

December 31, 2002

Mr. J. A. Price  
Site Vice President - Millstone  
Dominion Nuclear Connecticut, Inc.  
c/o Mr. David A. Smith  
Rope Ferry Road  
Waterford, CT 06385

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION, BORATION, EMERGENCY  
CORE COOLING, CONTAINMENT SPRAY AND COOLING, AND AUXILIARY  
FEEDWATER SYSTEMS, MILLSTONE POWER STATION, UNIT NO. 2  
(TAC NO. MB5019)

Dear Mr. Price:

By letter dated May 7, 2002, you submitted a proposed amendment to the Technical Specifications (TS) for Millstone Power Station, Unit No. 2. The proposed amendment would relocate the Boration System TS requirements to the Technical Requirements Manual, relocate boron dilution analysis restrictions within the TS, and revise the TS Limiting Condition for Operation, action, and surveillance requirements associated with the Emergency Core Cooling, Containment Spray and Cooling, and Auxiliary Feedwater Systems.

The U.S. Nuclear Regulatory Commission staff is reviewing your submittal and has determined that additional information is required to complete the review. The specific information requested is addressed in the enclosure. We request that the additional information be provided by February 28, 2003. The response timeframe was discussed with Mr. Ravi Joshi of your staff on December 16, 2002. If circumstances result in the need to revise your response date, or if you have any questions, please contact me at (301) 415-1420.

Sincerely,

*/RA/*

Richard B. Ennis, Senior Project Manager, Section 2  
Project Directorate I  
Division of Licensing Project Management  
Office of Nuclear Reactor Regulation

Docket No. 50-336

Enclosure: Request for Additional Information

cc w/encl: See next page

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DATE	12/18/02	12/18/02	12/20/2002	12/23/02

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Unit 2

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REQUEST FOR ADDITIONAL INFORMATION  
REGARDING PROPOSED AMENDMENT TO TECHNICAL SPECIFICATIONS  
BORATION, EMERGENCY CORE COOLING, CONTAINMENT SPRAY AND COOLING, AND  
AUXILIARY FEEDWATER SYSTEMS  
MILLSTONE POWER STATION, UNIT NO. 2  
DOCKET NO. 50-336

By letter dated May 7, 2002, Dominion Nuclear Connecticut, Inc. (DNC or the licensee), submitted a proposed amendment to the Technical Specifications (TS) for Millstone Power Station, Unit No. 2 (MP2). The proposed amendment would relocate the Boration System TS requirements to the Technical Requirements Manual (TRM), relocate boron dilution analysis restrictions within the TS, and revise the TS Limiting Condition for Operation (LCO), action, and surveillance requirements associated with the Emergency Core Cooling, Containment Spray and Cooling, and Auxiliary Feedwater Systems.

The Nuclear Regulatory Commission (NRC) staff has reviewed the information the licensee provided that supports the proposed TS changes. In order for the NRC staff to complete its evaluation, the following additional information is requested.

1) General Comment

The licensee's application proposed to revise the MP2 plant specific current Technical Specification (CTS) 3/4.1.1.3, relocate CTS 3/4.1.2.1 through 3/4.1.2.8 to the TRM, revise CTS 3/4.5.2, 3/4.5.3, 3/4.6.2.1, and 4.7.1.2 to be consistent with NUREG-1432 "Standard Technical Specifications-Combustion Engineering Plants" and revise or delete as appropriate the Bases associated with these CTS. In the NRC staff's judgement, based on the extent and scope of the changes, the proposed amendment is in fact a mini conversion to the Improved Standard Technical Specifications (ISTS).

In accordance with Nuclear Energy Institute (NEI)-96-06, "Improved Technical Specifications Conversion Guidance," dated August 1996, the attachments to an ISTS conversion/mini-conversion application for each chapter/specification should include the following:

1. A reprinted copy of the proposed TS in the ISTS, or CTS, format;
2. Marked-up pages of the current TS to show the proposed changes as Administrative (A), More Restrictive (M), Less Restrictive-Specific (L), Less Restrictive-Generic (LA), and Relocated (R);
3. Discussion of the proposed changes of the current TS;
4. Marked-up pages of the ISTS and Bases to show the proposed changes;

Enclosure

5. Justification for differences between the proposed changes and the ISTS; and
6. Proposed no significance hazards consideration determination for the changes.

