

## PMSTPCOL PEmails

---

**From:** Foster, Rocky  
**Sent:** Thursday, May 21, 2009 3:43 PM  
**To:** Harbuck, Craig  
**Cc:** Joseph, Stacy; STPCOL  
**Subject:** FW: Response to Request for Additional Information (Chapter 16)  
**Attachments:** U7-C-STP-NRC-090048\_signed.pdf

Craig,

Attached is STP's response to RAI 16-1. Please review and provide your determination on resolution to Stacy Joseph and/or myself within 30 days.

Thanks,

Rocky

---

**From:** Ballinger, Amy [mailto:aballinger@STPEGS.COM]  
**Sent:** Thursday, May 21, 2009 2:29 PM  
**To:** Adrian Muniz; Belkys Sosa; Dyer, Linda; George Wunder; Loren Plisco; Raj Anand; Rocky Foster; Stacy Joseph; Tekia Govan; Tom Tai  
**Subject:** Response to Request for Additional Information

Good afternoon,

Attached is a courtesy copy of the letter with responses to the NRC's request for additional information related to the Combined License Application Part 2 ,Chapter 16, and Part 4 . The official paper copies were sent via UPS according to the addressee list.

If you have any questions please contact Steve Cashell at (361) 972-4686

*Amy Ballinger*

STP Units 3 & 4  
Licensing Specialist  
Phone: (361)972-4644  
Fax: (361) 972-4751

**Hearing Identifier:** SouthTexas34Public\_EX  
**Email Number:** 1260

**Mail Envelope Properties** (3D27D29AB75BCD4BAE913B63CBFBEDFDC7EF86D20)

**Subject:** FW: Response to Request for Additional Information (Chapter 16)  
**Sent Date:** 5/21/2009 3:43:08 PM  
**Received Date:** 5/21/2009 3:43:11 PM  
**From:** Foster, Rocky

**Created By:** Rocky.Foster@nrc.gov

**Recipients:**

"Joseph, Stacy" <Stacy.Joseph@nrc.gov>  
Tracking Status: None  
"STPCOL" <STP.COL@nrc.gov>  
Tracking Status: None  
"Harbuck, Craig" <Craig.Harbuck@nrc.gov>  
Tracking Status: None

**Post Office:** HQCLSTR01.nrc.gov

<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	979	5/21/2009 3:43:11 PM
U7-C-STP-NRC-090048_signed.pdf		1554560

**Options**

**Priority:** Standard  
**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**



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

May 21, 2009  
U7-C-STP-NRC-090048

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 Nos. 52-012 and 52-013  
Response to Request for Additional Information

Attached is the response to an NRC staff question included in Request for Additional Information (RAI) letter number 101 related to combined licensing application (COLA) Part 2 Chapter 16, and Part 4 – Plant-specific Technical Specifications. This submittal completes the response to this RAI letter. The attachment provides the response to RAI question 16-1.

When a change to the COLA is indicated, the change will be incorporated into the next routine revision of the COLA following NRC acceptance of the response.

There are no commitments in this letter.

If you have any questions, please contact me at (361) 972-7136, or Bill Mookhoek at (361) 972-7274.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 5/21/09

Scott Head  
Manager, Regulatory Affairs  
South Texas Project Units 3 & 4

gsc

Attachment:

Question 16-1

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

Kathy C. Perkins, RN, MBA  
Assistant Commissioner  
Division for Regulatory Services  
Texas Department of State Health Services  
P. O. Box 149347  
Austin, Texas 78714-9347

Alice Hamilton Rogers, P.E.  
Inspection Unit Manager  
Texas Department of State Health Services  
P.O. Box 149347  
Austin, TX 78714-9347

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

\*Steven P. Frantz, Esquire  
A. H. Gutterman, Esquire  
Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Ave. NW  
Washington D.C. 20004

\*George F. Wunder  
\*Stacy Joseph  
Two White Flint North  
11545 Rockville Pike  
Rockville, MD 20852

(electronic copy)

\*George Wunder  
\*Stacy Joseph  
Loren R. Plisco  
U. S. Nuclear Regulatory Commission

Steve Winn  
Eddy Daniels  
Joseph Kiwak  
Nuclear Innovation North America

Jon C. Wood, Esquire  
Cox Smith Matthews

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

**RAI 16-1****QUESTION:**

In its combined license (COL) application for STP 3 & 4, the applicant must complete all site-specific information necessary to resolve COL Action Item 16-1. This site-specific information mostly consists of numerical values of technical specification (TS) limits and is indicated by the use of brackets, reviewer's notes, footnotes, or other "placeholder" indicators in the generic technical specifications (GTS), and also in the proposed plant specific technical specifications (PTS). This site-specific information must be provided or confirmed by the COL applicant in the COL application to be consistent with applicable regulations and statutes (see DC/COL-ISG-8, "Technical Specification Information that Combined License Applicants Must Provide in Combined License Applications"). Accordingly, for each site-specific information item, provide or confirm, in order of preference, (1) the site-specific information, (2) useable information that bounds the site specific information, or (3) a reference to an associated TS in PTS administrative controls Section 5.5, "Programs and Manuals," or 5.6, "Reporting Requirements," that requires using an NRC-approved methodology to determine the site-specific information and establishes a program or report in which the site-specific information will be documented external to the PTS. For each site-specific information item, the applicant shall describe in its COL application, including in the PTS bases as applicable (i.e., TS, TS Bases and FSAR), the following:

- For site-specific information, the method used to determine the information and why the information is useable for facility operation in all applicable operational modes including power operation up to the proposed thermal power limit.
- For bounding information, the method used to determine the information and that the information is bounding to the site-specific information, and why the information is useable for facility operation in all applicable operational modes including power operation up to the proposed thermal power limit.
- Regarding the methodology approach, the administrative control TS shall (a) explicitly reference by title and date the NRC-approved methodology that is specified for determining the site-specific information, and the NRC safety evaluation approving the methodology (b) require establishing an associated document or report in which to record and maintain the site-specific information external to the PTS, and (c) specify any other information or restrictions necessary and appropriate to satisfy 10 CFR 50.36. This would satisfy 10 CFR 50.36 with respect to the relocated site-specific information by virtue of the approved methodology and the Enclosure restrictions spelled out in the administrative control TS; this is consistent with the standard technical specification administrative controls that require maintaining specified plant operating limits in the core operating limits report and the reactor coolant system pressure and temperature limits report.

To facilitate a comprehensive response to this information request, a listing of all COL action, or information, items identified in chapter 16 of the ABWR design control document and Revision 2 of the STP 3&4 COL application is attached. The applicant is requested to verify that the list is complete and accurate and in addition identify which of three options listed above will be used to satisfy the requirements of 10 CFR 50.36 for each numbered item. If the methodology approach is taken, then the applicant should explain why one of the other two options was not taken. Please see the attached table for the list of items.

**RESPONSE:**

The attached table lists the COL information items identified in Chapter 16 of the ABWR Design Control Document and Revision 2 of the STP 3 & 4 COLA. The options chosen and the resolution for the site-specific information used to complete each COL information item are included in the table provided with this RAI response. The table provides the following information for each COL information item:

1. Item number (from RAI attachment)
2. The specific PTS subsection (from RAI attachment)
3. The source, PTS or GTS (from RAI attachment)
4. A description of the site-specific information that is to be addressed in the PTS (from RAI attachment)
5. The PTS Requirements (from RAI attachment)
6. The option chosen to satisfy the requirements of 10 CFR 50.36.
7. The resolution for the option chosen.

**Operational Mode**

Information provided to complete the COL items is not dependent upon the operational mode or thermal power level. Therefore, the information provided supports operation in all applicable operational modes, including power operation up to the proposed thermal power limit.

**Brackets Removal**

The brackets will be removed from all of the COL information items in Revision 3 to the COLA. There are three items still under evaluation. Values for these three items are expected to be available for inclusion in Revision 3 to the COLA.

- Item 74 - SR 3.4.9.4 Note: Not required to be performed until 30 minutes after RCS temperature  $\leq [27^{\circ}\text{C}]$  in MODE 4. The bracketed value will be determined during development of the PTLR which is scheduled for submittal on July 30, 2009.
- Item 75 - SR 3.4.9.5 Note: Not required to be performed until 12 hours after RCS temperature  $\leq [38^{\circ}\text{C}]$  in MODE 4. The bracketed value will be determined during development of the PTLR which is scheduled for submittal on July 30, 2009.
- Item 78 – Bases - Applicable Safety Analyses 3.6.1.1. The containment allowable leakage rate values will be determined as part of the containment analysis which is scheduled for submittal on July 15, 2009.

## Proposed New or Revised Exemptions

The following items result in new or revised departures:

- Item 8 - Specification 3.2.3, Linear Heat Generation Rate (LHGR), (Non-GE Fuel) is not applicable to this License Application at this time. Therefore, in order to comply with this RAI, Specification 3.2.3 is being deleted from the COLA in accordance with new standard departure STD DEP 16.3-95. This eliminates the bracket associated with Item 8.
- Item 20 - A new Specification, 5.5.2.11, "Setpoint Control Program" is being added in order to utilize the methodology approach (Option 3) specified in the RAI for instrument allowable values. The topical report upon which this methodology is based, "Methodology for South Texas Project Units 3&4 ABWR Technical Specification Setpoints," is scheduled to be submitted on November 30, 2009.
- Item 46 - STD DEP 16.3-39 will be revised to address testing of the actuated device.
- Item 95 - STD DEP 16.3-16 will be revised to include the addition of SR 3.7.1.4, SR 3.7.2.4, and SR 3.7.3.4 for testing of cooling tower cell fans.
- Item 136 - STD DEP 16.5-5 will be written to incorporate TSTF-511 regarding working hours, which was approved for referencing in FR 79923 on November 30, 2008. This TSTF removes Specification 5.2.2 (d) because the Technical Specification requirements related to working hours have been superseded by the worker fatigue requirements in 10 CFR 26.

## Methodology Approach

The methodology approach was chosen for the instrument setpoint values (allowable values in the COLA) because the specific instruments used to determine these values, have not been chosen as yet. As stated above, a new Specification, "5.5.2.11, Setpoint Control Program" is being added in order to utilize the methodology approach. The methodology approach was also chosen for the PTLR values specified in the COLA (Items 74 and 75) because neither a plant specific value nor an exact bounding value is available at this time. These values will be derived during development of the PTLR.

## Surveillance Intervals

In general, the completion times and surveillance frequencies identified in the GTS were retained as being reasonable and consistent with those of similar functions in NUREG 1434, "Standard Technical Specifications General Electric Plants, BWR/6." These are designated as Option – n/a because they are based on other plant's operating experience and are not specifically calculated.

## Proposed COLA Revision

COLA Part 2, Chapter 16.5 and COLA Part 4 will be revised to remove the brackets and to address the COL information items as described above and in the Table, and will also be revised to include the new Specification 5.5.2.11, "Setpoint Control Program" described above and as shown below:

### Procedures, Programs, and Manuals 5.5

#### 5.5 Procedures, Programs and Manuals

##### 5.5.2.11 Setpoint Control Program (SCP)

- a. The Nominal Trip Setpoints (NTSPs), Allowable Values (AVs), and As-Found and Leave Alone Tolerance Bands, and the methodologies used to determine these values shall be established and shall be documented in the SCP for each of the required Technical Specification Instrumentation Functions in the following:
  1. Specification 3.3.1.1, "Safety System Logic and Control (SSLC) Sensor Instrumentation,"
  2. Specification 3.3.1.4, "ESF Actuation Instrumentation,"
  3. Specification 3.3.4.1, "Anticipated Transient Without Scram (ATWS) and End-of-Cycle Recirculation Pump Trip (EOC-RPT) Instrumentation
  4. Specification 3.3.4.2, "Feedwater Pump and Main Turbine Trip Instrumentation
  5. Specification 3.3.7.1, "Control Room Habitability Area (CRHA) Heating, Ventilation, and Air Conditioning (HVAC) Subsystem
  6. Specification 3.3.8.1, "Electric Power Monitoring" Instrumentation,"
- b. The analytical methods used to determine the NTSPs, and AVs, and As-Found and Leave Alone Tolerance Bands shall be those previously reviewed and approved by the NRC, specifically those described in the following document(s):
  1. "Methodology for South Texas Project Units 3 & 4 ABWR Technical Specification Setpoints"
- c. The SCP shall also establish provisions for:
  1. Evaluation of an instrumentation channel to verify it is functioning as required, before return to service, when the as-found channel setpoint is found conservative with respect to the Allowable Value but outside its predefined As-Found Tolerance Band; and
  2. Resetting an instrumentation channel setpoint to a value that is within the Leave Alone Tolerance Band of the associated NTSP or of a value that is more conservative than the NTSP or, otherwise, declaring the channel to be inoperable.

COLA Part 7 will be revised to include the identified exemptions.



