

## PMSTPCOL PEmails

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**From:** Joseph, Stacy  
**Sent:** Thursday, July 16, 2009 12:36 PM  
**To:** 'Cashell, George S'  
**Cc:** STPCOL  
**Subject:** Draft RAIs Related to SRP Section 16  
**Attachments:** RAI 3045.doc; RAI 3047.doc; RAI 3071.doc; RAI 3072.doc; RAI 3073.doc; RAI 3075.doc; RAI 3076.doc

Steve,

Please see the attached 7 draft RAIs. Please review and let me know if STP requires a telecon with the technical reviewers for clarification.

The 7 attachments are for RAIs:

3045  
3047  
3071  
3072  
3073  
3075  
3076

Please let me know if you have NOT received any of the RAIs listed above.

Thank you,

Stacy Joseph  
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<b>Files</b>	<b>Size</b>	<b>Date &amp; Time</b>
MESSAGE	549	7/16/2009 12:35:57 PM
RAI 3045.doc	31226	
RAI 3047.doc	30202	
RAI 3071.doc	30202	
RAI 3072.doc	33274	
RAI 3073.doc	30202	
RAI 3075.doc	56826	
RAI 3076.doc	32250	

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Request for Additional Information No. 3045 Revision 0

South Texas Project Units 3 and 4  
South Texas Project Nuclear Operating Co  
Docket No. 52-012 and 52-013  
SRP Section: 16 - Technical Specifications  
Application Section: 3.7 Plant Systems

QUESTIONS for Technical Specification Branch (CTSB)

16-\*\*\*

Provide a standard departure report for the addition of SR 3.7.1.4. Proposed changes to the technical specifications require NRC approval. SR 3.7.1.4, Operate each cooling tower cell fan for greater than or equal to 15 minutes once per 31 days, is not a part of the GTS and requires justification for inclusion in the PTS. Provide the justification for SR 3.7.1.4.

This question also applies to PTS SR 3.7.2.4 and SR 3.7.3.4.

16-\*\*\*

Revise SR 3.7.1.2 to verify the water level in the RSW pump well. Currently, PTS SR 3.7.1.1 and SR 3.7.1.2 require verification of the water level in the UHS basin. PTS SR 3.7.1.2 should correspond to GTS SR 3.7.1.2, requiring verification of the water level in the RSW pump well. Revise PTS SR 3.7.1.2 to require verification of RSW pump well water level.

16-\*\*\*

The applicant is requested to justify, in a STD DEP, replacing GTS SR 3.7.2.2, to verify the water level in the RSW pump well, with PTS SR 3.7.2.2, to verify the water level in the UHS basin.

16-\*\*\*

The applicant is requested to justify, in a STD DEP, replacing GTS SR 3.7.3.2, to verify the water level in the RSW pump well, with PTS SR 3.7.3.2, to verify the water level in the UHS basin.

16-\*\*\*

The applicant is requested to justify, in a STD DEP, revising GTS 3.7.7 Required Action B.1 by replacing "<" with "<=" in PTS 3.7.7 Required Action B.1. PTS 3.7.7 Action B.1 states that thermal power should be reduced to <= 40% RTP. GTS Required Action B.1 states that thermal power should be reduced to < 40% RTP.



Request for Additional Information No. 3047 Revision 0

South Texas Project Units 3 and 4  
South Texas Project Nuclear Operating Co  
Docket No. 52-012 and 52-013  
SRP Section: 16 - Technical Specifications  
Application Section: 3.9 Refueling Operations

QUESTIONS for Technical Specification Branch (CTSB)

16-\*\*\*

In the LCO section of the bases for PTS 3.9.5 on Page B 3.9.5-2, replace the greater than symbol with the greater than or equal to symbol for consistency with the condition for the minimum scram accumulator pressure in other parts of the PTS. This GTS bases deviation must be addressed in a standard departure, such as STD DEP 16.3-15.

