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Dominion Kewaunee
Dominion Nuclear Connecticut
Millstone 2 & 3
Dominion Virginia Power
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Indian Point 2 & 3
Entergy Nuclear South
ANO 2
Waterford 3
Exelon Generation Company LLC
Braidwood 1 & 2
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St. Lucie 1 & 2
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Turkey Point 3 & 4
Nuclear Management Co.
Palsades
Point Beach 1 & 2
Prairie Island 1 & 2
Omaha Public Power District
Fort Calhoun
Pacific Gas & Electric Co.
Diablo Canyon 1 & 2
Progress Energy
H. B. Robinson 2
Shearon Harris
PSEG - Nuclear
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South Carolina Electric & Gas Co.
V. C. Summer
Southern California Edison
SONGS 2 & 3
STP Nuclear Operating Co.
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J. M. Farley 1 & 2
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Tennessee Valley Authority
Sequoyah 1 & 2
Watts Bar 1
TXU Power
Comanche Peak 1 & 2
Wolf Creek Nuclear Operating Corp.
Wolf Creek

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Kori 1 - 4
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Yonggwang 1 - 6
NEK
Krško
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Ringhals AB
Ringhals 2 - 4
Spanish Utilities
Asco 1 & 2
Vandellos 2
Almaraz 1 & 2
Taiwan Power Co.
Maanshan 1 & 2

WCAP-15622-NP, Rev 0 (Non-Proprietary)
Project No. 694

September 27, 2005

WOG-05-414

Document Control Desk
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Subject: Comments on WCAP-15622-NP, Rev. 0 Draft Safety Evaluation (MUHP-3010)

Reference:

1. Letter, R. Gramm (NRC) to G. Bischoff (WOG), "Draft Safety Evaluation for Topical Report WCAP-15622, 'Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times' (TAC No. MB2257)" dated July 1, 2005.
2. "Transmittal of WCAP-15622, 'Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times', Non-Proprietary Class 3 (MUHP-3010)", OG-01-039, dated June 15, 2001.
3. "Transmittal of RAI Responses for WCAP-15622, 'Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times', (MUHP-3010)", OG-02-052, dated November 27, 2002.
4. "Response to Request for Additional Information - WCAP-15622-NP, Rev. 0, 'Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times'", WOG-03-635, dated December 10, 2003.

WCAP-15622-NP, Rev. 0, "Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times," was submitted by the Westinghouse Owners Group for NRC review and approval on June 15, 2001. This was supported by responses to RAIs in References 3 and 4. On July 1, 2005, the staff issued the reference draft safety evaluation for this report.

The purpose of this letter is to transmit comments on the draft safety evaluation. These comments offer suggested editorial changes, provide recommended changes to ensure a clear interpretation of the safety evaluation, and provide corrections. The comments are collated into three groups based on comment type; general technical comments, specific technical comments, and editorial comments.

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If you have any questions concerning this matter, please feel free to call Tom Laubham at 412-374-6788.

Sincerely yours,



Frederick P. "Ted" Schiffley, II, Chairman
Westinghouse Owners Group

FPS:TJL:mjl

Attachments: Tables 1, 2 and 3.

cc: Licensing Subcommittee
Steering Committee
Risk Management Subcommittee
R. A. Gramm, NRC
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PMO

WOG Comments on the NRC's Draft Safety Evaluation on WCAP-15622, "Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times"

Introduction to WOG Comments:

The WOG is concerned that the Staff's review of WCAP-15622 did not include a review of the plant specific PRA results as requested in letter OG-01-039, dated June 15, 2001 (Reference 1). Previous discussions with the Staff on the proposed approach, which consisted of using plant specific analysis using plant specific PRA models following a common methodology, led the WOG to believe this approach would be acceptable. These discussions were held during meetings between the NRC and the WOG on May 13, 1999, at the beginning of this program, and on October 3, 2001, after submittal of WCAP-15622 for NRC review. This approach is also similar to that used in Joint Application Reports by the CEOG and B&WOG for Completion Time (CT) extensions that were reviewed and approved by the NRC. The draft Safety Evaluation (SE) does not meet the WOG's expectations of the Staff's review, which was to include a review of the plant specific results. The following comments expand on the shortcomings of the draft SE.

References

1. OG-01-039, "Transmittal of WCAP-15622, "Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times", Non-Proprietary Class 3 (MUHP-3010)", June 15, 2001.
2. OG-02-052, "Transmittal of RAI Response for WCAP-15622, "Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times" (MUHP-3010)", November 27, 2002.
3. WOG-03-635, "Response to Request for Additional Information - WCAP-15622-NP, Rev. 0, 'Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times'", December 10, 2003.
4. WCAP-15622, "Risk-Informed Evaluation of Extensions to AC Electrical Power System Completion Times", May 2001.

TABLE 1: General Technical Comments

No.	SE Reference	Comment
1	N/A	As a clarification, when WCAP-15622 was initially issued to the NRC for review, eight plants were participating and provided plant specific analysis, results, and information to support the effort. Upon receipt of the NRC's first Request for Additional Information (RAIs), licensees for four of the plants did not provide responses to the RAIs at that time, but indicated they may at a future date if they decided to continue to pursue these Completion Time (CT) extensions. The remaining four plants (Callaway, McGuire, Comanche Peak, and Sequoyah) provided additional plant specific information to respond to the RAIs. This is explained in the beginning of Reference 2. Therefore, the SE should be revised to be consistent with this and only address the four plants that continued in the program. The information for the four plants not continuing in the program (Ginna, Catawba, Shearon Harris, and V.C. Summer) should be eliminated from the SE.
2	N/A	The plant specific information provided in response to the RAIs is based on updated PRA models, relative to the PRA models used in the plant specific analyses that supported development of the original WCAP. Therefore, this updated information replaces the information contained in the WCAP and provided the basis for the requested changes for the four plants continuing in the program (Callaway, Comanche Peak, McGuire, and Sequoyah). The Staff's review should focus on this updated information, not on the information in the WCAP which it replaced. In addition, information already submitted by licensees should not need to be resubmitted and be subject to additional Staff review unless revised information is provided by the licensee that supercedes previously provided information.
3	N/A	Specific comments are not provided on the draft SE cover letter. The cover letter should be revised to reflect the changes made to the SE based on the WOG's comments.