The May 7, 2002, application is lacking, or inadequate for Items 2, 3, and 5. The following request for additional information (RAI) addresses some of the concerns associated with Items 3 and 5, but is not inclusive. These items need to be provided before the review can be completed.

**Comment:** Revise the submittal to conform to the conversion guidelines.

2) General Comment

Except for the changes associated with the relocation of CTS 3/4.1.2.1 through 3/4.1.2.8, the majority of the changes had justifications which provided a description of the change and concluded that the change was acceptable because it was either consistent with standard industry practices and guidelines, consistent with other MP2 TS or requirements, consistent with the Standard Technical Specifications (STS) or a combination of these consistency justifications. Consistency with the STS, other CTS or standard industry practices and guidelines is not an adequate justification for concluding that a change is acceptable. Each change needs to be justified based on the technical merits of the change and its applicability to the MP2 specifications. Revising the submittal in accordance with RAI No. 1 would resolve most of this concern.

**Comment:** Revise the discussions and justifications for all the changes to provide justifications based on the technical merits of the changes and their applicability to the MP2 specifications.

3) 3/4.1.1.3 Boron Dilution

CTS 3/4.1.1.3  
CTS 3.1.2.3 Actions a and b  
CTS 3.1.2.4 Actions a and b  
Proposed TS (PTS) 3/4.1.3 Actions

CTS 3/4.1.1.3 has been modified by the addition of the restrictions that limits the number of charging pumps capable of injecting into Reactor Coolant System (RCS) to a maximum of two when RCS temperature is less than 300°F. These restrictions were part of the LCO, Actions, and Surveillance Requirements in CTS 3/4.1.2.3 and 3/4.1.2.4. PTS 3/4.1.1.3 Action b specifies the remedial actions to be taken if more than two charging pumps are capable of injecting into the RCS when the RCS temperature is less than 300°F. No action is proposed if no charging pumps are capable of injecting into the RCS under these operating conditions. If no charging pumps are capable of injecting into the RCS system, then it is assumed that the charging pumps are inoperable. In this situation the remedial measures to be taken when in Modes 1, 2, 3 and 4 are the Actions of CTS 3.0.3, an immediate shutdown (CTS 3.1.2.4 does not have an action for two charging pumps inoperable), and when in MODES 5 and 6, suspension

of “all operations involving CORE ALTERATIONS or positive reactivity changes until one charging pump is restored to OPERABLE status” (CTS 3.1.2.3 Action a).

**Comment:** Revise the Actions for PTS 3.1.1.3 to include remedial measures to be taken when no charging pumps are capable of injecting into the RCS when the RCS temperature is less than 300°F. Provide the appropriate discussions and justifications for this change.

4) 3/4.5.2 Emergency Core Cooling Systems (ECCS) Subsystems -  $T_{avg} \geq 300^{\circ}\text{F}$

CTS 3.5.2 and Associated Bases  
PTS 3.5.2 and Associated Bases

The requirement in CTS 3.5.2 that “Two separate and independent ECCS subsystems shall be OPERABLE” is modified in PTS 3.5.2 to delete the words “separate and independent.” The justification provided in Attachment 1 CTS 3.5.2 item 1 states that this information is in the MP2 Final Safety Analysis Report (FSAR) and thus it can be deleted. This is not entirely correct. In conversion space this item is not deleted but relocated to a licensee controlled document (i.e., FSAR). Since these words are also found in the Bases for CTS/PTS 3/4.5.2 it would be considered as a relocation to the Bases as well. In addition, just because the words are contained in those documents, is not an adequate justification for this change. No discussion or justification is provided as to why these words can be relocated.