Request for Additional Information No. 3071 Revision 0

South Texas Project Units 3 and 4  
South Texas Project Nuclear Operating Co  
Docket No. 52-012 and 52-013  
SRP Section: 16 - Technical Specifications  
Application Section: 2.0

QUESTIONS for Technical Specification Branch (CTSB)

16-\*\*\*

Correct the following editorials contained in Section 2.0 of the Technical Specifications:

1. On page B2.1.1-3, the first and second paragraphs need to be separated by a line in accordance with the Technical Specifications Writer's Guide.
2. On page B2.1.2-2, there is no period at the end of Reference 2.

Request for Additional Information No. 3072 Revision 0

South Texas Project Units 3 and 4  
South Texas Project Nuclear Operating Co  
Docket No. 52-012 and 52-013  
SRP Section: 16 - Technical Specifications  
Application Section: 3.4

QUESTIONS for Technical Specification Branch (CTSB)

16-\*\*\*

Correct the following editorials contained in Section 3.4 of the Technical Specifications (Note that #10 below also regards Section 3.9):

1. In bases 3.4.1, the last line of the LCO section lists Reference 1. This should list Reference 3.
2. Revise the Completion Time for Required Action A.1 of PTS 3.4.2 from "14 day" to "14 days" on page 3.4.2-1.
3. Replace the description of Required Action B.1 of PTS 3.4.3, on page 3.4.3-1, to "Reduce LEAKAGE increase to within limits." Condition B is that the unidentified LEAKAGE increase is not within limit. The Required Action to reduce the LEAKAGE to within limits does not necessarily address this Condition, since the unidentified LEAKAGE can still be within its limit of 19 L/min when the LEAKAGE increase is greater than its limit of 8 L/min. The bases for Actions B.1 and B.2 defines the Action as reducing the LEAKAGE increase to within limits, and this change is needed to make the Required Action consistent with the bases for the Required Action.
4. Revise the second paragraph of bases 3.4.4, Applicable Safety Analyses to have "RCS PIV leakage satisfies Criterion 2 of the NRC Policy Statement." as its' own paragraph for consistency with the format used in other sections of the bases.
5. Replace "LCO Note" with "LCO Note 1" in the second line of the first paragraph of the bases for Required Actions B.1, B.2 and B.3 of PTS 3.4.7, on page B 3.4.7-4.
6. Replace "LCO Note" with "LCO Note 1" in the second line of the first paragraph of the bases for Required Actions B.1 and B.2 of PTS 3.4.7, on page B 3.4.8-3.
7. Align the page header "3.4 REACTOR COOLANT SYSTEM (RCS)" with the left margin of page 3.4.9-1 of PTS 3.4.9.
8. Replace "3.4.9" with "3.4.8" in the discussion of STD DEP 16.3-9, LCO 3.4.7, Alternate Decay Heat Removal, on page 2.2-53 of Section 2.2.3 of Part 7 of the COL application.
9. At the top of page 3.4.9-1, correct the alignment of "3.4 Reactor Coolant System (RCS)" in Section 3.4.9.

10. The applicant is requested to revise the Applicable Safety Analyses section of the bases for PTS 3.4.7, 3.4.8, 3.9.7, and 3.9.8 to include the appropriate 10 CFR 50.36 criteria for LCO inclusion in technical specifications. In the Applicable Safety Analyses of the PTS bases sections listed above, each section has the following similar statement: although the system does not meet a specific criterion of the NRC Policy Statement, it was identified in the NRC Policy Statement as an important contributor to risk reduction. Criterion 4 of 10 CFR 50.36( c)(2)(ii) states that an SSC which operating experience or PRA has shown to be significant to public health and safety must be included in the technical specifications. Additionally, in the STS the corresponding bases sections appropriately include the reference to Criterion 4. Revise the bases sections listed above to appropriately reflect the applicable technical specification criteria.



Request for Additional Information No. 3073 Revision 0

South Texas Project Units 3 and 4  
South Texas Project Nuclear Operating Co  
Docket No. 52-012 and 52-013  
SRP Section: 16 - Technical Specifications  
Application Section: 3.10

QUESTIONS for Technical Specification Branch (CTSB)

16-\*\*\*

Correct the following editorial contained in Section 3.10 of the Technical Specifications:

1. On page 3.10.1-1, line a. under LCO 3.10.1 has a closed bracket ( ] ) at the end of the line with no corresponding open bracket anywhere preceding in the line.

