS wording for ITS SR 3.4.7.3.**

**ENTERGY Response:**

---

**RAI 3.4.22 ITS LCO 3.4.8 Note 1 and 1.b**

ITS 3.4.8 Required Action B.1

ITS Bases LCO 3.4.8 second paragraph

PA1

PA1 proposes to change the phrase "not in operation for  $\leq$ " with "stopped for up to" in the ITS LCO 3.4.8 Note 1. The wording in STS LCO 3.4.8 Note 1 was approved generically via TSTF-153 and therefore should be maintained. PA1 also proposes to add "of" in ITS LCO 3.4.8 Note 1.b and Required Action B.1. STS LCO 3.4.8 Note 1.b and Required Action B.1 wording was approved generically via TSTF-286, Revision 2 and therefore should be maintained.

**Comment: Maintain the STS wording for ITS LCO 3.4.8 Note 1, Note 1.b, and Required Action B.1. Change should also be reflected in the ITS Bases LCO 3.4.7 second paragraph.**

**ENTERGY Response:**

---

**RAI 3.4.23 ITS SR 3.4.8.2**

ITS Bases SR 3.4.8.2

M3

PA1

M3 adds ITS SR 3.4.8.2 to the CTS. STS SR 3.4.8.2 requires that every 7 days, verify correct breaker alignment and indicated power are available to each required pump. IP2 ITS 3.4.8.2 would add "that is not in operation" to the end of the sentence. PA1 does not provide adequate justification for the addition of "that is not in operation" and the proposed change is not consistent with the CTS. Therefore, the STS SR 3.4.8.2 wording should be maintained.

**Comment: Maintain the STS wording for ITS SR 3.4.8.2 and ITS Bases SR 3.4.8.2.**

**ENTERGY Response:**

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**RAI 3.4.24 ITS LCO 3.4.9 a.**

X.1

L1

ITS LCO 3.4.9 a. requires that the pressurizer water level  $\leq 60.6\%$ . The CTS markup and DOC L1 also discuss the pressurizer water level  $\leq 60.6\%$ . However, JFD X1 states that the upper limit on the pressurizer water level is 60.3%. Pressurizer water level should be consistent on all markups, DOCs and JFDs.

**Comment: Correct the appropriate documentation to support the pressurizer water level in ITS 3.4.9 a.**

**ENTERGY Response:**

---

**RAI 3.4.25 ITS SR 3.4.9.1**

PA1

PA1 adds the word "actual" to ITS SR 3.4.9.1. This word is not necessary and not a plant specific or approve generic change. Therefore, the original STS SR 3.4.9.1 wording should be maintained.

**Comment: Maintain the STS SR 3.4.9.1 wording.**

**ENTERGY Response:**

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**RAI 3.4.26 STS SR 3.4.9.3**

ITS LCO 3.4.9.b.

DB2

Insert 3.4.9-1-01

STS Bases SR 3.4.9.3

ITS LCO 3.4.9.b requires two groups of pressurizer heaters OPERABLE with the capacity of each group  $\geq 150$  kW with each group powered from a different safeguards power train. STS SR 3.4.9.3 was not adopted in the IP2 ITS but would require the verification of the required pressurizer heaters are capable of being powered from an emergency power supply. IP2 ITS should adopt STS SR 3.4.9.3 to ensure compliance with ITS LCO 3.4.9.b.

Proposed wording for the SR could be: Verify each group of required pressurizer heaters are powered from a different safeguards power train.

**Comment: Adopt STS SR 3.4.9.3 and associated Bases to ensure compliance with ITS LCO 3.4.9.b.**

**ENTERGY Response:**

---

**RAI 3.4.27** CTS 3.1.A.3.a  
LA1

CTS 3.1.A.3.a requires at least one pressurizer code safety valve to be operable, or an opening greater than or equal to the size of one code safety valve flange whenever the reactor head is on. According to LA1, this spec is being moved to either the TRM or the UFSAR. LA1 should be more specific on the exact relocation of this spec.

**Comment: LA1 should state the exact location where CTS 3.1.A.3.a is being moved.**

**ENTERGY Response:**

---

**RAI 3.4.28** CTS Table 4.1-1 number 34  
LA3

CTS Table 4.1-1 number 34 lists the minimum frequencies for checks, calibrations, and tests of the safety valve position indicator (acoustic monitor) instrument channel. According to LA3, this spec is being moved to either the TRM or the UFSAR. LA3 should be more specific on the exact relocation of this spec.

**Comment: LA3 should state the exact location where CTS Table 4.1-1 number 34 is being moved.**

**ENTERGY Response:**

---

**RAI 3.4.29** ITS 3.4.10  
PA1

PA1 adds the word "set" to the LCO 3.4.10 statement. This proposed change is not consistent with the CTS or the STS and is not a plant-specific change. Therefore, the STS 3.4.10 LCO wording should be used.

**Comment: Adopt the STS LCO 3.4.10 wording.**

**ENTERGY Response:**

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**RAI 3.4.30** ITS 3.4.10 Applicability  
PA1  
CTS 3.1.A.3.b  
M1  
ITS Bases 3.4.10 Background third paragraph  
ITS Bases 3.4.10 Applicability second paragraph

PA1 does not describe the proposed change. The proposed change adds Insert 3.4.10-01 which states “greater than the applicability temperature for LCO 3.4.12, ‘Low Temperature Overpressure Protection (LTOP)’;” to the Applicability statement. This change was described as a more restrictive change (M1) in the CTS, however, the proposed change is not consistent with STS 3.4.10 Applicability. Since IP2 is not using a PTLR in the ITS, the actual arming temperature of 280 °F should be used in the Applicability statement.

