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see Proposed Change To Tech Specs

SUBJECT: Provides response to RAI & transmits TS change request to convert to Improved Std TS.

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10 CFR 50.90

CP&L

Carolina Power & Light Company
Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

RNP File No: 13510HA
Serial: RNP-RA/97-0066

MAR 27 1997

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION
AND TRANSMITTAL OF SUPPLEMENT 1 REGARDING
THE TECHNICAL SPECIFICATIONS CHANGE REQUEST TO CONVERT TO THE
IMPROVED STANDARD TECHNICAL SPECIFICATIONS

Gentlemen:

By letter dated August 27, 1996, Carolina Power & Light (CP&L) Company submitted a request for a change to the H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Technical Specifications (TS) to convert the HBRSEP, Unit No. 2 TS to be consistent with NUREG-1431, "Standard Technical Specifications-Westinghouse Plants," Revision 1. By letter dated February 24, 1997, the NRC issued a request for additional information regarding the CP&L ITS submittal that pertained to ITS Sections 3.4, "Reactor Coolant System," 3.6, "Containment Systems," and 3.7, "Plant Systems." In order to support the NRC review schedule for this submittal, the NRC has requested that the response to their request be submitted within 30 days of receipt of their letter (i.e., March 28, 1997). In a meeting with the NRC conducted on March 21, 1997, the NRC agreed to a submittal of responses to questions relating to ITS Section 3.6 by April 4, 1997.

Attachment 1 provides an affidavit as required by 10 CFR 50.30(b).

The response to the NRC's request for additional information is provided as Attachments 2 and 3 to this letter. The responses are provided in table format similar to the question format provided in the NRC letter dated February 24, 1997.

A001
1/1

Supplement 1 to the ITS Conversion Submittal dated August 27, 1997, with errata submitted by letters dated December 18, 1996, and January 17, 1997, is provided as Attachment 4, with instructions for inserting the supplement into the submittal. Supplement 1 contains augmented discussions of more restrictive changes for ITS sections except Section 3.6, which include bases for why the changes are acceptable. Augmented discussions of more restrictive changes relating to ITS Section 3.6 have been excluded from Supplement 1 and will be included in the supplement associated with the responses to the NRC request for additional information regarding ITS Section 3.6.

Supplement 1 contains submittal pages which have been revised in response to the NRC's request for additional information. Supplement 1 incorporates generic changes to NUREG-1431, "Standard Technical Specifications - Westinghouse Plants," Revision 1 (i.e., ISTS), that have not previously been referenced in the submittal but have been submitted to the NRC for review prior to the ITS submittal date of August 27, 1996, and have subsequently been approved. These generic changes are Technical Specifications Task Force (TSTF) numbers 6, 8, 26, 61, 95, and 109. Supplement 1 also removes TSTF-27, which has been rejected by the NRC.

Supplement 1 reflects issuance of amendments to the Current Technical Specifications (CTS) since July 31, 1996. These include Amendment 171, issued by letter dated August 1, 1996, Amendment 172, issued by letter dated August 6, 1996, Amendment 173, issued by letter dated August 9, 1996, Amendment 174, issued by letter dated September 11, 1996, and Amendment 175, issued by letter dated September 12, 1996.

Supplement 1 corrects a discussion of change (DOC) for ITS Section 3.3 "M29" to an administrative change (i.e, DOC A29) and revises the CTS markup and ISTS markup for Section 3.3.3 accordingly, and corrects the trip setpoint for power range neutron flux in the markup of ISTS page 3.3-15.

By letter dated March 6, 1997, the NRC requested additional information regarding the Low Temperature Overpressure Protection (LTOP) System event analyses. In order to support the NRC review schedule for this submittal, the NRC has requested that the response to their request be submitted within 30 days of receipt of their letter (i.e., April 11, 1997). During a March 5, 1997, telephone conversation between the NRC, CP&L and Siemens Power Corporation, it was determined that additional conservatism may be available in the LTOP System event analysis currently being reviewed by the NRC. The LTOP analysis is currently being reperformed to ascertain if sufficient margin is available to operate three (3) Reactor Coolant Pumps (RCPs) and three (3) charging pumps in MODE 4 with a single operable Safety Injection (SI) pump. If this analysis is successful at determining that sufficient additional margin exists, revisions to ITS Sections to remove unnecessary operational restrictions in MODE 4 are planned to be submitted with the CP&L responses to the NRC letter dated March 6, 1997. However, in the absence of a completed LTOP reanalysis, the CP&L responses to the current NRC request for additional information regarding ITS Section 3.4

presume that the current LTOP analysis is as submitted in Enclosure 5 to CP&L letter dated August 17, 1996, and in CP&L letter dated February 16, 1997.

In accordance with 10 CFR 50.91(b), CP&L is providing the State of South Carolina with a copy of this letter with the enclosures and attachment.

If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff at (803) 857-1437.

Very truly yours,

Terry M. Wilkerson

T. M. Wilkerson
Manager - Regulatory Affairs

ALG/alg
Attachments:

1. Affidavit
2. Response To Request For Additional Information Regarding The Technical Specifications Change Request To Convert To The Improved Standard Technical Specifications, Section 3.4, "Reactor Coolant System"
3. Response To Request For Additional Information Regarding The Technical Specifications Change Request To Convert To The Improved Standard Technical Specifications, Section 3.7, "Plant Systems"
4. Supplement 1

c: Mr. M. K. Batavia, Chief, Bureau of Radiological Health (SC)
Mr. L. A. Reyes, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP (4 copies)
Mr. B. B. Desai, USNRC Resident Inspector, HBRSEP
Attorney General (SC) (w/out Enclosures)
Lockheed Idaho Technology, Inc.

Affidavit

State of South Carolina
County of Darlington

C. S. Hinnant, having been first duly sworn, did depose and say that the information contained in letter RNP-RA/97-0066 is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

C S Hinnant

Sworn to and subscribed before me

this 27th day of March 1997

(Seal) Albert L Carson
Notary Public for South Carolina

My commission expires: March 22nd, 2005

50-261 CP&L ROBINSON 2

RESPONSE TO RAI AND TRANS SUPPL 1 RE
THE T.S. CHANGE REQUEST TO CONVERT
TO THE IMPROVED TECH SPECS

REC'D W/LTR DTD 03/27/97....9704030072

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING THE TECHNICAL SPECIFICATIONS CHANGE REQUEST TO CONVERT TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS

SECTION 3.4, "REACTOR COOLANT SYSTEM"

HBRSEP, Unit No. 2 ITS 3.4.1

RCS PRESSURE, TEMPERATURE, AND FLOW DEPARTURE FROM NUCLEATE BOILING (DNB) LIMITS

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
No Comment					

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.2-1	JD 2	STS 3.4.2	STS 3.4.2 Required Action A.1 requires the plant to be in MODE 3. ITS 3.4.2 Required Action A.1 changes the requirement from MODE 3 TO "MODE 2 with K_{eff} < 1.0. " There is inadequate justification for this deviation from the STS.		Technical Specification Task Force (TSTF) Generic Change TSTF-26 has been approved by the NRC. This change to NUREG-1431, Revision 1, has been incorporated by reference into Supplement 1 of the CP&L Submittal dated August 27, 1996.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.3-1	LA1, R1	CTS 3.1.2.1, 3.1.2.2, 3.1.2.3, 3.1.2.4	CTS 3.1.2.1.a, 3.1.2.1. b, 3.1.2.1.c, and 3.1.2.2, 3.1.2.3, and 3.1.2.4 requirements are moved to "licensee controlled documents. " The specific licensee controlled documents are not identified.	Identify the specific licensee controlled documents.	The relocated requirements in CTS Sections 3.1.2.1.a, 3.1.2.1.b, 3.1.2.1.c, and 3.1.2.2, 3.1.2.3, and 3.1.2.4 will be relocated to the Technical Requirements Manual. At ITS implementation, the Technical Requirements Manual will be incorporated by reference into the UFSAR.
3.4.3-2	A1	CTS 3.1.2.1	CTS 3.1.2.1 imposes specific limits on reactor coolant pressure, and on Reactor Coolant System (RCS) heat up and cool down rates. ITS 3.4.3 imposes specific limits on RCS pressure, RCS temperature, and RCS heat up and cool down rates. The addition of "RCS temperature" to the requirement represents a More Restrictive change that is not discussed or justified..		Because Current Technical Specifications (CTS) Figures 3.1-1 and 3.1-2 are defined curves that are a function of both Reactor Coolant System (RCS) pressure and RCS temperature, the addition of "RCS temperature" in the LCO is not a more restrictive change to CTS Section 3.1.2.1. See new Discussion of Change (DOC) A29 that justifies this change as an administrative change.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.3-3	M4	CTS 3.1.2.1	If CTS 3.1.2.1 is not met, the operator must place the plant on a shut down track in accordance with CTS 3.0 requires the plant to be in Cold Shutdown (reactor subcritical and $T_{avg} \leq 200^{\circ}$ F) within 38 hours. If ITS 3.4.3, and its associated ACTION A is not met, Required Action B requires the operator to place the plant on a shut down track. From time of entry into Required Action B, the prescribed Completion Time to be in MODE 5 ($K_{eff} < 0.99$ and RCS Pressure < 420 psig) is 42 hours. This represents an extension to an Allowed Outage Time for which there is not justification	The justification for this and other More restrictive changes could use improvement.	The total "allowed outage time," assuming that ACTION A.1 is not met within the allowed Completion Time is 36 hours and is not 42 hours as discussed in ITS Section 1.3, "Completion Times." Therefore the description of this change as more restrictive is correct.. The DOCs for more restrictive changes in ITS Section 3.4 have been augmented to incorporate bases and other information which justifies the need for the more restrictive change.
3.4 .3-4	None	ITS 3.4-3, Action B	Does less that 420 psig in the Required Action present a problem given LCO 3.4.12 for has the relief valves set at less than or equal to 400 psig?		The correct value for Required Action B.2 is 400 psig, which is consistent with LCO 3.4.12 requirements. ISTS markup page 3.4-5, ISTS Bases page B 3.4-14, ITS page 3.4-5 and ITS Bases page B 3.4-15 have been corrected and included in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
No Comment					

