



Entergy Nuclear Northeast  
Entergy Nuclear Operations, Inc  
Indian Point Energy Center  
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PO Box 249  
Buchanan, NY 10511-0249

October 10, 2002

Re: Indian Point Unit No. 2  
Docket No. 50-247  
NL-02-130

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Mail Station O-P1-17  
Washington, DC 20555-0001

Subject: Response to Request for Additional Information Regarding Section 3.6  
(Containment Systems) of the Improved Technical Specifications (ITS)  
(TAC No. MB4739)

Reference: 1) Entergy letter (NL-02-016) to NRC, "License Amendment Request  
(LAR 02-005) Conversion to Improved Standard Technical  
Specifications," dated March 27, 2002  
2) Entergy letter (NL-02-092) to NRC, "Supplement 1 to the Indian  
Point 2 License Amendment Request for Conversion to Improved  
Standard Technical Specifications," dated July 10, 2002  
3) NUREG 1431, "Standard Technical Specifications Westinghouse  
Plants," Revision 2, dated April 2001  
4) 10 CFR 50.36, "Technical Specifications," as amended  
5) NRC letter to Entergy Nuclear Operations, Inc., "Request for  
Additional Information (RAI) Regarding Section 3.6 (Containment  
Systems) of the Improved Technical Specifications (ITS)  
(TAC No. MB4739)," dated August 6, 2002

Dear Sir:

By letter dated March 27, 2002 (Reference 1) as supplemented by letter dated July 10, 2002 (Reference 2), Entergy Nuclear Operations, Inc. (ENO) requested to amend the Indian Point 2 (IP2) Plant Operating License, Appendices A and B, "Technical Specifications." The proposed amendment converts the IP2 Current Technical Specifications (CTS) to Improved Technical Specifications (ITS) in accordance with NUREG 1431, "Standard Technical Specifications Westinghouse Plants," (Reference 3), and the Code of Federal Regulations (CFR) (Reference 4).

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The U.S. Nuclear Regulatory Commission (NRC) staff reviewing the request has determined that additional information is required to complete its review. The request for additional information is dated August 6, 2002 (Reference 5). A list of acronyms that may have been used in this submittal has been provided as Attachment 1 to this letter. Attachment 2 to this letter, "Response to Request for Additional Information Regarding Section 3.6 (Containment Systems) of the Improved Technical Specifications (ITS)," provides ENO's response to the subject request for additional information. The IP2 Actions described in Attachment 2 will be incorporated in a future supplement to the ITS submittal packages.

No new regulatory commitments are being made by ENO in this correspondence.

Should you or your staff have any questions regarding this matter, please contact the IP2 ITS Project Manager, Mr. William Blair at (914) 734-5336.

I declare under penalty of perjury that the foregoing is true and correct.

Sincerely,

Executed on 10/10/02



\_\_\_\_\_  
Fred Dacimo  
Vice President – Operations  
Indian Point 2

Attachments

cc: See page 3

cc:

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**ATTACHMENT 1 TO NL-02-130**

**List of Acronyms That May Be Used In This Submittal**

Entergy Nuclear Operations, Inc.  
Indian Point Unit No. 2  
Docket No. 50-247

List of Acronyms That May Be Used In This Submittal

AC	Air Conditioning or Alternating Current
AOT	Allowed Outage Time
ASME	American Society of Mechanical Engineers
ASTM	American Society for Testing and Materials
ATWS	Anticipated Transient Without Scram
CFR	Code of Federal Regulations
CLB	Current License Basis
COLR	Core Operating Limits Report
COT	Channel Operational Test
CST	Condensate Storage Tank
CTS	Current Technical Specification
DB	Design-Basis
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
ESF	Engineered Safeguard Feature
FR	Federal Register
GDC	General Design Criteria
HEPA	High Efficiency Particulate Air
Hz	Hertz
IRM	Intermediate Range 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
LOCA	Loss of Coolant Accident
LOOP	Loss of Offsite Power
LOP	Loss of Power
MSIV	Main Steam Isolation Valve
NUMAC	Nuclear Measurement Analysis and Control
PAM	Post-Accident Monitoring
P/T	Pressure/Temperature
QA	Quality Assurance
RAI	Request for Additional Information
RCS	Reactor Coolant System
RG	Regulatory Guide

RHR	Residual Heat Removal
RPS	Reactor Protection System
RPV	Reactor Pressure Vessel
RTP	Rated Thermal Power
SDC	Shutdown Cooling
SDM	Shutdown Margin
SE	Safety Evaluation
SER	Safety Evaluation Report
SR	Surveillance Requirement
SRM	Source Range Monitor
STS	Improved Standard Technical Specification(s), NUREG-1431, Rev. 2
SW	Service Water
TRM	Technical Requirements Manual
TS	Technical Specifications
TSTF	Technical Specifications Task Force (re: generic changes to the STS)

**ATTACHMENT 2 TO NL-02-130**

**Response to Request for Additional Information Regarding  
Section 3.6 (Containment Systems) of the Improved Technical Specifications (ITS)**

Entergy Nuclear Operations, Inc.  
Indian Point Unit No. 2  
Docket No. 50-247

Response to Request for Additional Information

The NRC Staff reviewing information provided in the March 27, 2002 license amendment request as supplemented by letter dated July 10, 2002 has determined that additional information is required to complete its review. The following are the specific requests from the NRC staff and ENO's response to those requests.

## 3.6 : CONTAINMENT SYSTEMS

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6 - 1</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

### NRC Request for Additional Information (RAI):

DOC A.3 (Section 3.6.9)  
DOC A.4 (Section 3.6.10)  
DOC M.1 (Sections 3.8.2, 3.8.5, 3.8.8, and 3.8.10)  
DOC L.1 (Sections 3.3.6, 3.3.7, and 3.7.10)  
DOC R.27 (CTS 3.8.B.6, CTS 4.5.F, and STS 3.7.13)  
DOC R.28 (CTS 3.8.B.8 and STS 3.9.4)  
JFD CLB (Sections 3.6.1, 3.6.2, 3.6.3, 3.7.10, and 3.8.5)  
JFD DB.1 (Sections 3.3.6, 3.3.7, 3.7.10, and 3.8.2)  
JFD X.1 (Sections 3.3.6, 3.3.7, 3.6.9, and 3.6.10)  
CTS 3.3.A.1, 3.3.C.1, 3.3.D.1, 3.3.H.1, 3.6.A.1, 3.8.B.6, 3.8.B.8, and 4.5.F  
ITS 3.3.6, 3.3.7, 3.6.1, 3.6.2, 3.6.3, 3.6.9, 3.6.10, 3.7.10, 3.8.2, 3.8.5, 3.8.8, 3.8.10 and associated Bases.  
STS 3.3.6, 3.3.7, 3.3.8, 3.6.1, 3.6.2, 3.6.3, 3.7.10, 3.7.13, 3.8.2, 3.8.5, 3.8.8, 3.8.10, 3.9.4, and associated Bases

NUREG-1431 "Standard Technical Specifications- Westinghouse Plants" Revision 2 was based on TSTF-51, which allowed various components, systems, and structures to be inoperable during movement of recently irradiated fuel. "Recently irradiated fuel" is defined in the STS/TSTF-51 as irradiated "fuel that has occupied part of a critical reactor core within the previous [X] days" where X days has been determined by analysis that after sufficient radioactive decay has occurred, the offsite doses resulting from a fuel handling accident remain below the Standard Review Plan (SRP) limits (well within 10 CFR 100). A review of ITS 3.3, 3.6, 3.7, 3.8 and 3.9 shows that the STS Rev 2/TSTF-51 changes are inconsistent and unacceptable in most areas. The changes made in ITS 3.8 seem to be in conformance with STS Rev 2/TSTF-51 and thus would be acceptable. However, the changes made in the other ITS Sections specified above are not in conformance and thus are unacceptable. The changes made to ITS 3.3.6, 3.3.7, 3.7.10, and their associated Bases deleted "During movement of recently irradiated fuel assemblies" from the APPLICABILITY and the Bases. The changes made to the Bases for ITS 3.6.1, 3.6.2 and 3.6.3 added paragraphs discussing why these systems, components, structures, and surveillances (ITS SR 3.6.3.7) were not required during MODES 5 and 6. In addition, CTS 3.8.B.6, 3.8.B.8, and 4.5.F were relocated out of the CTS by DOCs R.27 and R.28. The justification used for all of these changes is that because Indian Point 2 cannot, and has committed to not move irradiated fuel until the reactor has been sub-critical for at least 100 hours, and the analysis used to determine the offsite doses resulting from a fuel handling accident showed that the doses are below SRP limits (well within 10 CFR 100), thus validating the 100 hours, and this analysis was reviewed and found acceptable by the staff in Amendment 211, dated July 27, 2000. It is the staff's position that STS Rev 2/TSTF-51 did not allow or approve the removal of the "During movement of irradiated fuel assemblies" from the APPLICABILITY, it only allowed the addition of the word "recently", where "recently" is defined in the Bases as discussed above. Thus the APPLICABILITIES would either be "During movement of irradiated fuel assemblies" or "During movement of recently irradiated fuel assemblies". The staff and the licensee cannot definitively state that the licensee would not move irradiated fuel prior to 100 hours. Plant

conditions may require movement prior to 100 hours, or plant and industry design and operational changes may result in the ability to move irradiated fuel prior to 100 hours. In fact, the staff has received TSTF-51 amendment requests where recently is defined in the range of 24 hours to 3 days. The staff cannot accept technical specifications without some requirement or limitations during movement of irradiated fuel assemblies. Therefore it is the staff's position that STS Rev. 2/TSTF-51 be implemented with no changes that is: 1) The APPLICABILITIES for ITS 3.3.6, 3.3.7, 3.7.10 and their associated Bases be modified to include either "During movement of irradiated fuel assemblies" or "During movement of recently irradiated fuel assemblies;" 2) The Bases discussions in ITS 3.6.1, 3.6.2, and 3.6.3 be revised to require these systems, components, and structures be operable during movement of irradiated fuel assemblies or recently irradiated fuel assemblies in accordance with STS 3.9.4; 3) CTS 3.8.B.6, 3.8.B.8 and 4.5.F be retained in the ITS based on STS 3.3.8, 3.7.13 and 3.9.4, 4) ITS 3.6.9 and 3.6.10, because of their operability requirements associated with ITS 3.6.2 and 3.6.3, be reevaluated to determine if they need to be operable "During movement of irradiated fuel assemblies" or during movement of recently irradiated fuel assemblies and 5) that the licensee commits to the guidelines specified in TSTF-51 WOG Insert 0/STS B3.9.4 "Reviewer's Note".

Comment: Comply with this staff position.

### **Entergy (IP2) Response:**

IP2 will incorporate NUREG-1431 requirements that are applicable only during movement of "recently irradiated fuel" except for requirements for Fuel Storage Building Ventilation which were relocated as justified in the SER for IP2 Amendment 229, dated June 11, 2002. This change is being adopted in anticipation of changes to the requirement in CTS 3.8.B.4 (i.e., delay movement of irradiated fuel for 100 hours after reactor shutdown) that is being relocated to the UFSAR by Relocated Item R.24.

IP2 did not incorporate requirements that are applicable only 'during movement of recently irradiated fuel' because the IP2 definition of 'recently' is 100 hours based on the Safety Evaluation Report to Amendment No. 211, July 27, 2000, which addressed 10 CFR 50.67, Accident Source Term.

Please note that IP2 is not in accordance with SRP limits (well within 10 CFR 100) because IP2 CTS Amendment 211, dated July 27, 2000, approved the IP2 adoption of the Alternate Source Term.

### **Entergy (IP2) Action:**

IP2 will revise the following IP2 ITS as follows:

1. IP2 ITS 3.3.6, Containment Purge System and Pressure Relief Line Isolation Instrumentation, and IP2 ITS 3.3.7, Control Room Ventilation System (CRVS) Actuation Instrumentation, and IP2 ITS 3.7.10, Control Room Ventilation System (CRVS), will be revised to include an Applicability of "During movement of recently irradiated fuel." The term "recently" will be defined in the Bases as 100 hours based on the Safety Evaluation Report to Amendment No. 211, July 27, 2000, which addressed 10 CFR 50.67, Accident Source Term.

ISTS 3.3.8, Fuel Handling Building Ventilation Instrumentation, will not be incorporated into the IP2 ITS because requirements for Fuel Storage Building Ventilation were relocated as justified in the SER for IP2 Amendment 229, dated June 11, 2002.

2. Bases for ITS 3.6.1, 3.6.2 and 3.6.3, which added paragraphs discussing why these systems,

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components, structures, and surveillances (ITS SR 3.6.3.7) were not required during MODES 5 and 6, will be revised to explain containment closure in accordance with ITS 3.9.3, Containment Penetrations, is required during movement of recently irradiated fuel.

3. Relocated Item R.28, CTS 3.8.B.8, Containment Penetrations during Refueling Operations, will be retained in the IP2 ITS as ITS 3.9.3, Containment Penetrations. IP2 ITS 3.9.3, 3.9.4 and 3.9.5 will be renumbered accordingly.

Relocated Item R.28, CTS 3.8.B.6 and CTS 4.5.F, governing relocation of requirements for the fuel storage building, will be deleted because these requirements were already relocated out of Technical Specifications in the SER for IP2 Amendment 229, dated June 11, 2002.

4. ITS 3.6.9, Isolation Valve Seal Water, and 3.6.10, Weld Channel and Penetration Pressurization, are not currently required to be Operable during movement of irradiated fuel. Additionally, STS 3.9.4, Containment Penetrations, requires containment closure and not containment integrity. ITS 3.6.9, Isolation Valve Seal Water, is in TS to justify not performing Type C tests on certain containment isolation valves. ITS 3.6.3 does not require that Type C testing is complete prior to moving irradiated fuel; therefore, IVSW is not required prior to moving irradiated fuel. ITS 3.6.10, Weld Channel and Penetration Pressurization, is depressurized and vented during performance of the containment Type A test and does not contribute to containment integrity. Therefore, IP2 ITS 3.6.9 and IP2 ITS 3.6.10 are not required to be Operable during movement of irradiated fuel.

5. IP2 Bases will incorporate guidance in TSTF-51 WOG Insert 0/STS B3.9.4 "Reviewer's Note".

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## 3.6.1 : Containment

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.1 - 1</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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### **NRC Request for Additional Information (RAI):**

DOC A.1

CTS 1.7.e, 3.6.A.1.f, 4.4.A.1, 4.4.A.2, 4.4.F and 4.4.G  
ITS 5.5.14 and 5.5.15.

The markups of CTS 1.7.e, 3.6.A.1.f, 4.4.A.1, 4.4.A.2, 4.4.F and 4.4.G show that the containment leakage requirements are relocated to ITS 5.5.15. ITS 5.5.15 is the "Battery Monitoring and Maintenance Program". The correct specification should be ITS 5.5.14 "Containment Leakage Rate Testing Program." See Comment Numbers 3.6.2-1, 3.6.3-1, and 3.6.10-3.

Comment: Correct this discrepancy.

### **Entergy (IP2) Response:**

Agree

### **Entergy (IP2) Action:**

IP2 revised CTS markup to change ITS 5.5.15 to ITS 5.5.14.

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## 3.6.1 : Containment

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
3.6.1 - 2	MB4739	8/13/2002	10/6/2002

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### **NRC Request for Additional Information (RAI):**

DOC A.3  
DOC LA.1  
CTS 1.7  
ITS B3.6.1 Bases - Background

CTS 1.7 defines CONTAINMENT INTEGRITY. A markup of CTS 1.7 shows that only CTS 1.7.b is relocated to ITS B3.6.1 Bases - Background and the relocation is justified by DOC LA.1. The rest of CTS 1.7 is covered by DOC A.3. DOC A.3 states that portions of CTS 1.7 are covered or relocated to other LCOs in ITS 3.6 and that CONTAINMENT INTEGRITY is changed to containment shall be OPERABLE. DOC A.3 also states that this definition is deleted. While the former statements are correct and acceptable, the latter statement is incorrect. The definition is not deleted but is relocated to ITS B3.6.1 Bases - Background which makes this portion of the change a Less Restrictive (LA) change. See Comment Number 3.6.3.12.

Comment: Revise the CTS markup and the discussions and justifications associated with DOC LA.1 to include the rest of CTS 1.7. Modify DOC A.3 accordingly. See Comment Number 3.6.3.12.

### **Entergy (IP2) Response:**

DOCs A.3 for ITS LCOs 3.6.1, 3.6.2 and 3.6.3 are an explanation that requirements in the definition CTS 1.7, Containment Integrity, are maintained in the ITS as LCOs and SRs in ITS 3.6.1, 3.6.2, 3.6.3 and 3.6.9 and that there is no ITS definition "Containment Integrity."

To clarify the changes, the following sentence:

"In conjunction with this change, the CTS definition of Containment Integrity is deleted because it contains information that is more appropriately contained in the LCOs (and SRs) which establish the requirements for containment integrity and the Bases associated with these LCOs and SRs." will be replaced with the following:

"IP2 ITS does not include a definition for "Containment Integrity" because ITS LCOs 3.6.1, 3.6.2, 3.6.3 and 3.6.9 establish the requirements for containment integrity described in CTS 1.7 as LCOs and SRs."

### **Entergy (IP2) Action:**

IP2 will revise DOCs A.3 for ITS LCOs 3.6.1, 3.6.2 and 3.6.3 to eliminate the statement that the CTS definition of containment Integrity is deleted and replace it with the following: "IP2 ITS does not include a definition for "Containment Integrity" because ITS LCOs 3.6.1, 3.6.2, 3.6.3 and 3.6.9 establish the requirements for containment integrity described in CTS 1.7 as LCOs and SRs."

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## 3.6.1 : Containment

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.1 - 3</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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### **NRC Request for Additional Information (RAI):**

DOC L.1  
CTS 3.6.E  
ITS SR 3.0.1 and associated Bases

The CTS markup of CTS 3.6.E (sic) [CTS 4.4.E] shows that this specification is deleted. This deletion is justified by DOC L.1. DOC L.1 states that this requirement is "Redundant to the requirements in ITS SR 3.0.1 for post maintenance testing that applies to all systems and components governed by Technical Specifications." This makes the change an Administrative change rather than a Less Restrictive (L) change since the specification is relocated and encompassed by ITS SR 3.0.1.

Comment: Revise the CTS markup to show this change as an Administrative change.

### **Entergy (IP2) Response:**

Agree.

### **Entergy (IP2) Action:**

IP2 re-classified this change as Administrative by adding DOC A.5 and marked DOC L.1 as not used. Markups changed accordingly.