**South Texas Project Units 3 and 4 Reference Combined License Applications (RCOLAs), Revision 2 Site-Specific Information Identified in ABWR Generic Technical Specifications (GTS) to be Provided by COL Applicant In the Plant-Specific Technical Specifications (PTS) - COL Action Item 16-1**

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
1	B 2.1.2	PTS	Edition of the ASME, Boiler and Pressure Vessel Code, Section III	Bases for 2.1.2 RCS Pressure SL, ASA paragraph 2, and Reference 5	1	The bracketed wording "Later" and "Later Edition" were replaced with "1989 Edition, excluding Addenda" in a previous revision to the COLA.
2	B 3.0	PTS	Reactor steam dome pressure for performing control rod scram time testing	Bases for PTS SR 3.0.1, Discussion on post-maintenance testing: Example a, "[5.51 MPaG]" is replaced with "6.55 MPaG;" reference to SR 3.1.4.3 is corrected per STD DEP 16.3-2. Example b, "HPCF" is replaced by "RCIC" per STD DEP 16.3-2.	1	[5.51 MPaG] was replaced with 6.55 MPaG and HPCF was replaced with RCIC per STD DEP 16.3-2.
3	3.1.3	PTS	Limit on Control rod scram time from fully withdrawn to 60% rod insertion position	SR 3.1.3.4, Verify each control rod scram time from fully withdrawn to 60% rod insertion position is ≤ [1.44] seconds.  GTS SR 3.1.3.4 bases, "[ ] seconds" is replaced by "[1.44] seconds"	1	Analytically derived value
4	3.1.4	PTS	Maximum number of slow OPERABLE control rods	LCO 3.1.4.a, No more than [8] OPERABLE control rods shall be "slow," in accordance with Table 3.1.4-1.  Bases for LCO 3.1.4, "The scram times have a margin to allow up to [8.0] of the control rods to have scram times that exceed the specified limits"	1	Analytically derived value .
5	3.1.4	PTS	Scram time criterion for inoperable control rod.	Table 3.1.4-1, Control Rod Scram Times, Note 2: Enter applicable Conditions and Required Actions of LCO 3.1.3, "Control Rod Operability," for control rods with scram times > [1.44 ] seconds to 60% rod insertion position. These control rods are inoperable, in accordance with SR 3.1.3.4, and are not considered "slow."  Bases for LCO 3.1.4, "[ ] seconds" is replaced by "[1.44] seconds"	1	Analytically derived value .

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
6	3.1.4	PTS	Six scram time values at 10%, 40%, and 60% rod insertion for 6.55 MPaG and 7.24 MPaG reactor steam dome pressure	Table 3.1.4-1 Control Rod Scram Times Bases for GTS and PTS 3.1.4 contain no scram time values.	1	Analytically derived value.
7	3.1.7	PTS	Temperature limit values for SLC pump operation; remove reviewer's note.	Figure 3.1.7-1, Sodium Pentaborate Solution Temperature / Concentration Requirements	1	The reviewer's note "Temperature limit for SLC Pump Operation to be determined by COL Applicant" and the brackets surrounding "54.4°C" will be removed. The bracketed value of 54.4°C will be replaced by the NPSH limit of 43°C. The corresponding tank concentration for 43°C will also be provided for this upper operating limit from Figure 3.1.7-1.
8	B 3.2.3	PTS	Reference to non GE fuel analysis document.	Bases for PTS 3.2.3, LINEAR HEAT GENERATION RATE (LHGR), Reference 1, [Non GE Fuel Analysis]. Background and Applicable Safety Analyses sections of Bases for PTS 3.2.3, LHGR, list Reference 1.	n/a	Linear Heat Generation Rate (LHGR), (Non-GE Fuel) is not applicable to this License Application at this time. Therefore, Specification 3.2.3 and its Bases are being deleted from the COLA in accordance with a new standard departure STD DEP 16.3-95. This eliminates the bracket.
9	B 3.3.1.1	PTS	Minimum number of local power range monitor (LPRM) inputs for each average power range monitor (APRM) division.	Bases for PTS 3.3.1.1, in Table 3.3.1.1-1, Function 2.a, APRM Neutron flux – High, Setdown, requires at least [20] LPRM inputs for each APRM division.	1	"20" will be replaced by "32" and the brackets will be removed.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
10	3.3.1.1	PTS	Applicability conditions for SSLC Sensor Instrumentation in percent RTP	Table 3.3.1.1-1, Functions 2.e, Rapid Core Flow Decrease, $\geq$ [80]% RTP; 13, Turbine Stop Valve Closure, $\geq$ [40]% RTP; and 14, Turbine Control Valve Fast Closure, Trip oil Pressure - Low, $\geq$ [40]% RTP  Bases for Function 2.e states "Rapid Core Flow Decrease Function is required . . . when thermal power is greater than [80] % RTP . . ."	1	For Function 2.e, the bracketed "80%" will be replaced by "75%" RTP.  The Functions 13 and 14, the bracketed 40% RTP permissive for TSV Closure and TCV Fast Closure is an analytically assumed value.
11	3.3.1.1	PTS	Applicability condition for SSLC Sensor Instrumentation in percent RTP	Table 3.3.1.1-1, Function 1.b, SRNM Neutron Flux - Short Period, MODE 2 and MODE 5, Table Note (b) Trip automatically bypassed within each SRNM and not required to be OPERABLE at reactor power levels $\leq$ [0.0001]% RTP	1	Design value. This function is automatically bypassed while in the counting range. It is enabled at 0.0001% RTP in the mean square voltage (MSV) range.
12	3.3.1.1	PTS	Oscillation Power Range Monitor Allowable Values in terms of neutron flux oscillation limits	SR 3.3.1.1.10 SENSOR CHANNEL CALIBRATION for Safety System Logic and Control Sensor Instrumentation - Table 3.3.1.1-1, Function 2.f, Oscillation Power Range Monitor, Allowable Values listed in Footnote (c); allowable values given in terms of (1) upper and lower period values in seconds, and (2) number of cycles with peak to peak amplitude $\geq$ limit in percent of point, or increase in amplitude over specified number of cycles $\geq$ limit in percent of point per cycle	1	The bracketed information is consistent with the DCD and BWR operating experience and the brackets will be removed.
13	3.3.1.1	PTS	SR 3.3.1.1.2 Frequency	SR 3.3.1.1.2 Frequency of [7] days for: Verify the absolute difference between the average power range monitor (APRM) channels and the calculated power is $\leq$ 2% RTP. Bases for PTS SR 3.3.1.1.2 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time.
14	3.3.1.1	PTS	SR 3.3.1.1.3 Frequency	SR 3.3.1.1.3 Frequency of [7] days for: Perform DIVISION FUNCTIONAL TEST for Table 3.3.1.1-1, Functions 1 a (MODE 2), 1 b (MODE 2), 1 d (MODES 1 & 2), and 2 a. Bases for PTS SR 3.3.1.1.3 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time.
15	3.3.1.1	PTS	SR 3.3.1.1.4 Frequency	SR 3.3.1.1.4 Frequency of [31] days for: Perform DIVISION FUNCTIONAL TEST for Table 3.3.1.1-1, Functions 1 a (MODE 5), 1 b (MODE 5), and 1 d (MODE 5). Bases for PTS SR 3.3.1.1.4 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
16	3.3.1.1	PTS	SR 3.3.1.1.5 Frequency	SR 3.3.1.1.5 Frequency of [92] days for: Perform DIVISION FUNCTIONAL TEST for Table 3.3.1.1-1, Functions 1 c, 2 b c d e f g, 3 a b, 4, 5, 6 a b, 7 a b, 8 a b c, 9 a b c, 10, 11 a b c d, 12 (MODES 1 and 2), 13, 14, 15, 16 a b, 17, 18, 19, 20, 21, 22, 23, 24 a b, 25, 26, 27, 28, 29, 30, 31, 32, and 33. NOTE: Functions 11 d and 15 were added in PTS, in accordance with STD DEP T1 2.4-2. Bases for PTS SR 3.3.1.1.5 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time.  STD DEP T1 2.4-2
17	3.3.1.1	GTS and PTS	SR 3.3.1.1.5 Frequency	GTS SR 3.3.1.1.5 Frequency of [92] days for: Perform DIVISION FUNCTIONAL TEST for Table 3.3.1.1-1, Functions 15 a & 15 b. NOTE: These functions are deleted in PTS, in accordance with STD DEP T1 2.3-1 Bases for GTS SR 3.3.1.1.5 Frequency	n/a	Table 3.3.1.1-1, Functions 15 a & 15 b were deleted in accordance with STD DEP T1 2.3-1.
18	3.3.1.1	PTS	SR 3.3.1.1.6 Frequency	SR 3.3.1.1.6 Frequency of [92] days for: Perform DIVISION FUNCTIONAL TEST for Table 3.3.1.1-1, Functions 3 c and 7 c, Bases for PTS SR 3.3.1.1.6 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time.
19	3.3.1.1	PTS	SR 3.3.1.1.8 Frequency	SR 3.3.1.1.8 Frequency of [7] days for: Perform DIVISION FUNCTIONAL TEST for Table 3.3.1.1-1, Functions 1 a (MODE 2), 1 b (MODE 2), and 2 a Bases for PTS SR 3.3.1.1.8 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
20	3.3.1.1	PTS	SSLC Sensor Instrumentation Allowable Values	SR 3.3.1.1.10 SENSOR CHANNEL CALIBRATION for Safety System Logic and Control Sensor Instrumentation Function Allowable Values listed in Table 3.3.1.1-1, Functions 1 a b, 2 a b c e f, 3 a b, 4, 5, 6 a b, 7 a b, 8 a b c, 9 a b c, 10, 11 a b c d, 12 (MODE 5), 13, 14, 15, 16 a b, 17, 18, 19, 20, 21, 22, 23, 24 a b, 25, 27, 28, 29, 30, 31, 32, 33. NOTE: Functions 11 d and 15 were added in PTS, in accordance with STD DEP T1 2.4-2.	3	The brackets associated with allowable values will be removed and the phrase "In accordance with TS 5.5.2.11, Setpoint Control Program" will be inserted. The Technical Specifications will be revised to include an Administrative Controls Program, TS 5.5.2.11, "Setpoint Control Program," that will reference the as yet to be approved setpoint methodology document. This is hereafter referred to as the "SCP DISCUSSION."  Note: Function 1c, although not listed, is included in Option 3, SCP Discussion.
21	3.3.1.1	GTS and PTS	SSLC Sensor Instrumentation Allowable Values	SR 3.3.1.1.10 SENSOR CHANNEL CALIBRATION for Safety System Logic and Control Sensor Instrumentation Function Allowable Values listed in Table 3.3.1.1-1, Functions 15 a & 15 b. NOTE: These functions are deleted in PTS, in accordance with STD DEP T1 2.3-1	n/a	Table 3.3.1.1-1, Functions 15 a & 15 b were deleted in accordance with STD DEP T1 2.3-1.
22	3.3.1.1	PTS	SSLC Sensor Instrumentation Allowable Values	SR 3.3.1.1.11 CHANNEL CALIBRATION for Safety System Logic and Control (SSLC) Sensor Instrumentation Function channel trip setting Allowable Values listed in Table 3.3.1.1-1, Functions 3 c and 7 c	3	SCP Discussion See Item 20
23	B 3.3.1.1	PTS	Thermal power time constant for APRM Simulated Thermal power – High, Flow Biased, SSLC Sensor Function	Bases for PTS 3.3.1.1, Table 3.3.1.1-1 Function 2.b, APRM Simulated Thermal Power – High, Flow Biased, states "The thermal power time constant of < [7] seconds is based on the fuel heat transfer dynamics."	3	SCP Discussion See Item 20