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.5-1	L1	CTS 3.1.1.1. a. 3	CTS 3.1.1.1. a. 3 does not address that reactor coolant pumps can be deenergized. This is changed in ITS 3.4.5 to allow reactor coolant pumps to be de-energized for ≤ 1 hour in any 8 hour period There is inadequate justification for this change. While the L1 discussion states that this will only be done as part of a special test, in which case it would have to be reviewed pursuant to 50.59 before being implemented, there is nothing in the TS that restricts deenergizing reactor coolant pumps only to special tests. Therefore, justification needs to be provided that operation in Mode 3 with no RCS flow is consistent with the plant licensing basis..		CTS Specification 3.1.1.1.a allows operation with less than two Reactor Coolant Pumps (RCPs) in operation (i.e., either one RCP in operation or no RCPs in operation). This specification includes the conditions set forth in CTS 3.1.1.1.a.1, 3.1.1.1.a.2, and 3.1.1.1.a.3. The allowance for no RCPs in operation in hot shutdown was included in the original Technical Specifications, issued by the Atomic Energy Commission (AEC) by letter dated July 31, 1970, and has been retained in subsequent amendments. Because the CTS contains no time restrictions for less than two RCPs in operation during hot shutdown, this aspect of the change is more restrictive (i.e., adding a maximum time allowable for no RCPs in operation). Refer to revised DOC "L1" and information in support of a No Significant Hazards Conclusion (NSHC) "L1," which justify the natural circulation condition, and new DOC "M38" in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.5-2	None	ITS Bases 3.4.5 D.1, D.2, D.3	What does "Boron dilution requires forced circulation to provide proper mixing, and preserve the margin to criticality" mean? - Boron dilution requires ??	Also see Bases 3.4.6 C.1 and C. 2, and Bases 3.4.8 B.1 and B.2	Required Action D.2 requires that all operations involving reduction in RCS boron concentration be suspended immediately. A reduction in boron concentration is equivalent to boron dilution. Since boron dilution occurs in specific locations where the Chemical and Volume Control System (CVCS) discharges into the RCS (i.e., RCS Loops and Pressurizer spray), RCS flow is required to provide proper mixing to assure that boron concentration and reactivity are uniform throughout the reactor core. A clarification within the scope of JFD 1 has been incorporated into the Bases to Required Actions D.1, D.2, and D.3 to LCO 3.4.5 in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.5-3	L18	CTS 3.1.1.2	CTS 3.1.1.2 requires at least two steam generators to be operable whenever the average primary coolant temperature is above 350° F. CTS 3.0 requires the unit to be placed in hot shutdown within 8 hours until the reactor is placed in a condition in which the specification is not applicable. ITS 3.4.5 Required Action B. 1 requires that the unit be placed in MODE 4 within 12 hours. The discussion and justification do not address the More Restrictive requirement that the unit be placed in MODE 4 within 12 hours, versus ≤350°F within 38 hours.	Provide discussion and justification for this More Restrictive change.	In accordance with the CTS, the reactor is in hot shutdown with RCS temperature above 350°F, and also in hot shutdown with RCS temperature above 200°F. CTS Specification 3.0 requires that the reactor be placed in the cold shutdown condition in 30 hours. Since no specific required action exists in CTS for reaching RCS temperature ≤ 350°F, and the reactor is in a condition prohibited by TS under these circumstances, the addition of Required Action B.1 adds an additional restraint to reach MODE 4 of 4 hours within the required shutdown time of 30 hours as provided in CTS 3.0. It is appropriate to characterize the entire change as a less restrictive change because no specific required actions are contained in the CTS for this LCO. However, DOC L18 was revised in Supplement 1 to characterize this aspect of the change as more restrictive.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.5.-4	L19	CTS 3.1.1.1.a	CTS 3.1.1.1.a allows the number of operating reactor coolant pumps to be reduced provided certain actions are taken. These actions ensure that a power excursion resulting from a inadvertent control rod withdrawal event is precluded. CTS 3.1.1.1.a does not explicitly provide a time period for implementing these requirements in the event of a loss of an operating reactor coolant pump. ITS 3.4.5 Required Action C.1 requires that the conditions of the LCO be met within 1 hour, resulting in a More Restrictive change for which there is inadequate discussion and justification.	Provide additional discussion and justification for this More Restrictive change.	Refer to response to comment 3.4.5-1, and new DOC "M38," in Supplement 1.
3.4.5-5	JD6	STS 3.4.5 Condition C	STS 3.4.5 CONDITION D was modified to include "Require Action and Completion Time of Condition C not Met. " There is no discussion or justification for this change.	It is not just sufficient to add this Action. It must be explained what in the HBR design requires this extra action not in the STS	Required Action D.1 was added to avoid entry into LCO 3.0.3 in the event that other requirements of the LCO are not met within the Completion Time of Required Action C.1. The additional requirements of the LCO (i.e, those relating to rod control system, reactor trip breakers, lift disconnect switches and shutdown margin) relate to preclusion of an uncontrolled rod withdrawal accident. Required Actions D.1 and D.2 assure that positive reactivity is not added and negative reactivity is added immediately if these additional LCO requirements are not met within the Required Action C.1 Completion Time. Additional justification for the changes to ISTS Conditions C and D are provided in the new JFDs 32 and 33 in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.5-6	JD6	STS 3.4.5 Condition C	STS 3.4.5 CONDITION C is changed in the ITS to read "Requirements of the LCO not met for reasons other than Condition A or D." ITS 3.4.5 Condition D is not yet entered at this point in the ACTIONS. Therefore it is inappropriate to refer to the requirements of Condition D.		ITS Condition D has been revised to reference Required Action C.1 rather than Condition C, to avoid confusion. Additional justification for changes to ISTS Conditions C and D are provided in new JFDs 32 and 33 in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.5-7	M7	CTS 3.1.1.1.a	CTS 3.1.1.1.a does not include the provision that the Rod Control System be incapable of rod withdrawal. ITS 3.4.5.a includes such a provision as an option. While M—7 is fine as far as it goes, there is no justification for stating this a more restrictive change even with added option of the rod control provision that is not in CTS 3.1.11.a.		Refer to revised DOC M7 which provides additional justification for the more restrictive changes. The addition of ". . . rod control system is not capable of rod withdrawal. . ." to the CTS has been determined to be an administrative change, because the existing CTS conditions to open the lift disconnect switches for all control rods not fully withdrawn or open reactor trip breakers are specific methods of rendering the rod control system not capable of rod withdrawal. Refer to new DOC A4.
3.4.5-8	None	LCO 3.4.5	If Action C is not for rod control as it is in the ITS (covered in the NOTE), why is Action C necessary ?		Action C provides a Required Action for entry into the LCO Condition when the requirements to render the rod control system incapable of rod withdrawal are not met. Since several conditions are listed in the LCO and NOTE, each one of the conditions will satisfy the LCO if met, and the NUREG-1431 Action C does not cover all of the conditions in the same manner as the LCO, the restatement of Action C as proposed is the most appropriate manner to state Action C.
3.4.5-9	L-18		Typo - The Discussion references NUREG 1433.		Refer to revised DOC L18 in Supplement 1.
3.4.5-10	None	Bases 3.4.5.3 Action C.1	To be correct, shouldn't the line beginning "should a power excursion occur ... " have the word "yet" before the word "satisfied "? The only time such an excursion can occur is with a, b, c, and d not satisfied.		The bases for Action C.1 is correct as stated.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.6-1	L3	CTS 3.1.1.1.-c.2	The L-3 discussion focuses on submitting the report and that discussion is adequate. However, CTS 3.1.1.1.c.2 requires that, if a reactor coolant pump or RHR pump cannot be restored to operation within 1 hour ... ITS 3.4.6 Required Action and Completion Time to initiate action and restore one loop or train to OPERABLE status and operation is " immediately. " There is no discussion or justification for the More Restrictive requirement of immediately versus 1 hour	Provide discussion and justification for the More Restrictive change.	The additional justification for a Completion Time of Immediately has been incorporated into revised DOC M11 in Supplement 1.
3.4.6-2	L2	CTS 3.1.1.1.-c.1	CTS 3.1.1.1.c.1 includes an ACTION to establish RCS boron concentration equal to or greater than that needed to maintain a shutdown margin of 1% Δk/k at 200°F. No maximum time is specified to complete this ACTION. The equivalent ITS 3.4.6 Required Action C. 1 requires that all operations involving a reduction in RCS boron concentration be suspended immediately. The action is less restrictive however, the change in time constitutes a More Restrictive change for which there is no discussion or justification.	Provide discussion and justification for the More Restrictive change.	The additional justification for a Completion Time of Immediately has been incorporated into revised DOC M11 in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.6-3	JD9	STS 3.4.6 ACTION A	STS 3.4.6 Condition A states "One required RCS loop inoperable, " and "Two RHR loop inoperable. " The modified ITS 3.4.6 Condition A states "One required loop or train inoperable" and "One required RCS loop OPERABLE." The discussion and justification lacks any degree of detail for this change and is inadequate. The difference in the use of the terms operable and inoperable between the final ITS and the STS markup may explain the comment.		A typographical error has been corrected in the Proposed HBRSEP, Unit No. 2 ITS LCO 3.4.6 Action A, and the corrected page has been included in Supplement 1. Refer to revised JFD9 to ISTS Markup in Supplement 1.
3.4.6-4	JD9	STS 3.4.6 ACTION B	STS 3.4.6 Condition B states "One required RHR train inoperable, " and " Two required RCS loops inoperable. " The modified ITS 3.4.6 Condition B states " One required loop or train inoperable, " and "One required RHR train inoperable. " The discussion and justification lacks any degree of detail for this change and is inadequate.	Sane reasoning as comment above.	A typographical error has been corrected in the Proposed HBRSEP, Unit No. 2 ITS LCO 3.4.6 Action B, and the corrected page has been included in Supplement 1. Refer to revised JFD9 to ISTS Markup in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.7-1	L6	CTS 3.3.1.4	CTS 3.3.1.4 requires both residual heat removal (RHR) loops operable. ITS 3.4.7 requires both RHR trains be OPERABLE and on in operation, or one RHR train OPERABLE and in operation and one SG OPERABLE. There is inadequate discussion and justification for use of the SG for decay heat removal.	The BACKGROUND section of the Bases appear to provide the type of information needed.	Additional justification for the use of the Steam Generator for decay heat removal has been incorporated into revised DOC L6 in Supplement 1.
3.4.7-2	L17	CTS 3.3.1.4.a	CTS 3.3.1.4.a requires the existence of a method to add make-up water to the RCS be verified within 24 hours, and the inoperable RHR loop be restored to operable status within 14 days ITS 3.4.7 Required Action A.1 requires that action be initiated immediately to restore a second RHR train to operable status. The discussion and justification do not address the deletion of the make-up water requirement.		A change to the justification to address deletion of the CTS makeup water requirement has been incorporated into revised DOC L17 in Supplement 1.
