

ENCLOSURE 2

TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT (WBN)
UNIT 1

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-98-014
MARKED-UP PAGES

I. **AFFECTED PAGE LIST**

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II. **MARKED PAGES**

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B 3.6-78

SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.11.2 Verify total weight of stored ice is $\geq 2,403,800$ lb by:</p> <ul style="list-style-type: none"> a. Weighing a representative sample of ≥ 144 ice baskets and verifying each basket contains ≥ 1236 lb of ice; and b. Calculating total weight of stored ice, at a 95% confidence level, using all ice basket weights determined in SR 3.6.11.2.a. 	<p>18 months</p>
<p>SR 3.6.11.3 Verify azimuthal distribution of ice at a 95% confidence level by subdividing weights, as determined by SR 3.6.11.2.a, into the following groups:</p> <ul style="list-style-type: none"> a. Group 1-bays 1 through 8; b. Group 2-bays 9 through 16; and c. Group 3-bays 17 through 24. <p>The average ice weight of the sample baskets in each group from radial rows 1, 2, 4, 6, 8, and 9 shall be ≥ 1236 lb.</p>	<p>18 months</p>
<p>SR 3.6.11.4 Verify, by visual inspection, accumulation of ice or frost on structural members comprising flow channels through the ice condenser is ≤ 0.38 inch thick.</p> <div style="border: 1px solid black; padding: 2px; display: inline-block; margin-left: 10px;">See Insert A</div>	<p>18 months</p>

(continued)

INSERT A

Verify, by visual inspection, accumulation of ice on structural members comprising flow channels through the ice bed is ≤ 15 percent blockage of the total flow area.

B 3:6 CONTAINMENT SYSTEMS

B 3.6.11 Ice Bed

BASES

1944

BACKGROUND

The ice bed consists of over 2,403,800 lb of ice stored in baskets within the ice condenser. Its primary purpose is to provide a large heat sink in the event of a release of energy from a Design Basis Accident (DBA) in containment. The ice would absorb energy and limit containment peak pressure and temperature during the accident transient. Limiting the pressure and temperature reduces the release of fission product radioactivity from containment to the environment in the event of a DBA.

The ice condenser is an annular compartment enclosing approximately 300° of the perimeter of the upper containment compartment, but penetrating the operating deck so that a portion extends into the lower containment compartment. The lower portion has a series of hinged doors exposed to the atmosphere of the lower containment compartment, which, for normal plant operation, are designed to remain closed. At the top of the ice condenser is another set of doors exposed to the atmosphere of the upper compartment, which also remain closed during normal plant operation. Intermediate deck doors, located below the top deck doors, form the floor of a plenum at the upper part of the ice condenser. These doors also remain closed during normal plant operation. The upper plenum area is used to facilitate surveillance and maintenance of the ice bed.

SEE
INSERT B

~~The ice baskets held in the ice bed within the ice condenser are arranged to promote heat transfer from steam to ice.~~
This arrangement enhances the ice condenser's primary function of condensing steam and absorbing heat energy released to the containment during a DBA.

In the event of a DBA, the ice condenser inlet doors (located below the operating deck) open due to the pressure rise in the lower compartment. This allows air and steam to flow from the lower compartment into the ice condenser. The resulting pressure increase within the ice condenser causes the intermediate deck doors and the top deck doors to open, which allows the air to flow out of the ice condenser into the upper compartment. Steam condensation within the ice condenser limits the pressure and temperature buildup in

(continued)

INSERT B

The ice baskets contain the ice within the ice condenser. The ice bed is considered to consist of the total volume from the bottom elevation of the ice baskets to the top elevation of the ice baskets. The ice baskets position the ice within the ice bed in an arrangement to promote heat transfer from steam to ice.

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.6.11.3

This SR ensures that the azimuthal distribution of ice is reasonably uniform, by verifying that the average ice weight in each of three azimuthal groups of ice condenser bays is within the limit. The Frequency of 18 months was based on ice storage tests and the allowance built into the required ice mass over and above the mass assumed in the safety analyses. Operating experience has verified that, with the 18 month Frequency, the weight requirements are maintained with no significant degradation between surveillances.