## 3.6.1 : Containment

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.1 - 4</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

### NRC Request for Additional Information (RAI):

JFD CLB.1  
CTS 3.6.A.1  
ITS B3.6.1 Bases - Applicability and References  
STS B3.6.1 Bases - Applicability

See Comment Number 3.6.0-1.

Comment: See Comment Number 3.6.0-1

Comment 3.6.0-1 stated the following:

DOC A.3 (Section 3.6.9)  
DOC A.4 (Section 3.6.10)  
DOC M.1 (Sections 3.8.2, 3.8.5, 3.8.8, and 3.8.10)  
DOC L.1 (Sections 3.3.6, 3.3.7, and 3.7.10)  
DOC R.27 (CTS 3.8.B.6, CTS 4.5.F, and STS 3.7.13)  
DOC R.28 (CTS 3.8.B.8 and STS 3.9.4)  
JFD CLB (Sections 3.6.1, 3.6.2, 3.6.3, 3.7.10, and 3.8.5)  
JFD DB.1 (Sections 3.3.6, 3.3.7, 3.7.10, and 3.8.2)  
JFD X.1 (Sections 3.3.6, 3.3.7, 3.6.9, and 3.6.10)  
CTS 3.3.A.1, 3.3.C.1, 3.3.D.1, 3.3.H.1, 3.6.A.1, 3.8.B.6, 3.8.B.8, and 4.5.F  
ITS 3.3.6, 3.3.7, 3.6.1, 3.6.2, 3.6.3, 3.6.9, 3.6.10, 3.7.10, 3.8.2, 3.8.5, 3.8.8, 3.8.10 and associated Bases.  
STS 3.3.6, 3.3.7, 3.3.8, 3.6.1, 3.6.2, 3.6.3, 3.7.10, 3.7.13, 3.8.2, 3.8.5, 3.8.8, 3.8.10, 3.9.4, and associated Bases

NUREG-1431 "Standard Technical Specifications- Westinghouse Plants" Revision 2 was based on TSTF-51, which allowed various components, systems, and structures to be inoperable during movement of recently irradiated fuel. "Recently irradiated fuel" is defined in the STS/TSTF-51 as irradiated "fuel that has occupied part of a critical reactor core within the previous [X] days" where X days has been determined by analysis that after sufficient radioactive decay has occurred, the offsite doses resulting from a fuel handling accident remain below the Standard Review Plan (SRP) limits (well within 10 CFR 100). A review of ITS 3.3, 3.6, 3.7, 3.8 and 3.9 shows that the STS Rev 2/TSTF-51 changes are inconsistent and unacceptable in most areas. The changes made in ITS 3.8 seem to be in conformance with STS Rev 2/TSTF-51 and thus would be acceptable. However, the changes made in the other ITS Sections specified above are not in conformance and thus are unacceptable. The changes made to ITS 3.3.6, 3.3.7, 3.7.10, and their associated Bases deleted "During movement of recently irradiated fuel assemblies" from the APPLICABILITY and the Bases. The changes made to the Bases for ITS 3.6.1, 3.6.2 and 3.6.3 added paragraphs discussing why these systems, components, structures, and surveillances (ITS SR 3.6.3.7) were not required during MODES 5 and 6. In addition, CTS 3.8.B.6,

3.8.B.8, and 4.5.F were relocated out of the CTS by DOCs R.27 and R.28. The justification used for all of these changes is that because Indian Point 2 cannot, and has committed to not move irradiated fuel until the reactor has been sub-critical for at least 100 hours, and the analysis used to determine the offsite doses resulting from a fuel handling accident showed that the doses are below SRP limits (well within 10 CFR 100), thus validating the 100 hours, and this analysis was reviewed and found acceptable by the staff in Amendment 211, dated July 27, 2000. It is the staff's position that STS Rev 2/TSTF-51 did not allow or approve the removal of the "During movement of irradiated fuel assemblies" from the APPLICABILITY, it only allowed the addition of the word "recently", where "recently" is defined in the Bases as discussed above. Thus the APPLICABILITIES would either be "During movement of irradiated fuel assemblies" or "During movement of recently irradiated fuel assemblies". The staff and the licensee cannot definitively state that the licensee would not move irradiated fuel prior to 100 hours. Plant conditions may require movement prior to 100 hours, or plant and industry design and operational changes may result in the ability to move irradiated fuel prior to 100 hours. In fact, the staff has received TSTF-51 amendment requests where recently is defined in the range of 24 hours to 3 days. The staff cannot accept technical specifications without some requirement or limitations during movement of irradiated fuel assemblies. Therefore it is the staff's position that STS Rev. 2/TSTF-51 be implemented with no changes that is: 1) The APPLICABILITIES for ITS 3.3.6, 3.3.7, 3.7.10 and their associated Bases be modified to include either "During movement of irradiated fuel assemblies" or "During movement of recently irradiated fuel assemblies;" 2) The Bases discussions in ITS 3.6.1, 3.6.2, and 3.6.3 be revised to require these systems, components, and structures be operable during movement of irradiated fuel assemblies or recently irradiated fuel assemblies in accordance with STS 3.9.4; 3) CTS 3.8.B.6, 3.8.B.8 and 4.5.F be retained in the ITS based on STS 3.3.8, 3.7.13 and 3.9.4, 4) ITS 3.6.9 and 3.6.10, because of their operability requirements associated with ITS 3.6.2 and 3.6.3, be reevaluated to determine if they need to be operable "During movement of irradiated fuel assemblies" or during movement of recently irradiated fuel assemblies and 5) that the licensee commits to the guidelines specified in TSTF-51 WOG Insert 0/STS B3.9.4 "Reviewer's Note".

Comment: Comply with this staff position.

### **Entergy (IP2) Response:**

IP2 will incorporate NUREG-1431 requirements that are applicable only during movement of "recently irradiated fuel" except for requirements for Fuel Storage Building Ventilation which were relocated as justified in the SER for IP2 Amendment 229, dated June 11, 2002. This change is being adopted in anticipation of changes to the requirement in CTS 3.8.B.4 (i.e., delay movement of irradiated fuel for 100 hours after reactor shutdown) that is being relocated to the UFSAR by Relocated Item R.24.

IP2 did not incorporate requirements that are applicable only 'during movement of recently irradiated fuel' because the IP2 definition of 'recently' is 100 hours based on the Safety Evaluation Report to Amendment No. 211, July 27, 2000, which addressed 10 CFR 50.67, Accident Source Term.

### **Entergy (IP2) Action:**

IP2 revised the Applicability section of ITS B3.6.1 Bases, to explain that containment is required during fuel movement of "recently" irradiated fuel.

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## 3.6.1 : Containment

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.1 - 5</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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### **NRC Request for Additional Information (RAI):**

JFD DB.1  
ITS B3.6.1 Bases - Applicable Safety Analyses and SR 3.6.1.1  
ITS 5.5.14  
STS B3.L.1 Bases - Applicable Safety Analyses and SR 3.6.1.1

STS B3.6.1 Bases - Applicable Safety Analysis and SR 3.6.1.1 are modified by Inserts B3.6.1-2-02 and B3.6.1-4-01 respectively. Inserts B3.6.1-2-02 and B3.6.1-4-01 use the exact same words and imply that the as left leakage prior to entering a MODE where containment integrity is required shall not exceed 0.75 La is for the Type A, B, and C tests. This is not in accordance with ITS 5.5.14 or the staff Safety Evaluation implementing 10 CFR 50 Appendix J Option B (Amendment 190 dated April 10, 1997) which specifies that the 0.75 La only applies to the Type A tests. The discussion also needs to address the Type B and C leakage rates.

Comment: Revise the ITS markup to reflect the correct leakage rates for the Type A, B, and C tests.

### **Entergy (IP2) Response:**

Agree. The following sentence in the Safety Analysis and SR Bases for ITS 3.6.1 will be changed from the following:

"Prior to entering a MODE where containment integrity is required, the as left leakage rate shall not exceed 0.75 La." to the more clear statement: "Prior to entering a MODE where containment integrity is required, the as left leakage rate must meet the acceptance criteria in Technical Specification 5.5.14.d."

### **Entergy (IP2) Action:**

IP2 will clarify the Safety Analysis and SR Bases for ITS 3.6.1 as described above.

## 3.6.1 : Containment

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.1 - 6</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

### NRC Request for Additional Information (RAI):

CTS 3.6.A.3  
ITS 3.6.1 Action A

See Comment Number 3.6.2-4

Comment: See Comment Number 3.6.2-4

Comment Number 3.6.2-4 states the following:

DOC M.2  
DOC M.4  
DOC M.6  
CTS 3.6.A.3  
ITS 3.6.1 ACTION A  
ITS 3.6.2 RA A.1, B.1, C.2 and associated Bases

CTS 3.6.A.3 is modified by the addition of ITS 3.6.2 RA A.1, B.1 and C.2 which requires that an air lock door is verified closed within 1 hour. This change is characterized as a More Restrictive change (DOC M.2) since CTS 3.6.A.3 would require this be done within 4 hours. DOC M.2 states the following under "Justification for Change": "This action must be completed within 1 hour. This specified time period is consistent with the Actions of LCO 3.6.1 which requires containment be restored to Operable status within 1 hour." ITS 3.6.1 ACTION A requires the containment be restored to OPERABLE status within 4 hours consistent with CTS 3.6.A.3. DOC M.4 states the following in "Description of Change": "CTS 3.6.A.3 specifies that... containment integrity shall be restored within 4 hours. Under the same conditions, ITS 3.6.2 Required Actions A.1 and B.1 maintain this requirement (See ITS 3.6.2 DOCs M.1 and M.2)...".

Comment: Correct this discrepancy by providing additional discussions and justifications for this change if it is considered a More Restrictive change (one hour Completion Time), if it is considered an Administrative change (maintains a 4 hour Completion Time or modify the Completion Time for ITS 3.6.1 ACTION A to 1 hour (a More Restrictive change). Revise the CTS/ITS accordingly. See Comment Number 3.6.1.6.

### Entergy (IP2) Response:

See response to RAI 3.6.2-4. IP2 will revise the Completion Times for LCO 3.6.2, Required Actions A.1, B.1, C.2 and associated Bases to 4 hours to maintain consistency with ITS LCO 3.6.1, Required Action A.1 and CTS 3.6.A.3.

### Entergy (IP2) Action:

None Required for LCO 3.6.1.

### 3.6.1 : Containment

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.1 - 7</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

#### **NRC Request for Additional Information (RAI):**

CTS 4.4.A.2  
ITS 5.5.14.c  
ITS B3.6.1 Bases - Applicable Safety Analyses

See Comment Number 5.5.14-2.

Comment: See Comment Number 5.5.14-2.

Comment 5.5.14-2 states the following;

CTS 4.4.A.2  
ITS 5.5.14.c  
ITS B3.6.1 Bases - Applicable Safety Analyses

CTS 4.4.A.2 and ITS B3.6.1 Bases - Applicable Safety Analyses defines La as equal to 0.1 w/o per day of containment steam air atmosphere at 47 psig and 217° (sic) F. ITS 5.5.14.c defines La as 0.1% of containment air weight per day at Pa (47 psig) and 271°F. The word "steam" is dropped from the ITS 5.5.14.c definition but retained in the ITS B3.6.1 Bases - Applicable Safety Analyses definition of La .

Comment: Correct this discrepancy and provide any necessary discussion and justification for the change in definition.

#### **Entergy (IP2) Response:**

IP2 will maintain criteria exactly as specified in CTS 4.4.A.2 (i.e., the word steam will be maintained in the phrase "0.1 w/o per day of containment 'steam' air atmosphere...")

#### **Entergy (IP2) Action:**

None Required for ITS LCO 3.6.1.

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## 3.6.2 : Containment Air Locks

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.2 - 1</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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### **NRC Request for Additional Information (RAI):**

DOC A.1  
CTS 1.7.e, 3.6.A.1.f, 4.4.A.1, 4.4.C, 4.4.D, 4.4.F and 4.4.G  
ITS 5.5.14 and 5.5.15

See Comment Number 3.6.1-1.

Comment: See Comment Number 3.6.1-1.

Comment Number 3.6.1-1 states the following:

DOC A.1  
CTS 1.7.e, 3.6.A.1.f, 4.4.A.1, 4.4.A.2, 4.4.F and 4.4.G  
ITS 5.5.14 and 5.5.15.

The markups of CTS 1.7.e, 3.6.A.1.f, 4.4.A.1, 4.4.A.2, 4.4.F and 4.4.G show that the containment leakage requirements are relocated to ITS 5.5.15. ITS 5.5.15 is the "Battery Monitoring and Maintenance Program". The correct specification should be ITS 5.5.14 "Containment Leakage Rate Testing Program." See Comment Numbers 3.6.2-1, 3.6.3-1, and 3.6.10-3.

Comment: Correct this discrepancy.

### **Entergy (IP2) Response:**

Agree. Reference to ITS 5.5.15 should be to ITS 5.5.14.

### **Entergy (IP2) Action:**

IP2 revised CTS markup to change ITS 5.5.15 to ITS 5.5.14.

## 3.6.2 : Containment Air Locks

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.2 - 2</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

### NRC Request for Additional Information (RAI):

DOC A.8

DOC M.2

CTS 3.6.A.1.d and 3.6.A.3

ITS 3.6.2 Required Actions A.1 and B.1 Note 1 and associated Bases.

CTS 3.6.A.3 is modified by the addition of Required Actions (RA) A.1, and B.1 and associated Note 1 to both Required Actions. These changes are justified by DOCs M.2 and A.8 respectively. RA A.1/B.1 Note 1 directs the operator to enter Condition C if both doors in an air lock are inoperable. Condition C requires immediate action to evaluate the containment leakage rate, verify an airlock door is closed within 1 hour and restore the air lock to OPERABLE status within 24 hours. The corresponding actions in the CTS would be verify containment leakage rate and restore the air lock to OPERABLE status within 4 hours (CTS 3.6.A.3), which would be the same action if one airlock door were inoperable. Thus the addition of RA A.1/B.1 Note 1 is a More Restrictive change since it directs the operator to a More Restriction action and the addition of RA A.1 and B.1 are classified in the CTS markup as More Restrictive changes (DOC M.2).

Comment: Revise the CTS markup and provide a justification and discussion on this More Restrictive change.

### Entergy (IP2) Response:

In response to RAI 3.6.2-4, the Completion Time for Required Action C.1 was changed from 1 hour to 4 hours. With this change, DOC A.8 is properly classified as an administrative change.

The clarification of the intent of ITS LCO 3.6.2 provided by Note 1 to Actions A.1 and B.1 is an administrative change with no impact on safety because CTS does not establish any requirements if only one door or the interlock mechanism is inoperable. DOC A.8 was modified to better explain why the addition of Notes to Required Actions A.1 and B.1 are administrative changes. DOC A.8 will read as follows:

CTS 1.7.c and CTS 3.6.A.d require "At least one door in each personnel air lock is properly closed." Therefore, the Actions for an inoperable air lock, CTS 3.6.A.3, apply only when both doors in an airlock are inoperable (i.e., cannot satisfy the requirement that at least one door is properly closed). ITS LCO 3.6.2 requires that both doors in the airlock are Operable and Condition A was added to establish new requirements if one of the two required doors is inoperable (see DOC M.1). If both airlock doors are inoperable, ITS 3.6.2 maintains requirements equivalent to those in CTS 3.6.A.3. However, the new Actions for one inoperable airlock door (DOC M.1) or inoperable air lock door interlock (see DOC M.6) are not applicable if both airlock doors are inoperable because Actions for one inoperable airlock door or inoperable air lock door interlock may interfere with Actions to promptly restore an airlock door to Operable. Therefore, ITS LCO 3.6.2, Required Actions A.1 (one of the two doors in an air lock not Operable) and B.1 (air lock interlock mechanism inoperable) are modified by Note directing that the Required Actions for one inoperable door or an inoperable interlock are not applicable if both doors in the

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same air lock are inoperable and Condition C is entered.

**Entergy (IP2) Action:**

IP2 modified DOC A.8 as described above.

## 3.6.2 : Containment Air Locks

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.2 - 3</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

### **NRC Request for Additional Information (RAI):**

DOC A.11  
CTS 1.7.c, 3.6.A.1.d and 3.6.A.3  
ITS 3.6.2 ACTION Note 2 and associated Bases

CTS 3.6.A.3 is modified to add ITS 3.6.2 ACTION Note 2 which specifies separate condition entry is allowed for each air lock. This change is characterized as an Administrative change (DOC A.11). DOC A.11 states that the change is considered Administrative since this allowance is consistent with an unstated assumption in the CTS. The wording of CTS 1.7.c, 3.6.A.1.d and 3.6.A.3 does not seem to allow for separate condition entry, and the staff cannot determine how this can be concluded from the CTS. Thus the staff considers this change to be a Less Restrictive (L) change.

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

### **Entergy (IP2) Response:**

IP2 will re-classify the change that specifies "Separate Condition entry" for air locks as a less restrictive change with the following description:  
CTS 1.7.c and CTS 3.6.A.d require "At least one door in each personnel air lock is properly closed." If this requirement is not met for one or both airlocks, CTS 3.6.A.3 requires that containment integrity is restored within 4 hours from the determination that containment integrity was not met (i.e., the time from the determination that the first airlock did not have at least one Operable door).  
Under the same conditions (i.e., both doors in both airlocks inoperable), ITS LCO 3.6.2, Required Action C.1, directs entry into ITS LCO 3.6.1, Required Action A.1, if containment integrity requirements are not met. This would require that containment integrity is restored within 4 hours from the determination that containment integrity was not met (i.e., the time from the determination that the first airlock did not have at least one Operable door). This requirement is identical to CTS 3.6.A.3 despite the fact that Actions for ITS 3.6.2 is modified by Note 2 that specifies: "Separate Condition entry is allowed for each air lock."  
However, Note 2 that specifies: "Separate Condition entry is allowed for each air lock" does affect application of Required Actions A.1 and A.2 when one of the two doors in one or both airlocks are inoperable and Required Actions C.2 and C.3 for closing at least one door in an airlock when both doors are inoperable if containment integrity requirements in ITS LCO 3.6.1 are met. This allowance provides explicit recognition that the ITS is designed to allow completely separate re-entry into any Condition for each air lock addressed by the Condition including separate tracking of Completion Times based on this re-entry.

### **Entergy (IP2) Action:**

IP2 will add DOC L.3 to specify "Separate Condition entry" for air locks as a less restrictive change. DOC A.11 will be marked "Not Used."

