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SUBJECT: Forwards response to RAI re ITS Sections 1.0,3.0,3.5,3.7 & 5.0 for NMPNS,Unit 2.

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June 15, 1999
NMP2L 1872

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Subject: ***Request for Additional Information Regarding Improved Technical Specification (ITS) Sections 1.0, 3.0, 3.5, 3.7 and 5.0 for the Nine Mile Point Nuclear Station, Unit 2 (TAC No. MA3822)***

Gentlemen:

Niagara Mohawk Power Corporation (NMPC) transmitted an Application for Amendment regarding conversion of the Nine Mile Point Unit 2 (NMP2) Current Technical Specifications (CTS) to the ITS by letter dated October 16, 1998 (NMP2L 1830). Subsequently, by letters dated May 10, 1999 and May 18, 1999, the Nuclear Regulatory Commission (NRC) requested additional information pertaining to our Application for Amendment.

Attached to this letter are the requested NMPC responses for ITS Sections 1.0, 3.0, 3.5, 3.7 and 5.0.

Very truly yours,

John T. Conway
Vice President Nuclear Generation

JTC/TWP/mlh
Attachment

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A001

REQUEST FOR ADDITIONAL INFORMATION (RAI)

IMPROVED TECHNICAL SPECIFICATIONS (ITS)

NIAGARA MOHAWK POWER CORPORATION

NINE MILE POINT NUCLEAR STATION UNIT NO. 2

SECTION 1.0, USE AND APPLICATION

CTS 1.13, End-of-Cycle Recirculation Pump Trip System Response Time
ITS 1.1, Definitions, End of Cycle Recirculation Pump Trip (EOC-RPT) System Response Time

The licensee deleted "and" and placed "or" between the listings of turbine stop valves and turbine control valves in CTS. The same may be observed in ITS where it states, "movement of the turbine stop valves or turbine control valves." The utilization of "or" instead of "and" is a deviation from CTS and STS. Furthermore, no DOC is provided to address this change, nor is there any JFD justifying this difference.

Comment: Provide DOC and JFD to justify this change. Otherwise, use "and" instead of "or" as it appears in STS.

NMPC Response:

The Standard Technical Specifications (STS) states that the EOC-RPT SYSTEM RESPONSE TIME "shall be that time interval from initial signal generation by [the associated turbine stop valve limit switch or (emphasis added) from when the turbine control valve hydraulic oil control oil pressure drops below the pressure switch setpoint]..." Thus, the STS uses the word "or" not "and." The word "and" in the Current Technical Specifications (CTS) definition was changed to "or" to be consistent with the STS definition. This change was considered a minor editorial change, with no technical change intended, as identified by the CTS Discussion of Change (DOC) A.1. The words in the STS describing the manner in which the EOC-RPT SYSTEM RESPONSE TIME is measured (which are bracketed, indicating the plant specific method should be described) were modified in the Nine Mile Point Unit 2 (NMP2) Improved Technical Specifications (ITS) to be consistent with the current licensing basis. The change is justified by Justification for Deviation (JFD) 1, which states that the brackets have been removed and the proper plant specific information has been provided. It was noted, however, that the plant specific method for performing the response time measurement identified in the ITS did not retain the word "associated," which is used in both the CTS and STS definition when referring to the type of turbine valve. Therefore, the ITS definition of EOC-RPT SYSTEM RESPONSE TIME will be modified to include the word "associated" (i.e., "shall be that time interval from initial movement of the associated (emphasis added) turbine stop valves or turbine control valves..."). An appropriate change to the CTS markup will also be made.

SECTION 3.0, LCO AND SR APPLICABILITY

RAI 3.0-1 ITS SR 3.0.1 Surveillance Requirement Applicability

The approved TSTF-8 R1 affects STS SR 3.0.1.

Comment: Incorporate TSTF-8 R1, or provide JDF for not incorporating this generic change into the ITS SR 3.0.1.