**Comment: Change the wording of the of the Applicability statement to “MODE 4 with all RCS [reactor coolant system] cold leg temperatures > 280°F.” Correct the wording in ITS Bases 3.4.10 Background paragraph 3 and Applicability paragraph 2 to reflect this change.**

**ENTERGY Response:**

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**RAI 3.4.31** ITS 3.4.10 Action B.2  
PA1  
ITS Bases 3.4.10 Actions B.1 and B.2

PA1 does not describe the proposed change. The propose change to ITS 3.4.10 Action B.2 state “Be in MODE 4 with any RCS cold leg temperature  $\leq$  LTOP Applicability temperature specified in LCO 3.4.12.” Since IP2 is not utilizing the PTLR in the ITS, this action statement should reflect the actual temperature and not the applicability of LCO 3.4.12. ITS 3.4.10 Action B.2 should state the following: “Be in MODE 4 with any RCS cold leg temperature  $\leq$  280°F.”

**Comment: Change the wording of ITS 3.4.10 Action B.2 to “Be in MODE 4 with any RCS cold leg temperature  $\leq$  280°F.” Correct the wording in ITS Bases 3.4.10 Actions B.1 and B.2 to reflect this change.**

**ENTERGY Response:**

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**RAI 3.4.32** ITS 3.4.11 Actions Note 1  
A.4

A.4 adds Note 1 to the ITS 3.4.11 Actions Statement which states “separate condition entry is allowed for each PORV.” This note was not in the CTS. The addition of this note is a less restrictive change and should be characterized as a L DOC.

**Comment: Change the discussion of changes of A.4 to a L DOC.**

**ENTERGY Response:**

---

**RAI 3.4.33** CTS Table 4.1-1 number 36  
LA1

CTS Table 4.1-1 number 36 lists the minimum frequencies for checks, calibrations, and tests of the power operated relief valve (PORV) Actuation/Reclosure Setpoints instrument channel. According to LA1, this spec is being moved to either the TRM or the UFSAR. LA1 should be more specific on the exact relocation of this spec.

**Comment: LA1 should state the exact location where CTS Table 4.1-1 number 36 is being moved.**

**ENTERGY Response:**

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**RAI 3.4.34** ITS 3.4.11 Action B.3  
ITS 3.4.11 Action C.2  
ITS Bases Actions B.3 and C.2  
X.1  
M3  
M4

STS 3.4.11 Action B.3 requires the restoration of a PORV to OPERABLE status within 72 hours. STS 3.4.11 Action C.2 requires the restoration of a block valve to OPERABLE status within 72 hours. ITS 3.4.11 Actions B.3 and C.2 propose completion times of 7 days. JFD X.1 states that this change is acceptable because IP2 currently has no requirement to restore an inoperable PORV or block valve to Operable status and is voluntarily adopting this allowable out-of-service time consistent with the 7-day allowable out of service time approved for IP3 in Amendment No. 207. X.1 does not provide adequate justification for the proposed change of 7-day completion time.

**Comment: Provide adequate justification for the 7-day completion time for ITS 3.4.11 Actions B.3 and C.2 or use the STS 3.4.11 completion time of 72 hours. Correct the ITS 3.4.11 Bases according to the response to this RAI.**

**ENTERGY Response:**

---

**RAI 3.4.35** ITS 3.4.11 Bases Background  
Insert B3.4.11-1-01

The second paragraph of the proposed Insert B3.4.11-1-01 needs correction. The second sentence states "Even when in their role of minimizing, typically operate with the PORV block valves closed to minimize the consequences of an inadvertent opening of a PORV." As stated, this sentence is not clear.

**Comment: Correct the sentence discussed above in proposed Insert B3.4.11-1-01.**

**ENTERGY Response:**

---

**RAI 3.4.36** CTS Table 3.1.A-2  
LA1

The CTS markup of Table 3.1.A-2 shows the 280 °F being replaced with LTOP arming temp in PTLR. The DOC for this change is LA1. LA1 is listed as not being used in Rev. 1. Correct the CTS markup to represent the correct change.

**Comment: Correct the CTS markup Table 3.1.A-2.**

**ENTERGY Response:**

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**RAI 3.4.37** CTS Table 3.1.A-2  
M.3  
ITS SR 3.4.12.8  
CTS Bases  
ITS Bases SR 3.4.12.8 Insert B3.4.12-13-01

CTS Table 3.1.A-2 provides the RCP startup restrictions when the OPS is operable and inoperable. CTS Bases (page 3.1.A-6) states that the RCS is protected against overpressure transients when RCS temperature is less than or equal to 280°F by:....”(2) providing administrative controls on starting of a reactor coolant pump when the primary water temperature is less than the secondary water temperature,....” RCP startup is also governed by ITS Figures 3.4.12-5 and 3.4.12-6. Based on this information, it is not clear why the RCP startup restrictions are being maintained in ITS SR 3.4.12.8. The RCP startup restrictions do not meet the criteria in 50.36 for something that has to be in Technical Specifications. The starting restrictions should be handled under IP2 operating procedures. Additionally, SRs are used to demonstrate that the LCO is being met. ITS SR 3.4.12.8 does not serve this function since RCP startup restrictions are not an SSC that would make the OPS (LTOP) inoperable.