SR 3.6.11.4

See Insert C

~~This SR ensures that the flow channels through the ice condenser have not accumulated an excessive amount of ice or blockage. The visual inspection must be made for two or more flow channels per ice condenser bay and must include the following specific locations along the flow channel:~~

- ~~a. Past the lower inlet plenum support structures and turning vanes;~~
- ~~b. Between ice baskets;~~
- ~~c. Past lattice frames~~
- ~~d. Through the intermediate floor grating; and~~
- ~~e. Through the top deck floor grating.~~

~~The allowable 0.38 inch thick buildup of frost or ice is based on the analysis of containment response to a DBA with partial blockage of the ice condenser flow passages. If a flow channel in a given bay is found to have an accumulation of frost or ice > 0.38 inch thick, a representative sample of 20 additional flow channels from the same bay must be visually inspected.~~

~~If these additional flow channels are all found to be acceptable, the discrepant flow channel may be considered single, unique, and acceptable deficiency. More than one discrepant flow channel in a bay requires a more detailed evaluation to assess actual ice and frost blockage in regards to allowed accident analysis limits and the need for~~

(continued)

BASES

SURVEILLANCE
REQUIREMENTS

SR 3.6.11.4 (continued)

~~ice/frost removal.~~ These requirements are based on the sensitivity of the partial blockage analysis to additional blockage. The Frequency of 18 months was based on ice storage tests and the allowance built into the required ice mass over and above the mass assumed in the safety analyses.

SR 3.6.11.5

Verifying the chemical composition of the stored ice ensures that the stored ice has a boron concentration of at least 1800 ppm as sodium tetraborate and a high pH, ≥ 9.0 and ≤ 9.5 , in order to meet the requirement for borated water when the melted ice is used in the ECCS recirculation mode of operation. This is accomplished by obtaining at least nine representative ice samples. Representative samples are those taken approximately one foot from the top of each selected ice basket, with the selected baskets being distributed throughout the ice condenser. If the initial analysis results in an average pH value or an average boron concentration outside prescribed limits, then 55 additional randomly selected samples shall be analyzed. If either the average pH value or average boron concentration of the expanded sample is outside their prescribed limit(s), then entry into ACTION Condition A is required. Sodium tetraborate has been proven effective in maintaining the boron content for long storage periods, and it also enhances the ability of the solution to remove and retain fission product iodine. The high pH is required to enhance the effectiveness of the ice and the melted ice in removing iodine from the containment atmosphere. This pH range also minimizes the occurrence of chloride and caustic stress corrosion on mechanical systems and components exposed to ECCS and Containment Spray System fluids in the recirculation mode of operation. The Frequency of 18 months was developed considering these facts:

- a. Long term ice storage tests have determined that the chemical composition of the stored ice is extremely stable;
- b. Operating experience has demonstrated that meeting the boron concentration and pH requirements has never been a problem; and
- c. Someone would have to enter the containment to take the sample, and, if the unit is at power, that person would receive a radiation dose.

(continued)

INSERT C

This SR ensures that the air/steam flow channels through the ice bed have not accumulated ice blockage that exceeds 15 percent of the total flow area through the ice bed region. The allowable 15 percent buildup of ice is based on the analysis of the subcompartment response to a design basis LOCA with partial blockage of the ice bed flow channels. The analysis did not perform detailed flow area modeling, but rather lumped the ice condenser bays into six sections ranging from 2.75 bays to 6.5 bays. Individual bays are acceptable with greater than 15 percent blockage, as long as 15 percent blockage is not exceeded for any analysis section.

To provide a 95 percent confidence that flow blockage does not exceed the allowed 15 percent, the visual inspection must be made for at least 54 (33 percent) of the 162 flow channels per ice condenser bay. The visual inspection of the ice bed flow channels is to inspect the flow area, by looking down from the top of the ice bed, and where view is achievable up from the bottom of the ice bed. Flow channels to be inspected are determined by random sample. As the most restrictive flow passage location is found at a lattice frame elevation, the 15 percent blockage criteria only applies to "flow channels" that comprise the area:

- a. between ice baskets, and
- b. past lattice frames and wall panels.

