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NRC ITS TRACKING

NRC Reviewer

ID	200510281131		Conference Call Requested? No	
Category	Discussion			
ITS Information	ITS Section: 5.0 ITS Number: BSI 7	DOC Number: L.4	JFD Number: None Bases JFD Number: None	Page Number(s): 101
Comment	This is a Beyond Scope Issue (TAC No. MC7610) You propose to delete CGCS from ITS 5.5.2, based upon the following: The Combustible Gas Control System is no longer required and has been removed from the Monticello Technical Specifications, and that this has been documented in License Amendment No. 138, dated May 21, 2004 (ADAMS Accession No. ML041180612). A plant modification is complete which removes all CGCS communication with primary containment. A plant modification is complete which removes Residual Heat Removal (RHR) System supply lines to the CGCS. The RHR system is included in ITS 5.5.2, but removing the RHR system from the CGCS removes any potential for highly radioactive fluid from entering CGCS via RHR. 1. In the application, it states that Technical Specification requirements governing the OPERABILITY of the Combustible Gas Control System (CGCS) have been previously removed. The Hydrogen Recombiner portion of the CGCS was removed from Technical Specifications; however, it appears much of the CGCS piping appears to still exist. The statement was also made that a plant modification was completed which removed all CGCS communication with primary containment. The Containment Atmosphere Monitoring System (CAMS) appears to still be available to place in service, and the CAMS appears to be part of the CGCS, in that the inlet and return lines tap off the 4" CGCS process line. Although the Hydrogen Recombiner portion of the CGCS may be retired in place, a portion of the CGCS still appears to communicate with primary containment and may still be subject to highly radioactive fluid, as in the case when the CAMS is placed in service post-accident. 1) Provide further clarification as to the status of the CGCS and the system current system interface with primary containment. 2) Provide justification as to how the CGCS may be completely removed from the proposed program requirements of ITS 5.5.2 if it may still be subject to potentially radioactive fluid. 2. If a proposed response to Question 1 is utilizing the ITS 5.5.2 requirement related to Process Sampling equipment monitoring, then 1) Is the CAMS being monitored as part of your CTS 6.8.B program? 2) Will it be monitored under the proposed ITS 5.5.2 3. You state that the RHR system cooling water supply lines have been eliminated to the CGCS. If the CGCS supply valves (CGC-1-1 or CGC-1-2) are open or can re-opened, then it appears that the RHR system could potentially communicate with the CGCS. 1) Explain how the RHR supply line is eliminated and where is this isolation (the supply isolation valve or at the recombiner skid)? 2) Are CGC-1-1 and CGC-1-2 administratively controlled closed and/or another method used (i.e. a blank flange installed) for positive isolation? 4. What will be the process for maintaining the CGCS and associated RHR system configuration, such that any future modifications do not inadvertently impact this proposed change?			
Issue Date	10/28/2005			

Close Date		Resolution requires change to: None Docket Response Required? No

▶ Responses

Date Created: 10/28/2005 11:31 AM by Terry Beltz

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LICENSEE COMMENTS

ID	**200510281131** Validation Required? **No**
Response Submitted	**11/08/2005**
Comment	**Improved Technical Specification (ITS) 5.5 Discussion of Changes (DOC) L.4 (Attachment 1, Volume 17, Rev. 0, Page 76 of 143) states that a plant modification has been completed that removes all communication between the Combustible Gas Control System (CGCS) and the containment and eliminated the Residual Heat Removal (RHR) System cooling water supply lines to the CGCS. This plant modification was documented under Modification Procedure 03Q145, and the piping modifications were performed during refueling outage RF022. The CGCS inlet and return lines piping was cut and capped on the containment side of the Containment Atmosphere Monitoring System (CAMS) sample connection points. The RHR System cooling water supply lines were cut on the CGCS side of valves CGC-1-1 and CGC-1-2. Furthermore, a high point vent connection was added to the RHR System just downstream of CGC-1-1 and CGC-1-2 (and the valves were redesignated as RHR System valves) and two vent valves were added and the vent capped.** **In addition, during the development of the Monticello response to this question, it was noted that the Current Technical Specifications (CTS) Markup page associated with this change was not correctly annotated. The words "Combustible Gas Control," in CTS 6.8.B (Page 55 of 143) should have been deleted and annotated with DOC L.4. This will be corrected as shown in the attachment to this response.**

Date Created: 11/08/2005 04:57 PM by Jerry Jones
Last Modified: 11/08/2005 05:00 PM

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5.5.2 B. Primary Coolant Sources Outside Containment

5.5.2 This program provides controls to minimize leakage from those portions of systems outside containment that could contain highly radioactive fluids during a serious transient or accident to levels as low as practicable. The systems include Core Spray, High Pressure Coolant Injection, Residual Heat Removal, Reactor Core Isolation Cooling, Combustible Gas Control, process sampling, and Standby Gas Treatment. The program shall include the following:

L.4

5.5.2.a 1. Preventive maintenance and periodic visual inspection requirements; and

24 months — L.5

5.5.2.b 2. Integrated leak test requirements for each system at refueling cycle intervals or less.

5.5.2 The provisions of Specification 4.0.B are applicable.

A program acceptable to the Commission was described in a letter dated December 31, 1979, from L O Mayer, NSP, to Director of Nuclear Reactor Regulation, "Lessons Learned Implementation." — A.2

C. (Deleted)

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Attachment 1, Volume 17, Rev. 0, Page 55 of 143