

South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

February 12, 2008 ABR-AE-08000026

U. S. Nuclear Regulatory Commission Attention: Document Control Desk One White Flint North 11555 Rockville Pike Rockville, MD 20852-2738

#### South Texas Project Units 3 and 4 Docket No. 52-012 and 52-013 Technical Specification Brackets Commitment Closure

Reference:

Letter, M. A. McBurnett to D. B. Matthews, "Resolution of Docketing Issues" dated December 20, 2007 (ABR–AE-07000014)

The referenced letter identified a commitment associated with the resolution of Technical Specification bracketed information, which stated:

By February 15, 2008, STPNOC will submit a letter to the NRC that will:

- Identify which bracketed information in the generic Technical Specifications is the subject of DAC (such as setpoints, which are the subject of DAC 3.4.13) and which are not the subject of DAC; and
- For bracketed information that is not the subject of DAC, STPNOC will provide a schedule and have further discussion with the NRC.

Attachment 1 provides the discussion and schedule specified in Commitment 9 of the referenced letter regarding the Technical Specification bracketed information. Attachments 2 (Technical Specifications) and 3 (Technical Specification Bases) list all of the bracketed information and identify that which is the subject of Design Acceptance Criteria (DAC). Attachment 4 identifies the non-DAC bracketed items for which preliminary values have not been provided. Attachment 5 tabulates commitments made in this letter. This letter completes Commitment 9 from the referenced letter.

STI 32264105

N (RT

If there are any questions regarding the resolution of this commitment, please contact Bill Mookhoek at 361-972-7274 or myself at (361) 972-4626.

M

G. T. Gibson Manager, Regulatory Affairs

Attachments:

- 1. Closure of Commitment 9 associated with Technical Specification Brackets
- 2. Technical Specification Bracketed Information
- 3. Technical Specification Bases Bracketed Information
- 4. Non-DAC Brackets with no Preliminary Values
- 5. Commitments

STI 32264105

r

cc: w/o attachment except \*

(paper copy)

Director, Office of New Reactors U. S. Nuclear Regulatory Commission One White Flint North 11555 Rockville Pike Rockville, MD 20852-2738

Regional Administrator, Region IV U. S. Nuclear Regulatory Commission 611 Ryan Plaza Drive, Suite 400 Arlington, Texas 76011-8064

Richard A. Ratliff Bureau of Radiation Control Texas Department of State Health Services 1100 West 49th Street Austin, TX 78756-3189

C. M. Canady City of Austin Electric Utility Department 721 Barton Springs Road Austin, TX 78704

\*Steven P. Frantz, Esquire Morgan, Lewis & Bockius LLP 1111 Pennsylvania Ave. NW Washington, DC 20004

\*George F. Wunder Two White Flint North 11455 Rockville Pike Mail Stop 7 F31 Rockville, MD 20852-2738 (electronic copy)

A. H. Gutterman, Esquire Morgan, Lewis & Bockius LLP

Loren R. Plisco U. S. Nuclear Regulatory Commission

Thad Hill Marty Ryan Robert Bailey Steve Winn Eddy Daniels NRG South Texas 3/4 LLC

Jon C. Wood, Esquire Cox Smith Matthews

C. Kirksey City of Austin

J. J. Nesrsta R. K. Temple Kevin Pollo L. D. Blaylock CPS Energy

. ..

STI 32264105

. . .

#### **Closure of Commitment 9 associated with Technical Specification Brackets**

#### **Issue 6**

Technical Specifications: The COL application Technical Specification and Technical Specification Bases contain a large quantity of bracketed information and a significant number of empty brackets. Though some of this information (e.g., that associated with design acceptance criteria) is not available, much of the bracketed information will be required before issuance of a COL. Without this information, the staff cannot determine whether or not the application meets the requirements of 10 CFR Part 52 Appendix A,IV.A.2.c for COL information Item 16-1, neither can we determine whether or not the Technical Specifications meet the requirements of 10 CFR 50.36.

#### **Response:**

There are 395 bracketed items remaining to be closed in the Technical Specifications (265 items) and the Technical Specification Bases (130 items), many of which are duplicates (Attachments 2 and 3). STP Nuclear Operating Company believes that 169 of the overall 395 bracketed items are associated with and determined through Design Acceptance Criteria (DAC). The bracketed information for these 169 items is determined following equipment specification, purchase, installation and/or testing. These include instrument settings for which the instrument setpoint methodology must be applied (ITAAC Table 3.4, item 13), and electrical equipment for which the analysis and testing of the as-built electrical system must be performed (ITAAC Table 2.12.1, item 22). These items are identified as "DAC" in Attachments 2 and 3. STP Nuclear Operating Company requests that these 169 DAC-related items be included in a License Condition to be completed one year prior to fuel load.

Of the remaining 226 bracketed items, 127 contain a value that must be verified, leaving 99 non-DAC items that do not contain a preliminary value. Of the 99 that do not contain a preliminary value (Attachment 4), 10 are associated with control rod scram times, 11 involve an analysis to allow fewer than 9 RIPs to be in operation (this allowance will likely not be needed for the STP ABWRs), 17 are dependent upon the design and size of the emergency diesel generators, 25 are battery cell parameters, 10 involve parameters to be specified in the Ventilation Filter Testing Program and 15 relate to the version of the various ASTM standards used for fuel oil sampling and testing. The remaining 11 involve UHS levels, air leakage testing parameters, topical report numbers, etc.

STP Nuclear Operating Company will provide preliminary values for all 99 of the non-DAC bracketed items that do not contain preliminary values by August 15, 2008, [Commitment 1] and will provide final values for all 226 of the non-DAC bracketed items by March 31, 2010 [Commitment 2]. Final input and verification of the 169 DAC bracketed items will be provided one year prior to fuel load in accordance with a license condition to be issued by the NRC.

د د د د د د د د د

#### ABR-AE-08000026 Attachment 2 1 of 14

ŕ

# **Technical Specification Bracketed Information**

Section	Item	Function	[Required Information]	# of Brackets	DAC?	Value Provided
3.1.3	SR 3.1.3.4		Verify each control rod scram time from fully withdrawn to 60% rod insertion position is ≤ [] seconds.	1	No	No
3.1.4	LCO 3.1.4(a)	· · · · · · · · · · · · · · · · · · ·	No more than [8] OPERABLE control rods shall be "slow," in accordance with Table 3.1.4-1;	1	No	Yes
3.1.4	Table 3.1.4-1, Note 2 <sup>-</sup>		Enter applicable Conditions and Required Actions of LCO 3.1.3, "Control Rod Operability," for control rods with scram times > [] seconds to 60% rod insertion position.	1	No	No
3.1.4	Table 3.1.4-1		[Control Rod Scram Times] for various ROD POSITION PERCENT INSERTIONS (%) at two different steam dome pressures. (6 brackets)	6	No	No
3.1.7	Figure 3.1.7-1		Temperature limit for SLC Pump Operation to be determined by COL Applicant [54.4 °C]	1	No	Yes
3.3.1.1	LCO 3.3.1	Required Action A.2.2.2, Note 2	Division of sensor bypass or NMS bypass is allowed for [6] hours for restoring channel to OPERABLE status.	1	No	Yes
3.3.1.1	SR 3.3.1.1.2		Verify the absolute difference between the average power range monitor (APRM) channels and the calculated power is ≤ 2% RTP. Frequency - [7] days	. 1	Yes	Yes
3.3.1.1	SR 3.3.1.1.3	Perform DIVISION FUNCTIONAL TEST	Frequency - [7] days	1	No	Yes
3.3.1.1	SR 3.3.1.1.4	Perform DIVISION FUNCTIONAL TEST	Frequency - [32] days	1	No	Yes
3.3.1.1	SR 3.3.1.1.5	Perform DIVISION FUNCTIONAL TEST	Frequency - [92] days	1	No	Yes
3.3.1.1	SR 3.3.1.1.6	Perform CHANNEL FUNCTIONAL TEST	Frequency - [92] days	1	No	Yes
3.3.1.1	SR 3.3.1.1.8		Verify the SRNM and APRM channels overlap within at least 1/2 decade. Frequency - [7] days	1	No	Yes

ر

1 :