3.4.7-3	L16	CTS 3.3.1.4.a	CTS 3.3.1.4.a requires the inoperable RHR be restored to operable status within 14 days. ITS 3.4.7 Required Action and Completion Time require initiating action to restore a second RHR Train to OPERABLE status " immediately. " There is no discussion or justification for changing from initiating action immediately versus restore in 14 days. The discussion only addresses submitting a special report.	Provide additional discussion and justification for the Less Restrictive change.	Additional justification for the Completion Time of Immediately has been incorporated into revised DOC M39 in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.7-4	L4	CTS 3.3.1.4.b	CTS 3.3.1.4.b requires that, if both RHR loops become inoperable, all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere be closed prior to the RCS average temperature exceeding 200°F. ITS 3.4.7 does not include this requirement. There is inadequate discussion and justification for this change from CTS requirements. 1) The requirement to close the penetrations is a provision to preclude the release of radioactive material in steam, the L-4 discussion only focuses on boron stratification which is a addresses the separate concern of the unplanned return to criticality and does make some general references to shutdown risk considerations but neither summarizes them nor explains why they must be complied with.	Provide additional discussion and justification for the changed CTS requirement.	Additional justification to address removal of the containment closure requirement has been incorporated into revised DOC L4 in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.7-5	M14	CTS 3.3.1.4.b	CTS 3.3.1.4.b requires that, if both RHR loops become inoperable, at least one loop be restored to OPERABLE status as soon as possible. ITS 3.4.7 Required Action B.1 requires that if both RHR trains become inoperable or "no RHR train is in operation" that all operations involving a reduction in RCS boron concentration be suspended, and that actions be initiated immediately to restore one RHR train to OPERABLE status and operation. The discussion and justification do not address the change of no RHR train in operation.	It appears the Bases may contain the needed information.	Additional justification to address the restoration of one RHR train to operable and in operation has been incorporated into revised DOC M14 in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.8-1	L17	CTS 3.3.1.4.a	CTS 3.3.1.4.a requires the existence of a method to add make-up water to the RCS be verified within 24 hours ITS 3.4.8 Required Action A.1 does not retain this requirement. The discussion and justification do not address deletion of the make-up water requirement	Same comment as made for section 3.4.7	A change to the justification to address deletion of the makeup water requirement has been incorporated into revised DOC L17 in Supplement 1.
3.4.8-2	L17	CTS 3.3.1.4.a	CTS 3.3.1.4.a Requires the inoperable RHR loop be restored to operable status within 14 days. ITS 3.4.8 Required Action A. 1 and Completion Time require initiating action to restore a RHR Train to OPERABLE status "immediately." There is no discussion or justification for initiating action immediately versus restore in 14 days. The discussion addresses submitting a special report.	Same comment as made for Section 3.4.7	Additional justification to address the Completion Time of Immediately has been incorporated into revised DOC M39 in Supplement 1.
3.4.8-3	A9	CTS 3.3.1.4.a	CTS 3.3.1.4.a requires that a Special Report be prepared and submitted to the NRC within 30 days. ITS 3.4.8 does not include this requirement. The discussion and justification have been deleted in the DOCs for this administrative change (DOC A9 "Not Used").	Provide discussion and justification for the administrative change.	The justification is provided in DOC L16. Also refer to corrected CTS markup page 3.3-5 for Specification 3.4.8 in CP&L letter dated January 17, 1997.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.8-4	L4	CTS 3.3.1.4.b	CTS 3.3.1.4.b requires that, if both RHR loops become inoperable, all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere be closed prior to the RCS average temperature exceeding 200°F. ITS 3.4.8 does not include this requirement. There is inadequate discussion and justification for this change from CTS requirements.	Same comment as made for Section 3.4.7	Additional justification to address removal of the containment closure requirement has been incorporated into revised DOC L4 in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.9-1	JD12	STS 3.4.9.a	STS 3.4.9.a requires Pressurizer water level ≤ 92% in MODES 1, 2, and 3 This is changed in the ITS to a MODE 1 requirement of Pressurizer water level ≤63. 3%, and a MODE 2 and 3 requirement of Pressurizer water level ≤92%. The justification provided for the MODE 2 and 3 requirement of ≤92% comes from where in the current licensing basis, system design, or operational constraints.	Provide justification for the STS deviation based on the current licensing basis, system design, or operational constraints.	Refer to revised JFD 12 in Supplement 1.
3.4.9-2	A13	CTS 3.1.3.4	CTS 3.1.3.4 requires that the reactor be maintained subcritical until "normal" water level is established in the Pressurizer. ITS 3.4.9 and b require Pressurizer water level ≤63.3% in MODE 1 and Pressurizer water level ≤92% in MODE 2 and 3 respectively. There is inadequate justification for this More Restrictive change as it unclear where the levels chosen come form.		DOC A13 states adequately the basis for identifying numeric values for normal pressurizer level in ITS as an administrative change to CTS. The values provided are more restrictive than the ISTS. Refer to revised JFD 12 in Supplement 1, which addresses the difference with ISTS.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.9-3	JD13	ITS SR 3.4.9.2	The STS SR 3.4.9.2 Frequency of 92 days is changed in the ITS to 18 months. The justification for this deviation is that there is personnel risk incurred while performing the required surveillance because permanent instrumentation is not installed, and that 18 months is consistent with current practice However, the risk is not quantified, there is no evidence that a cost benefit analysis has been performed, the results of which demonstrate installation of permanent instrumentation to be prohibitive, nor is there any discussion that equipment reliability supports an interval six times that of the STS.	Provide justification for the STS deviation based on the current licensing basis, system design, or operational constraints.	Additional justification for the 18 month Frequency has been incorporated into revised JFD 13 in Supplement 1. A cost benefit analysis has not been performed. A modification to install instrumentation is not proposed.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.10-1	L7	CTS 3.1.1.3. c.1	CTS 3.1.1.1.c.1 pressurizer code safety valve lift settings are maintained between 2485 psig and 2560 psig respectively ITS 3.4.10 pressurizer safety valve lift settings ≥ 2410 psig and ≥ 2560 psig. The discussion and justification do address that a higher setting is less restrictive setting but do not address that a lower safety valve lift setting is a More Restrictive change.	Provide discussion and justification for this More Restrictive change.	The change is less restrictive because the allowable range of lift settings for the pressurizer safety valve is increased. The actual setpoint will not change. The effect of this change will be to widen the range in which the safety valve can be considered operable and to allow for drift during valve setpoint test intervals, as permitted by Section III of the ASME Code.
3.4.10-2	L7	CTS 3.1.1.1. c.1	CTS 3.1.1.3.c.1 pressurizer code safety valve lift settings are maintained between 2485 psig and 2560 psig respectively. ITS 3.4.10 pressurizer safety valve lift settings ≥ 2410 psig and ≥ 2560 psig. The discussion and justification address the lift setpoint is 2485 ±3%, however, it appears the CTS lift setpoint is 2485 –0% +3%.		The change is less restrictive because the allowable range of lift settings for the pressurizer safety valve is increased. The nominal setpoint will not change. The effect of this change will be to widen the range in which the safety valve can be considered operable and to allow for drift during valve setpoint test intervals, as permitted by Section III of the ASME Code.
3.4.10-3	LA3	CTS 3.1.1.3.a	CTS 3.1.1.3.a requires that 1 Pressurizer code safety valve be operable whenever the Reactor Head is on the vessel and the RCS is not open for maintenance. This requirement is moved to "licensee controlled documents. " 1) The specific licensee controlled documents are not identified. And 2) Is the requirement going to maintained in addition to the requirements of ITS LCOs 3.4.10 and 3.4.12?	Identify the specific licensee controlled documents.	The requirement in CTS Section 3.1.1.3.a will be relocated to the Technical Requirements Manual. The Technical Requirements Manual will coexist with the Technical Specifications. At ITS implementation, the Technical Requirements Manual will be incorporated by reference into the UFSAR.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.10-4	M20	CTS 3.1.1.3	CTS 3.1.1.3.c requires that all 3 Pressurizer code safety valves be operable when RCS temperature is above 350°F. ITS 3.4.10 NOTE allows a provision that the lift settings do not have to be within the limits in MODE 3 for the purpose of setting the Pressurizer code safety valves under ambient conditions. The discussion and justification do not address this less restrictive part of the change.		Refer to new CTS markup page 3.1-3a, DOC L9, No Significant Hazards Consideration (NSHC) for L9, and ISTS markup page 3.4-21 in Supplement 1.
3.4.10-5	JD15	STS 3.4.10	ITS Applicability is MODES 1, 2, and 3. STS Applicability is MODES 1, 2, and 3 and MODE 4 with all RCS cold leg temperatures > [275]°F. The discussion and justification for the STS deviation do not adequately address the current licensing basis, system design, or operational constraints.	Provide justification for the STS deviation based on the current licensing basis, system design, or operational constraints.	The applicable analyses for LTOP was provided in Enclosure 5 of CP&L letter dated August 27, 1996, and CP&L letter dated February 16, 1997. Additional justification for the change to ISTS has been incorporated into JFD 15.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.11-1	NONE	ITS SR 3.4.11.3	Either the SR or the Bases should make it clear what components have to undergo functional testing.		CP&L has determined that there is no longer a need to distinguish functional testing of individual components as a means of satisfying this surveillance requirement. Refer to new DOC A30, revised CTS markup page 4.2-7a for ITS 3.4.11, revised ISTS markup page 3.4-26, revised ISTS Bases markup page B 3.4-56, revised proposed ITS SR 3.4.11.3, and revised ITS bases to SR 3.4.11.3.
3.4.11-2	A16	CTS 3.1.1.5.a	CTS 3.1.1.5.a requires specific actions be taken when one or both PORVs are inoperable "because of [leakage through the PORV resulting in excessive RCS leakage..." ITS 3.4.11 does not include an ACTION Condition of excessive leakage through the PORVs. A-16 explains that Action A of ITS LCO covers this situation requiring the block valve to be closed within an hour. However, this is inconsistent with LCO 3.4.13 Action A which allows four hours for reducing all other RCS LEAKAGE besides pressure boundary leakage.		When RCS leakage is identified as occurring through the PORV, and the PORV is determined to be capable of being manually cycled, ITS 3.4.11 Action A.1 is the Required Action that is applicable to this condition.
3.4.11-3	A17	CTS 3.1.1.5.a.2	CTS 3.1.1.5.a.2 does not allow separate Condition entry for each inoperable PORV. ITS 3.4.11 includes ACTIONS Note 1, "Separate Condition entry is allowed for each PORV." While consistent with the STS, this represents a Less Restrictive change, rather than an Administrative change.	Provide discussion and justification for this Less Restrictive change.	Additional justification for this change as an administrative change has been incorporated into revised DOC A-17 in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.11-4	M22	CTS 3.1.1.5 Footnote 2	CTS 3.1.1.5 Footnote 2, permits power operation to continue under certain conditions with a PORV block valve closed and power maintained to the block valve. ITS 3.4.11 Required Action A.1 permits power operation to continue with a PORV block valve closed and power maintained to the block valve. This retains the CTS requirement, and is therefore an Administrative change and not a More Restrictive change.	Provide discussion and justification for the Administrative change.	Additional justification for the more restrictive change is incorporated into revised DOC M22 in Supplement 1.
3.4.11-5	NONE	ITS SR 3.4.11.3 and Bases	Since functional test is not a defined term, the Bases should explain what constitutes an adequate functional test.		CP&L has determined that there is no longer a need to deviate from ISTS to distinguish functional testing of individual components as a means of satisfying this surveillance requirement. Refer to new DOC A30, revised CTS markup page 4.2-7a for ITS 3.4.11, revised ISTS markup page 3.4-26, revised ISTS Bases markup page B 3.4-56, revised proposed ITS SR 3.4.11.3, and revised ITS bases to SR 3.4.11.3.
3.4.11-6	LA4	CTS 4.2.4.1.a and CTS 4.2.4.3	CTS 4.2.4.1.a and CTS 4.2.4.3 requires performance of a PORV CHANNEL CALIBRATION and isolation of normal air and nitrogen supplies to the PORV accumulators when conducting the 18 month accumulator test, respectively. This detail is not retained in the ITS and is relocated to licensee controlled documents. The specific licensee controlled documents are not identified.	Identify the specific licensee controlled documents.	The relocated requirements of CTS Sections 4.2.4.1.a and CTS 4.2.4.3 will be relocated to the Technical Requirements Manual. At ITS implementation, the Technical Requirements Manual will be incorporated by reference into the UFSAR.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.11-7	NONE	STS SR 3.4.11.2	STS SR 3.4.11.2 Frequency has been changed from "[18] months" to "prior to entering MODE 2 from MODE 3 if not performed in the previous 18 months." There is no discussion or justification for the Frequency change.	Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	Refer to revised JFD 16 in Supplement 1.
3.4.11-8	NONE	ITS 3.4.11 Bases Applicable Safety Analysis	Explain 1) what is meant by the statement "not safety related" components and 2) if SG tube rupture has to be considered.		Explanation of the safety related function of the PORVs is provided in CP&L letter dated October 7, 1996, Submittal of Recent Changes to the H. B. "Robinson Steam Electric Plant, Unit No. 2, Technical Specification Bases."