NMPC Response:

The major reason for Technical Specification Task Force (TSTF)-8, Rev. 1, was to delete portions of the Notes in the Surveillance Requirements (SRs) of Section 3.8. Numerous Notes in the SRs of Section 3.8 precluded a SR from being performed while operating. The Notes further stated that credit could be taken for unplanned events that satisfy the SR, even if the unplanned event occurred while operating. This portion of the Notes was deleted by TSTF-8, Rev. 1, and effectively replaced with a Bases change to SR 3.0.1 that stated that even if an SR were precluded from being performed while operating (i.e., by a Note to the SR), an unplanned event could still be credited with performing the SR. The portion of the Notes to the SRs in 3.8 were not deleted, and this was justified by JFDs in the applicable 3.8 Specifications (ITS 3.8.1 and 3.8.4). Since the changes to the Notes in Section 3.8 were not adopted, the changes to the Bases for SR 3.0.1 were also not necessary, and this was also justified in the JFDs in ITS 3.8.1 and 3.8.4. The JFDs in ITS 3.8.1 and 3.8.4 have been accepted by the NRC reviewer for Section 3.8, thus the approved TSTF-8 Rev. 1 changes were not adopted in Section 3.8. However, for clarity, a similar JFD will be added to Section 3.0 to justify not adopting the TSTF-8, Rev. 1 change to the SR 3.0.1 Bases. In addition, NMP2 has further reviewed the changes to the SR 3.0.1 Bases made by TSTF-8, Rev. 1, and has concluded that the changes can be adopted without adding confusion to or creating a potential inconsistency with the Section 3.8 SR Notes. Therefore, NMP2 will also revise the ITS SR 3.0.1 Bases to adopt the first two sentences of the TSTF-8, Rev. 1 change to the SR 3.0.1 Bases.

SECTION 3.5, ECCS

3.5.1.-1 *CTS 4.5.1.b & 4.5.2.1*
DOC 3.5.1-A.5
ITS SR 3.5.1.4 & SR 3.5.2.5
JFD 1

CTS 4.5.1.b (sic) and 4.5.2.1 require the ECCS pumps to develop a specified flow rate against a test line pressure specified as a gauge pressure value (psig). ITS SR 3.5.1.4 and SR 3.5.2.5 require the ECCS pumps develop the same specified flow rate against a "total developed head" specified as a differential value (psid). STS SR 3.5.1.4 requires the ECCS pumps develop the specified flow rate against a system head corresponding to the specified reactor pressure.

Comment: JFD 1 is generic and indicates that the ITS values are proper plant-specific values, although this is not immediately apparent. The ITS does not use either the CTS wording or the STS wording for this surveillance. In addition, it doesn't appear that the ITS Bases have been revised to reflect this proposed change. Either retain the CTS or STS wording for this surveillance and provide corresponding Bases or explain the need for the proposed revised wording and provide corresponding Bases. While DOC A.5 explains what was done in the proposed change, it does not explain why it was done. In addition, the staff notes that you did not use the same proposed wording for the identical SRs in ITS SRs 3.5.3.3 and 3.5.3.4; please explain why.

NMPC Response:

Total developed head (in psid) is a better indicator of pump performance than specifying a test line pressure (in psig), which is essentially pump discharge pressure. In addition, the pump discharge pressure is affected by suppression pool water level and suppression chamber pressure, since both of these parameters affect the suction pressure. Theoretically, a marginal pump can pass the SR when the acceptance criteria are expressed as a pump discharge pressure due to either a higher suppression pool water level or a higher suppression chamber pressure, even though the pump may not be able to develop the required head to inject the required flow into the reactor vessel at the assumed reactor vessel pressure. A SR with the acceptance criteria expressed in terms of "total developed head" will not be affected by a changing suppression pool water level or suppression chamber pressure, and is consistent with the NMP2 ASME Section XI Inservice Testing (IST) Program acceptance criteria. DOC A.5 will be modified to provide this clarifying description. In addition, the Bases for ITS SR 3.5.1.4 will be modified to more accurately reflect the acceptance criteria units (i.e., total developed head in lieu of pump outlet pressure).

In general, wherever possible, NMP2 tried to maintain the wording of the STS. For the Reactor Core Isolation Cooling (RCIC) surveillance, both CTS and STS required a minimum pump flow against a given vessel pressure. There is no ambiguity in the CTS and STS wording for RCIC, and therefore, there was no need to change the wording. This was corrected for the Emergency Core Cooling System (ECCS) pumps using as much of the STS wording as possible.

