

**Response to RAI Received on October 29, 2009**

## REVIEW COMMENTS

## APPENDIX B, "MARKED-UP TECHNICAL SPECIFICATIONS AND BASES

NUREG-1431, "Standard Technical Specifications, Westinghouse Plants" TS 3.6.6A, Containment Spray and Cooling Systems (Atmospheric and Dual); TS 3.6.6C, Containment Spray System (Ice Condenser); TS 3.6.6E, Recirculation Spray (RS) System (Subatmospheric); and TS 3.6.7, Spray Additive System (Atmospheric, Subatmospheric, Ice Condenser, and Dual) have Completion Times for Condition B.1, B.1, F.1 and B.1 (respectfully) requiring the unit to be placed in MODE 3 in 6 hours and have MODE 5 endstates for Condition B.2, B.2, F.2 and B.2 (respectfully) requiring the unit to be placed in MODE 5 in 84 hours. The MODE 5 completion time is described as an "extended completion" time because in accordance with LCO 3.0.3 when an LCO is not met and the associated ACTIONS direct placing the unit in MODE in which the LCO is not applicable TS [LCO 3.0.3 Action requirements] requirements specify 6 hours to reach MODE 3, 12 hours to reach MODE 4 and 36 hours to reach MODE 5.

Bases for the extended Completion Time (i.e., be in MODE 5) for each of the Containment Spray specifications is stated as: "The extended interval to reach MODE 5 allows additional time for attempting restoration of the containment spray train and is reasonable when considering the driving force for a release of radioactive material from the Reactor Coolant System is reduced in MODE 3."

Bases for the extended Completion Time (i.e., be in MODE 5) for the Spray Additive System (TS 3.6.7) is stated as: "The extended interval to reach MODE 5 allows 48 hours for restoration of the Spray Additive System in MODE 3 and 36 hours to reach MODE 5. This is reasonable when considering the reduced pressure and temperature conditions in MODE 3 for the release of radioactive material from the Reactor Coolant System.

WCAP-16294 proposes to modify the MODE 5 endstate for the above TSs to be MODE 4 with a 60 hour Completion Time. WCAP-16294 did not provide analysis which justifies applying an extended Completion Time to the proposed MODE 4 modified endstate. Therefore, WCAP-16294, Appendix B should be revised be consistent with LCO 3.0.3 requirements by revising TS 3.6.6A, TS 3.6.6C, TS 3.6.6E, and TS 3.6.7 MODE 4 endstate Completion Times from 60 hours to 12 hours and make conforming changes to the Bases for these TS.

**Response:**

As discussed above, the Bases for TS 3.6.7, state: "The extended interval to reach MODE 5 allows 48 hours for restoration of the Spray Additive System in MODE 3 and 36 hours to reach MODE 5. This is reasonable when considering the reduced pressure and temperature conditions in MODE 3 for the release of radioactive material from the Reactor Coolant System." Therefore 48 hours is allowed to restore the Spray Additive System to Operable status in Mode 3, and is based on the

reduced pressure and temperature in Mode 3. Since the endstate of Required Action B.2 is being revised from Mode 5 to Mode 4, adding the time allowed to reach Mode 4 (6 hours) results in a total time allowed to reach Mode 4 of 54 hours. The Completion Time for Required Action B.2 was revised from 60 hours to 54 hours, and the Bases were also revised to reflect this change.

The same change was also made to the Completion Time for Required Action B.2 contained in TS 3.6.6A and 3.6.6C, and to Required Action F.2 contained in TS 3.6.6E. The Bases for these TS were also revised to be consistent with the changes made to the Bases for TS 3.6.7.

Attachment 1 contains revisions to these TS and Bases to reflect the changes discussed above.

Attachment 2 contains markups of WCAP-16294 pages 6-70, 6-74, 6-77, 6-79, and 6-80 that reflect the revision to the Completion Time for the Required Action to reach Mode 4 from 60 hours to 54 hours.