**Comment: Provide additional justification/explanation as to why the RCP startup restrictions are being maintained in ITS SR 3.4.12.8. If ITS SR 3.4.12.8 is deleted and the RCP startup restrictions moved to a licensee controlled document, the associated CTS markup and ITS Bases should be corrected.**

**ENTERGY Response:**

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**RAI 3.4.38** ITS 3.4.12 Note 4 Insert 3.4.12-1-02  
ITS Bases 3.4.12 Insert B 3.4.12-7-02

Insert 3.4.12-1-02 adds Note 4 to the LCO notes which states that “SR 3.4.12.8 shall be met prior to starting a reactor coolant pump (RCP) if no other RCPs are in operation.” This note is not applicable to meeting the LCO and should not be included.

**Comment: Delete Note 4 of ITS Insert 3.4.12-1-02 and the associated ITS Insert B 3.4.12-7 02 Bases.**

**ENTERGY Response:**

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**RAI 3.4.39** ITS 3.4.12 Insert 3.4.12-2-02  
ITS 3.4.12 Condition A  
ITS 3.4.12 Action A2

Insert 3.4.12-2-02 provides the conditions and actions for meeting the requirements of Table 3.4.12-1. The third conditional statement states “combination of pressurizer pressure, pressurizer level and RCS temperature not within Table 3.4.12-1 limits for the number of HHSI pumps and charging pumps capable of injection into the RCS.” According to Table 3.4.12-1, HHSI pumps should not be operating/injecting while in Options C, D, or E (RCS temperature, pressurizer level and pressure mode). As such, the phrase “HHSI pumps and” should be deleted from the third conditional statement of Condition A and Action A2.

**Comment: Delete the phrase “HHSI pumps and” from the third conditional statement in ITS 3.4.12 Condition A and Action A2.**

**ENTERGY Response:**

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**RAI 3.4.40** ITS 3.4.12 Condition B  
PA1

PAI adds the word “properly” to the Condition B statement. This change is neither generic in nature nor plant specific. The STS 3.4.12 Condition C wording should be maintained.

**Comment: Maintain the STS 3.4.12 Condition C wording in ITS 3.4.12 Condition B (except for the PTLR statement).**

**ENTERGY Response:**

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**RAI 3.4.41** ITS 3.4.12 Condition E  
ITS Bases 3.4.12 Condition E, statement c.

The third conditional statement of ITS 3.4.12 Condition E states “LTOP inoperable for any reason other than Condition A or D.” This proposed wording is not consistent with the STS and should include Conditions B and C. Otherwise, Condition E could be entered if Conditions B or C were not met. The associated ITS Bases should also be revised.

**Comment: Include Conditions B and C to the third conditional statement of ITS 3.4.12 Condition E and revise the associated ITS Bases.**

**ENTERGY Response:**

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**RAI 3.4.42** ITS 3.4.12 Action E.1  
Insert 3.4.12-3-01  
CTS 3.1.A.4.b  
CLB1

CTS 3.1.A.4.b states that “if both PORVs or their associated block valves are inoperable, action shall be initiated immediately to place the reactor in a condition where OPS operability is not required.” Insert 3.4.12-3-01 Action E.1 states “initiate action to reduce the number of HHSI pumps and charging pumps capable of injecting into the RCS consistent with Table 3.4.12-1.” These two statements are not the same and no JFD was provided.

**Comment: Correct insert 3.4.12-3-01 to maintain the current licensing basis or provide a JFD for the proposed change.**

**ENTERGY Response:**

---

**RAI 3.4.43** ITS SR 3.4.12.2  
Insert 3.4.12-3-04

Insert 3.4.12-3-04 provides the SRs for meeting the requirements of Table 3.4.12-1 when in Options C, D, or E. The SR statement states “verify that the combination of pressurizer pressure, pressurizer level and RCS temperature is within the limits of the Figure specified in Table 3.4.12-1 for the number of HHSI pumps and charging pumps capable of injection into the RCS.” According to Table 3.4.12-1, HHSI pumps should not be operating/injecting while in Options C, D, or E (RCS temperature, pressurizer level and pressure mode). As such, the phrase “HHSI pumps and” should be deleted from ITS SR 3.4.12.2.

**Comment: Delete the phrase “HHSI pumps and” from ITS SR 3.4.12.2.**

**ENTERGY Response:**

---

**RAI 3.4.44** ITS 3.4.12 Table 3.4.12-1  
Option I

**Comment: Add “square” in between “5” and “inch” for the relief capacity or vent size of Option I on ITS Table 3.4.12-1.**

**ENTERGY Response:**

---

**RAI 3.4.45** ITS Bases 3.4.12 Applicable Safety Analyses  
ITS 3.4.12 Applicability

The second sentence of ITS Bases 3.4.12 Applicable Safety Analyses adds the word “all” to state “In MODES 1, 2, and 3, and MODE 4 with all RCS cold leg temperature exceeding...” The word all is not consistent with the proposed wording in the ITS 3.4.12 Applicability statement which uses the word “any.”

**Comment: Correct the Bases or ITS Applicability statements such that are consistent with the use of the word “all” or “any”.**

**ENTERGY Response:**

---

**RAI 3.4.46** ITS Bases 3.4.12 Applicable Safety Analyses  
Page B 3.4.12-4

On page B 3.4.12-4, the ITS proposes to delete portions of the STS Applicable Safety Analyses based on the current licensing basis. However, the following should be maintained in the ITS Bases since it is applicable.