Due to a significantly larger flow area in the regions of the upper deck grating and the lower inlet plenum and turning vanes, it would require a gross buildup of ice on these structures to obtain a degradation in air/steam flow. Therefore, these structures are excluded as part of a flow channel for application of the 15 percent blockage criteria. Plant and industry experience have shown that removal of ice from the excluded structures during the refueling outage is sufficient to ensure they remain operable throughout the operating cycle. Thus, removal of any gross ice buildup on the excluded structures is performed following outage maintenance activities.

Operating experience has demonstrated that the ice bed is the region that is the most flow restrictive, due to the normal presence of ice accumulation on lattice frames and wall panels. The flow area through the ice basket support platform is not a more restrictive flow area because it is easily accessible from the lower plenum and is maintained clear of ice accumulation. There is not a mechanistically credible method for ice to accumulate on the ice basket support platform during plant operation. Plant and industry experience has shown that the vertical flow area through the ice basket support platform remains clear of ice accumulation that could produce blockage. Normally only a glaze may develop or exist on the ice basket support platform which is not significant to blockage of flow area. Additionally, outage maintenance practices provide measures to clear the ice basket support platform following maintenance activities of any accumulation of ice that could block flow areas.

Frost buildup or loose ice is not to be considered as flow channel blockage, whereas attached ice is considered blockage of a flow channel. Frost is the solid form of water that is loosely adherent, and can be brushed off with the open hand.

BASES

ACTIONS
(continued)

A.1

If one or more ice condenser inlet doors are inoperable due to being physically restrained from opening, the door(s) must be restored to OPERABLE status within 1 hour. The Required Action is necessary to return operation to within the bounds of the containment analysis. The 1 hour Completion Time is consistent with the ACTIONS of LCO 3.6.1, "Containment," which requires containment to be restored to OPERABLE status within 1 hour.

B.1 and B.2

If one or more ice condenser doors are determined to be partially open or otherwise inoperable for reasons other than Condition A or if a door is found that is not closed, it is acceptable to continue plant operation for up to 14 days, provided the ice bed temperature instrumentation is monitored once per 4 hours to ensure that the open or inoperable door is not allowing enough air leakage to cause the maximum ice bed temperature to approach the melting point. The Frequency of 4 hours is based on the fact that temperature changes cannot occur rapidly in the ice bed because of the large mass of ice involved. The 14 day Completion Time is based on long term ice storage tests that indicate that if the temperature is maintained below 27°F, there would not be a significant loss of ice from sublimation. If the maximum ice bed temperature is > 27°F at any time, or ice bed temperature is not verified to be within the specified Frequency as augmented by the provisions of SR 3.0.2, the situation reverts to Condition C and a Completion Time of 48 hours is allowed to restore the inoperable door to OPERABLE status or enter into Required Actions D.1 and D.2.

See Insert D

C.1

If Required Actions or Completion Times of B.1 or B.2 are not met, the doors must be restored to OPERABLE status and closed positions within 48 hours. The 48 hour Completion Time is based on the fact that, with the very large mass of ice involved, it would not be possible for the temperature to decrease to the melting point and a significant amount of ice to melt in a 48 hour period.

(continued)

INSERT D

[Note: Entry into Condition B is not required due to personnel standing on or opening an intermediate deck or upper deck door for short durations to perform required surveillances, minor maintenance such as ice removal, or routine tasks such as system walkdowns.]

TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT (WBN)
UNIT 1

PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS- 98-014
REVISED PAGES

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B 3.6-78

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SURVEILLANCE REQUIREMENTS (continued)