TABLE 2: Specific Technical Comments

No.	SE Reference	Comment
1	Sec. 1.0, Introduction (page 1, lines 18 and 27)	"at power" should be deleted, since the Completion Times are applicable in the Modes that Tech Specs 3.8.1 and 3.8.9 are applicable in, which are Modes 1, 2, 3, and 4.
2	Sec. 2.0, Regulatory Requirements and Guidance (page 3, line 17)	Delete the text starting with the sentence "The AOT generally refers...", up through and including the text on line 21, and delete the words "appears to" and replace them with "can," since there is no difference between the term Completion Time and Allowed Outage Time. As stated in NRC Inspection Manual, Part 9900: Technical Guidance, "Maintenance – Voluntary Entry Into Limiting Conditions For Operation Action Statements To Perform Preventive Maintenance," footnote 1, "Allowed outage time is a vernacular term for completion time,"
3	Section 3.1, Evaluation (page 4, line 32)	Delete "sources and distribution systems" and replace it with "vital buses."
4	Section 3.1, last paragraph (page 5, lines 18-19)	The referenced ISTS number should be 3.3.5 not 3.5.5. Additionally, the WOG did not request a change to the Completion Time for Required Action C.1 of Tech Spec 3.3.5. None of the requested Completion Time changes associated with Required Actions B.3.1, B.3.2, and B.4 of Tech Spec 3.8.1 imply a change to the Completion Time for Required Action C.1 of Tech Spec 3.3.5, nor is a change to the Completion Time for Required Action C.1 of Tech Spec 3.3.5 required. Required Action C.1 of Tech Spec 3.3.5, which requires the applicable Condition(s) and Required Action(s) for the associated diesel generator (DG) made inoperable by the loss of offsite power (LOOP) DG start instrumentation to be entered, is not impacted by the Completion Time changes associated with Required Actions B.3.1, B.3.2, and B.4 of Tech Spec 3.8.1. If the Required Action and associated Completion Time for A Condition or B of Tech Spec 3.3.5 are not met, the DG associated with the inoperable LOOP DG start instrumentation is declared inoperable, and the applicable Conditions and Required Actions of Tech Spec 3.8.1 for the inoperable DG are entered. Extensions to the Completion Times associated with Required Actions B.3.1, B.3.2, and B.4 of Tech Spec 3.8.1 are unrelated to the Completion Time for Required Action C.1 of Tech Spec 3.3.5. A change to the Completion Time for Required Action C.1 of Tech Spec 3.3.5 would have to be justified separately.
5	Section 3.2, first bullet (page 5, line 26)	<p>The NRC's statement that the Tier 1 results do not meet all the acceptance guidelines in RGs 1.174 and 1.177 is misleading. The Tier 1 results, including the revised Tier 1 results submitted to the NRC in References 2 and 3, for the plants that continued with the program, meet the vast majority of the guidelines for the requested changes. The guidelines not explicitly met, did meet the intent of the guideline to demonstrate a small impact on risk. Specifically:</p> <p><u>Callaway (from Reference 3):</u> A diesel generator (DG) CT change to 4.5 days for scheduled activities was requested. A CT of 72 hours will remain applicable to repair activities. Table RR-1 of Reference 3 presents the core damage frequency (CDF) and large early release frequency (LERF) related results. The increase in CDF and LERF, and the incremental conditional core damage probability (ICCDP) and incremental conditional large early release probability (ICLERP) all meet the Regulatory Guide (RG) guidelines.</p>

TABLE 2: Specific Technical Comments

No.	SE Reference	Comment
		<p><u>Comanche Peak (from Reference 3):</u> A DG CT change to 7 days was requested. Tables RR-2 and RR-3 of Reference 3 present the CDF and LERF related results. The increase in CDF and LERF, and the ICCDP for scheduled activities and the ICLERP for scheduled and repair activities all meet the RG guidelines. The ICCDP for repair events (7.4E-07) exceeds the guideline (5E-07), but this assumes the full CT will be used. In addition, the acceptance guidelines are not meant to be overly prescriptive, but to provide an indication, in numerical terms, of what is considered acceptable. Although it was indicated that an extension to 14 days would be requested by TXU for Comanche Peak, this WCAP requested an extension to only 7 days.</p> <p><u>McGuire (from Reference 2):</u> McGuire requested changes to the DG CT, DG common cause failure (CCF) CT, and the AC vital bus CT.</p> <p>An extension of the DG CT to 7 days was requested. The analysis results are provided in Table RAI 8-3 of Reference 2 for CDF and in Table RAI 16-1 of Reference 2 for LERF. The increase in CDF and LERF, and the ICCDP values meet the guidelines. The ICLERP values (6.7E-08 for scheduled activities and 8.8E-08 or repair activities) exceed the guideline (5E-08), but this assumes the full CT will be used. In addition, the acceptance guidelines are not meant to be overly prescriptive, but to provide an indication, in numerical terms, of what is considered acceptable.</p> <p>An extension of the DG CCF CT to 72 hours was requested. The analysis results are provided in Table RAI 8-5 of Reference 2 for CDF and in Table RAI 16-2 of Reference 2 for LERF. The increase in CDF and LERF, and the ICCDP and ICLERP values meet the guidelines.</p> <p>An extension of the AC vital bus CT to 24 hours was requested. The analysis results are provided in Table RAI 8-6 of Reference 2 for CDF and in Table RAI 16-3 of Reference 2 for LERF. The increase in CDF and LERF, and the ICCDP and ICLERP values meet the guidelines.</p> <p><u>Sequoyah (from References 2 and 4):</u> Sequoyah requested changes to the DG CCF CT and the AC vital bus CT.</p> <p>An extension of the DG CCF CT to 72 hours was requested. The analysis results are provided in Table 8-5 of Reference 4 for CDF and in Table RAI 16-2 of Reference 2 for LERF. The increase in CDF and LERF, and the ICCDP and ICLERP values meet the guidelines.</p> <p>An extension of the AC vital bus CT to 24 hours was requested. The analysis results are provided in Table RAI 8-6 of Reference 2 for CDF and in Table RAI 16-3 of Reference 2 for LERF. The increase in CDF and LERF, and the ICCDP and ICLERP values meet the guidelines.</p> <p>It is concluded from this that the statement in the draft SE is misleading and should be changed to reflect the actual results presented in the WCAP and responses to the RAIs.</p>