“The following are required during the LTOP MODES to ensure that mass and heat input transients do not occur, which either of the LTOP overpressure protection means cannot handle:

- b. Deactivating the accumulator discharge isolation valves in their closed positions, and
- c. Disallowing start of an RCP if secondary temperature is more than [50] °F above primary temperature in any one loop. LCO 3.4.6, ‘RCS Loops - MODE 4’ and LCO 3.4.7, ‘RCS Loops - MODE 5, Loops Filled,’ provide this protection.”

**Comment: Include the quoted portion of the STS 3.4.12 Applicable Safety Analyses Bases into the ITS Bases.**

**ENTERGY Response:**

---

**RAI 3.4.47** ITS Bases 3.4.12 Action E.1

ITS Bases 3.4.12 Action E.1 proposes to state that “the vent must be consistent with RCS injection capability to ensure that the flow capacity is greater than that required for the worst case mass input transient reasonable during the applicable MODES.” The proposed wording is vague and should be more specific. The staff proposes the following: “the vent must be consistent with Table 3.4.12-1 Options F, G, H, or I to ensure that the flow...” With the staff’s proposed modification, Insert B 3.4.12-10-02 is not required.

**Comment: Modify the ITS Bases 3.4.12 Action E wording to specifically address the vent size.**

**ENTERGY Response:**

---

**RAI 3.4.48** ITS Bases 3.4.12 SR 3.4.12.6

The ITS Bases 3.4.12 SR 3.4.12.6 is modified to state “performance of a COT is required within 12 hours after decreasing RCS temperature to less than or equal to LTOP Applicability temperature and...” This proposed word is not consistent with the ITS SR 3.4.12 wording which uses 280 °F. The ITS Bases SR 3.4.12.6 should be corrected to match the ITS SR 3.4.12.6 wording.

**Comment: Correct the ITS Bases SR 3.4.12.6 wording to state 280 °F.**

**ENTERGY Response:**

---

**RAI 3.4.49** ITS 3.4.12 DOC A4

**Comment: A4 could not be located in the CTS markup but it is listed in the DOC section.**

**ENTERGY Response:**

---

**RAI 3.4.50** ITS 3.4.12 DOC LA3

**Comment: LA3 could not be located in the CTS markup but it is listed in the DOC section.**

**ENTERGY Response:**

---

**RAI 3.4.51** CTS 3.1.F.2.a(1)  
ITS 3.4.13 Completion Time B.2  
L1

CTS 3.1.F.2.a(1) requires that for any steam generator tube leakage greater than 150 gpd, the reactor shall be brought to the cold shutdown condition within 24 hours. L1 provides the justification for the 4-hour completion time in ITS 3.4.13 Action A.1 but does not provide any justification for the increase time to bring the reactor to MODE 5 (CTS has 24 hours versus ITS 3.4.13 Action B2 has 36).

**Comment: Provide justification for the change in completion time to MODE 5 from 24 hours to 36 hours or retain the CTS completion time of 24 hours.**

**ENTERGY Response:**

---

**RAI 3.4.52** CTS Basis paragraph e  
CTS page 3.1.F-7  
Relocated Requirement R-11  
CTS Markup page 3.1.F-7

CTS Relocated Requirement page 3.1.F-7, Revision 1 has paragraph e marked as R.11. The CTS markup page 3.1.F-7, Revision 1 has the entire page including paragraph e marked as A1. Revision 1 of the relocated requirement page and revision 1 of the CTS markup page are not consistent.

**Comment: Provide the correct markup for the relocation requirement R-11 or basis reformatting (A1) for page 3.1.F-7.**

**ENTERGY Response:**

---

**RAI 3.4.53** ITS Bases 3.4.13 Applicable Safety Analysis  
ITS LCO 3.4.13  
STS LCO 3.4.13.d  
CLB1  
STS Bases LCO 3.4.13.d

ITS LCO 3.4.13 is not adopting STS LCO 3.4.13.d which would require 1 gpm total primary to secondary LEAKAGE through all steam generators (SGs) since it is not part of the current licensing basis. However, ITS Bases 3.4.13 Applicable Safety Analysis discusses the safety analysis for an event resulting in steam discharge to the atmosphere. This analysis assumes a 1.2 gpm primary to secondary leakage as an initial condition. Since the 1.2 gpm primary to secondary leakage through all SGs is an initial condition of an accident or transient analysis, STS LCO 3.4.13.d meets criterion 2 of 10 CFR 50.36 and therefore should be adopted into the ITS.

**Comment: Adopt STS LCO 3.4.13.d and add the associated section into the ITS Bases LCO 3.4.13.**

**ENTERGY Response:**

---

**RAI 3.4.54** ITS SR 3.4.14.1 Frequency  
CTS 4.16.A.5  
A6  
ITS Bases SR 3.4.14.1  
PA1

A6 discusses the replacement of the CTS 4.16.A.5 wording “every time the plant is placed in the cold shutdown condition for refueling,” with “24 months and IST program.” However, the ITS SR 3.4.14.1 Frequency shown in the markup does not include the 24-month frequency and only requires “In accordance with the Inservice Testing Program.” Additionally, the ITS Bases for SR 3.4.14.1 discusses that testing is to be performed every 24 months. The ITS SR 3.4.14.1 Frequency in the ITS markup is not consistent with the proposed changes to the CTS and the ITS Bases.