## 3.6.2 : Containment Air Locks

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.2 - 4</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

### **NRC Request for Additional Information (RAI):**

DOC M.2  
DOC M.4  
DOC M.6  
CTS 3.6.A.3  
ITS 3.6.1 ACTION A  
ITS 3.6.2 RA A.1, B.1, C.2 and associated Bases

CTS 3.6.A.3 is modified by the addition of ITS 3.6.2 RA A.1, B.1 and C.2 which requires that an air lock door is verified closed within 1 hour. This change is characterized as a More Restrictive change (DOC M.2) since CTS 3.6.A.3 would require this be done within 4 hours. DOC M.2 states the following under "Justification for Change": "This action must be completed within 1 hour. This specified time period is consistent with the Actions of LCO 3.6.1 which requires containment be restored to Operable status within 1 hour." ITS 3.6.1 ACTION A requires the containment be restored to OPERABLE status within 4 hours consistent with CTS 3.6.A.3. DOC M.4 states the following in "Description of Change": "CTS 3.6.A.3 specifies that... containment integrity shall be restored within 4 hours. Under the same conditions, ITS 3.6.2 Required Actions A.1 and B.1 maintain this requirement (See ITS 3.6.2 DOCs M.1 and M.2)...".

Comment: Correct this discrepancy by providing additional discussions and justifications for this change if it is considered a More Restrictive change (one hour Completion Time), if it is considered an Administrative change (maintains a 4 hour Completion Time or modify the Completion Time for ITS 3.6.1 ACTION A to 1 hour (a More Restrictive change). Revise the CTS/ITS accordingly. See Comment Number 3.6.1.6.

### **Entergy (IP2) Response:**

IP2 will revise the Completion Times for Required Actions A.1, B.1, C.2 and associated Bases to 4 hours to maintain consistency with ITS LCO 3.6.1, Required Action A.1 and CTS 3.6.A.3.

### **Entergy (IP2) Action:**

IP2 will revise the Completion Times for Required Actions A.1, B.1, C.2 and associated Bases to 4 hours and revise DOC M.2 accordingly.

## 3.6.2 : Containment Air Locks

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.2 - 5</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

### **NRC Request for Additional Information (RAI):**

JFD CLB

ITS B3.6.2 Bases - Applicable Safety Analyses, LCO, and Applicability

STS B3.6.2 Bases - Applicable Safety Analyses, LCO, and Applicability

STS B3.6.2 Bases - Applicable Safety Analyses, LCO, and Applicability are modified by Inserts B3.6.2-2-01, B3.6.2-2-02 and B3.6.2-2-03 respectively. These Inserts in the ITS markup are designated as JFD CLB changes. The Justification for Differences section ITS 3.6.2 does not contain a JFD CLB discussion and justification. See Comment Numbers 3.6.2-6, 3.6.2-7 and 3.6.2-8 .

Comment: Provide a discussion and justification for these JFD CLB changes. See Comment Numbers 3.6.2-6, 3.6.2-7 and 3.6.2-8.

### **Entergy (IP2) Response:**

Agree. IP2 will add JFD CLB which will state:

NUREG-1431, Rev 2, LCO 3.6.2, Bases, was modified as needed to reflect the IP2 design and current licensing basis. A detailed description of the design, accident analysis assumptions, and Operability requirements are incorporated into the IP2 ITS Bases. These changes maintain the IP2 current licensing basis except as identified and justified in the CTS/ITS discussion of changes.

### **Entergy (IP2) Action:**

IP2 added JFD CLB.

## 3.6.2 : Containment Air Locks

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.2 - 6</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

### NRC Request for Additional Information (RAI):

JFD CLB

ITS B3.6.2 Bases - Applicable Safety Analyses, Applicability, and References

STS B3.6.2 Bases - Applicable Safety Analyses and Applicability

See Comment Number 3.6.0-1.

Comment: See Comment Number 3.6.0-1.

Comment 3.6.0-1 stated the following:

DOC A.3 (Section 3.6.9)

DOC A.4 (Section 3.6.10)

DOC M.1 (Sections 3.8.2, 3.8.5, 3.8.8, and 3.8.10)

DOC L.1 (Sections 3.3.6, 3.3.7, and 3.7.10)

DOC R.27 (CTS 3.8.B.6, CTS 4.5.F, and STS 3.7.13)

DOC R.28 (CTS 3.8.B.8 and STS 3.9.4)

JFD CLB (Sections 3.6.1, 3.6.2, 3.6.3, 3.7.10, and 3.8.5)

JFD DB.1 (Sections 3.3.6, 3.3.7, 3.7.10, and 3.8.2)

JFD X.1 (Sections 3.3.6, 3.3.7, 3.6.9, and 3.6.10)

CTS 3.3.A.1, 3.3.C.1, 3.3.D.1, 3.3.H.1, 3.6.A.1, 3.8.B.6, 3.8.B.8, and 4.5.F

ITS 3.3.6, 3.3.7, 3.6.1, 3.6.2, 3.6.3, 3.6.9, 3.6.10, 3.7.10, 3.8.2, 3.8.5, 3.8.8, 3.8.10 and associated Bases.

STS 3.3.6, 3.3.7, 3.3.8, 3.6.1, 3.6.2, 3.6.3, 3.7.10, 3.7.13, 3.8.2, 3.8.5, 3.8.8, 3.8.10, 3.9.4, and associated Bases

NUREG-1431 "Standard Technical Specifications- Westinghouse Plants" Revision 2 was based on TSTF-51, which allowed various components, systems, and structures to be inoperable during movement of recently irradiated fuel. "Recently irradiated fuel" is defined in the STS/TSTF-51 as irradiated "fuel that has occupied part of a critical reactor core within the previous [X] days" where X days has been determined by analysis that after sufficient radioactive decay has occurred, the offsite doses resulting from a fuel handling accident remain below the Standard Review Plan (SRP) limits (well within 10 CFR 100). A review of ITS 3.3, 3.6, 3.7, 3.8 and 3.9 shows that the STS Rev 2/TSTF-51 changes are inconsistent and unacceptable in most areas. The changes made in ITS 3.8 seem to be in conformance with STS Rev 2/TSTF-51 and thus would be acceptable. However, the changes made in the other ITS Sections specified above are not in conformance and thus are unacceptable. The changes made to ITS 3.3.6, 3.3.7, 3.7.10, and their associated Bases deleted "During movement of recently irradiated fuel assemblies" from the APPLICABILITY and the Bases. The changes made to the Bases for ITS 3.6.1, 3.6.2 and 3.6.3 added paragraphs discussing why these systems, components, structures, and surveillances (ITS SR 3.6.3.7) were not required during MODES 5 and 6. In addition, CTS 3.8.B.6, 3.8.B.8, and 4.5.F were relocated out of the CTS by DOCs R.27 and R.28. The justification used for all of

these changes is that because Indian Point 2 cannot, and has committed to not move irradiated fuel until the reactor has been sub-critical for at least 100 hours, and the analysis used to determine the offsite doses resulting from a fuel handling accident showed that the doses are below SRP limits (well within 10 CFR 100), thus validating the 100 hours, and this analysis was reviewed and found acceptable by the staff in Amendment 211, dated July 27, 2000. It is the staff's position that STS Rev 2/TSTF-51 did not allow or approve the removal of the "During movement of irradiated fuel assemblies" from the APPLICABILITY, it only allowed the addition of the word "recently", where "recently" is defined in the Bases as discussed above. Thus the APPLICABILITIES would either be "During movement of irradiated fuel assemblies" or "During movement of recently irradiated fuel assemblies". The staff and the licensee cannot definitively state that the licensee would not move irradiated fuel prior to 100 hours. Plant conditions may require movement prior to 100 hours, or plant and industry design and operational changes may result in the ability to move irradiated fuel prior to 100 hours. In fact, the staff has received TSTF-51 amendment requests where recently is defined in the range of 24 hours to 3 days. The staff cannot accept technical specifications without some requirement or limitations during movement of irradiated fuel assemblies. Therefore it is the staff's position that STS Rev. 2/TSTF-51 be implemented with no changes that is: 1) The APPLICABILITIES for ITS 3.3.6, 3.3.7, 3.7.10 and their associated Bases be modified to include either "During movement of irradiated fuel assemblies" or "During movement of recently irradiated fuel assemblies;" 2) The Bases discussions in ITS 3.6.1, 3.6.2, and 3.6.3 be revised to require these systems, components, and structures be operable during movement of irradiated fuel assemblies or recently irradiated fuel assemblies in accordance with STS 3.9.4; 3) CTS 3.8.B.6, 3.8.B.8 and 4.5.F be retained in the ITS based on STS 3.3.8, 3.7.13 and 3.9.4, 4) ITS 3.6.9 and 3.6.10, because of their operability requirements associated with ITS 3.6.2 and 3.6.3, be reevaluated to determine if they need to be operable "During movement of irradiated fuel assemblies" or during movement of recently irradiated fuel assemblies and 5) that the licensee commits to the guidelines specified in TSTF-51 WOG Insert 0/STS B3.9.4 "Reviewer's Note".

Comment: Comply with this staff position.

### **Entergy (IP2) Response:**

See Response to RAI 3.6.0-1.

IP2 will incorporate NUREG-1431 requirements that are applicable only during movement of "recently irradiated fuel" except for requirements for Fuel Storage Building Ventilation which were relocated as justified in the SER for IP2 Amendment 229, dated June 11, 2002. This change is being adopted in anticipation of changes to the requirement in CTS 3.8.B.4 (i.e., delay movement of irradiated fuel for 100 hours after reactor shutdown) that is being relocated to the UFSAR by Relocated Item R.24.

IP2 did not incorporate requirements that are applicable only 'during movement of recently irradiated fuel' because the IP2 definition of 'recently' is 100 hours based on the Safety Evaluation Report to Amendment No. 211, July 27, 2000, which addressed 10 CFR 50.67, Accident Source Term.

### **Entergy (IP2) Action:**

IP2 revised the Applicable Safety Analyses and Applicability section of ITS B3.6.1 Bases, to explain that containment is required during fuel movement of "recently" irradiated fuel.

## 3.6.2 : Containment Air Locks

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
3.6.2 - 7	MB4739	8/13/2002	10/6/2002

### NRC Request for Additional Information (RAI):

JFD CLB  
CTS 4.4.C  
ITS B3.6.2 Bases - LCO  
STS B3.6.2 Bases - LCO

STS B3.6.2 Bases - LCO is modified by Insert B3.6.2-2-02 which describes the air lock testing performed when air lock doors are opened when containment integrity is required. Insert B3.6.2-2-02 seems to differ from the requirements specified in CTS 4.4.C, the Safety Evaluation implementing 10 CFR 50 Appendix J Option B (Amendment 190 dated April 10, 1997) and 10 CFR Appendix J.

Comment: Provide a discussion and justification for this difference.

### Entergy (IP2) Response:

CTS 4.4.C.2 states: "Whenever containment integrity is required, verification shall be made of proper repressurization to at least 47 psig of the double-gasket air lock door seal upon closing an air lock door." This is a requirement for air lock testing.

CTS 4.4.C.2 predates CTS Amendment 191 which authorized IP2 to use 10 CFR 50, appendix J, Option B, and could have been deleted when Option B was adopted because the requirement (including the Frequency) are more clearly stated in NEI 94-01, Section 10.2.2.1. In fact, CTS 4.4.C.2 was redundant to the 10 CFR 50, Appendix J, Option A, requirement to set the airlock seals within 3 days of entry or egress.

CTS 4.4.C.2 was in the CTS for the same reason that IP2 put the more detailed explanation with the reference to NEI 94-01 in the LCO section of the Bases for ITS 3.6.2. That is, the requirement to test the seals after opening an air lock door is buried very deep in NEI 94-01 (or previously in Appendix J). Without this reminder in CTS 4.4.C.2 or ITS 3.6.2 Bases, there is a large potential that the requirement would be missed after an unscheduled use of the air lock.

IP2 believes that the ITS insert B3.6.2-2-02 repeats requirements established in documents referenced by CTS 4.4.C.1 and provides a clearer and more detailed statement of the redundant requirement in CTS 4.4.C.2.

### Entergy (IP2) Action:

None required.

## 3.6.2 : Containment Air Locks

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.2 - 8</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

### **NRC Request for Additional Information (RAI):**

JFD CLB  
CTS 4.4.C.2  
ITS B3.6.2 Bases - LCO  
ITS 5.5.14  
STS B3.6.2 Bases - LCO

STS B3.6.2 Bases - LCO is modified by Insert B3.6.2-2-02 which describes the airlock testing performed when air lock doors are opened. CTS 4.4.C.2 also describes the airlock testing performed when airlock doors are opened. The CTS markup shows CTS 4.4.C.2 as being contained in ITS 5.5.14 (See Comment Numbers 3.6.1-1 and 3.6.2-1). This is not entirely correct. This statement is also contained in Insert B3.6.2-2-02, which means this is also a Less Restrictive (LA) change.

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

### **Entergy (IP2) Response:**

CTS 4.4.C is addressed in ITS 5.5.14. CTS 4.4.C.2 is relocated to the Bases of ITS LCO 3.6.2 in DOC LA.2 in ITS 5.5.14.

### **Entergy (IP2) Action:**

None required.

### 3.6.2 : Containment Air Locks

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.2 - 9</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

#### **NRC Request for Additional Information (RAI):**

JFD PA.1

ITS B3.6.2 Bases -C.1, C.2 and C.3

STS B3.6.2 Bases - C.1, C.2 and C.3

The third paragraph, first sentence of STS B3.6.2 Bases C.1, C.2 and C.3 is modified in ITS B3.6.2 Bases C.1, C.2, and C.3 by the addition of "unless Condition C is exited in accordance with LCO 3.0.2 (one door is made OPERABLE)" at the end of the sentence. This addition is not entirely correct. Entry into Condition C may not necessarily be for inoperable airlock doors or interlock mechanism. Returning one inoperable airlock door to Operable status would not allow one to exit Condition C per LCO 3.0.2 since the ITS LCO 3.6.2 "Two containment airlocks shall be OPERABLE" with both airlock doors Operable will not be met. In addition, RA C.3 requires that the airlock be restored to Operable status, not just one airlock door. Furthermore, this addition is unnecessary since ITS LCO 3.0.2 is valid throughout the ITS and there is no need to specify it here.

Comment: Delete this addition.

#### **Entergy (IP2) Response:**

IP2 will revise the statement to read ""unless Condition C is exited (e.g., one door is made OPERABLE)."  
IP2 disagrees that Required Action C.3, "Restore airlock to Operable," must be completed before Condition C is not applicable anymore. Specification 1.3, Completion Times, states: "An ACTIONS Condition remains in effect and the Required Actions apply until the Condition no longer exists or the unit is not within the LCO Applicability."

Condition C would be entered only when both doors in an air lock are inoperable. Based on Technical Specification 1.3, if one of the airlocks is restored to Operable when in Condition C, Condition C would no longer apply and the plant would be in Condition A only.

#### **Entergy (IP2) Action:**

IP2 will revise the statement to read ""unless Condition C is exited (e.g., one door is made OPERABLE)."

### **3.6.3 : Containment Isolation Valves**

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 1</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

#### **NRC Request for Additional Information (RAI):**

DOC A.1  
CTS 1.7.e, 3.6.A.1.f, 4.4.A.1, 4.4.D.2.a,  
ITS 5.5.14 and 5.5.15

See Comment Number 3.6.1-1.

Comment: See Comment Number 3.6.1-1.

Comment Number 3.6.1-1 states the following:

DOC A.1  
CTS 1.7.e, 3.6.A.1.f, 4.4.A.1, 4.4.A.2, 4.4.F and 4.4.G  
ITS 5.5.14 and 5.5.15.

The markups of CTS 1.7.e, 3.6.A.1.f, 4.4.A.1, 4.4.A.2, 4.4.F and 4.4.G show that the containment leakage requirements are relocated to ITS 5.5.15. ITS 5.5.15 is the "Battery Monitoring and Maintenance Program". The correct specification should be ITS 5.5.14 "Containment Leakage Rate Testing Program." See Comment Numbers 3.6.2-1, 3.6.3-1, and 3.6.10-3.

Comment: Correct this discrepancy.

#### **Entergy (IP2) Response:**

Agree. Reference to ITS 5.5.15 should be to ITS 5.5.14.

#### **Entergy (IP2) Action:**

IP2 revised CTS markup to change ITS 5.5.15 to ITS 5.5.14.

### 3.6.3 : Containment Isolation Valves

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
3.6.3 - 2	MB4739	8/13/2002	10/6/2002

#### **NRC Request for Additional Information (RAI):**

DOC A.11  
DOC M.2  
CTS 3.0.1  
CTS 3.6.A.3.a  
ITS 3.6.3 Required Action B.1, ACTION E and associated Bases

CTS3.6.A.3.a is modified by the addition ITS 3.6.3 RA B.1. This change is justified by DOCs A.11 and M.2. DOC M.2 describes the change with respect to the pressure relief line isolation valves, but also discusses penetrations with two containment isolation valves inoperable. DOC A.11 also discusses penetrations with two inoperable containment isolation valves. The discussions state that with two or more inoperable containment isolation valves the CTS defaults to CTS 3.0.1 which is equivalent to ITS 3.6.3 RA B.1 and ACTION E; i.e., the reactor must be in hot shutdown (MODE 3) within 7 hours and cold shutdown (MODE 5) within 37 hours. Thus this portion of the change is Administrative. This is incorrect. The change is a More Restrictive change. Granted the time to reach hot shutdown (MODE 3) in the CTS and ITS is the same 7 hours. However, in ITS RA B.1, the operator has one (1) hour to isolate the penetration or shutdown. In the CTS there is no requirement to isolate the penetration; in this situation (2 or more inoperable valves); isolation could occur at any time up to 6 hours and 59 minutes after discovery.

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

#### **Entergy (IP2) Response:**

IP2 will change DOC A.11 to become DOC M.10 with the clarification that this is a more restrictive change because it changes a CTS 3.0.1 requirement that the reactor must be in hot shutdown (i.e., Mode 3) within the next 7 hours and cold shutdown (i.e., Mode 5) within 37 hours unless the containment penetration is isolated in the interim to an ITS requirement to isolate the penetration within 1 hour or the reactor must be in Mode 3 within the next 6 hours (7 hours from discovery) and Mode 5 within 36 hours (37 hours from discovery) unless the containment penetration is isolated in the interim.

#### **Entergy (IP2) Action:**

IP2 marked DOC A.11 as not used and created DOC M.10 as described above.