TABLE 2: Specific Technical Comments

No.	SE Reference	Comment
6	Section 3.2, first bullet (page 5, lines 27-28)	It is stated "...that the TR has not demonstrated that the proposed TS changes are acceptable without consideration of plant-specific Tier 2 and Tier 3 results." Note that it is stated in Sections 8.5 and 8.6, and in Step 5 of Appendices C, D, and F of WCAP-15622 that the Tier 2 and Tier 3 requirements will be included in the licensee's LAR.
7	Section 3.2, second bullet (page 5, lines 34-36)	It is stated "The proposed extension of the CT... is not supported by the TR." The proposed extension to the DG CCF CT is supported using a risk-informed (RI) approach. The statement in the SE is misleading and should be appropriately revised. This comment is discussed in detail in Specific Technical Comment 34.
8	Section 3.2, fourth bullet (page 6, line 3)	It is stated "The WCAP did not examine the sensitivity of each demonstration plant...". The plants with information included in the WCAP and RAI responses are not demonstration plants, but were included as part of a joint submittal with the objective of obtaining NRC approval for the changes. This is consistent with NRC and WOG discussions on May 13, 1999 and October 2, 2001. In these meetings it was understood that these results were not done to only demonstrate the approach, but also for the Staff to review as plant specific information to support future plant License Amendment Requests (LAR). It was understood that the licensees for these plants would submit a LAR for these changes with additional information that was not included in the WCAP. Information included in the WCAP, when approved by the NRC's SE, would be referenced in the LAR as necessary and not require further NRC review. Therefore, the plant information is not solely to demonstrate the approach and methods, but to obtain NRC approval of the results contained in the WCAP, and supplemented by References 2 and 3. The word "demonstration" should be eliminated.
9	Section 3.2, fourth bullet (page 6, lines 3-5)	<p>It is stated "The WOG did not examine the sensitivity of each...". It should be noted that the NRC did not request in any RAIs that the WOG examine the sensitivity of each plant to the model used by the respective licensees for the reactor coolant pump (RCP) seal during a seal loss of coolant accident (LOCA). RAI 4 of Reference 2 requested that the WOG "Provide a discussion on the CDF contributions when using the Rhodes model (SBO) and the effect on the conclusions stated in WCAP-15622". This information was provided in response to this RAI. In addition, RAI 1 of Reference 3 requested that the WOG "discuss the impact of the staff's safety evaluation of Topical Report WCAP-15603, Revision 1, "WOG 2000 Reactor Coolant Pump Seal Leakage Model for Westinghouse PWRs", on WCAP-15622 analysis and RAI responses." This information was provided in response to this RAI. In addition, RAI 2.e.4 of Reference 3 requested a discussion of the seal model used in the McGuire PRA (WCAP-15603 model) and the impact of the NRC's Safety Evaluation on May 20, 2003 on the analysis results. This was addressed in the response to this RAI.</p> <p>It is not clear why the information provided in response to the RAI 4 of Reference 2 and RAI 1 of Reference 3 is not sufficient for addressing the NRC's concern with the RCP seal leakage model used in the analyses.</p>

TABLE 2: Specific Technical Comments

No.	SE Reference	Comment
10	Section 3.2, fourth bullet (page 6, lines 5-7)	It is stated that "licensees must document the RCP seal model used in any plant-specific submittal based on WCAP-15622, as discussed in Appendix C of this SE." Information on the RCP seal leakage model used in each plant-specific PRA model is provided in the WCAP in Section 8.2.3 and 8.3.3 and supplemented as necessary in response to RAI 8 of Reference 2 and RAI 2.e.4 of Reference 3. This information, in conjunction with the information in the responses to RAI 4 of Reference 2 and RAI 1 of Reference 3, provide ample information with regard to RCP seal leakage issues. The NRC should review the information identified above.
11	Section 3.2, fifth bullet (page 6, lines 8-16) (also see Specific Technical Comment 4)	The referenced LCO should be 3.3.5, not 3.5.5. WCAP-15622 did not request an extension to the Completion Time for Required Action C.1 of Tech Spec 3.3.5; therefore, this CT is not affected by the Completion Time changes associated with Required Actions B.3.1, B.3.2, and B.4 of Tech Spec 3.8.1. This requirement should be eliminated from the SE. See Specific Technical Comment 4.
12	Section 3.2, sixth bullet (page 6, lines 17-22)	The plant-specific licensing basis as reflected in the plant-specific Tech Spec Required Actions associated with an inoperable AC vital bus do not require any changes due to extending the CT from 2 hours to 24 hours for restoring an inoperable AC vital bus to operable status. The plant-specific Tech Spec Required Action to restore an inoperable AC vital bus to operable status is not changed by extending the CT. This bullet should be deleted from the SE.
13	Section 3.2, seventh bullet (page 6, lines 23-31)	Extending the CT to restore an inoperable DG to operable status does not involve any design changes, only a change to the CT. Therefore compliance with GDC 17 is not impacted by extending the CT for the DG. Licensees requesting DG CT changes must ensure that the surveillances required to be performed to demonstrate DG operability following DG maintenance are not prohibited to be performed at-power by the Tech Specs, and must consider the type of maintenance that is going to be performed, otherwise the DG could not be declared to be operable following the maintenance. This may involve revising the Notes associated with certain SRs that prohibit them from being performed in Modes 1, 2, 3, and 4. The staff has approved revisions to these Notes, allowing them to be performed in Modes 1, 2, 3, and 4 in TSTF-283-A, Rev. 3, and also on a plant specific basis. It should be noted that the monthly DG surveillance is performed with the DG connected to the grid, since SR 3.8.1.2 in NUREG-1431 requires the DG to be loaded. Post maintenance testing following DG maintenance is discussed in the response to RAI 6.a in Reference 3. This bullet should be deleted from the SE.
14	Section 3.3, Evaluation (page 7, line 5)	Insert "AC" prior to "vital buses/bus."
15	Section 3.3.1, Evaluation (page 7, line 16)	Replace "Condition B" with "Required Actions B.3.1 and B.3.2" and delete "defines the requirements for DG operability" and delete the "s" in "provides."
16	Section 3.3.1, Evaluation (page 7, line 26)	Delete "applies" and replace it with "is applicable to" and delete "for entrance into the LCO" and replace it with "entry into Condition B of LCO 3.8.1."