ABR-AE-08000026 Attachment 2 2 of 14

1

í

Section	ltem	Function	[Required Information]	# of Brackets	DAC?	Value Provided
3.3.1.1	Table 3.3.1.1-1	Function 1a - SRNM Neutron Flux – High	Allowable Value - ≤ []% RTP (2 brackets)	2	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 1b - SRNM Neutron Flux– Short Period	Allowable Value - ≤ [] Seconds (2 brackets)	2	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 1.c - SRNM ATWS Permissive	Allowable Value $- \leq [] RTP$ for $\geq [] min$	1 .	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 2.a - APRM Neutron Flux – High, Setdown	Allowable Value - ≤ []% RTP	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 2.b - APRM Simulated Thermal Power – High, Flow Biased	Allowable Value - ≤ [W + ]% RTP and ≤ [ ]% RTP	2	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 2.c - APRM Fixed Neutron Flux – High	Allowable Value - ≤ []% RTP	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 2.e - Rapid Core Flow Decrease	MODE - ≥ [80]% RTP	1	No	No
3.3.1.1	Table 3.3.1.1-1	Function 2.e - Rapid Core Flow Decrease	Allowable Value - ≥ []%/s	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 2.g - APRM ATWS ADS Permissive	Allowable Value - ≤ [] RTP for ≥ [] min	2	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 3.a - RPS Trip Initiation	Allowable Value - ≤ [] MPaG	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 3.b - Isolation Initiation	Allowable Value - ≤ [] MPaG	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 3.c - SLCS and FWRB Initiation	Allowable Value - ≤[]MPaG	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 4 - Reactor Steam Dome Pressure – Low (Injection Permissive)	Allowable Value - ≤[]MPaG	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 5 - Reactor Vessel Water Level – High, Level 8	Allowable Value - ≤[]cm	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 6.a - RPS Trip Initiation	Allowable Value - ≥ [] cm	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 6.b - Isolation	Allowable Value - ≥ [] cm	1	Yes	No

### ABR-AE-08000026 Attachment 2 3 of 14

## **Technical Specification Bracketed Information**

Section	Item	Function	[Required Information]	# of Brackets	DAC?	Value Provided
		Initiation				
3.3.1.1	Table 3.3.1.1-1	Function 7a. ESF Initiation	Allowable Value - ≥ [] cm	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 7bIsolation Initiation	Allowable Value - ≥[] cm	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 7c. SLCS and FWRB Initiation	Allowable Value - ≥[]cm	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 8a. ESF Initiation	Allowable Value - ≥[] cm	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 8b. Isolation Initiation	Allowable Value - ≥ [] cm	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 8c. ATWS ADS Inhibit	Allowable Value - ≥[]cm	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 9a. ADS A, CAMS A, LPFL A & LPFL C Initiation	Allowable Value - ≥ [ ] cm	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 9b. ADS B, Diesel Generator, RCW, CAMS B, & LPFL B Initiation	Allowable Value - ≥[]cm	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 9c. Isolation Initiation	Allowable Value - ≥ [] cm	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 10. Main Steam Isolation Valve - Closure	Allowable Value - ≤ []% closed	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 11a. RPS Initiation	Allowable Value - ≤ [] MPaG	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 11b. ESF Initiation	Allowable Value - ≤ [ ] MPaG	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 11c. Isolation	Allowable Value - ≤[]MPaG	1	Yes	· No
3.3.1.1	Table 3.3.1.1-1	Function 11d. Feedwater Line Break Mitigation Initiation	Allowable Value - ≤[]MPaG	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 12. CRD Water Header Charging Pressure - Low	Allowable Value - ≤[]MPaG	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 13. Turbine Stop Valve - Closure	MODE - ≥ [40]% RTP	1	No -	Yes
3.3.1.1	Table 3.3.1.1-1	Function 13. Turbine Stop Valve - Closure	Allowable Value - ≤ []% closed	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function14. Turbine Control Valve Fast Closure, Trip Oil Pressure – Low	MODE - ≥ [40]% RTP	1	No	Yes

÷

ABR-AE-08000026 Attachment 2 4 of 14 ÷-

Section	Item	Function	[Required Information]	# of Brackets	DAC?	Value Provided
3.3.1.1	Table 3.3.1.1-1	Function14. Turbine Control Valve Fast Closure, Trip Oil Pressure – Low	Allowable Value - ≥ [] MPaG oil pressure	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function15. Feedwater Line Differential Pressure - High	Allowable Value - ≤[]MPaD	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function16a. RPS Initiation	Allowable Value - ≤[]°C	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function16b. ESF Initiation	Allowable Value - ≤[]°C	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function17. Condensate Storage Tank Level - Low	Allowable Value - ≥[]cm	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function18. Suppression Pool Water Level - High	Allowable Value - ≥[]cm	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function19. Main Steam Line Pressure – Low	Allowable Value - ≤ [] MPaG	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 20. Main Steam Line Flow – High	Allowable Value - ≥[]kg/hr	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 21. Condenser Vacuum – Low	Allowable Value - ≥ [] MPaG	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 22. Main Steam Tunnel Temperature – High	Allowable Value - ≤[]°C	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 23. Main Turbine Area Temperature - High	Allowable Value - ≤ [] °C	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 24a. Reactor Building Area Exhaust Air Radiation - High	Allowable Value - ≤ [] gray	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 24b. Fuel Handling Area Exhaust Air Radiation - High	Allowable Value - ≤ [] gray	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 25. RCIC Steam Line Flow – High	Allowable Value - ≥ [] kg/hr	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 27. RCIC Equipment Area Temperature – High	Allowable Value - ≤[]°C	. 1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 28. RHR Area Temperature - High	Allowable Value - ≤[]°C	1	Yes	No

ABR-AE-08000026 Attachment 2 5 of 14 \_

2

Section	ltem	Function	[Required Information]	# of Brackets	DAC?	Value Provided
3.3.1.1	Table 3.3.1.1-1	Function 29. CUW Differential Flow – High	Allowable Value - ≤ [] Liters/min for ≤ [] Seconds	2	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 30. CUW Regenerative Heat Exchanger Area Temperature – High	Allowable Value - ≤[]°C	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 31. CUW non- regenerative Heat Exchanger Area Temperature – High	Allowable Value - ≤[]°C	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 32. CUW Equipment Area Temperature – High	Allowable Value - ≤[]°C	. 1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Function 33. CW/RSW Heat Exchanger Room Water Level – High	Allowable Value - ≤[]m	1	Yes	No
3.3.1.1	Table 3.3.1.1-1	Footnote b	Trip automatically bypassed within each SRNM and not required to be OPERABLE at reactor power levels ≤ [0.0001] % RTP.	1	No	Yes
3.3.1.1	Table 3.3.1.1-1	Footnote (c)1	Neutron flux oscillations within any OPRM cell have a period between [1.0] seconds and [3.5] seconds that persists for [10] cycles with a peak to peak amplitude of that is [10] % of point or greater.	4	Yes	Yes
3.3.1.1	Table 3.3.1.1-1	Footnote (c)2	Neutron flux oscillations within any OPRM cell that have a period between [0.31] and [2.2] seconds become larger than [30] % of point within [3] periods or oscillations with the specified period range that are greater than [10%] of point grow by [30] % of point within [3] cycles.	7	Yes	Yes
3.3.1.2	SR 3.3.1.2.1	Perform CHANNEL FUNCTIONAL TEST.	FREQUENCY - [7] days	1	No	Yes
3.3.1.2	SR 3.3.1.2.2	Perform DIVISION FUNCTIONAL TEST.	FREQUENCY - [92] days	1	No	Yes
3.3.1.2	SR 3.3.1.2.3	Perform CHANNEL FUNCTIONAL TEST.	FREQUENCY - [92] days	1	No	Yes