### 3.6.3 : Containment Isolation Valves

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 3</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

#### **NRC Request for Additional Information (RAI):**

DOC M.4

DOC L.3

CTS 3.6.A.1.a and 3.6.A.2.b

ITS 3.6.3 ACTION Note 1, SR 3.6.3.1, SR 3.6.3.7 and associated Bases

CTS 3.6.A.1.a is modified to become ITS 3.6.3 ACTION Note 1, which allows containment isolation valves except for the 36 inch purge valve to be un-isolated intermittently under administrative controls. The changes are justified by DOCs M.4 and L.3. ITS 3.6.3 Action Note 1 conflicts with CTS 3.6.A.2.b and ITS SR 3.6.3.1, SR 3.6.3.7 and the associated Bases which allows or implies that the 36 inch purge valves can be opened intermittently. See Comment Numbers 3.6.3-4, 3.6.3-5, 3.6.3-7 and 3.6.3-8.

Comment: Correct the discrepancy. See Comment Numbers 3.6.3-4, 3.6.3-5, 3.6.3-7 and 3.6.3-8.

#### **Entergy (IP2) Response:**

The 36 inch purge valves are normally closed (as required by CTS 3.6.A.2.b) but, because the valves have automatic operators and will close within 3 seconds (see CTS 3.6.A.2.a), these valves may be opened for 'safety related reasons' as allowed by CTS 3.6.A.2.b and ITS SR 3.6.3.1 (See DOC L.5).

However, if the automatic operator on a 36 inch purge valve is not operable (i.e., won't close the valve in 3 seconds), the 36 inch purge valve should not be opened for any reason. Therefore, the Actions Note for LCO 3.6.3 excludes the 36 inch valves from an allowance that would otherwise allow an inoperable 36 inch purge valve to be opened under administrative controls. IP2 does not believe there are any conflicts in the ITS.

However, DOC L.3 and M.4 need to be clarified. LCO 3.6.3, DOC L.3, expands allowance in CTS 3.6.A.1.a permitting manual containment isolation valves to be opened to include manual valves used to substitute for inoperable automatic isolation valves and eliminates the limitation that valves may be open only as long as necessary to perform the intended function. LCO 3.6.3, DOC L.3, needs to be revised to state that it "expands allowance in CTS 3.6.A.1.a permitting manual containment isolation valves to be opened to include manual valves used to substitute for inoperable automatic isolation valves 'and automatic valves that are closed as part of a Required Action'." Additionally, LCO 3.6.3, DOC L.3, needs to be revised to clarify that the allowance provided by the Actions Note for LCO 3.6.3 excludes the 36 inch valves.

#### **Entergy (IP2) Action:**

IP2 will revise LCO 3.6.3, DOC L.3, to state that it "expands allowance in CTS 3.6.A.1.a permitting manual containment isolation valves to be opened to include manual valves used to substitute for inoperable automatic isolation valves 'and automatic valves that are closed as part of a Required Action'." Additionally, LCO 3.6.3, DOC L.3, will be revised to clarify that the allowance provided by the Actions Note for LCO 3.6.3 excludes the 36 inch valves.

### 3.6.3 : Containment Isolation Valves

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 4</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

#### **NRC Request for Additional Information (RAI):**

DOC M.4  
DOC L.3  
JFD PA.1  
CTS 3.6.A.1.a  
ITS 3.6.3 ACTION Note 1 and associated Bases  
STS 3.6.3 ACTION Note 1 and associated Bases

CTS 3.6.A.1.a and STS 3.6.3 ACTION Note 1 are modified to become ITS 3.6.3 ACTION Note 1, which allows containment isolation valves except for the 36 inch purge valves to be un-isolated intermittently under administrative controls. See Comment Number 3.6.3-3. The changes are justified by DOCs M.4 and L.3 and JFD PA.1. The STS Bases discussion for STS 3.6.3 Action Note 1 is modified by an Insert. STS page B3.6.3-4 shows that the insert is Insert B3.6.3-4-02, but the NUREG-1431 Markup Insert page does not show an insert B3.6.3-4-02. It does show two inserts labeled "Insert B3.6.3-4-01". It is assumed that the second Insert B3.6.3-4-01 on this page is Insert B3.6.3-4-02. See Comment Numbers 3.6.3-5, and 3.6.3.6.

Comment: Correct this discrepancy. See Comment Numbers 3.6.3-3, and 3.6.3-5, and 3.6.3-6.

#### **Entergy (IP2) Response:**

Agree. Insert B 3.6.3 - 4 - 02 is mislabeled as B 3.6.3 - 4 - 01.

#### **Entergy (IP2) Action:**

IP2 changed the label of the second insert from B 3.6.3 - 4 - 01 to B 3.6.3 - 4 - 02.

### 3.6.3 : Containment Isolation Valves

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 5</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

#### **NRC Request for Additional Information (RAI):**

DOC M.4  
DOC L.3  
JFD PA.1  
CTS 3.6.A.1.a  
ITS 3.6.3 ACTION Note 1 and associated Bases  
STS 3.6.3 ACTION Note 1 and associated Bases

CTS 3.6.A.1.a and STS 3.6.3 ACTION Note 1 are modified to become ITS 3.6.3 ACTION Note 1 which allows containment isolation valves except for the 36 inch purge valves to be un-isolated under administrative controls. See Comment Number 3.6.3-3. The changes are justified by DOCs M.4 and L.3 and JFD PA.1. The STS Bases discussion for STS 3.6.3 ACTION Note 1 is modified by Insert B3.6.3-4-01/B3.6.3-4-02 (See Comment Number 3.6.3-4), which states that "This allowance applies to both containment isolation valves that are normally closed and inoperable automatic isolation valves that are closed to meet Required Actions of this LCO". This statement conflicts with the requirements of CTS 3.6.A.1.a, is too restrictive and does not meet the intent of the Note. The Note allows any containment isolation valve (manual, automatic, deactivated automatic, etc.) that is closed as a result of the Action statements or that is normally closed during plant operation to be opened intermittently. The insert would limit the valves that could be opened to only those normally closed during plant operation and inoperable automatic valves closed as a result of the Action statements. Any manual valve, check valve with the flow through the valve secured or blind flange closed due to meet the Action statements would not be allowed to be opened. See Comment Number 3.6.3-6.

Comment: Delete this statement. See Comment Numbers 3.6.3-3, 3.6.3-4 and 3.6.3-6.

#### **Entergy (IP2) Response:**

IP2 will delete clarification provided by Insert B 3.6.3 - 4 -02 that states ""This allowance applies to both containment isolation valves that are normally closed and inoperable automatic isolation valves that are closed to meet Required Actions of this LCO".

#### **Entergy (IP2) Action:**

IP2 will delete clarification provided by Insert B 3.6.3 - 4 -02.

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### 3.6.3 : Containment Isolation Valves

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 6</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

DOC M.4  
DOC L.3  
JFD PA.1  
CTS 3.6.A.1.a  
ITS 3.6.3 ACTION Note 1 and associated Bases  
STS 3.6.3 ACTION Note 1 and associated Bases

CTS 3.6.A.1.a and STS 3.6.3 ACTION Note 1 are modified to become ITS 3.6.3 Action Note 1 which allows containment isolation valves except for the 36 inch purge valves to be un-isolated under administrative controls. See Comment Number 3.6.3-3. The changes are justified by DOCs M.4 and L.3 and JFD PA.1. DOC M.4 states that the IP2 Bases provides additional clarification as to when a dedicated operator is needed and his location with respect to control room operation of a valve. Insert B3.6.3-5-01 in the Bases provides this explanation; however the insert is in the wrong place. It has been inserted between the ITS Bases discussion of ITS 3.6.3 Action Note 2 and Note 3. It should be placed with the discussion for Note 1.

Comment: Revise the ITS Base markup to correct this error. See Comment Number 3.6.3-3.

#### **Entergy (IP2) Response:**

Agree.

#### **Entergy (IP2) Action:**

IP2 renumbered Insert B 3.5.6 - 5 - 01 as B 3.5.6 - 4 - 03 and revised the markup of NUREG-1431 to show this clarification modifying Note 1.

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### 3.6.3 : Containment Isolation Valves

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 7</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

DOC M.7  
JFD CLB  
CTS 3.6.A.2.b  
ITS SR 3.6.3.1 and associated Bases  
STS SR 3.6.3.1 and associated Bases

CTS 3.6.A.2.b and STS SR3.6.3.1 are modified to become ITS SR 3.6.3.1 which verifies that the 36 inch containment purge valves are sealed closed except for specific reasons. This change is justified by DOC M.7. ITS SR 3.6.3.1 maintains the STS requirement that the purge valves be "sealed closed". However, the STS Bases discussion on why the purge valves need to be sealed closed in STS B3.6.3 Bases - Applicable Safety Analyses and LCO is deleted. The intent of the STS requirement of sealing closed the valve is to ensure that the valve will not be opened for any reason during operation since they may be unable to close during or following a LOCA. Since CTS 3.6.A.2.b and ITS SR 3.6.3.1 allow these valves to be opened for specific reasons, there is no need or CTS requirement to seal the valves closed. See Comment Number 3.6.3-3.

Comment: Revise the ITS markup to delete the word "sealed".

#### **Entergy (IP2) Response:**

Agree.

#### **Entergy (IP2) Action:**

IP2 revised SR 3.6.3.1, the associated Bases and DOC M.7 to eliminate requirements that the containment purge valves are "sealed" closed.

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### 3.6.3 : Containment Isolation Valves

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 8</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

DOC M.7  
JFD CLB  
CTS 3.6.A.2.a and 3.6.A.2.b  
ITS SR 3.6.1, SR 3.6.3.2, SR 3.6.3.7 and associated Bases  
STS SR 3.6.3.1 and associated Bases

CTS 3.6.A.2.b and STS SR 3.6.3.1 are modified to become ITS SR 3.6.3.1 which verifies that the 36 inch containment purge valves are sealed closed except for specific reasons. This change is justified by DOC M.7. ITS SR 3.6.3.1 maintains the STS requirement that the purge valve be "sealed closed". However, the STS Bases discussion on why the purge valves need to be sealed closed in STS B3.6.3 Bases - Applicable Safety Analyses and LCO is deleted. See Comment Number 3.6.3-7. Part of the STS B3.6.3 Bases -LCO discussion deals with blocking the valves from fully opening so they can automatically close on an actuation signal. This discussion defines what constitutes an OPERABLE purge valve. Since the 36 inch containment purge valves and the containment pressure relief isolation valves are allowed to be opened during plant operation (CTS 3.6.A.2.b, ITS 3.6.3 ACTION Note 1, ITS SR 3.6.3.1 and ITS SR 3.6.3.2), are blocked from fully opening (CTS 3.6.A.2.a and ITS SR 3.6.3.7) and are automatic valves (CTS 3.6.A. 2.b and ITS Bases discussions) , the sentences in STS B3.6.3 Bases - LCO dealing with blocking the valves and automatic actuation of the blocked cannot be deleted.

Comment: Revise the ITS markup to include this information.

#### **Entergy (IP2) Response:**

Agree.

#### **Entergy (IP2) Action:**

IP2 revised LCO section of ITS 3.6.3 Bases to include "The 36 inch purge valves must have blocks installed to prevent full opening. Blocked purge valves actuate on an automatic signal."

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### 3.6.3 : Containment Isolation Valves

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 9</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

DOC M.9  
DOC LA.3  
CTS 3.6.A.2.a and Table 4.1-3  
ITS SR 3.6.3.5, SR 3.6.3.7 and associated Bases

CTS Table 4.1-3 is modified by the addition of ITS SR 3.6.3.5 which verifies the isolation time of containment isolation valves. This change is justified by DOC M.9. DOC M.9 discusses the isolation times for the containment purge valves and pressure relief isolation valves and refers the reviewer to DOC LA.3 for additional information. DOC LA.3 relocates the isolation times for these valves specified in CTS 3.6.A.2.a to the UFSAR. All these changes are acceptable; however, DOC LA.3 states that the ITS SR that verifies valve isolation time is ITS SR 3.6.3.7 rather than ITS SR 3.6.3.5.

Comment: Correct this discrepancy.

#### **Entergy (IP2) Response:**

Agree

#### **Entergy (IP2) Action:**

IP2 revised DOC LA.3 to reference SR 3.6.3.5 instead of SR 3.6.3.7.

### 3.6.3 : Containment Isolation Valves

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 10</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

#### **NRC Request for Additional Information (RAI):**

DOC L.4  
CTS 4.4.E  
ITS SR 3.0.1

The CTS markup shows that CTS 4.4.E as being deleted, and justifies the deletion by DOC L.4. DOC L.4 states that the requirements of CTS 4.4.E are redundant to the requirements of ITS SR 3.0.1 and thus the requirements of CTS 4.4.E are maintained in the ITS. This justification justifies an Administrative change - relocation of CTS requirements to another ITS section.

Comment: Revise the CTS markup and DOC L.4 to show that this change is an Administrative change rather than a Less Restrictive (L) change.

#### **Entergy (IP2) Response:**

Agree

#### **Entergy (IP2) Action:**

IP2 re-classified this change as Administrative by adding DOC A.13 and marked DOC L.4 as not used. Markups changed accordingly.

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### **3.6.3 : Containment Isolation Valves**

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 11</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

DOC L.6  
CTS 3.6.A.4 and 4.4.D.3

The CTS markup of CTS 3.6.A.4 and 4.4.D.3 shows that these requirements are deleted and are justified by DOC L.6. DOC L.6 only addresses the deletion of CTS 4.4.D.3.

Comment: Provide a discussion and justification for the deletion of CTS 3.6.A.4.

#### **Entergy (IP2) Response:**

CTS Amendment 223 deleted both CTS 3.6.A.4 and 4.4.D.3. Therefore, DOC L.6 is no longer required.

#### **Entergy (IP2) Action:**

IP2 incorporated CTS Amendment 223 into Revision 1 of the package of ITS 3.6.3 and revised DOC L.6 to show that it was superceded by Amendment 223.

### **3.6.3 : Containment Isolation Valves**

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 12</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

#### **NRC Request for Additional Information (RAI):**

DOC LA.2  
CTS 1.7.a and 3.6.A.1.a  
ITS SR 3.6.3.3, SR 3.6.3.4 and associated Bases

The CTS markup of CTS 1.7.a and 3.6.A.1.a shows that these requirements - manual valves required to be closed during operation are closed and blind flanges installed where required - as encompassed by ITS LCO 3.6.3 requirement that containment isolation valves shall be Operable and the details of what constitutes Operability for the non-automatic valves is relocated to the Bases of ITS 3.6.3, and justified by DOC LA.2. This justification is incomplete and misleading. Both CTS 1.7.a and 3.6.A.1.a are the basis for ITS SR 3.6.3.3 and SR 3.6.3.4 which makes this portion of the change an Administrative change. In addition, this information is also relocated to ITS B3.6.1 Bases - Background (See Comment Number 3.6.1-2).

Comment: Revise the CTS markup and provide the appropriate discussions and justifications for these Administrative and Less Restrictive (LA) changes. See Comment Number 3.6.1-2.

#### **Entergy (IP2) Response:**

IP2 deleted DOC LA.2 because CTS 1.7.a and CTS 3.6.A.1.a are retained in the ITS as SR 3.6.3.3 and SR 3.6.3.4.

IP2 revised markup of CTS 1.7.a and CTS 3.6.A.1.a to reference SR 3.6.3.3 and SR 3.6.3.4 and DOC M.8. Additionally, DOC M.8 was revised to clarify that "CTS 1.7.a and CTS 3.6.A.1.a require that "All non-automatic containment isolation valves which are not required to be open during accident conditions are closed and blind flanges installed where required." However, CTS 3.6.A and CTS 4.4 do not include any requirements for the periodic verification that manual isolation valves and blind flanges are positioned or installed as required.

ITS SR 3.6.3.3 and ITS SR 3.6.3.4 are added to require periodic verification that isolation valves and blind flanges not locked, sealed or otherwise secured are positioned or installed as required."

#### **Entergy (IP2) Action:**

IP2 marked DOC LA.2 as not used and revised markup of CTS 1.7.a and CTS 3.6.A.1.a to reference SR 3.6.3.3 and SR 3.6.3.4 and DOC M.8. Additionally, DOC M.8 was revised as described above.

### 3.6.3 : Containment Isolation Valves

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 13</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

#### **NRC Request for Additional Information (RAI):**

DOC LA.3

CTS 3.6.A.3.a.2.(b) and associated Note 3)

CTS 3.6.A.3.a.2.(b) specifies that with one or more inoperable containment isolation valves one of the remedial actions is to isolate the affected penetration within 4 hours using at least one deactivated automatic isolation valve secured in the isolation position. This requirement is supplemented by associated Note 3) which states that "This may be the valve previously maintained operable per 3.a.I above or the valve initially declared inoperable." The CTS markup shows the Note being relocated and justified by DOC LA.3. DOC LA.3 only discusses the relocation of the closing times for the containment purge isolation valves and pressure relief isolation valves. See Comment Number 3.6.3-14.

Comment: Provide a discussion and justification for this Less Restrictive (L/LA) change. See Comment Number 3.6.3-14.

#### **Entergy (IP2) Response:**

Agree. Footnote 3) on CTS Page 3.6-2 should have been deleted as an administrative change. Marked Footnote 3) on CTS Page 3.6-2 as deleted by Administrative change A.14 and added DOC A.14 which states:

When an automatic containment isolation valve is inoperable and not restored within the specified Completion Time, CTS 3.6.A.1.b requires that the affected penetration is isolated by use of at least one deactivated automatic isolation valve secured in the isolation position, or CTS 3.6.A.1.c requires that a containment isolation valve is in the closed position or isolated by a closed manual valve or flange. Footnote 3) to CTS 3.6.A.1.b and CTS 3.6.A.1.c states that the valve used to isolate a containment penetration with an inoperable isolation valve "may be the valve previously maintained operable per 3.a.1 above or the valve initially declared inoperable."

Under the same conditions (one containment isolation valve inoperable in a penetration with two or more isolation valves), ITS LCO 3.6.3, Required Actions A.1, B.1 and C.1 require that the affected penetration flow path is isolated by use of at least one closed and de-activated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured. Therefore, the clarification provided by Footnote 3) to CTS 3.6.A.1.b and CTS 3.6.A.1.c is deleted because the options it provides fall within the options provided by ITS LCO 3.6.3, Required Actions A.1, B.1 and C.1 which include use of both the inboard and outboard containment isolation valve to isolate a containment penetration.

#### **Entergy (IP2) Action:**

IP2 added DOC A.14 as described above.

### 3.6.3 : Containment Isolation Valves

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 14</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

#### **NRC Request for Additional Information (RAI):**

DOC LA .3

DOC LA .4

CTS 1.7.d, 3.6.A.1.b, 3.6.A.3.a.2.(b) and associated Note 3), and 3.6.A.3.a.2.(d)

ITS B3.6.3 Bases - A.1 and A.2, B.1, and C.1 and C.2.