SECTION 3.7, PLANT SYSTEMS

3.7.1-1 ITS SR 3.7.1.2, Service Water System and Ultimate Heat Sink (UHS)

Comment: The 233.1 ft of the SR does not have a reference for the level. The Applicable Safety Analysis on Bases page B 3.7-3 also fails to specify the reference for the level. However, the LCO discussion on Bases page B 3.7-4 indicates the reference as mean sea level; that should be included in the SR.

NMPC Response:

NMP2 did not place a reference to the mean sea level in the Bases for SR 3.7.1.2 since the STS Bases for SR 3.7.1.2 did not reference the actual value of the water level limit required by STS SR 3.7.1.2. The mean sea level was placed in the LCO Bases, which is the location where the STS Bases identify the water level limit value. However, to provide additional clarification, the ITS SR 3.7.1.2 Bases will be modified to include both the water level limit value and the mean sea level reference.

3.7.2-2 ITS 3.7.2 LCO Bases, Control Room Envelope Filtration (CREF)

Comment: The Bases section has been modified to correlate the operability of the outside air vents to main steam valve leakage rates. This is not part of the CTS. Further, the leakage rate specified in the Bases is inconsistent with the leakage rate of ITS SR 3.6.1.3.12 (sic). If two vents are required at 15 scfh of leakage, that should be specified in a specification. Additionally, if two vents are required under certain circumstances, how is that consistent with FSAR Section 9.4.1.2 which describes each vent as having 100% capacity? Finally, the Bases discusses "effective" MSIV leakage, a term which is not defined in the ITS and does not exist in the CTS.

NMPC Response:

Based on the recent identification of a discrepancy in one of the calculations affecting this response, NMPC will provide its response to this question by August 19, 1999.

3.7.2-3 ITS 3.7.2 Bases Background

*Comment: The Background section of the ITS 3.7.2 Bases states that each CREF subsystem now consists of a CROASFT train and two air handling units (fan portions only), one for the control room and one for the relay room. Previously, a CROASFT train included the control room chiller subsystems as indicated by CTS footnote *. The chillers are now considered as*

part of ITS 3.7.3 which is described in the ITS 3.7.3 LCO Bases (page B 3.7-22) and also includes the air handling units.

a. *Was it intended that air handling units be covered by both ITS LCOs?*

b. *Why is placing the testing in the Bases of SR 3.7.2.1 and .4 (sic) sufficient?*

c. *Is similar testing needed under ITS 3.7.3 to assure the air handling units maintain design temperatures?*

d. *The CROASFT is in the CTS and is specifically discussed in FSAR section 9.4.1.2.2. The CREF which is in the ITS and is somewhat more than the CROASFT is not discussed in the FSAR or CTS. Similarly, while the Main Control Room Elevation HVAC is discussed in FSAR section 9.4.1.2.1 and the Relay Room Elevation HVAC is discussed in FSAR section 9.4.1.2.3, the Control Room Envelope AC system of ITS 3.7.3 is not discussed in the FSAR. Is everything accounted for in the ITS? Are there overlaps besides the air handling units? Shouldn't systems found in the TS be discussed in the FSAR?*

NMPC Response:

a. The air handling units (fan portions only) are necessary to maintain the required pressurization limit (1/8 inch positive pressure) in the control room envelope. This is described in the Background Section of ITS 3.7.2 Bases. The air handling units (cooling coil and fan portions only) are also necessary to provide the proper cooling to the control room envelope atmosphere. This is also described in the Background Section of the Bases. Therefore, the fan portion of an air handling unit is required by both the Control Room Envelope Filtration (CREF) System and the Control Room Envelope AC System. If the fan portion is inoperable, both the associated CREF subsystem and Control Room Envelope AC subsystem is inoperable, and associated ACTIONS in both ITS 3.7.2 and 3.7.3 are required to be taken. In addition, it was noted that the USAR normally uses the term "air conditioning units" in lieu of the term "air handling units." Therefore, the Bases for ITS 3.7.2 and ITS 3.7.3 will be modified to reflect this normal USAR terminology. In addition, in all further RAI discussions provided below, the term "air conditioning units" is used in lieu of "air handling units."