#### ABR-AE-08000026 Attachment 2 6 of 14

Section	Item	Function	[Required Information]	# of Brackets	DAC?	Value Provided
3.3.1.3	SR 3.3.1.3.1	Perform DIVISION FUNCTIONAL TEST.	FREQUENCY - [92] days	1	No	Yes
3.3.1.4	SR 3.3.1.4.3	Perform DIVISIONAL FUNCTIONAL TEST.	FREQUENCY - [92] days	1	No	Yes
3.3.1.4	Table 3.3.1.4-1	Function 1.a. LPFL Pump Discharge Pressure – High.	Allowable Value - ≥[]MPaG	1	Yes	No
3.3.1.4	Table 3.3.1.4-1	Function 1.b. LPFL Pump Discharge Flow – Low.	Allowable Value - ≤ [] liters per min	1	Yes	No
3.3.1.4	Table 3.3.1.4-1	Function 2.a. HPCF Pump Discharge Pressure – High.	Allowable Value - ≥[]MPaG	1	Yes	No
3.3.1.4	Table 3.3.1.4-1	Function 2.b. HPCF Pump Discharge Flow – Low.	Allowable Value - ≤ [] liters per min	1	Yes	No
3.3.1.4	Table 3.3.1.4-1	Function 2.c HPCF Pump Suction Pressure – Low.	Allowable Value - ≥[]MPaG	1	Yes	No
3.3.1.4	Table 3.3.1.4-1	Function 3.a RCIC Pump Discharge Pressure– High.	Allowable Value - ≥[]MPaG	1	Yes	No
3.3.1.4	Table 3.3.1.4-1	Function 3.b RCIC Pump Discharge Flow – Low.	Allowable Value - ≤ [] liters per min	1	Yes	No
3.3.1.4	Table 3.3.1.4-1	Function 4.d ADS Division I ECCS Pump Discharge Pressure – High (permissive)	Allowable Value - ≥[]MPaG	1	Yes	No
3.3.1.4	Table 3.3.1.4-1	Function 4.e ADS Division II ECCS Pump Discharge Pressure – High (permissive)	Allowable Value - ≥ [] MPaG	1	Yes	No
3.3.1.4	Table 3.3.1.4-1	Function 5.a Division I, II, & III Loss of Voltage – 4.16 kV.	Allowable Value $- \ge [] \lor and \le [] \lor for \ge [] s$ and $\le [] s$	4	Yes	No
3.3.1.4	Table 3.3.1.4-1	Function 5.b Division I, II, & III Degraded Voltage – 4.16 kV.	Allowable Value - ≥[]V and ≤[]V for ≥ []s and ≤[]s	4	Yes	No
3.3.1.4	Table 3.3.1.4-1	Function 7.d Division I, II, & III Loss of Voltage - 4.16 kV.	Allowable Value - ≥[] V and ≤[] V for ≥ [] s and ≤[] s	4	Yes	No
3.3.1.4	Table 3.3.1.4-1	Function 7.e Division I, II, & III Degraded Voltage - 4.16 kV.	Allowable Value $- \ge [] \lor$ and $\le [] \lor$ for $\ge [] $ s and $\le [] $ s	4	Yes	No

#### ABR-AE-08000026 Attachment 2 7 of 14

Section	Item	Function	[Required Information]	# of Brackets	DAC?	Value Provided
3.3.1.4	Table 3.3.1.4-1	Function 10.c Drywell Sump Drain LCW Radiation – High	Allowable Value - ≤ [] gray	1	Yes	No
3.3.1.4	Table 3.3.1.4-1	Function 10.d Drywell Sump Drain HCW Radiation - High	Allowable Value - ≤ [ ] gray	1	Yes	No
3.3.2.1	SR 3.3.2.1.4	Perform CHANNEL FUNCTIONAL TEST.	FREQUENCY - [7] days	1	No	Yes
3.3.2.1	SR 3.3.2.1.5	Perform CHANNEL FUNCTIONAL TEST.	FREQUENCY - [31] days	1	No	Yes
3.3.3.1	LCO 3.3.3.1	REQUIRED ACTION B.1	COMPLETION TIME - [30] days	1	No	Yes
3.3.3.1	SR 3.3.3.1.1	Verify the required data transmission path segments are OPERABLE.	FREQUENCY - [92] days	1	No	Yes
3.3.4.1	LCO 3.3.4.1	REQUIRED ACTION F.1	COMPLETION TIME - [24] hours	1	No	Yes
3.3.4.1	LCO 3.3.4.1	REQUIRED ACTION G.1	COMPLETION TIME - [2] hours	1	No	Yes
3.3.4.1	LCO 3.3.4.1	REQUIRED ACTION G.2	COMPLETION TIME - [2] hours	1	No	Yes
3.3.4.1	LCO 3.3.4.1	REQUIRED ACTION H.1	COMPLETION TIME - [24] hours	1	No	Yes
3.3.4.1	SR 3.3.4.1.2	Perform CHANNEL FUNCTIONAL TEST.	FREQUENCY - [92] days	1	No	Yes
3.3.4.1	Table 3.3.4.1-1	Function1. Feedwater Reactor Vessel Water Level - Low, Level 3.	Allowable Value - ≥ [ ] cm	1	Yes	No
3.3.4.1	Table 3.3.4.1-1	Function2. Reactor Water Vessel Level – Low, Level 2.	Allowable Value - ≥[] cm	1	Yes	No
3.3.4.1	Table 3.3.4.1-1	Function3. SB&PC Reactor Steam Dome Pressure – High.	Allowable Value - ≥[]MPaG	1	Yes	No
3.3.4.1	Table 3.3.4.1-1	Footnote a	Allowable Value - $\leq$ [ ] seconds for RIPs [C, G, & K].	2	Yes	No
3.3.4.2	SR 3.3.4.2.2	Perform CHANNEL FUNCTIONAL TEST.	FREQUENCY - [92] days	1	No	Yes
3.3.4.2	SR 3.3.4.2.3	Perform CHANNEL CALIBRATION.	The allowable value shall be ≤ [ ] inches.	1	Yes	No
3.3.5.1	LCO 3.3.5.1	REQUIRED ACTION A.1	COMPLETION TIME - [72] hours	1	No	Yes

ABR-AE-08000026 Attachment 2 8 of 14

Section	ltem	Function	[Required Information]	# of Brackets	DAC?	Value Provided
3.3.5.1	LCO 3.3.5.1	REQUIRED ACTION C.1	COMPLETION TIME - [72] hours	1	No	Yes
3.3.5.1	SR 3.3.5.1.1	Note	Not required to be performed until 1 hour after THERMAL POWER is > [30] % RTP.	1	No	Yes
3.3.5.1	SR 3.3.5.1.1	Perform CHANNEL FUNCTIONAL TEST.	FREQUENCY - [92] days	1	No	Yes
3.3.5.1	SR 3.3.5.1.2	Perform CHANNEL FUNCTIONAL TEST.	FREQUENCY - [92] days	1	No	Yes
3.3.5.1	SR 3.3.5.1.6	Perform CHANNEL CHECK of process parameter and setpoint inputs to the ATLM.	FREQUENCY - [24] hours	1	No	Yes
3.3.5.1	Table 3.3.5.1-1	Function 1.a. Automated Thermal Limit Monitor	APPLICABLE MODE [(a)]	1	No	Yes
3.3.5.1	Table 3.3.5.1-1	Footnote a	THERMAL POWER > [30] % RTP.	1	No	Yes
3.3.5.1	Table 3.3.5.1-1	Footnote b	With THERMAL POWER ≤ [10] % RTP.	1	No	Yes
3.3.6.1	SR 3.3.6.1.1	Perform CHANNEL CHECK.	FREQUENCY - [31] days	1	No	Yes
3.3.6.1	Table 3.3.6.1-1	Footnote c	When power is ≤ [10] % RTP	1	No	Yes
3.3.6.1	Table 3.3.6.1-1	Footnote d	When power is > [10] % RTP	1	No	Yes
3.3.6.2	SR 3.3.6.2.1	Perform CHANNEL CHECK	FREQUENCY - [31] days	1	No	Yes
3.3.7.1	SR 3.3.7.1.1	Perform CHANNEL CHECK	FREQUENCY - [24] hours	1	No	Yes
3.3.7.1	SR 3.3.7.1.2	Perform CHANNEL FUNCTIONAL TEST.	FREQUENCY - [92] days	1	No	Yes
3.3.7.1	Table 3.3.7.1-1	Function1. Control Room Ventilation Radiation Monitors	Allowable Value - ≤[]mGy/h	1	Yes	No
3.3.7.1	Table 3.3.7.1-1	Function 2. Emergency Filtration System Low Flow	Allowable Value - ≤[]kg/h	1	Yes	No
3.3.8.1	SR 3.3.8.1.1	Perform CHANNEL FUNCTIONAL TEST	FREQUENCY - [92] days	1	No	Yes
3.3.8.1	SR 3.3.8.1.2	Perform CHANNEL CALIBRATION	FREQUENCY - [92] days	1	No	Yes
3.3.8.1	SR 3.3.8.1.2	CHANNEL CALIBRATION	Allowable Value - a. Undervoltage: ≤ [108] VAC	1	Yes	Yes
3.3.8.1	SR 3.3.8.1.2	CHANNEL CALIBRATION	Allowable Value - b. Overvoltage: ≥ [132] VAC	1	Yes	Yes
3.3.8.1	SR 3.3.8.1.2	CHANNEL CALIBRATION	Allowable Value - c. Underfrequency: ≤ [57] Hz	1	Yes	Yes