STS B3.6.3 Bases - A.1 and A.2, B.1, and C.1 and C.2

CTS 1.7.d, 3.6.A.1.b, 3.6.A.3.a.2.(b) and associated Note 3), and 3.6.A.3.a.2.(d) specify that manual valves, blind flanges and automatic valves used to isolate automatic containment isolation valve penetrations shall meet the same design criteria as the penetration isolation valve. In the CTS markup this requirement in CTS 1.7.d, 3.6.A.1.b and 3.6.A.3.a.2.(d) is being relocated per DOC LA.4 to the Bases for ITS 3.6.3. The ITS Bases markup for ITS 3.6.3 shows that this requirement has been relocated to ITS B3.6.3 Bases - A.1 and A.2 and B.1. This requirement is not included in the ITS markup for ITS B3.6.3 Bases - C.1 and C.2. The STS does not specify or require that the valves used to isolate inoperable containment penetrations meet the same design criteria as the containment isolation valves. The ITS maintains the CTS requirement in ITS 3.6.3 ACTIONS A and B, but tries to take advantage of the less restrictive STS requirement in ITS 3.6.3 ACTION C. This Less Restrictive (L) change for ITS 3.6.3 Action C has not been justified. The staff recommends that the less restrictive STS requirement be applied to ITS 3.6.3 ACTIONS A, B, and C. See Comment Number 3.6.3-13.

Comment: Revise the CTS/ITS markups to be consistent and provide the appropriate discussions and justification to either maintain the Less Restrictive (LA) CTS requirement or use the Less Restrictive (L) STS requirement. See Comment Number 3.6.3-13.

#### **Entergy (IP2) Response:**

As stated in DOC LA.4, CTS 1.7.d, CTS 3.6.A.1.b and CTS 3.6.A.3.a.2(c) all specify that isolation devices used to isolate containment penetrations with inoperable containment isolation valves must be isolated with devices that "meet the same design criteria as the isolation valve." Although this requirement is not explicitly stated in the NUREG-1431 Bases, it is an implied requirement in that the device used to isolate the penetration will have the same pressure rating as the original device and/or using another device does not negate the need to meet type C leakage limits, etc. IP2 believes retaining this clarification in the Bases is helpful.

#### **Entergy (IP2) Action:**

IP2 revised the Bases for ITS 3.6.3, Required Action C.1, to specify that the affected penetration must be isolated "using a device with the same design criteria as the affected isolation valves."

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### 3.6.3 : Containment Isolation Valves

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 15</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

#### **NRC Request for Additional Information (RAI):**

DOC R.16

CTS 4.4.D.2.b

Indian Point 3 ITS 3.6.3 ACTION D, SR 3.6.3.10 and associated Bases  
NUREG - 1433/1434 STS 3.6.1.3 ACTION D, SR 3.6.1.3.14 (NUREG-1433),  
SR 3.6.1.3.11 (NUREG - 1434) and associated Bases.

See Comment Numbers 3.6.3-22 and 4.4.D.2.b-1 (RAI 3.6.3 - 25).

Comment: See Comment Numbers 3.6.3-22 and 4.4.D.2.b

Comment Number 3.6.3-22 states the following:

ITS 3.6.3 ACTION D, SR 3.6.3.8 and associated Bases

ITS B3.6.3 Bases - LCO

STS B3.6.3 Bases - LCO

The fourth paragraph of STS 3.6.3 Bases - LCO states the following: "Purge valves with resilient seals [secondary containment bypass valves] must meet additional leakage rate requirements. The other containment isolation valve leakage rates are addressed by LCO 3.6.1 "Containment," as Type C testing". This paragraph has been deleted from ITS B3.6.3 Bases - LCO. Since ITS changes to the STS Bases were made based on changes to the STS, on plant specific system design, on current licensing basis as specified in the CTS or for editorial reasons, the deletion, except for the purge valve portion, does not seem to fall into any of these categories. This paragraph discusses the reason for the specific STS/ITS leakage SRs in STS/ITS 3.6.3 and specifies which specification controls the leakage requirements - STS/ITS 3.6.3 for specific leakage criteria and STS/ITS for Type C testing. Since ITS 3.6.3 includes ACTION D, SR 3.6.3.8 and additional leakage SRs required by Comment Numbers 3.6.3-15, 3.6.3-19 and 4.4.D.2.b-1 (RAI 3.6.3 - 25), this STS paragraph modified to take into account the plant special design needs to be retained. See Comment Number 3.6.3-24 for concerns on ITS SR 3.6.3.8.

Comment: Revise the ITS markup to retain this STS paragraph as modified by the plant specific design. See Comment Numbers 3.6.3-15, 3.6.3-19, 3.6.3-24, and 4.4.D.2.b-1 (RAI 3.6.3 - 25).

Comment Number 4.4.D.2.b-1 (RAI 3.6.3 - 25) states the following:

DOC R.16

CTS 4.4.D.2.b

Indian Point 3 ITS 3.6.3 ACTION D, SR 3.6.3.10 and associated Bases  
NUREG - 1433/1434 STS 3.6.1.3 ACTION D, SR 3.6.1.3.14 (NUREG 1433),  
SR 3.6.1.3.11(NUREG-1434) and associated Bases

CTS 4.4.D.2.b specifies the surveillance and acceptance criteria for the service water isolation valve leakage system. The CTS markup indicates by DOC R.16 that these requirements are to be relocated to the UFSAR and TRM. The staff has reviewed the justification provided in DOC R.16, as well as the Safety Evaluation (SE) issued with Amendment No.190 dated April 10, 1997. The staff concludes, based on the Amendment No. 190 SE that CTS 4.4.D.2.b cannot be relocated out of the ITS since it is considered part of the Containment Leakage Rate Test Program. The staff find that CTS 4.4.D.2.b must be retained in ITS 3.6.3 and 5.5.14, however, specific details (i.e., pressures and leakage rates) may be relocated to the appropriate ITS Bases or the Containment Leakage Rate Testing Program, depending on how similar SRs are addressed in the STS NUREGs. See Indian Point Unit 3 ITS 3.6.3 ACTION D and SR 3.6.3.10 or NUREGs 1433 or 1434 - BWR 4/6 STS for how to incorporate this requirement into the IP2 ITS. See Comment Number 3.6.3-22. In addition, DOC R.16 deals with the relocation of the requirements of the City Water System not the Service Water System and does not specifically address CTS 4.4.D.2.b.

Comment: Revise the CTS and ITS markups and provide the appropriate discussions and justifications for the retention of the specification. See Comment Number 3.6.3-22.

**Entergy (IP2) Response:**

Response to RAI 3.6.3-22:

IP2 revised LCO section of LCO 3.6.3 Bases to include the following statement:

"The containment isolation valve leakage rate must be within the limits of Technical Specification 5.5.14, "Containment Leakage Rate Testing Program" unless the leakage rate is governed by Technical Specification 3.6.9, "Isolation Valve Seal Water (IVSW) System," or Technical Specification 3.6.10, "Weld Channel and Penetration Pressurization System (WC&PPS)."

Response to RAI 3.6.3-25:

IP2 ITS 5.5.14 will be revised to include requirements in IP2 ITS 5.5.14.e for service water leakage into containment similar to the IP3 ITS 5.5.15.d.

**Entergy (IP2) Action:**

As described in the Response to RAIs 3.6.3-22 and 3.6.3-25.

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### **3.6.3 : Containment Isolation Valves**

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 16</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

JFD CLB

ITS B3.6.3 Bases - Applicable Safety Analyses and Applicability

STS B3.6.3 Bases - Applicable Safety Analyses and Applicability

STS B3.6.3 Bases - Applicable Safety Analyses and Applicability are modified by Inserts B3.6.3-3-01 and B3.6.3-4-01, respectively. These inserts in the ITS markup are designated as JFD CLB changes. The Justification for Differences Section for ITS 3.6.2 (sic) does not contain a JFD CLB discussion and justification. See Comment Number 3.6.3-17.

Comment: Provide a discussion and justification for these JFD CLB changes. See Comment Number 3.6.3-17.

#### **Entergy (IP2) Response:**

Inserts B 3.6.3-3-01 and B 3.6.3-4-01 state conclusions from and include a reference to "Safety Evaluation by the Office of Nuclear Reactor Regulation Related to Amendment No. 211 to Facility Operating License No. DPR-26, July 27, 2000. IP2 does not believe it is necessary to write a JD for a Bases change that references a recently issued SER.

#### **Entergy (IP2) Action:**

None

### 3.6.3 : Containment Isolation Valves

NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 17</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

#### **NRC Request for Additional Information (RAI):**

JFD CLB

ITS B3.6.3 Bases - Applicable Safety Analyses, Applicability, SR 3.6.3.7 and References

STS B3.3.3 Bases - Applicable Safety Analyses, Applicability, and SR 3.6.3.7.

See Comment Number 3.6.0-1.

Comment: See Comment Number 3.6.0-1.

Comment 3.6.0-1 stated the following:

DOC A.3 (Section 3.6.9)

DOC A.4 (Section 3.6.10)

DOC M.1 (Sections 3.8.2, 3.8.5, 3.8.8, and 3.8.10)

DOC L.1 (Sections 3.3.6, 3.3.7, and 3.7.10)

DOC R.27 (CTS 3.8.B.6, CTS 4.5.F, and STS 3.7.13)

DOC R.28 (CTS 3.8.B.8 and STS 3.9.4)

JFD CLB (Sections 3.6.1, 3.6.2, 3.6.3, 3.7.10, and 3.8.5)

JFD DB.1 (Sections 3.3.6, 3.3.7, 3.7.10, and 3.8.2)

JFD X.1 (Sections 3.3.6, 3.3.7, 3.6.9, and 3.6.10)

CTS 3.3.A.1, 3.3.C.1, 3.3.D.1, 3.3.H.1, 3.6.A.1, 3.8.B.6, 3.8.B.8, and 4.5.F

ITS 3.3.6, 3.3.7, 3.6.1, 3.6.2, 3.6.3, 3.6.9, 3.6.10, 3.7.10, 3.8.2, 3.8.5, 3.8.8, 3.8.10 and associated Bases.

STS 3.3.6, 3.3.7, 3.3.8, 3.6.1, 3.6.2, 3.6.3, 3.7.10, 3.7.13, 3.8.2, 3.8.5, 3.8.8, 3.8.10, 3.9.4, and associated Bases

NUREG-1431 "Standard Technical Specifications- Westinghouse Plants" Revision 2 was based on TSTF-51, which allowed various components, systems, and structures to be inoperable during movement of recently irradiated fuel. "Recently irradiated fuel" is defined in the STS/TSTF-51 as irradiated "fuel that has occupied part of a critical reactor core within the previous [X] days" where X days has been determined by analysis that after sufficient radioactive decay has occurred, the offsite doses resulting from a fuel handling accident remain below the Standard Review Plan (SRP) limits (well within 10 CFR 100). A review of ITS 3.3, 3.6, 3.7, 3.8 and 3.9 shows that the STS Rev 2/TSTF-51 changes are inconsistent and unacceptable in most areas. The changes made in ITS 3.8 seem to be in conformance with STS Rev 2/TSTF-51 and thus would be acceptable. However, the changes made in the other ITS Sections specified above are not in conformance and thus are unacceptable. The changes made to ITS 3.3.6, 3.3.7, 3.7.10, and their associated Bases deleted "During movement of recently irradiated fuel assemblies" from the APPLICABILITY and the Bases. The changes made to the Bases for ITS 3.6.1, 3.6.2 and 3.6.3 added paragraphs discussing why these systems, components, structures, and surveillances (ITS SR 3.6.3.7) were not required during MODES 5 and 6. In addition, CTS 3.8.B.6, 3.8.B.8, and 4.5.F were relocated out of the CTS by DOCs R.27 and R.28. The justification used for all of

these changes is that because Indian Point 2 cannot, and has committed to not move irradiated fuel until the reactor has been sub-critical for at least 100 hours, and the analysis used to determine the offsite doses resulting from a fuel handling accident showed that the doses are below SRP limits (well within 10 CFR 100), thus validating the 100 hours, and this analysis was reviewed and found acceptable by the staff in Amendment 211, dated July 27, 2000. It is the staff's position that STS Rev 2/TSTF-51 did not allow or approve the removal of the "During movement of irradiated fuel assemblies" from the APPLICABILITY, it only allowed the addition of the word "recently", where "recently" is defined in the Bases as discussed above. Thus the APPLICABILITIES would either be "During movement of irradiated fuel assemblies" or "During movement of recently irradiated fuel assemblies". The staff and the licensee cannot definitively state that the licensee would not move irradiated fuel prior to 100 hours. Plant conditions may require movement prior to 100 hours, or plant and industry design and operational changes may result in the ability to move irradiated fuel prior to 100 hours. In fact, the staff has received TSTF-51 amendment requests where recently is defined in the range of 24 hours to 3 days. The staff cannot accept technical specifications without some requirement or limitations during movement of irradiated fuel assemblies. Therefore it is the staff's position that STS Rev. 2/TSTF-51 be implemented with no changes that is: 1) The APPLICABILITIES for ITS 3.3.6, 3.3.7, 3.7.10 and their associated Bases be modified to include either "During movement of irradiated fuel assemblies" or "During movement of recently irradiated fuel assemblies;" 2) The Bases discussions in ITS 3.6.1, 3.6.2, and 3.6.3 be revised to require these systems, components, and structures be operable during movement of irradiated fuel assemblies or recently irradiated fuel assemblies in accordance with STS 3.9.4; 3) CTS 3.8.B.6, 3.8.B.8 and 4.5.F be retained in the ITS based on STS 3.3.8, 3.7.13 and 3.9.4, 4) ITS 3.6.9 and 3.6.10, because of their operability requirements associated with ITS 3.6.2 and 3.6.3, be reevaluated to determine if they need to be operable "During movement of irradiated fuel assemblies" or during movement of recently irradiated fuel assemblies and 5) that the licensee commits to the guidelines specified in TSTF-51 WOG Insert 0/STS B3.9.4 "Reviewer's Note".

Comment: Comply with this staff position.

### **Entergy (IP2) Response:**

IP2 will incorporate NUREG-1431 requirements that are applicable only during movement of "recently irradiated fuel" except for requirements for Fuel Storage Building Ventilation which were relocated as justified in the SER for IP2 Amendment 229, dated June 11, 2002. This change is being adopted in anticipation of changes to the requirement in CTS 3.8.B.4 (i.e., delay movement of irradiated fuel for 100 hours after reactor shutdown) that is being relocated to the UFSAR by Relocated Item R.24.

IP2 did not incorporate requirements that are applicable only 'during movement of recently irradiated fuel' because the IP2 definition of 'recently' is 100 hours based on the Safety Evaluation Report to Amendment No. 211, July 27, 2000, which addressed 10 CFR 50.67, Accident Source Term.

### **Entergy (IP2) Action:**

IP2 revised the Applicable Safety Analyses and Applicability section of ITS B3.6.3 Bases, to explain that containment is required during fuel movement of "recently" irradiated fuel.

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### 3.6.3 : Containment Isolation Valves

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 18</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

JFD PA.1

ITS B3.6.3 Bases - Applicable Safety Analyses

STS B3.6.3 Bases - Applicable Safety Analyses

STS B3.6.3 Bases - Applicable Safety Analyses is modified by INSERT B 3.6-3-02 (sic) which defines the term sealed closed valves and sealed closed barriers. While the staff does not seem to have a problem with the definition of sealed closed valves, sealed closed barriers is not a normally defined term from the staff's point of view, is confusing and does not meet the intent of valve and penetration isolation. In particular, the statement that "closed automatic valves which remain closed after a loss of coolant accident" is unacceptable. The ITS requires that closed automatic valves used for penetration isolation be deactivated. In addition, normally closed automatic containment isolation valves are also deactivated. The sealed barrier definition would allow closed activated automatic valves. In addition, the statement "Sealed closed barriers may be used in place of any automatic isolation valve" does not connote leak tightness. There may be penetrations normally isolated by sealed closed barriers that are required to be leak tight. This is not discussed.

Comment: Delete this change.

#### **Entergy (IP2) Response:**

Insert B 3.6-3-01, which defines the term sealed closed, is a verbatim statement of the definition of "sealed" found in Standard Review Plan 6.2.4. However, IP2 will delete the first paragraph for Insert B 3.6-3-01 because, after further consideration, IP2 believes that the definition of "sealed" can be inferred from the following excerpt from the Bases of Required Action A.2: "Note 2 applies to isolation devices that are locked, sealed, or otherwise secured in position and allows these devices to be verified closed by use of administrative means. Allowing verification by administrative means is considered acceptable, since the function of locking, Containment Isolation Valves sealing, or securing components is to ensure that these devices are not inadvertently repositioned. Therefore, the probability of misalignment of these devices once they have been verified to be in the proper position, is small."

#### **Entergy (IP2) Action:**

None

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### 3.6.3 : Containment Isolation Valves

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 19</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

CTS 4.4.D.2.b and Table 4.4-1 Notes 5 and 6

CTS 4.4.D.2.b specifies the surveillance and criteria for the service water isolation valve leakage system. Table 4.4-1 Note 6 indicates which containment isolation valves are sealed by the service water isolation valve leakage system. See Comment Numbers 3.6.3-15 and 4.4.D.2.b-1 (RAI 3.6.3 - 25) for retention of this surveillance. Table 4.4-1 Note 5 indicates that certain containment isolation valves in the Residual Heat Removal (RHR) System are sealed by the RHR system fluid. It seems logical that the SR required by Comment Number 4.4.D.2.b-1 (RAI 3.6.3 - 25) should also include the hydrostatic leakage tests for the RHR containment isolation valves. See Comment Number 3.6.3-22.

Comment: Revise the CTS/ITS markups and provide the appropriate discussions and justifications to address this concern. See Comment Numbers 3.6.3-15, 3.6.3.22, and 4.4.D.2.b

#### **Entergy (IP2) Response:**

CTS 4.4.D.2.b is not a 10 CFR 50, appendix J, requirement for containment isolation - it is a test of leakage of service water into containment during the one year recovery period following an accident.

RHR water is already flooding the floor of the containment and is being recirculated and cooled by either the RHR system or the recirculation system. If an RHR or Recirculation line containment isolation valve leaks into containment then the total inventory of water on the containment floor is not being increased the way it would be if service water was leaking in.