Request for Additional Information No. 3075 Revision 0

South Texas Project Units 3 and 4  
South Texas Project Nuclear Operating Co  
Docket No. 52-012 and 52-013  
SRP Section: 16 - Technical Specifications  
Application Section: 3.3

QUESTIONS for Technical Specification Branch (CTSB)

16-\*\*\*

Correct the following editorials contained in Section 3.3 of the Technical Specifications:

Section 3.3.2.1

1. Correct Spelling of CORE ALERATIONS in SR 3.3.2.1.2 frequency

Section 3.3.1.1

1. Per the requirements of TSTF-GG-05-01 Writers Guide, for Plant-Specific Improved Technical specifications, Section 2.1.4 b, revise A.2.2.2 and SR 3.3.1.1.8 "----- NOTE-----" to read "-----NOTES-----"
2. The words "non-regenerative" in function 31 title should be capitalized as per TSTF-GG-05-01 Section 2.5.8 b.
3. Insert the sign  $\leq$  before the brackets in the column ALLOWABLE VALUE of function 2c
4. Replace the sign  $\leq$  with the sign  $\geq$  in the ALLOWABLE VALUE column of function 4, 12, 19 and 26
5. Replace  $\geq$  with  $\leq$  in the ALLOWABLE VALUE for function 20 and 25
6. Replace  $\leq$  with  $\geq$  and  $< =$  with  $\leq$  in the expressions  $\leq$  XX Liters/min and for  $< =$  XX Seconds, respectively for the ALLOWABLE VALUE of function 29.

Section 3.3.1.2

1. Place a page break between the ACTIONS section and the SURVEILLANCE REQUIREMENTS section and place the SURVEILLANCE REQUIREMENTS on a new page.

Section 3.3.1.3

1. For Condition E, of the PTS there is a period missing at the end of the third OR statement. In addition, remove the period at the end of Function 1, 2, and 3 of Table 3.3.1.3-1.

#### Section 3.3.1.4

1. For CONDITION I, insert "One or more SENSOR CHANNELS inoperable" and the first logical connector " OR" as both have been omitted.
2. Start the "SURVEILLANCE REQUIREMENTS" Table on a new page
3. Replace the sign  $\geq$  with the sign  $\leq$  before the bracket in the column ALLOWABLE VALUE of function 1.a., 2.a., 2.b., 3.a., and 12.d.
4. Replace the sign  $\leq$  with the sign  $\geq$  before the brackets in the column ALLOWABLE VALUE of function 1.b. and 3.b.

#### Section 3.3.7.1

1. Insert a blank line between the SURVEILLANCE REQUIREMENTS heading and the Note immediately below to facilitate readability and to duplicate the editorial convention utilized in GTS.

#### Section 3.3.8.1

1. Insert a blank line between the SURVEILLANCE REQUIREMENTS heading on page 3.3.8.1-1 and the ACTIONS heading on page 3.3.8.1-2 and the heavy black line framing these subsection tables to facilitate readability, consistency within this PTS section, and to duplicate the editorial convention utilized in GTS

16-\*\*\*

Correct the following editorials contained in Section 3.3 of the Technical Specifications:

Editorial comments for PTS 3.3.1.1 bases.

1. Edit the bases for following functions of PTS 3.3.1.1, as applicable, so that discussions of the following topics are in separate paragraphs, for consistency in bases presentation of other functions:

- \* number of channels required to be operable

- \* Allowable Values

- \* Applicability

Function 14, fourth paragraph

Functions 16a and 16b, second and fourth paragraphs

Functions 17 and 18, second and third paragraphs

Functions 21 and 22, fourth paragraph

2. On PTS 3.3.1.1 bases page B 3.3.1.1-39, third paragraph, the phrase "isolation, and feedwater line break mitigation initiation" should be written in title case as illustrated: "ESF, Isolation, and Feedwater Line Break Mitigation Initiation (Functions 11.b, 11.c, and 11.d) are required in MODES 1, 2, and 3..."