#### ABR-AE-08000026 Attachment 2 9 of 14

Section	Item	Function	[Required information]	# of Brackets	DAC?	Value Provided
3.3.8.1	SR 3.3.8.1.2	CHANNEL CALIBRATION	Allowable Value - d. Overfrequency: ≥ [63] Hz	1	Yes	Yes
3.3.8.2	SR 3.3.8.2.1	Perform CHANNEL CHECK	FREQUENCY - [7] days	1	No	Yes
3.3.8.2	SR 3.3.8.2.2	Perform CHANNEL FUNCTIONAL TEST	FREQUENCY - [92] days	1	No	Yes
3.4.1	LCO 3.4.1	LCO	[OR(RIPs in operation - (a), (b), (c) below)]	1	No	Yes
3.4.1	LCO 3.4.1	LCO	[] RIPs may be in operation provided the following limits are applied when the associated LCO is applicable:	1	No	No
3.4.1	LCO 3.4.1	LCO	a. LCO 3.2.1, "AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)," limits specified in the COLR for [] RIPs in operation; and	1	No	No
3.4.1	LCO 3.4.1	LCO	b. LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)," limits specified in the COLR for [] RIPs in operation; and	1	No	No
3.4.1	LCO 3.4.1	LCO	c. LCO 3.3.1.1, "SSLC Sensor Instrumentation," Function 2.b (Average Power Range Monitors Flow Biased Simulated Thermal Power - High), Allowable Value of Table 3.3.1.1-1 is reset for operation with [] RIPs.	1	No	No
3.5.2.2	SR 3.5.2.2	Verify, for the required High Pressure Core Flooder (HPCF) subsystem, the:	b. Condensate storage tank water level is ≥ [ ].	1	Yes	No
3.6.1.2	SR 3.6.1.2.1	The acceptance criteria for air lock testing are:	<ul> <li>b. For each door, leakage rate is ≤ 0.01 La when</li> <li>the gap between the door seals is pressurized to ≥</li> <li>[] MPaG for at least 15 minutes.</li> </ul>	1	No	No
3.6.1.3	LCO 3.6.1.3	REQUIRED ACTION D.1 Restore leakage to within limit.	COMPLETION TIME - [4 hours except for main steam line isolation valve leakage <u>AND</u> 8 hours for main steam line isolation valve leakage]	1	No	Yes
3.6.1.3	[SR 3.6.1.3.6]	[Perform leakage rate testing for each primary containment purge valve with resilient seals.]	[184 days <u>AND</u> Once within 92 days after opening the valve]	3	No	Yes

ABR-AE-08000026 Attachment 2 10 of 14 .

Section	ltem	Function	[Required Information]	# of Brackets	DAC?	Value Provided
3.6.1.3	[SR 3.6.1.3.13]	[Verify each 500 mm primary containment purge valve is blocked to restrict the valve from opening > [50] %.]	[18 months]	3	No	Yes
3.6.1.3	SR 3.6.1.3.13	Verify each 500 mm primary containment purge valve is blocked to restrict the valve from opening	> [50] %.	. 1	No	Yes
3.7.1	SR 3.7.1.2	· · · ·	Verify the water level in each RSW pump well of the UHS basin is ≥ [] m.	1	No	No
3.7.1	SR 3.7.1.3		Verify the RSW water temperature at the inlet to the RCW/RSW heat exchangers is ≤ [33.3] °C.	1	No	Yes
3.7.2	SR 3.7.2.2		Verify the water level in each RSW pump well of the UHS basin is ≥ [] m.	1	No	No
3.7.2	SR 3.7.2.3		Verify the RSW water temperature at the inlet to the RCW/RSW heat exchangers is ≤ [33.3] °C.	1	No	Yes
3.7.2	SR 3.7.2.6		Verify each RCW/RSW division and associated UHS [cooling tower] division actuates on an actual or simulated initiation signal.	1	No	Yes
3.7.3	SR 3.7.3.2	· · · · · · · · · · · · · · · · · · ·	Verify the water level in each RSW pump well of the intake structure UHS basin is $\geq$ [] m.	1	No	No
3.7.3	SR 3.7.3.3		Verify the RSW water temperature at the inlet to the RCW/RSW heat exchangers is ≥ [33.3] °C.	1	No	Yes
3.7.3	SR 3.7.3.6		Verify each RCW/RSW division and associated UHS [cooling tower] division actuates on an actual or simulated initiation signal.	1	No	Yes
3.8.1	SR 3.8.1.2		Verify each DG starts from standby conditions and achieves steady state voltage $\geq$ [3744] V and $\leq$ [4576] V and frequency $\geq$ [58.8] Hz and $\leq$ [61.2] Hz.	4	Yes	Yes
3.8.1	SR 3.8.1.3		Verify each DG is synchronized and loaded and operates for $\geq$ 60 minutes at a load $\geq$ 7200 kW and $\leq$ [] kW.	1	Yes	No

ABR-AE-08000026 Attachment 2 11 of 14 .

.

## **Technical Specification Bracketed Information**

Section	Item	Function	[Required Information]	# of Brackets	DAC?	Value Provided
3.8.1	SR 3.8.1.4		Verify each day tank contains ≥ [] liters of fuel oil.	1	No	No
3.8.1	SR 3.8.1.7		Verify each DG starts from standby condition and achieves, in $\leq 20$ seconds, voltage $\geq [3744]$ V and $\leq [4576]$ V and frequency $\geq [58.8]$ Hz and $\leq [61.2]$ Hz.	4	Yes	Yes
3.8.1	SR 3.8.1.8		Verify manual transfer of the [unit power supply] from the normal offsite circuit to each required alternate offsite circuit.	1	No	Yes
3.8.1	SR 3.8.1.9	NOTES	[NOTES 1. This Surveillance shall not be performed in MODE 1 or 2. 2. Credit may be taken for unplanned events that satisfy this SR. ]	1	No	Yes
3.8.1	SR 3.8.1.9		a. Following load rejection, the frequency is ≤ [ ] Hz;	1	Yes	No
3.8.1	SR 3.8.1.9		b. Within 3 seconds following load rejection, the voltage is $\geq$ [3744] V and $\leq$ [4576] V; and	2	Yes	Yes
3.8.1	SR 3.8.1.10		Verify each DG operating at a power factor $\leq 0.9$ does not trip and voltage is maintained $\leq [] V$ during and following a load rejection of a load $\geq$ [5000] V and $\leq [] kW$ .	3	Yes	No (2) Yes (1)
3.8.1	SR 3.8.1.11	Verify on an actual or simulated loss of offsite power signal: c. DG auto-starts from standby condition and:	3. maintains steady state voltage $\geq$ [3744] V and $\leq$ [4576] V, 4. maintains steady state frequency $\geq$ [58.8] Hz and $\leq$ [61.2] Hz, and	4	Yes	Yes
3.8.1	SR 3.8.1.12	Verify on an actual or simulated Emergency Core Cooling System (ECCS) initiation signal each DG auto- starts from standby condition and:	a. In $\leq$ 20 seconds after auto-start and during tests, achieves voltage $\geq$ [3744] V and $\leq$ [4576] V; b. In $\leq$ 20 seconds after auto-start and during tests, achieves frequency $\geq$ [58.8] Hz and $\leq$ [61.2] Hz;	4	Yes	Yes
3.8.1	SR 3.8.1.14	Verify each DG operating at a power factor $\leq$ 0.9, operates for $\geq$ 24 hours:	b. For the remaining hours of the test loaded ≥ 7200 kW and ≤ [].	1	No	No

.

#### ABR-AE-08000026 Attachment 2 12 of 14

.