TABLE 2: Specific Technical Comments

No.	SE Reference	Comment
17	Section 3.3.1, Evaluation (page 7, lines 30-31)	Delete "exercise this LCO...planned maintenance." and replace it with "require Required Action B.3.1 or B.3.2 to be completed, since the DG is inoperable due to planned maintenance."
18	Section 3.3.3, Evaluation (page 8, line 22)	Insert "B.1," after "A.1."
19	Section 3.4, first paragraph (page 8, lines 28-30)	It is stated "However, the NRC staff also finds that for the demonstration plants, the impact on plant risk might be unacceptable in comparison to the NRC acceptance guidelines." As noted in Specific Technical Comment 8, these are not demonstration plants. The term "demonstration" should be eliminated and these changes should be viewed as actual results.
20	Section 3.4, first paragraph (page 8, lines 28-30)	It is stated "However, the NRC staff also finds that for the demonstration plants, the impact on plant risk might be unacceptable in comparison to the NRC acceptance guidelines." As noted in Specific Technical Comment 5, the results for the four plants that responded to the RAIs, and therefore still actively supporting this program, meet the CDF, LERF, ICCDP, and ICLERP guidelines in RGs 1.174 and 1.177 in the vast majority of cases. Those that do not, still demonstrate a small risk impact for the proposed changes. Therefore, the risk is acceptable. The text in the SE needs to be revised to reflect this. The plants that did not provide additional information in response to the RAIs on References 2 and 3 are no longer participating in this program and should not be discussed in the SE. Note that the licensees continuing with this program will need to confirm their results remain applicable in their LAR or provide revised results.
21	Section 3.4, first paragraph (page 8, lines 30-37)	<p>The examples provided do not represent the plant specific results provided in the WOG RAI responses. As stated in the draft SE:</p> <ul style="list-style-type: none"> • "... the NRC staff found the proposed CT for LCO 3.8.1 (Required Action B.4, 72 hours to 7 days) typically resulted in incremental conditional core damage probability (ICCDP) values greater than RG 1.177 acceptance guidelines." As noted in Specific Technical Comment 5, all the ICCDP values meet the guidelines in RG 1.177 except for the ICCDP associated with repair activities for Comanche Peak, and this value is consistent with the intent of the RG guidelines. • "... for one plant, the change in core damage frequency (ΔCDF) did not meet the guidance for a small change." As noted in Specific Technical Comment 5, all the ΔCDF values meet the guidance provided in RG 1.174. • "For three of the five plants that evaluated a revision to LCO 3.8.1 (Required Actions B.3.1 or B.3.2, 24 to 72 hours) and for four of the five plants that evaluated a revision to LCO 3.8.9 (Required Action B.1, 2 to 24 hours), the ICCDP values for repair also exceeded the RG 1.177 acceptance guidelines." Only two plants (McGuire and Sequoyah) evaluated the risk impact of these changes and the ICCDP values for repair met the guidelines in RG 1.177.

TABLE 2: Specific Technical Comments

No.	SE Reference	Comment
22	Section 3.4, first paragraph (page 8, lines 37-40)	It is stated "Estimates for the change in large early release frequency (Δ LERF) and the incremental conditional large early release probability (ICLERP) were screened out of the WCAP-15622 analysis based on the assumed limited system CT impact on releases from containment, and therefore, were not provided in WCAP-15622." Δ LERF and ICLERP values were provided in response to RAI 16 in Reference 2 for all the requested changes for the four plants pursuing the CT extensions.
23	Section 3.4, second paragraph (page 9, lines 1-2)	It is stated "In response to an RAI, ...for some of the WCAP-15622 demonstration plants". As noted in Specific Technical Comment 8, these are not demonstration plants. The term "demonstration" should be eliminated and these changes should be viewed as actual requests.
24	Section 3.4, second paragraph (page 9, lines 1-2)	<p>This paragraph acknowledges that revised risk estimates were provided for ΔCDF, ΔLERF, ICCDP, and ICLERP by the participating plants. This information should be used by the Staff in assessing the acceptability of the proposed changes. The SE should be re-written to reflect this.</p> <p>In addition, it is stated "The revised estimates reflect the use of compensatory measures,..." Not all the licensees credited compensatory measures (McGuire for example). The SE should be revised to reflect this.</p>
25	Section 3.4, second paragraph (page 9, lines 9-10)	The last sentence states "Licensees must also evaluate changes to Δ CDF, Δ LERF, ICCDP, and ICLERP on a plant-specific basis." The Δ CDF, Δ LERF, ICCDP, and ICLERP information presented in the WCAP and in the RAI responses is based on plant specific analysis. The SE should be revised to reflect this.
26	Section 3.4, third paragraph (page 9, lines 11-14)	The first sentence states "Therefore, the NRC staff concludes that the TS changes..., do not always meet all the acceptance guidelines in RGs 1.174 and 1.177. Based on that, the NRC staff concludes that it has not been demonstrated that the specific changes proposed by the TR will be acceptable;..." These statements are incorrect and need to be updated to reflect the revised results provided in response to the RAIs. The analysis results do support the proposed changes.
27	Section 3.5.1.1, Evaluation (page 9, lines 26, 27, and 29)	Replace "availability" with "operability."
28	Section 3.5.1.1, Evaluation (page 9, lines 29-30)	Delete "1 hour and once every 8 hours thereafter" and replace it with "24 hours, if it can not be determined that the operable DG is not inoperable due to a common cause."
29	Section 3.5.1.1, Evaluation (page 9, lines 35, 36, and 38)	Replace "availability" with "operability."
30	Section 3.5.1.2, second paragraph (page 10, line 19)	Again, the term "demonstration" plant results is incorrect. As noted in Specific Technical Comment 8, these are not demonstration plants. The term "demonstration" should be eliminated and these changes should be viewed as actual requests.

TABLE 2: Specific Technical Comments

No.	SE Reference	Comment
31	Section 3.5.1.2, second paragraph (page 10, lines 20-22)	The statement "..., but the ICCDP values for a number of the plants were not within the acceptance guideline of 5.0E-07 given in RG 1.177." is not correct. As discussed in Specific Technical Comment 5, only McGuire and Sequoyah are pursuing this CT change. The ICCDP values for both plants meet the ICCDP guideline. This statement should be revised to reflect these results.
32	Section 3.5.1.2, second paragraph (page 10, lines 22-24)	The last sentence states "In addition, WCAP-15622 does not provide details on external event risk or estimates for ΔLERF and ICLERP." This statement is incorrect. As noted in Specific Technical Comment 5, the participating plants provided LERF information. This was in response to RAI 16 in Reference 2 and updated in Reference 3. With regard to external events, this information was provided in response to RAI 3 in Reference 3. The Staff's RAI on external events specifically requested "Discuss external event initiators and their impact on the proposed extended EDG completion times (fire, seismic, high wind, flood, and other external events)." The SE should be revised to reflect the information provided by the participating utilities.
33	Section 3.5.1.2 (page 10, lines 38-40)	The statement "The purpose of the TS requirement is to assure sufficient testability of the operable DG(s) pursuant to GDC 17 when one DG is inoperable." is not understood. GDC 17 establishes design requirements and the Tech Specs ensure equipment operability and address equipment inoperability. This is discussed in Reg Guide 1.93 (December 1974). The testability and compliance with GDC 17 for the operable DG are not impacted by the inoperability of the other DG.
34	Section 3.5.1.2 (page 10, lines 36-42, and page 11, lines 1-30)	<p>The Tech Specs specify the surveillances that must be performed to demonstrate DG operability, not functionality (line 40) or availability (line 41). As required by Required Action B.3.2 of Tech Spec 3.8.1, the performance of SR 3.8.1.2 demonstrates that the operable DG is not inoperable due to a common cause. The design of the DGs is not being changed, only an extension to the CT to perform SR 3.8.1.2 is being proposed, therefore it is not understood how the testability required by GDC 17 is impacted.</p> <p>The Staff has rejected the change to the CT extension for LCO 3.8.1, Condition B, Required Action B.3.1/B.3.2 since (from the end of paragraph 3, page 10, line 43-44) "risk informing the CCF evaluation is not consistent with the testability requirement of GDC 17." GDC 17 states "The onsite electric power supplies, including the batteries, and the onsite electric distribution system, shall have sufficient independence, redundancy, and testability to perform their safety functions assuming a signal failure." GDC 17 does not address diesel generator testing or performing common cause evaluations within 24 hours when one DG is inoperable. As discussed in the Bases for Technical Specification 3.8.1, "Required Action B.3.1 provides an allowance to avoid unnecessary testing of the OPERABLE DG(s). If it can be determined that the cause of the inoperable DG does not exist on the OPERABLE DG, SR 3.8.1.2 does not have to be performed." The Bases also states that "According to Generic Letter 84-15, [24] hours is reasonable to confirm that the OPERABLE DG(s) is not affected by the same problem as the inoperable DG." Regulatory Guide 1.93 states "Whenever the Technical Specifications allow power operation to continue during a specific degradation level, such continued power operation should be contingent on (a) an immediate verification of the availability and integrity of the remaining sources,..."</p>