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
24	B 3.3.1.1	PTS	SSLC Sensor Instrumentation Function Applicability	Bases for PTS 3.3.1.1, Table 3.3.1.1-1 Function 17, Condensate Storage Tank Level – Low Function, and Function 18, Suppression pool Water level – High, state. "This Function must also be OPERABLE in MODES 4 and 5 when HPCF is used to satisfy the requirement that at least 2 ECCS system be OPERABLE with RPV Level less than [23] feet above the vessel flange.	1	Design basis value is 7.0 meters or 23 feet.
25	B 3.3.1.1	PTS	Minimum main steam line leak rate in main steam tunnel to reach the temperature instrumentation setting allowable value.	Bases for PTS 3.3.1.1, Table 3.3.1.1-1 Function 22, Main Steam Tunnel Temperature – High, states "The Main Steam Tunnel Temperature – High Allowable Value is chosen to detect a leak equivalent to [95] L/min."	1	The bracketed value is correct and the brackets will be removed.
26	3.3.1.2	PTS	SR 3.3.1.2.1 Frequency	SR 3.3.1.2.1, Perform CHANNEL FUNCTIONAL TEST with a Frequency of [7] days for RPS and MSIV Actuation Instrumentation listed in Table 3.3.1.2-1, Function 3, Manual RPS Scram	n/a	The brackets will be removed because additional flexibility is not supported at this time.
27	3.3.1.2	PTS	SR 3.3.1.2.2 Frequency	Bases for PTS SR 3.3.1.2.1 Frequency SR 3.3.1.2.2, Perform DIVISION FUNCTIONAL TEST with a Frequency of [92] days for RPS and MSIV Actuation Instrumentation listed in Table 3.3.1.2-1, Function 1.a, RPS Actuation LOGIC CHANNELS, and Function 2.a, MSIVs and MSL Drain Valves Actuation LOGIC CHANNELS	n/a	The brackets will be removed because additional flexibility is not supported at this time.
28	3.3.1.2	PTS	SR 3.3.1.2.3 Frequency	Bases for PTS SR 3.3.1.2.2 Frequency SR 3.3.1.2.3, Perform CHANNEL FUNCTIONAL TEST with a Frequency of [92] days for RPS and MSIV Actuation Instrumentation listed in Table 3.3.1.2-1, Function 5, Manual MSIV Actuation	n/a	The brackets will be removed because additional flexibility is not supported at this time.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
29	3.3.1.3	PTS	SR 3.3.1.3.1 Frequency	SR 3.3.1.3.1, Perform DIVISION FUNCTIONAL TEST with a Frequency of [92] days for SLC and FWRB Actuation Instrumentation as listed in Table 3.3.1.3-1, Function 1.a, SLC LOGIC CHANNELS: Function 2.a, FWRB LOGIC CHANNELS, and Function 3, Manual ATWS-ARI/SLCS Initiation Bases for SR 3.3.1.3.1 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time.
30	3.3.1.4	PTS	SR 3.3.1.4.3 Frequency	SR 3.3.1.4.3, Perform DIVISION FUNCTIONAL TEST with a Frequency of [92] days for ESF Actuation Instrumentation as listed in Table 3.3.1.4-1, Functions 1 a b c e, 2 a b c d f g, 3 a b c e, 4 a c d e f, 5 a b c e, 6 a, 7 a c d e, 8 a, 9 a c, 10 a c d e g, 11, 12 a c d, 13 a, 14 a, and 15 a Bases for SR 3.3.1.4.3 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time.
31	3.3.1.4	PTS	ESF Actuation, Sensor Instrumentation Allowable Values	SR 3.3.1.4.6 SENSOR CHANNEL CALIBRATION for ESF Actuation, Sensor Instrumentation Function channel trip setting Allowable Values listed in Table 3.3.1.4-1, Functions 1 a b, 2 a b c, 3 a b, 4 d e, 5 a b, 7 d e, 10 c d	3	SCP Discussion See Item 20 Note: Function 12d, although not listed, is included in Option 3, SCP Discussion.
32	B 3.3.2.1	PTS	Bases for Required Action E.1 Completion Time	Bases for GTS and PTS 3.3.2.1 Required Action E.1 Completion Time is stated as "[7] days."	n/a	The brackets will be removed because additional flexibility is not supported at this time.
33	B 3.3.2.1	PTS	Bases for SR 3.3.2.1.1 Frequency	GTS and PTS bases for SR 3.3.2.1.1 state the frequency as "[12] hours."	n/a	The brackets will be removed because additional flexibility is not supported at this time.
34	3.3.2.1	PTS	SR 3.3.2.1.4 Frequency	SR 3.3.2.1.4, Perform CHANNEL FUNCTIONAL TEST with a Frequency of [7] days for SRNM Instrumentation as listed in Table 3.3.2.1-1, Function 1 (MODE 5) Bases for SR 3.3.2.1.4 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
35	3.3.2.1	PTS	SR 3.3.2.1.5 Frequency	SR 3.3.2.1.5. Perform CHANNEL FUNCTIONAL TEST with a Frequency of [3*] days for SRNM Instrumentation as listed in Table 3.3.2.1-1, Function 1 (MODEs 2, 3, and 4) Bases for SR 3.3.2.1.5 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time
36	3.3.3.1	PTS	Completion Time for Required Action B.1	PTS 3.3.3.1 Required Action B.1, Restore all data transmission segments in at least three ECF divisions to OPERABLE status in [30] days. Note that "ECF" replaced "EMS" per STD DEP T1 3.4-1. The bases for PTS 3.3.3.1 Required Action B.1 do not state a value for the completion time.	n/a	The brackets will be removed because additional flexibility is not supported at this time
37	3.3.3.1	PTS	SR 3.3.3.1.1 Frequency	PTS SR 3.3.3.1.1, Verify the required data transmission path segments are OPERABLE, with a frequency of [92] days. Bases for SR 3.3.3.1.1 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time
38	3.3.4.1	PTS	Completion Time for Required Action E.1	GTS 3.3.4.1 Required Action E.1, restore at least one channel to OPERABLE status in [24] hours, for ATWS and EOC-RPT Instrumentation Functions listed in the associated note and in Table 3.3.4.1-1. Functions 2, 4, and 9 The bases for PTS 3.3.4.1 Required Action E.1 do not bracket the value for the completion time.	n/a	The brackets have been removed because additional flexibility is not supported at this time
39	3.3.4.1	PTS	Completion Times for Required Actions F.1 and F.2	PTS 3.3.4.1 Required Action F.1, Apply the MCPDR limit for inoperable EOC-RPT as specified in the COLR in [2] hours, or F.2, Reduce power to ≤ 40% RTP in [2] hours, for ATWS and EOC-RPT Instrumentation Function listed in the associated note and in Table 3.3.4.1-1. Function 4 Bases for PTS 3.3.4.1 Required Actions F.1 and F.2.	n/a	The brackets will be removed because additional flexibility is not supported at this time
40	3.3.4.1	PTS	Completion Time for Required Action G.1	GTS 3.3.4.1 Required Action G.1, restore channels to OPERABLE status, in [24] hours, for ATWS and EOC-RPT Instrumentation Functions listed in the associated note and in Table 3.3.4.1-1. Functions 6, 7, 8, 10, 12, 13, 15, and 16. Bases for PTS 3.3.4.1 Required Action G.1.	n/a	The brackets will be removed because additional flexibility is not supported at this time



Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
41	3.3.4.1	PTS	SR 3.3.4.1.2 Frequency	SR 3.3.4.1.2 Frequency of [92] days for: Perform CHANNEL FUNCTIONAL TEST for ATWS and EOC-RPT Instrumentation listed in Table 3.3.4.1-1, Functions 1, 2, 3, 4, 5, and 9. Bases for SR 3.3.4.1.2 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time
42	3.3.4.1	PTS	ATWS and EOC-RPT, Sensor Instrumentation Allowable Values	SR 3.3.4.1.3 SENSOR CHANNEL CALIBRATION for ATWS and EOC-RPT Instrumentation Function channel trip setting Allowable Values listed in Table 3.3.4.1-1, Functions 1, 2, 3, and 7 (footnote (a))	3 1	SCP Discussion for Function 1, 2 and 3 Allowable Values See Item 20 The analytically assumed ADS pump timer value is 6 seconds for RIPS C, G and K.
43	B 3.3.4.1	PTS	Bases for SR 3.3.4.1.7 Frequency	Bases for SR 3.3.4.1.7, Perform CHANNEL FUNCTIONAL TEST for Function 10, Manual ATWS-ARI/SLCS Initiation, state, "However, a relatively short surveillance interval of [7] days is used since availability of manual ATWS-ARI is important for providing a diverse means of inserting all of the control rods and the logic is 2/2. Note: The Frequency is not bracketed in PTS SR 3.3.4.1.7.	n/a	The brackets have been removed because additional flexibility is not supported at this time
44	3.3.4.2	PTS	SR 3.3.4.2.2 Frequency	SR 3.3.4.2.2 Frequency of [92] days for: Perform CHANNEL FUNCTIONAL TEST for Feedwater Pump and Main Turbine Trip Instrumentation (three instrumentation channels and three digital controllers). Bases for SR 3.3.4.2.2 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time
45	3.3.4.2	PTS	Feedwater Pump and Main Turbine Trip Sensor Instrumentation Allowable Value	SR 3.3.4.2.3 Perform SENSOR CHANNEL CALIBRATION for Feedwater Pump and Main Turbine Trip Instrumentation Function channel trip setting Allowable Value for Reactor Vessel Water Level – High, Level 8	3	SCP Discussion See Item 20
46	3.3.4.2	GTS	Type of component actuation	GTS SR 3.3.4.2.4 Perform LOGIC SYSTEM FUNCTIONAL TEST including [valve] actuation. (PTS Rev 2 has "trip" in place of "[valve]")	n/a	STD DEP 16.3-39 will be revised to address testing of the actuated device.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
47	3.3.5.1	PTS	Completion Time for Required Action A.1	PTS 3.3.5.1 Required Action A.1, Restore {automated thermal limit monitor} channel to OPERABLE status in [72] hours. Bases for Completion Time of Required Action A.1	n/a	The brackets will be removed because additional flexibility is not supported at this time
48	3.3.5.1	PTS	Completion Time of Required Action C.1	PTS 3.3.5.1 Required Action C.1, Restore {RWM} channel to OPERABLE status in [72] hours. Bases for Completion Time of Required Action C.1	n/a	The brackets will be removed because additional flexibility is not supported at this time
49	3.3.5.1	PTS	Applicability of automated thermal limit monitor (ATLM) control rod block function	SR 3.3.5.1.1 Note: CHANNEL FUNCTIONAL TEST for ATLM control rod block function "Not required to be performed until 1 hour after THERMAL POWER is > [30] % RTP." Applicability of Function 1.a, ATLM control rod block function in Table 3.3.5.1-1 Footnote (a) "THERMAL POWER > [30] % RTP." GTS has [10] % RTP. SR 3.3.5.1.4 "Verify the ATLM is not bypassed when THERMAL POWER ≥ [30] % RTP." Bases for Applicability of PTS 3.3.5.1 Function 1.a, ATLM	2	Analytically assumed values. RWM = 10% ATLM = 30%
50	3.3.5.1	PTS	SR 3.3.5.1.1 Frequency	SR 3.3.5.1.1 Frequency of [92] days for: Perform CHANNEL FUNCTIONAL TEST for automated thermal limit monitor (ATLM) control rod block function, Function 1.a of Table 3.3.5.1-1. Bases for SR 3.3.5.1.1 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time
51	3.3.5.1	PTS	SR 3.3.5.1.2 Frequency	SR 3.3.5.1.2 Frequency of [92] days for: Perform CHANNEL FUNCTIONAL TEST for Rod Worth Minimizer (RWM) control rod block function, Function 1.b Table 3.3.5.1-1 Bases for SR 3.3.5.1.2 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time
52	B 3.3.5.1	PTS	Range for allowable values for low power setpoint (LPSP) control rod block instrumentation functions, ATLM and RWM	Bases for PTS SR 3.3.5.1.3 and SR 3.3.5.1.4, state "The LPSP is the point where the transition is made between the ATLM and RWM functions. The Allowable Value for the low power setpoint (LPSP) is in the range of [10] % to [30] % RTP." Bases for SR 3.3.5.1.2 Frequency	2	Analytically assumed values.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
53	3.3.5.1	PTS	Applicability of Rod Worth Minimizer (RWM) control rod block function	Applicability of Function 1.b, Rod Worth Minimizer (RWM) control rod block function in Table 3.3.5.1-1 Footnote (b) "With THERMAL POWER $\leq$ [10] % RTP." SR 3.3.5.1.3, "Verify the RWM is not bypassed when THERMAL POWER $\leq$ [10] % RTP." Bases for Applicability of PTS 3.3.5.1 Function 1.b, RWM	2	Analytically assumed values.
54	3.3.5.1	PTS	SR 3.3.5.1.6 Frequency	SR 3.3.5.1.6 Frequency of [24] hours for: Perform CHANNEL CHECK of process parameter and setpoint inputs to the automated thermal limit monitor (ATLM) control rod block function, Function 1.a of Table 3.3.5.1-1. Bases for SR 3.3.5.1.6 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time
55	B 3.3.6.1	PTS	Design description of primary containment isolation valve position post accident monitoring instrumentation	Bases for PTS 3.3.6.1, Table 3.3.6.1-1, Function 8, Primary Containment Isolation Valve (PCIV) Position, contains the following bracketed paragraph: "[For this plant, the PCIV position PAM instrumentation consists of position switches, associated connections and control room indication for active PCIVs. Check valves and manual valves are not required to have position indication.]"	n/a	The bracketed nomenclature is correct and the brackets will be removed.
56	3.3.6.1	PTS	SR 3.3.6.1.1 Frequency	SR 3.3.6.1.1 Frequency of [31] days for post accident monitoring (PAM) instrumentation Functions 1 through 7, 9 through 13: Perform CHANNEL CHECK. Bases for SR 3.3.6.1.1 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time
57	3.3.6.1	PTS	Applicability of Startup Range Neutron Monitor - Neutron Flux post-accident monitoring (PAM) function	Applicability of Function 9, Startup Range Neutron Monitor - Neutron Flux PAM function in Table 3.3.6.1-1 footnote (c) "When power is $\leq$ [10] % RTP." Bases for PTS 3.3.6.1 Function 9 does not discuss Table 3.3.6.1-1 footnote (c).	1	Capability of instrument detection and accuracy

