August 14, 1998

Mr. Gregory M. Rueger, Senior Vice President
and General Manager
Pacific Gas and Electric Company
Nuclear Power Generation N9B
P.O. Box 770000
San Francisco, California 94177

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON THE PROPOSED CONVERSION TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS FOR DIABLO CANYON POWER PLANT, UNIT NOS. 1 AND 2 (TAC NOS. M98984 AND M98985)

Dear Mr. Rueger:

The Nuclear Regulatory Commission staff is reviewing Pacific Gas & Electric Company's proposed license amendment to convert the current technical specifications for the Diablo Canyon Power Plant, Unit Nos. 1 and 2, to the Improved Standard Technical Specifications. Pacific Gas & Electric Company provided their proposed license amendment request by letter dated June 2, 1997.

The staff has reviewed selected portions of the application. Based on its review, the staff has determined that additional information is needed in Section 3.7, Plant Systems, as discussed in the enclosure. Since you worked with three other utilities in preparing your submittal, the enclosure contains the request for additional information (RAI) questions for all four utilities. However, you need only reply to the RAI questions associated with Diablo Canyon Power Plant, Unit Nos. 1 and 2, as identified in the enclosure.

To assist the staff in maintaining its review schedule, please respond to the questions pertaining to Diablo Canyon Power Plant, Unit Nos. 1 and 2 within 30 days of the date of this letter. If you have any questions regarding the RAI, please contact me at (301) 415-1313. If all four utilities would like to have a common discussion, a single meeting, or phone call, it can be coordinated by contacting the NRR Lead Project Manager, Jack Donohew at (301) 415-1307.

Sincerely,
Original Signed By Kristine M. Thomas for

Steven D. Bloom, Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-275
and 50-323

Enclosure: Request for Additional Information

cc w/encl: See next page

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cc w/encl:
NRC Resident Inspector
Diablo Canyon Nuclear Power Plant
c/o U.S. Nuclear Regulatory Commission
P. O. Box 369
Avila Beach, California 93424

Dr. Richard Ferguson, Energy Chair
Sierra Club California
1100 11th Street, Suite 311
Sacramento, California 95814

Ms. Nancy Culver
San Luis Obispo
Mothers for Peace
P. O. Box 164
Pismo Beach, California 93448

Chairman
San Luis Obispo County Board of
Supervisors
Room 370
County Government Center
San Luis Obispo, California 93408

Mr. Truman Burns
Mr. Robert Kinosian
California Public Utilities Commission
505 Van Ness, Room 4102
San Francisco, California 94102

Mr. Steve Hsu
Radiologic Health Branch
State Department of Health Services
Post Office Box 942732
Sacramento, California 94232

Diablo Canyon Independent Safety
Committee
ATTN: Robert R. Wellington, Esq.
Legal Counsel
857 Cass Street, Suite D
Monterey, California 93940

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

Christopher J. Warner, Esq.
Pacific Gas & Electric Company
Post Office Box 7442
San Francisco, California 94120

Mr. Robert P. Powers
Vice President and Plant Manager
Diablo Canyon Nuclear Power Plant
P. O. Box 56
Avila Beach, California 93424

Telegram-Tribune
ATTN: Managing Editor
1321 Johnson Avenue
P.O. Box 112
San Luis Obispo, California 93406

3.7.1 Main Steam Safety Valves (MSSVs)

3.7.1.-1

CTS 3.7.1.1, LCO Statement
ITS 3.7.1, LCO Statement
DOC 01-01-A

CTS 3.7.1.1 LCO requires the MSSVs operable per Table 3.7-2. The STS 3.7.1 requires the MSSVs Operable as specified in Table 3.7.1-1 and Table 3.7.1-2. The ITS 3.7.1 states the MSSVs are Operable but deletes the phrase "as specified in Table 3.7.1-1 and Table 3.7.1-2".

Comment: DOC 01-01-A states this is consistent with the NUREG-1431. This is not the case. Revise the submittal to retain the STS format which is an administrative reformatting change of the CTS requirement.

FLOG Response:

3.7.1.-2 (CPSES)

CTS 3.7.1.1 Action a
ITS 3.7.1 Actions Note
DOC 01-02-LS1

ITS 3.7.1 adds a new Actions Note that states, "Separate Condition entry is allowed for each MSSV". The markup for CTS 3.7.1.1 states "Separate entry time is allowed for each MSSV."

Comment: Revise the CTS markup to be consistent with the ITS 3.7.1 Actions Note.

FLOG Response:

3.7.1.-3 (DCPP)

CTS 3.7.1.1 Action a
ITS 3.7.1 Required Actions A.1 and A.2
DOC 01-xx-A

CTS 3.7.1.1 Action a states that "operation in MODES 1 and 2 may proceed provided ..." ITS 3.7.1 Required Actions A.1 and A.2 imply that operation may continue if the Required Actions are met.

Comment: There is no explanation for the deletion of this CTS requirement. The requirement is still applicable in the ITS because the explicit statement of the CTS is no longer necessary due to the general requirements of ITS Section 1.3, Completion Times. Either revise the submittal to justify this deletion or revise the CTS markup and retain this requirement.

FLOG Response:

3.7.1.-4

CTS 3.7.1.1 Action a
ITS 3.7.1 Action A.1 and A.2 and Table 3.7.1-1
DOC 01-04-LS3
JFD 3.7-01

This change is beyond the scope of a conversion because of the industry travelers referenced in this DOC (WOG-83, Rev 0 and Rev. 1) that have not been approved by the NRC.

Comment: Withdraw the change or adopt the STS.

FLOG Response:

3.7.1.-5

CTS 3.7.1.1 Action b
ITS 3.0.4 and ITS SR 3.7.1.1
DOC 01-05-M

CTS 3.7.1.1 Action b states that "The provisions of Specification 3.0.4 are not applicable." A note in ITS SR 3.7.1.1 states the SR is only required in Modes 1 and 2.

Comment: This change is in accordance with the STS and it is acceptable. However, the DOC is incorrectly justified as a "more restrictive change. ITS 3.0.4 has been revised to permit the placement of Notes, as in this case, that permit entry into Modes of operation where the LCO Operability can be established. This is an administrative change that reformats the CTS requirements for the purpose of clarification by explicitly stating the reason for Specification 3.0.4 not being applicable. Revise the submittal to provide an "A" DOC.

FLOG Response:

3.7.1.-6 (WCGS)

CTS 3.7.1.1 Action b
ITS 3.0.4 and ITS SR 3.7:1.1
DOC 01-05-M

CTS 3.7.1.1 Action b states that "The provisions of Specification 3.0.4 are not applicable." ITS 3.7.1 deletes this action and adds a note in ITS SR 3.7.1.1 stating the SR is only required in Modes 1 and 2.

Comment: For this change, the ITS is acceptable; however, the CTS markup should indicate that action b is not retained. Revise the CTS markup.

FLOG Response:

3.7.1.-7 CTS 3.7.1.1 Actions
ITS 3.7.1 Action B
DOC 01-06-M

ITS Action B adds a new condition for when "one or more steam generators with less than two MSSVs OPERABLE", then MODE 4 is entered to exit LCO Applicability. CTS 3.7.1.1 Actions would require the more severe LCO 3.0.3 shutdown for this degraded condition.

Comment: This change is not "more restrictive". In this degraded condition, the loss of one hour is immaterial since the one hour is insufficient time to return all the MSSVs to Operable. The one hour period is the normal allocation of time to plan for an orderly plant shutdown. It is less restrictive to place the unit in Mode 4 rather than in Mode 5. The "more" and the "less" restrictive features of this change are acting as opposites. Therefore, this change should include all this discussion and then be revised as an administrative reformatting of the CTS Table 3.7-1 requirements.

FLOG Response:

3.7.1.-8 (Callaway) (WCGS) CTS 3.7.1.1 Action a
ITS 3.7.1 Action B
DOC 01-12-A

CTS 3.7.1.1 Action a requires the MSSVs to be restored to Operable status within 4 hours or the Power Range Neutron Flux High Trip Setpoints are reduced. If those actions are not completed, then the unit is placed in Mode 5 within 36 hours. ITS 3.7.1 Action B only requires placing the unit in Mode 4 within 12 hours where the LCO is not applicable.

Comment: The CTS requirement to place the unit in Mode 5 is explicit and must be carried out if the MSSVs are not returned Operable during the shutdown activities. The ITS change is less restrictive because the unit can remain indefinitely in Mode 4 for repairs rather than going into Mode 5. Revise the submittal to justify this DOC 01-12-A change as "less restrictive."

FLOG Response:

3.7.1.-9 (DCPP) CTS 3.7.1.1, Table 3.7-2
ITS 3.7.1, Table 3.7.1-2
JFD 3.7-27

CTS Table 3.7-2 provides the requirements for the tolerance of the lift settings for each valve. ITS Table 3.7.1-2 provide the requirements as a note.

Comment: The note in the lift setting column is confusing and indirect. Since the lift setting tolerance is different, it is recommended to revert back to the CTS presentation of the tolerance identified after each set pressure.

FLOG Response:

3.7.1.-10 (DCPP) Bases ITS 3.7.1, Reference Item #2
DOC 01-yy-A

Bases ITS 3.7.1, Reference Item #2 is not adopted which pertains to the applicable ASME Code. In the Applicable Safety Analysis and the LCO discussion, Reference #2 is still utilized.

Comment: Revise the submittal to retain Reference item #2.

FLOG Response:

3.7.2 Main Steam Isolation Valves (MSIVs)

3.7.2.-1 (CPSES)
(WCGS)
(Callaway)
CTS 3.7.1.5, All Actions
ITS 3.7.2, Action A, C, D, and E
DOC 05-03-LS-12
JFD 3.7-34

These changes are beyond the scope of a conversion because the industry travelers referenced in this DOC (WOG-64 and TSTF 30) have not been approved by the NRC.

Comment: Withdraw the changes or adopt the STS.

FLOG Response:

3.7.2.-2 (Callaway and WCGS) CTS 4.7.1.5
ITS SR's 3.7.2.1 and 3.7.2.2
DOC 05-xx-LSx

CTS 4.7.1.5 states the provisions of Specification 4.0.4 are not applicable for entry into Mode 3. ITS SR's 3.7.2.1 and 3.7.2.2 state they are "Only required to be performed in Modes 1 and 2".

Comment: Provide the technical basis for this change. A similar JLS change was only explained for DCPP and CPSES under change number 05-07-LS23.

FLOG Response:

3.7.2.-3 CTS 4.7.1.5
ITS SR 3.7.2.1 and SR 3.7.2.2
DOC 05-08-M
JFD 3.7-56

These changes are beyond the scope of a conversion because the industry traveler referenced in this DOC (WOG-98) has not been approved by the NRC.

Comment: Withdraw the changes or adopt the STS.

FLOG Response:

3.7.2.-4 (CPSES) CTS 3.7.1.5 Action for Modes 2 and 3
ITS 3.7.2 Actions Note
DOC 05-ww-LSw

ITS 3.7.2 adds a new Actions Note that states, "Separate Condition entry is allowed for each MSIV". The markup for CTS 3.7.1.5 states "Separate entry time is allowed for each MSIV."

Comment: Revise the CTS markup to be consistent with the ITS 3.7.2 Actions Note.

FLOG Response:

3.7.3 Main Feedwater Isolation Valves (MFIVs)

3.7.3.-1 (DCPP) CTS 3.7.1.7 LCO Statement
ITS 3.7.3 LCO Statement
DOC 07-01-A

CTS 3.7.1.7 applies to each MFIV, each MFRV and each MFRV bypass valve. ITS 3.7.3 LCO title and LCO statement apply to MFIV, MFRV and the associated bypass valves.

Comment: The ITS implies that the MFIV has an associated bypass valve. Clarify the title and LCO statement to be "MFIV, MFRV and the associated MFRV bypass valves".

FLOG Response:

3.7.3.-2 (CPSES)	CTS 3.7.1.6 LCO and Actions ITS 3.7.3 LCO, Applicability, Actions and SRs DOC 07-08-LS26 DOC 07-09-LS10 JFD 3.7-11, 3.7-26 DOC 07-10-M DOC 07-17-A

These changes are beyond the scope of a conversion.

Comment: Provide additional justification.

FLOG Response:

3.7.3.-3	CTS 4.7.1.6[7] ITS SR 3.7.3.1 and SR 3.7.3.2 DOC 05-08-M JFD 3.7-56

These changes are beyond the scope of a conversion because the industry traveler referenced in this DOC (WOG-98) has not been approved by the NRC.

Comment: Withdraw the changes or adopt the STS.

FLOG Response:

3.7.3.-4 (Callaway and WCGS)	CTS 4.7.1.6[7] ITS SRs 3.7.3.1 and 3.7.3.2 DOC 07-aa-LSa JFD 3.7-25

CTS 4.7.1.6[7] states the provisions of Specification 4.0.4 are not applicable for entry into Mode 3. ITS SRs 3.7.3.1 and 3.7.3.2 state they are "Only required to be performed in Modes 1 and 2".

Comment: Explain the technical basis for this change in a DOC. This is the complementary CTS change to match the ITS JFD 3.7-25 already provided.

FLOG Response:

3.7.3.-5 (DCPP) CTS 4.7.1.7.1 and 4.7.1.7.2
ITS SR's 3.7.3.1 and 3.7.3.2
DOC 07-xx-LG

CTS 4.7.1.7.1 and 4.7.1.7.2 require determination of the valve isolation times to occur within a specified time which is qualified with the phrase "... not including the instrument delays." The ITS does not retain this "phrase".

Comment: There is no DOC to state where these SR detail requirements have been moved. This CTS requirement is expected to be moved to the Bases and/or to an Licensee Controlled Document such as the various surveillance procedures. Revise the submittal to provide this explanation.

FLOG Response:

3.7.3.-6 (CPSES) ITS 3.7.3 LCO Note
JFD 3.7-11

The ITS 3.7.3 has an LCO Note that states "The associated bypass valves for each FIV are the feedwater isolation bypass valve and the associated feedwater preheater bypass valve."

Comment: This type of system description should be located in the Bases Background discussion or LCO discussion to define the Operability requirements for the components in this LCO. Revise the ITS submittal to move this information to the Bases.

FLOG Response:

3.7.4 Atmospheric [Steam] Dump [Relief] Valves (ADVs), [ASDs], [ARVs]

3.7.4.-1 (DCPP) (CPSES) CTS 3.7.1.6[7] Actions a and b
ITS 3.7.4 Actions B and C
DOC 06-05-LS24
JFDs 3.7-05 and 3.7-06

CTS 3.7.1.6[7] Actions have been modified and new requirements are added for when three or more ADVs are inoperable. ITS 3.7.3 Actions B and C contain these new requirements.

Comment: Per the Bases LCO discussion, two ADVs are required for unit cool down. Therefore, TSTF-100 is not applicable. Hence, ITS Actions B and C can be accepted if the Required Action wording is changed to match the CTS markup. Required Action B.1 should state "Restore at least one ADV [ARV] line to OPERABLE status." Required Action C.1 should state "Restore at least two ADV [ARV] lines to OPERABLE status." **[Note for CPSES: The**

CTS Action b appears to be incorrect or overly conservative requiring 3 Operable while in a multiple condition entry with Action a.] The DOC 06-05-LS24 does not contain the technical justification that this is acceptable which is the acknowledgement of the diverse backup methods of the Steam Bypass System and the MSSVs. Also, the corresponding JFD's 3.7-05 and 3.7-06 do not contain any technical justification for these changes. Revise the submittal accordingly.

FLOG Response:

3.7.4.-2 (DCPP)

CTS 4.7.1.6.c
ITS SR 3.7.4.1
DOC 06-aa-LSa

The CTS markup for CTS 4.7.1.6.c states each ADV will be cycled "each refueling interval" rather than "once per 18 months". ITS SR 3.7.4.1 Frequency is 24 months.

Comment: The Bases state the Frequency is 24 months which is not consistent with the CTS markup. These changes have been proposed without any DOC or JFD. There is no technical justification provided for these CTS changes. Adopt the STS text or withdraw these CTS changes.

FLOG Response:

3.7.4.-3 (DCPP)

CTS 4.7.1.6.a
ITS SR 3.7.4.3
JFD 3.7-50

CTS 4.7.1.6.a and ITS SR 3.7.4.3 both pertain to verification that the backup air bottle has pressure every 24 hours.

Comment: ITS SR 3.7.4.3 is acceptable; however, due to the shorter frequency of this SR, it should be placed as the first SR and the other SRs renumbered.