**Comment: Correct the ITS SR 3.4.14.1 Frequency to show the testing frequency to be “In accordance with the Inservice Testing Program and 24 months.”**

**ENTERGY Response:**

---

**RAI 3.4.55** CTS Basis last paragraph on page 3.1.F-8  
Relocated Requirement R-11  
CTS Markup pages 3.1.F-8 and 3.1.F-9

CTS Relocated Requirement page 3.1.F-8, Revision 1 has the last paragraph marked as R.11. The CTS markup page 3.1.F-8, Revision 1 has the entire page including the last paragraph marked as A1. Revision 1 of the relocated requirement page and revision 1 of the CTS markup page are not consistent.

**Comment: Provide the correct markup for the relocation requirement R-11 or basis reformatting (A1) for pages 3.1.F-8 and 3.1.F-9.**

**ENTERGY Response:**

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**RAI 3.4.56** CTS Table 4.1-1 item 21e  
LA1

CTS Table 4.1-1 number 21e lists the minimum frequencies for checks, calibrations, and tests of the containment fan cooler condensate flow instrument channel. According to LA1, this spec is being moved to either the TRM or the UFSAR. LA1 should be more specific on the exact relocation of this spec.

**Comment: LA1 should state the exact location where CTS Table 4.1-1 number 21e is being moved.**

**ENTERGY Response:**

---

**RAI 3.4.57** ITS 3.4.16 Condition C  
M3  
X1

The ITS markup for the second condition of 3.4.16 Condition C is not consistent with the 3.4.16 Required Action A.1. Specifically, Required Action A.1 requires the verification of DOSE EQUIVALENT I-131 is  $\leq 60 \mu\text{Ci/gm}$  and does not reference the acceptable region of Figure 3.4.16-1. The second condition of 3.4.16 Condition C refers to the acceptable region of Figure 3.4.16-1. IP2 did not adopt Figure 3.4.16-1 in its conversion. The ITS Bases for Condition C correctly reflects the limit of  $60 \mu\text{Ci/gm}$ .

**Comment: Correct the ITS markup for ITS 3.4.16 Condition C.**

**ENTERGY Response:**

---

**Section 3.5 - Emergency Core Cooling Systems**

**ENTERGY Response:**

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**RAI 3.5.01** ITS 3.5.1 Condition A  
PA1

PA1 adds "of SR 3.5.1.4" to the end of ITS 3.5.1 Condition A statement. This change is neither plant specific nor consistent with the CTS. The STS wording should be maintained.

**Comment: Maintain the STS wording for ITS 3.5.1 Condition A.**

**ENTERGY Response:**

---

**RAI 3.5.02** ITS SR 3.5.1.2  
ITS SR 3.5.1.4  
X1  
CLB

Page 3.5.1-2 of the ITS lists X1 and CLB for changes associated with ITS SR 3.5.1.2 and SR 3.5.1.4. X1 and CLB are not defined in the JFD section of ITS 3.5.1.

**Comment: Defined X1 and CLB in the JFD section of ITS 3.5.1.**

**ENTERGY Response:**

---

**RAI 3.5.03** ITS SR 3.5.1.2  
CTS 3.3.A.1.c

ITS SR 3.5.1.2 requires the verification of borated water volume in each accumulator to be less than or equal to 920 cubic feet. CTS 3.3.A.1.c requires a maximum water volume of 875 cubic feet. The proposed limit of 920 cubic feet is not consistent with the CTS. No explanation for the change was provided.

**Comment: Use the CTS value of 875 cubic feet or provide adequate justification for using 920 cubic feet in the SR.**

**ENTERGY Response:**

---

**RAI 3.5.04** ITS SR 3.5.1.4  
CTS 3.3.A.1.c

ITS SR 3.5.1.4 requires the verification of boron concentration in each accumulator to be less than or equal to 2500 ppm. CTS 3.3.A.1.c requires a boron concentration of at least 2000 ppm. The 2500 ppm does not appear in the current TS. No explanation was provided for the upper limit of 2500 ppm.

**Comment: Provide adequate justification for the use of 2500 ppm as an upper limit in ITS SR 3.5.1.4.**

**ENTERGY Response:**

---

**RAI 3.5.05** CTS 4.5.A.1.a

CTS 4.5.A.1.a shows the deletion of the following phrase: "With the Reactor Coolant System pressure less than or equal to 350 psig and temperature less than or equal to 350°F..." No discussion of changes was included on the CTS for the deletion of this phrase.

**Comment: Provide a DOC for the proposed change.**

**ENTERGY Response:**

---

**RAI 3.5.06** ITS Bases 3.5.2 Applicable Safety Analyses  
Insert B.3.5.2-04-01

Insert B.3.5.2-04-01 needs clarification, specifically the phrase "while the train was assumed to operate in the calculation of containment backpressure." It is not clear what this phrase adds to

the Bases. Is containment backpressure required to ensure the remaining two trains operate? Is this part of the IP2 design basis?

**Comment: Clarify the ITS Bases Insert B.3.5.2-04-01.**

**ENTERGY Response:**

---

**RAI 3.5.07** ITS 3.5.3  
M1

The CTS does not contain requirements for an operable emergency core cooling system train in Mode 4. IP2 has voluntarily adopted STS 3.5.3 with modifications. M1 describes the adoption of ITS 3.5.3. However, the description of changes section of M1 is not complete and M1 does not explain why the HHSI is not required in Mode 4. M1 justification should be expanded to include the reasons why (design basis and/or Chapter 14 analyses) HHSI is not needed or required to be Operable in Mode 4.