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.12-1	JD15	STS 3.4.12	STS 3.4.12.a and b are incorporated into ITS 3.4.12 LCO a. Additional requirements are added as ITS 3.4.12.b, .c, and .d which address accumulator isolation, safety injection (SI), charging, and reactor coolant pumps capabilities and operation when all cold leg temperatures are ≥ 175°F, and SI pump capabilities when any cold leg temperature is < 175°F. There is no discussion or justification for the STS deviation.	Given that the HBR LTOP assumptions different than the STS, there are substantial deviations from the standard. Detail how specifically how the assumptions in JD-15 justify each deviation from the STS	Additional justification for the LTOP assumptions is provided in the references added to JFD 15 in Supplement 1.
3.4.12-2	JD15	STS 3.4.12 Applicability	STS 3.4.12 Applicability is MODE 4 when all RCS cold leg temperatures are ≤ [275]°F … ITS 3.4.12 Applicability for MODE 4 does not include the [275]°F cold leg temperature provision. There is no discussion or justification for the STS deviation.		Additional justification for the LTOP assumptions is provided in the references added to JFD 15 in Supplement 1.
3.4.12-3	JD15	STS 3.4.12 ACTIONS A & B	STS 3.4.12 ACTIONS A and B have been changed in ITS 3.4.12 ACTIONS to include a cold leg temperature requirement in ITS 3.4.12 ACTION A, a new ITS 3.4.12 ACTION B, an additional Condition C requiring one SI pump capable of injecting into the RCS, and a new ITS 3.4.12 ACTION D There is no discussion or justification for the STS deviation.		Additional justification for the LTOP assumptions is provided in the references added to JFD 15 in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.12-4	JD15	STS SR 3.4.12.1, and SR 3.4.12.2	STS SR 3.4.12.1, and STS SR 3.4.12.2 have been changed to include a Note in ITS SR 3.4.12.1 that this surveillance is only required to be met when all RCS cold leg temperatures ≥ 175°F, and to include a Note in ITS SR 3.4.12.2 that this is only required to be met when one SI pump is capable of injecting into the RCS. There is no discussion or justification for the STS deviation.		Additional justification for the LTOP assumptions is provided in the references added to JFD 15 in Supplement 1.
3.4.12-5	NONE	ITS 3.4.12	TS 3.4.12 Applicability is Mode 6 with the head on. The first and last sentences of the first paragraph of the Bases also support this position as do SR 3.4.12.8 and Action H.1. However, in the Bases for LCO 3.4.10 Applicability it is Mode 6 when the head is detensioned and not necessarily removed. Which is correct?		Both bases statements are correct. Overpressure protection from the pressurizer code safety valves is not required in MODE 6 with the reactor vessel head detensioned. Overpressure protection from the LTOP system is required in MODE 6 when the reactor vessel head is on.
3.4.12-6	NONE	ITS SR 3.4.12.6 and Bases	As stated, the NOTE is only required to be met when complying with LCO 3.4.12. b. Shouldn't that be LCO 3.4.12.a.2?		Corrections have been made in revised ISTS markup page 3.4-31, revised JFD 28, revised ISTS bases page B 3.4-70, revised proposed ITS page 3.4-35, and revised ITS Bases page B 3.4-72.
3.4.12.7	NONE	CTS 4.2.5.1.a	CTS 4.2.5.1.a requires performance of an ANALOG CHANNEL OPERATIONAL TEST (ACOT). ITS SR 3.4.12.8 requires performance of a COT (CHANNEL OPERATIONAL TEST). There is no discussion or justification addressing the difference, or equivalency, between an ACOT and a COT.	If the difference is explained in the Definitions section that can be referenced.	The CTS does not uniquely define the term Analog Channel Operation Test. Absent a definition, the term is considered to mean a Channel Operational Test of an analog channel. The terms are considered equivalent.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.12-8	NONE	ITS LCO 3.4.12	The Applicability indicates that the RCS temperature of concern is loop Tc. Why doesn't the graph reflect that?		Curves do not indicate which RCS temperature applies, hence the most limiting is assumed. This is the cold leg temperature. In the area of concern, the reactor is not critical and the temperature gradient across the core is small. The curves were incorporated into Technical Specifications by Amendment 149, by NRC letter dated July 29, 1994, as currently depicted.
3.4.12-9	NONE	ITS 3.4.12 Bases	In the BACKGROUND section under RCS Vent Requirements. The second paragraph appears to offer three specific options for setting up an acceptable vent path. However, as written it implies those are the only acceptable options. Is that the intent?		The bases are correct as stated. The reactor vessel head vent system has insufficient vent cross section to satisfy the LTOP analyses.
3.4.12-10	LA8	CTS Table 4.1.3 Item 14	CTS Table 4.1.3, Item 14 requires testing the filters associated with the RHR compartment fans. This detail is not retained in ITS 3.4.12 and is relocated to licensee controlled documents. The specific licensee controlled documents are not identified.	Identify the specific licensee controlled documents.	The relocated requirements of CTS Table 4.1.3, Item 14 will be relocated to the Technical Requirements Manual. At ITS implementation, the Technical Requirements Manual will be incorporated by reference into the UFSAR.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.13-1	M27 L10	CTS 3.1.5.3	CTS 3.1.5.3 addresses primary to secondary steam generator leakage in excess of 0.35 gpm per steam generator "or" 1 gpm total primary to secondary steam generator leakage through all steam generators. ITS 3.4.13.d only addresses 1 gpm total primary to secondary steam generator leakage through all steam generators. The CTS requirement of ≤0.35 gpm leakage through any one steam generator is not retained. This constitutes a Less Restrictive change because under the ITS more than .35 gpm is allowed to come from a single steam generator. There is no discussion or justification.	Provide discussion and justification for the Less Restrictive change.	The ITS LCO 3.4.13.e leakage requirement to any one steam generator of 500 gallons per day is equivalent to 0.3472 gallons per minute based upon three significant figures. This value is considered equivalent to the CTS value of 0.35 gallons per minute within the accuracy provided by the CTS limit. Therefore, the conversion from 0.35 gallons per minute to 500 gallons per day is considered administrative within the DOC A.1.
3.4.13-2	L11	CTS Table 4.1.3 Item 9	CTS Table 4.1-3, Item 9 requires RCS leakage evaluated "daily" when the RCS is above the cold shutdown condition. ITS SR 3.4.13.1 requires performance of an RCS water inventory balance Once within 12 hours after reaching steady state operation conditions and every 72 hours thereafter during steady state operation. This represents an extension to a CTS Surveillance Test Interval (STI).	L-11 does not explain any benefit to waiting until 12 hours after steady-state is achieved.	The additional justification for waiting until 12 hours after steady state operation is provided in revised DOC L11 in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.14-1	A25 A26	CTS 3.1.5.3.a	CTS 3.1.5.3.a requires that pressure isolation valves (PIVs) listed in CTS Table 3.1-1 function as PIVs. ITS 3.4.14 Applicability excludes those PIVs in the RHR flow path when in, or during the transition to or from, the RHR mode of operation. This change relaxes the CTS requirements, and is therefore a Less Restrictive change rather than an Administrative Change.`	Provide discussion and justification for the Less Restrictive change.	The change is administrative because the MODE exception meets the CTS Section 3.1.5.4.a requirement that the RHR PIVs be functional. Additional justification for the administrative change is provided in revised DOC A25.
3.4.14-2	LA5	CTS 3.1.5.4.a, 3.1.5.4.b, Table 3.1-1 and Table 4.1-3 (Item 17 and Foot notes a, b, c)	CTS 3.1.5.4.a, 3.1.5.4.b, Table 3.1-1, and Table 4.1-3 Item 17 and Footnotes a, b, c, provide a listing of PIVs and programmatic guidance related to PIV leakage testing. This detail is not retained in ITS 3.4.14 and is relocated to licensee controlled documents. The specific licensee controlled documents are not identified.	Identify the specific licensee controlled documents.	The relocated requirements of CTS Sections 3.1.5.4.a and 3.1.5.4.b, Table 3.1-1, Table 4.1-3 Item 17, and Footnotes a, b, and c, will be relocated to the Technical Requirements Manual. At ITS implementation, the Technical Requirements Manual will be incorporated by reference into the UFSAR.
3.4.14-3	LA5	CTS 3.1.5.4.b	CTS 3.1.5.4.b requires manual valves locked in the closed position. This requirement is not retained in ITS 3.4.14. There is no discussion or justification for this Less Restrictive change.	Provide discussion and justification for the Less Restrictive change.	CP&L prefers to maintain control of the CTS requirement to lock manual PIVs in the closed position under the 10 CFR 50.59 program, rather than to eliminate the requirement entirely. Therefore, the change is justified as a detail relocation, which will be retained in the Technical Requirements Manual. At ITS implementation, the Technical Requirements Manual will be incorporated by reference into the UFSAR.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.14-4	L12	CTS 3.1.5.4.b	CTS 3.1.5.4.b requires that, with leakage from any pressure isolation valve (PIV) not within limits, operation may continue provided at least two valves are in, and remain in, the mode corresponding to the isolated condition. (There is no time specified.) ITS 3.4.14 requires initial isolation of the high pressure line by a single valve within 4 hours, and by a second valve within 72 hours. The requirement for 1 valve isolation within 4 hours is a Less Restrictive change, but the second valve within 72 hours is a More Restrictive change because a time limit has been placed on the requirement.	Provide discussion and justification for the More Restrictive change.	The CTS does not provide an allowed outage time for PIV integrity that cannot be demonstrated. Any PIV integrity that is not demonstrated within limits is a condition prohibited by CTS until the conditions of CTS Section 3.1.5.4.b are met. Therefore, any change to provide an allowed outage time for PIV integrity not demonstrated is a less restrictive change. The change is less restrictive without regard to the proposed Completion Times for closing one or two valves.
3.4.14-5	NONE	CTS Table 4.1-3 Item 17	CTS Table 4.1-3 Item 17 requires periodic leakage testing on each valve in Table 3.1-1 accomplished prior to entering reactor operation condition after every time the plant is placed in the cold shutdown condition for refueling. ITS SR 3.4.14.1 Frequency requires this periodic leakage testing in accordance with the Inservice Testing Program. There is no discussion or justification for this change.	Provide discussion and justification for this change.	The CTS Table 4.-13 frequency of every cold shutdown for refueling is within the frequency specified in the ASME Code, Section XI, and therefore in accordance with the IST program. The CTS frequency of refueling is equivalent to the ITS frequency of 18 months. Therefore the justification of the change is within the scope of DOC A1. However, ISTS markup page 3.4-37 was marked incorrectly to delete 18 months from the Frequency and has been corrected in Supplement 1. Also refer to revised proposed ITS page 3.4-40.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.14-6	L13 A26	CTS TABLE 4.1-3 Item 17	CTS TABLE 4.1-3 Item 17, requires that PIV leakage be verified prior to entering reactor operation condition whenever the unit has been in cold shutdown for 72 hours. ITS 3.4.14 requires that PIV leakage be verified whenever the unit has been in MODE 5 for 7 days or more. The L-13 discussion and justification would apply equally as well to extending from 3 days to 18 months as it would from 3 days to seven day, the issue here is why is seven days not a problem as compared to three days.	Provide adequate justification for the Less Restrictive change.	It is appropriate to justify the change as less restrictive based upon the net reduction in PIV tests that will be conducted, since the interval between PIV tests can theoretically be a full operating cycle under both the CTS and the ITS Frequencies. Additional justification for seven (7) days is provided in DOC L13 in Supplement 1.
3.4.14-7	NONE	STS SR 3.4.14.1	STS SR 3.4.14.1 FREQUENCY requires the RCS PIVs leak tested every 18 months. ITS SR 3.4.14.1 FREQUENCY requires the RCS PIVs leak tested in accordance with the Inservice Testing Program. There is no discussion or justification for ;this STS deviation.	Provide justification for the STS deviation based on the current licensing basis, system design, or operational constraints.	ISTS markup page 3.4-37 was marked incorrectly to delete 18 months from the Frequency and has been corrected in Supplement 1. Proposed ITS page 3.4-40 has been corrected in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.14-8	NONE	CTS Table 3.1-1 Footnote 1	CTS Table 3.1-1, Footnote 1 states leakage rates less than or equal to 1.0 gpm are considered acceptable. ITS SR 3.4.14.1 indicates RCS PIV leakage of less than or equal to an equivalent of 5 gpm at an RCS pressure ≥ 2235 psig is acceptable. There is no discussion or justification for this Less Restrictive change.	Provide discussion and justification for the Less Restrictive change.	Justification of the change as an administrative change is provided in new DOC A31, and the markup of CTS page 3.1-19a has been revised in Supplement 1.
3.4.14-9	JD26	STS SR 3.4.14.1	STS SR 3.4.14.1 requires leakage from each RCS PIV is equivalent to ≤0.5 gpm per nominal inch of valve size. ITS SR 3.4.14.1 requires RCS PIV leakage is less than or equal to an equivalent of 5 gpm at an RCS pressure ≥ 2235 psig. The discussion and justification state this change is consistent with the current licensing basis, but no further detail is provided, and this limit is not included in the CTS.	Provide justification for the STS deviation based on the current licensing basis, system design, or operational constraints.	Justification of the change as an administrative change is provided in new DOC A32, and the markup of CTS page 3.1-19a has been revised in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
NO COMMENT					