**Comment:** Provide a discussion and justification for this Less Restrictive (LA) change.

5) 3/4.5.2 ECCS Subsystems -  $T_{avg} \geq 300^{\circ}\text{F}$

CTS 3.5.2 a, b, and c  
PTS 3.5.2 and Associated Bases

The requirements of CTS 3.5.2 which describe what constitutes an OPERABLE ECCS subsystem (CTS 3.5.2 a, b and c) are relocated in PTS 3.5.2 to the Bases. The justification provided in Attachment 1, CTS 3.5.2 item 2 only states that the Bases is the appropriate location for this information. The justification did not provide any reason as to why it is acceptable to relocate this information to the Bases other than the implied consistency with the STS (see RAI No. 2).

**Comment:** Provide a discussion and justification for this Less Restrictive (LA) change.

6) 3/4.5.2 ECCS Subsystems -  $T_{avg} \geq 300^{\circ}\text{F}$

CTS 3.5.2 Action a  
PTS 3.5.2 Action a

CTS 3.5.2 Action a requires that an inoperable ECCS subsystem be restored to OPERABLE status within 48 hours. PTS 3.5.2 Action a changes the 48 hours to 72 hours based on the emergency diesel generator (EDG) allowed outage time (AOT) of 72

hours and consistency with the STS (Attachment 1, CTS 3.5.2 item 3). Additional justification was also provided in Attachment 1 "Safety Summary - LCO and Action Requirement Changes," which stated that "As specified in Regulatory Guide (RG) 1.177, licensee initiated Technical Specification changes (surveillance frequencies and allowed outage times) that are consistent with currently approved NRC staff positions (e.g., NUREG-1432) do not require the submittal of risk information in support of the proposed changes." While the RG does not require a risk evaluation for proposed surveillance frequency and AOT changes that are consistent with approved staff positions, it does not alleviate the licensees' responsibility to provide an adequate justification for the change as implied by the submittal. These justifications are unacceptable for this Less Restrictive (L) change (see RAI No. 2).

**Comment:** Provide a discussion and justification for this Less Restrictive (L) change.

7) 3/4.5.2 ECCS Subsystems -  $T_{avg} \geq 300^{\circ}F$

CTS 3.5.2 Action a  
PTS 3.5.2 Action a

CTS 3.5.2 Action a requires that if the inoperable ECCS subsystem cannot be restored to OPERABLE status within the specified AOT, then the plant must "be in HOT SHUTDOWN within the next 12 hours." PTS 3.5.2 Action a changes the shutdown requirement to "HOT STANDBY within the next 6 hours and reduce pressurizer pressure to less than 1750 psia within the following 6 hours." The justification in Attachment 1, CTS 3.5.2 item 3 provided for this change states that "the current requirement to be in HOT SHUTDOWN is not consistent with the applicability of this specification (Mode 3 with pressurizer pressure  $\geq 1750$  psia)." The justification further states a consistency argument (see RAI No. 2) and states that there is no technical change since it is consistent with the current applicability and the total shutdown time of 12 hours. This is incorrect. CTS 3.5.2 Action a does not specify when the plant is to be in HOT STANDBY, only HOT SHUTDOWN. Thus, this change involves a technical change which is a More Restrictive (M) change (be in HOT STANDBY within 6 hours).

**Comment:** Provide a discussion and justification for this More Restrictive (M) change.

8) 3/4.5.2 ECCS Subsystems -  $T_{avg} \geq 300^{\circ}F$

CTS 4.5.2.a  
PTS 4.5.2.c, d, e, f, and g

CTS 4.5.2.a requires that specified components of each ECCS subsystem be demonstrated OPERABLE on a frequency of "at least once per 31 days on a STAGGERED TEST BASIS." PTS 4.5.2.c, d, e, f, and g changes the 31 day frequency to either "pursuant to specification 4.0.5" (92 day frequency) or 18 months. The justification in Attachment 1, CTS 3.5.2 and in the "Safety Summary" base the changes on consistency with the STS, industry standards and CTS (see RAI No. 2).

**Comment:** Provide a discussion and justification based on the technical merits of the change and its applicability to the MP2 specifications.