FLOG Response:

3.7.4.-4 (Callaway) (WCGS)

CTS 3.7.1.6[7] Actions a and b
ITS 3.7.4 Required Action C.2, Completion Time
DOC 02-20-LS35
JFD 3.7-04

If one or more ADVs is not restored, CTS 3.7.1.6[7] Actions requires Mode 3 entry in 6 hours and entry into Mode 4 in an additional 6 hours. ITS 3.7.4 permits an additional 12 hours for entry to Mode 4.

Comment: This total 18 hour Completion Time, for entry into Mode 4, is for when the Applicability of the LCO has been extended to cover the extra time spent in Mode 4, while the steam generator is relied upon for heat removal per the STS. Callaway and WCGS have elected to not adopt the revised STS Applicability, so the current licensing basis of 12 hours total time must be retained. JFD 3.7-04 does not discuss the technical basis for receiving the extra 6 hours of Completion Time. The DOC referenced is not applicable. Revise the submittal to retain the current licensing basis or adopt the STS Applicability text.

FLOG Response:

3.7.4.-5	**(CPSES)**	CTS 4.7.1.6[7]
	(Callaway)	ITS SR 3.7.4.1
	(WCGS)	JFD 3.7-28

CTS 4.7.1.6[7] states the surveillance is in accordance with Specification 4.0.5. ITS SR 3.7.4.1 requires one complete cycle of the ASD[ARV] in accordance with the Inservice Testing Program. The STS requires a frequency of "18 months" instead of "per the IST Program." This change is beyond the scope of a conversion.

Comment: Withdraw the change or adopt the STS.

FLOG Response:

3.7.4.-6	**(Callaway**	CTS 4.7.1.7
	(CPSES)	ITS SR 3.7.4.2
		DOC 06-04-M
		JFD 3.7-28

CTS 4.7.1.7 states the surveillance is in accordance with Specification 4.0.5. ITS SR 3.7.4.2 adds a new SR requirement to verify one complete cycle of the ASD[ARV] manual isolation valve in accordance with the Inservice Testing Program. The STS requires a frequency of 18 months instead of per the IST Program.

Comment: Withdraw the change or adopt the STS.

FLOG Response:

3.7.4.-7	**(CPSES)**	CTS 4.7.1.6[7], [Item a]
	(Callaway)	Bases ITS 3.7.4, LCO discussion
	(WCGS)	DOC 06-06-LG

For CPSES, the CTS 4.7.1.7, item a surveillance on the air accumulator tank pressure is not retained in the ITS but it is moved to a licensee controlled document. For Callaway and WCGS,

there is no CTS requirement but the Bases LCO discussion states the Operability requirements for the nitrogen accumulator tank pressure.

Comment: For DCPP, this equivalent CTS surveillance is retained in the ITS. For all others, it is required to explain why this similar surveillance is not being retained or added to the ITS. Revise the submittal to add this new SR performed every 24 hours to ITS 3.7.4.

FLOG Response:

3.7.4.-8 (CPSES)

CTS 3.7.1.7, Applicability, Action a and b
ITS 3.7.4, Applicability, Required Action C.2, and Completion Time
DOC 02-20-LS35
JFD 3.7-04

If one or two ADV's are not restored to Operable, CTS 3.7.1.7 Actions requires Mode 3 entry in 6 hours and entry into Mode 4 in an additional 6 hours. ITS 3.7.4 permits an additional 12 hours for entry into Mode 4.

Comment: CPSES has not adopted the STS Applicability extending into Mode 4 until the "steam generator is no longer relied upon for heat removal." CTS 3.7.1.7 Action a and b both require the RCS/RHR loops to be placed in operation which directly implies the STS Applicability is a CTS requirement (perhaps due to the transition temperature being below the Mode 4 limits). The STS permitted total 18 hour Completion Time, for entry into Mode 4, is only for when the Applicability of the LCO has been extended to cover the extra time spent in Mode 4, while the steam generator is relied upon for heat removal. Therefore, CPSES should adopt the revised STS Applicability or retain the current licensing basis of 12 hours total time. JFD 3.7-04 does not discuss the technical basis for receiving the extra 6 hours of Completion Time. The DOC referenced is not applicable and not specific enough for this CTS change. Provide a new DOC and revise the submittal.

FLOG Response:

3.7.4.-9 (CPSES)

CTS 3.7.1.7 LCO Statement
ITS 3.7.4 LCO Statement, BASES-LCO
DOC 06-zz-LG

CTS 3.7.1.7 states that the ARV and "associated remote manual controls" shall be OPERABLE." This CTS requirement has been moved to the ITS 3.7.4 Bases LCO discussion.

Comment: This CTS change is not specifically discussed in DOC 06-03-M. This is the movement of CTS requirement which is a less restrictive generic movement or "LG" change. DOC 06-01-LG is a similar justification which was not used for CPSES. Revise the submittal to provide a DOC and revise the CTS markup for this missing "LG" change.

FLOG Response:

3.7.5 Auxiliary Feedwater System (AFW)

3.7.5.-1 (CPSES)

CTS 3.7.1.2, Applicability
ITS 3.7.5, Applicability or Actions A, B, & C
DOC 02-20-LS35
DOC 06-10-A
JFD 3.7-04

CTS 3.7.1.2 Applicability is Mode 1, 2 and 3. ITS 3.7.5 Applicability is Mode 1, 2 and 3.

Comment: Issue #1 - CPSES has not adopted the STS Applicability extending into Mode 4 until the "steam generator is no longer relied upon for heat removal"; however, CTS 3.7.1.7 Actions a and b requires the RCS/RHR loops be placed in operation for Mode 4 entry. ITS 3.7.5 Applicability should be the same as the STS because (as stated in DOC 06-10-A) ITS 3.4.6 permits any combination of RCS/RHR loops in Mode 4. These CTS requirements for RCS/RHR loop operation directly imply the STS Applicability is due to the RCS/RHR transition temperature being at or below the Mode 4 350°F temperature limits. Explain these differences or adopt the STS. **Issue #2** - Correspondingly due to Issue #1, the ITS markup is incorrect, as presented, because MODES 1, 2, and 3 should be deleted from the Condition statements of Actions B, C, and D. Provide a revised JFD or adopt the STS text. **Issue #3** - This STS permits a total 18 hour Completion Time, for entry into Mode 4, when the Applicability of the LCO has been extended to cover the extra time spent in Mode 4, while the steam generator is relied upon for heat removal. Therefore, CPSES should adopt the STS Applicability or retain the current licensing basis of 12 hours total time. JFD 3.7-04 does not discuss the technical basis for receiving the extra 6 hours of Completion Time. Provide a new DOC because the DOC referenced is not applicable and not specific enough for this CTS change. **Issue #4** - JFD B-PS or 3.7-04 does not specifically explain the deletion of the STS 3.7.5 LCO Note. Revise this JFD or provide a new DOC to adopt the STS text. **Issue #5** - JFD 3.7-04 does not specifically explain the deletion of ITS Action E. Revise this JFD or provide a new DOC to adopt the STS text. **Issue #6** - JFD 3.7-04 does not specifically explain the deletion of the note to ITS SR 3.7.5.3 and the ITS SR 3.7.5.4, Note #2. Revise this JFD or provide a new DOC to adopt the STS text. Revise the submittal for these six related issues.

FLOG Response:

3.7.5.-2 (Callaway) (WCGS)	CTS 3.7.1.2 Action (a,c,e, new g); [a,b, new d] ITS 3.7.5 Required Action (C.2) [D.2], and Completion Times DOC 02-20-LS35 JFD 3.7-04

If CTS 3.7.1.2 Actions are not met, then it is required to enter Mode 3 in 6 hours and enter Mode 4 in an additional 6 hours. ITS 3.7.4 permits an additional 12 hours for entry to Mode 4 if the Required Action and associated Completion Times are not met or two AFW trains are inoperable.

Comment: Issue #1 - The STS permits a total 18 hour Completion Time for entry into Mode 4, when the Applicability of the LCO has been extended to cover the extra time spent in Mode 4, while the steam generator is relied upon for heat removal. Callaway and WCGS have elected not to adopt the revised STS Applicability, so the current licensing basis of 12 hours total time must be retained. It is presumed that the RCS/RHR transition temperature is above or at the Mode 4 350°F temperature limits. JFD 3.7-04 does not discuss the technical basis for receiving the extra 6 hours of Completion Time. Provide a new DOC because the DOC 02-20-LS35 referenced is not applicable and not specific enough for this CTS change. **Issue #2** - JFD 3.7-04 does not specifically explain the deletion of the STS 3.7.5 LCO Note. Revise this JFD or provide a new DOC to adopt the STS text. **Issue #3** - JFD 3.7-04 does not specifically explain the deletion of STS Action E. Revise this JFD or provide a new DOC to adopt the STS text. **Issue #4** - JFD 3.7-04 does not specifically explain the deletion of the note to STS SR 3.7.5.3 and the STS SR.3.7.5.4, Note #2. Revise this JFD or provide a new DOC to adopt the STS text. Revise the submittal for these four related issues.

FLOG Response:

3.7.5.-3 (Callaway)	CTS 3.7.1.2 Action c ITS 3.7.5 Action B DOC 02-03-M JFD 3.7-20

CTS 3.7.1.2 Action c has been modified to extend the Completion Times for one inoperable ESW flowpath to the TDAFW pump for "up to 10 days from discovery of failure to meet the requirements of the LCO." ITS 3.7.5 Action B contains this new requirement.

Comment: The STS Completion Time requirements are in brackets which means the requirements must be justified to determine if they are applicable or not. Callaway should explain in detail how the CTS or ITS permit "multiple overlapping Action entries such that the AOT is exceeded," as is discussed in the DOC. Provide explicit operational examples for this LCO. In addition, explain which Action of the LCO relates directly to the respective Actions A, B and C of the Example 1.3-3. Explicitly state how and why the new Completion Time extensions are developed and why they are appropriate. Also, provide additional explanations of how it was determined that this is more restrictive.

FLOG Response:

3.7.5.-4 (Callaway)
(WCGS)

CTS 3.7.1.2 Action b and c, (*) footnote
ITS 3.7.5 Action B
DOC 02-19-LG
JFD 3.7-20

CTS 3.7.1.2 has an (*) footnote which states "One train of Essential Service Water inoperable will result in entering Action statements b and c, concurrently." This CTS Operability requirement was moved to the Bases LCO discussion.

Comment: Issue #1 - For Callaway, the movement of this Operability requirement to the Bases is not discussed in this DOC. Revise this DOC to include specific justification for this CTS change. **Issue #2** - For WCGS, this same Operability requirement is stated in the last two sentences of the second paragraph of the Bases LCO discussion. Therefore, it appears that WCGS should have the same ITS Action B as Callaway. Provide a new DOC with appropriate technical justification for this new action.

FLOG Response:

3.7.5.-5 (CPSES)

CTS 3.7.1.2 LCO and Actions
ITS 3.7.5 LCO, Actions and Bases
DOC 02-01-LG

CTS 3.7.1.2 requires "At least three independent steam generator auxiliary feedwater pumps and associated flow paths shall be OPERABLE with:" ITS 3.7.5 requires "Three AFW trains shall be OPERABLE."

Comment: The CTS markup should show the LCO statement as follows "~~At least~~ three ~~independent steam generator~~ auxiliary feedwater trains ~~pumps and associated flow paths~~ shall be OPERABLE ~~with:~~" Also, in all Actions and Surveillance Requirements "pumps" should be "trains" and "the associated flow paths" are moved to the Bases. Revise the CTS markup and the submittal.

FLOG Response:

3.7.5.-6 (CPSES)
(Callaway)
(WCGS)

CTS 4.7.1.2, Action a[b].1 and 2
ITS SR 3.7.5.1
DOC 2-07-M
JFD 3.7-08

CTS 4.7.1.2, Action a[b].1 verifies each non-automatic valve and Action a[b].2 verifies each automatic valve is in its correct position. ITS SR 3.7.5.1 collectively verifies each manual,

power-operated and automatic valve is in its correct position with a new note excepting certain valves.

Comment: Issue #1 - Contrary to DOC 02-07-M, these CTS requirements have always applied to automatic valves. Therefore, this is not a more restrictive change but an administrative reformatting change to combine separate surveillances into one ITS SR. Provide a DOC with the appropriate justification for this CTS administrative change.
Issue #2 - The Note to this ITS is taken from the CTS but it is superfluous because the CTS and ITS requirements both are to verify each valve is in its correct position, regardless if the unit is in Mode 1, 2, or 3. If the unit is still in Mode 2 or 3, the AFW flow control is in its correct position if it is closed. In Mode 1, the valve should be open. These are procedural details of how and when this SR is performed. This ITS Note should be deleted and these details moved to and explained in depth in the SR Bases. For WCGS only, the CTS markup does not explain the conversion basis for 4.7.1.2.1 b.2. Provide a DOC with the appropriate justification for this CTS change. Revise the submittal for these two issues.

FLOG Response:

3.7.5.-7	**(CPSES)**	CTS 4.7.1.2
	(Callaway)	Bases ITS 3.7.5, LCO discussion
	(WCGS)	DOC 06-06-LG

For Callaway and WCGS, there is no CTS requirement but the Bases ITS 3.7.5 LCO discussion states the Operability requirements for the TDAFW pump control valve and the ARV[ASD]'s nitrogen accumulator tank pressure. For CPSES, CTS 4.7.1.7 item a, is a surveillance on the accumulator tank air pressure for the ARVs.

Comment: This comment is related to item #8 of ITS 3.7.4. There is no CTS DOC or ITS JFD provided to explain these Operability requirements listed in the Bases for ITS 3.7.5. An explanation is required to explain why there is no surveillance for the TDAFW pump control valve or ARV[ASD] nitrogen accumulator tank pressure. Revise the submittal to add this new SR performed every 24 hours to either ITS 3.7.4 or ITS 3.7.5, as is similarly done at DCPP.

FLOG Response:

3.7.5.-8	**(DCPP)**	CTS 4.7.1.2.1.c
	(CPSES)	ITS SRs 3.7.5.3 and 3.7.5.4
		DOC 02-12-TR1

CTS 4.7.1.2.1.c verifies at least once per 18 months that each AFW pump starts and each automatic valve actuates as designed upon receipt of a AFW actuation test signal. This SR was divided into two ITS SRs, 3.7.5.3 and 3.7.5.4, except an actual signal may be substituted for the simulated signal.

Comment: Issue #1 - The DOC states that the specific identity of the simulated signal, is no longer retained in the SR but it is to be moved to the Bases. A review of the ITS Bases discussion for these SRs shows they do not identify these testing details. Revise the Bases in accordance with the DOC. **Issue #2** - For DCPP, the CTS Markup has been revised from a Frequency of 18 months to at each refueling interval. ITS SRs state the Frequency is 24 months. The ITS Bases state the Frequency is 24 months which is not consistent with the CTS markup. These changes have been proposed without any DOC or JFD. There is no technical justification provided for these CTS changes. Adopt the STS text or withdraw these CTS changes.

FLOG Response:

3.7.5.-9 CTS 4.7.1.2.1.c[1]
ITS SR 3.7.5.3
DOC 02-xx-LSx

CTS 4.7.1.2.1 item c[1] verifies all automatic valves actuate to their correct [full open] position. ITS SR 3.7.5.3 verifies only those valves "that are not locked, sealed or otherwise secured in position .."

Comment: This CTS change was made to the ITS markup but there was no DOC provided to justify this less restrictive technical CTS change for verifying a reduced number of valves. Provide the missing DOC and revise the submittal.

FLOG Response:

3.7.5.-10 (DCPP)
(CPSES)

CTS 3.7.1.2 and CTS 3.7.1.3 Action a
STS SR 3.7.5.5
DOC 02-yy-A
JFD B-PS

For DCPP, CTS 3.7.1.3 Action a, requires the Condensate Storage Tank flowpath open to the AFW pump suction. STS SR 3.7.5.5 verifies the required CST flowpaths to each steam generator are properly aligned. For CPSES, there is no CST flow path verified and hence there is no DOC, JFD, or Bases discussion provided.

Comment: For DCPP, ITS SR 3.7.5.5 was not adopted when there appear to be CTS requirements to ensure AFW flowpaths are properly aligned. The ITS 3.7.5 Bases LCO discussion in the first sentence of the third paragraph states the need to "assure" the CTS outlet valve is open. If this verification does not occur in ITS SR 3.7.5.1, retain the STS SR 3.7.5.5. If this verification does occur in ITS SR 3.7.5.1, modify ITS SR 3.7.5.1 and the Bases to include this specific component verification. The partial plant specific justification/reason provided as the third paragraph of ITS Bases SR 3.7.5.6 should be moved back to SR 3.7.5.5

or adopt the STS text. For CPSES, provide a DOC or JFD, as appropriate to justify how the CTS is affected by adopting the STS SR 3.7.5.5 text. Revise the submittal for these issues.