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.16-1	LA6	CTS Table 4.1-2 Items 1 & 2, Notes 1 & 2	CTS Table 4.1-2, Items 1 and 2 and Notes 1 and 2 are moved to "licensee controlled documents." The specific licensee controlled documents are not identified.	Identify the specific licensee controlled documents.	The relocated requirements of CTS Table 4.1-2, Items 1 and 2 and Notes 1 and 2 will be relocated to the Technical Requirements Manual. At ITS implementation, the Technical Requirements Manual will be incorporated by reference into the UFSAR.
3.4.16-2	R1	CTS Table 4.1-2 Item 1	CTS Table 4.1-2, Item 1, "Oxygen and chloride concentration in the RCS," is moved to "licensee controlled documents." The specific licensee controlled documents are not identified.	Identify the specific licensee controlled documents.	The relocated requirements of CTS Table 4.1-2, Items 1 and 2 will be relocated to the Technical Requirements Manual. At ITS implementation, the Technical Requirements Manual will be incorporated by reference into the UFSAR.
3.4.16-3	LA7	CTS Table 4.1-2 Item 4	CTS Table 4.1-2, Item 4, "Boric Acid Tank boron concentration," is moved to "licensee controlled documents." The specific licensee controlled documents are not identified.	Identify the specific licensee controlled documents.	The relocated requirements of CTS Table 4.1-2, Item 4 will be relocated to the Technical Requirements Manual. At ITS implementation, the Technical Requirements Manual will be incorporated by reference into the UFSAR.
3.4.16-4	A24	CTS Table 4.1-2 Item 9	CTS Table 4.1-2, Item 9, "Stack Gas Iodine & Particulate Sample," is moved to CTS Table 4.10-2. CTS Table 4.10-2 is a "Relocated Specification." The discussion and justification indicate that this is a duplicate sampling requirement, when in fact the requirement is removed from the ITS constituting a Less Restrictive Change.	Provide discussion and justification for the Less Restrictive change.	DOC A24 is modified in Supplement 1 to clarify that the sampling requirement is duplicative of Table 4.10-2 which is relocated by DOC R1.
3.4.16-5	A23	CTS Table 4.1-2 Note 3	CTS Table 4.1-2 Note 3 is not retained in ITS 3.4.16. How does DOC A23 apply?	Provide discussion and justification for the Less Restrictive change.	The markup of CTS page 4.1-11 has been modified relocate Note 3 as LA10. This page and DOC LA10 has been included in Supplement 1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.4.16-6	A27	CTS Table 4.1-2 Note 6	CTS Table 4.1-2 Note 6 requires a sample taken after a minimum of 2 EFPD and 20 days of power operation have elapsed since the reactor was last subcritical for 48 hours or longer. ITS SR 3.4.16.3 Note, does not require sampling until 31 days after a minimum of 2 effective full power days and 20 days of MODE 1 operation have elapsed since the reactor was last subcritical for ≥ 48 hours. This is an extension of a CTS Surveillance Test Interval.	This extension to the CTS Surveillance Test Interval is outside the INEL scope of review. Note: Consistent with the STS.	This is not an extension of the CTS surveillance interval, since CTS Table 4.1-2 Note 6 does not impose a time limit for performance. The addition of the Note to ITS SR 3.1.16.3 is considered administrative since it is consistent with plant practice. Additional justification of this change as administrative is provided in DOC A27 in Supplement 1.