9) 3/4.5.2 ECCS Subsystems -  $T_{avg} \geq 300^{\circ}F$

CTS 4.5.2.a

PTS 4.5.2.a, b, c, d, e, f, and g

CTS 4.5.2.a requires that specified components of each ECCS subsystem be demonstrated OPERABLE on a frequency of "at least once per 31 days on a STAGGERED TEST BASIS." PTS 4.5.2 a through g deletes the requirement for testing on a "STAGGERED TEST BASIS." The justification in Attachment 1, CTS 3.5.2 is based on the premise that there is little or no benefit in specifying performance of the surveillance on a staggered test basis. This justification is inadequate. The advantage of testing on a staggered test basis is that the chances of a common mode failure and equipment unavailability are reduced.

**Comment:** Provide a discussion and justification for this Less Restrictive (L) change.

10) 3/4.5.2 ECCS Subsystems -  $T_{avg} \geq 300^{\circ}F$

CTS 4.5.2.a.1.a, and a.2.a

PTS 4.5.2.g

CTS 4.5.2.a.1.a and 4.5.2.a.2.a specify that the high-pressure safety injection pumps and low-pressure safety injection pumps start on an automatic test signal, respectively. Attachment 1, CTS 3.5.2, items 4.b and 5.b, state that these two surveillances will be deleted. This is incorrect. The discussion associated with these two items state that this requirement now becomes PTS 4.5.2.g. See RAI Nos. 2, 8, 9 and 11.

**Comment:** Provide a discussion and justification for this Less Restrictive (L) change.

11) 3/4.5.2 ECCS Subsystems -  $T_{avg} \geq 300^{\circ}F$

CTS 4.5.2.a.1.a, a.2.a, a.5, and c.1

PTS 4.5.2.f, g, h, and k

CTS 4.5.2.a.1.a, a.2.a, and c.1 require that the ECCS pumps and automatic valves start, open, close or restrict opening on a simulated or test actuation signal. CTS 4.5.2.a.5 requires that the containment sump isolation valves open on a sump recirculation actuation signal. The corresponding surveillances in the PTS (PTS 4.5.f, g, h, and k) verify the component actuation by an actual or simulated actuation signal. While the requirements of CTS 4.5.2.a.5 would allow the use of an actual or simulated actuation signal (an Administrative (A) change), the justification in Attachment 1, CTS 3.5.2 for this change, as well as the other Less Restrictive (L) changes is that the change "will provide additional flexibility in test performance." Additional flexibility is not an acceptable justification for these Administrative (A) and Less Restrictive (L) changes.

**Comment:** Provide a discussion and justification for these Administrative (A) and Less Restrictive (L) changes.

12) 3/4.5.2 ECCS Subsystems -  $T_{avg} \geq 300^{\circ}\text{F}$

CTS 4.5.2.a.3.a, a.6, c.5 and d

Attachment 1, CTS 3.5.2, items 6.b, 9, 18, and 19 state that CTS 4.5.2.a.3.a, a.6, c.5, and d, respectively, are deleted. This is incorrect. The discussions associated with these items state that they are to be relocated to the TRM, Inservice Testing (IST) Program, or CTS 6.13. Thus the changes to CTS 4.5.2.a.3.a, a.6 and d would be considered a Less Restrictive (LA) changes since these requirements are relocated to licensee controlled documents, and the change to CTS 4.5.2.c.5 would be considered an Administrative (A) change since the requirement is still in the Technical Specifications.

**Comment:** Revise the discussions and justifications associated with these Administrative and Less Restrictive (LA) changes.

13) 3/4.5.2 ECCS Subsystems -  $T_{avg} \geq 300^{\circ}\text{F}$

CTS 4.5.2.a.7 and a.8  
PTS 4.5.2.a

CTS 4.5.2.a.7 and a.8 are combined into PTS 4.5.2.a. The justification and discussion provided in Attachment 1, CTS 3.5.2 item 11 for converting CTS 4.5.2.a.8 to PTS 4.5.2.a states the following: "Therefore, relocation of this requirement is not expected to result in a reduction in the number of valves tested." This statement is incorrect. CTS 4.5.2.a.8 verifies the correct position of each remote or automatically operated valve regardless of whether the valve is locked, sealed or otherwise secured in position. PTS 4.5.2.a does not require position verification of locked, sealed or otherwise secured in position remote and automatic valves. This Less Restrictive (L) change has not been justified.