### **Technical Specification Bracketed Information**

Section	ltem	Function	[Required Information]	# of Brackets	DAC?	Value Provided
3.8.1	SR 3.8.1.15		Verify each DG starts and achieves, in $\leq 20$ seconds, voltage $\geq$ [3744] V and $\leq$ [4576] V and frequency $\geq$ [58.8] Hz and $\leq$ [61.2] Hz.	4	Yes	Yes
3.8.1	SR 3.8.1.19	Verify, on an actual or simulated loss of offsite power signal in conjunction with an actual or simulated ECCS initiation signal:	3. achieves steady state voltage $\geq$ [3744] V and $\leq$ [4576] V, 4. achieves steady state frequency $\geq$ [58.8] Hz and $\leq$ [61.2] Hz, and	4	Yes	Yes
3.8.1	SR 3.8.1.20		Verify, when started simultaneously from standby condition, each Division 1, 2, and 3 DG achieves, in $\leq 20$ seconds, voltage $\geq$ [3744] V and $\leq$ [4576] V and frequency $\geq$ [58.8] Hz and $\leq$ [61.2] Hz.	4	Yes	Yes
3.8.3	LCO 3.8.3	CONDITION A	One or more DGs with fuel oil level $< []$ liters and $\geq []$ liters in storage tank.	2	No	No
3.8.3	LCO 3.8.3	CONDITION B	One or more DGs with lube oil inventory < [] liters and $\geq$ [] liters.	2	No	No
3.8.3	LCO 3.8.3	CONDITION E	One or more DGs with pressure in at least one starting air receiver < [ ] kPaG and ≥ [ ] kPaG.	2	No	No
3.8.3	LCO 3.8.3	REQUIRED ACTION E.1	Restore starting air receiver pressure to ≥ [ ] kPaG.	1	No	No
3.8.3	SR 3.8.3.1		Verify each fuel oil storage tank contains ≥ [ ] liters.	1	No	No ·
3.8.3	SR 3.8.3.2		Verify lube oil inventory for each DG is $\geq$ [] liters.	1	No	No
3.8.3	SR 3.8.3.4		Verify each required DG air start receiver pressure is ≥ [ ] kPaG.	1	No	No
3.8.4	SR 3.8.4.1		Verify battery terminal voltage is ≥ [ ] V on float charge.	1	No	No
3.8.4	SR 3.8.4.2		Verify connection resistance is $\leq$ [] ohms for inter- cell connections, $\leq$ [] ohms for inter-rack connections, $\leq$ [] ohms for inter-tier connections, and $\leq$ [] ohms for terminal connections.	4	No	No

×.,

ABR-AE-08000026 Attachment 2 13 of 14

Section	ltem	Function	[Required Information]	# of Brackets	DAC?	Value Provided
3.8.4	SR 3.8.4.5		Verify connection resistance is $\leq$ [] ohms for inter- cell connections, $\leq$ [] ohms for inter-rack connections, $\leq$ [] ohms for inter-tier connections, and $\leq$ [] ohms for terminal connections.	4	No	No
3.8.4	SR 3.8.4.6		Verify each required battery charger supplies $\geq$ [] amps at $\geq$ 125 V for $\geq$ 12 hours.	1	No	No
3.8.6	SR 3.8.6.2	FREQUENCY	Once within 24 hours after battery discharge < [ ] V <u>AND</u> Once within 24 hours after battery Overcharge > [] V	2	No	No
3.8.6	Table 3.8.6-1	Specific Gravity	CATEGORY A: ≥ [] CATEGORY B: ≥ [] AND Average of all connected cells > [] CATEGORY C: Average of all connected cells ≥ []	4	No	No
3.8.6	Table 3.8.6-1	Footnote (c)	Or battery charging current is < [] amps when on float charge. This is acceptable only during a maximum of [] days following a battery recharge.	2	No	No
4.3.1	4.3.1.2	The new fuel storage racks are designed and shall be maintained with:	d. A nominal [approximately 16] cm center to center distance between fuel assemblies placed in storage racks.	1	No	Yes
5.5	5.5.2.7 a	Control Room Habitability System and Standby Gas Treatment System	[Flowrate]	2	No	No
5.5	5.5.2.7 b	Control Room Habitability System and Standby Gas Treatment System	[Flowrate]	2	No	No
5.5	5.5.2.7 d	Control Room Habitability System and Standby Gas Treatment System	[Delta P] and [Flowrate]	4	No	No
5.5	5.5.2.7 e	Control Room Habitability System and Standby Gas Treatment System	[Wattage]	2	No	No

#### ABR-AE-08000026 Attachment 2 14 of 14

Section	ltem	Function	[Required Information]	# of Brackets	DAC?	Value Provided
57	5.7.1.5 b	The analytical methods used to determine the core operating limits shall be those previously reviewed and approved by the NRC, specifically those described in the following documents:	[Identify the Topical Report(s) by number, title, date, and NRC staff approval document, or identify the staff Safety Evaluation Report for a plant specific methodology by NRC letter and date.]	1	No	No
5.7	5.7.1.6	The analytical methods used to determine the pressure and temperature limits including the heatup and cooldown rates shall be those previously reviewed and approved by the NRC in	[Topical Report(s), number, title, date, and NRC staff approval document, or staff safety evaluation report for a plant specific methodology by NRC letter and date].	1	No	No
				265		

. \*

#### ABR-AE-08000026 Attachment 3 1 of 7

## **Technical Specification Bases Bracketed Information**

۱

Section	ltem	[Required Information]	DAC?	Duplicated in TS	# of Brackets	Value Provided
3.1.3	SR 3.1.3.4	Verifying the scram time for each control rod to 60% rod insertion position is ≤ [] seconds provides	No	Yes	1	No
3.1.4	1.4         LCO 3.1.4         The scram times have a margin to allow up to [8.0] of the control have scram times that exceed the specified limits (i.e., "slow" cor rods)		No	Yes	. 1	Yes
3.1.4	LCO 3.1.4	Table 3.1.4-1 is modified by two Notes, which state control rods with scram times not within the limits of the Table are considered "slow" and that control rods with scram times > [] seconds to 60% rod insertion position are considered inoperable as required by SR 3.1.3.4.	No	Yes	1	No
3.2.3	References	1. [Non GE Fuel Analysis]. (LHGR for)	No 🐤	No	1	No
3.3.1.1	ASA, LCO, and APP 2.a	In addition, to provide adequate coverage of the entire core, at least [20] LPRM inputs are required for each APRM division	No	No	1	Yes
3.3.1.1	ASA, LCO, and APP 2.b	The thermal power time constant of < [7] seconds is based on the fuel heat transfer dynamics.	No	No	1	Yes
3.3.1.1	ASA, LCO, and APP 2.e	The Neutron Monitoring System Rapid Core Flow Decrease Function is required to be OPERABLE in MODE 1 when thermal power is greater than [80]% RTP	No	Yes	1	Yes
3.3.1.1	SR 3.3.1.1.2	The Frequency of once per [7] days is based on	No	Yes	1	Yes
3.3.1.1	SR 3.3.1.1.2	At $\leq$ 25% RTP, the Surveillance is required to have been satisfactorily performed within the last [7] days in accordance with SR 3.0.2.	No	Yes	1	Yes
3.3.1.1	SR 3.3.1.1.3	However, a relatively short surveillance interval of [7] days is used because	No	Yes	1	Yes
3.3.1.1	SR 3.3.1.1.4	The [31] day frequency is based on	No	Yes	1	Yes
3.3.1.1	SR 3.3.1.1.5 and 3.3.1.1.6	The [92] day frequency is based on	No	Yes	1	Yes
3.3.1. <u>1</u>	SR 3.3.1.1.8	A maximum frequency of [7] days is also provided so the SR may be skipped if less than [7] days has elapsed since the last transition to power less than 5% RTP. The maximum Frequency of [7] days is reasonable based on reliability of the SRNMs and APRMs.	No	Yes	3	Yes

#### ABR-AE-08000026 Attachment 3 2 of 7

Section	ltem	[Required Information]	DAC?	Duplicated in TS	# of Brackets	Value Provided
3.3.1.2	SR 3.3.1.2.1	However, a relatively short surveillance interval of [7] days is used since	No	Yes	1	Yes
3.3.1.2	SR 3.3.1.2.2	Therefore, the [92] day frequency provides	No	Yes	1	Yes
3.3.1.2	SR 3.3.1.2.3	Therefore, the [92] day frequency provides	No	Yes	1	Yes
3.3.1.3	SR 3.3.1.3.1	Therefore, the [92] day frequency provides	No	Yes	1	Yes
3.3.1.4	SR 3.3.1.4.3	Therefore, the [92] day frequency provides	No	Yes	1	Yes
3.3.2.1	Action E.1	Required Action E.2 modifies Required Action D.3 to require immediate initiation of action to restore one of the inoperable required SRNMs to OPERABLE status instead of requiring initiation of action within the former Completion Time of [7] days.	No	No	1	Yes
3.3.2.1	SR 3.3.2.1.1	However, a surveillance interval of [12] hours is used to provide	No	No	1	Yes
3.3.2.1	SR 3.3.2.1.4 and 3.3.2.1.5	SR 3.3.2.1.4 is required in MODE 5, and the [7] day Frequency ensures	No	Yes	1	Yes
3.3.2.1	SR 3.3.2.1.4 and 3.3.2.1.5	Since core reactivity changes do not normally take place in these modes, the Frequency has been extended from [7] days to [31] days. The [31] day Frequency is based on	No	Yes	3	Yes
3.3.3.1	SR 3.3.3.1.1	Therefore, a frequency of [92] days is adequate.	No	Yes	1	Yes
3.3.4.1	ACTIONS G.1 and G.2	The [2] hour Completion Time to implement the Required Actions is sufficient	No	Yes	1	Yes
3.3.4.1	ACTIONS H.1	Because of the low probability of an event requiring these Functions, [24] hours is provided	No	Yes	1	Yes
3.3.4.1	SR 3.3.4.1.2	The frequency of [92] days is based on	No	Yes	1	Yes
3.3.4.1	SR 3.3.4.1.7	However, a relatively short surveillance interval of [7] days is used since	No	No	1	Yes
3.3.4.2	SR 3.3.4.2.2	The Frequency of [92] days is based on	No	Yes	1	Yes
3.3.5.1	ASA, LCO, and APP 1.a	The ATLM is assumed to prevent the consequences of a Rod Withdrawal Error (RWE) event when operating with reactor power above [30%] RTP. Therefore the LPSP allowable value must be [30%] RTP or below to assure ATLM operability above [30%] RTP.	No	Yes	3	Yes

..