b. ITS SR 3.7.2.1 requires operating a CREF subsystem for 10 hours. The NMP2 design requires that certain portions of the CREF System, the air conditioning unit fans, be in operation under normal conditions. Since fans are normally running in two different areas of the control room envelope, it is possible for fans in two different subsystems to normally be in operation. Since the SR requires that each subsystem be operated for 10 hours, the Bases were clarified that it was not necessary to run all components of a given subsystem simultaneously for the 10 hours; each required air conditioning unit

fan and the CROASFT of a subsystem can be run separately, provided they are all run for at least 10 hours. ITS SR 3.7.2.4 requires a verification that all combinations of the CREF System can maintain a positive pressure in the control room envelope of ≥ 0.125 inches water gauge. As described above, it is possible for fans in two different subsystems to normally be in operation prior to the start of an accident. Thus, when an accident occurs, the final running combination of air conditioning unit fans may encompass both subsystems. Therefore, a Bases statement was added to SR 3.7.2.4 that all combinations of the CREF System must be verified, and that this verification can be performed by determining (by test) the worst combination of air conditioning units, then by testing this worst combination with each CROASFT. This will ensure that the design basis of the CREF System is met. Neither SR 3.7.2.1 nor SR 3.7.2.4 specifically require all components of a subsystem to be run concurrently. It just requires a 10 hour run for each subsystem (for SR 3.7.2.1) or a verification that each subsystem can maintain the assumed positive pressure. In addition, there are no restrictions in ITS SR 3.0.1 through SR 3.0.4 requiring Surveillance Requirements to be performed in one continuous step. Therefore, since there are no restrictions requiring performance of a Surveillance Requirement in a whole step, the description as to how the Surveillance can be performed should remain in the Bases.

c. During the development of the ITS submittal, it was noted that the Bases of SR 3.7.3.1 requires that the "system" (e.g., the Control Room Envelope AC system) capability to remove the heat load assumed in the safety analysis be verified. This can be done by verifying that each component in the system (i.e., the air conditioning units and the chillers) is capable of removing its individual design heat load. The calculations for the individual design heat loads would encompass and bound the varying system operating configurations. Therefore, similar testing is not explicitly required under ITS 3.7.3, since it is implicitly covered by the component calculations and tests. As such, there is no need to describe all the combinations (i.e., the word "system" is all inclusive).

d. The term CROASFT, as used in CTS LCO 3.7.3, can be misconstrued to be referring to the actual filter train only. However, the CROASFTs are only a part of the control room habitability system that is required to filter the control room envelope air and maintain the control room envelope pressurized. The ITS use of the term CREF System is a new acronym, and is used to be more precise and accurate as to what the ITS LCO requires. The CTS LCO requires the CROASFTs, but in actuality, more than just the CROASFTs are required. As described in the ITS Background and LCO Sections of the Bases, the CREF System includes not only the CROASFTs, but also the outside air intakes, the fan portions of the air conditioning units, and the necessary ductwork and valves. In the CTS, NMP2 currently requires all these additional components to be OPERABLE for the CROASFTs to be considered OPERABLE. Similarly, the CTS LCO requires the control room chiller subsystems to be OPERABLE. The chiller subsystems are also a part of the system required to cool the control room envelope. The ITS use of the term Control Room Envelope AC System is a new acronym, and is used to be more precise and accurate as to what the ITS LCO

requires. The Bases for ITS 3.7.3 describes the components necessary for OPERABILITY of the Control Room Envelope AC System, and includes not only the control room chilled water subsystems, but also the air conditioning units, ductwork, valves, and instrumentation and controls. While these acronyms are not used in the USAR, the actual portions of the systems are described in USAR, Sections 6.4 and 9.4.1, and these USAR sections are referenced in the ITS Bases for both ITS 3.7.2 and 3.7.3. NMP2 has reviewed the Bases descriptions for the CREF and Control Room Envelope AC Systems and confirmed that they are accurate and include all relevant components, consistent with the STS framework. However, it was noted that, in the Bases description of the chilled water subsystems, there could be some confusion as to the total number of subsystems and their lineup with respect to which air conditioning units they provide cooling to. Therefore, clarification will be provided in the Bases.