**Comment:** Provide a discussion and justification for this Less Restrictive (L) change.

14) 3/4.5.2 ECCS Subsystems -  $T_{avg} \geq 300^{\circ}\text{F}$

CTS 4.5.2.e.2 and f

CTS 4.5.2.e.2 and f specify post maintenance testing for safety injection valves and system modifications respectively. These specifications are to be deleted or relocated to the TRM respectively. The justification provided in Attachment 1, CTS 3.5.2 items 20.b and 21 for these Less Restrictive (L and LA) changes is that the "approach is consistent with NUREG-1432, which does not contain a requirement..." for post maintenance testing or system modifications. This is an incorrect statement. The Bases for STS SR 3.0.1 states the following: "Upon completion of maintenance,

appropriate post maintenance testing is required to declare equipment OPERABLE.”  
The corresponding surveillance in the CTS is CTS 4.0.1. Also see RAI No. 2.

**Comment:** Revise the discussion and justification for this Administrative (A) change.

15) 3/4.5.3 ECCS Subsystems - Tavg < 300°F

CTS 3.5.3 a and b  
PTS 3.5.3 and Associated Bases

The requirements of CTS 3.5.3 which describe what constitutes an OPERABLE high-pressure safety injection subsystem (CTS 3.5.2 a and b) are relocated in PTS 3.5.3 to the Bases. The justification provided in Attachment 1, CTS 3.5.3 item 1 only states that the Bases is the appropriate location for this information. The justification did not provide any reason as to why it is acceptable to relocate this information to the Bases other than the implied consistency with the STS (see RAI No. 2).

**Comment:** Provide a discussion and justification for this Less Restrictive (LA) change.

16) 3/4.5.3 ECCS Subsystems - Tavg < 300°F

CTS 3.5.3 Action a  
PTS 3.5.3 Action a

CTS 3.5.3 Action a requires that if an inoperable high-pressure safety injection subsystem cannot be restored to OPERABLE status within 1 hour, then the plant must be in COLD SHUTDOWN within the next 20 hours. PTS 3.5.3 Action a changes the 20 hours to 24 hours based on the premise that this is the standard time interval used in most TS, including CTS 3.0.3 and consistency with the STS (Attachment 1, CTS 3.5.3 item 3). Additional justification was also provided in Attachment 1 “Safety Summary - LCO and Action Requirement Changes,” which stated that “As specified in Regulatory Guide (RG) 1.177, Licensee initiated Technical Specification changes (surveillance frequencies and allowed outage times) that are consistent with currently approved staff positions (e.g., NUREG-1432) do not require the submittal of risk information in support of the proposed changes.” While the RG does not require a risk evaluation for proposed surveillance frequency and AOT changes that are consistent with approved NRC staff positions, it does not alleviate the licensee’s responsibility to provide an adequate justification for the change as implied by the submittal. These justifications are unacceptable for this Less Restrictive (L) change. See RAI No. 2.

**Comment:** Provide a discussion and justification for this Less Restrictive (L) change

17) 3/4.6.2.1 Containment Spray and Cooling Systems

CTS 3.6.2.1 Action a  
PTS 3.6.2.1 Action a

CTS 3.6.2.1 Action a requires that if the inoperable containment spray train cannot be restored to OPERABLE status within the specified AOT, then the plant must "be in HOT SHUTDOWN within the next 12 hours." PTS 3.6.2.1 Action a changes the shutdown requirement to "HOT STANDBY within the next 6 hours and reduce pressurizer pressure to less than 1750 psia within the following 6 hours." The justification in Attachment 1, CTS 3.6.2.1 item 1 provided for this change states that "The current requirement to be in HOT SHUTDOWN is not consistent with the applicability of this specification (Mode 3 with pressurizer pressure  $\geq$  1750 psia)." The justification further states a consistency argument (see RAI No. 2) and states that there is no technical change since it is consistent with the current applicability and the total shutdown time of 12 hours. This is incorrect. CTS 3.6.2.1 Action a does not specify when the plant is to be in HOT STANDBY only HOT SHUTDOWN. Thus this change involves a technical change which is a More Restrictive (M) change (be in HOT STANDBY within 6 hours).