TABLE 2: Specific Technical Comments

No.	SE Reference	Comment
		<p>Regulatory Guide 1.93 does not define what is meant by "immediate" in terms of a timeframe. Generic Letter 84-15 does not provide any specific information on "immediate verification" either. As discussed above, the Bases state that [24] hours is a reasonable timeframe to perform this verification. It should be noted that Reg. Guide 1.93 recommended a CT of 72 hours to restore an inoperable DG to operable status, and the Staff has approved risk-informed extensions in accordance with Reg. Guides 1.174 and 1.177 of up to 14 days for this CT.</p> <p>Extending the CT for this action does not impact the testability of the DGs. It also does not conflict with the above mentioned guidance (Reg Guide 1.93). Therefore, the Staff's rejection of this CT extension based on not satisfying GDC 17 is not valid and should be reconsidered.</p>
35	Section 3.5.1.3 (page 11, lines 34-36)	The Draft SE states "... the NRC staff concludes that the proposed extension of the 24-hour DG common cause CT to 72-hours does not provide sufficient testability of the operable DG(s) pursuant to GDC 17, and is, therefore, not acceptable." See Specific Technical Comment 34.
36	Section 3.5.2.1 (page 12, lines 33-35)	The discussion regarding limiting the time to approximately 1 hour each month that the DG can be connected to the offsite power system to permit load testing could not be identified in either IEEE 387-1984 or Reg. Guide 1.9, Rev. 3. Reg. Guide 1.9, Rev. 3, Section 2.2.2, "Load Run Test," recommends an interval of not less than 1 hour, which is a minimum, and not a maximum value, for this monthly test. Plants currently have the DG connected to the offsite power system for greater than one hour for DG testing. Additionally the specific date for IEEE 387 and revision for Reg Guide 1.9 that is being referred to should be identified, since there are different versions of the IEEE Standard and Reg Guide.
37	Section 3.5.2.1 (page 13, lines 11-14)	It is stated "Performing tests (e.g., the 24-hour load test) with the plant online..." See Specific Technical Comments 13 and 36. Some plants currently perform the 24 hour run surveillance on-line, therefore extending the CT for the DG would not impact performing this surveillance. It is not understood how extending the DG CT would impact regulatory requirements and offsite power sources being subject to a common mode failure for a longer period of time.
38	Section 3.5.2.2, second paragraph (page 14, lines 21-23)	It is stated "Appendix D does not consider the reevaluation of the common cause factors due to the known DG failures or maintenance outage." The common cause failure model used in each plant specific analysis applies the plant specific common cause failure values. For repair activities, the analysis applies the common cause failure value to the operable DGs. This is consistent with Regulatory Guides 1.174 and 1.177.
39	Section 3.5.2.2, second paragraph (page 14, lines 24-26)	It is stated "The Staff does not generically accept this WCAP position and will require, on a plant-specific basis, confirmation of conformance to the ΔLERF and ICLERP acceptance guidelines." As discussed in Specific Technical Comment 5, the participating utilities provided the plant specific ΔLERF and ICLERP values for the CTs under consideration in response to RAI 16 in Reference 2. These were updated in Reference 3. The SE should be revised to reflect this.

TABLE 2: Specific Technical Comments

No.	SE Reference	Comment
40	Section 3.5.2.2, third paragraph (page 14, lines 28-30)	It is stated "However, the ICCDP values for either a maintenance or repair DG CT of 7 days are all greater than the RG 1.177 acceptance guideline of 5.0E-07 and, therefore, do not meet the guidelines of RG 1.177." It is not clear how the Staff came to this conclusion. As noted in Specific Technical Comment 5, all the ICCDP values meet the 5E-07 guideline except for the ICCDP for repair events for Comanche Peak (7.4E-07). The SE should be revised to reflect the information provided by the participating utilities.
41	Section 3.5.2.2, third paragraph (page 14, lines 32-33)	It is stated "Also note that WCAP-15622 does not provide the impact of internal flooding or external event risks." The impact of external events is addressed in the response to RAI #3 in Reference 3. Internal flooding is included in the internal events PRA models. The Staff needs to factor this information into the SE or explain why it is unacceptable.
42	Section 3.5.2.2, fifth paragraph (page 15, lines 21-23)	It is stated "... the shutdown risk averted may provide a qualitative risk benefit, but should not be credited ...". It should be noted that the shutdown risk averted is not credited in the plant specific Δ CDF, ICCDP, Δ LERF, or ICLERP calculations. Values for these parameters are based solely on the at-power risk.
43	Section 3.5.2.2, sixth paragraph (page 15, lines 26-28)	It is stated "Additionally, estimates of Δ LERF, ICLERP, external event risk, and cumulative risk ... are required for a plant specific submittal." As noted in Specific Technical Comment 5 estimates of Δ LERF and ICLERP have been provided, and as noted in Specific Technical Comment 41 external event risk has been discussed. The SE should be revised to reflect this.
44	Section 3.5.2.3 (page 15, lines 37-41)	Regarding the open safety issues referred to in the SE, see Specific Technical Comments 13 and 36.
45	Section 3.5.2.3, second paragraph (page 16, lines 2-5)	It is stated "... the NRC staff concludes that the TS changes proposed in WCAP-15622 to extend the DG CTs do not always meet all the acceptance guidelines in RGs 1.174 and 1.177. Therefore, it has not been demonstrated that the specific changes proposed by the WCAP will be acceptable." The Staff needs to revise these statements in the draft SE to be consistent with the information provided in response to the RAIs. When considering the revised information that was provided, this statement is incorrect.
46	Section 3.5.3.1 (page 16, line 26)	Delete the reference to "STS." The Tech Spec changes proposed by WCAP-15622 are marked up on NUREG-1431, the ISTS, which have replaced the STS, and are now the Standard Tech Specs for Westinghouse Plants. The changes to the CTs proposed by WCAP-15622 do not change the Actions contained in the plant-specific Tech Specs in NUREG-0452 Standard Tech Specs.
47	Section 3.5.3.1 (page 16, line 40 to page 17, line 7)	Delete from "The STS based on the ... through Section 4.0 of this SE." See Specific Technical Comment 46.
48	Section 3.5.3.2, second paragraph (page 17, lines 20-21)	It is stated "...but the estimates for ICCDP (in repair) typically exceed the acceptance guidelines of RG 1.177." As noted in Specific Technical Comment 5, all the risk values, including ICCDP for repair, meet the RG guidelines. The SE needs to be revised to reflect this.