United States Nuclear Regulatory Commission
Attachment 3 to Serial: RNP-RA/97-0066
(29 Pages)

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION REGARDING THE TECHNICAL SPECIFICATIONS CHANGE REQUEST TO CONVERT TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS

SECTION 3.7, "PLANT SYSTEMS"

Comment #	DOC or JFD	CTS/ STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.1-1	M2	CTS 3.4.3	CTS 3.4.3 requires that, if the requirement of the secondary steam system (12 main steam safety valves OPERABLE) cannot be met within 24 hours, the operator initiate procedures to place the unit in the hot shutdown condition, and if the requirement cannot be met in an additional 48 hours, the reactor be cooled to below 350°F. ITS 3.7.1 requires that, if the main steam safety valve requirements can not be met in 4 hours, the unit be placed in MODE 3 in 6 hours, and in MODE 4 in 12 hours. There is inadequate discussion and justification for this More Restrictive change.	The Bases appear to provide the discussion that is missing.	Refer to revised DOC M2 in Supplement 1 which provides additional discussion and justification for this more restrictive change.

Comment #	DOC or JFD	CTS/ STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.1-2	A28	CTS TABLE 4.1-3 Item 4	CTS TABLE 4.1-3 Item 4 requires that each MSSV setpoint be verified in accordance with the Inservice Testing Program (IST). ITS SR 3.7.1.1 NOTE requires that this setpoint be verified in MODES 1 and 2 in accordance with the IST. How does A-28 explain the ITS SR 3.7.1.1 NOTE?		Additional justification of the NOTE as an administrative change is provided in revised DOC A28 in Supplement 1.
3.7.1-3	LA1	CTS TABLE 4.1-3 Item 12	CTS TABLE 4.1-3 Item 12 requires performance of a closure check on the turbine steam stop, control reheat stop, and interceptor valves. This requirement is moved to "licensee controlled documents." The specific licensee controlled document is not identified.	Identify the specific licensee controlled document.	The requirement in CTS Table 4.1-3 Item 12 will be relocated to the Technical Requirements Manual. At ITS implementation, the Technical Requirements Manual will be incorporated by reference into the UFSAR.

Comment #	DOC or JFD	CTS/ STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.1-4	JD2	STS TABLE 3.7.1-1	In STS Table 3.7.1-1, "OPERABLE MSSV Versus Applicable Power in percent of RTP, " applicable power levels are indicted as 100, 80, 60, and 40. In ITS Table 3.7.1-1, "OPERABLE MSSV Versus Applicable Power in percent of RTP, " applicable power levels are indicted as 100, 75, and 50. The discussion and justification for the STS deviation do not adequately address the current licensing basis, system design, or operational constraints which would necessitate using different applicable power levels.	Provide justification for the STS deviation based on the current licensing basis, system design, or operational constraints.	ISTS Table 3.7.1-1 is based on a plant design that includes 5 MSSVs per Steam Generator. However, the HBRSEP, Unit No. 2 design only includes 4 MSSVs per Steam Generator . The Bases of ITS 3.7.1 Required Action A.1 discusses the method used to develop the reduced RTP when MSSVs are inoperable. Since the relief capacities of each of the MSSVs are equivalent, the resultant plant specific power levels for inoperable MSSVs per Steam Generator are indicated as 100, 75, and 50 RTP in ITS Table 3.7.1-1. As a result, the power level requirements are revised to reflect the plant specific design of 4 MSSVs per Steam Generator as discussed in JFD 2 for ITS Section 3.7.