**Comment:** Provide a discussion and justification for this More Restrictive (M) change.

18) 3/4.6.2.1 Containment Spray and Cooling Systems

CTS 4.6.2.1.1 a and 4.6.2.1.2  
PTS 4.6.2.1.1.b and c

CTS 4.6.2.1.1.a requires that specified components of each containment spray train be demonstrated OPERABLE on a frequency of "at least one per 31 days on a STAGGERED TEST BASIS." PTS 4.6.2.1.1.b and c changes the 31 day frequency to either "pursuant to specification 4.0.5" (92 day frequency) or 18 months. The justification in Attachment 1, CTS 3.6.2.1 and in the "Safety Summary" base the changes on consistency with the STS, industry standards and CTS (see RAI No. 2).

**Comment:** Provide a discussion and justification based on the technical merits of the change and its applicability to the MP2 specifications.

19) 3/4.6.2.1 Containment Spray and Cooling Systems

CTS 4.6.2.1.1.a and 4.6.2.1.2  
PTS 4.6.2.1.1 a, b, and c, and 4.6.2.1.2.a and b

CTS 4.6.2.1.1.a and 4.6.2.1.2 require that specified components of each containment spray train and each containment air re-circulation cooling unit be demonstrated OPERABLE on a frequency of "at least once per 31 days on a STAGGERED TEST BASIS." PTS 4.6.2.1.1.a, b, and c and 4.6.2.1.2.a and b delete the requirements for testing on a "STAGGERED TEST BASIS." The justification in Attachment 1, CTS 3.6.2.1 is based on the premise that there is little or no benefit in specifying performance of the surveillance on a staggered test basis. This justification is

inadequate. The advantage of testing on a staggered test basis is that the chances of a common mode failure and equipment unavailability are reduced.

**Comment:** Provide a discussion and justification for this Less Restrictive (L) change.

20) 3/4.6.2.1 Containment Spray and Cooling Systems

CTS 4.6.2.1.1.a.1 and 4.6.2.1.2.a

CTS 4.6.2.1.1.a.1 and 4.6.2.1.2.a specify that each containment spray pump and each containment air re-circulation and cooling unit be started from the control room. Attachment 1, CTS 3.6.2.1 items 2 b and 10 a state that these requirements are to be deleted since this is where these components are normally started, and that removal will not adversely impact test performance. The NRC staff agrees that this is a detail which may not be required to be in the TS, but it does not agree that it can be deleted. Since the discussion in Attachment 1, CTS 3.6.2.1 states that these components are normally started from the control room, it is implied that there are other locations at the plant where these components can be started. The NRC staff does not know why this particular test detail was included in the MP2 CTS other than to possibly demonstrate the ability to start the components from the control room under accident conditions. The staff believes that this detail should be relocated to a licensee controlled document (i.e., the Bases for 3/4.6.2.1).

**Comment:** Revise the Bases for 3/4.6.2.1 to include this detail and provide a discussion and justification for this Less Restrictive (L) change.

21) 3/4.6.2.1 Containment Spray and Cooling Systems

CTS 4.6.2.1.1.a.5  
PTS 4.6.2.1.1.c, 4.6.2.1.1.d, and 4.6.2.1.2.c

CTS 4.6.2.1.1.a.5 requires that the containment sump isolation valves open on a sump re-circulation actuation signal, and that a re-circulation mode flow path via an OPERABLE shutdown cooling heat exchanger is established. The corresponding surveillance in the PTS (PTS 4.6.2.1.1.c) verifies the valve actuation by an actual or simulated actuation signal. In addition, two new surveillances are added which verify that each containment spray pump and containment air re-circulation and cooling unit automatically starts on an actual or simulated actuation signal (PTS 4.6.2.1.1.d and 4.6.2.1.2.c respectively). While the requirements of CTS 4.6.2.1.1.a.5 would allow the use of an actual or simulated actuation signal (an Administrative (A) change), the justification in Attachment 1 provided for this change as well as the other More Restrictive (M) changes is that change "will provide additional flexibility in test performance. Additional flexibility is not an acceptable justification for allowing an actual actuation signal to be used for these Administrative (A) and More Restrictive (M) changes.