Section	ltem	[Required Information]	DAC?	Duplicated in TS	# of Brackets	Value Provided
3.3.5.1	ASA, LCO, and APP 1.b	Compliance with the GWSR, and therefore OPERABILITY of the RWM, is required in MODES 1 and 2 with THERMAL POWER below [10%] RTP. The LPSP Allowable Value must be [10%] RTP or above to ensure required operability of the RWM below [10%] RTP. When THERMAL POWER is above [10%] RTP there is no	No	Yes	4	Yes
3.3.5.1	ACTIONS A.1 and A.2	The [72] hour Completion Time for Action A.1 is based on	No	Yes	1	Yes
3.3.5.1	ACTION C.1	The [72] hour Completion Time is based on	No	Yes	1	Yes
3.3.5.1	SR 3.3.5.1.1 and 3.3.5.1.2	The [92] day frequencies are based on	No	Yes	1	Yes
3.3.5.1	SR 3.3.5.1.3 and 3.3.5.1.4	The Allowable Value for the LPSP is in the range of [10]% to [30]% RTP.	Yes	Yes	2	Yes
3.3.5.1	SR 3.3.5.1.6	A CHANNEL CHECK on the parameters is performed every [24] hours.	No	Yes	1	Yes
3.3.6.1	LCO	[For this plant, the PCIV position PAM instrumentation consists of the following:]	No	No	1	No
3.3.6.1	SR 3.3.6.1.1	Performance of a CHANNEL CHECK once every [31] days ensures Performance of the CHANNEL CHECK provides confidence that undetected outright channel failure is limited to [31] days. The high reliability of the devices used to implement the PAM functions provides confidence that failure of more than one channel of a given function in any [31] day interval is rare.	No	Yes	3	Yes
3.3.6.2	ACTION A.1	The Required Action is to restore the inoperable division of the Function to OPERABLE status within [90] days.	No	No	1	Yes
3.3.7.1	SR 3.3.7.1.1	Performance of the CHANNEL CHECK once every [24] hours ensures	No	Yes	1	Yes
3.3.7.1	SR 3.3.7.1.2	The Frequency of [92] days is based on requiring the Emergency Filtration train to operate for a specified duration every [92] days.	No	Yes	2	Yes
3.3.8.1	SR 3.3.8.1.1	The [92] day frequency is based on	No	Yes	1	Yes
3.3.8.2	SR 3.3.8.2.1	However, a surveillance interval of [7] days is used to provide confidence that gross failures that do not activate an annunciator or alarm will be detected within [7] days.	No	Yes	2	Yes
3.3.8.2	SR 3.3.8.2.2	The [92] day frequency is based on	No	Yes	1	Yes
	L		1			

#### ABR-AE-08000026 Attachment 3 4 of 7

Section	ltem	[Required Information]	DAC?	Duplicated in TS	# of Brackets	Value Provided
3.4.1	APPLICABLE SAFETY ANALYSES	A plant specific LOCA analysis may be performed assuming only [] operating RIPs. The transient analyses of DCD Tier 2, Chapter 15 may also be performed for [] RIPs in operationDuring operation with only [] RIPs, modification to theThe APLHGR and MCPR setpoints for [] RIPs in operation are to be specified in the COLR.	No	Yes	4	No
3.4.1	LCO	With only [] RIPs in operation, modifications to the required APLHGR limits	No	Yes	1	No
-3.4.1	REFERENCES	3. [Plant specific analysis for [] RIPs operating.]	No	No	2	No
3.4.2	SR 3.4.2.2	Adequate pressure at which this test is to be performed is [6.55] MPaG (the pressure recommended by the valve manufacturer).	No	No	1	Yes
3.4.2	SR 3.4.2.2	Therefore, this SR is modified by a Note that states the Surveillance is not required to be performed until 12 hours after reactor steam dome pressure is $\geq$ ([6.55] MPaG).	No	No	1	Yes
3.4.9	REFERENCES	7. [ABWR P/T Limit Methodology.]	No	Yes	1	No
3.5.1	SR 3.5.1.9	Adequate pressure at which this test is to be performed is [6.55 MPaG] (the pressure recommended by the valve manufacturer)].	No	No	1	Yes
3.5.1	SR 3.5.1.9	Therefore, this SR is modified by a Note that states the Surveillance is not required to be performed until 12 hours after reactor steam dome pressure is $\geq$ [6.55] MPaG.	No	No	. 1	Yes
3.5.2	SR 3.5.2.1 and 3.5.2.2	or the HPCF System is aligned to take suction from the CST and the CST contains ≥ [] liters of water, equivalent to [] m, ensures that the HPCF System can supply makeup water to the RPV.	Yes	Yes	2	No
3.6.1.1	APPLICABLE SAFETY ANALYSES	The maximum allowable leakage rate for the primary containment (La) is 0.5% by weight of the containment air per 24 hours at the calculated peak containment pressure (Pa) of 279.6 kPaG or []% by weight of the containment air per 24 hours at the reduced pressure of Pt of [] MPaG (Ref. 1).	No	No	2	No
3.6.1.2	SR 3.6.1.2.1	The acceptance criteria were established [during initial air lock and primary containment OPERABILITY testing].	No	Yes	1	Yes
3.6.1.3	SR 3.6.1.3.13	Verifying each 500 mm primary containment purge valve is blocked to restrict opening to $\leq$ [50] % is required to ensure	No	Yes	1	Yes

#### ABR-AE-08000026 Attachment 3 5 of 7

Section	Item	[Required Information]	DAC?	Duplicated in TS	# of Brackets	Value Provided
3.7.1	BACKGROUND	Following a DBA or transient, the RCW/RSW System [and UHS cooling tower fans] will operate automatically without operator action.	No	No	1	Yes
3.7.1	LCO	OPERABILITY of the UHS is based on a maximum RSW water temperature of [33.3]°C at the inlet to the RCW/RSW heat exchangers The maximum RSW water temperature of [33.3]°C will insure that the peak temperature at the inlet to the RCW/RSW heat exchangers will not exceed	No	Yes	2	Yes
3.8.1	ACTIONS B.3, B.4 and B.5	The CTG is considered functional when the requirements of DCD Tier 2, Section 9.5.13.19 are satisfied and the CTG is verified to start and achieves steady state voltage $\ge$ [12.42] kV and $\le$ [15.18] kV, and frequency $\ge$ [58.8] Hz and $\le$ [61.2] Hz in less than 10 minutes.	Yes	No	4	Yes
3.8.1	ACTIONS C.4, C.5 and C.6	The CTG is considered functional when the requirements of DCD Tier 2, Section 9.5.13.19 are satisfied and the CTG is verified to start from standby conditions and achieves steady state voltage $\geq$ [12.42] kV and $\leq$ [15.18] kV, and frequency $\geq$ [58.8] Hz and $\leq$ [61.2] Hz in less than 10 minutes.	Yes	No	4	Yes
3.8.1	ACTIONS E.1 and E.2	The CTG is considered functional when the requirements of DCD Tier 2, Section 9.5.13.19 are satisfied and the CTG is verified to start from standby conditions and achieves steady state voltage $\geq$ [12.42] kV and $\leq$ [15.18] kV, and frequency $\geq$ [58.8] Hz and $\leq$ [61.2] Hz in less than 10 minutes.	Yes	No	4	Yes
3.8.1	ACTION F.1	The CTG is considered functional when the requirements of DCD Tier 2, Section 9.5.13.19 are satisfied and the CTG is verified to start from standby conditions and achieves steady state voltage $\geq$ [12.42] kV and $\leq$ [15.18] kV, and frequency $\geq$ [58.8] Hz and $\leq$ [61.2] Hz in less than 10 minutes.	Yes	No	4	Yes
3.8.1	SURVEILLANCE REQUIREMENT S	[Where the SRs discussed herein specify voltage and frequency tolerances, the following summary is applicable]	Yes	No	1	Yes
3.8.1	SR 3.8.1.9	[Reviewer's Note: The above MODE restrictions may be deleted]	No	Yes	1	Yes
3.8.1	SR 3.8.1.10	[Reviewer's Note: The above MODE restrictions may be deleted]	No	No	1	Yes
3.8.1	SR 3.8.1.13	[Reviewer's Note: The above MODE restrictions may be deleted]	No	No	1	Yes