In addition to the fan portions of the air conditioning units, portions of the ductwork, and some valves, instrumentation, and controls are common between the two Systems.

3.7.2-4 ITS 3.7.2 Bases Background and Applicable Safety Analyses

Comment: In the Bases discussions on ITS page B 3.7-12, the STS language is modified to indicate that it is not a design requirement to provide for 30 days continuous occupancy of the control room post-accident. Note however, on page B 3.7-21 in discussion of the Applicable Safety Analysis for ITS 3.7.3, continuous occupancy is apparently a design requirement for that system. Similarly, on ITS pages B 3.7-13 and B 3.7-21 the STS language was modified to indicate that it is not a design requirement for the systems to be able to sustain a single passive failure. What are the technical/licensing bases for these changes?

NMPC Response:

The statement in the STS Bases is "The [CRFA] System is designed to maintain the control room environment for a 30 day continuous occupancy after a DBA, without exceeding a 5 rem whole body dose or its equivalent to any part of the body." While the NMP2 CREF System design is adequate to allow continuous (i.e., considering the occupancy factors of Standard Review Plan Table 6.4-1) control room occupancy for 30 days, it is not adequate to allow an individual continuous occupancy (i.e., 24 hours times 30 days) of the control room for 30 days without exceeding the 5 rem limit. Therefore, NMP2 deleted the word "continuous." This statement in the STS Bases is essentially paraphrased from 10 CFR 50, Appendix A, GDC 19. In lieu of deleting the word "continuous," NMP2 will change the statement to read "The CREF System is designed to maintain the control room envelope environment for a 30 day continuous occupancy (i.e., considering the occupancy factors of Standard Review Plan Table 6.4-1) after a DBA, while limiting the dosage to personnel to not more than 5 rem whole body or its equivalent to any part of the body." These words maintain the "continuous" requirement, but do not result in the same interpretational concerns described above.

The NMP2 CREF and Control Room Envelope AC Systems were not designed to withstand a single passive failure, only a single active failure. Some of the ductwork in the each of the systems is common to both subsystems in each system; a failure in the ductwork would result in loss of both subsystems of a system. This commonality of ductwork is identified in the Updated Safety Analysis Report (USAR), Figure 9.4-1 as referenced in Section 9.4.1, which describes the CREF and Control Room Envelope AC Systems. This USAR Section is referenced in the USAR, Section 6.4, which describes the control room habitability system and how it meets the design requirements. The NRC SER accepting the NMP2 design (NUREG-1047, dated February 1985), stated in Section 6.4 (page 6-38) that "The applicant has stated in FSAR Section 6.4 that the control room ventilation systems are designed to conform to single-failure...criteria." In the same section, the SER further has a statement that there is common ductwork. Thus it is clear that the term single-failure did not apply to passive failures, since the common ductwork can only fail passively, not actively. Furthermore, NUREG-0800 (USNRC Standard Review Plan), Section 6.4, Control Room Habitability System, part II.2 (page 6.4-3), provides a definition of single failure as it relates to the ventilation system. It states only that active failures should not result in loss of the system's functional capability, and that the filter train itself is to be considered an active component. NUREG-0800, Section 9.4.1, Control Room Area Ventilation System, part I.1.a, also states that a single active failure cannot result in loss of the system functional performance capability. The NMP2 design can withstand an active single failure, including a failure of a filter train. This single failure criterion was the criterion the NMP2 CREF and Control Room Envelope AC Systems were designed to meet.

SECTION 5.0, ADMINISTRATIVE CONTROLS

5.2-01 *DOC A.6*
CTS 6.2.4
ITS 5.2.2.g
STS 5.2.2.g
JFD 6

CTS 6.2.4 and STS 5.2.2.g have been changed to revise wording from "Shift Supervisor" to "operating shift" in the context of to whom the STA shall provide advisory technical support. As per NUREG-0737, the STA should have clear lines of reporting and communication with the Shift Supervisor. DOC A.6 explains the change as being acceptable because there may be multiple instances of supervision in the control room. DOC A.6 also states that "This includes the Station Shift Supervisor and the ASSS, both of whom are members of the operating shift." This change may include these two positions but is not clearly limiting the reporting to only them.