SURVEILLANCE	FREQUENCY
<p>SR 3.6.11.2 Verify total weight of stored ice is $\geq 2,403,800$ lb by:</p> <p>a. Weighing a representative sample of ≥ 144 ice baskets and verifying each basket contains ≥ 1236 lb of ice; and</p> <p>b. Calculating total weight of stored ice, at a 95% confidence level, using all ice basket weights determined in SR 3.6.11.2.a.</p>	<p>18 months</p>
<p>SR 3.6.11.3 Verify azimuthal distribution of ice at a 95% confidence level by subdividing weights, as determined by SR 3.6.11.2.a, into the following groups:</p> <p>a. Group 1-bays 1 through 8;</p> <p>b. Group 2-bays 9 through 16; and</p> <p>c. Group 3-bays 17 through 24.</p> <p>The average ice weight of the sample baskets in each group from radial rows 1, 2, 4, 6, 8, and 9 shall be ≥ 1236 lb.</p>	<p>18 months</p>
<p>SR 3.6.11.4 Verify, by visual inspection, accumulation of ice on structural members comprising flow channels through the ice bed is ≤ 15 percent blockage of the total flow area.</p>	<p>18 months</p>

(continued)

B 3.6 CONTAINMENT SYSTEMS

B 3.6.11 Ice Bed

BASES

BACKGROUND

The ice bed consists of over 2,403,800 lb of ice stored in 1944 baskets within the ice condenser. Its primary purpose is to provide a large heat sink in the event of a release of energy from a Design Basis Accident (DBA) in containment. The ice would absorb energy and limit containment peak pressure and temperature during the accident transient. Limiting the pressure and temperature reduces the release of fission product radioactivity from containment to the environment in the event of a DBA.

The ice condenser is an annular compartment enclosing approximately 300° of the perimeter of the upper containment compartment, but penetrating the operating deck so that a portion extends into the lower containment compartment. The lower portion has a series of hinged doors exposed to the atmosphere of the lower containment compartment, which, for normal plant operation, are designed to remain closed. At the top of the ice condenser is another set of doors exposed to the atmosphere of the upper compartment, which also remain closed during normal plant operation. Intermediate deck doors, located below the top deck doors, form the floor of a plenum at the upper part of the ice condenser. These doors also remain closed during normal plant operation. The upper plenum area is used to facilitate surveillance and maintenance of the ice bed.

The ice baskets contain the ice within the ice condenser. The ice bed is considered to consist of the total volume from the bottom elevation of the ice baskets to the top elevation of the ice baskets. The ice baskets position the ice within the ice bed in an arrangement to promote heat transfer from steam to ice. This arrangement enhances the ice condenser's primary function of condensing steam and absorbing heat energy released to the containment during a DBA.

In the event of a DBA, the ice condenser inlet doors (located below the operating deck) open due to the pressure rise in the lower compartment. This allows air and steam to flow from the lower compartment into the ice condenser. The resulting pressure increase within the ice condenser causes the intermediate deck doors and the top deck doors to open, which allows the air to flow out of the ice condenser into

(continued)

BASES

BACKGROUND
(continued)

the upper compartment. Steam condensation within the ice condenser limits the pressure and temperature buildup in containment. A divider barrier separates the upper and lower compartments and ensures that the steam is directed into the ice condenser.

The ice, together with the containment spray, is adequate to absorb the initial blowdown of steam and water from a DBA and the additional heat loads that would enter containment during several hours following the initial blowdown. The additional heat loads would come from the residual heat in the reactor core, the hot piping and components, and the secondary system, including the steam generators. During the post blowdown period, the Air Return System (ARS) returns upper compartment air through the divider barrier to the lower compartment. This serves to equalize pressures in containment and to continue circulating heated air and steam from the lower compartment through the ice condenser where the heat is removed by the remaining ice.

As ice melts, the water passes through the ice condenser floor drains into the lower compartment. Thus, a second function of the ice bed is to be a large source of borated water (via the containment sump) for long term Emergency Core Cooling System (ECCS) and Containment Spray System heat removal functions in the recirculation mode.

A third function of the ice bed and melted ice is to remove fission product iodine that may be released from the core during a DBA. Iodine removal occurs during the ice melt phase of the accident and continues as the melted ice is sprayed into the containment atmosphere by the Containment Spray System. The ice is adjusted to an alkaline pH that facilitates removal of radioactive iodine from the containment atmosphere. The alkaline pH also minimizes the occurrence of the chloride and caustic stress corrosion on mechanical systems and components exposed to ECCS and Containment Spray System fluids in the recirculation mode of operation.