TABLE 2: Specific Technical Comments

No.	SE Reference	Comment
49	Section 3.5.3.2, second paragraph (page 17, line 21)	It is stated that the V.C. Summer Nuclear Station does not meet the ICCDP (in maintenance) guideline. As noted in General Comment 1, the Summer plant decided not to continue pursuing the WCAP-15622 CT extensions. This was originally explained in Reference 2. Therefore, this reference to the Summer plant should be removed from the SE.
50	Section 3.5.3.2, second paragraph (page 17, lines 22-24)	It is stated "In addition, estimates for Δ LERF, ICLERP, vital AC bus repairs assumed per year, external events, and cumulative risk are required for a plant specific submittal...". As noted in Specific Technical Comment 5, LERF and ICLERP valves are provided in responses to RAIs (see References 2 and 3). In addition, external events were addressed in Reference 3 in response to RAI 3. The SE needs to be revised to reflect this.
51	Section 3.5.3.3 (page 17, lines 30-36)	Delete "subject to the resolution... through to a plant licensing basis." See Specific Technical Comment 12.
52	Section 3.5.3.3, second paragraph (page 17, lines 39-41)	It is stated "... CTs do not always meet all the acceptance guidelines in RGs 1.174 and 1.177. Therefore, it has not been demonstrated that the specific changes proposed by the WCAP will be acceptable." This statement is incorrect as noted in Specific Technical Comments 5 and 48, and the SE should be revised to accurately account of the information provided to the Staff in response to their RAIs.
53	Section 3.7 (page 18, line 30 to page 19, line 7)	With regard to the issue related to the DG CT extension impacting the CT for LOOP instrumentation, please see Specific Technical Comment 11. This section should be deleted from the SE.
54	Section 4.0, Conditions for Referencing WCAP-15622 (page 19, lines 24-30)	Delete "Operability of the AC vital...through Section 3.5 of the SE." See Specific Technical Comment 12.
55	Section 5.0, Item #3 (page 20, line 2)	Additional information associated with an extended CT for LOOP DG start instrumentation is not necessary (see Specific Technical Comment 11). This item should be eliminated from Section 5.0.
56	Section 6.0 (page 20, lines 12-14)	It is stated "However, for the proposed extension to the CT for the common cause evaluation for an inoperable DG, the methodology in the TR is not acceptable." The Staff's rejection of this CT extension since it is in conflict with GDC 17 is not valid and should be reconsidered. See Specific Technical Comment 34 for details.
57	Section 6.0 (page 20, line 17)	It is stated "... because the NRC staff review of the demonstration plant information...". As discussed in Specific Technical Comment 8, the plants with information included in the WCAP and RAI responses are not demonstration plants. The word "demonstration" should be eliminated.
58	Section 6.0 (page 20, line 21)	It is stated "Since many of the demonstration plant results did not meet the NRC's acceptance guidelines, as discussed in this SE, ..." As discussed in Specific Technical Comment 5 and several other Specific Technical Comments, this is an incorrect statement and needs to be revised to correctly reflect the analyses results provided by the participating plants (Callaway, Comanche Peak, McGuire, and Sequoyah).

TABLE 2: Specific Technical Comments

No.	SE Reference	Comment
59	Section 6.0 (page 20, lines 18-20)	It is stated "The NRC staff will consider the requested extended CTs based on individual, plant-specific submittals, ..." The objective of this WCAP was to develop an acceptable approach to justify CT extensions, apply this approach to several plants, and receive acceptance from the NRC for the information provided and reviewed by the Staff. This was discussed and agreed to with the Staff when the program was started. This approach is also consistent with joint application reports from other Owners Groups. The Staff is strongly encouraged to include in the SE approval of information provided by the licensees for their plants. This will reduce the Staff's resource requirements in the future and streamline the review process; plant specific information will not be required to be re-reviewed by different Staff reviewers. The Staff reviewers will then be able to concentrate on reviewing additional supporting information provided by the licensees in their plant specific license amendment requests, some of which have already been submitted to the NRC. The SE needs to be revised to reflect this approach.
60	Appendix A, Section A.1, fourth paragraph (page A-1, lines 24-29)	It is stated "Although the proposed TS changes are intended to be generically applicable..." and continues "Thus, the NRC staff views the plant-specific information provided in WCAP-15622 as demonstrating the methodology, as opposed to supporting an NRC staff finding on the plant-specific results." As a clarification, the WCAP methodology is generically applicable, but each plant is required to evaluate the acceptability of the CT changes following the methodology and using their plant specific PRA model. Therefore, the Staff approach that the plant-specific information provided in the WCAP demonstrates the methodology is only partially correct. The plant-specific information provided also provides the basis for justifying the CT extension for those plants following the methodology and completing a plant-specific analysis. This plant-specific information has been reviewed by the Staff and the acceptance of it should be stated in the SE. Licensees would then confirm the applicability of the results the Staff has reviewed and approved in their LAR. The LAR would also provide additional supporting information, as required by the NRC, not included in the WCAP and RAI responses. This paragraph needs to be revised to reflect this approach. This approach is the same as that successfully used in the past by other Owners Groups for changes to Tech Spec CTs.
61	Appendix A, Section A.1, sixth paragraph (page A-1, line 37 to page A-2, line 8)	As noted in General Comment 1, the only plants that continued in the program and provided responses to RAIs are Callaway, McGuire, Comanche Peak, and Sequoyah. The other plants should be eliminated from this list.
62	Appendix A, Section A.1, last paragraph (page A-2, lines 10-11)	It is stated "...but is not making any finding on the acceptability of these plants to implement the proposed changes." As previously stated, this is inconsistent with the WOG's expectations and discussions with the Staff when the program was started. Conditional approval of the changes for the plants providing information will greatly reduce resource requirements for both the NRC and the participating utilities, since the information has already been reviewed by the Staff. The Staff is strongly encouraged to change the approach defined in this paragraph to that initially agreed to between the Staff and the WOG.