Comment #	DOC or JFD	CTS/ STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.1-5	M3	CTS 3.4.3	CTS 3.4.3 requires the operator initiate procedures to place the unit in the hot shutdown condition. ITS 3.7.1 Condition B requires the unit placed in MODE 3 in 6 hours and MODE 4 in 12 hours. Why are the more definitive action times appropriate.	Provide additional discussion and justification for the More Restrictive change.	Refer to revised DOC M3 in Supplement 1 which provides additional discussion and justification for this more restrictive change.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.2-1	M4	CTS 3.4.3	CTS 3.4.3 requires that if during power operation the requirements of CTS 3.4.1 (MSIVs OPERABLE) cannot be met within 24 hours, the operator initiate procedures to place the unit in the hot shutdown condition. ITS 3.7.2 Action B requires that if Action A, one MSIV inoperable in MODE 1, Completion Time of 24 hours cannot be met, the plant must be placed in MODE 2 in 6 hours. This results in a Less Restrictive change (hot shutdown versus MODE 2) for which there is inadequate discussion and justification.	Even if overall the change is determined to be more restrictive, the less restrictive components should be addressed.	CTS 3.4.3 requires that if during power operation the requirements of CTS 3.4.1 (MSIVs OPERABLE) cannot be met within 24 hours, the operator initiate procedures to place the unit in the hot shutdown condition (ITS MODE 3). CTS 3.4.3 also requires that if any of the requirements are not met in an additional 48 hours, the operator shall cool the reactor below 350°F (ITS MODE 4) using normal procedures. As discussed in DOC M4 for ITS Section 3.7, ITS 3.7.2 Required Action A.1 allows 24 hours to restore an MSIV to OPERABLE status, or Required Action B.1 will require the plant to be placed in MODE 2 within 6 hours. Once in MODE 2, ITS 3.7.2 Required Action C.1 requires the MSIV to be closed within 8 hours (DOC L.3 for ITS Section 3.7 discusses and justifies changing the Applicability to not include conditions when the MSIVs are closed). If ITS 3.7.2 Required Action C.1 is not met, then ITS 3.7.2 Required Actions D.1 and D.2 will require the plant to be placed in MODE 3 within 6 hours and in MODE 4 within 12 hours. Therefore, the ITS requirements for exiting the conditions of the Applicability do not end after entry into MODE 2 as implied in comment 3.7.2-1. In addition, the CTS does not specify a completion time for the plant to be in the hot shutdown condition, it only specifies a completion time for the operator to initiate procedures to place the unit in hot shutdown. Providing explicit completion times for placing the plant in the required MODES is a more restrictive change.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.2-2	L4	CTS 4.7.1	CTS 4.7.1 requires main steam stop valves tested at a frequency of each refueling interval or 15 ± 3 months, whichever occurs first. ITS 3.7.2 requires the valves tested at a Frequency in accordance with the Inservice Testing (IST) Program which is 18 months. There is inadequate discussion and justification for the extension of Surveillance Test Interval (STI). After one testing cycle the interval could exceed the CTS requirements of 15 ± 3 months.	Provide additional discussion and justification for the STI extension.	The CTS Surveillance interval of 15 ± 3 months could currently be extended up to 22.5 months in accordance with the allowance of CTS 4.0. The 18 month Surveillance interval of the IST Program may also be extended to 22.5 months in accordance with the allowance of ITS SR 3.0.2. The change is less restrictive because it removes the requirement for the CTS Surveillance to be performed within a 3 month band around the 15 month period. This is considered to be acceptable since testing is allowed by CTS 4.7.1 to be performed at each refueling interval or 15 ± 3 months (plus the 25% interval extension allowed by CTS 4.0), whichever occurs first. As a result, if a refueling was scheduled such that stroke time testing of the MSIVs would be performed at an interval less than 12 months, the CTS requirement would still be satisfied. In addition, performing the stroke time test at intervals less than 12 months does not have an impact on the reliability of the MSIVs. As stated in DOC L4 for ITS Section 3.7, the 18 month frequency (including the 25% interval extension allowed by ITS SR 3.0.2) has been shown, based on operating experience, to be acceptable for maintaining the reliability of the MSIVs.
3.7.2-3	None	STS ACTION C NOTE	STS 3.7.2 ACTION C NOTE allows separate condition entry for each MSIV. There is no discussion or justification for this Less Restrictive change.	Provide discussion and justification for the Less Restrictive change.	This change is not considered to be Less Restrictive since the CTS are considered to be "component" versus "condition" based and the added Required Actions provide appropriate compensatory measures for each MSIV on a component basis. Refer to revised DOC M4 in Supplement 1 which provides additional justification for this change.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.2-4	None	ITS SR 3.7.2.1	The SR and its Bases are not consistent. The SR is only performed in Modes 1 and 2. The Bases says only in Mode 3.		ITS SR 3.7.2.1 is modified by a Note that states that the MSIV stroke time Surveillance is "Only required to be performed in MODES 1 and 2." This Note allows appropriate conditions to be established for performance of the Surveillance. ITS SR 3.0.4 requires Surveillances to be performed prior to entry into the Applicability of the LCO and ITS 1.4 states that certain Notes modify the performance requirements. ITS SR 3.0.4 and the Note to ITS SR 3.7.2.1 allow the Surveillance to be initially performed after entry into MODE 3 but require performance to be completed prior to entry into MODES 1 and 2. Therefore, the ITS SR 3.7.2.1 Bases statement that the test be conducted in MODE 3 is considered to be consistent with the requirements of the Note to ITS SR 3.7.2.1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
None					

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.4-1	None	ITS 3.7.4 Bases	The discussion of the Applicability states "in the event it is called upon to function when MFW is lost." That is not consistent with the Applicable Safety Analysis which discusses loss of MFW and the FWLB.		The Applicable Safety Analyses section of the ITS 3.7.4 Bases in the discussion of the FWLB states that it is bounded by the steamline break. The UFSAR discussion of the steamline break identifies that main feedwater flow is terminated 14 seconds after the break. Therefore, the discussion in the Applicability section of the ITS 3.7.4 Bases stating "...the AFW System is required to be OPERABLE in the event that it is called upon to function when MFW is lost," is consistent with the Applicable Safety Analyses discussions of limiting Design Basis Accidents and transients for the AFW System.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.4-2	M7	CTS 3.4.5	CTS 3.4.5 requires at least one of two inoperable AFW pumps restored to OPERABLE status within 24 hours. ITS 3.7.4 Action B requires restoring 1 *motor* driven AFW pump or flow path to operable status within 24 hours and 8 days from discovery. This represents a new requirement for which there is no discussion or justification.	ITS Action B is only addressed in DOCs M 7-10 to say an ultimate completion time is added. There is no discussion of the addition of the motor driven pump only Action.	Refer to revised DOC M10 in Supplement 1 which provides additional discussion and justification for this change.
3.7.4-3	M10	CTS 3.4.5	CTS 3.4.5 states that with 2 AFW pumps inoperable one of the inoperable AFW pumps must be restored to OPERABLE status within 24 hours. ITS 3.7.4 ACTION B states 2 motor driven AFW pumps inoperable and 3 motor driven AFW flow paths inoperable. There is inadequate discussion and justification for the change.	See comment above.	Refer to revised DOC M10 in Supplement 1 which provides additional discussion and justification for this change.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.4-4	M11	CTS 4.8.1 and 4.8.2	CTS 4.8.1 and 4.8.2 require the AFW pumps (motor and steam driven) run for 15 minutes to determine that the pumps are OPERABLE. ITS SR 3.7.4.2 requires the AFW pumps be run to verify the developed head is greater than or equal to the required developed head. Deleting the 15 minutes makes the requirement less restrictive. Explain why getting the head data is more important than running the pump for a set amount of time.	Provide additional discussion and justification for the change.	Refer to new DOC L20 in Supplement 1 which provides discussion and justification for the deletion of the 15 minute run time requirement for the AFW pump test.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.4-5	L7	CTS 4.8.3	CTS 4.8.3 requires the AFW pump discharge valves tested monthly ITS SR 3.7.4.3 requires these valves tested at 18 months intervals. This represent an extension of Surveillance Test Interval (STI). The discussion needs to be improved. The L-7 justification is even though it is no longer 18 months it is monthly on a staggered basis. However, that is still longer than the CTS monthly interval so it does not adequately justify the change.		Refer to revised DOC L7 in Supplement 1 which provides additional discussion and justification for this change.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.4-6	JFD 7	STS 3.7.4 ACTION A	STS 3.7.4 ACTIONS A which address steam supply to AFW pumps has been replaced in ITS 3.7.4 ACTIONS A. As written JFD 7 implies that the steam driven AFW pump has one steam supply is that correct. If not, why isn't STS Action A adopted?		The HBRSEP, Unit No. 2 design is such that the power supply from both emergency power sources are needed to supply steam to the steam driven AFW pump and supply auxiliary feedwater to at least two steam generators. Since the HBRSEP, Unit No. 2 design does not incorporate the redundancy of the ISTS reference plant for the steam driven pump, ISTS 3.7.5 Condition A has not been included in HBRSEP, Unit No. 2 ITS 3.7.4.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.5-1	None	ITS 3.7.5	ITS 3.7.5 states the Condensate Storage Tank (CST) level shall be ≥35,000 gal and the backup Service Water System (SWS) supply to the AFW system shall be OPERABLE. ITS Action A.1 states that with CST not within limits verify by administrative means the OPERABILITY of backup water supply. Similarly, SR 3.7.5.2 requires verification by administrative means of the OPERABILITY of the backup SWS supply. 1) The wording of Action A.1 needs to indicate SWS as the backup means and 2) Verifying OPERABILITY by administrative means has two meanings in the TS Bases. In the Bases for SR 3.7.5.2 it is a lineup check and in the Bases for 3.7.5 Actions A.1 and A.2 it is a lineup check and verification of adequate SW level. Resolve the difference.		The Bases for ITS 3.7.5 Required Actions A.1 and A.2 are revised in Supplement 1 to reflect requirements for using the SWS as the backup feedwater supply for AFW when CST level is not within the required limit. The Bases for ITS Required Actions A.1 and A.2 and ITS SR 3.7.5.2 will now be consistent.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
No Comment					

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.7-1	M-23	ITS 3.7.7.1 and SR 3.7.7.2	ITS 3.7.7 requires two SWS trains and the Turbine Building loop isolation valves operable. However, the discussion and justification for the SR do not discuss why addition of only an electrical surveillance check on only one of the three turbine building isolation valves is adequate given the discussion of the isolation valves given in the BACKGROUND section of the 3.7.7 Bases.		ITS SR 3.7.7.2 requires that each automatic valve in the flow path that is not locked, sealed, or otherwise secured in the correct position, actuates to the correct position on an actual or simulated actuation signal. This Surveillance applies to automatic valves and includes all three turbine building isolation valves. ITS SR 3.7.7.4 is added to verify that the SWS automatic bus transfer switch associated with Turbine Building loop isolation valve V6-16C operates automatically on an actual or simulated actuation signal. As stated in the Background section of the Bases for ITS 3.7.7, only the power supply for Turbine Building loop isolation valve V6-16C includes the automatic bus transfer switch in the HBRSEP, Unit No. 2 design. The power supplies for the other two turbine building loop isolation valves do not have automatic bus transfer switches. Therefore, this Surveillance only applies to the automatic bus transfer switch of valve V6-16C.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.7-2	JD16	STS 3.7.7 Required Action A.1 Note 2	STS 3.7.7 Required Action A.1, Note 2 addresses entering the applicable condition for RHR loops when SWS is inoperable. This note is deleted in ITS 3.7.7 Required Action A.1. The discussion and justification for this STS deviation do not adequately address the current licensing basis, system design, or operational constraints for the deletion of Note 2. Specifically, the JFD and the TS Bases indicate that the system normally operates cross-connected but that is not discussed in the CTS. Where it is discussed in the UFSAR or the plant accident analysis.		The allowance to cross-connect the two SWS headers at the pump discharge is consistent with the HBRSEP, Unit No. 2 current licensing basis as documented in UFSAR Figure 9.2.1-1.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2, Response
3.7.8-1	JFD 1	STS 3.7.8 ACTION A and STS SR 3.7.8.3 and 3.7.8.4	The JFD is used as the justification for deletion of the Action and the SRs. However, the JFD justifies word preferences etc. In this case the issue is whether certain equipment is part of the licensing basis.	Provide justification for the STS deviation based on the current licensing basis, system design, or operational constraints.	The markup of ISTS 3.7.9 (ITS 3.7.8) and JFDs are revised in Supplement 1 to include new JFD 20. New JFD 20 states that Actions and Surveillances are modified to reflect the plant design basis and eliminate reference to cooling towers.
3.7.8-2	None	ITS SR 3.7.8.2	The SR says verify SW temp is less than or equal to 95 degrees F. The Bases for the SR says it verifies average service water temperature. If an average is used then the Bases should explain that average.		The Bases of ITS SR 3.7.8.2 has been revised in Supplement 1 for consistency with ITS SR 3.7.8.2. The word "average" is deleted from the Bases for ITS SR 3.7.8.2.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2, Response
3.7.8-3	None	ITS LCO 3.7.8 Bases	The Bases discuss UHS temperature while the TS refer to SW temperature. Is there a difference? If not, why is the wording not consistent?		As discussed in the Bases for ITS 3.7.8, the UHS (Lake Robinson impoundment) provides the water supply for the SWS through a submerged inlet and conduit system. The function of the UHS is to ensure the SWS is capable of performing its intended cooling function. Therefore, verifying UHS temperature using SWS temperature is consistent with safety analysis assumptions and provides an equivalent means of verifying that the UHS is capable of performing its support function for the SWS. The text is not consistent since ITS SR 3.7.8.2 describes where the UHS temperature is to be verified (i.e., in the SWS).