FLOG Response:

3.7.5.-11 (DCPP)

CTS 3.7.1.3 Action a and b
ITS 3.7.5 Action F, G and H and associated Bases
DOC 03-01-LG
JFD 3.7-09

CTS 3.7.1.3 Action a and b provide actions to ensure the flow paths from the CST and RWST are restored Operable. These requirements have been retained as ITS 3.7.5 Action F and G.

Comment: The new ITS Action F and G are acceptable; however, due to considerations for multiple condition entry Action H cannot be entered unless one or more AFW trains are Operable to avoid a shutdown while in a Condition D situation. The Bases to ITS 3.7.5 Action G imply a natural circulation cooldown is routine. Is this the intent? Modify Condition H to additionally state entry is permitted if there are one or more AFW trains Operable (and aligned to an Operable AFW water source). Also, the Bases must be corrected to ensure these changes are implemented and the requirements of Action D take precedence.

FLOG Response:

3.7.5.-12 (DCPP)

CTS 4.7.1.2.1.a.3
ITS SR 3.7.5.1 and Bases LCO/SR 3.7.5.1 discussion
DOC 02-zz-LG

CTS 4.7.1.2.1.a.3 has been modified to add the STS bracketed verification of both steam supply flow paths to the TDAFW pump per ITS SR 3.7.5.1.

Comment: The ITS Bases LCO discussion in the fourth sentence state the need to "assure" the Operability of various listed steam supply line components. If this verification does not occur in SR 3.7.5.1, provide a new ITS SR. If this verification does occur in SR 3.7.5.1, modify ITS SR 3.7.5.1 and the associated Bases to include these component verifications in this SR.

FLOG Response:

3.7.6 Condensate Storage Tanks (CSTs); [Fire Water Storage Tank (FWST)]

3.7.6.-1 (WCGS) CTS 3/4.7.1.3
ITS 3.7.6
DOC 03-xx-A

CTS 3/4.7.1.3 specifies a "contained water volume" and similarly, the ITS 3.7.9 requires a "contained water volume".

Comment: This ITS change is acceptable as proposed; however, the CTS markup shows the "CST level" is used rather than a "contained water volume". Also, there is no DOC or explanation for this change. Provide a revised DOC, JFD, or CTS markup with the appropriate explanations and justifications.

FLOG Response:

3.7.6.-2 (CPSES)
(Callaway)
(Wolf Creek)
CTS 3.7.1.3 Action a
ITS 3.7.6 Action A
DOC 03-yy-LSy

CTS 3.7.1.3 Action a explicitly requires the CST restored Operable in 4 hours or verify an Operable ESW [SSWS] as a backup water supply in 7 days. These Actions and Completion Times have been reversed in the ITS 3.7.6 Actions.

Comment: ITS 3.7.6 is acceptable as proposed; however, the CTS Actions have been extensively reformatted and changed without the CTS markup indicating and providing a technical justification for these CTS changed requirements. CPSES has provided no CTS markup of this Action to indicate changes and WCGS is the nearest to identifying changes but is without an explanation. Provide a revised DOC, JFD, or CTS markup with the appropriate explanations and justifications.

FLOG Response:

3.7.6.-3 (CPSES) CTS 4.7.1.3.1 and 4.7.1.3.2
ITS 3.7.6 Required Action A.1
DOC 03-03-LG

CTS 4.7.1.3.1 and 4.7.1.3.2 each contain details for when and how to verify the Operability of the CST level and the backup SSWS. These details are moved to the ITS Bases.

Comment: It is acceptable that the verification for the 4.7.1.3.2 details is moved to the ITS Bases discussion of Background. However, the CTS markup of 4.7.1.3.1 does not show the text moved to the Bases and does not indicate the DOC for this CTS change. Revise the CTS

markup. Also, DOC 03-03-LG is incorrect because the verification by "administrative means" is added to the Required Action A.1 and not the surveillance as the CTS markup shows and is described in the DOC. Revise the CTS markup and DOC to correctly explain and justify this CTS change.

FLOG Response:

3.7.6.-4 (Callaway) (WCGS)

CTS 3.7.1.3 Action a and b
ITS 3.7.6 Required Action B.2
DOC 02-20-LS35
JFD 3.7-04

If CTS 3.7.1.3 Actions are not met, then it is required to enter Mode 3 in 6 hours and enter Mode 4 in an additional 6 hours. ITS 3.7.6 permits an additional 12 hours for entry to Mode 4 if the Required Action and associated Completion Times are not met.

Comment: The STS permits a total 18 hour Completion Time, for entry into Mode 4, when the Applicability of the LCO has been extended to cover the extra time spent in Mode 4, while the steam generator is relied upon for heat removal. Callaway and WCGS have elected not to adopt the revised STS Applicability, so the current licensing basis of 12 hours total time must be retained. It is presumed that the RCS/RHR transition temperature is above or at the Mode 4 350°F temperature limits. JFD 3.7-04 does not discuss the technical basis for receiving the extra 6 hours of Completion Time. Provide a new DOC because the DOC 02-20-LS35 referenced is not applicable and not specific enough for this CTS change. Revise this JFD or provide new DOCs to adopt the STS.

FLOG Response:

3.7.6.-5 (CPSES)

CTS 3.7.1.3, Applicability, Action a and b
ITS 3.7.6, Applicability, Required Action B.2, and Completion Time
DOC 02-20-LS35
JFD 3.7-04

If the CST level is not within limits and is not restored Operable, CTS 3.7.1.3 Actions requires Mode 3 entry in 6 hours and entry into Mode 4 in an additional 6 hours. ITS 3.7.6 permits an additional 12 hours for entry to Mode 4.

Comment: Issue #1 - CPSES has not adopted the STS Applicability extending into Mode 4 until the "steam generator is no longer relied upon for heat removal". As previously noted, CTS 3.7.1.7 Action a and b both require the RCS/RHR loops to be placed in operation which directly implies the STS Applicability is a CTS requirement (perhaps due to the transition temperature being below the Mode 4 limits). Adopt the STS Applicability. **Issue #2** - This STS permitted total 18 hour Completion Time, for entry into Mode 4, is only for when the Applicability of the

LCO has been extended to cover the extra time spent in Mode 4, while the steam generator is relied upon for heat removal. Therefore, CPSES should adopt the revised STS Applicability or retain the current licensing basis of 12 hours total time. JFD 3.7-04 does not discuss the technical basis for receiving the extra 6 hours of Completion Time. DOC 02-20-LS35 is not applicable and not specific enough for this CTS change. Provide a revised JFD and DOC as appropriate for this CTS change.

FLOG Response:

3.7.6.-6 (Callaway)

CTS 4.7.1.3.1 and 4.7.1.3.2
ITS 3.7.6 Required Action A.1 and A.2
DOC 03-02-LS22

CTS 4.7.1.3.1 and 4.7.1.3.2 each contain details for when and how to verify the Operability of the CST level and the backup ESW.

Comment: The CTS markup of 4.7.1.3.2 does not show the text is deleted as the DOC states. Revise the CTS markup. Also, the DOC does not match the CTS markup because the verification by "administrative means" is added to the Required Action A.1 and not the surveillance as the CTS markup shows. Revise the CTS markup and DOC to correctly explain and justify this CTS change.

FLOG Response:

3.7.6.-7 (DCPP)

CTS 3.7.1.3 Action a
ITS 3.7.6 Required Action A.1 and Completion Time
JFD 3.7-10

The CTS requirements have been adapted to the ITS format which necessitates the deletion of Required Action A.1 and the 12 hour periodic verification.

Comment: These ITS changes appear to be acceptable; however, the JFD 3.7-10 describes the change but does not specifically describe the deletions of Required Action A.1 and the 12 hour periodic verification. Also, there are no technical justifications provided for these deviations from the STS. Provide the required justifications and the deletion descriptions.

FLOG Response:

3.7.7 [Vital] Component Cooling System (CCW)

3.7.7.-1 (Callaway) (WCGS)

CTS 4.7.3.a and c
Licensee Controlled Documents
DOC 08-01-LG

CTS 4.7.3.a and c require an ANALOG CHANNEL OPERATIONAL TEST and a CHANNEL CALIBRATION on the surge tank level and flow instrumentation, respectively, which have not been retained in ITS 3.7.7 but are proposed to be relocated to Licensee Controlled Documents.

Comment: There is no technical basis provided to justify the relocation of these CTS requirements. The general "LG" NSHC is inadequate: Revise the submittal to provide this information.

FLOG Response:

3.7.7.-2

CTS 4.7.3.[1].b
ITS SR 3.7.7.2
DOC 08-05-A

CTS 4.7.3.[1].b requires that each automatic valve is verified to actuate to its correct position. Corresponding ITS SR 3.7.7.2 limits this verification by excepting those valves that are "locked, sealed or otherwise secured in position."

Comment: This CTS change is acceptable; however, this results in fewer valves that need this verification which is a "less restrictive" change. In addition, for CPSES, the (***) footnote in the CTS markup has omitted the beginning phrase "in the flow path." Revise the submittal to provide the appropriate justification for the proposed change.

FLOG Response:

3.7.7.-3 (Callaway) (WCGS)

CTS 4.7.3.b.1
Bases for ITS SR 3.7.7.2
DOC 08-xx-LG

CTS 4.7.3.b.1 requires each automatic valve defined as "servicing safety-related equipment or isolating the non-nuclear safety related portion of the system" to be verified to actuate to its correct position. The CTS implies this text is deleted; whereas, the definition for which of these valves are verified, is actually moved to the Bases for ITS 3.7.7.2.

Comment: It is acceptable to move these details of the surveillance to the Bases. There is no DOC provided for this CTS change. Provide the appropriate technical justification for this CTS change.

FLOG Response:

3.7.7.-4 (CPSES)
(DCPP)

CTS 4.7.3.[1].b
ITS SRs 3.7.7.2 and 3.7.7.3
DOC 08-06-TR1

CTS 4.7.3.[1].b verifies at least once per 18 months that each CCW automatic valve [and pump] actuates as designed upon receipt of its [associated ESF], Safety Injection or [Phase "B" Isolation] test signal. ITS SR 3.7.7.2 and ITS SR 3.7.7.3 [new for DCPP] verify the automatic CCW valves and the CCW pumps actuate on an "actual signal or a simulated signal."

Comment: The DOC states the specific identity of the simulated signal is no longer retained in the SR but is moved to the Bases. A review of the ITS SRs 3.7.7.2 and 3.7.7.3 Bases discussion shows these signals are not identified there. Revise the Bases accordingly per the DOC.

FLOG Response:

3.7.7.-5 (DCPP)

CTS 4.7.3.1
ITS SRs 3.7.7.2 and 3.7.7.3
DOC 08-07-M

CTS 4.7.3.1.b requires each automatic CCW valve to be actuated once per 18 months. Also, the CTS has been modified to add a new requirement to verify each pump starts automatically at least once per 18 months. The CTS markup has been further changed to "each refueling interval" from the "once per 18 months." ITS SR 3.7.7.2 and SR 3.7.7.3 Frequency is 24 months.

Comment: The Bases for SR 3.7.7.2 and SR 3.7.7.3 state the Frequency is 24 months which is not consistent with the CTS markup. These changes have been proposed without any DOC or JFD. There is no technical justification provided for these CTS changes. Adopt the STS text or withdraw these CTS changes.

FLOG Response:

3.7.7.-6 (DCPP)

CTS 3/4.7.3
ITS 3.7.7 Action A
DOC 08-yy-LSy

ITS 3.7.7 Bases discussion of LCO and Action A.1, states "Split loop alignment of the CCW during normal operation requires Condition A to be entered because the CCW system cannot tolerate a single failure in this configuration."

Comment: The split loop configuration is not identified in the ITS 3.7.7 and it is not explained at all in the Bases. Provide an additional detailed explanation to enable a technical reviewer to make an independent determination pertaining to how the "split loop configuration" affects the ITS LCO conversion.

FLOG Response:

3.7.8 [Station] [Essential] Service Water System [SSWS][ESW]; [Auxiliary Saltwater (ASW) System]

3.7.8.-1 (CPSES) CTS LCOs 3/4.7.4.1 and 3/4.7.4.2, Applicability, Actions, SRs
ITS 3.7.8 LCO Applicability, Actions, SRs
DOC 09-ww-A

CTS 3/4.7.4.1 and 3/4.7.4.2 are complete LCOs which are combined, changed and converted into ITS 3.7.8.

Comment: Issue #1 - There are no DOCs provided by CPSES in the CTS markup to describe and justify how these two CTS LCOs are converted into the ITS 3.7.8. **Issue #2** - There are no explanations to define how these shared unit systems CTS requirements are retained in the ITS. **Issue #3** - There are no explanations for how the CTS 3/4.7.4.2 Applicability in Modes 5, 6 and Refueling requirements are satisfied in the ITS. **Issue #4** - There are no explanations of how the CTS Actions are adapted to the ITS format. Revise this entire LCO submittal.

FLOG Response:

3.7.8.-2 (CPSES) CTS 3.7.4.1 and 3.7.4.2 Applicabilities and Bases
ITS 3.7.8 Applicability and Bases
JFD 3.7-30

CTS 3/4.7.4.1 Applicability is Modes 1, 2, 3 and 4. CTS 3/4.7.4.2 Applicability is Mode 5, 6, and Defueled. ITS 3.7.8 Applicability is Mode 1, 2, 3 and 4.

Comment: The submittal has contradictory Applicability requirements. The Bases have not been modified to explain the changes and/or the requirements. It appears the ITS Applicability should be "Both units in Modes 1, 2, 3, and 4"; (next line) "When one unit is in Modes 1, 2, 3, and 4 and the opposite is in Mode 5, 6 or Defueled". Revise the submittal.

FLOG Response:

3.7.8.-3 (CPSES)

CTS 3.7.4.1 and 3.7.4.2 Actions and Bases
ITS 3.7.8 Actions and Bases
JFD 3.7-30

CTS 3/4.7.4.1 and 3/4.7.4.2 are complete and different LCOs with separate Actions which are now combined, changed and converted into ITS 3.7.8 Actions.

Comment: Issue #1 - The Bases Background and LCO discussions contain descriptions which appear to permit SSWS operating configurations that were never intended. There is nothing to prevent two inoperable SSWS trains in one unit being cross-tied to two Operable SSWS trains in the opposite unit. Therefore, a preventive condition should be logically connected by an OR to ITS Condition C stating "Two trains are inoperable in one unit and two trains are Operable in the opposite unit with the associated cross-connects Operable". **Issue #2** - ITS Action B should be placed ahead of ITS Action A due to the length of the Completion Times and ITS 3.7.8 Action B should be split into two separate Actions. **Issue #3** - By this ITS being a shared unit LCO (with no further prevents), "Separate condition entry" is implied. Therefore, a SSWS train could be assumed to be inoperable in each unit plus either the associated cross-connects or the required pump, or both, could be inoperable. Should this Condition still permit 72 hours or warrant a shorter Completion Time of 24 hours or be directed to an immediate LCO 3.0.3. CPSES should explain the technical basis for risking continued operation in this configuration. **Issue #4** - The Bases LCO discussion has two final paragraphs which are two new degraded operating conditions with required actions for continued operation. These Bases appear to contradict other statements in the Bases and they may not meet the Standard Review Plan requirements. These "Bases Conditions" must be formally included into the LCO following a technical review or otherwise resolved. CPSES should explain the technical basis for risking continued operation in these configurations.

Note: Issues #1 and #3 can also be limited by putting in an Actions note which specifically states "The Conditions and Required Actions apply simultaneously to both units."

FLOG Response:

3.7.8.-4 (CPSES)

CTS 4.7.4.1.1.a and CTS 4.7.4.2.1
ITS SR 3.7.8.2 and ITS Bases Background
DOC 09-yy-LSy
JFD 3.7-31

CTS 4.7.4.1.1.a and CTS 4.7.4.2.1 verify that each "manual, power operated or automatic" valve is in its correct position. ITS SR 3.7.8.2 requires the verification in accordance with Section XI but only of the cross connect valves.