Comment: Revise the submittal to either include the STS wording for this instance or modify CTS/STS/DOC to explicitly outline site specific STA requirements as it relates to NUREG-0737.

NMPC Response:

The CTS currently requires the Shift Technical Advisor (STA) to provide advisory technical support to the "Shift Supervisor." This term for whom the STA supports was derived from the generic term provided in NUREG-0737. At NMP2, both an "Assistant Station Shift Supervisor (ASSS)" and a "Station Shift Supervisor (SSS)" are on the operating shift, and both hold senior operator licenses, as required by the CTS. The USAR does not provide any clarification as to which of these two supervisors the CTS is referring to, since it uses ASSS, SSS, and shift supervisor somewhat interchangeably when discussing the STA role. Normally, the STA would provide support to the ASSS, since the ASSS is normally the control room supervisor. However, when the ASSS is not in the control room, the SSS would assume the control room supervisor duties. Thus the STA could provide support to either the SSS or the ASSS at the start of an event, depending upon who was in charge of the control room. NMP2 agrees that use of the term "operating shift" does not limit the STA reporting requirement to only the necessary personnel. Therefore, the ITS will be modified to require the STA to provide support to the "shift supervision." JFD 6, DOC A.6 and the CTS markup will be modified to reflect this change.

5.5-02 *ITS 5.5.4*
STS 5.5.4

The STS/ITS 5.5.4 "Radioactive Effluent Control Program" has been changed to partially adopt parts of TSTF 258 Rev.3. Part of TSTF 258 Rev.3 has been omitted in the editing process. This part includes reference to the provisions to SR 3.0.2 and SR 3.0.3.

Comment: Revise the submittal to include all of TSTF 258 Rev.3.

NMPC Response:

The submittal will be revised to conform with TSTF-258, Rev. 3. It should be noted that NMP2 submitted the ITS amendment prior to the date TSTF-258, Rev. 3 was submitted to the NRC.

5.5-03 *DOC None*
CTS 4.6.5.3.b
JFD 12
ITS 5.5.7
STS 5.5.8 Insert 5.5.7-A

STS 5.5.7 Insert 5.5.7-A is essentially consistent with CTS 4.6.5.3.b as edited to fit the ITS. The word "significant" has been added to describe at what point to perform certain tests. This term was not used in the CTS and there is not discussion of change for the less restrictive change.

Comment: Revise the submittal to either not use the phrase "significant" or provide less restrictive discussion for this change in the CTS.

NMPC Response:

Adding the term "significant" is not a less restrictive change. Current NMP2 practice is that not all painting, fire or chemical release results in the need to perform certain ventilation tests. Only painting, fire or chemical release that could affect the ventilation filter trains (i.e., that which is significant) would necessitate performance of ventilation testing. The word "significant" was added for clarity and consistency with current practice to avoid a misinterpretation that any painting, fire or chemical release (such as using a small can of paint to do touch-up work in the reactor building) would result in the need to perform the tests. This clarification is administrative, and is consistent with the most recently approved BWR/5 ITS amendment, Washington Public Power Supply System (WNP-2). The WNP-2 ITS

amendment also administratively added the word "significant." In addition, the NRC, in a letter to Entergy Operations, Inc., dated September 11, 1997, supported the clarification that not all painting, fire or chemical release required the filter trains to be tested. In the NMP2 submittal, the administrative change is covered by DOC A.1, which is a generic administrative DOC justifying numerous editorial, reformatting, and numbering changes. For clarity, a specific administrative DOC (and appropriate CTS markup) will be provided for this change.

5.5-04 ***DOC None***
CTS 4.6.5.3/4.7.3
JFD 8
ITS 5.5.7.e
STS 5.5.8.e

ITS 5.5.7.e uses the additional term "nominal" in reference to the "value specified below..." JFD 8 states that this change has been done to ensure that the proper plant specific information/nomenclature is correctly provided. CTS 4.6.5.3 and CTS 4.7.3 does not use the term.

Comment: Either remove the term "nominal" or provide discussion of change to justify this change in the CTS and the STS.

NMPC Response:

NMPC is reevaluating the use of the word "nominal" and its current practice for verifying that the heaters dissipate the appropriate kW value. A response to this question will be provided by July 30, 1999.