**Comment: Expand the M1 DOC to explain why HHSI is not needed or required to be Operable in Mode 4.**

**ENTERGY Response:**

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**RAI 3.5.08** CTS Table 4.1-2 Item 3  
M2

The CTS markup of Table 4.1-2 Item 3 shows the change of minimum time between tests from 45 days to the requirements of ITS SR 3.0.2. M2 is listed as the justification for this change. However, M2 does not discuss this change.

**Comment: Provide the appropriate discussion of changes for CTS Table 4.1-2 Item 3.**

**ENTERGY Response:**

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**RAI 3.5.09** ITS 3.5.4 Condition A

ITS 3.5.4 Condition A proposes to add the applicable SRs to the end of the condition statements. These proposed changes are not consistent with the CTS or the STS. No plant-specific justification was provided for the proposed changes.

**Comment: Maintain the STS wording for ITS 3.5.4 Condition A.**

**ENTERGY Response:**

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**RAI 3.5.10** ITS 3.5.4 Condition B

Insert 3.5.4-1-01

ITS SR 3.5.4.4

Insert 3.5.4-2-01

ITS Bases 3.5.4 Inserts B.3.5.4-4-01, B.3.5.4-4-02, B.3.5.4-5-01, and B.3.5.4-6-01

ITS 3.5.4 Insert 3.5.4-1-01 adds Condition B which requires the restoration of the RWST level low low alarm to OPERABLE status within 7 days if one of the two required channels of the RWST level low low alarm is inoperable. The location of this proposed change is not consistent with the STS and should be located in ITS 3.3.2. The associated SR, ITS SR 3.5.4.4, should also be located in ITS 3.3.2. Additionally, no justification was provided for the proposed location of Condition B and SR 3.5.4.4.

**Comment: Relocate ITS 3.5.4 Condition B, SR 3.5.4.4, and the associated Bases inserts to ITS 3.3.2 and adjust the ITS 3.5.2 conditions accordingly.**

**ENTERGY Response:**

---

**RAI 3.5.11** ITS 3.5.4 Condition D

ITS 3.5.4 Condition D adds the phrase “of Condition A, B, or C” to the condition statement. This change is not consistent with the STS.

**Comment: Maintain the STS wording for STS 3.5.4 Condition C.**

**ENTERGY Response:**

---

**RAI 3.5.12** ITS Bases Applicable Safety Analyses  
DB

Pages B 3.5.4-2 and B 3.5.4-3 delete the discussion in the Bases about the importance of the minimum and maximum boron concentration. Since the minimum and maximum boron concentrations are in the ITS, these discussions should be included in the ITS Bases. The JFD DB for the deletion of these paragraphs did not provide adequate justification for the deletion.

**Comment: Provide adequate justification for the deletion of the paragraphs on Bases pages listed above or maintain the STS wording as applicable to the facility (i.e., since IP2 does not have a BIT, the BIT information does not have to be maintained).**

**ENTERGY Response:**

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**RAI 3.5.13** DOCs A3 and A5

DOCs A3 and A5 refer the reader to DOC LA1. LA1 does not exist in the CTS markup, ITS 3.5.2 or in the DOCs.

**Comment:** Delete the reference to LA1.

**ENTERGY Response:**

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**Section 3.6 - Containment Systems** (RAIs have been issued previously)

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**Section 3.7 - Plant Systems** (Under staff Review)

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**Section 3.8 - Electrical Power Systems**

**RAI 3.8.2-1**  
ITS 3.8.2.B, JFD DB2

Insert 3.8.2-2-01 is not consistent with NUREG-1431, Rev. 2. In that the marked-up page. Conjunction AND is used in place of word OR. The staff deems that when one or more required DG[s] is [are] inoperable, CORE ALTERATION must be suspended immediately.

**Comment:** The licensee to provide detailed justifications or adopt wording AND as currently required in the NUREG's STS after 3.8.2. ACTION B.1.

**ENTERGY Response:**

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**RAI 3.8.3-1**  
ITS LCO 3.8.3.B.1, INSERT B.3.8.3-3-01, JFD DB1

Proposed ITS LCO 3.8.3.B.1 has a Completion time of 2 hours while INSERT B.3.8.3.-01 shown a completion time of "immediately" which also is in agreement with that stated in the marked-up Bases B.3.8.3-3-01.

**Comment:** The licensee to correct Completion time to as "immediately" to agree with the proposed Bases B.3.8.3-3-01.

**ENTERGY Response:**

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**RAI 3.8.3-2**  
ITS SR 3.8.3.1, INSERT B.3.8.3-5-01, JFD None

The proposed INSERT B.3.8.3-5-01 for ITS SR 3.8.3.1 contains a NOTE which is not in NUREG-1431 for STS SR 3.8.3.1, and the proposed BASES for ITS SR 3.8.3.1 does not explain the need for the existence of the proposed NOTE.

**Comment:** Why the change from the STS and a justification is not provided?

**ENTERGY Response:**

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**RAI 3.8.3-3**

ITS SR 3.8.3.4, INSERT B.3.8.3-5-03, JFD None

The proposed INSERT B.3.8.3-5-03 for ITS SR 3.8.3.4 contains a NOTE which is not in the NUREG 1431 for STS SR 3.8.3.3 and the proposed BASES for ITS SR 3.8.3.4 does not explain the need for the existence of the proposed NOTE.