TABLE 2: Specific Technical Comments

No.	SE Reference	Comment
63	Appendix A, Section A.3, first paragraph (page A-3, line 7)	As previously discussed, referring to the plants that supported that program as demonstration plants is not correct. This should be revised.
64	Appendix A, Section A.3, third paragraph (page A-3, line 24):	It is stated "The TR provides a Tier 1 discussion and partial quantification...". Is not understood why the Staff considers this a "partial" quantitative Tier 1 evaluation. All Tier 1 quantification issues have been addressed. This paragraph should be revised to be consistent with the information provided to the NRC.
65	Appendix A, Section A.3, third paragraph (page A-3, lines 26-32)	It is stated "However, WCAP-15622 does not address Δ LERF or ICLERP in the analysis, ...". As noted in previous comments (Specific Technical Comment 5, for example), Δ LERF and ICLERP were provided in Reference 2 in Response to RAI 16 and updated in Reference 3. The SE needs to be revised to be consistent with the information provided by the WOG.
66	Appendix A, Section A.3, part (a), third bullet (page A-4, line 27)	ASME RA-S-2002 is not applicable to the PRA models used to support the analysis for the WCAP. This standard was not available when the analysis was done. This requirement should be deleted for the plants submitting the CT extension requests prior to the availability of the standard.
67	Appendix A, Section A.3, part (b), second paragraph (page A-5, lines 20-21)	It is stated "However, the results for ICCDP generally show that the RG 1.177 acceptance guidelines are exceeded for the proposed CTs." The revised results provided in References 2 and 3 demonstrate that the ICCDP guidelines are met in all but one case for one plant. The SE needs to be revised to be consistent with the information provided by the WOG. This is discussed in more detail in Specific Technical Comment 5.
68	Appendix A, Section A.3, part (b), second paragraph (page A-5, lines 21-22)	It is stated "... the TR does not include estimates for LERF and ICLERP for the proposed extended CTs,...". As noted in previous comments (Specific Technical Comment 5, for example), Δ LERF and ICLERP were provided in Reference 2 in Response to RAI 16 and updated in Reference 3. The SE needs to be revised to be consistent with the information provided by the WOG.
69	Appendix A, Section A.3, part (b), third paragraph, fourth bullet (page A-5, line 31)	Please explain what is meant by "Reducing the number of CT extension requests." The four plants continuing in the program did not reduce the number of CT extension requests.
70	Appendix A, Section A.3, part (b), last paragraph (page A-6, lines 19-20)	It is stated "In conclusion, as shown in the WCAP-15622 tables, the results for CDF and ICCDP are not consistently within the acceptance guidelines for RGs 1.174 and 1.177." The revised results provided in References 2 and 3 demonstrate that the Δ CDF and ICCDP guidelines are met in all but one case for one plant. The SE needs to be revised to be consistent with the information provided by the WOG. This is discussed in more detail in Specific Technical Comment 5.
71	Appendix A, Section A.5, last paragraph (page A-7, lines 32-33)	It is stated "Because WCAP-15622 was based on generic plant characteristics, ...". WCAP-15622 is based on a generic methodology applied on a plant specific basis using plant specific PRA models. Stating that WCAP-15622 was based on generic plant characteristics is incorrect and the SE should be revised to correct this.

TABLE 2: Specific Technical Comments

No.	SE Reference	Comment
72	Appendix A, Section A.6 (page A-7, line 38 and page A-8, line 1)	As previously discussed, referring to the plants that supported that program as demonstration plants is not correct. This should be revised.
73	Appendix A, Section A.6 (page A-7, line 39-40)	It is stated "... in a number of cases an increase in risk from the proposed extension of DG and vital AC bus CTs that was larger than the acceptance guidelines of the RGs." and further stated "Since many of the demonstration plant results did not meet the NRC acceptance guidelines,...". The revised results provided in References 2 and 3 demonstrate that the Δ CDF and ICCDP guidelines are met in all but one case for one plant and the Δ LERF and ICLERP guidelines are met in all but two cases for one plant. The SE needs to be revised to be consistent with the information provided by the WOG. This is discussed in more detail in Specific Technical Comment 5.
74	Appendix C, first paragraph (page C-1, line 13)	As previously discussed, referring to the plants that supported that program as demonstration plants is not correct. This should be revised.
75	Appendix C	This presents the Staff's current position on RCP seal models. This position was established in parallel with the WOG program evaluating changes to DG CTs. Therefore, the plant PRA models used in the analyses supporting these CT extensions were not necessarily consistent with this position, but the WOG provided sensitivities to assess the potential impact (see RAI 1 of Reference 3). Furthermore, the Staff has previously approved DG CT extensions for other plants that are based on PRA models not consistent with this position. Therefore, use of the RCP seal models specified in this appendix should not be a requirement for the plants participating in this program. In addition, McGuire has already responded to a site specific RAI (RAI 2.e.4, Reference 3) addressing the RCP seal model in WCAP-15603. This addressed its use and the impact of the Staff's SE on WCAP-15603 on the participating plant's analysis results for the extended CTs.
76	Appendix E, Section E.2, item 1c (page E-2, line 4)	ASME RA-S-2002 should not be applicable to plants submitting the CT extension requests prior to the availability of the standard. See Specific Technical Comment 66.
77	Appendix E, Section E.2, Item 2 (page E-2, line 30)	It is stated "Licensees should provide supplemental Tier 1, 2, and 3 evaluations...". Since the participating utilities provided complete Tier 1 analyses, this requirement should be eliminated for the plants currently participating in this program.
78	Appendix E (page E-2, lines 36-39, and page E-3, lines 1-4)	Delete this discussion. See Specific Technical Comment 4.
79	Appendix E (page E-3, lines 28-29)	Should be revised to delete alternate power sources and other compensatory measures from the discussion. The alternate power sources may not, and do not have to be in compliance with General Design Criterion (GDC) 17. Guidance for SBO DGs is contained in Reg. Guide 1.155.
80	Appendix E (page E-4, lines 3-5)	The discussion regarding the Information Notice 97-21 should be clarified that it is only required if the SBO DG is used as the alternate AC source.