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
58	3.3.6.1	PTS	Applicability of Average Power Range Monitor - Neutron Flux post-accident monitoring (PAM) function	Applicability of Function 10, Average Power Range Monitor - Neutron Flux PAM function in Table 3.3.6.1-1 footnote (d) "When power is > [10] % RTP." Bases for PTS 3.3.6.1 Function 10 does not discuss Table 3.3.6.1-1 footnote (d).	1	Capability of instrument detection and accuracy
59	B 3.3.6.2	PTS	Bases for Completion Time of Required Action A.1	Bases for Completion Time of Required Action A.1 of PTS 3.3.6.2, states "The Required Action is to restore the inoperable division of the Function to OPERABLE status within [90] days." The 90-day Completion Time of Required Action A.1 is not bracketed in PTS 3.3.6.2.	n/a	The brackets have been removed because additional flexibility is not supported at this time
60	3.3.6.2	PTS	SR 3.3.6.2.1 Frequency	SR 3.3.6.2.1 Frequency of [31] days for Remote Shutdown System instrumentation Functions 1 through 23: Perform CHANNEL CHECK for each required instrumentation channel. The bases for SR 3.3.6.2.1 do not bracket the 31-day frequency.	n/a	The brackets will be removed because additional flexibility is not supported at this time
61	3.3.7.1	PTS	CRHA EF System Instrumentation Allowable values	SR 3.3.7.1.3 CHANNEL CALIBRATION for CRHA EF System Instrumentation Function channel trip setting Allowable Values listed in Table 3.3.7.1-1, Functions 1 and 2	3	SCP Discussion See Item 20
62	3.3.7.1	PTS	SR 3.3.7.1.1 Frequency	SR 3.3.7.1.1 Frequency of [24] hours for CRHA EF Instrumentation Function 1, Control Room Ventilation Radiation Monitors: Perform CHANNEL CHECK. Bases for SR 3.3.7.1.1 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time
63	3.3.7.1	PTS	SR 3.3.7.1.2 Frequency	SR 3.3.7.1.2 Frequency of [92] days for CRHA EF instrumentation Functions 2 and 3: Perform CHANNEL FUNCTIONAL TEST. Bases for SR 3.3.7.1.2 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
64	3.3.8.1	PTS	Electrical Power Monitoring Instrumentation Allowable Values	SR 3.3.8.1.2 CHANNEL CALIBRATION for Electrical Power Monitoring Instrumentation Function channel trip setting Allowable Values for Divisions I, II, III, and IV shall be: a. Undervoltage: $\leq [108]$ VAC, b. Overvoltage: $\geq [132]$ VAC, c. Underfrequency: $\leq [57]$ Hz, d. Overfrequency: $\geq [63]$ Hz  Bases for PTS LCO 3.3.8.1 state "The Allowable Values for the instrument settings are based on the power supply providing 60 Hz $\pm$ 5%, and 120 V $\pm$ 10%."	2	The Allowable Values for the instrument settings are based on the power supply providing 60 Hz $\pm$ 5%, and 120V $\pm$ 10%."  These are representative bounding values based on industry accepted practice.
65	3.3.8.1	PTS	SR 3.3.8.1.1 Frequency	SR 3.3.8.1.1 Frequency of [92] days for Electrical Power Monitoring Instrumentation: Perform CHANNEL FUNCTIONAL TEST.  Bases for SR 3.3.8.1.1 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time
66	3.3.8.1	PTS	SR 3.3.8.1.2 Frequency	SR 3.3.8.1.2 Frequency of [92] days for Electrical Power Monitoring Instrumentation: Perform CHANNEL CALIBRATION. The bracketed value does not match the frequency given in the associated bases.  Bases for SR 3.3.8.1.2 Frequency states, "The Frequency is based upon the assumption of an 18 month calibration interval in the determination of the magnitude of equipment drift in the setpoint analysis."	n/a	The Bases are correct. These CHANNEL CALIBRATIONS are typically performed on an 18 month Frequency. Therefore, the bracketed 92 days will be replaced with 18 months.
67	3.3.8.2	PTS	SR 3.3.8.2.1 Frequency	SR 3.3.8.2.1 Frequency of [7] days for Reactor Coolant Temperature Monitoring - Shutdown Instrumentation: Perform CHANNEL CHECK.  Bases for SR 3.3.8.2.1 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time
68	3.3.8.2	PTS	SR 3.3.8.2.2 Frequency	SR 3.3.8.2.2 Frequency of [92] days for Reactor Coolant Temperature Monitoring - Shutdown Instrumentation: Perform CHANNEL FUNCTIONAL TEST.  Bases for SR 3.3.8.2.1 Frequency	n/a	The brackets will be removed because additional flexibility is not supported at this time

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
69	3.4.1	PTS	Alternative number of reactor internal pumps (RIPs) required to be in operation.	<p>LCO 3.4.1 alternative part: [OR ] RIPs may be in operation provided the following limits are applied when the associated LCO is applicable:</p> <p>a. LCO 3.2.1 APLHGR limits specified in the COLR for [ ] RIPs in operation; and</p> <p>b. LCO 3.2.2 MCPR limits specified in the COLR for [ ] RIPs in operation; and</p> <p>c. LCO 3.3.1.1 SSLC Sensor Instrumentation, Function 2.b, Allowable Value is reset for operation with [ ] RIPs.]</p> <p>The phrase "[ ] RIPs" occurs in Bases for PTS 3.4.1, Applicable Safety Analyses, LCO, and Reference sections.</p>	n/a	The bracketed wording will be removed because the optional flexibility to operate with fewer than 9 RIPs is not supported by analysis at this time.
70	B 3.4.1	PTS	Plant specific analysis for alternative number of RIPs operating.	Bases for PTS 3.4.1, Applicable Safety Analyses, refer to Reference 3. Reference 3 states: "[Plant specific analysis for [ ] RIPs operating.]"	n/a	The bracketed wording will be removed because the optional flexibility to operate with fewer than 9 RIPs is not supported by analysis at this time.
71	B 3.4.2	PTS	Surveillance performance condition on minimum steam dome pressure for opening of S/RV when manually actuated.	Bases for SR 3.4.2.2 state, "Adequate pressure at which this test is to be performed is [6.55] MPaG (the pressure recommended by the valve manufacturer). ... 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." Note that this pressure value is not bracketed in PTS SR 3.4.2.2.	1	Representative value based on industry operating experience (950 psig) to allow proper testing without damaging the valve.
72	B 3.4.3	GTS and PTS	Unidentified LEAKAGE flow limit value.	Bases for GTS 3.4.3, Applicable Safety Analyses section states, "The 3.785 L/min limit is a small fraction of the calculated flow from a critical crack in the primary system piping (Ref. 6)." Bases for PTS 3.4.3 replaces "3.785" with "19" per STD DEP 7.3-12, and removes the brackets from the sentence. Note that GTS LCO 3.4.3.b does not bracket the "3.785", which PTS LCO 3.4.3.b replaces with "19."	1	STD DEP 7.3-12 revised the total leakage limit from 95L/min to 114 L/min; unidentified leakage from 3.785 L/min to 19 L/min; and added an additional requirement to ensure that unidentified leakage did not increase more than 8 L/min within the previous 4-hour period.
73	B 3.4.3	GTS and PTS	COL Application for Leak-Before-Break Qualification for Piping Systems	Bases for GTS 3.4.3, Reference section, Reference 6 states, "[COL Application for Leak-Before-Break Qualification for Piping Systems.]" The bases Reference section for PTS 3.4.3 states Reference 6 as "FSAR, Section 5.2.5.5.1."	1	STD DEP 7.3-12 – The Leak Before Break criteria are not applied in this application.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
74	3.4.9	GTS and PTS	Temperature criterion for performing surveillance.	GTS SR 3.4.9.4 Note: Not required to be performed until 30 minutes after RCS temperature $\leq [27^{\circ}\text{C}]$ in MODE 4. Verify reactor vessel flange and head flange temperatures are within the limits specified in the PTLR once every 30 minutes. Note: brackets are removed in PTS. Bases for GTS and PTS SR 3.4.9.4; Note: brackets are removed in PTS bases.	3	The value will be determined during development of the PTLR, which will be provided to the NRC by July 30, 2009.
75	3.4.9	GTS and PTS	Temperature criterion for performing surveillance.	SR 3.4.9.5 Note: Not required to be performed until 12 hours after RCS temperature $\leq [38^{\circ}\text{C}]$ in MODE 4. Verify reactor vessel flange and head flange temperatures are within the limits specified in the PTLR once every 12 hours. Note: brackets are removed in PTS. Bases for GTS and PTS SR 3.4.9.5; Note: brackets are removed in PTS bases.	3	The value will be determined during development of the PTLR, which will be provided to the NRC by July 30, 2009.
76	B 3.5.1.9	GTS and PTS	Surveillance test condition for each automatic depressurization system (ADS) valve	Bases for PTS SR 3.5.1.9. Verify each ADS valve opens when manually actuated, state, "Adequate pressure at which this test is to be performed is [6.55 MPaG] (the pressure recommended by the valve manufacturer) ... 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 $\geq [6.55\text{ MPaG}]$ ." Note that this pressure value is not bracketed in GTS and PTS SR 3.5.1.9.	1	Representative value based on industry operating experience (950 psig) to allow proper testing without damaging the valve.
77	3.5.2	PTS	Minimum water volume and tank level in condensate storage tank for the high pressure core flooder (HPCF) subsystem	SR 3.5.2.2 Verify, for the required High Pressure Core Flooder (HPCF) subsystem, the b. Condensate storage tank water level is $\geq [ ]$ once per 12 hours. Bases for SR 3.5.2.2 state, "verification that ... the HPCF System is aligned to take suction from the CST and the CST contains $\geq [ ]$ liters of water, equivalent to $[ ]$ m, ensures that the HPCF System can supply makeup water to the RPV."	1	The CST minimum required water level of 700,000 L equates to 5.4 m minimum water level for pump NPSH.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
78	B 3.6.1.1	PTS	Maximum allowable leakage rate for the primary containment at reduced pressure.	Applicable Safety Analyses section of bases for PTS 3.6.1.1 states, "The maximum allowable leakage rate for the primary containment ( $L_a$ ) is ... [0.25g] % by weight of the containment air per 24 hours at the reduced pressure of Pt of [124.1] kPaG (Ref. 1)."	1	The containment allowable leakage rate values are dependent on the containment reanalysis that will be provided to the NRC on July 15, 2009.
79	B 3.6.1.1	GTS	Reference to bracketed surveillance requirement	<p>Bases for GTS SR 3.6.1.1.1 state, "Failure to meet air lock leakage testing (SR 3.6.1.2.1), [resilient seal primary containment purge valve leakage testing (SR 3.6.1.3.7),] main steam isolation valve leakage (SR 3.6.1.3.13), or hydrostatically tested valve leakage (SR 3.6.1.3.12) does not necessarily result in a failure of this SR.</p> <p>Note that PTS SR 3.6.1.3.6 is bracketed, even though the reference to it in PTS SR 3.6.1.1.1 bases is no longer bracketed. See item number 82</p> <p>Note that the bases for PTS SR 3.6.1.1.1 also omit "main steam isolation valve leakage (SR 3.6.1.3.13)". The reference would be SR 3.6.1.3.12 in the PTS.</p>	n/a	<p>The Bases brackets will be removed.</p> <p>STD DEP 16.3-44 removes main steam isolation valve leakage from this list.</p>
80	3.6.1.2	GTS and PTS	Air lock door seal gap pressure criterion for air lock leak test surveillance.	<p>GTS SR 3.6.1.2.1 states "The acceptance criteria for air lock testing are: ... For each door, leakage rate is <math>\leq 0.01 L_a</math> when the gap between the door seals is pressurized to <math>\geq [ ]</math> MPaG for at least 15 minutes." PTS gives the gap pressure as [0.0689] MPaG.</p> <p>Bases for GTS and PTS SR 3.6.1.2.1 do not state the gap pressure criterion, but do state: "The acceptance criteria were established [during initial air lock and primary containment OPERABILITY testing]."</p>	1  n/a	<p>The Bases value of 0.0689MPaG is equivalent to 10 psig for pressurizing between the seals and is based on operating experience with this type of seal. This pressure will be verified during initial air lock and primary containment OPERABILITY testing</p> <p>The brackets will be removed from the Bases statement "The acceptance criteria were established [during initial air lock and primary containment OPERABILITY testing]."</p>



Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
81	3.6.1.3	GTS and PTS	Required Action completion time.	<p>GTS 3.6.1.3 [Required Action D.3, Perform SR 3.6.1.3.7 for resilient seal purge valves closed to comply with required Action D.1, Once per [92] days.]</p> <p>Per STD DEP 16.3-71, PTS 3.6.1.3 replaced GTS 3.6.1.3 ACTION D with:</p> <p>Condition D. Purge valve leakage rate, main steam isolation valve leakage or hydrostatically tested line leakage rate not within limit.</p> <p>Required Action D.1, Restore leakage to within limit.</p> <p>Completion Time: [4 hours except for main steam line isolation valve leakage AND 8 hours for main steam line isolation valve leakage.]</p> <p>Per STD DEP 16.3-71, PTS 3.6.1.3 also deleted GTS SR 3.6.1.3.1, which applied only when in GTS 3.6.1.3 Condition D. The other PTS 3.6.1.3 surveillances were renumbered.</p> <p>Fourth paragraph of bases for GTS 3.6.1.3 Required Actions D.1, D.2, and D.3, is bracketed.</p> <p>Per STD DEP 16.3-71, all four GTS bases paragraphs were replaced by one paragraph in bases for PTS 3.6.1.3 Required Action D.1, which do not state the completion times in brackets.</p>	n/a	<p>The completion times are appropriate and the brackets will be removed.</p> <p>STD DEP 16.3-71.</p>
82	3.6.1.3	GTS and PTS	Bracketed surveillance requirement - leak rate testing for primary containment purge valve with resilient seals.	<p>GTS SR 3.6.1.3.7 and PTS SR 3.6.1.3.6 are bracketed.</p> <p>Bases for GTS and PTS SR 3.6.1.3.6 are not in brackets.</p>	n/a	<p>The surveillance is appropriate for this design; therefore, the brackets have been removed.</p>

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
83	3.6.1.3	GTS and PTS	Bracketed surveillance requirement to verify percent open restriction on each 550 mm primary containment purge valve and its value.	GTS 3.6.1.3.14 and PTS SR 3.6.1.3.13, Verify each 550 mm primary containment purge valve is blocked to restrict the valve from opening > [50] %, once per 18 months, are bracketed.  Bases for PTS SR 3.6.1.3.13 states "Verifying each 550 mm primary containment purge valve is blocked to restrict opening to ≤ [50] % is required to ensure that the valves can close under DBA conditions within the times assumed in the analysis of References 2 and 4."	2	The 50% blockage is bounding and the brackets will be removed.
84	B 3.6.1.3	GTS	Disposition of Reviewer's Note in bases for surveillance requirement to verify percent open restriction on each 550 mm primary containment purge valve	Bases for GTS 3.6.1.3.14 Reviewer's Note states, "This SR is only required for those plants with purge valves with resilient seals allowed to be open during [MODE 1, 2, 3, or 4] and having blocking devices that are not permanently installed on the valves."  Bases for PTS SR 3.6.1.3.13 omit the reviewer's note.	n/a	The reviewer's note will be reinserted, the bracketed MODE requirement will be changed to 1, 2 and 3, and the brackets will be removed.
85	B 3.6.1.3	GTS	Bases for surveillance note regarding Applicability of surveillance	Bases for GTS 3.6.1.3.14 state, "[The SR is modified by a Note stating that this SR is only required to be met in MODES 1, 2, and 3.]"	n/a	The information is correct and the brackets have been removed.
86	3.6.3.1	GTS	Surveillance acceptance criteria for hydrogen recombiners.	Bases for PTS 3.6.1.3.13 omit the brackets.  GTS SR 3.6.3.1.1, SR 3.6.3.1.2 and SR 3.6.3.1.4, and bases, contain bracketed acceptance criteria. But PTS Section 3.6 omits GTS 3.6.3.1 and bases per STD DEP T1 2.14-1.	n/a	Specification 3.6.3.1 was removed by STD DEP T1 2.14-1.
87	B 3.6.4.3	GTS	Revision number of bases reference.	Bases reference 5 for GTS 3.6.4.3 is stated as "Regulatory Guide 1.5.2, Rev. [2]. The PTS bases remove the brackets.	n/a	Revision 2 to Regulatory Guide 1.52 is the correct revision; therefore, the brackets have been removed.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
88	3.7.1	GTS and PTS	Ultimate heat sink design detail	<p>GTS 3.7.1 ACTIONS A, B, C and D list "[spray network(s)]" as a part of the UHS system. PTS 3.7.1 ACTIONS A and B replace this with "cooling tower cell(s)".</p> <p>PTS 3.7.1 ACTIONS C and D replace this with "cooling tower". Note that GTS 3.7.1 Required Action C.2 is omitted from PTS 3.7.1 ACTION C per STD DEP 16.3-16.</p> <p>PTS 3.7.1 bases for ACTIONS A, B, and C replace "[spray network(s)]" with "cooling tower cell(s)"; bases for ACTION D replace "[spray network] divisions" with "cooling tower divisions".</p>	n/a	<p>The nomenclature associated with the site-specific design is correct and the brackets will or have been removed.</p> <p>FSAR Subsection 9.2.5.</p>
89	B 3.7.1	GTS and PTS	Ultimate heat sink design details	<p>Background section of bases for GTS 3.7.1, third paragraph, states,</p> <p>"The UHS is [a spray pond with six spray networks. Two spray networks are assigned to each UHS division and are mechanically separated from other divisional networks. The networks and their supply piping are suspended above the pond surface on reinforced concrete columns]. The [spray pond] is sized such that sufficient water inventory is available for all RCW/RSW System post LOCA cooling requirements for a 30 day period with no external makeup water source available (Regulatory Guide 1.27, Ref. 1). Normal makeup for the [spray pond] is provided automatically by the [power cycle heat sink makeup line].</p> <p>Background section of bases for PTS 3.7.1, third paragraph, replaces the GTS bases paragraph with the following, with differences denoted in italics, and contains no brackets.</p> <p><i>"The UHS includes a dedicated water storage basin for each unit. The UHS consists of three mechanically and electrically independent cooling tower divisions designed to remove heat from the respective RCW/RSW division. Each unit's UHS structure consists of six cooling tower cells, of which two cells are dedicated to each of the three UHS divisions. During normal plant operation, all three divisions are in service with one cooling</i></p>	n/a	<p>The nomenclature associated with the site-specific design is correct and the brackets will be removed.</p> <p>FSAR Subsection 9.2.5.</p>

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
90	3.7.1	GTS and PTS	Ultimate heat sink design detail	<p><i>tower cell per division in operation. Each unit's UHS basin is sized such that sufficient water inventory is available for all RCW/RSW System post LOCA cooling requirements for a 30 day period with no external makeup water source available (Regulatory Guide 1.27, Ref. 1). Normal makeup for each UHS basin is provided automatically by the onsite well water.</i></p> <p>In the first sentence of the fourth paragraph of the Background section of the bases for GTS 3.7.1, the PTS bases replace "[spray pond]" with "UHS basin".</p> <p>The last paragraph of the Background section of the bases for GTS 3.7.1 is revised in PTS bases by adding a bracketed phrase in the first sentence, as follows: "Following a DBA or transient, the RCW/RSW System [and UHS cooling tower fans] will operate automatically without operator action."</p>	n/a	<p>The nomenclature associated with the site-specific design is correct, and the brackets have been removed.</p> <p>FSAR Subsection 9.2.5.</p>
91	3.7.1	GTS and PTS	Minimum water level of UHS [spray pond]	<p>GTS SR 3.7.1.1 lists "[spray pond]" as a part of the UHS system.</p> <p>PTS SR 3.7.1.1 replaces "[spray pond]" with "basin".</p> <p>PTS and GTS bases for SR 3.7.1.1 do not include these UHS design details.</p> <p>GTS SR 3.7.1.1, Verify the water level of each UHS [spray pond] is <math>\geq 1</math> m. PTS SR 3.7.1.1, Verify the water level in the UHS basin is <math>\geq [19,28]</math> m.</p> <p>PTS and GTS bases for SR 3.7.1.1 do not include these UHS design details.</p>	1	<p>Value obtained from calculation for water level equivalent to required UHS basin mass of water.</p> <p>FSAR Subsection 9.2.5</p>

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
92	3.7.1	GTS and PTS	Minimum water level of reactor service water (RSW) pump well of the intake structure.	<p>GTS SR 3.7.1.2, Verify the water level in each RSW pump well of the intake structure is <math>\geq</math> [ ] m.</p> <p>PTS SR 3.7.1.2, Verify the water level in the UHS basin is <math>\geq</math> [0.91] m.</p> <p>GTS bases for LCO 3.7.1 state "OPERABILITY of the UHS is based on ... with OPERABILITY of each division requiring a minimum water level at or above elevation [mean sea level (equivalent to an indicated level of <math>\geq</math> [ ] m) and six OPERABLE spray networks].</p> <p>PTS bases for LCO 3.7.1 state "OPERABILITY of the UHS is based on ... with OPERABILITY of each division requiring a minimum water level at or above elevation [23.55] m MSL (equivalent to an indicated level of [19.28] m) and six OPERABLE cooling tower cells.</p>	1	Value obtained from calculation for pump suction head to ensure pump operability.  FSAR Subsection 9.2.5
93	3.7.1	PTS	Maximum reactor service water (RSW) water temperature at the inlet to the reactor building cooling water (RCW) / RSW heat exchangers	<p>GTS &amp; PTS SR 3.7.1.3, Verify the RSW water temperature at the inlet to the RCW / RSW heat exchangers is <math>\leq</math> [33.3] °C.</p> <p>GTS and PTS bases for LCO 3.7.1 state "OPERABILITY of the UHS is based on a maximum RSW water temperature of [33.3] °C ... 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 the designed value of 35°C during a LOCA.</p>	1	The 33.3 is replaced by 32.2.  FSAR Section 9.2, Table 9.2-24.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
94	3.7.1	PTS	Ultimate heat sink design detail	<p>GTS SR 3.7.1.1 refers to "UHS [spray pond]" and GTS SR 3.7.1.4 and SR 3.7.1.5 refer to "UHS [spray network] division", but STP 3&amp;4 uses a cooling tower with a UHS basin. Therefore, corresponding PTS SR 3.7.1.1 refers to "UHS basin" and PTS SR 3.7.1.5 and SR 3.7.1.6 refer to "UHS cooling tower division." In addition, PTS SR 3.7.1.4 is added to test each cooling tower cell fan; however, there seems to be no associated STD DEP in Part 7 of the COLA.</p> <p>PTS 3.7.1 bases for SR 3.7.1.5 replaces "UHS [spray network] division" in GTS bases for SR 3.7.1.4 with "UHS cooling tower division".</p> <p>PTS 3.7.1 bases for SR 3.7.1.6 replaces "UHS [spray network] in each division" in GTS bases for SR 3.7.1.5 with "UHS [cooling tower cell] in each division".</p>	n/a	STD DEP 16.3-16 will be revised to include SR 3.7.1.4 for testing of cooling tower cell fans.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
95	3.7.2	PTS	Ultimate heat sink design detail	<p>GTS SR 3.7.2.1 refers to "UHS [spray pond]" and GTS 3.7.2 Condition A and Required Action A.1, Condition B and Required Actions B.1 and B.2, Condition C, SR 3.7.2.4 and SR 3.7.2.5 refer to "UHS [spray network] division". But STP 3&amp;4 uses a cooling tower with a UHS basin, so PTS SR 3.7.2.1 refers to "UHS basin", and PTS 3.7.2 Condition A and Required Action A.1, Condition B and Required Action B.1, Condition C, SR 3.7.2.5 and SR 3.7.2.6 refer to "UHS cooling tower division". Note that PTS SR 3.7.2.6 mistakenly places brackets around "cooling tower."</p> <p>Note that PTS SR 3.7.2.4 is added to test each cooling tower cell fan; however, there seems to be no associated STD DEP in Part 7 of the COLA.</p> <p>GTS 3.7.2 Required Action B.2 is omitted from PTS 3.7.2 ACTION B per STD DEP 16.3-16.</p> <p>PTS 3.7.2 bases replaces design details in GTS 3.7.2 bases as follows:</p> <p><u>ACTIONS A and B</u>: "[spray network]" replaced with "cooling tower cell"</p> <p><u>ACTION C</u>: "[spray network]" replaced with "cooling tower"</p> <p><u>GTS SR 3.7.2.4 (PTS SR 3.7.2.5)</u>: "[spray network]" replaced with "cooling tower"</p> <p><u>GTS SR 3.7.2.5 (PTS SR 3.7.2.6)</u>: "[spray network]" replaced with "[cooling tower cell]"</p>	n/a	The nomenclature associated with the site-specific design is correct and the brackets will be removed
96	3.7.2	GTS and PTS	Minimum water level of UHS [spray pond]	<p>GTS SR 3.7.2.1, Verify the water level of each UHS [spray pond] is <math>\geq</math> [ ] m.</p> <p>PTS SR 3.7.2.1, Verify the water level in the UHS basin is <math>\geq</math> [19.28] m.</p> <p>PTS and GTS bases for SR 3.7.2.1 do not include a value for this surveillance criterion.</p>	1	Value obtained from calculation for water level equivalent to required UHS basin mass of water. FSAR Subsection 9.2.5