It is important for the ice to be uniformly distributed around the 24 ice condenser bays and for open flow paths to exist around ice baskets. This is especially important during the initial blowdown so that the steam and water mixture entering the lower compartment do not pass through only part of the ice condenser, depleting the ice there while bypassing the ice in other bays.

(continued)

BASES

SURVEILLANCE
REQUIREMENTS
(continued)

SR 3.6.11.3

This SR ensures that the azimuthal distribution of ice is reasonably uniform, by verifying that the average ice weight in each of three azimuthal groups of ice condenser bays is within the limit. The Frequency of 18 months was based on ice storage tests and the allowance built into the required ice mass over and above the mass assumed in the safety analyses. Operating experience has verified that, with the 18 month Frequency, the weight requirements are maintained with no significant degradation between surveillances.

SR 3.6.11.4

This SR ensures that the air/steam flow channels through the ice bed have not accumulated ice blockage that exceeds 15 percent of the total flow area through the ice bed region. The allowable 15 percent buildup of ice is based on the analysis of the subcompartment response to a design basis LOCA with partial blockage of the ice bed flow channels. The analysis did not perform detailed flow area modeling, but rather lumped the ice condenser bays into six sections ranging from 2.75 bays to 6.5 bays. Individual bays are acceptable with greater than 15 percent blockage, as long as 15 percent blockage is not exceeded for any analysis section.

To provide a 95 percent confidence that flow blockage does not exceed the allowed 15 percent, the visual inspection must be made for at least 54 (33 percent) of the 162 flow channels per ice condenser bay. The visual inspection of the ice bed flow channels is to inspect the flow area, by looking down from the top of the ice bed, and where view is achievable up from the bottom of the ice bed. Flow channels to be inspected are determined by random sample. As the most restrictive flow passage location is found at a lattice frame elevation, the 15 percent blockage criteria only applies to "flow channels" that comprise the area:

- a. between ice baskets, and
- b. past lattice frames and wall panels.

Due to a significantly larger flow area in the regions of the upper deck grating and the lower inlet plenum and turning vanes, it would require a gross buildup of ice on these structures to obtain a degradation in air/steam flow. Therefore, these structures are excluded as part of a flow channel for application of the 15 percent blockage criteria. Plant and industry experience have shown that removal of ice from the excluded structures during the refueling outage is sufficient to ensure they remain operable throughout the

(continued)

BASES

SURVEILLANCE
REQUIREMENTSSR 3.6.11.4 (continued)

operating cycle. Thus, removal of any gross ice buildup on the excluded structures is performed following outage maintenance activities.

Operating experience has demonstrated that the ice bed is the region that is the most flow restrictive, due to the normal presence of ice accumulation on lattice frames and wall panels. The flow area through the ice basket support platform is not a more restrictive flow area because it is easily accessible from the lower plenum and is maintained clear of ice accumulation. There is not a mechanistically credible method for ice to accumulate on the ice basket support platform during plant operation. Plant and industry experience has shown that the vertical flow area through the ice basket support platform remains clear of ice accumulation that could produce blockage. Normally only a glaze may develop or exist on the ice basket support platform which is not significant to blockage of flow area. Additionally, outage maintenance practices provide measures to clear the ice basket support platform following maintenance activities of any accumulation of ice that could block flow areas.

Frost buildup or loose ice is not to be considered as flow channel blockage, whereas attached ice is considered blockage of a flow channel. Frost is the solid form of water that is loosely adherent, and can be brushed off with the open hand.

The Frequency of 18 months was based on ice storage tests and the allowance built into the required ice mass over and above the mass assumed in the safety analyses.