TABLE 2: Specific Technical Comments

No.	SE Reference	Comment
81	Appendix E (page E-5, lines 20-21)	The statement "Note that the staff review...might identify the need for additional information not addressed in this appendix." is not definitive and does not meet the intent of an SE, which is to identify any plant-specific information required to be submitted by the licensee to obtain NRC approval. This statement should be revised to clearly identify any information required to be submitted in order to obtain NRC approval, or be deleted from the SE.
82	Appendix F (page F-1, lines 8-9)	Delete "Second CTs are to deal... (LCOs)" and replace it with "The second CT establishes a limit on the maximum time allowed for a combination of inoperable equipment in the same Limiting Condition for Operation (LCO) during any single contiguous occurrence of failing to meet the LCO."
83	Appendix F (page F-1, line 35)	Delete "No second CT was established in the standard TSs (STS), but..." The Tech Spec changes proposed by WCAP-15622 are marked up on NUREG-1431, the ISTS, which have replaced the STS, and are now the Standard Tech Specs for Westinghouse Plants.
84	Appendix F (page F-2, line 6)	Insert ", B.1," after "A.1."
85	Appendix F (page F-3, line 33)	Insert the following text after "not met" "instead of at the time Condition A was entered. This results in the requirement, when in this Condition, to track the time elapsed from both the Condition A "time zero," and the "time zero" when LCO 3.8.1 was initially not met."
86	Appendix F (page F-3, line 35)	Insert the applicable paragraphs associated with the second CT discussion for Required Action B.4 in the Bases for Tech Spec 3.8.1 contained in TSTF-417, Rev. 0 after line 35. The Bases discussions for Required Actions A.3 and B.4 are different.
87	Appendix F (page F-3, lines 37 and 38)	Delete "required action" and insert "second CT."
88	Appendix F (page F-4, line 4)	Delete "and third" since there is no third CT.
89	Appendix F (page F-4, line 26)	Delete "[when Condition A was entered]" and insert "Condition A" prior to "time zero."
90	Appendix F (page F-4, line 29)	Insert the applicable paragraphs associated with the second CT discussion for Required Actions B.1 and C.1 in the Bases for Tech Spec 3.8.9 contained in TSTF-417, Rev. 0 after line 29. The Bases discussions for Required Actions A.1, B.1, and C.1 are different.

TABLE 3: Editorial Comments

No.	SE Reference	Comment
1	Cover Page	Insert "Westinghouse" in front of "Owners Group" in the second line of the address of the transmittal letter.
2	Cover Page	The third reference in the first paragraph of the transmittal letter, "OG-03-653" should be changed to "WOG-03-635."
3	Section 1.0, Introduction (page 1, line 19)	Insert "[required]" after "One" and delete "[diesel generator]" after "DG."
4	Section 1.0, Introduction (page 1, line 20)	Insert "or more" after "One" and revise "bus" to "buses."
5	Section 2.0, Regulatory Requirements and Guidance (page 2, line 35)	Revise "evaluation" to "evaluations."
6	Section 2.0, Regulatory Requirements and Guidance (page 2, line 41)	Revise "required of systems" to "of required systems."
7	Section 3.1, Evaluation (page 4, line 34)	Insert "the" after "Increase" and "confirm."
8	Section 3.1, Evaluation (page 5, line 5 and line 11)	Insert "the" after "Increase."
9	Section 3.1, Evaluation (page 5, line 15)	Insert "the" prior to "CTs."
10	Section 3.2, Evaluation (page 5, line 35)	Insert "perform" prior to SR 3.8.1.2, and add parenthesis to DG(s).
11	Section 3.2, Evaluation (page 6, line 1)	Insert "the" prior to "NRC staffs."
12	Section 3.3, Evaluation (page 7, line 2)	Revise "Section 3.2.1" to "Tech Spec 3.8.1."
13	Section 3.3, Evaluation (page 7, line 4)	Insert "Tech Spec 3.8.9 of" prior to "the ISTS."
14	Section 3.3.1, Evaluation (page 7, line 24)	Insert "Required Action" prior to "B.3.1 or B.3.2" and delete "actions" after "B.3.1 or B.3.2."
15	Section 3.3.1, Evaluation (page 7, line 27)	Insert "Bases for Tech Spec 3.8.1 of the" prior to "ISTS."
16	Section 3.3.2, Evaluation (page 7, line 37)	Insert "Bases for Tech Spec 3.8.1 of the" prior to "ISTS."
17	Section 3.3.2, Evaluation (page 8, line 1)	Delete "The" prior to "LCO" and insert "Condition B" prior to "Required Actions."
18	Section 3.3.3, Evaluation (page 8, line 4)	Insert "Bases for Tech Spec 3.8.1 of the" prior to "ISTS."
19	Section 3.3.3, Evaluation (page 8, line 8)	Delete the second "protection" from "protection system protection racks."
20	Section 3.3.3, Evaluation (page 8, line 17)	Capitalize the "R" and "A" in "required actions."
21	Section 3.5.1.1, Evaluation (page 9, line 26)	Insert "I" prior to "STS."
22	Section 3.5.2.1, third paragraph (page 12, line 30)	10 CFR 50.35 should be changed to 10 CFR 50.36.

TABLE 3: Editorial Comments

No.	SE Reference	Comment
23	Section 4.0, Conditions for Referencing WCAP-15622 (page 19, line 20)	Insert "for Tech Spec 3.8.9" after "ISTS Bases."
24	Appendix E (page E-5, line 1)	Delete "its" and replace it with "their."
25	Appendix F (page F-2, line 11)	Replace "DG" with "AC vital bus."
26	Appendix F (page F-2, lines 19 and 20)	Move "electrical power distribution subsystem" to after "AC" and "DC."
27	Appendix F (page F-2, line 31)	Insert "bus" after "AC" and "DC."
28	Appendix F (page F-2, line 32)	Change "bases" to "basis."
29	Appendix F (page F-2, lines 34, 39, and 40)	Insert "bus" after "AC" and "DC."
30	Appendix F (page F-2, line 43)	Insert "bus" after "AC" and "DC."
31	Appendix F (page F-3, line 4)	Revise "DC" to "AC."
32	Appendix F (page F-3, line 7)	Make "Statement" plural.
33	Appendix F (page F-3, line 10)	Delete "LCO" and insert Tech Spec, and insert "Actions" after 3.8.1.
34	Appendix F (page F-3, line 23)	Delete the brackets around "[it is]" and delete the hyphen from "[10]-day."
35	Appendix F (page F-3, lines 27 and 28)	Delete the hyphen from "72-hour" and "[10]-day."
36	Appendix F (page F-3, lines 30 and 32)	Delete the hyphen from "[10]-day."
37	Appendix F (page F-3, line 36)	Insert "Tech Spec 3.8.1" after "ISTS."
38	Appendix F (page F-4, line 1)	Delete "LCO" and insert Tech Spec, and insert "Actions" after 3.8.1.
39	Appendix F (page F-4, lines 15 and 21)	Delete the hyphen from "[34]-hour."
40	Appendix F (page F-4, line 30)	Insert "Tech Spec 3.8.9" after "ISTS."
41	Appendix F (page F-4, lines 31 and 32)	Delete "required action" and insert "second CT."