#### ABR-AE-08000026 Attachment 3 6 of 7

1

Section	Item	[Required Information]	DAC?	Duplicated in TS	# of Brackets	Value Provided
3.8.1	SR 3.8.1.18	[Reviewer's Note: The above MODE restrictions may be deleted]	No	No ·	1	Yes
3.8.3	ACTION B.1	With lube oil inventory < [] liters, sufficient lube oil to support 7 days of continuous DG operation at full load conditions may not be available.	No	Yes	1	No
3.8.3	ACTION E.1	With starting air receiver pressure < [] MPaG, sufficient capacity for five successive DG start attempts does not exist. However, as long as the receiver pressure is > [] MPaG, there is adequate capacity for at least one start attempt	No	Yes	2	No
3.8.3	SR 3.8.3.2	The [] liter requirement is based on the DG manufacturer's consumption values for the run time of the DG.	No	Yes	1	No
3.8.3	SR 3.8.3.3	a. Sample the new fuel oil in accordance with ASTM D4057-[] (Ref. 6);	No	No	1	No
3.8.3	SR 3.8.3.3	b. Verify in accordance with the tests specified in ASTM D975-[](Ref. 6)	No	No	1	No
3.8.3	SR 3.8.3.3	that the sample has an absolute specific gravity at [15.6/15.6°C of $\ge 0.83^{\circ}$ and $\le 0.89^{\circ}$ (or an API gravity at 15.6°C of $\ge 27^{\circ}$ and $\le 39^{\circ}$ ), a kinematic viscosity at 40°C of $\ge 1.9$ mm2/s and $\le 4.1$ mm2/s, and a flash point of $\ge 51.7^{\circ}$ C]	No	No	1	Yes
3.8.3	SR 3.8.3.3	c. Verify that the new fuel oil has a clear and bright appearance with proper color when tested in accordance with ASTM D4176-[] (Ref. 6).	No	No	1	No
3.8.3	SR 3.8.3.3	Within 31 days following the initial new fuel oil sample, the fuel oil is analyzed to establish that the other properties specified in Table 1 of ASTM D975-[] (Ref. 6) are met for new fuel oil when tested in accordance with ASTM D975-[] (Ref. 6), except that the analysis for sulfur may be performed in accordance with ASTM D1552-[] (Ref. 6) or ASTM D2622-[] (Ref. 6).	No	No	4	No
3.8.3	SR 3.8.3.3	Particulate concentrations should be determined in accordance with ASTM D2276-[], Method A (Ref. 6).	No	No	1	No
3.8.3	REFERENCES	6. ASTM Standards: D4057-[ ]; D975-[ ]; D4176-[ ]; D975-[ ]; D1552-[ ]; D2622-[ ]; D2276-[ ].	No	No	7	No
3.8.6	SR 3.8.6.2	The quarterly inspection of specific gravity and voltage is consistent with IEEE-450 (Ref. 3). In addition, within 24 hours of a battery discharge < [] V or a battery overcharge > [] V, the battery must be demonstrated to meet Category B limits.	No	Yes	2	No

### ABR-AE-08000026 Attachment 3 7 of 7

Section	Item	[Required Information]	DAC?	Duplicated in TS	# of Brackets	Value Provided
3.8.6	Table 3.8.6-1	The Category A limit specified for specific gravity for each pilot cell is $\geq$ [] (0.015 below the manufacturer's fully charged nominal specific gravity or a battery charging current that had stabilized at a low value).	No	Yes	1	No
3.8.6	Table 3.8.6-1	Footnote c to Table 3.8.6-1 allows the float charge current to be used as an alternate to specific gravity for up to [] days following a battery recharge.	No	Yes	.1	No
3.8.6	Table 3.8.6-1	The Category B limit specified for specific gravity for each connected cell is $\geq$ [] (0.020 below the manufacturer's fully charged, nominal specific gravity) with the average of all connected cells > [] (0.010 below the manufacturer's fully charged, nominal specific gravity).	No	Yes	2	No
3.8.6	Table 3.8.6-1	The Category C limit for average specific gravity (≥ []), is based on manufacturer's recommendations (0.020 below the manufacturer's recommended fully charged, nominal specific gravity).	No	· Yes	1	No
3.8.11	ACTIONS B.1, B.2 and B.3	The CTG is considered functional when the requirements of DCD Tier 2, Section 9.5.13.19 are satisfied and the CTG is verified to start from standby conditions and achieves steady state voltage $\geq$ [12.42] kV and $\leq$ [15.18] kV, and frequency $\geq$ [58.8] Hz and $\leq$ [61.2] Hz in less than 10 minutes.	Yes	No	4	Yes
				·	130	

ر

## Non-DAC Brackets with No Preliminary Values

Section	ltem	[Required Information]	# of Brackets
3.1.3	SR 3.1.3.4	Verify each control rod scram time from fully withdrawn to $60\%$ rod insertion position is $\leq$ [ ] seconds.	1
3.1.3 B	SR 3.1.3.4	Verifying the scram time for each control rod to 60% rod insertion position is ≤ [] seconds provides	1
3.1.4 B	LCO 3.1.4	Table 3.1.4-1 is modified by two Notes, which state control rods with scram times not within the limits of the Table are considered "slow" and that control rods with scram times > [] seconds to 60% rod insertion position are considered inoperable as required by SR 3.1.3.4.	1
3.1.4	Table 3.1.4-1, Note 2	Enter applicable Conditions and Required Actions of LCO 3.1.3, "Control Rod Operability," for control rods with scram times > [] seconds to 60% rod insertion position.	1
3.1.4	Table 3.1.4-1	[Control Rod Scram Times] for various ROD POSITION PERCENT INSERTIONS (%) at two different steam dome pressures. (6 brackets)	6
3.2.3 B	References	1. [Non GE Fuel Analysis].	1
3.3.6.1 B	LCO	[For this plant, the PCIV position PAM instrumentation consists of the following:]	1
3.4.1	LCO 3.4.1	[] RIPs may be in operation provided the following limits are applied when the associated LCO is applicable:	1
3.4.1	LCO 3.4.1	a. LCO 3.2.1, "AVERAGE PLANAR LINEAR HEAT GENERATION RATE (APLHGR)," limits specified in the COLR for [] RIPs in operation; and	1
3.4.1	LCO 3.4.1	b. LCO 3.2.2, "MINIMUM CRITICAL POWER RATIO (MCPR)," limits specified in the COLR for [] RIPs in operation; and	1
3.4.1	LCO 3.4.1	c. LCO 3.3.1.1, "SSLC Sensor Instrumentation," Function 2.b (Average Power Range Monitors Flow Biased Simulated Thermal Power - High), Allowable Value of Table 3.3.1.1-1 is reset for operation with [] RIPs.	1