Just for your information, CTS 4.4.D.2.b requires that "The leakage rate 'into' containment for the isolation valves sealed with the service water system shall not exceed 0.36 gpm per fan cooler." The CTS Bases for this requirement explain that "The maximum permissible inleakage rate from the containment isolation valves sealed with service water for the full 12-month period of post-accident recirculation without flooding the internal recirculation pumps is 0.36 gpm per fan-cooler." More clearly, if a Fan cooler Unit is leaking following an accident then service water to that FCU must be isolated. If the valves used to isolate an FCU leak into containment more than 0.36 gpm, then the post accident recirculation pumps, which are inside containment, will be submerged in less than 12 months.

#### **Entergy (IP2) Action:**

None

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### 3.6.3 : Containment Isolation Valves

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 20</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

CTS Table 4.1-3 Item 5

ITS SR 3.6.3.6 and associated Bases

CTS Table 4.1-3, Item 5 requires the automatic actuation of the Containment Isolation System on a 24 month frequency. The corresponding ITS SR is ITS SR 3.6.3.6. While the CTS phrase "automatic actuation" can be interpreted to mean "an actual or simulated actuation signal", the CTS seems explicit in that all automatic containment isolation valves must be tested. The ITS exempts valves which are locked, sealed or otherwise secured in position. Thus the ITS is less restrictive than the CTS.

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

#### **Entergy (IP2) Response:**

IP2 will add DOC L.7 that justifies exempting valves that are locked, sealed or otherwise secured in position from the requirement to verify that containment isolation valves actuate to the isolation position on an actual or simulated containment isolation signal.

The proposed justification is that containment isolation valves that are locked, sealed or otherwise secured in position fall into one of three categories: a) the valve is locked, sealed or otherwise secured in the closed position and is already filling its containment isolation safety function; or, b) the valve is locked, sealed or otherwise secured in the open position because the other safety function requires that the containment isolation function not occur when the containment isolation function is actuated (e.g., containment spray containment isolation valves - see response to RAI 3.6.6 - 3); or c) the valve is locked, sealed or otherwise secured in the open position and the valve is considered inoperable.

Exempting valves that are secured in the closed position from testing is acceptable because the valves are already fulfilling its design safety function by being closed. Exempting valves that are normally secured in the open position from testing is acceptable because immediate isolation is not essential or is detrimental to the valves fulfilling its design function. For example, the motor operated containment isolation valves for the containment spray system (869 A and 869 B) are normally de-energized in the open position to ensure that a containment isolation signal does not prevent containment spray from fulfilling its design function. These valves are manually closed after spray from the RWST is completed and the inboard containment isolation valve is a check valve that will close automatically after containment spray is terminated. Therefore, these valves would be exempted from SR 3.6.3.6 because the emergency operating procedures assume that these valves are closed manually after containment spray is complete. Exempting valves that are not normally secured in the open position from testing is acceptable if the valve is declared inoperable and the Actions associated with an inoperable containment isolation valve are met.

**Entergy (IP2) Action:**

IP2 marked CTS Table 4.1-3, Item 5, as L.7 and wrote DOC L.7 as described above.

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### 3.6.3 : Containment Isolation Valves

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 21</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

CTS Table 4.4-1  
ITS B3.6.3 Bases - LCO and References  
STS B3.6.3 - Bases - LCO

The third paragraph of STS B3.6.3 Bases - LCO deals with those containment isolation valves that are required to be closed during an accident and are in the closed position during normal operation. The last sentence in this paragraph states that these passive isolation valves/devices are listed in a plant specific document (s). This sentence has been deleted from ITS B3.6.3 Bases - LCO. Since ITS changes to the STS Bases were made based on changes to the STS, on plant specific system design, on current licensing basis as specified in the CTS or for editorial reasons, the deletion does not seem to fall into any of these categories. This statement directs the operator/inspector to those documents which list these passive devices similar to the document that lists the automatic valves. In addition, it would seem that some, if not all of these valves are listed in Table 4.4-1 which is being relocated per DOC LA.1 to the UFSAR. The staff requires that this statement be retained.

Comment: Revise the ITS markup to retain this statement modified to include specific plant documents containing the listing of the passive isolation valves/devices or if the listing of the documents is extensive, a general description of the type of documents.

#### **Entergy (IP2) Response:**

Agree. FSAR Chapter 5 now contains a list of containment isolation valves/devices as a result of Amendment 223 which relocated CTS Tables 3.6-1 and 4.4-1 to the UFSAR. IP2 will retain the following statement in the LCO Section of the Bases for ITS 3.6.3: Containment isolation valves/devices are those listed in Reference 2. (Reference 2 is UFSAR Chapter 5).

#### **Entergy (IP2) Action:**

IP2 will revise the LCO Section of the Bases for ITS 3.6.3 as described above.

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### 3.6.3 : Containment Isolation Valves

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 22</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

ITS 3.6.3 ACTION D, SR 3.6.3.8 and associated Bases  
ITS B3.6.3 Bases - LCO  
STS B3.6.3 Bases - LCO

The fourth paragraph of STS 3.6.3 Bases - LCO states the following: "Purge valves with resilient seals [secondary containment bypass valves] must meet additional leakage rate requirements. The other containment isolation valve leakage rates are addressed by LCO 3.6.1 "Containment," as Type C testing". This paragraph has been deleted from ITS B3.6.3 Bases - LCO. Since ITS changes to the STS Bases were made based on changes to the STS, on plant specific system design, on current licensing basis as specified in the CTS or for editorial reasons, the deletion, except for the purge valve portion, does not seem to fall into any of these categories. This paragraph discusses the reason for the specific STS/ITS leakage SRs in STS/ITS 3.6.3 and specifies which specification controls the leakage requirements - STS/ITS 3.6.3 for specific leakage criteria and STS/ITS for Type C testing. Since ITS 3.6.3 includes ACTION D, SR 3.6.3.8 and additional leakage SRs required by Comment Numbers 3.6.3-15, 3.6.3-19 and 4.4.D.2.b-1 (RAI 3.6.3 - 25), this STS paragraph modified to take into account the plant special design needs to be retained. See Comment Number 3.6.3-24 for concerns on ITS SR 3.6.3.8.

Comment: Revise the ITS markup to retain this STS paragraph as modified by the plant specific design. See Comment Numbers 3.6.3-15, 3.6.3-19, 3.6.3-24, and 4.4.D.2.b-1 (RAI 3.6.3 - 25).

#### **Entergy (IP2) Response:**

Agree. IP2 revised LCO section of LCO 3.6.3 Bases to include the following statement:  
"The containment isolation valve leakage rate must be within the limits of Technical Specification 5.5.14, "Containment Leakage Rate Testing Program" unless the leakage rate is governed by Technical Specification 3.6.9, "Isolation Valve Seal Water (IVSW) System," or Technical Specification 3.6.10, "Weld Channel and Penetration Pressurization System (WC&PPS)."

#### **Entergy (IP2) Action:**

IP2 will implement the changes described above.

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### **3.6.3 : Containment Isolation Valves**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 23</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

ITS B3.6.3 Bases - D.1

ITS B3.6.3 Bases - D.1 has the following statement at the very end: "The 24 hour Completion Time for purge valve leakage... does not exist." Since the ITS does not have a specific purge valve leakage requirement per the SE for Amendment 190 dated April 10, 1997, this statement is not valid for ITS B3.6.3 BASES - D.1.

Comment: Delete this statement.

#### **Entergy (IP2) Response:**

Agree

#### **Entergy (IP2) Action:**

IP2 deleted the last sentence of the Bases for LCO 3.6.3, Condition D.

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### 3.6.3 : Containment Isolation Valves

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 24</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

CTS 4.4.D

ITS 3.6.3 ACTION D, SR 3.6.3.8 and associated Bases

STS 3.6.3 ACTION D, SR 3.6.3.7, SR 3.6.3.11 and associated Bases

NUREG - 1431 STS 3.6.3 ACTION D, SR 3.6.3.7, SR 3.6.3.11 and similar ACTIONS and SRs in the other NUREGS were added to the containment isolation valve specification because certain containment isolation valves had additional leakage rate requirements beyond those specified for 10 CFR 50 Appendix J. These requirements were placed in STS 3.6.3 because it was considered the more appropriate location given that it specified the valves and penetrations, rather than in STS 3.6.1. The ITS markup of STS 3.6.3 ACTION D and SR 3.6.3.11 modifies the wording by substituting "containment" for "shield" and deleting the word "bypass". Similar changes were made throughout the Bases. In Indian Point 3, the corresponding ACTION and SR( ITS 3.6.3. ACTION D and SR 3.6.3.9) did not delete the word "bypass". No justification is provided for the deletion of the word "bypass" or the difference between two virtually similar plants. However, from the CTS markup of CTS 4.4.D, it would seem that ITS SR 3.6.3.8 is an attempt to include the 10 CFR 50 Appendix J, Type B and C leakage rate test as part of ITS 3.6.3. If this is the case, the proposed change causes confusion since it will conflict with STS/ITS 3.6.1, 3.6.3 ACTION Note 4, and 5.5.16/14. In addition, this change would be considered as a generic change which would be a beyond scope of review item for this conversion. If it is indeed a bypass leakage rate surveillance, similar to IP-3, then ITS 3.6.3 ACTION D, SR 3.6.3.8 and the associated Bases need to be revised to reflect this design.

Comment: Revise the CTS/ITS markup as appropriate and provide the appropriate discussions and justifications for this change.

#### **Entergy (IP2) Response:**

Agree

#### **Entergy (IP2) Action:**

Revised 3.6.3 ACTION D and SR 3.6.3.11 and associated Bases to use the term "containment bypass leakage" similar to IP3.

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### 3.6.3 : Containment Isolation Valves

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.3 - 25</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

DOC R.16

CTS 4.4.D.2.b

Indian Point 3 ITS 3.6.3 ACTION D, SR 3.6.3.10 and associated Bases  
NUREG - 1433/1434 STS 3.6.1.3 ACTION D, SR 3.6.1.3.14 (NUREG 1433),  
SR 3.6.1.3.11(NUREG-1434) and associated Bases

CTS 4.4.D.2.b specifies the surveillance and acceptance criteria for the service water isolation valve leakage system. The CTS markup indicates by DOC R.16 that these requirements are to be relocated to the UFSAR and TRM. The staff has reviewed the justification provided in DOC R.16, as well as the Safety Evaluation (SE) issued with Amendment No.190 dated April 10, 1997. The staff concludes, based on the Amendment No. 190 SE that CTS 4.4.D.2.b cannot be relocated out of the ITS since it is considered part of the Containment Leakage Rate Test Program. The staff find that CTS 4.4.D.2.b must be retained in ITS 3.6.3 and 5.5.14, however, specific details (i.e., pressures and leakage rates) may be relocated to the appropriate ITS Bases or the Containment Leakage Rate Testing Program, depending on how similar SRs are addressed in the STS NUREGs. See Indian Point Unit 3 ITS 3.6.3 ACTION D and SR 3.6.3.10 or NUREGs 1433 or 1434 - BWR 4/6 STS for how to incorporate this requirement into the IP2 ITS. See Comment Number 3.6.3-22. In addition, DOC R.16 deals with the relocation of the requirements of the City Water System not the Service Water System and does not specifically address CTS 4.4.D.2.b.

Comment: Revise the CTS and ITS markups and provide the appropriate discussions and justifications for the retention of the specification. See Comment Number 3.6.3-22.

#### **Entergy (IP2) Response:**

IP2 renumbered NRC RAI 4.4.D.2.b-1 as 3.6.3 - 25 to minimize confusion.

IP2 will retain CTS 4.4.D.2.b in the Technical Specifications as described below.

#### **Entergy (IP2) Action:**

IP2 ITS 3.6.3, Condition D, will be revised to match IP3 LCO 3.6.3, Condition D;  
IP2 ITS 3.6.3 will be revised to include IP2 ITS SR 3.6.3.9 which will match IP3 SR 3.6.3.10; and  
IP2 ITS 5.5.14 will be revised to include requirements in IP2 ITS 5.5.14.e for service water leakage into containment similar to the IP3 ITS 5.5.15.d.

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## 3.6.5 : Containment Air Temperature

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.5 - 1</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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### **NRC Request for Additional Information (RAI):**

DOC M.2  
JFD DB.1  
JFD PA.1  
ITS B3.6.5 Bases - SR 3.6.5.1  
STS B3.6.5A Bases - SR 3.6.5A.1

STS B3.6.5A Bases -SR 3.6.5A.1 states the following: "In order to determine the containment average air temperature, an arithmetic average is calculated... atmosphere." ITS B3.6.5 Bases - SR 3.6.5.1 deletes this STS sentence and replaces it with Insert B3.6.5-3-01. DOC M.2 which adds ITS SR 3.6.5.1 to the CTS states that the Bases is modified to "clarify that the containment average air temperature is an arithmetic average that is calculated using measurements taken at locations within the containment...". Insert B3.6.5-3-01 does state that more containment locations may be used to monitor the containment temperature but it does not state that an arithmetic average will be used. The statement implies that any method could be used to determine or calculated the containment average temperature.

Comment: Revise ITS B3.6.5 Bases-SR 3.6.5.1 to be consistent with the statements in DOC M.2.

### **Entergy (IP2) Response:**

IP2 will revise the Bases for SR 3.6.5.1 (Insert 3.6.5 - 3 - 01) to read as follows:

"In order to determine the containment average air temperature, the control room indicator provides an arithmetic average of the air temperature at the inlet of each of the 5 fan cooler units. Portable temperature sensing equipment may also be used to determine containment air temperature."

### **Entergy (IP2) Action:**

IP2 revised the Bases for SR 3.6.5.1 (Insert 3.6.5 - 3 - 01) to read as described above.

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### **3.6.6 : Containment Spray System and Containment Fan Cooler Unit (FCU) System**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.6 - 1</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

DOC M.3  
CTS 3.3.B.2.a and 3.3.B.2.b  
ITS 3.6.6 Required Actions A.1 and C.1 and associated Bases

CTS 3.3.B.2.a and 3.3.B.2.b specify the actions to take during normal reactor operation for an inoperable FCU and containment spray pump, respectively. The CTS markup of CTS 3.3.B.2.b shows that the words "During normal reactor operation" are changes to MODES 1, 2, 3 and 4, and is justified by DOC M.3. No such change is shown or justified in CTS 3.3.B.2.a. Since both CTS actions are converted to the same ITS LCO, the changes should be consistent.

Comment: Revise the CTS markup of CTS 3.3.B.2.a to be consistent with CTS 3.3.B.2.b and provide a discussion and justification for this More Restrictive change.

#### **Entergy (IP2) Response:**

Agree

#### **Entergy (IP2) Action:**

Revised markup of CTS 3.3.B.2.a to match the markup of CTS 3.3.B.2.b that shows that DOC M.1 applies to the phrase "during normal reactor operation." Verified that DOC M.1 supports this change as written.

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### **3.6.6 : Containment Spray System and Containment Fan Cooler Unit (FCU) System**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.6 - 2</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

DOC M.5  
CTS 4.5.B  
ITS SR 3.6.6.1 and associated Bases  
STS SR 3.6.6A.1 and associated Bases

CTS 4.5.B is modified by the addition of ITS SR 3.6.6.1 and justified by DOC M.5. While the addition of ITS SR 3.6.6.1 is acceptable, changes made to the associated Bases are questionable. STS B3.6.6A Bases - SR 3.6.6A.1 states the following: "Rather, it involves verification, through a system walkdown, that those valves outside containment (only check valves are inside containment) and capable of potentially being mispositioned are in the correct position." ITS B3.6.6 Bases - SR 3.6.6.1 modifies this sentence by deleting the words "outside containment (only check valves are inside containment)". No specific justification for this deletion is provided. The proposed change would require that all valves both inside and outside containment be verified to be in the correct position through a system walkdown. Unless the valves inside containment are either check valves (like stated in the STS), are all locked, sealed or secured in position, or a combination of check and locked, sealed or secured valves, a system walkdown inside containment would be required, which would be undesirable.

Comment: Provide a discussion and justification for this change and/or Revise the ITS Bases as necessary.

#### **Entergy (IP2) Response:**

IP2 ITS Bases for SR 3.6.6.1 are correct as written for the IP2 design.

IP2 design for containment spray does not have any valves in the CS spray path that are inside containment (FSAR Figure 6.2-1, Sheets 1 and 2). The containment isolation valves (motor operated valves 869 A and B and check valves 867 A and B) are all located outside containment. This conforms to the 1967 Draft GDC.

NUREG-1431, Bases for SR 3.6.6.1, is based on plants that have one containment isolation valve outside containment and a check valve inside containment as specified in 10 CFR 50, Appendix A, GDC 56.

#### **Entergy (IP2) Action:**

None

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## 3.6.6 : Containment Spray System and Containment Fan Cooler Unit (FCU) System

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.6 - 3</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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### **NRC Request for Additional Information (RAI):**

DOC M.8  
CTS 4.5.B.1  
ITS SR 3.6.6.5, SR 3.6.6.6 and associated Bases

CTS 4.5.B.1 specifies that the Containment Spray System test shall be performed except that the isolation valves in the spray supply lines at the containment are blocked closed. The ITS breaks this CTS surveillance into two surveillances - ITS SR 3.6.6.5 and SR 3.6.6.6. ITS SR 3.6.6.5 verifies that each automatic containment spray valve that is not locked, sealed or otherwise secured in position actuates to its correct position on an actuation signal. It is implied from CTS 4.5.B.1, DOC M.8 and the ITS Bases that these blocked valves are automatic valves, but it is not clear. If they are manual valves there is no problem. However, if these valves are automatic, then there is the concern as to when these valves will be tested per ITS SR 3.6.6.5 since the locked, sealed, and secured exception in the SR could result in the valves never being tested for this SR. The exception from testing of locked, sealed or otherwise secured valve was only intended to apply to those valve that during normal operating conditions are locked, sealer, or otherwise secured in position. It is also implied by DOC M.8 that ITS SR 3.6.6.5 and SR 3.6.6.6 would be performed independent of each other and this may not be the case nor is it required by the ITS.

Comment: Specify whether these blocked valves are manual or automatic. If automatic, discuss when and how this valve will be tested in accordance with ITS SR 3.6.6.5.

### **Entergy (IP2) Response:**

Agree. The motor operated containment isolation valves for the containment spray system (869 A and 869 B) are normally de-energized in the open position and are manually closed after spray from the RWST is completed. Therefore, these valves would be exempted from SR 3.6.6.5 because they are "sealed" open even though these valves get an open signal from any ESFAS signal that initiates CS. The ESFAS signal would open the valve if the valve was energized and in the wrong position. IP2 currently verifies the operation of these valves under CTS 4.5.B.1.