3. On PTS 3.3.1.1 bases page B 3.3.1.1-41, the Function 15 title is incomplete. Add the following missing text "- High" to title.
4. On PTS 3.3.1.1 bases page B 3.3.1.1-41, second sentence of bases for Function 15, should capitalize the function title: "This function, concurrent with the Drywell Pressure - High function (Function 11.d) provides a condensate pump trip signal to reduce the amount of energy added to the drywell.
5. On PTS 3.3.1.1 bases page B 3.3.1.1-44, for Function 18,  
\* Eliminate the break in the second paragraph, line 6.  
\* In the third paragraph, second sentence, replace "in MODE 1 and in MODES 2 and 3" with "in MODES 1, 2 and 3".

#### Editorial comments for section B 3.3.1.1

1. On PTS bases page B 3.3.1.1-17, in the second paragraph of PTS 3.3.1.1 bases section entitled "Applicable Saety Analysis, LCO, and Applicability," replace the word "Polity" with the correct word "Policy".
2. On PTS bases page B 3.3.1.1-18, line 4, in the sixth paragraph of PTS 3.3.1.1 bases section entitled "Applicable Saety Analysis, LCO, and Applicability," replace the word "normal" with the correct word "nominal" to be consistent with the GTS bases.
3. On PTS bases page B 3.3.1.1-20, line 4, in the first paragraph of the bases for Functions 1.a and 1.b, in the PTS 3.3.1.1 bases section entitled "Applicable Saety Analysis, LCO, and Applicability," re-align the last two words of the sentence ending in "rod withdrawal," which are misplaced.
4. On PTS bases page B 3.3.1.1-26, second sentence of second paragraph of the bases for Function 2.f, in the PTS 3.3.1.1 bases section entitled "Applicable Saety Analysis, LCO, and Applicability," replace the word "provided" by the correct word "provide".
5. On PTS bases page B 3.3.1.1-28, first sentence of third paragraph of the bases for Function 2.g, in the PTS 3.3.1.1 bases section entitled "Applicable Saety Analysis, LCO, and Applicability," replace the word "is" by the correct word "are".
6. On PTS bases page B 3.3.1.1-28, seventh line of first paragraph of the bases for Functions 3.a, 3.b and 3.c in the PTS 3.3.1.1 bases section entitled "Applicable Saety Analysis, LCO, and Applicability," replace the word "results" by the correct word "result".
7. On first line of PTS bases page B 3.3.1.1-30, underline "4. Reactor Steam Dome Pressure - Low (Injection Permissive)".
8. Apply widow/orphan protection to last paragraph on PTS bases page B 3.3.1.1-30 to avoid the orphan text "reduction in risk."
9. On PTS bases page B 3.3.1.1-36, last line of fifth paragraph of the bases for Functions 9.a, 9.b and 9.c in the PTS 3.3.1.1 bases section entitled "Applicable Saety Analysis, LCO, and Applicability," replace "ADS 0" with "ADS B".

10. Edit the bases for following functions of PTS 3.3.1.1, as applicable, so that discussions of the following topics are in separate paragraphs, for consistency in bases presentation of other functions:

- \* number of channels required to be operable
- \* Allowable Values
- \* Applicability

Function 10, fifth paragraph

11. On PTS bases page B 3.3.1.1-38, last item in list of protective actions in the bases for Functions 11.a, 11b, 11.c, and 11.c in the PTS 3.3.1.1 bases section entitled "Applicable Saety Analysis, LCO, and Applicability," capitalize "Feedwater Line Differential Pressure - High."

#### Editorial Comments for section B 3.3.1.1

1. Edit the bases for following functions of PTS 3.3.1.1, as applicable, so that discussions of the following topics are in separate paragraphs, for consistency in bases presentation of other functions:

- \* number of channels required to be operable
- \* Allowable Values
- \* Applicability

Function 23, second and third paragraphs

Function 25, 26, & 27, fourth paragraph

Function 28, fourth and fifth paragraphs

Function 29, fifth paragraph

Functions 30, 31, & 32, second and third paragraphs

Function 33, first and second paragraphs

2. In the bases for PTS 3.3.1.1, Function 27, change "These Functions are not" to "This Function is not".

3. In the bases for PTS 3.3.1.1, format References consistently. References are formatted in three different ways in this section e.g. "of Reference(s)", "in Reference" and "(Ref.)" See PTS bases pages B 3.3.1.1-17, 21, 23, 26, 28, 30, 35, 36, 37, 40, 41, 42, 44, 45, and 48.