**Comment:** Provide a discussion and justification for these Administrative (A) and More Restrictive (M) changes.

22) 3/4.6.2.1 Containment Spray and Cooling Systems

CTS 4.6.2.1.1.a.4, 4.6.2.1.1.b, 4.6.2.1.1.c

Attachment 1, CTS 3.6.2.1 items 3, 6 and 7 state that CTS 4.6.2.1.1.a.4, 4.6.2.1.1.b and 4.6.2.1.1.c respectively, are deleted. This is incorrect. The discussions associated with these items state that they are to be relocated to the IST Program, or CTS 6.13. Thus, the changes to CTS 4.6.2.1.1.a.4, and 4.6.2.1.1.c would be considered a Less Restrictive (LA) change since these requirements are relocated to licensee controlled documents, and the change to CTS 4.6.2.1.1.c would be considered an Administrative (A) change since the requirement is still in the TS.

**Comment:** Revise the discussions and justifications associated with these Administrative and Less Restrictive (LA) changes.

23) 3/4.6.2.1 Containment Spray and Cooling Systems

CTS 4.6.2.1.1.a.5 and a.6  
PTS 4.6.2.1.1.a and 4.6.2.1.1.c

CTS 4.6.2.1.1.a.5 and a.6 are converted to PTS 4.6.2.1.1.a and 4.6.2.1.1.c. The justification and discussion provided in Attachment 1, CTS 3.6.2.1 item 5 for converting CTS 4.6.2.1.1.a.6 to PTS 4.6.2.1.1.a states the following: "Relocation of this requirement will not result in a reduction in the number of valves tested." This statement is incorrect. CTS 4.6.2.1.1.a.6 verifies the correct position of each remote or automatically operated valve regardless of whether the valve is locked, sealed or otherwise secured in position. No justification is provided to the similar change to CTS 4.6.2.1.1.a.5. PTS 4.6.2.1.1.a and 4.6.2.1.1.c do not require position verification or actuation of locked, sealed or otherwise secured in position remote and automatic valves. This Less Restrictive (L) change has not been justified.

**Comment:** Provide a discussion and justification for this Less Restrictive (L) change.

24) 3/4.6.2.1 Containment Spray and Cooling Systems

CTS 4.6.2.1.1.d  
PTS 4.6.2.1.1.e and Associated Bases

CTS 4.6.2.1.1.d specifies that unobstructed flow through the spray nozzles be demonstrated by an air or smoke flow test. Attachment 1, CTS 3.6.2.1 item 8 states that the details on the air or smoke flow test will not be retained in the TS. No justification is provided as to why they should not be retained nor why they have been relocated to the Bases for PTS 3.6.2.1.

**Comment:** Provide a discussion and justification for this Less Restrictive (LA) change.

25) 3/4.6.2.1 Containment Spray and Cooling Systems

CTS 4.6.2.1.1.d  
PTS 4.6.2.1.1.e

CTS 4.6.2.1.1.d specifies that the unobstructed spray nozzle flow test be performed on a frequency of "at least once per 5 years." PTS 4.6.1.1.e changes this frequency to "at least once per 10 years." The justification given for this Less Restrictive (L) change is consistency with Generic Letter 93-05 and the STS (see RAI No. 2).

**Comment:** Provide a discussion and justification based on the technical merits of the change and its applicability to the MP2 specifications.

26) 3/4.7.1.2 Auxiliary Feedwater Pumps

CTS 4.7.1.2.a  
PTS 4.7.1.2.b

CTS 4.7.1.2.a requires that each auxiliary feedwater pump be demonstrated OPERABLE on a frequency of "at least once per 31 days." PTS 4.7.1.2.b changes the 31 day frequency to "pursuant to specification 4.0.5" (92 day frequency). The justifications in Attachment 1, CTS 3.7.1.2 item 1.a and in the "Safety Summary" base the changes on consistency with the STS and industry standards (see RAI No. 2).

**Comment:** Provide a discussion and justification based on the technical merits of the change and its applicability to the MP2 specifications.