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.9-1	None	ITS SR 3.7.9.4 and 3.7.9 Bases	SR 3.7.9.4 and its Bases state the acceptance limit as 400 cfm as does the Background section of the 3.7.9 Bases. However, in the LCO section of the Bases the limit is 400 scfm.		The LCO section of the ITS 3.7.9 Bases is revised in Supplement 1 to achieve consistency with ITS SR 3.7.9.4 and its associated Bases.
3.7.9-2	L14	CTS 4.15.c	CTS 4.15.c, requires verifying the Control Room Air Conditioning System maintains a positive pressure in the control room when operating in the emergency pressurization mode. This must be performed on a 31 day STAGGERED TEST BASIS. ITS SR 3.7.9.4 requires verification of positive pressure in the control room under measured conditions at an 18 month Frequency on a STAGGERED TEST BASIS. This change represents an extension to a CTS Surveillance Test Interval (STI) for which the discussion should justify whether performance history supports going from every 62 days to every 36 months for each train.		Refer to revised DOC L14 in Supplement 1 which provides additional discussion and justification for this change.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.9.3	None	ITS 3.7.9 Bases	The LCO section of the Bases leaves out the "or equivalent to any part of the body" correctly included in the Background section.		The LCO section of the ITS 3.7.9 Bases is revised in Supplement 1 to achieve consistency with the Background section of the ITS 3.7.9 Bases.
3.7.9-4	JD18	STS 3.7.9	ACTION F is added to ITS 3.7.9 which requires the plant to be in MODE 3 in 6 hours and MODE 5 in 36 hours, if Required Action E.1 and the Completion Time of Condition E are not met. JD18 addresses the 48 hrs of Condition E. However, there is no discussion of Condition F.	Provide justification for the STS deviation based on the current licensing basis, system design, or operational constraints.	Refer to revised JFD 18 in Supplement 1 which provides justification for this change based on current licensing basis.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.9-5	L12	CTS 3.15.2.b	CTS 3.15.2.b, requires suspending any operation which would reduce shutdown margin to less than that required for cold shutdown or refueling. This requirement is not retained in the ITS and it is unclear why given there is no explanation why it was included in the CTS. There is inadequate discussion and justification for the Less Restrictive change.	Provide additional discussion and justification for this Less Restrictive change.	Refer to revised DOC L12 in Supplement 1 which provides additional discussion and justification for this change.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.10-1	L16	CTS 3.15.1.a and 3.15.2.a	CTS 3.15.1.a and 3.15.2.a. require restoring an inoperable train of the Control Room Air Conditioning System to operable status within 7 days. ITS 3.7.10 requires restoring the inoperable train to OPERABLE status within 30 days. L16 discusses alternative safety and nonsafety cooling as part of the justification, provide some specific discussion of those capabilities.		HBRSEP, Unit No. 2 does not currently have any preplanned alternate cooling means available. Therefore, DOC L16 is revised in Supplement 1 to reflect the fact that the 30 day allowed outage time is based on the low probability of an event requiring control room isolation and operation of the remaining control room air conditioning train during the time one control room air conditioning train is inoperable and consideration that the remaining train can provide the required function.
3.7.10-2	LA3	CTS 4.15.a	CTS 4.15.a requires verification the Control Room air temperature is less than or equal to 85 degrees F at least once per 12 hours. This Surveillance Requirement is not retained in ITS 3.7.10 and is moved to licensee controlled documents. The specific licensee controlled document is not identified.		The requirement in CTS 4.15.a will be relocated to the Technical Requirements Manual. At ITS implementation, the Technical Requirements Manual will be incorporated by reference into the UFSAR.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.11-1	L19	CTS 3.8.2.e	CTS 3.8.2.e requires "fuel handling operations" terminated if the Spent Fuel Building filter system is inoperable. ITS 3.7.11 Required Action A requires "movement of irradiated fuel assemblies be suspended" if the Spent Fuel Building filter system is inoperable. The discussion and justification state that fuel handling involves more than movement of irradiated fuel assemblies but fail to establish whether or not any of the activities being eliminated in the wording change are potentially more limiting to the FBACS than movement of irradiated fuel assemblies.	Provide additional discussion and justification for the Less Restrictive change.	Refer to revised DOC L19 in Supplement 1 which provides additional discussion and justification for this change.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.12-1	None	ITS 3.7.12	This specification is not in the CTS therefore it is not clear where the 21 foot limit comes. Provide the UFSAR or accident analysis reference that supports that value.		A discrepancy has been found in the current licensing basis (i.e., UFSAR) which reflects utilization of Regulatory Guide 1.25 in the offsite dose consequences analysis for a fuel handling accident. This condition is currently being evaluated. Additional justification of this value will be provided when the evaluation of the discrepancy is completed.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.13-1	M35	CTS 5.4.4	CTS 5.4.4 is modified in ITS 3.7.13 Required Action A, which requires that fuel movement be suspended in the event spent fuel storage pool boron concentration is not ≥ 1500 ppm. There is inadequate discussion and justification for this More Restrictive change.	The Bases appear to contain the information required.	Refer to revised DOC M35 in Supplement 1 which provides additional discussion and justification for this change.
3.7.13-2	None	ITS 3.7.13	Provide the basis for 1500 ppm boron as the limit.		The basis for the 1500 ppm boron concentration limit is documented in EMF-94-113, "H.B.Robinson New and Spent Fuel Criticality Analysis," Siemens Power Corporation, dated July 1994. This analysis was transmitted to the NRC by CP&L letter dated July 28, 1994. As part of this analysis, fuel handling criticality limits were evaluated. The results of the evaluation demonstrated that a boron concentration of 1000 ppm was adequate to provide margin to criticality during fuel handling. Therefore, the 1500 ppm limit is bounding.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.13-3	M36	CTS Table 4.1.2 Item 7	CTS Table 4.1-2, Item 7, requires spent fuel pit boron concentration to be analyzed prior to refueling or new fuel movement in the spent fuel pit. ITS SR 3.7.13.1 requires fuel storage pool boron concentration analyzed at a Frequency of 7 days. There is inadequate discussion and justification for this More Restrictive change. The discussion states this is a new requirement, is more restrictive and has no adverse impact on safety.	See comment #1 above.	Refer to revised DOC M36 in Supplement 1 which provides additional discussion and justification for this change.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.14-1	M37 and JFD 27	CTS 5.4.2.1	CTS 5.4.2.1 is modified to adopt ITS 3.7.14 in its entirety. This adds new and spent fuel storage requirements. There is inadequate discussion and justification for these new requirements. The discussion states that this is a new requirement, is more restrictive and has no impact on safety. For example there is no discussion of why the STS and its Figure 3.7.17-1 are not adopted.		The markup of CTS page 5.4-1 was corrected to reference new DOC LA6, a new DOC LA6 was added, and JFD 27 was augmented to justify the deviation from ISTS in accordance with the current licensing basis.

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.7.15-1	L18	CTS Table 4.1.2 Item 8	CTS Table 4.1-2, Item 8, requires analysis for secondary specific activity at Frequencies of: minimum 1 per 72 hours with 3 days maximum time between tests; 2) 1 per 31 days whenever the gross activity determination indicates iodine concentrations are greater than 10% of the allowable limit; and 3) 1 per 6 months whenever the gross activity determination indicates iodine concentrations are less than 10% of the allowable limit. ITS SR 3.7.15.1 requires the equivalent analysis be performed at a Frequency of 31 days. The discussion and justification address the Less Restrictive change but do not address the More Restrictive change from 1 per 6 months to 31 days when less than 10 percent of allowable limit.		The ITS Frequency is not more restrictive than the CTS Frequency requirement of "1 per 6 months" because the CTS Frequency requirement of "1 per 72 hours" is always limiting. Additional justification of the less restrictive change is provided in DOC L18 in Supplement 1.