4. "Applicability Bases" is referred to in many different ways in this section. For example, variances noted included "for the applicability basis", "for Applicability Bases", "for the Applicability basis", "for applicability basis", "for the Applicability Bases", "The applicability basis", "the Applicability", etc. Revise the bases to be consistent when referring to the applicability bases.

#### Editorial comments for PTS 3.3.1.1 bases

Note: Every edit to GTS bases text requires an associated STD DEP in COLA Part 7.

1. Revise the second paragraph of the bases for Required Action N.1, to state: "Declaring the supported features inoperable will cause entry into the applicable Conditions and Required Actions associated with the LCOs for the supported features, and will result in suitable compensatory measures being taken."

2. In the bases for PTS SR 3.3.1.1.3, delete the blank line after the fourth line of the third paragraph.
3. In the bases for PTS SR 3.3.1.1.13 and SR 3.3.1.1.14, in the second paragraph, replace the hyphen in "infrequent-provide" with the conjunction " and " .
4. In the bases for PTS 3.3.1.1, in the Reference section, remove the unnecessary page break after Reference 8. In addition, Reference 8, should state "Overpressure Protection".
5. For consistency with Function listings in GTS Table 3.3.1.1-1 and PTS Table 3.3.1.1-1, and for internal consistency, PTS 3.3.1.1 bases Table B 3.3.1.1-1, Functions 3, 6, 7, 8, 9, 11, 16, and 24 should be presented similar to functions 1 and 2 e.g. function 3 with 3a, 3b, 3c; in addition, all Function titles should be presented in the table.
6. In PTS 3.3.1.1 bases Table B 3.3.1.1-1, correct the error in the title for Function 5 as the title is incomplete and missing the word "Vessel".
7. In PTS 3.3.1.1 bases Table B 3.3.1.1-1, correct the title for Function 8 as the title is incomplete and missing the word "Low".
8. In PTS 3.3.1.1 bases Table B 3.3.1.1-1, correct the error in title for Function 9. Instead of "9. Reactor Vessel Water Level, Low-Level 1", the title should read "9. Reactor Vessel Water Level - Low, Level 1".
9. In PTS 3.3.1.1 bases Table B 3.3.1.1-1, capitalize the word "non-regenerative" in the title for Function 31.

#### Additional editorial comments on PTS 3.3.1.1 bases

1. On PTS bases page B 3.3.1.1-42, revise the second paragraph of the bases for Function 15, to be consistent with the Function title, e.g. "measured drywell pressure" should be "feedwater line differential pressure."
2. On PTS bases page B 3.3.1.1-42, make the last sentence of the second paragraph of the bases for Function 15 a new paragraph for clarity and consistency with the bases for the Allowable Values of other functions.

#### Editorial Comments for section B 3.3.1.1

1. In the PTS bases, avoid blank lines at the end of a page, except as needed for widow/orphan prevention when the text continues to the next page.
2. On PTS 3.3.1.1 bases pages B 3.3.1.1-1 and 2, the information contained in the DTF section breaks in the middle of the sentence and continues on the next page. Break the sentence at the end rather than in the middle.
3. On PTS 3.3.1.1 bases page B 3.3.1.1-3, second to last paragraph, remove the word "other" from the last sentence of the paragraph where it is currently shown before the word divisions.