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
97	3.7.2	GTS and PTS	Minimum water level of reactor service water (RSW) pump well of the intake structure.	GTS SR 3.7.2.2, Verify the water level in each RSW pump well of the intake structure is $\geq [ ]$ m. PTS SR 3.7.2.2, Verify the water level in the UHS basin is $\geq [0.91]$ m. PTS and GTS bases for SR 3.7.2.2 do not include a value for this surveillance criterion.	1	Value obtained from calculation for suction head to ensure pump operability. FSAR Subsection 9.2.5
98	3.7.2	PTS	Maximum reactor service water (RSW) water temperature at the inlet to the reactor building cooling water (RCW) / RSW heat exchangers	GTS & PTS SR 3.7.2.3, Verify the RSW water temperature at the inlet to the RCW / RSW heat exchangers is $\leq [33.3]$ deg C. PTS and GTS bases for SR 3.7.2.3 do not include a value for this surveillance criterion.	1	The 33.3 is replaced by 32.2. FSAR Section 9.2, Table 9.2-24.
99	3.7.3	PTS	Ultimate heat sink design detail	GTS SR 3.7.3.1 refers to "UHS [spray pond]" and GTS 3.7.3 Condition A, SR 3.7.3.4, and SR 3.7.3.5 refer to "UHS [spray network] division". But STP 3&4 uses a cooling tower with a UHS basin, so PTS SR 3.7.3.1 refers to "UHS basin", and PTS 3.7.3 Condition A, SR 3.7.3.5 and SR 3.7.3.6 refer to "UHS cooling tower division". Note that SR 3.7.3.6 mistakenly places brackets around "cooling tower." Note that PTS SR 3.7.3.4 is added to test each cooling tower cell fan; however, there seems to be no associated STD DEP in Part 7 of the COLA. PTS 3.7.3 bases replaces design details in GTS 3.7.3 bases as follows: ACTION A: "associated divisional [spray networks]" replaced with "associated UHS cooling tower cells" GTS SR 3.7.3.4 (PTS SR 3.7.3.5): "[spray network]" replaced with "cooling tower" GTS SR 3.7.3.5 (PTS SR 3.7.3.6): "[spray network]" replaced with "[cooling tower cell]"	n/a	The nomenclature associated with the site-specific design is correct and the brackets will be removed. STD DEP 16.3-16 will be revised to include SR 3.7.3.4 for testing of cooling tower cell fans.



Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
100	3.7.3	GTS and PTS	Minimum water level of UHS [spray pond]	GTS SR 3.7.3.1, Verify the water level of each UHS [spray pond] is $\geq [ ]$ m. PTS SR 3.7.3.1, Verify the water level in the UHS basin is $\geq [19.28]$ m. PTS and GTS bases for SR 3.7.3.1 do not include a value for this surveillance criterion.	1	Value obtained from calculation for water level equivalent to required UHS basin mass of water. FSAR Subsection 9.2.5.
101	3.7.3	GTS and PTS	Minimum water level of reactor service water (RSW) pump well of the intake structure.	GTS SR 3.7.3.2, Verify the water level in each RSW pump well of the intake structure is $\geq [ ]$ m. PTS SR 3.7.3.2, Verify the water level in the UHS basin is $\geq [0.91]$ m. PTS and GTS bases for SR 3.7.3.2 do not include a value for this surveillance criterion.	1	Value obtained from calculation for pump suction head to ensure pump operability. FSAR Subsection 9.2.5
102	3.7.3	PTS	Maximum reactor service water (RSW) water temperature at the inlet to the reactor building cooling water (RCW) / RSW heat exchangers	GTS & PTS SR 3.7.3.3, Verify the RSW water temperature at the inlet to the RCW / RSW heat exchangers is $\leq [33.3]$ deg C. PTS and GTS bases for SR 3.7.3.3 do not include a value for this surveillance criterion.	1	The 33.3 is replaced by 32.2. FSAR Section 9.2, Table 9.2-24.
103	B 3.7.7	GTS and PTS	Unit specific documentation containing response time limits for main turbine bypass system	Bases for GTS and PTS SR 3.7.7.3 state, "The response time limits are specified in [unit specific documentation]."	n/a	"Unit specific documentation" will be replaced by "Instrument Setpoint Summary Report," and the brackets will be removed.
104	3.8.1	PTS	Acceptance criteria for diesel generator testing - frequency.	GTS and PTS frequency criteria are $\geq [58.8]$ Hz and $\leq [61.2]$ Hz. SR 3.8.1.2, SR 3.8.1.7, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.15, SR 3.8.1.19, and SR 3.8.1.20 PTS and GTS 3.8.1 bases for these SRs do not include values for these surveillance criteria.	2	Within 2% nominal frequency in accordance with Reg. Guide 1.9, Section C.1.4.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
105	3.8.1	PTS	Acceptance criteria for diesel generator testing - voltage.	GTS voltage criteria are $\geq [6210]$ V and $\leq [7590]$ V. PTS voltage criteria are $\geq [3744]$ V and $\leq [4576]$ V. SR 3.8.1.2, SR 3.8.1.7, SR 3.8.1.11, SR 3.8.1.12, SR 3.8.1.15, SR 3.8.1.19, and SR 3.8.1.20  PTS and GTS 3.8.1 bases for these SRs do not include values for these surveillance criteria.	2	Within 10% nominal voltage in accordance with Reg. Guide 1.9, Section C.1.4.
106	3.8.1	PTS	Acceptance criteria for diesel generator testing - power.	GTS power criteria are $\geq 5000$ kW and $\leq [ ]$ kW. PTS power criteria are $\geq [6480]$ kW and $\leq [7200]$ kW. SR 3.8.1.3, and SR 3.8.1.15 Note 1 (per STD DEP 8.3-1)  Last paragraph of Background section of bases of PTS 3.8.1 replaces GTS value of "5000 kW" with "7200 kW" for diesel generator continuous service rating	2	Diesel generator continuous service rating (7200 kW) minus 10% in accordance with Reg. Guide 1.9.
107	3.8.1	PTS	Minimum fuel oil volume in each day tank.	GTS SR 3.8.1.4, Verify each day tank contains $\geq [ ]$ liters of fuel oil. PTS SR 3.8.1.4, Verify each day tank contains $\geq [16,900]$ liters of fuel oil.  Bases for PTS 3.8.1 do not contain a value for this acceptance criterion.	1	Value obtained by calculation.
108	3.8.1	PTS	Unit power supply - design detail	GTS and PTS SR 3.8.1.8, Verify manual transfer of the [unit power supply] from normal offsite circuit to each required alternate offsite circuit.  Bases for PTS SR 3.8.1.8 states, "Manual transfer of each 4.16 kV ESF bus power supply from the normal offsite circuit to the alternate offsite circuit demonstrates the OPERABILITY of the alternate circuit distribution network to power the shutdown loads."	n/a	The bracketed site-specific nomenclature is correct and the brackets will be removed.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
109	3.8.1	PTS	Test conditions for loads to be rejected. Acceptance criteria for diesel generator load rejection test - maximum frequency following load rejection, and frequency and voltage 3 seconds after load rejection.	<p>SR 3.8.1.9 - Loads to be rejected are revised per STD DEP 8.3-1 :</p> <p>GTS loads to be rejected are: Division 1 " <math>\geq 540</math> kW", Divisions 2 and 3 " <math>\geq 1400</math> kW" PTS loads to be rejected are: Division 1 " <math>\geq 589</math> kW", Divisions 2 and 3 " <math>\geq 1689</math> kW"</p> <p>PTS SR 3.8.1.9a. Following load rejection, the frequency is <math>\leq [66.7]</math> Hz</p> <p>PTS SR 3.8.1.9b. Within 3 seconds following load rejection, the voltage is <math>\geq [3744]</math> V and <math>\leq [4576]</math> V.</p> <p>PTS SR 3.8.1.9c. Within 3 seconds following load rejection, the frequency is <math>\geq [58.8]</math> Hz and <math>\leq [61.2]</math> Hz.</p> <p>Bases for PTS 3.8.1 do not contain values for the acceptance criteria.</p>	2	<p>Within 10% nominal voltage and 2% nominal frequency. Although not specifically stated, these industry accepted values were derived from Reg. Guide 1.9, Section C.1.4.</p> <p>IEEE 308 and 387, Section 6.2.1 states the load rejection test is acceptable if the increase in diesel speed does not exceed 75% of the difference between normal speed and the overspeed trip setpoint, or 15% above normal speed, whichever is lower.</p>
110	3.8.1	PTS	Acceptance criterion for diesel generator testing - maximum voltage during and following load rejection	<p>GTS SR 3.8.1.10. Verify each DG operating at a power factor <math>\leq 0.9</math> does not trip and voltage is maintained <math>\leq [ ]</math> V during and following a load rejection of a load <math>\geq [5000]</math> V and <math>\leq [ ]</math> kW.</p> <p>PTS SR 3.8.1.10. Verify each DG operating at a power factor <math>\leq 0.9</math> does not trip and voltage is maintained <math>\leq [4784]</math> V during and following a load rejection of a load <math>\geq [6480]</math> kW and <math>\leq [7200]</math> kW.</p> <p>Bases for PTS 3.8.1 do not contain values for the acceptance criteria.</p>	2	<p>Less than 115% (4784 v) and within 10% nominal voltage and 2% nominal frequency in accordance with Reg. Guide 1.9, Section C.1.4.</p>

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
111	3.8.1	GTS and PTS	Acceptance criteria for diesel generator testing - load profile for 24-hour run	<p>GTS SR 3.8.1.14, Verify each DG operating at a power factor <math>\leq 0.9</math>, operates for <math>\geq 24</math> hours: a. For <math>\geq 2</math> hours loaded, <math>\geq 5225</math> kW and <math>\leq 5500</math> kW; and b. For the remaining hours of the test loaded <math>\geq 5000</math> kW and <math>\leq [ ]</math>.</p> <p>Per STD DEP 8.3-1, unbracketed load values are revised:</p> <p>PTS SR 3.8.1.14, Verify each DG operating at a power factor <math>\leq 0.9</math>, operates for <math>\geq 24</math> hours: a. For <math>\geq 2</math> hours loaded, <math>\geq 7560</math> kW and <math>\leq 7920</math> kW; and b. For the remaining hours of the test loaded <math>\geq [6480]</math> kW and <math>\leq [7200]</math> kW.</p> <p>Bases for PTS 3.8.1 do not contain values for the acceptance criteria.</p>	2	<p>2-hr test - between 105% and 110% of continuous rating in accordance with Reg. Guide 1.9, Section 2.2.9.</p> <p>22-hour test - between 90% and 100% of continuous rating in accordance with Reg. Guide 1.9, Section 2.2.9.</p> <p>STD DEP 8.3-1</p>
112	3.8.1	GTS	Reference to Regulatory position in RG 1.9, Revision 3	<p>GTS Table 3.8.1-1, DG Test Schedule, Note (b) states "This is consistent with Regulatory Position [ ], of RG 1.9, Revision 3." PTS Table 3.8.1-1 Note (b) omits this statement.</p> <p>Bases for Table 3.8.1-1 do not reference specific regulatory positions in RG 1.9, Rev. 3.</p>	n/a	<p>STD DEP 16.3-49 deleted this statement. RG 1.9 is silent on the seven consecutive failure-free starts.</p>
113	B 3.8.1	GTS and PTS	Performance criteria for a functional combustion turbine generator (CTG), steady state voltage and frequency	<p>Bases for PTS 3.8.1 Required Actions B.3, C.4, E.1, and F.1 replace CTG performance criteria in the Bases for GTS 3.8.1 Required Actions B.3, C.4, E.1, and F.1 as follows (See STD DEP 8.3-1):  <u>Steady state voltage: "≥ [6210] V and ≤ [7590] V" is replaced with "≥ [12.42] kV and ≤ [15.18] kV"</u>  <u>Frequency: "≥ [58.8] Hz and ≤ [61.2] Hz in less than 2 minutes" is replaced with "≥ [58.8] Hz and ≤ [61.2] Hz in less than 10 minutes".</u></p> <p>Bases for PTS 3.8.1 Required Actions B.3, C.4, E.1, and F.1</p>	2	<p>Within 10% nominal voltage and 2% nominal frequency. Although not specifically stated, these industry accepted values were derived from Reg. Guide 1.9, Section C.1.4.</p> <p>STD DEP 8.3-1</p>
114	B 3.8.1	GTS and PTS	Bases for voltage and frequency tolerances for diesel generators	<p>Second paragraph of bases for surveillance requirements for GTS and PTS 3.8.1 regarding voltage and frequency tolerances for AC sources is bracketed. PTS revised numbers based on STD DEP 8.3-1.</p>	2	<p>The brackets will be removed from this paragraph.</p> <p>STD DEP 8.3-1</p>