### **Entergy (IP2) Action:**

IP2 will modify SR 3.6.6.5 to add a note that states that SR 3.6.6.5 shall include valves 869 A and 869 B even though the valves are normally de-energized in the open position. Adjusted markup and DOC M.8 for consistency.

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## 3.6.6 : Containment Spray System and Containment Fan Cooler Unit (FCU) System

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.6 - 4</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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### **NRC Request for Additional Information (RAI):**

DOC L.1  
CTS 3.3.B.2  
ITS 3.6.6 ACTIONS, 3.6.7 ACTIONS and associated Bases

CTS 3.3.B.2 specifies that during power operation any one of the following components may be inoperable: One containment spray system, one fan cooler or the re-circulation fluid pH control system. The CTS markup shows this requirement as being modified to allow any combination of the above components to be inoperable in converting to ITS 3.6.6 and 3.6.7 ACTIONS. This change is justified by DOC L.1. DOC L.1 is incorrect. The DOC summary states the following: "Allows the containment spray system or the fan cooler units to be inoperable regardless of the Operability status of the re-circulation pH control system." The rest of the justification elaborates on this sentence. The discussion does not address the CTS inoperability requirement of an inoperable containment spray and an inoperable FCU which the ITS would allow.

Comment: Revise the discussion and justification of this Less Restrictive (L) change to address all the inoperability combinations allowed by the ITS.

### **Entergy (IP2) Response:**

DOC L.1 decouples the restrictions on simultaneous inoperability of two functions: a) recirculation pH control; and b) containment cooling (i.e., containment spray and fan cooler units). Note the DOC summary for DOC L.1: "Allows the containment spray system or the fan cooler units to be inoperable regardless of the Operability status of the recirculation pH control system."

DOC L.3 relaxes requirements for containment cooling (i.e., combinations of containment spray and fan cooler units that may be inoperable at the same time).

IP2 believes that the changes in DOCs L.1 and L.3 are appropriately described and justified.

### **Entergy (IP2) Action:**

Revised markup of CTS 3.3.B.2, first sentence, to show that DOCs L.1 and L.3 both apply to this line.

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### **3.6.6 : Containment Spray System and Containment Fan Cooler Unit (FCU) System**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.6 - 5</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

DOC L.2  
CTS 3.3.B.2  
ITS 3.6.6 Required Action B.2 and associated Bases

CTS 3.3.B.2 requires that after HOT SHUTDOWN (MODE 3) is reached, the action is to restore the inoperable subsystem to OPERABLE status within the next 48 hours or be in COLD SHUTDOWN within the next 30 hours. This requirement is changed in the CTS markup to MODE 5 in 84 hours for the Containment Spray System. This modification is justified by DOC L.2. The corresponding ITS ACTION is ITS 3.6.6 Required Action B.2, which requires the plant to be in MODE 5 within 84 hours. Even though the overall time to complete the CTS and ITS ACTIONS of 84 hours does not change (CTS 6 to MODE 3 + 48 + 30=84 hours), there is a change in converting the CTS to the ITS. This change relates to when the commencement of shutting down to MODE 5 begins or is declared. In the CTS it officially starts immediately after the 48 hour allowed outage time to restore the subsystem to OPERABLE status is completed. In the ITS it being immediately after MODE 3 is reached. This change is not indicated or justified in the CTS markup for CTS 3.3.B.2. The change is a More Restrictive change (Time for commencement of shutdown to MODE 5 is declared earlier in ITS versus CTS).

Comment: Revise the CTS markup and provide the appropriate discussions and justification for this More Restrictive change.

#### **Entergy (IP2) Response:**

Agree

#### **Entergy (IP2) Action:**

IP2 deleted DOC L.2 and added DOC M.10 to address this issue. Markups of CTS and NUREG-1431 revised appropriately.

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## 3.6.6 : Containment Spray System and Containment Fan Cooler Unit (FCU) System

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.6 - 6</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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### **NRC Request for Additional Information (RAI):**

DOC L.3  
CTS 3.3.B.2.a and 3.3.B.2.b  
ITS 3.6.6 ACTIONS and associated Bases

CTS 3.3.B.2.a specifies the Actions to take for an inoperable FCU provided both containment spray trains are OPERABLE. CTS 3.3.B.2.b specifies the actions to take for an inoperable containment spray pump provided the five FCUs and the remaining containment spray pump are OPERABLE. In converting the CTS Actions to ITS 3.6.6 Actions the requirements for containment spray pump and/or FCU OPERABILITY are being deleted. This deletion is justified by DOC L.3. DOC L.3 is incomplete. The justification describes and justifies the deletion associated with CTS 3.3.B.2.a, but not for CTS 3.3.B.2.b.

Comment: Revise DOC L.3 to include a discussion and justification for the deletion associated with CTS 3.3.B.2.b.

### **Entergy (IP2) Response:**

Agree

### **Entergy (IP2) Action:**

IP2 added DOC L.7 to address changes to CTS 3.3.B.2.b which will allow one of the two containment spray pumps to be inoperable for up to 72 hours even when 1 train of fan cooler units (i.e., up to two FCUs powered from the same safeguards power train) is also inoperable if the combination of Operable FCUs and containment spray pumps provide sufficient heat removal capability to maintain the post-accident containment pressure below the design value.

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### **3.6.6 : Containment Spray System and Containment Fan Cooler Unit (FCU) System**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.6 - 7</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

DOC LA.1  
CTS 4.5.D.1  
ITS SR 3.6.6.2 and associated Bases

CTS 4.5.D.2 specifies that the monthly operation of the FCU be initiated from the control room with flow through the unit. The CTS markup indicates that the requirements for FCV initiation from the control room and flow through the unit is being relocated. This change is justified by DOC LA.1. DOC LA.1 states that this information is being relocated to ITS 3.6.6 Bases. The staff cannot find this information in the Bases for ITS 3.6.6.

Comment: Revise ITS 3.6.6 Bases to include this information.

#### **Entergy (IP2) Response:**

Agree

#### **Entergy (IP2) Action:**

IP2 revised Bases for SR 3.6.6.2 to state that fans are started from the control room.

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### **3.6.6 : Containment Spray System and Containment Fan Cooler Unit (FCU) System**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.6 - 8</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

JFD PA.1  
ITS 3.6.6 and associated Bases

The Justification for Differences Section for ITS 3.6.6 provides a JFD PA.1 and an associated discussion. The ITS markup does not show a JFD PA.1 and the discussion refers to consistency with the intent of ITS 3.8.9, which has nothing to do with this LCO.

Comment: Correct this discrepancy.

#### **Entergy (IP2) Response:**

Agree

#### **Entergy (IP2) Action:**

IP2 corrected typo in JFD PA.1 and revised mark-up of NUREG-1431 to reference this JD.

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### **3.6.6 : Containment Spray System and Containment Fan Cooler Unit (FCU) System**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.6 - 9</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

CTS 4.5.D.2  
ITS SR 3.6.6.9 and associated Bases

CTS 4.5.D.2 and ITS SR 3.6.6.9 verify the air flow rate for the FCUs. In CTS 4.5.D.2 the frequency for this SR is "once every refueling interval (#)." The CTS markup shows this as changing to 24 months. No justification is provided for this Administrative change as was done for similar changes in other ITS 3.6. sections.

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

#### **Entergy (IP2) Response:**

Agree

#### **Entergy (IP2) Action:**

Added DOC A.8 to that clarify that CTS Frequency of "once every refueling interval(#)" is equivalent to once every 24 months as specified in CTS Table 1-1.

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### **3.6.6 : Containment Spray System and Containment Fan Cooler Unit (FCU) System**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.6 - 10</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

ITS 3.6.6 ACTIONS C and D, SR 3.6.6.2, SR 3.6.6.3, SR 3.6.6.7 and associated Bases  
STS 3.6.6.A ACTIONS C and D, SR 3.6.6A.2, SR 3.6.6A.3, SR 3.6.6.A.7, and associated Bases

STS 3.6.6A ACTIONS C and D, SR 3.6.6A.2, SR 3.6.6.A.3, SR 3.6.6.A.7, and their associated Bases specify the actions to be taken when the required containment cooling train is inoperable and the surveillances to be performed on the required containment cooling trains. ITS 3.6.6 ACTIONS C and D, SR 3.6.6.2, SR 3.6.6.3, SR 3.6.6.7 and their associated Bases deletes the word "required" except in the Bases discussion for ITS 3.6.6 Action C.

Comment: Correct this discrepancy.

#### **Entergy (IP2) Response:**

Agree

#### **Entergy (IP2) Action:**

IP2 deleted the word "required" from the first line of the Bases for LCO 3.6.6, Condition C.

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### 3.6.7 : Recirculation Fluid pH Control System

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.7 - 1</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

DOC L.2  
CTS 3.3.B.2  
ITS 3.6.7 Required Action B.2 and associated Bases

CTS 3.3.B.2 requires that after Hot Shutdown (MODE 3) is reached, the action is to restore the inoperable subsystem to OPERABLE status within the next 48 hours or be in Cold Shutdown within the next 30 hours. This requirement is changed in the CTS markup to MODE 5 in 84 hours. This modification is justified by DOC L.2. The corresponding ITS Action is ITS 3.6.7 Required Action B.2, which requires the plant to be in MODE 5 within 84 hours. Even though the overall time to complete the CTS and ITS Actions of 84 hours does not change (CTS 6 to MODE 3 + 48 + 30 = 84 hours), there is a change in converting the CTS to the ITS. This change relates to when the commencement of shutting down to MODE 5 begins or is declared. In the CTS it officially starts immediately after the 48 hour allowed outage time to restore the subsystem to OPERABLE status is completed. In the ITS it is immediately after MODE 3 is reached. This change is not indicated or justified in the CTS markup for CTS 3.3.B.2. The change is a More Restrictive change (Time for commencement of shutdown to MODE 5 declared earlier in ITS versus CTS).

Comment: Revise the CTS markup and provide the appropriate discussions and justifications for this More Restrictive change.

#### **Entergy (IP2) Response:**

Agree. DOCs will be revised so that ITS change is an explicit statement of the existing requirements.

#### **Entergy (IP2) Action:**

IP2 revised LCO 3.6.7, DOC M.2, revised to address both Required Action B.1 and B.2. LCO 3.6.7, DOC L.2, marked not used.

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### **3.6.7 : Recirculation Fluid pH Control System**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.7 - 2</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

JFD CLB  
JFD DB.1  
ITS SR 3.6.7.1 and associated Bases  
STS SR 3.6.7.1 and associated Bases

STS SR 3.6.7.1 and its associated Bases are modified by Inserts 3.6.7-1-01 and B3.6.7-4-01, respectively. These Inserts in the ITS markup are designated as JFD CLB changes. The Justification for Differences Section for ITS 3.6.7 does not contain a JFD CLB discussion and justification.

Comment: Provide a discussion and justification for this JFD CLB change.

#### **Entergy (IP2) Response:**

Agree

#### **Entergy (IP2) Action:**

IP2 add JFD CLB for ITS 3.6.7 which states that ITS SR 3.6.7.1 requirements are revised to maintain current licensing bases.

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### **3.6.7 : Recirculation Fluid pH Control System**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.7 - 3</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

JFD DB.1  
ITS B3.6.6 Bases - Background  
ITS B3.6.7 Bases - A.1  
STS B3.6.7 Bases - A.1

STS B3.6.7 Bases - A.1 contains the following sentence: "The Containment Spray System would still be available... in the event of a DBA." ITS B3.6.7 Bases - A.1 modifies this sentence by deleting "Containment Spray System" and replacing it with "Recirculation pH control system." Since ITS 3.6.7 Condition A is the action for an inoperable Recirculation pH Control System, the sentence does not make sense because the system is inoperable. The sentence in the STS justifies the 72 hour Completion Time based on an alternate means of iodine removal- the Containment Spray System. This changes does not provide an adequate justification for the 72 hour Completion Time. ITS B3.6.6 Bases- Background states that the Containment Spray System is used to reduce fission products including iodine from the containment atmosphere during a DBA. Based on this, the staff believes that the STS words are correct for justifying the 72 hour Completion Time at IP2.

Comment: Revise the ITS markup to reflect the STS words.

#### **Entergy (IP2) Response:**

Agree.

#### **Entergy (IP2) Action:**

Revised Bases for LCO 3.6.7 to read "The Containment Spray System would still be available... in the event of a DBA."

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### **3.6.7 : Recirculation Fluid pH Control System**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.7 - 4</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

JFD PA.1  
ITS 3.6.7 and associated Bases

The Justification for Differences Section for ITS 3.6.7 provides a JFD PA.1 and an associated discussion. The ITS markup does not show a JFD PA.1 and the discussion refers to consistency with the intent of ITS LCO 3.8.9, which has nothing to do with this LCO.

Comment: Correct this discrepancy.

#### **Entergy (IP2) Response:**

Agree

#### **Entergy (IP2) Action:**

Revised markup to show JFD PA.1 and corrected typo in JFD PA.1.

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## 3.6.8 : Hydrogen Recombiners

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.8 - 1</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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### **NRC Request for Additional Information (RAI):**

DOC A.3  
CTS 3.0.1  
CTS 3.3.G.2  
ITS LCO 3.0.4  
ITS 3.6.8 RA A.1 Note and associated Bases

CTS 3.3.G.2 is modified by the addition of ITS 3.6.8 RA A.1 Note. This change is justified by DOC A.3. DOC A.3 states that the CTS does not have a requirement equivalent to ITS LCO 3.0.4 which would prevent entry into a higher MODE when a system is inoperable, and thus it does not change existing requirements. This is incorrect. The staff believes that CTS 3.0.1 and 3.3.G.2 would not allow MODE changes with inoperable hydrogen recombiners, other than shutting down. Furthermore, it would not be the prudent and safe action to take with inoperable equipment. The staff believes the change is a Less Restrictive (L) change since it allows MODE changes.

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

### **Entergy (IP2) Response:**

IP2 agrees that the Applicability for CTS 3.3.G, "The reactor should not be made critical unless., make the Note that states "LCO 3.0.4 is not Applicable" a less restrictive change because the new Note would allow entry into Mode 1 with one hydrogen recombiner inoperable.

### **Entergy (IP2) Action:**

DOC A.3 will be changed to an L DOC.

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## 3.6.8 : Hydrogen Recombiners

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.8 - 2</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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### **NRC Request for Additional Information (RAI):**

DOC A.4  
JFD DB.1  
CTS Table 1-1  
CTS 4.5.C.2  
ITS SR 3.6.8.2 and associated Bases

CTS 4.5.C.2 states that "A sample plate from each PAR shall be removed at each refueling outage and tested...". The CTS markup modifies CTS 4.5.C.2 by changing "each refueling outage" to "24 months". This change is justified by DOC A.4. This is incorrect. The term "each refueling outage" does not have a qualifier associated with it (i.e., # or ##). Thus, by CTS Table 1-1 "each refueling outage" would be associated with a frequency of 18 months rather than 24 months which is associated with the qualifiers - # and ##. Thus the change is a Less Restrictive (L) change rather than an Administrative change. In addition, this change is considered a beyond scope of review item for this conversion.

Comment: Delete this change.

### **Entergy (IP2) Response:**

Agree

### **Entergy (IP2) Action:**

IP2 ITS SR 3.6.8.2, Verify the required response of a sample plate from each hydrogen recombiner to a test mixture of hydrogen gas, will be revised to have a Frequency of 18 months.

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## 3.6.8 : Hydrogen Recombiners

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.8 - 3</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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### **NRC Request for Additional Information (RAI):**

JFD DB.1

JFD PA.1

ITS B3.6.8 Bases - Applicable Safety Analyses and Applicability

STS B3.6.8 Bases - Applicable Safety Analyses and Applicability

STS B3.6.8 Bases - Applicable Safety Analyses and Applicability are modified by changing hydrogen concentration of 4.1 v/o to 4.0 v/o. This change is justified by JFDs DB.1 and PA.1. JFD DB.1 justifies changes to the STS surveillance based on current licensing bases and has nothing to do with hydrogen concentration. JFD PA.1 discussed editorial changes with regards to consistency with the intent of ITS LCO 3.8.9 which has nothing to do with hydrogen recombiners or hydrogen concentration.

Comment: Provide a discussion and justification for this change.

### **Entergy (IP2) Response:**

Agree.

### **Entergy (IP2) Action:**

Corrected typo in JFD 3.6.8, DB.1.

Added JFD 3.6.8, CLB, and changed JFD reference on Bases page 3.6.8-1 of NUREG-1431 from DB.1 and PA.1 to CLB.

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## 3.6.9 : Isolation Valve Seal Water (IVSW) System

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.9 - 1</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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### **NRC Request for Additional Information (RAI):**

DOC A.3  
DOC A.4  
DOC A.4 (ITS 3.6.10)  
DOC A.5 (ITS 3.6.10)  
DOC M.1  
DOC M.4  
DOC M.5 (ITS 3.6.10)  
DOC M.6 (ITS 3.6.10)  
CTS 3.3.C.3 and 3.3.D.3  
ITS 3.6.9 ACTION C, 3.6.10 ACTION C and associated Bases

CTS 3.3.C.3 specifies the actions to be taken if the IVSW system is not restored to OPERABLE status within the time period specified in CTS 3.3.C.2. CTS 3.3.D.3 specifies the Actions to be taken if the Weld Channel and Penetration Pressurization System (WC & PPS) is not returned to OPERABLE status within the time period specified in CTS 3.3.D.2. Both CTS 3.3.C.3 and 3.3.D.3 use the exact same words and in converting from the CTS to the ITS end up with the same ITS shutdown Action - ITS 3.6.9 ACTION C for CTS 3.3.C.3 and ITS 3.6.10 ACTION C for CTS 3.3.D.3. However, the CTS markup for both CTS 3.3.C.3 and 3.3.D.3 is different when they should be the same. The CTS markup shows that CTS 3.3.C.3.a is changed by DOCs A.3, A.4 and M.4 and CTS 3.3.C.3.b and c are changed by DOCs A.3 and M.1; while CTS 3.3.D.3.a is changed by DOCs A.5 and M.6 and CTS 3.3.D.3.b and c are changed by DOCs M.5 and M.6. A review of the DOCs shows that DOCs A.4 and A.5 (ITS 3.6.10) should be the same justification, DOCs M.4 and M.6 (ITS 3.6.10) should be the same, and DOCs M.1 and M.5 (ITS 3.6.10) should be the same. Yet the discussions and justifications are not identical and lack some of the discussions and justifications that are found in the corresponding DOCs. In addition, the markup of CTS 3.3.C.3.b and c needs to show a DOC M.4 similar to the DOC M.6 (ITS 3.6.10) in the CTS markup of CTS 3.3.D.3.b and c, and the markup of CTS 3.3.D.3.a, b, and c needs to show a DOC A.4 (ITS 3.6.10) similar to DOC A.3 in the CTS markup of CTS 3.3.C.3.a,b and c.