Comment: Issue #1 - The Bases Background discussion, second paragraph, third sentence states that there are remotely aligned valves in the SSWS which seems to agree with the CTS 4.7.4.1.1.a. The Bases, the CTS and the ITS are in contradiction. The STS SR 3.7.8.2 which verifies the automatic valves of CTS 4.7.4.1.1.a every 18 months has not been adopted. Also,

there are no CTS DOCs for these CTS changes. Provide sufficient information and explanations to resolve these discrepancies. **Issue #2** - The ITS SR 3.7.8.2 has not adopted the phrase "in the flow path" which is a part of CTS 4.7.4.1.1.a requirements. Revise the ITS SR to retain this CTS requirement. **Issue #3** - The JFD 3.7-31 states this change is more restrictive than the STS and is consistent with NRC Generic Letter 91-13 but there is no technical discussion provided to make this same determination. Revise the submittal to remove these contradictions and provide the missing technical justification for these changes.

FLOG Response:

3.7.8.-5 (CPSES)

CTS 4.7.4.1.1.b
ITS SRs 3.7.8.2 and 3.7.8.3
DOC 09-05-TR1

CTS 4.7.4.1.1.b verifies at least once per 18 months that each SSWS pump actuates as designed upon receipt of a Safety Injection test signal. ITS SR 3.7.8.2 and ITS SR 3.7.8.3 verify the automatic SSWS valves and the SSWS pumps actuate on an actual signal or a simulated signal.

Comment: The DOC states the specific identity of the simulated signal is no longer retained in the SR but is moved to the Bases. A review of the ITS SRs 3.7.8.2 and 3.7.8.3 Bases discussion shows this is not identified there. Revise the Bases accordingly per the DOC.

FLOG Response:

3.7.8.-6 (DCPP)

CTS 4.7.4.1
ITS SR 3.7.8.1
DOC 09-03-A
DOC 08-08-A

CTS 4.7.4.1 verifies that each "manual, power operated or automatic" valve is in its correct position. ITS SR 3.7.8.1 requires the verification of only manual or power operated valves.

Comment: Resolve the contradiction and make the CTS and the ITS consistent. Also, the CTS has been modified to add "in the flow path" to this CTS SR. There is no CTS DOC indicated on the CTS markup for this CTS change while DOC 08-08-A has been used elsewhere. Revise the submittal to remove these contradictions and provide the missing technical justification for these changes.

FLOG Response:

3.7.8.-7 (DCPP)

CTS 4.7.4.1
ITS SR 3.7.8.1
DOC 09-01-M
JFD 3.7-15

These changes are beyond the scope of a conversion because they have not been approved by the NRC.

Comment: Withdraw the changes or adopt the STS.

FLOG Response:

3.7.8.-8 (DCPP)

CTS 4.7.4.1
ITS SR 3.7.8.3
DOC 09-04-M

CTS 4.7.4.1 has been modified by ITS SR 3.7.8.3 which is a new requirement to verify each pump starts automatically at least once per 18 months.

Comment: ITS 3.7.8.3 and the Bases state the Frequency is 24 months which is not consistent with the CTS markup. These changes have been proposed without any DOC or JFD. There is no technical justification provided for these CTS changes. Adopt the STS text or withdraw these CTS changes.

FLOG Response:

3.7.8.-9 (DCPP)

CTS 4.7.4.1
ITS SR 3.7.8.1
JFD 3.7-14

ITS SR 3.7.8.1 has not adopted the STS note which states "Isolation of [ASW] SWS flow to individual components does not render the SWS inoperable."

Comment: Per JFD 3.7-14, the ASW is dedicated to CCW and no valve realignments are required with a safety injection signal. Therefore, it is acceptable to not retain the STS note. However, the Bases Background discussion, first paragraph, second sentence states that ASW is directed to various non-safety related sources. DCPP is requested to provide an explanation for this contradiction.

FLOG Response:

3.7.8.-10 (DCPP) CTS 3/4.7.4.1
ITS 3.7.8 Bases
DOC 09-zz-A

The ITS Bases provide additional discussion over what is contained in the CTS Bases.

Comment: Issue #1 - The Bases Background discussion in the last four sentences of the second paragraph and LCO discussion item b, describe capability to support the opposite unit. DCPP shall state explicitly that this LCO is not submitted for a shared unit LCO system operation. Also, state that the two Operable ASW trains are kept separated from the other unit for operation in accordance with this LCO. **Issue #2** - LCO bases discussion of item b states that the ASW train components to be Operable need only be "... capable of performing their intended safety function". This changes the meaning of "Operable". Explain the technical basis for this rewording of the STS text requirements. **Issue #3** - In the Applicable Safety Analysis, second paragraph, the last sentence has not been adopted. It states "One SWS train is sufficient to remove decay heat during subsequent operations in Modes 5 and 6." Explain what is different about the DCPP design which requires more than one ASW train.

FLOG Response:

3.7.8.-11 (Callaway) (WCGS) CTS 4.7.4.a and c
Licensee Controlled Documents
DOC 08-01-LG

CTS 4.7.4.a and c require an ANALOG CHANNEL OPERATIONAL TEST and a CHANNEL CALIBRATION on the ESW differential pressure instrumentation, respectively, which have not been retained in ITS 3.7.8 but are proposed to be relocated to Licensee Controlled Documents.

Comment: There is no technical basis provided to justify the relocation of these CTS requirements. The generic "LG" NSHC is inadequate. The identity of the Licensee Controlled Documents is not reported. Revise the submittal to provide this information.

FLOG Response:

3.7.8.-12 (Callaway) (WCGS) CTS 4.7.4.b.1
Bases for ITS SR 3.7.8.2
DOC 09-aa-LG

CTS 4.7.4.b.1 requires each automatic valve defined as "servicing safety-related equipment or isolating the non-nuclear safety related portion of the system" is verified to actuate to its correct position. The CTS implies this text is deleted; whereas, the definition for which of these valves are verified is actually moved to the Bases for ITS 3.7.8.2.

Comment: It is acceptable to move these details of the surveillance to the Bases. However, there is no DOC provided for this CTS change. Provide the appropriate technical justification for this CTS change.

FLOG Response:

3.7.8.-13 (WCGS)

CTS 4.7.4.a
ITS SR 3.7.8.1, Note
DOC 08-04-A

CTS 4.7.4.a has been modified by a Note added to ITS SR 3.7.8.1 that states "Isolation of ESW flow to individual components does not render the ESW system inoperable."

Comment: This change is acceptable, if the DOC used to justify this change is re-identified from 08-04-A to 09-07-A. Revise the CTS markup.

FLOG Response:

3.7.8.-14 (Callaway) (WCGS)

CTS 4.7.4.b.1
ITS SR 3.7.8.2
DOC 08-05-A

CTS 4.7.4.b.1 requires that each automatic valve is verified to actuate to its correct position. Corresponding ITS SR 3.7.8.2 limits this verification by excepting those valves that are "locked, sealed or otherwise secured in position."

Comment: This CTS change is acceptable; however, this results in fewer valves that need this verification which is a "less restrictive" change. Revise the submittal to provide the appropriate justification for the proposed change.

FLOG Response:

3.7.8.-15 (Callaway) (WCGS)

CTS 4.7.4.a and b
ITS SR 3.7.8.1 and SR 3.7.8.2
DOC 08-08-A

CTS 4.7.4.a and b have been modified to further define the position verification as pertaining to each valve "in the flow path" which is correspondingly located in ITS SR 3.7.8.1 and SR 3.7.8.2.

Comment: This CTS change is not identified with a DOC in the CTS markup. This change is acceptable if the DOC used to justify this change is 08-08-A. Revise the CTS markup.

FLOG Response:

3.7.8.-16 (Callaway) CTS 4.7.4.b.1 and 2
ITS SRs 3.7.8.2 and 3.7.8.3
DOC 08-06-TR1

CTS 4.7.4.b.1 and 2 have been modified by moving the specific actuation test signal to the BASES and requiring in ITS SRs 3.7.8.2 and 3.7.8.3 either a "simulated or actual test signal" to actuate the ESW valves and pumps.

Comment: This change is acceptable, if the DOC used to justify this change is re-identified as 09-05-TR1 for consistency within the CTS markup for this LCO. Revise the CTS markup.

FLOG Response:

3.7.8.-17 (Callaway) CTS 3/4.7.4 Actions
Bases ITS 3.7.8, LCO discussion
DOC 09-bb-LSb

CTS 3/4.7.4 Actions have been extensively modified by new Bases ITS 3.7.8 LCO discussion which establish three new conditions for ESW Operability.

Comment: Callaway should explain the technical basis for inclusion of these new items into the Bases LCO discussion. Under paragraph c, items 3.A and 3.B appear to be acceptable clarifications of text to further define ESW system component Operability. However, further information is required for the staff to make this determination. In addition, if item c is valid, it contains Required Actions that should be put into the Actions portion of the LCO rather than buried in the Bases.

FLOG Response:

3.7.9 Ultimate Heat Sink (UHS)

3.7.9.-1 (DCPP) CTS 3/4.7.12
ITS 3.7.9
DOC 13-01-LG

CTS 3/4.7.12 is written as a common LCO to both units shown as the (*) footnote. ITS 3.7.9 only states this fact in the Bases.

Comment: This is a shared system LCO for both units which must be identified in the ITS LCO and not placed in the BASES. The Applicability should be "Any unit in Mode 1, 2, 3, and 4" and the Actions shall have a note inserted which states "Actions apply simultaneously for both units."

FLOG Response:

3.7.9.-2 (DCPP) ITS SRs 3.7.9.1 and 3.7.9.2
DOC 13-ww-A

Comment: The ITS markup does not appear to be a version of NUREG-1431, Rev 1. The ITS SRs 3.7.9.1 and 3.7.9.2 text is acceptable but certain "redline and strike-out" text is not part of the STS. Portions of the STS text are unchanged but they are redlined. Revise the ITS markup.

FLOG Response:

3.7.9.-3 (CPSES) CTS 3/4.7.5 LCO, Actions, and SRs
Licensee Controlled Documents
DOC 13-03-R

CTS 3.7.5 item c, Action b, 4.7.5.b and 4.7.5.c have not been retained in ITS 3.7.9 but have been relocated to Licensee Controlled Documents.

Comment: There is no technical basis provided to justify the relocation of these CTS requirements. The generic "R" NSHC is inadequate. Also, this not an "R" change since the R category is used only for the complete LCO relocations. Revise the submittal to provide this information.

FLOG Response:

3.7.9.-4 (CPSES) CTS 3/4.7.5
ITS 3.7.9
DOC 13-xx-A

CTS 3/4.7.5 is written as a common LCO to both units shown as "ACTION: (Units 1 and 2"). The LCO or the Bases for ITS 3.7.9 does not explicitly state the UHS is a shared system.

Comment: This is a shared system LCO for both units which must be identified in the ITS LCO and not placed in the BASES. The Applicability should be "Any unit in Mode 1, 2, 3, and 4" and the Actions should have a note inserted which states "Actions apply simultaneously for both units."

FLOG Response:

3.7.9.-5 (WCGS) CTS 3.7.5.a and 4.7.5.b
Licensee Controlled Documents
DOC 13-04-LG

Portions of CTS 3.7.5 item a and 4.7.5.b contain crest of the UHS dam requirements that have not been retained in ITS 3.7.9 but have been relocated to Licensee Controlled Documents.

Comment: There is no technical basis provided to justify the relocation of these CTS requirements. The generic "LG" NSHC is inadequate. The identity of the Licensee Controlled Documents is not reported. Revise the submittal to provide this information.

FLOG Response:

3.7.9.-6 (Callaway) CTS 4.7.5.2
Licensee Controlled Documents
DOC 13-06-LG

CTS 4.7.5.2 contains visual inspection requirements of the cooling tower that have not been retained in ITS 3.7.9 but have been relocated to Licensee Controlled Documents.

Comment: There is no technical basis provided to justify the relocation of these CTS requirements. The generic "LG" NSHC is inadequate. The identity of the Licensee Controlled Documents is not reported. Revise the submittal to provide this information.

FLOG Response:

3.7.9.-7 (Callaway) CTS 4.7.5.3
Licensee Controlled Documents
DOC 13-07-LG

CTS 4.7.5.3 contains visual inspection requirements of the UHS riprap which might lead to blockage of the ESW pump suction that have not been retained in ITS 3.7.9 but have been relocated to Licensee Controlled Documents.

Comment: There is no technical basis provided to justify the relocation of these CTS requirements. The generic "LG" NSHC is inadequate. The identity of the Licensee Controlled Documents is not reported. Revise the submittal to provide this information.

FLOG Response:

3.7.9.-8 (Callaway) CTS 3/4.7.5
STS SR 3.7.9.4
DOC 13 yy-LSy

STS SR 3.7.9.4 requires each cooling tower to be verified to start on an actual or simulated signal. The CTS does not contain a similar requirement.

Comment: There is no JFD provided to explain why this SR is not adopted in the ITS 3.7.9. Provide an explanation to justify this deviation from the STS or adopt the STS text.

FLOG Response:

3.7.10 Control Room [Emergency] Ventilation [Filtration/Pressurization] System (CREVS); [CRVS]; [CREFS]

3.7.10.-1 (DCPP) CTS 3.7.5.1, (*) Footnote
ITS 3.7.10 and Bases
DOC 10-13-LG

CTS 3.7.5.1 (*) Footnote states "The CRVS is common to both units". This statement is moved to the ITS 3.7.10 Bases Background discussion.

Comment: For the user of this shared system LCO, this situation must be placed directly into the LCO. Therefore, the Actions must have a note added that states "Actions apply simultaneously to both units." Provide a new DOC or revise the DOC and the CTS markup.as appropriate for retaining this CTS requirement.

FLOG Response:

3.7.10.-2 (DCPP) CTS 3.7.5.1, Action a for Modes 5 and 6
ITS 3.7.10 Action C and Bases for Background
DOC 10-05-LS18

If one CRVS train is inoperable for 7 days, CTS 3.7.5.1, Action a for Modes 5 and 6 requires an option which is to place the Operable train in operation in the recirculation mode. ITS 3.7.10 Required Action C.1 retains this CTS requirement and adds another option per Required Actions C.2.1 and C.2.2 which is to "suspend CORE ALTERATIONS and suspend movement of irradiated fuel assemblies."

Comment: Issue #1 - The addition of the new Required Actions is acceptable; however, the DOC provided contains an inadequate technical justification for this relaxation. The NSHC discussion contains the technical justification required. Therefore, revise this DOC using the NSHC text and provide a revised justification for this CTS change. **Issue #2** - The STS LCO is based upon the assumption that the "emergency mode of operation" of the CRVS is for

protection from the potential toxic gas or radiation release scenarios. At DCPP based upon the Bases Background discussion, it appears the recirculation state does not have the boost from the pressurization system to keep toxic and radiation contamination from leaking inward. Therefore, the STS text should be adopted and the "pressurization" mode of operation rather than the recirculation mode of operation is necessary in Required Action C.1. **Issue #3** - Are there two pressurization systems, one for each CRVS train or is this also shared? Explain the function and design of these systems. **Issue #4** - The Bases uses the CRVS "mode" of operation like the DCPP plant "MODE" of operation. This is confusing. Also, explain why the other "modes of operation" do not have to be considered Operable. Explain what is the "MODE 1" of operation and others, if more.

FLOG Response:

3.7.10.-3 (DCPP) CTS 3.7.5.1, Action b for Modes 5 and 6 and 4.7.5.1.b.2
ITS 3.7.10 Bases for Applicability, Actions and Surveillances
DOC 10-16-LG

CTS 3.7.5.1, Action b for Modes 5 and 6 and 4.7.5.1.b.2 pertain to verification that the remaining CRVS train receives electrical power from a separate Operable vital bus. These requirements have been moved to four places in the ITS 3.7.10 Bases for Applicability, Action A and Action C and the first paragraph of Bases for Surveillances.

Comment: This Operability requirement must be included as a note to the LCO statement rather than repetitively buried in the Bases. Also, 4.7.5.1.b.2 should be retained in the ITS based upon the importance of this surveillance.

FLOG Response:

3.7.10.-4 (Callaway) (DCPP) (WCGS) CTS 3.7.5.1 [3.7.6], Action a and b for Modes 5 and 6
ITS 3.7.10 Actions C and D
DOC 10-xx-M

CTS 3.7.5.1 [3.7.6], Action a and b for Modes 5 and 6 have been modified by ITS 3.7.10 Actions A, B, and C by the addition of an "immediate" Completion Time for both Actions and the addition of suspending the "movement of irradiated fuel assemblies" in Action b.

Comment: These two CTS more restrictive changes were not identified in the CTS markup and no DOCs were provided to justify these changes. Provide the appropriate DOCs for these changes.