**Comment:** Why the change from the STS and a justification is not provided?

**ENTERGY Response:**

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**RAI 3.8.4-1**

ITS LCO 3.8.3.4, ACTION A, INSERT 3.8.4-1-02, JFD DB.2, CTS 3.7.B.5, CTS 3.7.B.6, DOCs L1, M1

The proposed INSERT 3.8.4-1-02 for ITS LCO 3.8.3.4 is not consistent with that of STS NUREG-1431, Rev. 1, and the proposed ACTION wording "... is supplied from an OPERABLE DC electrical power subsystem" is rather confusing and thus not consistent with the required Class 1E's separation criteria. Additionally, the proposed ACTION A1.1 and ACTION A1.2 are not mutually exclusive.

**Comment:** Why the change from the STS and a justification is not provided? The licensee should retain the STS wording or modify the proposed ACTION wording in both ITS and the associated proposed BASES.

**ENTERGY Response:**

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**RAI 3.8.6-1**

STS SR 3.8.6.1, DB.2

The proposed ITS 3.8.6 is not adopting STS SR 3.8.6 which requires the licensee to verify each battery float current at an interval of 7 days. The remaining proposed ITS SRs have no surveillance activities on the 7-day interval, and thus the operability for each battery is not determined until proposed ITS SR 3.8.6.1, 2, and 3 are conducted. This 31-day duration is unacceptable to the staff.

**Comment:** The licensee to adopt STS SR 3.8.6.1 or proposed equivalent surveillance activities for ensuring that battery operability are determined every 7-day interval. This is a BSI if STS SR 3.8.6.1 is not adopted and incorporated in IP2's proposed ITS.

**ENTERGY Response:**

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**Section 3.9 - Refueling Operations**

**RAI 3.9.3-1**

ITS 3.9.3 RHR AND COOLANT CIRCULATION-HIGH WATER LEVEL  
STS 3.9.5 RHR AND COOLANT CIRCULATION-HIGH WATER LEVEL  
ITS LCO 3.9.3 NOTE  
DOC M.1  
JFD PA.1

The wording of the LCO Note has been changed from, "... may be not in operation for  $\leq$  ..." to, "... may be stopped for up to ...".

**Comment:** The Nuclear Energy Institute (NEI) Technical Specifications Task Force (TSTF) has submitted TSTF-438 which proposes that the Note use the phrase, "... may be removed from operation ...". The proposed ITS wording could mislead the operator into believing that the pump could be inoperable for that time, rather than just not in operation. Suggest adopting the TSTF-438 wording in the limiting condition for operation (LCO) and associated Bases.

**ENTERGY Response:**

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**RAI 3.9.4-1**

ITS 3.9.4 RHR AND COOLANT CIRCULATION-LOW WATER LEVEL  
STS 3.9.6 RHR AND COOLANT CIRCULATION-LOW WATER LEVEL  
ITS LCO 3.9.4 NOTE  
DOC M.1  
JFD PA.1

The wording of the LCO Note has been changed from, "... may be de-energized for  $\leq$  ..." to, "... may be stopped for up to ...".

**Comment:** The NEI TSTF has submitted TSTF-438 which proposes that the Note use the phrase, "... may be removed from operation ...". The proposed ITS wording could mislead the operator into believing that the pump could be inoperable for that time, rather than just not in operation. Suggest adopting the TSTF-438 wording in the LCO and associated Bases.

**ENTERGY Response:**

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**RAI 3.9.4-2**

ITS B3.9.4 RHR AND COOLANT CIRCULATION-LOW WATER LEVEL  
STS B3.9.6 RHR AND COOLANT CIRCULATION-LOW WATER LEVEL  
ITS BASES for ACTIONS B.3, B.4, B.5.1, and B.5.2  
JFD (PA.1)

The ITS changes the wording in the last sentence of the second paragraph of Bases to Required Actions B.3, B.4, B.5.1, and B.5.2 from, "... containment penetrations are either closed or can be closed so that the dose limits are not exceeded" to, "... containment penetrations are either closed or can be closed to limit the potential for a release to the environment."

**Comment:** Why the change; a justification is not provided?

**ENTERGY Response:**

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#### **Section 4.0 - Design Features**

##### **RAI 4.0.01 ITS 4.3.1.2**

ISTS, Rev. 2, 04/30/01 for TS 4.1.3.2.d states:

A nominal [10.95] inch center to center distance between fuel assemblies placed in the storage rack.

Indian Point 2, ITS 4.3.1.2.d states:

A sufficient center-to-center distance between fuel assemblies placed in the storage racks to meet the limit for Keff.

**Comment:** For Indian Point 2 TS 4.3.1.2 d, a plant-specific value of center to center distance between fuel assemblies in the storage racks is needed as in the brackets of the ISTS.

**ENTERGY Response:**

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##### **RAI 4.0.02 ITS 4.3.1.2**

CTS 5.4.2.A The new fuel storage rack is designed so that it is impossible to insert assemblies in other than an array of vertical fuel assemblies with a sufficient center to center distance.

ITS 4.3.1.2.d states:

A sufficient center-to-center distance between fuel assemblies placed in the storage racks to meet the limit for Keff.

ISTS, Rev. 2, 04/30/01 for TS 4.1.3.2.d states:

A nominal [10.95] inch center-to-center distance between fuel assemblies placed in the storage rack.