4. On PTS 3.3.1.1 bases page B 3.3.1.1-3, create a new paragraph after the first row and combine the second and third sentences in the new paragraph as shown below:  
There are two basic segments that are used to initiate protective actions.  
The SENSOR CHANNEL segment consists of the instrumentation portion which encompasses the sensors, sensor data conversion, sensor data transmission path and the setpoint comparison. Capability is provided to manually trip individual SENSOR CHANNELS. Interlocks are provided to prevent placing more than one SENSOR CHANNEL for a given Function in trip at the same time.  
The LOGIC CHANNEL segment consists of the functions responsible for implementing the initiation logic, generating initiation signals when needed, and various support functions. The LOGIC CHANNELS in each division send data to the OUTPUT CHANNELS.
5. On PTS 3.3.1.1 bases page B 3.3.1.1-4, third paragraph, last sentence, replace the word "effect" with "affect".
6. On PTS 3.3.1.1 bases page B 3.3.1.1-8, the title, Low Pressure Flooder (LPFL) System (Mode of the Residual Heat Removal System) should be underlined.
7. On PTS 3.3.1.1 bases page B 3.3.1.1-10, last paragraph, replace the word "then" with "than".
8. On PTS 3.3.1.1 bases page B 3.3.1.1-14, underline "3. Reactor Core Isolation Cooling (RCIC) System Isolation".
9. On PTS 3.3.1.1 bases page B 3.3.1.1-16, underline "ATWS MITIGATION".

#### Editorial Comments for section B 3.3.1.2

1. On bases page B 3.3.1.2-8, second line, in the bases for PTS 3.3.1.2 Actions D.1 and D.2, correct the typographical error, "repairs on at least on of the" should be "repairs on at least one of the".
2. On bases pages B 3.3.1.2-14 and -15, last sentence of bases for PTS SR 3.3.1.2.6 and SR 3.3.1.2.7, correct the typographical error, "but not channel failure, are infrequent provide confidence that" should be "but not channel failure, are infrequent and provide confidence that".

#### Editorial Comments for section B 3.3.1.3

1. On PTS bases page B 3.3.1.3-1, in the bases section title, place a comma after "LCO".

#### Editorial comments for section B 3.3.4.1

1. On PTS bases page B 3.3.4.1-13 in the last paragraph of the bases for PTS 3.3.4.1 Actions C.1.1, C.1.2.1, and C.1.2.2 and C.2, , replace C.2.1 with C.1.1, C.2.2.1 with C.1.2.1, and C.2.2.2 with C.1.2.2.

2. On PTS bases page B 3.3.4.1-14 in the first paragraph of the bases for PTS 3.3.4.1 Actions F.1 and F.2, replace "...appropriate actions are taken for if the required Actions..." with "...appropriate actions are taken if the required Actions..."

3. On PTS bases page B 3.3.4.1-14 in the bases for PTS 3.3.4.1 Action G.1, correct the second sentence to read, "Because of the low probability of an event requiring these Functions, [24] hours is provided to restore the inoperable functions."

#### Editorial comments for section B 3.3.6.1

1. On PTS bases page B 3.3.6.1-5, in the bases for PTS 3.3.6.1 Functions 9 and 10, replace "10-6%" with either "1E-6%" or with the "-6" written as a superscript immediately following "10".

2. Add "Revision 4" to Reference 1 of the bases reference section on page B 3.3.6.1-10 in the bases for PTS 3.3.6.1. Reference 1 is Regulatory Guide 1.97, "Instrumentation for Light-Water Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," June 2006.

#### Editorial Comments for Section B 3.3.5.1

1. On PTS bases page B 3.3.5.1-2, last paragraph of the bases Background section, second sentence, remove the extra word "establish." This correction will require a departure from the GTS bases.

2. On PTS bases page B 3.3.5.1-2, first paragraph, fourth sentence, of the bases section entitled "Applicable Safety Analysis, LCO, and Applicability," for Function 1.a, replace "These analysis" with "This analysis."

3. On PTS bases page B 3.3.5.1-3, last paragraph, 1st sentence. The acronym "RWE" has already been previously defined, revise the sentence accordingly. Define the acronym "RTP".

4. Correct the typographical errors in the following sentences is SR 3.3.5.1.1 and SR 3.3.5.1.2

The sentence, "The setpoint shall be left set consistent with the assumptions".. should be revised to read, "The setpoint shall be set consistent with the assumptions.."