Comment: Revise the CTS markups of CTS 3.3.C.3 and CTS 3.3.D.3 to be consistent and revise or provide the appropriate discussions and justification associated with the Administrative and More Restrictive changes made to these specifications.

### **Entergy (IP2) Response:**

IP2 agrees that the markups and discussions of change for CTS 3.3.C.3 for ITS 3.6.9 and CTS 3.3.D.3 for ITS 3.6.10 should be the same.

IP2 will revise the markups and DOCS for CTS 3.3.C.3 for ITS 3.6.9 and CTS 3.3.D.3 for ITS 3.6.10 as follows:

ITS 3.6.9, DOC A.4 and ITS 3.6.10, DOC A.5, will revise to provide parallel discussions;  
ITS 3.6.9, DOC M.1 and ITS 3.6.10, DOC M.6, will revise to provide parallel discussions;

ITS 3.6.9, DOC M.4 and ITS 3.6.10, DOC M.5, will revise to provide parallel discussions and the reference to DOC M.6 on CTS 3.3.D.2.b and c for ITS 3.6.10 was deleted; and CTS 3.3.D.3.a and CTS 3.3.D.3.b and c for ITS 3.6.10 will revise to reference DOC A.4.

**Entergy (IP2) Action:**

IP2 revised the markups and DOCS for CTS 3.3.C.3 for ITS 3.6.9 and CTS 3.3.D.3 for ITS 3.6.10 as follows:

ITS 3.6.9, DOC A.4 and ITS 3.6.10, DOC A.5, were revised to provide parallel discussions; ITS 3.6.9, DOC M.1 and ITS 3.6.10, DOC M.6, were revised to provide parallel discussions; ITS 3.6.9, DOC M.4 and ITS 3.6.10, DOC M.5, were revised to provide parallel discussions and the reference to DOC M.6 on CTS 3.3.D.2.b and c for ITS 3.6.10 was deleted; and CTS 3.3.D.3.a and CTS 3.3.D.3.b and c for ITS 3.6.10 were revised to reference DOC A.4.

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### **3.6.9 : Isolation Valve Seal Water (IVSW) System**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.9 - 2</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

DOC M.3

ITS SR 3.6.9.2 and associated Bases

DOC M.3 adds ITS SRs 3.6.9.2, 3.6.9.4 and 3.6.9.5. ITS SR 3.6.9.2 has a frequency of 24 hours while ITS SRs 3.6.9.4 and 3.6.9.5 have a frequency of 24 months. The discussion in the DOC summary for DOC M.3 states that the frequency for all SRs is 24 months.

Comment: Correct this discrepancy.

#### **Entergy (IP2) Response:**

IP2 will revise DOC summary for DOC M.3 to read: "Adds requirements for verification that IVSW nitrogen bank pressure is above a specified minimum required every 24 hours, valve actuation time is within required limits every 24 months, and that each automatic valve in the IVSW System actuates to the correct position on an actual or simulated actuation signal every 24 months."

#### **Entergy (IP2) Action:**

IP2 will revise DOC summary for DOC M.3 as described above.

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### **3.6.9 : Isolation Valve Seal Water (IVSW) System**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.9 - 3</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

JFD X.1  
ITS 3.6.9 and associated Bases

The Justification for Differences in ITS 3.6.9 shows a JFD X.1. The ITS markup of ITS 3.6.9 and its associated Bases does not show a JFD X.1.

Comment: Correct this discrepancy.

#### **Entergy (IP2) Response:**

IP2 agrees that JFD X.1 is not marked on the Specification or Bases for ITS 3.6.9.

#### **Entergy (IP2) Action:**

IP2 Plant specific Specification and Bases for ITS 3.6.9 marked to show JFD X.1.

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## 3.6.9 : Isolation Valve Seal Water (IVSW) System

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
3.6.9 - 4	MB4739	8/13/2002	10/6/2002

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### NRC Request for Additional Information (RAI):

CTS 3.3.C.2.b

ITS 3.6.9 Condition A and associated Bases

CTS 3.3.c.2.b specifies that any valve required for the functioning of the IVSW system may be inoperable provided that all valves in the system that provide a duplicate function are OPERABLE. The corresponding ITS condition is the second part of ITS 3.6.9 Condition A, which allows one IVSW automatic actuation valve to be inoperable in one or both headers. The ITS Condition is not in conformance with the CTS which only allows one valve header to be inoperable, the wording is confusing (one valve inoperable but both headers may be inoperable) and is different from the approved version for the similar system in Indian Point 3 ITS 3.6.9.

Comment: Delete the change that adds "one or both headers" to ITS 3.6.9 Condition A.

### Entergy (IP2) Response:

IP2 ITS 3.6.9, Condition A, maintains requirements identical to CTS 3.3.C.2.a and CTS 3.3.C.2.b. IP3 ITS LCO 3.6.9, Condition A, is unnecessarily restrictive by not allowing one automatic actuation valve in both pairs to be inoperable at the same time.

IP2 agrees that the description in the Background Section of the Bases and Condition A Section of the Bases should be clarified.

Refer to IP2 UFSAR Figure 6.5-1 and the following discussion in the Background Section of the Bases and Condition A Section of the Bases (with clarifications marked in quotation marks):

ITS 3.6.9 Bases (Background):

The IVSW System distribution piping consists of five headers. Three of the five IVSW headers are pressurized by opening either "of two parallel, normally closed" air operated header injection valves. These valves open automatically on a containment Phase "A" isolation signal to admit seal water to the associated CIVs. One of the five IVSW headers is pressurized by opening either "of two parallel, normally closed", air motor operated, header injection" valves. These valves open automatically on a containment Phase "A" isolation signal to admit seal water to the associated CIVs. One IVSW header is used to supply seal water to CIVs on process lines that are not automatically closed on a containment Phase "A" isolation signal. This header is normally pressurized by the IVSW System with a normally closed manual or air-motor operated isolation valve for each pair of CIVs served by this IVSW header.

Redundant automatic header injection valves in parallel (SDV 3518/SDV 3519 and Valves 1410/1413) ensure the IVSW header is pressurized if there is a failure of one injection valve in either pair. Each of the two automatic header injection valves in each pair are actuated from separate and independent signals.

ITS 3.6.9 Bases (Condition A):

With one IVSW automatic actuation valve inoperable in either or both automatically actuated header, the

IVSW function is still available because the redundant automatic actuation valve is OPERABLE. Therefore, the 7 days is allowed to restore the IVSW automatic actuation valve to OPERABLE status.

**Entergy (IP2) Action:**

IP2 ITS 3.6.9, Rev S1, will delete the word "system" from the first part of condition.

IP2 will clarify the bases as described above.

IP2 will recommend that IP3 revise their Technical Specifications to match the proposed IP2 ITS for LCO 3.6.9, Condition A.

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### **3.6.9 : Isolation Valve Seal Water (IVSW) System**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.9 - 5</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

CTS 3.3.C.2.b  
ITS B3.6.9 Bases - A.1

CTS 3.3.C.2.b states that any IVSW system valve may be inoperable for up to 7 days provided that "all valves in the system that provide a duplicate function are operable". The CTS markup shows this requirement as being part of Condition A and Required Action A.1 when in fact this requirement "all valves...are operable" has been relocated to ITS B3.6.9 Bases.

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

#### **Entergy (IP2) Response:**

See Response to RAI 3.6.9-4 for Background.

The only valves in the IVSW system that perform a redundant function are the parallel automatic actuation valves for the three headers (SDV 3518/SDV 3519) and the parallel automatic actuation valves for the single headers (Valves 1410/1413). Therefore, CTS 3.3.C.2.b is interpreted as referring to these pairs of automatic isolation valves. Failure of any other single valve in the IVSW system results in one of the following: a) loss of IVSW to a single header (i.e., one header is inoperable and Condition A is applicable); b) loss of IVSW to one or more components in a single header (i.e., one header is inoperable and Condition A is applicable); or c) loss of IVSW to one or more headers (Condition B applies as justified in DOC L.1).

#### **Entergy (IP2) Action:**

None Required.

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## **3.6.10 : Weld Channel and Penetration Pressurization System (WC&PPS)**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.10 - 1</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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### **NRC Request for Additional Information (RAI):**

DOC A.3 (ITS 3.6.9)  
DOC A.4 (ITS 3.6.9)  
DOC A.4  
DOC A.5  
DOC M.1 (ITS 3.6.9)  
DOC M.4 (ITS 3.6.9)  
DOC M.5  
DOC M.6  
CTS 3.3.C.3 and 3.3.D.3  
ITS 3.6.9 ACTION C, 3.6.10 ACTION C and associated Bases

See Comment Number 3.6.9-1.

Comment: See Comment Number 3.6.9-1.

Comment Number 3.6.9-1 states the following:

DOC A.3  
DOC A.4  
DOC A.4 (ITS 3.6.10)  
DOC A.5 (ITS 3.6.10)  
DOC M.1  
DOC M.4  
DOC M.5 (ITS 3.6.10)  
DOC M.6 (ITS 3.6.10)  
CTS 3.3.C.3 and 3.3.D.3  
ITS 3.6.9 ACTION C, 3.6.10 ACTION C and associated Bases

CTS 3.3.C.3 specifies the actions to be taken if the IVSW system is not restored to OPERABLE status within the time period specified in CTS 3.3.C.2. CTS 3.3.D.3 specifies the Actions to be taken if the Weld Channel and Penetration Pressurization System (WC & PPS) is not returned to OPERABLE status within the time period specified in CTS 3.3.D.2. Both CTS 3.3.C.3 and 3.3.D.3 use the exact same words and in converting from the CTS to the ITS end up with the same ITS shutdown Action - ITS 3.6.9 ACTION C for CTS 3.3.C.3 and ITS 3.6.10 ACTION C for CTS 3.3.D.3. However, the CTS markup for both CTS 3.3.C.3 and 3.3.D.3 is different when they should be the same. The CTS markup shows that CTS 3.3.C.3.a is changed by DOCs A.3, A.4 and M.4 and CTS 3.3.C.3.b and c are changed by DOCs A.3 and M.1; while CTS 3.3.D.3.a is changed by DOCs A.5 and M.6 and CTS 3.3.D.3.b and c are changed by DOCs M.5 and M.6. A review of the DOCs shows that DOCs A.4 and A.5 (ITS 3.6.10) should be the same justification, DOCs M.4 and M.6 (ITS 3.6.10) should be the same, and DOCs M.1 and M.5 (ITS 3.6.10) should be the

same. Yet the discussions and justifications are not identical and lack some of the discussions and justifications that are found in the corresponding DOCs. In addition, the markup of CTS 3.3.C.3.b and c needs to show a DOC M.4 similar to the DOC M.6 (ITS 3.6.10) in the CTS markup of CTS 3.3.D.3.b and c, and the markup of CTS 3.3.D.3.a, b, and c needs to show a DOC A.4 (ITS 3.6.10) similar to DOC A.3 in the CTS markup of CTS 3.3.C.3.a,b and c.

Comment: Revise the CTS markups of CTS 3.3.C.3 and CTS 3.3.D.3 to be consistent and revise or provide the appropriate discussions and justification associated with the Administrative and More Restrictive changes made to these specifications.

**Entergy (IP2) Response:**

Addressed in Response to RAI 3.6.9-1 which states:

IP2 agrees that the markups and discussions of change for CTS 3.3.C.3 for ITS 3.6.9 and CTS 3.3.D.3 for ITS 3.6.10 should be the same.

IP2 will revise the markups and DOCS for CTS 3.3.C.3 for ITS 3.6.9 and CTS 3.3.D.3 for ITS 3.6.10 as follows:

ITS 3.6.9, DOC A.4 and ITS 3.6.10, DOC A.5, will revise to provide parallel discussions;

ITS 3.6.9, DOC M.1 and ITS 3.6.10, DOC M.6, will revise to provide parallel discussions;

ITS 3.6.9, DOC M.4 and ITS 3.6.10, DOC M.5, will revise to provide parallel discussions and the reference to DOC M.6 on CTS 3.3.D.2.b and c for ITS 3.6.10 was deleted; and

CTS 3.3.D.3.a and CTS 3.3.D.3.b and c for ITS 3.6.10 will revise to reference DOC A.4.

**Entergy (IP2) Action:**

Addressed in Response to RAI 3.6.9-1 which states:

IP2 revised the markups and DOCS for CTS 3.3.C.3 for ITS 3.6.9 and CTS 3.3.D.3 for ITS 3.6.10 as follows:

ITS 3.6.9, DOC A.4 and ITS 3.6.10, DOC A.5, were revised to provide parallel discussions;

ITS 3.6.9, DOC M.1 and ITS 3.6.10, DOC M.6, were revised to provide parallel discussions;

ITS 3.6.9, DOC M.4 and ITS 3.6.10, DOC M.5, were revised to provide parallel discussions and the reference to DOC M.6 on CTS 3.3.D.2.b and c for ITS 3.6.10 was deleted; and

CTS 3.3.D.3.a and CTS 3.3.D.3.b and c for ITS 3.6.10 were revised to reference DOC A.4.

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## **3.6.10 : Weld Channel and Penetration Pressurization System (WC&PPS)**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.10 - 2</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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### **NRC Request for Additional Information (RAI):**

JFD X.1  
CTS 4.4.B and associated Bases  
ITS SR 3.6.10.3 and associated Bases

Based on the CTS Bases discussion the sensitive leakage rate test CTS 4.4.B is part of the 10 CFR Appendix J Option B Type C leakage tests. Thus the test frequency is restricted; i.e., ITS SR 3.0.2 is not applicable to this test. ITS SR 3.6.10.3 is the corresponding ITS SR. The frequency specified for this SR is not restricted; i.e., ITS SR 3.0.2 is applicable. This is unacceptable. A Note should be added to the frequency of ITS SR 3.6.10.3 stating that "SR 3.0.2 is not applicable" similar to what was done for Indian Point 3 ITS SR 3.6.10.3.

Comment: Revise the CTS/ITS markups to reflect this SR Note addition and provide the appropriate discussion and justification for this change.

### **Entergy (IP2) Response:**

IP2 CTS 4.4.B, Sensitive Leakage Rate, is not required by 10 CFR 50, Appendix J, and is not part of the ITS or proposed IP2 ITS 5.5.14, Containment Leakage Rate Testing Program. IP2 CTS 4.4.B.3 establishes a Frequency of 24 months for the sensitive leak rate test and this SR Frequency is modified by CTS 4.0.1 which allows a 25% grace period identical to ITS SR 3.0.2. Therefore, the IP2 ITS SR 3.6.10.3 interval of 24 months with a grace period of 25% in accordance with ITS SR 3.0.2 is identical to the CTS requirement.

Note that IP3 SR 3.6.10.3 has a Frequency of 36 months and that SR 3.0.2 is not applicable. The 36 month interval without the 25% grace period was the IP3 requirement in the IP3 pre-ITS Tech Specs. IP3 elected to keep this interval rather than adopt the more restrictive 24 month Frequency with a 25% grace period.

IP2 CTS 4.4.A, Integrated Leak Rate Test, establishes all requirements for testing required by 10 CFR 50, Appendix J. As stated in CTS 4.4.A.3, "The integrated leakage rate test frequency shall be performed in accordance with 10 CFR 50 Appendix J, Option B as modified by approved exemptions and in accordance with guidelines contained in Regulatory Guide 1.163, dated September 1995." Test intervals for the program that implements 10 CFR 50, appendix J, Option B, are based on Section 11.0 of NEI 94-01 as specified in Section C.1 of Regulatory Guide 1.163, Performance Based Containment Leak Test Program. Because NEI 94-01 already includes a 25% "grace" period similar (not to exceed 15 months\*) to ITS SR 3.0.2, CTS 4.0.1 specifically excludes CTS 4.4.A from the 25% grace period applied to all CTS SRs. This restriction is intended to prevent "double-dipping" of the 25% grace periods in Tech Spec and the Containment Leak Rate Test Program.

ITS SRs that implement the containment Leak Rate Test Program always use a Frequency stated as "In

accordance with the Containment Leakage Rate Test Program." "Double-Dipping" of the 25% grace periods in Tech Spec and the Containment Leak Rate Test Program is prevented by the statement in NUREG-1431, 5.5.15.f, that states: "Nothing in these Technical Specifications shall be construed to modify the testing Frequencies required by 10 CFR 50, Appendix J." This approach negates the need to use "SR 3.0.2 is not applicable" for Frequencies established by the Containment Leak Rate Test Program. The approach used in NUREG-1431, Rev 2, is used in proposed IP2 ITS (5.5.14) and the approved IP3 ITS (5.5.15)).

\*NEI 94-01 "Industry Guideline for Implementing Performance based Option of 10 CFR Part 50, Appendix J", Section 11.3 specifies " An extension of up to 25 percent of the test interval (not to exceed 15 months) may be allowed on a limited basis for scheduling purposes only."

**Entergy (IP2) Action:**

None Required.

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### **3.6.10 : Weld Channel and Penetration Pressurization System (WC&PPS)**

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NRC RAI Number	TAC Number:	Date Received:	Date Responded:
<b>3.6.10 - 3</b>	<b>MB4739</b>	<b>8/13/2002</b>	<b>10/6/2002</b>

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#### **NRC Request for Additional Information (RAI):**

CTS 4.4.A.1e and 4.4.A.2  
ITS 5.5.14 and 5.5.15

See Comment Number 3.6.1-1.

Comment: See Comment Number 3.6.1-1.

Comment Number 3.6.1-1 states the following:

DOC A.1  
CTS 1.7.e, 3.6.A.1.f, 4.4.A.1, 4.4.A.2, 4.4.F and 4.4.G  
ITS 5.5.14 and 5.5.15.

The markups of CTS 1.7.e, 3.6.A.1.f, 4.4.A.1, 4.4.A.2, 4.4.F and 4.4.G show that the containment leakage requirements are relocated to ITS 5.5.15. ITS 5.5.15 is the "Battery Monitoring and Maintenance Program". The correct specification should be ITS 5.5.14 "Containment Leakage Rate Testing Program." See Comment Numbers 3.6.2-1, 3.6.3-1, and 3.6.10-3.

Comment: Correct this discrepancy.

#### **Entergy (IP2) Response:**

Agree

#### **Entergy (IP2) Action:**

Changed reference on CTS page 4.4-2 in Package ITS 3.6.10 from 5.5.15 to 5.5.14.