FLOG Response:

3.7.10.-5 (DCPP) CTS 3.7.5.1, Action b for Modes 5 and 6
ITS 3.7.10 Action D
DOC 10-21-LS38

CTS 3.7.5.1, Action b for Modes 5 and 6 for two CRVS trains inoperable suspends "all operations involving CORE ALTERATIONS or positive reactivity changes." ITS 3.7.10 contains these requirements in Action D.

Comment: This DOC is confusing because it states the Actions to "suspends all operations involving CORE ALTERATIONS and movement of irradiated fuel assemblies...." are deleted when this is not the case per the CTS and ITS markup. In fact, suspending "movement of irradiated fuel assemblies" is added to the CTS. Explain and provide the correct and appropriate DOCs for these changes.

FLOG Response:

3.7.10.-6 (DCPP) CTS 3.7.5.1, Action b for Modes 5 and 6
ITS 3.7.10 Action D
DOC 10-yy-LG

CTS 3.7.5.1, Action b for Modes 5 and 6 has been modified by ITS 3.7.10 Action D by not retaining the CTS action to suspend "positive reactivity changes."

Comment: This CTS requirement has been moved to the Bases discussion of Action D.1 and D.2. Therefore, this CTS change should be identified on the CTS markup and categorized as an "LG" change. Provide the appropriate DOC for this change.

FLOG Response:

3.7.10.-7 (Callaway) (DCPP) (WCGS) CTS 4.7.5.1.a [4.7.6.a]
ITS, Licensee Controlled Documents
DOC 10-07-LG

CTS 4.7.5.1.a [4.7.6.a] require the control room temperature verified less than 120°F once per 12 hours. This has not been retained in ITS 3.7.8 but is proposed to be relocated to Licensee Controlled Documents.

Comment: There is no technical basis provided to justify the relocation of these CTS requirements. The generic "LG" NSHC is inadequate. The identity of the licensee controlled documents is not reported. Also, for DCPP, the CTS markup incorrectly identifies this change as an "R" CTS change. Revise the submittal to provide these corrections, information and justifications.

FLOG Response:

3.7.10.-8	(Callaway)	CTS 4.7.5.1.b.1 and 3 [4.7.6.b]
	(DCPP)	ITS SR 3.7.10.1
	(WCGS)	DOC 10-06-LG

CTS 4.7.5.1.b.1 and 3 [4.7.6.b] verify at least once per 31 days that each CRVS [CREVS] train operates and each component operates for its specified length of time. ITS SR 3.7.10.1 requires these similar verifications but in less detail.

Comment: Issue #1 (for DCPP and WCGS only) - The DOC states that the specific details which comprise the CTS 4.7.5.1.b.1 and 3 [4.7.6.b] requirements are no longer retained in the SR but are moved to the Bases. A review of the ITS SR 3.7.10.1 Bases discussion shows these details are not there. Revise the Bases accordingly per the DOC. **Issue #2** - The CTS markup of CTS 4.7.5.1.b.1 [4.7.6.b] shows it has not been modified to require that "each train" respectively operates for the specified length of time. The CTS markup still states the "system" operates rather than each "train" which is inconsistent with ITS SR 3.7.10.1. Revise this DOC or provide new DOCs for these changes. **Issue #3** - What are the respective "modes of operation" for these operational tests in ITS SR 3.7.10.1? For Callaway and WCGS, it is assumed to be the CRVS mode. For DCPP, it is assumed to be the pressurization mode of operation since the booster and pressurization supply fans are operating. Provide a detailed explanation and include it in the Bases. **Issue #4 (For DCPP and WCGS)** - The CTS markup of the Action a for Modes 5 and 6 has DOC 10-06-LG identified but it cannot be determined which CTS change this DOC is to justify.

FLOG Response:

3.7.10.-9	CTS 4.7.5.1.c.3; [4.7.6.c.1 and 3]; [4.7.7.1.b.2&3]
	ITS SR 3.7.10.4
	DOC 10-17-A
	DOC [10-15-LG]
	DOC [10-24-A]
	JFD 3.7-33

CTS 4.7.5.1.c.3 [4.7.6.c.1 and 3] [4.7.7.1.b.3] verifies a system flow rate(s) of 2100 [for DCPP, 2000/2200/750 for WCGS, and 2000/500 for Callaway cfm ± 10% at least once per 18 months. This CTS requirement is not retained in ITS 3.7.10.4.

Comment: Issue #1 - ITS SR 3.7.10.4 should state the required flow rate for each train because for the HEPA filter to be effective, the train flow must be within the specified flow rate range of ± 10% and still meet the room pressurization requirement. **Issue #2** - For DCPP, ITS SR 3.7.10.3 has a JFD 3.7-33 that is referenced; however, it is not understood what purpose this JFD has to do with this SR. For all, explain why the makeup flow requirement was not adopted in more detail and/or revise this JFD accordingly.

FLOG Response:

3.7.10.-10 (DCPP) CTS 4.7.5.1.e.1 and 2
ITS SRs 3.7.10.3 and 3.7.10.4
DOC 10-zz-LSz

CTS 4.7.5.1.e.1 and 2 requires each CRVS train to be actuated and pressurization tested once per 18 months. The CTS markup has been further changed to "each refueling interval" from the "once per 18 months." ITS SR 3.7.10.3 and SR 3.7.10.4 Frequency is 24 months.

Comment: The Bases for SR 3.7.10.3 and SR 3.7.10.4 state the Frequency is 24 months which is not consistent with the CTS markup. These changes have been proposed without any DOC or JFD. There is no technical justification provided for these CTS changes. Adopt the STS text or withdraw these CTS changes.

FLOG Response:

3.7.10.-11 (CPSES) CTS 4.7.7.1.j
ITS SR 3.7.10.4
DOC 10-11-LS19

CTS 4.7.7.1.j requires demonstration that each CREFS train can maintain a positive pressure at least once per 18 months. The CTS markup shows this test is conducted once each 36 months on a "staggered test basis". ITS SR 3.7.10.4 requires performance of this test once every 18 months on a "Staggered Test Basis."

Comment: The proposed ITS SR 3.7.10.4 is acceptable; however, the CTS markup is not consistent with the DOC, CTS or ITS requirement. Revise the CTS markup.

FLOG Response:

3.7.10.-12 (DCPP) CTS 3.7.5.1 Action a and b Modes 5 and 6
ITS 3.7.10 Action D and E
JFD 3.7-aa

ITS 3.7.10 Action C and D have the same phrase added to their respective Condition statement which is "...for reasons other than Condition D...".

Comment: There is no JFD to explain or justify these deviations from the STS. The change is circular because Condition D is referenced back to itself and Condition E is the same as Condition D. Remove or correct these proposed deviations from ITS 3.7.10.

FLOG Response:

3.7.10.-13 (Callaway) CTS 3.7.6, Action a for Modes 5 and 6
ITS 3.7.10 Action D and Bases for Background
DOC 10-05-LS18

If one CREVS train is inoperable for 7 days, CTS 3.7.5.1, Action a for Modes 5 and 6 requires an option which is to place the Operable train in operation in the "recirculation" mode. ITS 3.7.10 Required Action C.1 retains this CTS requirement and adds another option per Required Actions C.2.1 and C.2.2 which is to "suspend CORE ALTERATIONS and suspend movement of irradiated fuel assemblies."

Comment: This DOC is also used in the CTS markup for Action b of Modes 5 and 6 which is not correct even though the change is similar. Refer to the above Comment 3.7.10.-4 for the correct designation of this change. Revise this CTS markup.

FLOG Response:

3.7.10.-14 (Callaway) CTS 3.7.6 Action b, Modes 1, 2, 3 & 4;
(DCPP) Action c, Modes 5 & 6
(WCGS) ITS 3.7.10 Action B, C, D, E, and F
DOC 10-20-LS39
JFD 3.7-57

These changes are beyond the scope of a conversion because the industry traveler referenced in this DOC (WOG-86) has not been approved by the NRC.

In addition, for CPSES, the Action D condition statement appears to be contradictory because with two inoperable trains, it is not clear how any pressurization occurs.

Comment: Withdraw the changes or adopt the STS.

FLOG Response:

3.7.10.-15 (Callaway) CTS 3.7.6, Action a for Modes 5 and 6
(WCGS) ITS 3.7.10 Action D and Bases for Background
DOC 10-zz-LSz

If one CREVS train is inoperable for 7 days, CTS 3.7.5.1, Action a for Modes 5 and 6 requires the Operable trains to be in operation in the recirculation mode. ITS 3.7.10 Required Action D.1 retains this CTS requirement but modifies the mode of operation to the CREVS mode of operation.

Comment: ITS 3.7.10 Action D has adopted the STS text; however, this CTS change is not identified on the CTS markup and is not justified with a DOC and technical justification. Provide the appropriate DOC for this CTS change.

FLOG Response:

3.7.10.-16 (Callaway) CTS 4.7.6.b
(WCGS) ITS SR 3.7.10.1
DOC 10-12-LS32

CTS 4.7.6.b verifies at least once per 31 days on a Staggered Test Basis that each CREVS train operates and each component operates for its specified length of time. ITS SR 3.7.10.1 requires these similar verifications every 31 days but not on a Staggered Test Basis.

Comment: This ITS proposed change is acceptable; however there is no technical justification provided in this DOC. Also, this DOC refers to the contents of the NSHC that contains a justification only for Vogtle which is not applicable. Provide a technical justification that is applicable to Callaway and WCGS.

FLOG Response:

3.7.10.-17 (Callaway) CTS 3.7.6 Action b, Modes 5 and 6
(WCGS) ITS 3.7.10 Action E
DOC 10-09-LS27

CTS 3.7.6 Action b, Modes 5 and 6 suspends operations when there are two inoperable trains of CREVS or the remaining Operable train in operation is not capable of being powered by an emergency power source. This latter requirement is not retained in ITS 3.7.10 Action E.

Comment: The DOC contradicts itself by permitting "normal" electrical power to operate the required train. The train in operation must have a safety-related power source per the ITS Operability definition which is not changed from the CTS. The guidance of the STS only shows this CTS requirement may be redundant to the train Operability definitions which are moved to the Bases. Also, for consistency, evaluate this Comment jointly with Comment 3.7.10.-3 for DCPP. Revise this DOC and report on the results of the evaluation.

FLOG Response:

3.7.10.-18 (Callaway) CTS 4.7.5.1.e.2 and 3; [4.7.6.e.2 and 3]
(DCPP) ITS SRs 3.7.10.3 and 3.7.10.4
(WCGS) DOC 10-aa-LSa

CTS 4.7.5.1.e.1 and 2 requires the CRVS [CREVS] system to be actuated and pressurization tested once per 18 months. The ITS SRs 3.7.10.3 and 4 requires that each "train" rather than the "system" be tested.

Comment: Issue #1 - The CTS markup does not match the ITS requirements. A new DOC or a revised DOC must be provided with the revised CTS markup to explain this change in the CTS requirements. **Issue #2 (for Callaway and WCGS)** - CTS 4.7.6.e.2 contains details of how this test is performed which have not been retained in the ITS. It is recommended that these details be moved to the ITS SR 3.7.10.3. **Issue #3 (for Callaway and WCGS)** - In 4.7.6.e.2 and 3, does the automatic mode of operation switch-over occur to "recirculation or CRVIS" modes of operation as presented in ITS SR 3.7.10.3? Both ITS SR 3.7.10.3 and ITS SR 3.7.10.4 should be performed in the CRIVS mode of operation. Correct or revise the ITS and CTS markups for consistency.

FLOG Response:

3.7.10.-19	**(Callaway)**	CTS 3/4.7.6; [CTS 3/4.7.7]
	(CPSES)	ITS 3.7.10 Action D.1 [C.1]
	(WCGS)	JFD 3.7-bb
		JFD B-PS

STS 3.7.10 has a note to Required Action C.1 which states "Place in toxic gas protection mode if automatic transfer to toxic gas protection mode is inoperable." ITS 3.7.10 has not adopted this STS requirement.

Comment: There is no JFD for not retaining this STS requirement. The categorization of "B-PS" does not provide the detailed explanation to enable a reviewer to reach the same determination. Provide a detailed JFD for not adopting the STS text or provide an alternate note.

FLOG Response:

3.7.11 Control Room [Emergency] Air [Temperature Control] Conditioning System (CRACS); [CREATCS]

3.7.11.-1	**(CPSES)**	CTS 3.7.7.2 Actions for two trains inoperable
		ITS 3.7.11 Action D and E
		JFD 3.7-36

When two CRACS trains are inoperable, CTS 3.7.7.2 Actions permit verification of 100% heat removal capability of a single Operable train to exist for continued operation instead of the shutdown or suspension of fuel movement activities. ITS 3.7.11 Action D and E retain these CTS requirements.

Comments: This JFD correctly adds the current licensing basis. However, the Bases for the ITS Actions do not provide adequate explanation of how or what assortment of equipment is made available to ensure this capability exists for the control room. The replacement train must

consist of safety-related components with assured sources of cooling water and vital bus power. Provide a description of why the Completion Times are appropriate especially when the SR to determine heat removal capability consists of testing and calculations. How long does it take to make this determination? Why isn't the suspension of fuel movement activities or entry into a lower mode more acceptable than the risk of continued operation while waiting for this SR to be completed? Is this a shared system for the Control Room(s)?

FLOG Response:

3.7.12 Primary Plant Ventilation System (PPVS)

3.7.12.1-1 (CPSES) CTS 3/4.7.8, Applicability
ITS 3.7.12, Applicability
DOC 12-xx-LSx

CTS 3/4.7.8 has an Applicability of Modes 1, 2, 3 and 4 which is retained in ITS 3.7.12.

Comment: CTS 3.7.8 Actions b and c, and the ITS 3.7.12 Bases Background discussion , first paragraph, first sentence, states "PPVS serves all areas housing ESF equipment as well as the radwaste areas and the fuel handling and storage areas." The fuel handling and storage areas must consider a fuel handling accident and operations which are independent of the reactor modes. The CTS requirement apparently does not consider these situations. Likewise, CPSES has not adopted STS 3.7.13 for the comparable fuel [handling] building air cleanup systems. CPSES must assure the PPVS Operability during "Modes 5 and 6" and "During the movement of irradiated fuel assemblies" based upon the stated function of PPVS. Provide a new DOC, revised CTS markup and the appropriate technical justifications for these CTS changes.

FLOG Response:

3.7.12.1.-2 (CPSES) CTS 3/4.7.8, LCO
ITS 3.7.12, LCO
DOC 12-yy-LSy

CTS 3/4.7.8 and ITS 3.7.12 LCOs outwardly appear to govern each PPVS system as comprised of two trains separated from each unit. The ITS 3.7.12 Bases Background discussion (third paragraph, last sentence) and the Bases discussion for the ITS Action disclose the shared system operational use.

Comment: The CTS and ITS must be modified to account for the on-going shared system functioning of this LCO. Though not reflected in the CTS, each of the four ESF filter trains are required Operable to meet the various design assumptions and configurations permitted for ensuring the PPVS has the required negative pressure maintained in the envelop comprised of

three buildings. Revise the ITS to add the Action Note that states "Actions apply simultaneously for both units."

FLOG Response:

3.7.12.1.-3 (CPSES) CTS 3/4.7.8
ITS 3.7.12 Actions A, B, C
DOC 12-xx-A

The ITS 3.7.12 Actions A, B, and C reproduce respectively the CTS 3.7.8 Action a, b, and c.

Comment: Issue #1 - The formatting and arrangement of the ITS Actions does not follow STS guidelines. Action C should be first, followed by Action A and B. **Issue #2** - Accordingly, the current ITS Action A Condition does not need to restate the exception but merely only state "... for any reason except Condition(s)...". **Issue #3** - Bases Discussion for A.1 contains a second paragraph which appears to be directly related to Action B rather than Action A. This is because Action A inoperability is for reasons other than loss of negative pressure requirements. Move this paragraph to Action B where it belongs. **Issue #4** - Condition B as justified in the Bases (see relocated paragraph of A.1) assumes that there is a minimum flow rate which is never verified as being in existence. Required Action B.1 should become B.2 and the new B.1.1 should state "Verify supply/exhaust flow rate differential is $\geq$ 15,000 cfm" with a Completion Time of 4 hours AND Once per 12 hours thereafter". Also, the justification for the 7 day Completion Time is marginal. It is compared to the 72 hours allowed for ECCS when that Condition has at least one redundant Operable train to mitigate any accident. There can be up to four ESF filtration trains inoperable which is a Loss of Function that is permitted longer than any other STS comparable requirement. What does the SE for this CTS amendment state? Provide a more in-depth justification for this Action. **Issue #5** - Condition C as justified in the Bases (see first paragraph, second sentence) assumes that there is a minimum negative pressure maintained which is never verified as being in existence. Required Action C.1 should become C.2 and the new C.1.1 should state "Verify a negative pressure of 0.01 water gauge is maintained" with a Completion Time of 4 hours AND Once per 12 hours thereafter". Revise the CTS markup and provide the necessary JFDs as appropriate for these changes to the submittal.