5. On PTS bases page B 3.3.5.1-6, last sentence of second paragraph of the bases for PTS SR 3.3.5.1.1 and SR 3.3.5.1.2, replace "provides" with "provide".

6. On PTS bases page B 3.3.5.1-7, first sentence second paragraph of the bases for PTS SR 3.3.5.1.5, remove the extra phrase "one hour after".

7. On PTS bases page B 3.3.5.1-8, first sentence of the bases for PTS SR 3.3.5.1.7, replace "required" with "require".

#### Editorial Comments for Section B 3.3.8.2-1

1. The upper right page heading for GTS & PTS 3.3.8.2 is "RPV Coolant Temperature Monitoring". The subsection title for GTS & PTS 3.3.8.2 is "Reactor Coolant



Temperature Monitoring - Shutdown". The upper right page heading and the subsection title for the bases of GTS & PTS 3.3.8.2 are "Reactor Coolant Temperature Monitoring." Make these headings and titles consistent, and associated needed deviations from the GTS and bases with a standard departure.

16-\*\*\*

Editorial comment for bases of PTS 3.3.1.3, related to FSAR Figures 15E-1 and 15E-1b and STD DEP 16.3-83.

If possible, provide better illustrations of FSAR Figures 15E-1a and 15E-1b such that the logic flow path for the Manual ATWS-ARI/SLCS Initiation logic can be validated as described in STD DEP 16.3-83.

STD DEP 16.3-83 provides the justification for the departure regarding the bases discussion of the Manual ATWS-ARI/SLCS Initiation logic which has been changed to describe the actual plant design. This Manual ATWS-ARI/SLCS discussion is illustrated in FSAR Figures 15E-1a and 15E-1b but the figures are not easily readable such that the logic path and departure can be validated.

Request for Additional Information No. 3076 Revision 0

South Texas Project Units 3 and 4  
South Texas Project Nuclear Operating Co  
Docket No. 52-012 and 52-013  
SRP Section: 16 - Technical Specifications  
Application Section: 3.8

QUESTIONS for Technical Specification Branch (CTSB)

16-\*\*\*

Correct the following editorials contained in Section 3.8 of the Technical Specifications:

Section 3.8.1

1. The applicant is requested to add GTS 3.8.1 ACTION D to PTS 3.8.1 ACTIONS. GTS 3.8.1 ACTION D, for the condition of two required offsite circuits inoperable, appears to have been inadvertently omitted from PTS 3.8.1 ACTIONS, since it is included in the bases ACTIONS section for PTS 3.8.1.

Section 3.8.2

1. PTS 3.8.2 Required Action A.1 should be Required Action A.1.1 to match the GTS 3.8.2 Required Action A.1.1.

2. The conjunction "or" should be removed, and the subsequent phrase should phrase begin on its own line, in alignment with the first line of the applicability of PTS 3.8.2, in order to conform to the STS writer's guide for applicability statements. This correction will require a STD DEP in COLA Part 7.

Section 3.8.9

1. Place line separators between the BACKGROUND and APPLICABLE SAFETY ANALYSES bases sections and between the APPLICABLE SAFETY ANALYSES and LCO bases sections for PTS 3.8.9.

2. Revise the PTS 3.8.9 bases LCO section on page B 3.8.9-3 to be consistent with the language in the corresponding GTS 3.8.9 bases LCO section; specifically, the following sentence does not make sense: "Maintaining the three Divisions of AC and the four Divisions of DC and AC vital bus electrical power distribution subsystems OPERABLE ensures that the redundancy incorporated in the design of the ESF systems Bypass System inoperable, modifications to the MCPR limits (LCO 3.2.2), is not defeated." It should read consistent with the GTS 3.8.9 bases page B.3.8.9, LCO Section, second paragraph, first line, which states, "Maintaining the three Divisions of AC and the four Divisions of DC and AC vital bus electrical power distribution subsystems OPERABLE ensures that the redundancy incorporated in the design of the ESF systems is not defeated."

3. On PTS 3.8.9 bases page B 3.8.9-3, in the LCO section, between the first and second paragraph on the page, there is an extra line break that should be removed.