Section	ltem	[Required Information]	# of Brackets
3.4.1 B	APPLICABLE SAFETY ANALYSES	A plant specific LOCA analysis may be performed assuming only [] operating RIPs. The transient analyses of DCD Tier 2, Chapter 15 may also be performed for [] RIPs in operationDuring operation with only [] RIPs, modification to theThe APLHGR and MCPR setpoints for [] RIPs in operation are to be specified in the COLR.	4
3.4.1 B	LCO	With only [] RIPs in operation, modifications to the required APLHGR limits	1
3.4.1 B	REFERENCES	3. [Plant specific analysis for [] RIPs operating.]	2
3.4.9 B	REFERENCES	7. [ABWR P/T Limit Methodology.]	1
3.6.1.1 B	APPLICABLE SAFETY ANALYSES	The maximum allowable leakage rate for the primary containment (La) is 0.5% by weight of the containment air per 24 hours at the calculated peak containment pressure (Pa) of 279.6 kPaG or []% by weight of the containment air per 24 hours at the reduced pressure of Pt of [] MPaG (Ref. 1).	2
3.6.1.2	SR 3.6.1.2.1	The acceptance criteria for air lock testing are: b. For each door, leakage rate is $\leq 0.01$ La when the gap between the door seals is pressurized to $\geq$ [] MPaG for at least 15 minutes.	1
3.7.1	SR 3.7.1.2	Verify the water level in each RSW pump well of the UHS basin is $\geq$ [] m.	1
3.7.2	SR 3.7.2.2	Verify the water level in each RSW pump well of the UHS basin is $\geq$ [] m.	1
3.7.3	SR 3.7.3.2	Verify the water level in each RSW pump well of the intake structure UHS basin is ≥ [] m.	1
3.8.1	SR 3.8.1.3	Verify each DG is synchronized and loaded and operates for $\ge 60$ minutes at a load $\ge 7200$ kW and $\le []$ kW.	1
3.8.1	SR 3.8.1.4	Verify each day tank contains ≥ [ ] liters of fuel oil.	1
3.8.1	SR 3.8.1.14	Verify each DG operating at a power factor $\leq 0.9$ , operates for $\geq 24$ hours: b. For the remaining hours of the test loaded $\geq 7200$ kW and $\leq [$ ].	1

### Non-DAC Brackets with No Preliminary Values

Section	Item	[Required Information]	# of Brackets
3.8.3	LCO 3.8.3	One or more DGs with fuel oil level < [] liters and ≥ [] liters in storage tank.	2
3.8.3	LCO 3.8.3	One or more DGs with lube oil inventory < [] liters and $\geq$ [] liters.	2
3.8.3	LCO 3.8.3	One or more DGs with pressure in at least one starting air receiver < [] kPaG and ≥ [] kPaG.	2
3.8.3	LCO 3.8.3	Restore starting air receiver pressure to ≥ [] kPaG.	1
3.8.3	SR 3.8.3.1	Verify each fuel oil storage tank contains ≥ [] liters.	1
3.8.3	SR 3.8.3.2	Verify lube oil inventory for each DG is ≥ [] liters.	1
3.8.3 B	SR 3.8.3.2	The [] liter requirement is based on the DG manufacturer's consumption values for the run time of the DG.	1
3.8.3 B	ACTION B.1	With lube oil inventory < [] liters, sufficient lube oil to support 7 days of continuous DG operation at full load conditions may not be available.	1
3.8.3	SR 3.8.3.4	Verify each required DG air start receiver pressure is ≥ [] kPaG.	1
3.8.3 B	ACTION E.1	With starting air receiver pressure < [] MPaG, sufficient capacity for five successive DG start attempts does not exist. However, as long as the receiver pressure is > [] MPaG, there is adequate capacity for at least one start attempt	2
3.8.3 B	SR 3.8.3.3	a. Sample the new fuel oil in accordance with ASTM D4057-[] (Ref. 6);	1
3.8.3 B	SR 3.8.3.3	b. Verify in accordance with the tests specified in ASTM D975-[] (Ref. 6) that the sample has an absolute specific gravity	1
3.8.3 B	SR 3.8.3.3	c. Verify that the new fuel oil has a clear and bright appearance with proper color when tested in accordance with ASTM D4176-[] (Ref. 6).	1
3.8.3 B	SR 3.8.3.3	Within 31 days following the initial new fuel oil sample, the fuel oil is analyzed to establish that the other properties specified in Table 1 of ASTM D975- [] (Ref. 6) are met for new fuel oil when tested in accordance with ASTM D975-[] (Ref. 6), except that the analysis for sulfur may be performed in accordance with ASTM D1552-[] (Ref. 6) or ASTM D2622-[] (Ref. 6).	4
3.8.3 B	SR 3.8.3.3	Particulate concentrations should be determined in accordance with ASTM D2276-[], Method A (Ref. 6).	1

#### ABR-AE-08000026 Attachment 4 4 of 5

### Non-DAC Brackets with No Preliminary Values

Section	Item	[Required Information]	# of Brackets
3.8.3 B	REFERENCES	6. ASTM Standards: D4057-[ ]; D975-[ ]; D4176-[ ]; D975-[ ]; D1552-[ ]; D2622-[ ]; D2276-[ ].	7
3.8.4	SR 3.8.4.1	Verify battery terminal voltage is $\geq$ [] V on float charge.	1
3.8.4	SR 3.8.4.2	Verify connection resistance is $\leq$ [] ohms for inter-cell connections, $\leq$ [] ohms for inter-rack connections, $\leq$ [] ohms for inter-tier connections, and $\leq$ [] ohms for terminal connections.	4
3.8.4	SR 3.8.4.5	Verify connection resistance is $\leq$ [ ] ohms for inter-cell connections, $\leq$ [ ] ohms for inter-rack connections, $\leq$ [ ] ohms for inter-tier connections, and $\leq$ [ ] ohms for terminal connections.	4
3.8.4	SR 3.8.4.6	Verify each required battery charger supplies $\geq$ [ ] amps at $\geq$ 125 V for $\geq$ 12 hours.	1
3.8.6	SR 3.8.6.2	Once within 24 hours after battery discharge < [] V <u>AND</u> Once within 24 hours after battery Overcharge > [] V	2
3.8.6 B	SR 3.8.6.2	The quarterly inspection of specific gravity and voltage is consistent with IEEE-450 (Ref. 3). In addition, within 24 hours of a battery discharge < [] V or a battery overcharge > [] V, the battery must be demonstrated to meet Category B limits.	2
3.8.6	Table 3.8.6-1	CATEGORY A: ≥ [] CATEGORY B: ≥ [] AND Average of all connected cells > [] CATEGORY C: Average of all connected cells ≥ []	4
3.8.6	Table 3.8.6-1	Or battery charging current is < [] amps when on float charge. This is acceptable only during a maximum of [] days following a battery recharge.	2
3.8.6 B	Table 3.8.6-1	The Category A limit specified for specific gravity for each pilot cell is $\geq$ [] (0.015 below the manufacturer's fully charged nominal specific gravity or a battery charging current that had stabilized at a low value).	1
3.8.6 B	Table 3.8.6-1	Footnote c to Table 3.8.6-1 allows the float charge current to be used as an alternate to specific gravity for up to [] days following a battery recharge.	1

.....

ABR-AE-08000026 Attachment 4 5 of 5

Section	Item	[Required Information]	# of Brackets
3.8.6 B	Table 3.8.6-1	The Category B limit specified for specific gravity for each connected cell is $\geq$ [] (0.020 below the manufacturer's fully charged, nominal specific gravity) with the average of all connected cells > [] (0.010 below the manufacturer's fully charged, nominal specific gravity).	2
3.8.6 B	Table 3.8.6-1	The Category C limit for average specific gravity (≥ []), is based on manufacturer's recommendations (0.020 below the manufacturer's recommended fully charged, nominal specific gravity).	1
5.5	5.5.2.7 a	Control Room Habitability System [Flowrate], Standby Gas Treatment System [Flowrate]	2
5.5	5.5.2.7 b	Control Room Habitability System [Flowrate], Standby Gas Treatment System [Flowrate]	2

# Non-DAC Brackets with No Preliminary Values

5.5	5.5.2.7 a	Control Room Habitability System [Flowrate], Standby Gas Treatment System [Flowrate]	2
5.5	5.5.2.7 b	Control Room Habitability System [Flowrate], Standby Gas Treatment System [Flowrate]	2
5.5	5.5.2.7 d	Control Room Habitability System [Delta P] and [Flowrate], Standby Gas Treatment System [Delta P] and [Flowrate]	4
5.5	5.5.2.7 e	Control Room Habitability System [Wattage], Standby Gas Treatment System [Wattage]	2
57	5.7.1.5 b	[COLR - Identify the Topical Report(s) by number, title, date, and NRC staff approval document, or identify the staff Safety Evaluation Report for a plant specific methodology by NRC letter and date.]	1
5.7	5.7.1.6	[PTLR - Topical Report(s), number, title, date, and NRC staff approval document, or staff safety evaluation report for a plant specific methodology by NRC letter and date].	1
t			99

### Commitments

The following table identifies new actions committed to by STPNOC in this letter. Any other statements in this letter are provided for information purposes and are not considered to be regulatory commitments.

Number	Commitment	Due Date or Milestone
1	STP Nuclear Operating Company will provide preliminary values for all 99 of the non-DAC bracketed items that do not contain preliminary values by August 15, 2008	8/15/08
2	STP Nuclear Operating Company will provide final values for all 226 of the non-DAC bracketed items by March 31, 2010	3/31/10