FLOG Response:

3.7.12.1.-4 (CPSES) CTS 4.7.8.a
ITS SR 3.7.12.1
DOC 12-05-LS32

CTS 4.7.8.a verifies at least once per 31 days on a Staggered Test Basis that each PPVS train operates and each heater/components operate for its specified length of time. ITS SR 3.7.12.1 requires these similar verifications every 31 days but not on a Staggered Test Basis.

Comment: Issue #1 - This ITS proposed change is acceptable; however there is no technical justification provided in this DOC. Also, the contents of the NSHC contain a justification only for Vogtle which is not applicable. Provide a technical justification that is applicable to CPSES. **Issue #2** - The CTS markup shows this DOC is an "A" change which is incorrect. Revise the CTS markup.

FLOG Response:

3.7.12.1.-5 (CPSES)

CTS 4.7.8.d.1
ITS 3.7.12.4?
DOC 12-ww-LSw
JFD 3.7-38

CTS 4.7.8.d.1 requires that the ESF filter train pressure drop be verified at a flow rate of 15,000 cfm ± 10%. This CTS requirement is not retained in ITS SR 3.7.12.4.

Comment: JFD 3.7-38 states that the "CTS permits testing at <u>whatever</u> flow rate is necessary to achieve the required negative pressure". The JFD contradicts CTS 4.7.8.d.1 which can be rectified by adopting the STS requirement for flowrate in ITS SR 3.7.12.4. These requirements are important to preserve the integrity of the HEPA filter and ensure that the air flow is at the correct flow rate and has filter capability while in ITS Action B, as proposed. Provide the new CTS DOC, a revise CTS markup and a new or revised JFD as appropriate for these CTS changes.

FLOG Response:

3.7.12.1.-6 (CPSES)

No CTS 3/4.7.8 requirement
ITS SR 3.7.12.6
DOC 12-07-M
JFD 3.7-39

The CTS 3/4.7.8 has been modified by ITS SR 3.7.12.6 which adds a new requirement to "verify that each non-ESF fan stops on an actual or simulated ESF fan actuation signal".

Comment: This CTS change as proposed is acceptable; however the accompanying Bases lack the detail required of the STS format. There is no justification for the selected Frequency. Also, the discussion provided in JFD 3.7-39 should be included in the Bases to clearly explain the purpose of this SR. Revise the ITS SR 3.7.12.6 Bases, as necessary, to meet the STS content standards for this new requirement.

FLOG Response:

3.7.12 Auxiliary Building Ventilation System (ABVS)

3.7.12.2.-1 (DCPP)

CTS 3.7.6.1 Action b
ITS 3.7.12 Action
DOC 12-xx-A
DOC 12-10-M

With only one exhaust fan Operable, CTS 3.7.6.1 Action b requires the restoration of two exhaust fans Operable within 7 days or shutdown to Mode 5 within 36 hours. ITS 3.7.12 Action B has similar Required Actions but changes the Condition statement to when "one ABVS train" is inoperable rather than "the exhaust fan".

Comment: DOC 12-10-M is identified as the technical Basis for this change; when in fact, it is a middle step to the real change, which is use of "ABVS trains" in place of "exhaust fans". DOC 12-10-M is acceptable for the LCO statement above but a new DOC should be provided which is appropriate for this CTS change.

FLOG response:

3.7.12.2.-2 (DCPP)

CTS 4.7.6.1.a.2
Bases for ITS SR 3.7.12.1
DOC 12-06-LG

CTS 4.7.6.1.a.2 pertains to verification that each exhaust fan is aligned to receive electrical power from a separate Operable vital bus. This CTS requirement is moved to the Bases for ITS SR 3.7.12.1.

Comment: This DOC contains no technical justification for determining whether this CTS requirement can be moved to the Bases. The reference to the "LG" NSHC is of no help in evaluating this CTS change. Without this justification, it is recommended to retain this CTS surveillance. (Also, see Comments 3.7.10.-3 and 3.7.10.-17 of ITS 3.7.10 and Comment 3.7.13.1.-2 of ITS 3.7.13 (DCPP) for comparable situations.)

FLOG Response:

3.7.12.2.-3 (DCPP)

CTS 3/4.7.6.1 Action a
ITS 3.7.12 Action A
DOC 3.7-cc

CTS 3.7.12 Action A permits 24 hours to restore an inoperable HEPA filter and charcoal adsorber filter bank. ITS 3.7.12 Action A retains these CTS requirements.

Comment: Issue #1 - The Bases Background discusses the "manually initiated heater" which is also common to both ABVS trains for emergency operations as similar to this Action A.

Therefore; add the common "manually initiated heater" to ITS Action A as another component which must be restored in 24 hours. **Issue #2** - ITS SR 3.7.12.1 must be modified to state that each train is "initiated manually from the control room" to periodically verify that this function is available if needed in emergency operations.

FLOG Response:

3.7.12.2.-4 (DCPP)

CTS 4.7.6.1.b and d
ITS SRs 3.7.12.3, 3.7.12.4, and 3.7.12.6
DOC 12-xx-LSx

CTS 4.7.6.1.b requires ABVS filter testing once per 18 months and CTS 4.7.6.1.d requires each ABVS train to be actuated and pressurization tested once per the REFUELING INTERVAL. The CTS markup for 4.7.6.1.b has changed the 18 months to once per the "REFUELING INTERVAL". ITS SRs 3.7.12.3, 3.7.12.4, and SR 3.7.12.6 Frequency requirements are stated as once per 24 months.

Comment: The Bases for SR 3.7.12.3 and SR 3.7.12.6 state the Frequency is 24 months which is not consistent with the CTS markup. These changes have been proposed without any DOC or JFD. There is no technical justification provided for these CTS changes. Adopt the STS text or withdraw these CTS changes.

FLOG Response:

3.7.12.2.-5 (DCPP)

CTS 4.7.6.1.b.2
ITS SR 3.7.12.4
DOC 10-17-A
JFD 3.7-23

CTS 4.7.6.1.b.2 verifies the system flow rate of 73,500 cfm ±10% during system operation. This CTS requirement has not been retained in ITS SR 3.7.12.4.

Comment: JFD 3.7-23 states the system is designed to meet a building in-flow requirement rather than a negative pressure requirement. Explain how this in-flow requirement can be verified "as achieved" without the verification of the ABVS train system design flow rates which are done in CTS 4.7.6.1.b.2. Also, state what is the ABVS system mode of operation utilized when this test is conducted. Adopt the standard text for STS SR 3.7.12.4 or provide detailed justification why these CTS requirements are not retained.

FLOG Response:

3.7.12.2.-6 (DCPP) CTS 3/4.7.6.1
ITS 3.7.12 Action C
DOC 3.7-23

The ITS 3.7.12 contains an "Action C" which is not part of the STS upon which this submittal is to be based. Also, the ITS header refers to an another system "ABACS" which is unknown in the STS model to be used in this submittal.

Comment: DCPP has presented an ITS markup on a version of the NUREG-1431 (STS) which is not issued by the NRC. Submit ITS markup on correct version.

FLOG Response:

3.7.13 Fuel Handling Building Ventilation System (FHBVS)

3.7.13.1.-1 (DCPP) CTS 3.9.12 Action a and b
ITS 3.7.13 Actions A and B
DOC (3.9) 12-02-LG

In CTS 3.9.12 Actions a and b, when one FHBVS train is inoperable, fuel movement and "crane operation with loads over the spent fuel pool" can proceed within limitations; and, with two FHBVS trains inoperable, fuel movement and "crane operation with loads over the spent fuel pool" are suspended. ITS 3.7.13 does not retain these requirements.

Comment: The DOC states the phrase "crane operations with loads over the spent fuel pool" is removed from the CTS but there is no location for where this CTS requirement is to be found. Revise this DOC to provide this additional discussion.

FLOG Response:

3.7.13.1.-2 (DCPP) CTS 4.9.12 Action a
Bases for ITS Applicable Safety Analysis, LCO, Action A and SR Note
DOC (3.9) 12-09-LG

CTS 4.9.12 Action a verifies that the remaining Operable FHBVS train is capable of being powered from a separate Operable emergency power source. This CTS requirement is moved to four places in the Bases for ITS Applicable Safety Analysis, LCO, Action A and SR Note.

Comment: This DOC contains no technical justification for determining whether this CTS requirement can be moved to the Bases. The reference to the "LG" NSHC is of limited help in evaluating this CTS change. Without this justification, this Operability requirement must be included as a note to the LCO statement rather than repetitively buried in the Bases. (See

Comments 3.7.10.-3 and 3.7.10.-17 of ITS 3.7.10 and Comment 3.7.12.2.-2 of ITS 3.7.12 (DCPP) for comparable situations.)

FLOG Response:

3.7.13.1.-3 (DCPP)

CTS 4.9.12.b, c, e, and f
ITS SR 3.7.13.2 and ITS 5.5.11
DOC (3.9) 12-04-A
DOC (3.9) 12-10-LS9

Comment: DOC (3.9) 12-04-A is referenced as the technical basis for changes made to 3.9.12 Action a and to 4.9.12.d.2. However, this DOC does not apply to the changes made to these portions of the CTS. These DOC references in the CTS markup should be removed or DCPP should explain their necessity for being there.

DCPP Response:

3.7.13.1.-4 (DCPP)

CTS 4.9.12.a
ITS SR 3.7.13.1
DOC (3.9) 12-bb-LSb

CTS 4.9.12.a verifies at least once per 31 days that each FHBVS train operates by "initiating flow through ... the HEPA filters and the charcoal absorbers" and each heater/component operates for its specified length of time. ITS SR 3.7.13.1 requires these similar verifications but the quoted phrase is not retained.

Comment: This ITS proposed change is acceptable; however there is no technical justification provided to justify why this phrase is not retained in the ITS SR 3.7.13.1. In other similar DOCs (i.e 10-06-LG), these details of how to perform the test are identified and then moved to the Bases of the applicable ITS SR. Provide a revised DOC and CTS markup.

FLOG Response:

3.7.13.1.-5 (DCPP)

CTS 4.9.12.b and d
ITS SRs 3.7.13.3, 3.7.13.4, and [3.7.13.5]
DOC (3.9)12-xx-LSx

CTS 4.9.12.b requires FHBVS filter testing once per 18 months and CTS 4.9.12.d requires each FHBVS train to be actuated and pressurization tested once per the REFUELING INTERVAL. The CTS markup for 4.9.12.b has changed the 18 months to once per the "REFUELING INTERVAL". ITS SR 3.7.13.3 and SR 3.7.13.4 Frequency requirements are stated as once per 24 months.

Comment: The Bases for SR 3.7.13.3 and SR 3.7.14.4 state the Frequency is 24 months which is not consistent with the CTS markup. These changes have been proposed without any DOC or JFD. There is no technical justification provided for these CTS changes. Adopt the STS text or withdraw these CTS changes.

FLOG Response:

3.7.13.1.-6 (DCPP)

CTS 4.9.12.b.1 and 3
ITS SR 3.7.13.4
DOC (3.9)12-11-A
JFD 3.7-49

CTS 4.9.12.b.1 and 3 verify FHBVS system flow rate of 35,700 cfm ± 10% at least once per 18 months. This CTS requirement is not retained in ITS SR 3.7.13.4.

Comment: Issue #1 - ITS SR 3.7.13.4 should state the required flow rate for each train for the HEPA filters to be effective and to preserve the integrity of the HEPA filter at the specified flow rate range of ± 10%. JFD 3.7-49 states that the "makeup flow rate requirement" is deleted when there is none stated in the CTS or ITS. There are numerous CTS train flow rate requirements which must be met via ITS SR 3.7.13.4 to achieve the required building negative pressure. Adopt the text of the STS SR requirement or explain in more detail why this is not required. **Issue #2** - There is no CTS DOC identified on the CTS markup for CTS 4.7.9.12.b.1 which is not retained. Explain technical basis for this change. For both of these issues, provide a new or revised CTS DOC, a revised CTS markup and a new or revised JFD, as appropriate for these CTS changes.

FLOG Response:

3.7.13.-7 (DCPP)

CTS 3.9.12 Action a
ITS 3.7.13 Action A and B
JFD 3.7-43

With one FHBVS train inoperable, CTS 3.9.12 Action a permits operations to proceed providing the Operable train is in operation. ITS 3.7.13 Action A immediately requires either of three actions which are to restore the train Operable, place the Operable train in operation or suspend movement of fuel.

Comment: The rewrite of Action A is an editorial combining of STS Action A and C into one Action which makes the immediate restoration of the inoperable train impossible. There is no technical justification provided for not adopting the STS format which can easily replicate the CTS requirements. Revise the DOCs or JFDs as necessary to adopt the STS text.

FLOG Response:

3.7.13.-8 (DCPP) CTS 4.9.12.b.1
STS SR 3.7.13.5
DOC (3.9) 12-ee-LSe

CTS 4.9.12.b.1 requires that damper valve "M-29" is closed while operating the system with flow through the HEPA filter and charcoal adsorbers. ITS 3.7.13 does not contain a similar requirement.

Comment: STS SR 3.7.13.5 requires verification that each [FHBVS] filter bypass damper can be closed. There is no JFD provided to explain why this SR is not adopted when there appears to be an exact similarity between the CTS and STS requirements. Provide an explanation to justify not adopting or adopt the STS requirement.

FLOG Response:

3.7.13 Emergency Exhaust System (EES)

3.7.13.2.-1 (Callaway) (WCGS) CTS 3/4.7.7 and 3/4.9.13
ITS 3.7.13, Applicability, Actions, SRs and Bases
DOC (3.7) 12-08-M
DOC (3.7)12-09-A

CTS 3/4.7.7 defines various EES surveillance requirements for the fuel building when in fact these requirements should apply also to the auxiliary building. ITS 3.7.13 has corrected these CTS errors by adding Notes to the Applicability, clarifying the Actions and adding a new SR.

Comment: This is an "administrative" change and not a "more restrictive" change to adapt the current licensing basis to reflect the original design. It is noted these tests have been performed but not under the guidance of the CTS. Therefore, this formalizes what has been current practice. For Callaway, revise DOC 12-08-M for an administrative change and revise the CTS markup where it is identified for the Applicability Note and the new SR per Insert K. Delete the use of this DOC for Insert M where it clearly does not apply. DOC 12-09-A as presented contradicts ITS SR 3.7.13.4; so delete this DOC as redundant to DOC 12-08-A. Also, CTS 4.7.7.d.2 for ITS SR 3.7.13.4 and CTS 3.9.13.d.3 for ITS 3.7.13.5, must correctly identify the Auxiliary and Fuel Building in the CTS to the respective SIS and FBVIS mode of operation to match the proposed ITS SR requirements. For WCGS, activate this DOC 12-08-A as an administrative change and then use it to identify the addition of the Applicability Note which is not identified in the CTS markup. Also, CTS 4.7.7.b.1 for ITS SR 3.7.13.4 and CTS 3.9.13.g.2 for ITS 3.7.13.5 are not identified in the CTS which need to have the respective SIS and FBVIS mode of operation identified to match the proposed ITS SR requirements.

FLOG Response:

3.7.13.2.-2	(Callaway) (WCGS)	CTS 3.7.7 Action, Insert M[New c]; CTS 3.9.13[new c] ITS 3.7.13 Action B, C, D, E, and [F] DOC (3.7) 10-20-LS39 DOC (3.9) 12-12-LS26 JFD 3.7-57

These changes are beyond the scope of a conversion because the industry traveler referenced in this DOC (WOG-86) has not been approved by the NRC.

Comment: Withdraw the changes or adopt the STS.

FLOG Response:

3.7.13.2.-3	(Callaway) (WCGS)	CTS 4.7.7.a and CTS 4.9.13.a ITS SR 3.7.13.1 DOC (3.7) 12-05-LS32 DOC (3.7) 10-06-LG DOC (3.9) 12-07-LS25

CTS 4.7.7.a and CTS 4.9.13.a verify at least once per 31 days on a Staggered Test Basis that each EES train operates and each heater/component operates for its specified length of time. ITS SR 3.7.13.1 requires these similar verifications every 31 days but not on a Staggered Test Basis.