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
115	3.8.1	GTS and PTS	Surveillance note regarding MODE restrictions for performing DG load rejection surveillance, and disposition of associated reviewer's note in bases	GTS and PTS SR 3.8.1.9 Notes 1 and 2 are bracketed. The same Notes are contained in SR 3.8.1.10, but are not bracketed. Note 1 specifies "This Surveillance shall not be performed in MODE 1 or 2."  Bases for GTS and PTS SR 3.8.1.9 and SR 3.8.1.10 contain a bracketed Reviewer's Note associated with surveillance Note 1 regarding MODE restrictions for performing DG load rejection surveillance.	n/a	The brackets will be removed because additional flexibility is not supported at this time.
116	B 3.8.1	GTS and PTS	Surveillance note regarding MODE restrictions for performing DG automatic trip bypass on loss of voltage with an ECCS initiation signal surveillance; load sequence timer surveillance; and associated reviewer's notes in bases.	GTS and PTS SR 3.8.1.13 Notes 1 and 2 are not bracketed, but the bases for SR 3.8.1.13 contain a bracketed Reviewer's Note associated with surveillance Note 1 regarding MODE restrictions for performing the DG surveillance.  GTS and PTS SR 3.8.1.18 Notes 1 and 2 are not bracketed, but the bases for SR 3.8.1.18 contain a bracketed Reviewer's Note associated with surveillance Note 1 regarding MODE restrictions for performing the load sequencer timer surveillance.	n/a	The brackets will be removed because additional flexibility is not supported at this time.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
117	3.8.3	GTS and PTS	Limits on fuel oil storage tank level, lube oil inventory, and starting air receiver pressure	<p>PTS 3.8.3 Condition A. One or more DGs with fuel oil level <math>\leq</math> [380,000] liters and <math>\geq</math> [350,000] liters in storage tank.</p> <p>Condition B. One or more DGs with lube oil inventory <math>&lt;</math> [7,300] liters and <math>\geq</math> [6,700] liters.</p> <p>Condition E. One or more DGs with pressure in at least one (STD DEP 16.3-51) starting air receiver <math>&lt;</math> [3,000] kPaG and <math>\geq</math> [2,700] kPaG.</p> <p>Required Action E.1, Restore starting air receiver pressure to <math>\geq</math> [3,000] kPaG.</p> <p>SR 3.8.3.1, Verify each fuel oil storage tank contains <math>\geq</math> [380,000] liters. SR 3.8.3.2, Verify lube oil inventory for each DG is <math>\geq</math> [7,300] liters.</p> <p>SR 3.8.3.4, Verify each ("required" deleted per STD DEP 16.3-51) DG air start receiver pressure is <math>\geq</math> [3,000] kPaG.</p> <p>Note that GTS 3.8.3 contains no values in the corresponding brackets.</p> <p>Bases for PTS 3.8.3:                      Required Action B.1 bases states, "With lube oil inventory <math>&lt;</math> [7,300] liters ..."                      Required Action E.1 bases states, "With starting air receiver pressure <math>&lt;</math> [3,000] MPaG, sufficient capacity for five successive DG start attempts does not exist. However, as long as the receiver pressure is <math>&gt;</math> [2,700] MPaG, there is adequate capacity for at least one start attempt ..."                      SR 3.8.3.2 bases states, "The [7,300] liter requirement is based on the DG manufacturer's consumption values for the run time of the DG."                      Note that the GTS 3.8.3 bases contain no values in the corresponding brackets.</p>	1	Values obtained by calculation.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
118	B 3.8.3	GTS and PTS	ASTM standards for new fuel oil	<p>Bases for PTS SR 3.8.3.3 state:</p> <p>"The tests, limits, and applicable ASTM Standards are as follows:</p> <ul style="list-style-type: none"> <li>a. Sample the new fuel oil in accordance with ASTM D4057-[06] (Ref. 6);</li> <li>b. Verify in accordance with the tests specified in ASTM D975-[08] (Ref. 6) that the sample has an absolute specific gravity at [15.6/15.6°C of <math>\geq 0.83^\circ</math> and <math>\leq 0.89^\circ</math> (or an API gravity at 15.6°C of <math>\geq 27^\circ</math> and <math>\leq 39^\circ</math>), a kinematic viscosity at 40°C of <math>\geq 1.9</math> mm<sup>2</sup>/s and <math>\leq 4.1</math> mm<sup>2</sup>/s, and a flash point of <math>\geq 51.7^\circ</math>C]; and</li> <li>c. Verify that the new fuel oil has a clear and bright appearance with proper color when tested in accordance with ASTM D4176-[04] (Ref. 6)." <p>"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-[08] (Ref. 6) are met for new fuel oil when tested in accordance with ASTM D975-[08] (Ref. 6), except that the analysis for sulfur may be performed in accordance with ASTM D1552-[07] (Ref. 6) or ASTM D2622-[08] (Ref. 6)."</p> <p>"Particulate concentrations should be determined in accordance with ASTM D2276-[06], Method A (Ref. 6)."</p> <p>"6. ASTM Standards: D4057-[06]; D975-[08]; D4176-[04]; D975-[08]; (D1552-[07]; D2622-[08]; D2276-[06]."</p> <p>Note that the GTS bases contain no values in the brackets for ASTM standards.</p> </li></ul>	n/a	The bracketed information (ASTM revision numbers) is correct and the brackets will be removed.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
119	3.8.4	PTS	Battery surveillance acceptance criteria for minimum battery terminal voltage on float charge and maximum connection resistance for inter-cell, inter-rack, and inter-tier connections, and for terminal connections.	<p>PTS SR 3.8.4.1, Verify battery terminal voltage is <math>\geq</math> [129] V on float charge. PTS SR 3.8.4.2, Verify no visible corrosion on terminals and connectors OR Verify connection resistance is <math>\leq</math> [1.5E-4] ohms for inter-cell, inter-rack, and inter-tier connections, and <math>\leq</math> [1.5E-4] ohms for terminal connections.</p> <p>PTS SR 3.8.4.5, Verify connection resistance is <math>\leq</math> [1.5E-4] ohms for inter-cell, inter-rack, and inter-tier connections, and <math>\leq</math> [1.5E-4] ohms for terminal connections.</p> <p>Bases for PTS 3.8.4 surveillances do not contain values for the acceptance criteria.</p>	2	These values were taken from NUREG-1434 Rev. 1, and are considered representative of the values expected for the STP 3 & 4 batteries.
120	3.8.4	PTS	Battery charger surveillance acceptance criterion for current.	<p>PTS SR 3.8.4.6, Verify each required battery charger supplies <math>\geq</math> [400] amps at <math>\geq</math> 125 V for <math>\geq</math> 12 hours.</p> <p>Bases for PTS 3.8.4 surveillances do not contain values for the acceptance criteria.</p>	2	These values were taken from NUREG-1434 Rev. 1, and are considered representative of the values expected for the STP 3 & 4 batteries.
121	3.8.6	PTS	Battery cell parameter verification surveillance conditional frequencies based on discharge and overcharge voltage limits.	<p>PTS SR 3.8.6.2 Frequency: Once within 24 hours after battery discharge &lt; [110] V AND Once within 24 hours after battery overcharge &gt; [150] V</p> <p>Bases for PTS SR 3.8.6.2 state, "In addition, within 24 hours of a battery discharge &lt; [110] V or a battery overcharge &gt; [150] V, the battery must be demonstrated to meet Category B limits."</p> <p>GTS bases contain no values in the brackets.</p>	2	These values were taken from NUREG-1434 Rev. 1, and are considered representative of the values expected for the STP 3 & 4 batteries.



Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
122	3.8.6	PTS	Battery cell parameter limits on specific gravity, and limitations on use of maximum charging current in lieu of specific gravity.	<p>PTS Table 3.8.6-1, CATEGORY A: LIMITS FOR EACH DESIGNATED PILOT CELL, Specific Gravity <math>\geq</math> [1.195]; CATEGORY B: LIMITS FOR EACH CONNECTED CELL, Specific Gravity <math>\geq</math> [1.190] AND Average of all connected cells <math>&gt;</math>[1.200]; CATEGORY C: LIMITS FOR EACH CONNECTED CELL, Specific Gravity - Not more than 0.020 below average of all connected cells AND Average of all connected cells <math>&gt;</math>[1.190].</p> <p>Footnote (c) on Specific Gravity: Or battery charging current is <math>&lt;</math> [2] amps when on float charge. This is acceptable only during a maximum of [7] days following a battery recharge.</p> <p>GTS Table 3.8.6.1 contains no values in the brackets. Bases for PTS Table 3.8.6-1 state,</p> <p>"The Category A limit specified for specific gravity for each pilot cell is <math>\geq</math> [1.195] ..."</p> <p>"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 [7] days following a battery recharge."</p> <p>"The Category B limit specified for specific gravity for each connected cell is <math>\geq</math> [1.190] (0.020 below the manufacturer's fully charged, nominal specific gravity) with the average of all connected cells <math>&gt;</math> [1.200] (0.010 below the manufacturer's fully charged, nominal specific gravity)."</p> <p>"The Category C limit for average specific gravity (<math>\geq</math> [1.190]) ..."</p> <p>GTS bases contain no value in the brackets.</p>	2	These values were taken from NUREG-1434 Rev. 1, and are considered representative of the values expected for the STP 3 & 4 batteries.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
123	B 3.8.11	GTS and PTS	Performance criteria for a functional combustion turbine generator (CTG), steady state voltage and frequency	Bases for PTS 3.8.11 Required Action B.1 replace CTG performance criteria in the Bases for GTS 3.8.11 Required Action B.1 as follows (See STD DEP 8.3-1): <u>Steady state voltage:</u> "≥ [6210] V and ≤ [7590] V" is replaced with "≥ [12.42] kV and ≤ [15.18] kV" <u>Frequency:</u> "≥ [58.8] Hz and ≤ [61.2] Hz in less than 2 minutes" is replaced with "≥ [58.8] Hz and ≤ [61.2] Hz in less than 10 minutes".	2	Within 10% nominal voltage and 2% nominal frequency. Although not specifically stated, these industry accepted values were derived from reg. Guide 1.9, Section C.1.4.
124	3.9.5	GTS and PTS	Minimum pressure in control rod scram accumulator	In accordance with STD DEP 16.3-15, PTS SR 3.9.5.2 replaces the GTS value of 10.49 MPaG for the minimum control rod scram accumulator pressure with 12.75 MPaG. (Note that this value is not designated as COL information in the GTS.)  Bases for both PTS and GTS SR 3.9.5.2 state, "Because no explicit analysis exists for automatic shutdown during refueling, the shutdown function is satisfied if the withdrawn control rod is capable of automatic insertion and the associated CRD scram accumulator pressure is ≥ 12.75 MPaG."	1	STD DEP 16.3-15
125	B 3.10.9	GTS and PTS	Number of reactor internal pumps (RIPs) in operation.	GTS and PTS 3.10.9 Applicability is "MODES 1 and 2 with less than nine RIPs in operation." The bases for GTS and PTS 3.10.9, in sections for BACKGROUND, APPLICABLE SAFETY ANALYSES, LCO, APPLICABILITY, and ACTIONS, include the phrase "[nine] RIPs".	n/a	LCO 3.4.1 requires at least nine RIPs to be in Operation; therefore, the brackets will be removed.
126	4.1.1	GTS and PTS	Reference to description of site and exclusion area boundaries	GTS 4.1.1, The site and exclusion area boundaries [shall be as described or as shown in Figure 4.1-1]. PTS 4.1.1, The site and exclusion area boundaries are as shown in FSAR Figure 2.1S-3. Also, PTS 4.0 omits GTS [Figure 4.1-1].	1	FSAR Figure 2.1S-3 shows the site and exclusion area boundaries.
127	4.1.2	GTS and PTS	Reference to description of Low Population Zone (LPZ).	GTS 4.1.2, The LPZ [shall be as described or as shown in Figure 4.1-2]. PTS 4.1.2, The LPZ is as shown in FSAR Figure 2.1S-3. Also, PTS 4.0 omits GTS [Figure 4.1-2].	1	FSAR Figure 2.1S-3 shows the LPZ.
128	4.3.1.2	PTS	Nominal center to center distance between fuel assemblies placed in storage racks.	PTS 4.3.1.2.d, Nominal [approximately 16] cm center to center distance between fuel assemblies placed in storage racks.	1	The "approximately 16" is correct and the brackets will be removed.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
129	5.1.1	GTS and PTS	Title of position responsible for overall unit operation.	PTS 5.1.1 replaces "[Plant Superintendent]" with "Plant General Manager."	n/a	Actual personnel titles have been inserted.
130	5.1.2	GTS and PTS	Title of position responsible for control room command function, and title of person signing the notice of who has the control room command function.	PTS 5.1.2 replaces "[Shift Supervisor (SS)]" with "Shift Supervisor / Manager," and replaces "[highest level of corporate or site management]" with "President & Chief Executive Officer."	n/a	Actual personnel titles have been inserted.
131	5.2.1	GTS and PTS	Reference to document where onsite and offsite organizational requirements are documented.	PTS 5.2.1.a replaces "[applicant's FSAR]" with "FSAR or the Quality Assurance Program Description (QAPD)"	n/a	More specific identification of requested reference documentation has been made.
132	5.2.1	GTS and PTS	Title of position responsible for overall safe operation of the plant.	PTS 5.2.1.b replaces "[Plant Superintendent]" with "Plant General Manager."	n/a	Actual personnel titles have been inserted.
133	5.2.1	GTS and PTS	Title of corporate executive position with corporate responsibility for overall plant nuclear safety.	PTS 5.2.1.c replaces "[a specified corporate executive position]" with "President & Chief Executive Officer."	n/a	Actual personnel titles have been inserted
134	5.2.2	GTS and PTS	Unit staff titles.	PTS 5.2.2.a replaces "auxiliary operator" with "non-licensed operator" per STD DEP 16.5-2. PTS 5.2.2.c replaces "[Health Physics Technician]" with "Radiation Protection Technician."	n/a	STD DEP 16.5-2
135	5.2.2	GTS and PTS	Control room staffing requirements.	Per STD DEP 16.5-1, PTS 5.2.2.b requires one licensed Senior Reactor Operator (SRO) to be present in the control room while the unit is in MODE 1, 2, or 3. GTS 5.2.2.b also requires an SRO in MODE 4. Note that this is not designated as a COL information item in the GTS.	n/a	STD DEP 16.5-1