SR 3.6.11.5

Verifying the chemical composition of the stored ice ensures that the stored ice has a boron concentration of at least 1800 ppm as sodium tetraborate and a high pH, ≥ 9.0 and ≤ 9.5 , in order to meet the requirement for borated water when the melted ice is used in the ECCS recirculation mode of operation. This is accomplished by obtaining at least nine representative ice samples. Representative samples are those taken approximately one foot from the top of each selected ice basket, with the selected baskets being distributed throughout the ice condenser. If the initial analysis results in an average pH value or an average boron concentration outside prescribed limits, then 55 additional randomly selected samples shall be analyzed. If either the average pH value or average boron concentration of the expanded sample is outside their prescribed limit(s), then

(continued)

BASES

SURVEILLANCE
REQUIREMENTSSR 3.6.11.5 (continued)

entry into ACTION Condition A is required. Sodium tetraborate has been proven effective in maintaining the boron content for long storage periods, and it also enhances the ability of the solution to remove and retain fission product iodine. The high pH is required to enhance the effectiveness of the ice and the melted ice in removing iodine from the containment atmosphere. This pH range also minimizes the occurrence of chloride and caustic stress corrosion on mechanical systems and components exposed to ECCS and Containment Spray System fluids in the recirculation mode of operation. The Frequency of 18 months was developed considering these facts:

- a. Long term ice storage tests have determined that the chemical composition of the stored ice is extremely stable;
- b. Operating experience has demonstrated that meeting the boron concentration and pH requirements has never been a problem; and
- c. Someone would have to enter the containment to take the sample, and, if the unit is at power, that person would receive a radiation dose.

SR 3.6.11.6

This SR ensures that a representative sampling of ice baskets, which are relatively thin walled, perforated cylinders, have not been degraded by wear, cracks, corrosion, or other damage. Each ice basket must be raised at least 10 feet for this inspection. However, for baskets where vertical lifting height is restricted due to overhead obstruction, a camera shall be used to perform the inspection. The Frequency of 40 months for a visual inspection of the structural soundness of the ice baskets is based on engineering judgment and considers such factors as the thickness of the basket walls relative to corrosion rates expected in their service environment and the results of the long term ice storage testing.

REFERENCES

1. Watts Bar FSAR, Section 6.2, "Containment Systems"
2. Title 10, Code of Federal Regulations, Part 50, Appendix K, "ECCS Evaluation Models"

BASES

ACTIONS
(continued)A.1

If one or more ice condenser inlet doors are inoperable due to being physically restrained from opening, the door(s) must be restored to OPERABLE status within 1 hour. The Required Action is necessary to return operation to within the bounds of the containment analysis. The 1 hour Completion Time is consistent with the ACTIONS of LCO 3.6.1, "Containment," which requires containment to be restored to OPERABLE status within 1 hour.

B.1 and B.2

If one or more ice condenser doors are determined to be partially open or otherwise inoperable for reasons other than Condition A or if a door is found that is not closed, it is acceptable to continue plant operation for up to 14 days, provided the ice bed temperature instrumentation is monitored once per 4 hours to ensure that the open or inoperable door is not allowing enough air leakage to cause the maximum ice bed temperature to approach the melting point. The Frequency of 4 hours is based on the fact that temperature changes cannot occur rapidly in the ice bed because of the large mass of ice involved. The 14 day Completion Time is based on long term ice storage tests that indicate that if the temperature is maintained below 27°F, there would not be a significant loss of ice from sublimation. If the maximum ice bed temperature is > 27°F at any time, or ice bed temperature is not verified to be within the specified Frequency as augmented by the provisions of SR 3.0.2, the situation reverts to Condition C and a Completion Time of 48 hours is allowed to restore the inoperable door to OPERABLE status or enter into Required Actions D.1 and D.2. [Note: entry into Condition B is not required due to personnel standing on or opening an intermediate deck or upper deck door for short durations to perform required surveillances, minor maintenance such as ice removal, or routine tasks such as system walkdowns.]

C.1

If Required Actions or Completion Times of B.1 or B.2 are not met, the doors must be restored to OPERABLE status and closed positions within 48 hours. The 48 hour Completion Time is based on the fact that, with the very large mass of ice involved, it would not be possible for the temperature to decrease to the melting point and a significant amount of ice to melt in a 48 hour period.

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ENCLOSURE 4

**TENNESSEE VALLEY AUTHORITY
WATTS BAR NUCLEAR PLANT (WBN)
UNIT 1**

**PROPOSED TECHNICAL SPECIFICATION (TS) CHANGE TS-98-014
COMMITMENTS**

1. Plant procedures will require a 100 percent inspection and evaluation for any gross ice buildup on the excluded structures, and the removal of identified ice.