Comment: **Issue #1** - This ITS proposed change is acceptable; however there is no technical justification provided in these DOCs. Also, this DOC refers to the contents of the NSHC that contains a justification only for Vogtle which is not applicable. What is the technical justification that is derived directly from the operating history of the plants in this submittal? Revise the DOCS and the CTS markup. **Issue #2** - For WCGS, the details of how to perform the test of 4.9.13.a should be identified and then moved to the Bases of ITS SR 3.7.13.1 under DOC 10-06-LG, as is done in Callaway for 4.7.7.a. For Callaway, these CTS 4.9.13.a details are moved but the CTS markup does not show this as occurring under DOC 10-06-LG. Provide a revised DOC and CTS markup.

FLOG Response:

3.7.13.2.-4	(Callaway) (WCGS)	CTS 4.7.7.b.3; CTS 4.9.13.b.3; INSERT K for Callaway ITS SR 3.7.13.4 and SR 3.7.13.5 DOC (3.7) 10-17-A DOC (3.9) 12-11-A JFD 3.7-49

CTS 4.7.7.b.3 and CTS 4.9.13.b.3 verify a system flow rate(s) of [6000/9000] cfm ± 10% at least once per 18 months. This CTS requirement is not retained in ITS SR 3.7.13.4 or SR 3.7.13.5.

Comment: ITS SRs 3.7.13.4 and 3.7.13.5 should state the required flow rate for each train for the HEPA filters to be effective and to preserve the integrity of the HEPA filter at the specified flow rate range of ± 10%. JFD 3.7-49 states that the "makeup flow rate requirement" is deleted when there is none stated in the CTS or ITS. There are numerous CTS train flow rate requirements which must be met via the ITS SRs 3.7.13.4 and 5 to achieve the required building negative pressure. Adopt the STS SR requirement or explain in more detail why this is not required. Provide a new or revised CTS DOC, a revised CTS markup and a new or revised JFD, as appropriate for these CTS changes.

FLOG Response:

3.7.13.2.-5	(Callaway)	CTS 4.7.7.b.1 & 2; d.2 & 3 and CTS 4.9.13.d.2 & 3 ITS SR 3.7.13.3, SR 3.7.13.4 and ITS SR 3.7.13.5 DOC (3.9) 12-06-A

CTS 4.7.7.b.1 & 2, d.2 & 3 and CTS 4.9.13.d.2 & 3 require at least once per 18 months that the EES "System" is actuated and that the "required building" negative pressure is achieved. ITS SR 3.7.13.3, SR 3.7.13.4 and ITS SR 3.7.13.5 require the same except each "train" is verified rather than the "system".

Comment: The CTS changes should be the changing of "system" to "train", identifying the "correct" building and specifying the mode of operation which produces the required negative pressure. These CTS changes are not identified in most of the CTS locations. The proposed ITS SRs appear to be acceptable; however, all the changes to CTS requirements must be identified. Revise the CTS markups.

FLOG Response:

3.7.13.2.-7	(Callaway) (WCGS)	CTS 4.9.13.d.2 [g.2] ITS SR 3.7.13.3 DOC (3.9)12-ww-LSw

For Callaway, CTS 4.9.13.d.2; and for WCGS CTS 4.9.13.g.2; each respectively require at least once per 18 months that the EES "System" is actuated on an actual or simulated test signal.

ITS SR 3.7.13.3 requires the same except this SR does not contain the surveillance details which are moved to the Bases.

Comment: The ITS SR 3.7.13.5 is acceptable; however, the CTS markup does not identify this movement of the CTS requirements to the ITS Bases for SR 3.7.13.3. A new DOC in Chapter 3.9 similar to DOC (3.7)10-6-LG in Chapter 3.7 could be used in this case to identify this "less restrictive" technical change. Revise the CTS markup and provide new DOCs as appropriate.

FLOG Response:

3.7.13.2.-8 **(Callaway)** CTS 3/4.7.7
(WCGS) ITS 3.7.13 Action A and D
JFD 3.7-07

ITS 3.7.13 Actions A and D both cover one EES train inoperable. Action A is for Modes 1, 2, 3, and 4 and Action D is "During the movement of irradiated fuel assemblies".

Comment: The original STS text appears to be the same as these ITS Conditions are now modified with this JFD. The ITS appears to be acceptable; however, the concern about the EES remaining in standby is not apparent. Explain in more depth the technical problem and the need for this deviation from the STS.

FLOG Response:

3.7.13.2.-9 **(Callaway)** CTS 3/4.7.7
(WCGS) STS SR 3.7.13.5
DOC (3.7) or (3.9) 12-yy-LSy
JFD (3.7)-qq

STS SR 3.7.13.5 requires verification that each EES filter bypass damper can be closed. The CTS does not contain a similar requirement.

Comment: There is no JFD provided to explain why this SR is not adopted in ITS 3.7.13. Provide an explanation to justify not adopting the STS.

FLOG Response:

3.7.13.2.-10 **(Callaway)** CTS 3.9.13 Action a and b
(WCGS) ITS 3.7.13 Actions A and B
DOC (3.9) 12-02-LG

In CTS 3.9.13 Actions a and b, with one FHBVS train inoperable, fuel movement and "crane operation with loads over the spent fuel pool" can proceed within limitations; and, with two

FHBVS trains inoperable, fuel movement and "crane operation with loads over the spent fuel pool" are suspended.

Comment: The DOC states the phrase "crane operations with loads over the spent fuel pool" is removed from the ITS but there is no location for where this CTS requirement is to be found. Revise this DOC to provide this additional discussion.

FLOG Response:

3.7.14 Number not used by any FLOG plant

3.7.15 [Spent] Fuel (Storage) Pool (Area) Water Level

3.7.15.-1 CTS 3.9.10[11], Applicability
ITS 3.7.15 Applicability and Licensee Controlled Documents
DOC (3.9) 11-01-LG

CTS 3.9.10[11] is Applicable whenever irradiated fuel assemblies are in the [spent] fuel pool. ITS 3.7.15 is Applicable during movement of irradiated fuel assemblies in the [spent] fuel pool.

Comment: The CTS change appears to be acceptable as proposed in the ITS 3.7.15 markup; however, there is no explanation pertaining to what is actually relocated to the Licensee Controlled Documents. This appears to be a "LS" category change rather than an "LG" change. Revise the DOC, or provide a new DOC and revise the CTS markup, as necessary, for the appropriate change category and technical justification required for this CTS change.

FLOG Response:

3.7.15.-2 (Callaway) (WCGS) CTS 3.9.11 Action b
ITS 3.7.15 Note to Required Action A.1
DOC (3.9) 14-10-A

CTS 3.9.11 Action b states "The provisions of Specification 3.0.3 and 3.0.4 are not applicable". ITS 3.7.15 has a Note to Required Action A.1 which states that only "LCO 3.0.3 is not applicable."

Comment: The DOC for this CTS change provides inadequate technical justification to explain why this administrative change is acceptable. Provide a revise DOC that contains this technical discussion.

FLOG Response:

3.7.15.-3 (CPSES)

CTS 3.9.10, Applicability
ITS 3.7.15 Applicability; Licensee Controlled Documents
DOC (3.9) 11-01-LG
JFD 3.7-45

CTS 3.9.10 Applicability states "Whenever irradiated fuel assemblies are in the fuel storage racks". ITS 3.7.15 Applicability states "During movement of irradiated fuel assemblies in the fuel storage areas".

Comment: JFD 3.7-45 indicates that this LCO also applies to fuel storage areas in other locations of the plant which were never apparent in CTS 3/4.9.10. Provide a DOC which describes in more detail how this CTS change applies to all fuel storage areas including the in-containment storage area(s). There is no Bases Background or Applicability discussion which adequately describes the full intended application of this ITS LCO. Provide these new Bases. Revise the DOC, JFD or provide new justifications, and revise the CTS markup, as necessary, for the appropriate change category and technical justifications required for this CTS change.

FLOG Response:

3.7.16 Spent Fuel Pool Boron Concentration

3.7.16.-1 (DCPP)

CTS 3.9.14.2 Action b
ITS 3.7.16 Note to Required Action A.1
DOC (3.9) 14-10-A

CTS 3.9.14.2 Action b states "The provisions of Specification 3.0.3 and 3.0.4 are not applicable". ITS 3.7.16 has a Note to Required Action A.1 which states that only "LCO 3.0.3 is not applicable."

Comment: The DOC for this CTS change provides inadequate technical justification to explain why this administrative change is acceptable. Provide a revise DOC that contains this technical discussion.

FLOG Response:

3.7.16.-2 (DCPP)

CTS 3.9.14.2, Applicability
ITS 3.7.16, Applicability
JFD 3.7-53

CTS 3.9.14.2, Applicability states "Whenever fuel assemblies are in the spent fuel pool" and ITS 3.7.16, Applicability states "When fuel assemblies are stored in the spent fuel pool".

Comment: The STS Applicability provides an additional limitation which restricts the LCO to only apply if "... a fuel storage pool verification has not been performed since the last movement of fuel assemblies in the fuel storage". This is a less restrictive change to the current licensing basis. Also, the STS 3.7.16 text directly couples this LCO to the fuel storage requirements of STS 3.7.17 to ensure the double contingency principle is maintained. The STS Required Action A.2.2 is directly related to the STS Applicability and the Frequency (STS = 7 days; versus CTS = 31 days) must be consistent with the fuel movement activities. Adopt the STS text omitted or provide additional explanation and technical justification for not adopting the preferred STS LCO structure.

FLOG Response:

3.7.16.-3 (Callaway) CTS 3.9.12. Action b (for Callaway and WCGS)
(CPSES) STS 3.7.16
(WCGS) JFD 3.7-dd

STS 3.7.16, Fuel Storage Pool Boron Concentration, was not adopted.

Comment: There is no detailed explanation for why this STS LCO was not adopted. Also, see Comment 3.7.17.1.-2 of ITS 3.7.17.

FLOG Response:

3.7.17 Spent Fuel Assembly Storage

3.7.17.1.-1 (Callaway) CTS 3.9.12, Applicability
(WCGS) ITS 3.7.17, Applicability
DOC (3.9) 14-02-M

CTS 3.9.12, Applicability states "Whenever irradiated fuel assemblies are in the spent fuel pool" and ITS 3.7.17, Applicability states "Whenever any fuel assembly is stored in Region 2 of the spent fuel pool".

Comment: The change in the CTS Applicability provides an additional limitation which restricts the LCO to only apply if "any fuel assembly is in Region 2 of the spent fuel pool". Previously, the LCO applied to both Regions 1 and 2. The "more restrictive" determination is not justified with the technical explanation provided. Regardless, since fuel assemblies are already in storage, this is a technical administrative change to standardize requirements for the verifications of fuel composition and burnup history, currently performed, prior to loading into Region 2 of the spent fuel pool. Revise the DOC, or provide a new DOC and revise the CTS markup, as necessary, for the appropriate change category and technical justification required for this CTS change.

FLOG Response:

3.7.17.1.-2 (Callaway) CTS 3.9.12, Action a
(CPSES) ITS 3.7.17
(WCGS) DOC (3.9) 14-04-LS13

With the fuel assembly storage requirements not met, CTS 3.9.12 Action a requires the "boron concentration of the spent fuel pool to be verified ≥ 2000 ppm at least once per 8 hours". This CTS action is not retained in ITS 3.7.17.

Comment: The DOC states this action is consistent with the STS which is incorrect. The STS has an LCO for spent fuel pool boron concentration requirements which has not been adopted. The STS 3.7.16 serves the same purpose as this CTS Action a requirement which is to ensure the double contingency principle is maintain for the fuel storage requirements. These requirements are clearly stated in the STS Bases for both STS 3.7.16 and ITS 3.7.17 which are dependent upon one another. This CTS requirement shall be retained by adopting the STS 3.7.16. (For CPSES, recently approved LAR 94-22, TXX-94325 provides a current licensing basis for spent fuel storage and spent fuel boron concentration. However, CPSES should still adopt STS 3.7.16.) Revise the DOC, or provide a new DOC and revise the CTS markup, as necessary, for the appropriate change category and technical justification required to retain this CTS requirement. (Also, see Comment 3.7.16.-3 of ITS 3.7.16)

FLOG Response:

3.7.17.1.-3 (Callaway) CTS 3.9.12 Action b
(WCGS) ITS 3.7.17 Note to Required Action A.1
DOC (3.9) 14-10-A

CTS 3.9.12 Action b states "The provisions of Specification 3.0.3 and 3.0.4 are not applicable". ITS 3.7.17 has a Note to Required Action A.1 which states that only "LCO 3.0.3 is not applicable."

Comment: The DOC for this CTS change provides inadequate technical justification to explain why this administrative change is acceptable. Provide a revised DOC that contains this technical discussion.

FLOG Response:

3.7.17.1.-4 (Callaway) CTS 4.9.12
(WCGS) ITS 3.7.17 or Licensee Controlled Documents
DOC (3.9) 14-05-LG

CTS 4.9.12 requires specific verification steps to be completed prior to placing a fuel assembly in Region 2 and a record kept for the time period in storage. ITS SR 3.7.17 does not retain these requirements.

Comments: Issue #1 - These CTS requirements are relocated to Licensee Controlled Documents that are not identified. Generic DOC "LG" is inadequate because there is no technical justification provided for the removal of these CTS requirements. **Issue #2** - The first sentence of CTS 4.9.12 should be addressed in this DOC. Provide a description of how this sentence is treated in the conversion of CTS requirements. Revise the DOC or provide a new DOC and a revised CTS markup which is appropriate for this CTS change.

FLOG Response:

3.7.17.1.-5 (Callaway) CTS 3.9.12.a
(WCGS) ITS 3.7.17 and SR 3.7.17.1
DOC (3.9) 14-aa-A

CTS 3.9.12.a states the combination of initial enrichment and cumulative exposure shall be in accordance with Figure 3.9-1 which is similarly converted into the format of ITS 3.7.17.

Comment: The LCO statement of ITS 3.7.17 also provides for storage in accordance with Specification 4.3.1.1 and ITS SR 3.7.17.1 also verifies these requirements prior to placement in Region 2. There is no DOC provided to explain why these new STS requirements are appropriate changes to the CTS requirements. Provide this detailed explanation to adopt the STS text.

FLOG Response:

3.7.17.1.-6 (Callaway) CTS 3.9.12.b
(WCGS) ITS 3.7.17 or Licensee Controlled Documents?
DOC (3.9) 14-01-LS11

CTS 3.9.12.b places specific prevention to refrain from re-designating the storage locations of fuel assemblies while refueling operations are in progress. ITS SR 3.7.17 does not retain these requirements.

Comments: There is no technical justification provided in the DOC for this less restrictive CTS change. These CTS requirements are relocated to a location not identified. The NSHC states that "any changes of storage locations from Region 1 to Region 2 are controlled by plant procedures" which is unacceptable; and which directly contradicts the deleted CTS

requirement. Provide detailed explanations for these CTS changes, state if the CTS requirement is retained anywhere and revise the DOC and CTS markup, as appropriate for these CTS changes.

FLOG Response:

3.7.17.1.-7 (CPSES) CTS 5.6.1.1.e and f
ITS 3.7.17
DOC (5.0) 06-04-A

CTS 5.6.1.1.e and f contain the requirements for spent fuel storage racks. The CTS current licensing basis for spent fuel storage was approved in LAR 94-22, TXX-94325.

Comment: Issue #1 - The Region 1 and Region 2 designations are not used in the LCO but the high density storage racks are defined as the Applicable basis for this LCO. Figure 3.7.17-1 refers to Region 2 which is inconsistent. **Issue #2** - STS 3.7.16 should be added to the ITS. (See the above Comment 3.7.17.1.-2 of this LCO.)

FLOG Response:

3.7.17.1 Spent Fuel Assembly Storage (for Region 1)

3.7.17.2.-1 (DCPP) CTS 3/4.9.14.1 and 3/4.9.14.3
ITS 3.7.17.1 and ITS 3.7.17.2
JFD 3.7-51

CTS 3/4.9.14.1 and 3/4.9.14.3 respectively control storage of fuel assemblies into Region 2 and Region 1 of the spent fuel pool. ITS 3.7.17.1 and ITS 3.7.17.2 respectively control storage of fuel assemblies into Region 1 and Region 2 of the spent fuel pool.

Comment: Issue #1 - The two LCOs under ITS 3.7.17 are acceptable ; however, the LCOs should be retitled so that the "for Region 1" and "for Region 2" are added to the titles for the purpose of identification and to keep the requirements separated. **Issue #2** - ITS 3.7.17.1 is stated as a "markup of NUREG-1431, Rev. 1" when this is not the case. Revise the JFD, DOC or provide new justifications as appropriate for these CTS changes.