**Comment:** For Indian Point 2 TS 4.3.1.2 d, a plant-specific value of center-to-center distance between fuel assemblies in the storage racks is needed as in the brackets of the ISTS.

**ENTERGY Response:**

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**Section 5.0 - Administrative Controls**

**RAI 5.0.01** ITS 5.5.7---SG Tube Surveillance Program

CTS4.13—Marked with LA.1 which means to be relocated

STS 5.5.7—Marked with insert 5.5.7/5.5-6-1-01, and the DOC Summary stated that pending approval of NEI 97-06, “Steam Generator Program Guidelines,” IP2 ITS 5.5.7 and CTS 4.1.3 will establish requirements to develop and maintain a program for SG Condition Monitoring Assessment, Performance Criteria, Tube Repair Criteria and Repair Methods and associated reporting requirements.

**Comment:** Recently the licensee indicated that the approval of NEI 97-06 is uncertain, and this will affect the direction of the ITS 5.5.7 conversion. What will be the new plan for the conversion of ITS 5.5.7 from Entergy Nuclear Operation, Inc. if NEI 97-06 is not approved?

**ENTERGY Response:**

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List of Acronyms That May Be Used In This Submittal

AC	Air Conditioning or Alternating Current
ADS	Automatic Depressurization System
AOT	Allowed Outage Time
APLHGR	Average Planar Linear Heat Generation Rate
APRM	Average Power Range Monitor
ASME	American Society of Mechanical Engineers
ASTM	American Society for Testing and Materials
ATWS	Anticipated Transient Without Scram
ATWS-RPT	Anticipated Transient Without Scram - Recirculation Pump Trip
BPWS	Banked Position Withdrawal Sequence
BWR	Boiling Water Reactor
BWROG	Boiling Water Reactor Owners Group
CFR	Code of Federal Regulations
CFT	Channel Functional Test
CLB	Current License Basis
COLR	Core Operating Limits Report
CRD	Control Rod Drive
CRDA	Control Rod Drop Accident
CREF	Control Room Envelope Filtration
CST	Condensate Storage Tank
CTS	Current Technical Specification
DBA	Design-Basis Accident
DC	Direct Current
DG	Diesel Generator
DOC	Discussion of Change (from the CTS)
ECCS	Emergency Core Cooling System
EDG	Emergency Diesel Generator
ESFAS	Engineered Safeguard Feature Actuation System
EFCV	Excess Flow Check Valve
EFPD	Effective Full-Power Day
EFPT	Effective Full-Power Days
EOC-RPT	End of Cycle - Recirculation Pump Trip
EPA	Electrical Protection Assembly
ESF	Engineered Safeguard Feature
ESFAS	Engineered Safeguard Feature Actuation System
FR	Federal Register
F RTP	Fraction of Rated Thermal Power
GDC	General Design Criteria
GE	General Electric
HEPA	High Efficiency Particulate Air
HPCS	High Pressure Core Spray
Hz	Hertz
IRM	Intermediate Range Monitor
IRNM	Intermediate Range Neutron Monitor
ISI	Inservice Inspection

ITS	Improved (converted) Technical Specifications
JFD	Justification For Difference
Kv	Kilovolt
kW	Kilowatt
LAR	Licence Amendment Request
LCO	Limiting Condition for Operation
LHGR	Linear Heat Generation Rate
LLS	Low-Low Set
LOCA	Loss of Coolant Accident
LOOP	Loss of Offsite Power
LOP	Loss of Power
LPCI	Low Pressure Coolant Injection
LPCS	Low Pressure Core Spray
LPRM	Local Power Range Monitor
LSFT	Logic System Functional Test
MCPR	Minimum Critical Power Ratio
MFLPD	Maximum Fraction of Limiting Power Density
MG	Motor Generator
MSIV	Main Steam Isolation Valve
MWD/T	Megawatt Days/short Ton
NMP2	Nine Mile Point Unit 2
NUMAC	Nuclear Measurement Analysis and Control
OPDRV	Operation with a Potential for Draining the Reactor Vessel
PAM	Post-Accident Monitoring
PCT	Peak Centerline Temperature
P/T	Pressure/Temperature
QA	Quality Assurance
RAI	Request for Additional Information
RBM	Rod Block Monitor
RCP	Reactor Coolant Pump
RCS	Reactor Coolant System
RCIC	Reactor Core Isolation Cooling
RCS	Reactor Coolant System
RG	Regulatory Guide
RHR	Residual Heat Removal
RPS	Reactor Protection System
RPV	Reactor Pressure Vessel
RSCS	Rod Sequence Control System
RTP	Rated Thermal Power
RWCU	Reactor Water Cleanup
RWM	Rod Worth Minimizer
SCIV	Secondary Containment Isolation Valve
SDC	Shutdown Cooling
SDM	Shutdown Margin
SDV	Scram Discharge Volume
SE	Safety Evaluation
SER	Safety Evaluation Report
SGT	Standby Gas Treatment

SL	Safety Limit
SLC	Standby Liquid Control
SR	Surveillance Requirement
SRM	Source Range Monitor
SRNM	Source Range Neutron Monitor
SRV	Safety/Relief Valve
SSER	Supplemental Safety Evaluation Report
STS	Improved Standard Technical Specification(s), NUREG-1433/4, Rev. 1
SW	Service Water
TRM	Technical Requirements Manual
TS	Technical Specifications
TSTF	Technical Specifications Task Force (re: generic changes to the STS)