27) 3/4.7.1.2 Auxiliary Feedwater Pumps

CTS 4.7.1.2.a.1

CTS 4.7.1.2.a.1 specifies that each auxiliary feedwater pump be started from the control room. Attachment 1, CTS 3.7.1.2 item 1.b states that this requirement is to be deleted since this is where this component is normally started, and that removal will not adversely impact test performance. The NRC staff agrees that this is a detail which may not be required to be in the TS, but it does not agree that it can be deleted. Since the discussion in Attachment 1, CTS 3.7.1.2 states that this component is normally started from the control room, it is implied that there are other locations at the plant where this component can be started. The staff does not know why this particular test detail was included in the MP2 CTS other than to possibly demonstrate the ability to start the component from the control room under accident conditions. The staff believes that this detail should be relocated to a licensee controlled document, i.e., the Bases for 3/4.7.1.2.

**Comment:** Revise the Bases for 3/4.7.1.2 to include this detail and provide a discussion and justification for this Less Restrictive (L) change.

28) 3/4.7.1.2 Auxiliary Feedwater Pumps

CTS 4.7.1.2.a.1, a.2 and a.3  
PTS 4.7.1.2.b

In converting CTS 4.7.1.2.a.1, a.2 and a.3 to PTS 4.7.1.2.b, the following statement was added: "Not required to be performed for the steam turbine driven auxiliary feedwater pump until 24 hours after reaching 800 psig in the steam generators." The justification provided in Attachment 1, CTS 3.7.1.2 item 1.d for this statement and in particular the 24-hour time limit is consistency with Generic Letter (GL) 87-09 and the STS (see RAI No. 2). GL 87-09 is not the appropriate justification for the 24-hour time limit. The 24 hours used and justified in GL 87-09 was for time allowed to perform a missed surveillance, and had nothing to do with the time needed to reach steady-state/test conditions for a surveillance that could not be performed until after entering the applicability of a specification.

**Comment:** Provide a discussion and justification for this Less Restrictive (L) change.

29) 3/4.7.1.2 Auxiliary Feedwater Pumps

CTS 4.7.1.2.c  
PTS 4.7.1.2.c and 4.7.1.2.d

CTS 4.7.1.2.c.1 and 4.7.1.2.c.2 require that the auxiliary feedwater pumps and automatic valves start, open or close on a simulated or test actuation signal. The corresponding surveillances in the PTS (PTS 4.7.1.2.c and 4.7.1.2.d respectively) verify the component actuation by an actual or simulated actuation signal. The justification in Attachment 1, CTS 3.7.1.2 for this change is that the change "will provide additional flexibility in test performance." Additional flexibility is not an acceptable justification for this Less Restrictive (L) change.

**Comment:** Provide a discussion and justification for this Less Restrictive (L) change.

30) 3/4.7.1.2 Auxiliary Feedwater Pumps

CTS 4.7.1.2.a.4

Attachment 1, CTS 3.7.1.2 item 2 states that CTS 4.7.1.2.a.4 is deleted. This is incorrect. The discussion associated with this item states that it is to be relocated to the IST Program. Thus the changes to CTS 4.7.1.2.a.4 would be considered a Less Restrictive (LA) change since this requirement is relocated to a licensee controlled document.

**Comment:** Provide discussions and justifications associated with these Administrative and Less Restrictive (LA) changes.

31) 3/4.7.1.2 Auxiliary Feedwater Pumps

CTS 4.7.1.2.a.5, 4.7.1.2.a.6, and 4.7.1.2.c.1  
PTS 4.7.1.2.a and 4.7.1.2.c

CTS 4.7.1.2.a.5 and a.6 are combined into PTS 4.7.1.2.a. CTS 4.7.1.2.a.6 verifies the correct position of each remotely operated valve regardless of whether the valve is locked, sealed or otherwise secured in position. PTS 4.7.1.2.a does not require position verification of locked, sealed or otherwise secured in position remote and automatic valves. A similar change is made in converting CTS 4.7.1.2.c.1 to PTS 4.7.1.2.c. This Less Restrictive (L) change has not been justified.

**Comment:** Provide a discussion and justification for this Less Restrictive (L) change.