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
136	5.2.2	GTS and PTS	Administrative requirements limiting working hours of unit staff performing safety related functions.	PTS 5.2.2.d contains proposed site-specific requirements. Note: These should be evaluated against approved TSTF-511 and 10 CFR Part 26.	n/a	New STD DEP 16.5.5 is being developed to address unit staff working hours in accordance with TSTF-511.
137	5.2.2	GTS and PTS	Title of position requiring the person to hold an active SRO license.	PTS 5.2.2.e replaces "The Operations Manager or Assistant Operations Manager" with "The Operations Division Manager." Note that this is not designated as a COL information item in the GTS.	n/a	The statement "[The Operations Manager or Assistant Operations Manager]" is bracketed in the DCD and therefore is considered COL License Information. The actual personnel title has been inserted.
138	5.2.2	GTS and PTS	Title of position that the Shift Technical Advisor shall provide advisory technical support.	PTS 5.2.2.f replaces "[Shift Supervisor (SS)]" with "Shift Supervisor / Manager." Note that this is not designated as a COL information item in the GTS.	n/a	The term "[Shift Supervisor (SS)]" is bracketed in all other locations (e.g., Specification 5.1.2); and therefore is considered COL License Information. The actual personnel title has been inserted.
139	5.3.1	GTS and PTS	Unit staff qualification standard.	PTS 5.3.1 contains proposed site-specific requirement for unit staff qualifications. It states, "Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971."	n/a	The reference is correct and the brackets have been removed.
140	5.5.1.1	GTS and PTS	Generic Letter reference.	PTS 5.5.1.1.b removed the brackets from "[Generic Letter 82-33]".	n/a	The reference is correct and the brackets have been removed.
141	5.5.2.1	GTS and PTS	Title of position that approves licensee-initiated changes to the ODCM.	PTS 5.5.2.1.b replaces "[Plant Superintendent]" with "Plant General Manager."	n/a	Actual personnel titles have been inserted
142	5.5.2.7	GTS and PTS	Document providing basis for Ventilation Filter Test Program ESF filter ventilation system test frequencies.	PTS 5.5.2.7 replaces "frequencies specified in [Regulatory Guide ], and in accordance with Regulatory Guide 1.52, Revision 2; ASME N510-1989; and AG-1-1991" with "frequencies specified in Regulatory Guide 1.52, Revision 2, and in accordance with Regulatory Guide 1.52, Revision 2 and ASME N510-1989 as specified below:" Note, omission of "AG-1-1991" does not appear to be addressed by a STD DEP.	n/a	"AG-1-1991" should remain and will be reinserted.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
143	5.5.2.7	GTS and PTS	VFTP inplace test criteria for ESF ventilation system HEPA filters.	<p>PTS 5.5.2.7.a replaces "shows a penetration and system bypass &lt; [0.05]%" at the system flowrate specified below [<math>\pm 10</math>]%: Control Room Habitability System Flowrate [ ] Standby Gas Treatment System Flowrate [ ]" with</p> <p>"shows a penetration and system bypass &lt; 0.05% . . . at the system flowrate specified below <math>\pm 10</math>%: Control Room Habitability System Flowrate [ 5,100 m<sup>3</sup>/h ] Standby Gas Treatment System Flowrate [ 6,800 m<sup>3</sup>/h ]"</p>	1	<p>RG 1.52, Rev 2 Section C and ASME N510-1989 Section 8.6.1 for tolerances</p> <p>Flowrate values obtained by calculation.</p>
144	5.5.2.7	GTS and PTS	VFTP inplace test criteria for ESF ventilation system charcoal adsorbers.	<p>PTS 5.5.2.7.b replaces "shows a penetration and system bypass &lt; [0.05]%" at the system flowrate specified below [<math>\pm 10</math>]%: Control Room Habitability System Flowrate [ ] Standby Gas Treatment System Flowrate [ ]" with</p> <p>"shows a penetration and system bypass &lt; 0.05% . . . at the system flowrate specified below <math>\pm 10</math>%: Control Room Habitability System Flowrate [ 5,100 m<sup>3</sup>/h ] Standby Gas Treatment System Flowrate [ 6,800 m<sup>3</sup>/h ]"</p>	1	<p>RG 1.52, Rev 2 Section C and ASME N510-1989 Section 8.6.1 for tolerances</p> <p>Flowrate values obtained by calculation.</p>

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
145	5.5.2.7	GTS and PTS	VFTP laboratory test criteria for ESF ventilation system charcoal adsorber sample.	<p>PTS 5.5.2.7.c replaces "shows the methyl iodide penetration less than the value specified below when tested in accordance with [ASTM D3803-1989] at a temperature of <math>\leq</math> [30°C] and greater than or equal to the relative humidity specified below:                      Control Room Habitability System Penetration [ ] RH [ ]                      Standby Gas Treatment System Penetration [ ] RH [ ]"</p> <p>with</p> <p>"shows the methyl iodide penetration less than the value specified below when tested in accordance with ASTM D3803-1989 at a temperature of <math>\leq</math> 30°C and greater than or equal to the relative humidity specified below: Control Room Habitability System Penetration 0.175 RH 70%                      Standby Gas Treatment System Penetration 0.175 RH 70%"</p>	1	Temperature - ASTM D3803-1989 Penetration and Relative Humidity values obtained by calculation.
146	5.5.2.7	GTS and PTS	Disposition of Reviewer's Note regarding allowable penetration.	<p>GTS 5.5.2.7.c [Reviewer's Note: Allowable penetration = [100% methyl iodide efficiency for charcoal credited in staff safety evaluation] / (safety factor). Safety factor = [5] for systems with heaters.]</p>	n/a	The Reviewer's Note will be reinserted and the brackets removed.
147	5.5.2.7	GTS and PTS	VFTP criteria for maximum pressure drop across combined HEPA filters, the prefilters, and the charcoal adsorbers.	<p>GTS 5.5.7.d specifies a pressure drop at the system flow rate specified below [<math>\pm</math> 10%]:                      Control Room Habitability System Delta P [ ] Flowrate [ ]                      Standby Gas Treatment System Delta P [ ] Flowrate [ ]                      PTS 5.5.7.d specifies a pressure drop at the system flow rate specified below <math>\pm</math> 10%:                      Control Room Habitability System Delta P [1,745.8 Pa] Flowrate [5,100 m<sup>3</sup>/h]                      Standby Gas Treatment System Delta P [2,174.9 Pa] Flowrate [6,800 m<sup>3</sup>/h]</p>	1	ASME N510-1989 Section 8.6.1 for flowrate tolerance of 10 %. Flowrate values obtained by calculation.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
148	5.5.2.7	GTS and PTS	VFTP criteria for energy dissipation by ESF ventilation system heaters.	GTS 5.5.7.e. Demonstrate that the heaters for each of the ESF systems dissipate the value specified below [ $\pm 10\%$ ] when tested in accordance with ASME N510-1989: Control Room Habitability System Wattage [ ] Standby Gas Treatment System Wattage [ ]  PTS 5.5.7.e. Demonstrate that the heaters for each of the ESF systems dissipate the value specified below $\pm 10\%$ when tested in accordance with ASME N510-1989: Control Room Habitability System Wattage [65.6 kW ] Standby Gas Treatment System Wattage [26.2 kW ]	1	ASME N510-1989 Section 8.6.1 for flowrate tolerance of 10 %.  Wattage values obtained by calculation.
149	5.7.1.1	GTS and PTS	Note for multiple-unit site on Annual Report format; when to submit initial report.	PTS 5.7.1.1 removed the brackets from the note, and also from statement "The initial report shall be submitted by April 30 of the year following initial criticality." Note that the GTS stated Mar 31. This is changed to April 30 per STD DEP 16.5-4. PTS 5.7.1.1 also removed bracketed placeholder for other unit unique annual reports; none were listed.	n/a	The bracketed placeholder 5.7.1.1 (b) will be reinserted and the brackets removed.
150	5.7.1.2	GTS and PTS	Note for multiple unit site on Annual Radiological Environmental Operating Report format; other report bracketed details regarding format, and TLD location and exposure period.	PTS 5.7.1.2 removed the brackets from the note and instructions on format in GTS 5.7.1.2, but deleted the TLD requirement, apparently without explanation for the deletion.	n/a	The TLD requirement was removed as a result of SECY-97-169-P, September 8, 1997, "Change to the Independent Radiation Monitoring Program Under Which the NRC Contracts with States to Monitor the Environment Around NRC-Licensed Facilities."
151	5.7.1.2	GTS and PTS	Note for multiple unit site on annual Radiological Effluent Release Report format.	PTS 5.7.1.2 removed the brackets from the note in GTS 5.7.1.2 on format.	n/a	The "NOTE" applies and the brackets were removed.
152	5.7.1.5	GTS and PTS	Individual specifications that address core operating limits.	PTS 5.7.1.5.a lists the specifications that address core operating limits.	n/a	The specifications that address core operating limits have been listed and the brackets removed.

Item No.	PTS Subsection	Source	Site-Specific Information	PTS Requirements	Option	Resolution
153	5.7.1.5	PTS	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.	PTS 5.7.1.5.b provides the following: "[10 CFR 50, Appendix G and Regulatory Guide 1.99]"	n/a	"10 CFR 50, Appendix G and Regulatory Guide 1.99" will be replaced with NEDE-24011-P-A, "General Electric Standard Application on Fuel," September 1988," and the brackets will be removed.
154	5.7.1.6	GTS and PTS	Individual specifications that address the reactor vessel pressure and temperature limits and the heatup and cooldown rates.	PTS 5.7.1.6 states, "LOCO 3.4.9, RCS Pressure and Temperature (P/T) Limits addresses the reactor vessel pressure and temperature limits and the heatup and cooldown rates."	n/a	The referenced LCO is correct and the brackets have been removed.
155	5.7.1.6	PTS	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.	PTS 5.7.1.6 states, "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 [Regulatory Guide 1.99, Revision 2, and in accordance with 10 CFR 50, Appendix G]."	n/a	"Regulatory Guide 1.99, Revision 2 and in accordance with 10 CFR 50, Appendix G" will be replaced with SIR-05-044-A, "Pressure-Temperature Limits Report Methodology for Boiling Water Reactors," dated April 2007
156	5.7.2	GTS and PTS	Bracketed statement regarding Special Reports	PTS 5.7.2 deleted the statement in GTS 5.7.2.	n/a	The bracketed statement regarding "Special Reports" was lined out because no Special Reports, other than the ones identified in 5.7.2 (a) and (b) are anticipated at this time. However, because this statement is similar to a "Reviewer's Note" in NUREG 1434, it will be reinserted and the brackets will be removed.