FLOG Response:

3.7.17.2.-2 (DCPP)

CTS 4.9.14.3
ITS 3.7.17.1 or Licensee Controlled Documents
DOC (3.9) 14-05-LG

CTS 4.9.14.3 requires specific verification steps to be completed prior to placing a fuel assembly in Region 1 and a record kept for the time period in storage. ITS SR 3.7.17.1.1 does not retain these requirements.

Comments: Issue #1 - These CTS requirements are relocated to Licensee Controlled Documents that are not identified. Generic DOC "LG" is inadequate because there is no technical justification provided for the removal of these CTS requirements. **Issue #2** - The first sentence should be addressed in this DOC. Provide a description of how this sentence is treated in the conversion of CTS requirements. Revise the DOC or provide a new DOC and a revised CTS markup which is appropriate for this CTS change.

FLOG Response:

3.7.17.2.-3 (DCPP)

CTS 3.9.14.3 Action b
ITS 3.7.17.1 Note to Required Action A.1
DOC (3.9) 14-10-A

CTS 3.9.14.3 Action b states "The provisions of Specification 3.0.3 and 3.0.4 are not applicable". ITS 3.7.17.1 has a Note to Required Action A.1 which states that only "LCO 3.0.3 is not applicable."

Comment: The DOC for this CTS change provides inadequate technical justification to explain why this administrative change is acceptable. Provide a revised DOC that contains this technical discussion.

FLOG Response:

3.7.17.2.-4 (DCPP)

CTS 3.9.14.3.a and b
ITS 3.7.17.1 and SR 3.7.17.1.1
JFD (3.9)-bb

CTS 3.9.14.3.a and b states the combination of initial enrichment and cumulative exposure shall be in accordance with Figure 3.9-3 which is similarly converted into the format of ITS 3.7.17.1.

Comment: The LCO statement of STS 3.7.17 also provides for storage "in accordance with Specification 4.3.1.1" and STS SR 3.7.17.1.1 also verifies these requirements prior to placement to prevent an error. There is no JFD provided to explain why these similar STS requirements were not adopted. Provide this detailed explanation or adopt the STS text.

FLOG Response:

3.7.17.2.-5 (DCPP) CTS 3.9.14.3, Action a
ITS 3.7.17.1
DOC (3.9) 14-04-LS13

With the fuel assembly storage requirements not met, CTS 3.9.14.3 Action a requires the "boron concentration of the spent fuel pool to be verified ≥ 2000 ppm at least once per 8 hours". This CTS action is not retained in ITS 3.7.17.1.

Comment: The CTS markup does not identify this "less restrictive CTS change". Revise the CTS markup for this change.

FLOG Response:

3.7.17.2 Spent Fuel Assembly Storage (for Region 2)

3.7.17.3.-1 (DCPP) CTS 3/4.9.14.1 and 3/4.9.14.3
ITS 3.7.17.1 and ITS 3.7.17.2
JFD 3.7-51

CTS 3/4.9.14.1 and 3/4.9.14.3 respectively control storage of fuel assemblies into Region 2 and Region 1 of the spent fuel pool. ITS 3.7.17.1 and ITS 3.7.17.2 respectively control storage of fuel assemblies into Region 1 and Region 2 of the spent fuel pool.

Comment: The two LCOs under ITS 3.7.17 are acceptable; however, the LCOs should be retitled so that the "for Region 1" and "for Region 2" are added to the titles for the purpose of identification and to keep the requirements separated.

FLOG Response:

3.7.17.3.-2 (DCPP) CTS 4.9.14.1
ITS 3.7.17.2 or Licensee Controlled Documents
DOC (3.9) 14-05-LG

CTS 4.9.14.1 requires specific verification steps to be completed prior to placing a fuel assembly in Region 2 and a record kept for the time period in storage. ITS SR 3.7.17.2.1 does not retain these requirements.

Comments: Issue #1 - These CTS requirements are relocated to Licensee Controlled Documents that are not identified. Generic DOC "LG" is inadequate because there is no

technical justification provided for the removal of these CTS requirements. **Issue #2** - The first sentence should be addressed in this DOC. Provide a description of how this sentence is treated in the conversion of CTS requirements. Revise the DOC or provide a new DOC and a revised CTS markup which is appropriate for this CTS change.

FLOG Response:

3.7.17.3.-3 (DCPP) CTS 3.9.14.1 Action b
ITS 3.7.17.2 Note to Required Action A.1
DOC (3.9) 14-10-A

CTS 3.9.14.1 Action b states "The provisions of Specification 3.0.3 and 3.0.4 are not applicable". ITS 3.7.17.2 has a Note to Required Action A.1 which states that only "LCO 3.0.3 is not applicable."

Comment: The DOC for this CTS change provides inadequate technical justification to explain why this administrative change is acceptable. Provide a revised DOC that contains this technical discussion.

FLOG Response:

3.7.17.3.-4 (DCPP) CTS 3.9.14.1.a; 4.9.14.1.1
ITS 3.7.17.2 and SR 3.7.17.2.1
JFD (3.9)-cc

CTS 3.9.14.1.a states the combination of initial enrichment and cumulative exposure shall be in accordance with Figure 3.9-2 which is similarly converted into the format of ITS 3.7.17.2.

Comment: The LCO statement of STS 3.7.17 also provides for storage "in accordance with Specification 4.3.1.1"; and SR 3.7.17.2.1 also verifies these requirements prior to placement in Region 2. There is no JFD provided to explain why these requirements were not adopted. Provide this detailed explanation or adopt the STS text.

FLOG Response:

3.7.17.3.-5 (DCPP) CTS 3.9.14.1, Action a
ITS 3.7.17.2
DOC (3.9) 14-04-LS13

With the fuel assembly storage requirements not met, CTS 3.9.14.1 Action a requires the "boron concentration of the spent fuel pool to be verified $\geq$ 2000 ppm at least once per 8 hours". This CTS action is not retained in ITS 3.7.17.2.

Comment: The CTS markup does not identify this "less restrictive CTS change". Revise the CTS markup for this CTS change.

FLOG Response:

3.7.17.3.-6 (DCPP)

CTS page 3/4 9-16; Figure 3.9-1
Bases for ITS 3.7.17.2 or Licensee Controlled Documents?
DOC (3.9) 15-01-R

The CTS markup includes a CTS page 3/4 9-16 which is identified as "Figure 3.9-1, Units 1 and 2 Spent Fuel Pool Layout". This page is not in ITS 3.7.17.1 or ITS 3.7.17.2. This appears to be part of Section 3.9 and not Section 3.7. With which CTS LCO is this associated? The DOC also does not seem consistent with the changes. Provide clarification of these changes.

FLOG Response:

3.7.18 Secondary Specific Activity

3.7.18.-1 (CPSES)

CTS 3/4.7.1.4
ITS 3.7.18
DOC 04-01-M
DOC 04-02-LS8

CTS 3/4.7.1.4 limits the secondary specific activity and it is converted to ITS 3.7.18, Secondary Specific Activity.

Comment: The CTS markup is not sufficiently completed for CTS 3/4.1.7.4 to show how the CTS changes are identified per the DOCs prepared for this ITS conversion. Provide a completed CTS markup for this CTS LCO.

FLOG Response:

3.7.19 Safety Chilled Water System

3.7.19.-1 (CPSES)

CTS 3.7.12 LCO
ITS 3.7.19 Bases
DOC 18-xx-LG

CTS 3.7.12 states that "At least two independent safety chilled water trains shall be Operable". ITS 3.7.19 states "Two safety chilled water trains shall be Operable".

Comment: The word "independent" on the CTS markup is not shown moved to the Bases of the ITS. The Bases ITS 3.7.19 contains descriptive detail of LCO Operability in the Bases Background discussion, second paragraph. Provide a DOC for this CTS change in a revision to the submittal.

FLOG Response:

3.7.19.-2 (CPSES)

CTS 4.7.12.a
ITS SR 3.7.19.1 and ITS Bases
DOC 18-yy-LSy

CTS 4.7.12.a verifies that each "manual, power operated or automatic" valve is in its correct position. ITS SR 3.7.19.1 requires the same verification.

Comment: The Bases Background, third paragraph, third sentence states that there are no automatic valves in this water system. Also, ITS SR Bases states this SR applies to manual valves only. The Bases contradict the CTS and ITS requirements. Revise the submittal to remove these contradictions and provide the missing JFD or DOC technical justifications for these changes.

FLOG Response:

3.7.19.-3 (CPSES)

CTS 4.7.12.b
Bases ITS 3.7.4, LCO discussion
DOC 18-02-LG

CTS 4.7.12.b requires demonstration that each "electrical switchgear area emergency fan coil units start" on a test signal. This requirement is not retained in the ITS SR 3.7.19.2.

Comment: This CTS requirement is proposed to be moved to a Licensee Controlled Document; however, there is no technical basis provided to justify the relocation. The generic "LG" NSHC is inadequate. Revise the submittal to provide this information.

FLOG Response:

3.7.19.-4 (CPSES)

CTS 4.7.12.a
ITS SR 3.7.19.1, Note
DOC 18-01-A

CTS 4.7.12.a has been modified by the addition of a note to ITS 3.7.19.1 stating that the "isolation of safety chilled water flow to individual components does not render the safety chilled water system inoperable".

Comment: The DOC does not describe and provide a technical justification regarding why this note is appropriate here. Also, the ITS SR 3.7.19.1 Bases do not discuss the inclusion or justification for this note. Revise the submittal.

FLOG Response:

3.7.19.-5 (CPSES)

CTS 4.7.12.b
ITS SRs 3.7.19.2
DOC 18-03-TR1

CTS 4.7.12.b verifies at least once per 18 months that each safety chilled water train pump chiller starts as designed upon receipt of a Safety Injection test signal. ITS SR 3.7.19.2 verifies the safety chilled water train pump and chiller starts on an actual signal or a simulated signal.

Comment: The DOC states that the specific identity of the simulated signal, is no longer retained in the SR but is to be moved to the Bases. A review of the ITS SR 3.7.19.2 Bases discussion shows this is not identified there. Revise the Bases accordingly per the DOC.

FLOG Response:

3.7.20 Uninterruptible Power Supply (UPS) HVAC System

3.7.20.-1 (CPSES)

CTS 3.7.11P.LCO, item a and b
Bases ITS 3.7.20P, Background
DOC 20-01-LG
JFD 3.7-48

CTS 3.7.11P LCO, items a and b described the details of what constitutes an Operable UPS. These details are moved to the Bases of ITS 3.7.20P, Background discussion.

Comment: The Bases discussion produces verbal description which has been transformed into the sketch included with the ITS 3.7.20P Bases. There are also comments on the Bases which pertain to the completeness of the LCO Operability description. CPSES should verify the attached sketch and respond by correction and/or modification of the Bases.

FLOG Response:

3.7.20.-2 (CPSES)

CTS 3.7.11P Applicability and Action
ITS 3.7.20P Applicability and Action Note
DOC 20-xx-LSx

CTS 3.7.11 Applicability and Action is for Mode 1, 2, 3, and 4 and the Actions are for "Units 1 and 2". CTS 3.7.11P Applicability is for Modes 1, 2, 3 and 4. ITS 3.7.20P Applicability is for Mode 1, 2, 3, and 4.

Comment: This apparent shared unit operation showed by the CTS Action is not retained in the ITS. The ITS Applicability should be similar to ITS 3.7.10 and ITS 3.7.11 for room air conditioning and temperature control. It should be either "At all times"; or "Modes 1, 2, 3, 4, 5, and 6"; or "When any unit is in Mode 1, 2, 3 or 4". The equipment in the UPS Rooms will dictate the appropriate mode of Applicability. Also, the Actions should be preceded by a Note stating "Actions shall apply simultaneously to both Units."

FLOG Response:

3.7.20.-3 (CPSES) CTS 3.7.11P Action a.
ITS 3.7.20P Action A
DOC 20-ww-A

CTS 3.7.11P Action a states "With one or more UPS & Distribution Room supported only by an Operable UPS A/C train" that is further qualified as "which is not the same train as the UPS in that room". This additional phrase is not retained in the ITS 3.7.20P Action A.

Comment: Issue #1 - The deletion of the phrase "which is not the same as the UPS in that room" is not technically justified with a DOC. Explain the CTS requirement and provide this justification in a new DOC. **Issue #2** - The Condition statement of Action A needs to be limited to apply if any unit is in the Mode of Applicability to differentiate it from the conditions for Action C.

FLOG Response:

3.7.20.-4 (CPSES) CTS 3.7.11P Action b
ITS 3.7.20P Action B and Bases
DOC 20-yy-LSy

CTS 3.7.11P Action b is for one or more rooms not supported by an Operable UPS fan coil or A/C train but with a UPS A/C train circulating air only. ITS 3.7.20P Action B is entered when two UPS System HVAC trains are inoperable.

Comment: Issue #1 - The addition of the new Required Actions B.1 and B.2 is not justified with a DOC. Provide these justifications in new DOCs. Also, the Action B condition logical connector phrase must be removed because there is no difference between Required Actions A.1 and B.1 which are determined concurrently. **Issue #2** - The maximum temperature for these rooms must be under normal operating conditions which is 104°F and should be explicitly stated here. The Bases state the maximum temperature is placed in the TRM which is unacceptable. The maximum room operating temperature cannot be permitted to exist at the abnormal operating temperature limit of 113°F while in this degraded mode because this could result in the temperature safety limits being exceeded. **Issue #3** - The Condition statement of Action B needs to be limited to apply if any unit is in the Mode of Applicability to differentiate it from the conditions for Action C. **Issue #4** - The Required Action B.3 Completion Time of 72

hours is not adequately justified in the Bases because the Basis provided is the same as for the 30 day Completion Time.

FLOG Response:

3.7.20.-5 (CPSES) CTS 3.7.11P Action a, b and c
ITS 3.7.20P Action C
DOC 20-zz-LSz

If the CTS 3.7.11 actions cannot be achieved, then the unit is placed in Mode 3 in 6 hours and in Mode 5 in 36 hours. CTS 3.7.11P Action c and ITS 3.7.20 Action C.1 permit an extra one hour to "Restore the required support" before entering an orderly shutdown.

Comment: The proposed ITS is not technically justified by a DOC, a JFD or by a technical justification in the Bases. Remove this requirement from the new CTS 3.7.11P and ITS. Also, the Condition C statement should be "Required Action and associated Completion Time of ~~Required Action A.2~~ Condition A or B not met in Modes 1, 2, 3 or 4." See Comments 3.7.20.-3 and 3.7.20.-4 above.

FLOG Response:

3.7.20.-6 (CPSES) CTS 4.7.11P.1
ITS SRs 3.7.20P.3
DOC 20-02-TR1

CTS 4.7.11P.1 verifies at least once per 18 months that each UPS A/C train actuates as designed upon receipt of a Safety Injection signal. ITS SR 3.7.20P.3 verifies the same UPS A/C train actuates on an actual signal or a simulated signal.

Comment: Issue #1 - The DOC states that the specific identity of the simulated signal, is no longer retained in the SR but is to be moved to the Bases. A review of the ITS Bases discussion for these SRs show they do not contain these testing details. Revise the Bases in accordance with the DOC. **Issue #2 -** The DOC 20-02-TR1 is not shown on the CTS markup. **Issue #3 -** How are the UPS & Distribution Room Fan coil units actuated and how is this verified? Since CTS 4.7.12.b is retained as ITS SR 3.7.19.2, then there should be a similar SR for the UPS & Distribution Room Fan coil units actuating each 18 months. Provide the appropriate technical explanation and justification.

FLOG Response:

CTS Section 3.7 LCOs normally relocated in accordance with the Split Report:

For all plants:

1: 14-01-R	**CTS 3/4.7.2, SG Pressure/Temperature Limits**
15-01-R	**CTS 3/4.7.6, Flood Protection**
16-01-R	**CTS 3/4.7.9, Snubbers**
17-01-R	**CTS 3/4.7.10, Area Temperature Monitoring**
19-01-R	**CTS 3/4.7.13, Main Feedwater Pressure/Temperature Limits**

The above CTS LCOs are proposed to be relocated to Licensee Controlled Documents.

Comment: For CPSES - There is no technical justification provided for the relocation of these CTS LCOs. Revise the DOCs to provide the missing technical justification. For the others - Where are the normal CTS LCOs which are apparently not part of the respective current licensing basis for these plants? If these CTS LCOs still exist, provide the same technical justifications as required for CPSES.

FLOG Response: