



THE UNIVERSITY OF CHICAGO



Richard B. Abbott
Vice President
Nuclear Engineering

Phone: 315.349.1812
Fax: 315.349.4417

August 27, 1999
NMP2L 1893

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) Section 3.3 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 letter dated June 16, 1999, the NRC requested additional information pertaining to our Application for Amendment. Specifically, the Staff requested information regarding Section 3.3, titled "Instrumentation."

Attached to this letter are the requested NMPC responses.

Very truly yours,

Richard B. Abbott
Vice President Nuclear Engineering

RBA/TWP/kap
Attachment

031073

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Mr. S. S. Bajwa, Section Chief PD-I, Section 1, NRR
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. D. S. Hood, Senior Project Manager, NRR
Mr. John P. Spath
NYSERDA
286 Washington Avenue Ext.
Albany, NY 12203-6399

Records Management

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**REQUEST FOR ADDITIONAL INFORMATION (RAI)
IMPROVED TECHNICAL SPECIFICATIONS (ITS)
NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION UNIT NO. 2**



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RAI 3.3.1.1-1:
ITS LCO 3.3.1.1
CTS Table 3.3.1-1 Footnote 1
DOC A.11, JFD 9

***Comment:** The ITS proposes "3 required APRM channels per logic channel per trip system." The CTS requires 3 APRM channels per trip system as modified by Note (1) that states the 3 APRM channels represent the total APRM channels, not channels per trip system basis. The staff position is that use of a "per logic channel per trip system" notation may result in misinterpretations of or confusion in understanding TS requirements. Revise ITS Table 3.3.1.1-1 Required Channels per Trip System column to require 3 APRM channels. The details of CTS footnote (1) may be relocated to the Bases or included in a footnote to Table 3.3.1.1.*

NMPC Response:

Current Technical Specifications (CTS) Table 3.3.1-1 Functional Units 2.a through 2.d require 3 Average Power Range Monitor (APRM) channels per trip system. However, this is modified by footnote 1 which states that the APRM channels are not on a trip system basis, but are the total number of APRMs required. Maintaining the CTS format but putting the Note in the Bases is not correct, since the Bases cannot technically change the Technical Specification (TS) requirement. That is, if Improved Technical Specifications (ITS) Table 3.3.1.1-1 Functions 2.a through 2.d state that three APRM channels per trip system are required to be OPERABLE, the Bases cannot change the requirement to be three total APRM channels are required to be OPERABLE. The ITS format is that each input is considered a channel. In addition, it is not inconsistent with the ITS format to further subdivide the number of channels in a trip system (e.g., as in Improved Standard Technical Specifications (ISTS) Table 3.3.1.1-1 Function 12 and ISTS Table 3.3.6.1-1 Function 1.c). As described in the Bases for ITS 3.3.1.1 for the four associated APRM Functions (ISTS Bases markup pages B 3.3-7 through 11), the APRM system is divided into 4 APRMs, each providing an input into both trip systems via the 2-out-of-4 voter channels. Each APRM inputs into all four 2-out-of-4 voter channels, with each APRM input into a 2-out-of-4 voter channel considered a channel. Thus, there are a total of 16 APRM channels each for Functions 2.a through 2.d, with eight channels per trip system and four channels per logic channel. Nine Mile Point Unit 2 (NMP2) has reviewed the ITS wording and the Bases description for the APRM Functions and does not believe it to be confusing, nor could it result in misinterpretations, after routine training is performed. Therefore, no changes to the ITS are necessary.

RAI 3.3.1.1-2:
ITS LCO 3.3.1.1
DOC A.4, JFD 7

***Comment:** Note 4 to ITS SR 3.3.1.1.16 modifies the Response Time Testing requirement for Function 9, Turbine Control Valve Fast Closure, Trip Oil Pressure - Low by stating that the*



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response time is measured from the start of the control valve fast closure, not when the sensor (oil pressure sensor) exceeds its setpoint. JFD 7 justifies this STS deviation based on a previous revision of the CTS which included a tabular listing of this allowance. Add discussion to JFD 7 to explain that the basis for this deviation from STS is to take exception to the RPS Response Time definition for determining the time interval for turbine control valve fast closure instrument response time measurement. The staff acceptance review of the proposed note will be performed as part of its review of topical report NEDO-32291 for implementation in NMP2 ITS.

NMPC Response:

Justification for Deviation (JFD) 7 will be modified to state that the Note is needed to take an exception to the definition of Reactor Protection System (RPS) Response Time. In addition, NMP2 believes that this issue is not related to the NRC accepting NEDO-32291 for implementation into the NMP2 ITS. This Note allowance is consistent with the NMP2 current licensing basis. As stated in Discussion of Change (DOC) A.4, the Note was removed from the CTS when the response time table was relocated to the Updated Safety Analysis Report (USAR) (TS Amendment No. 73). This note allowance was relocated to the USAR with the table. For consistency with the ITS format, NMP2 proposed to add the note back into the TS.

RAI 3.3.1.1-4:
ITS LCO 3.3.1.1
CTS 4.3.1.1
DOC LA.2

Comment:

- 1) *DOC LA.2 states the details are not necessary to ensure OPERABILITY of the RPS Instrumentation. Note (f) and Note (h) are CTS requirements to include the flow input function in periodic testing of the APRM channels as specified in the CTS Channel Functional Test (semi-annual) and Channel Calibration (refueling). The NUMAC-PRNM upgrade SE requires operability of the flow input function (page 13). JFD 3 is used to justify deleting STS SR 3.3.1.1.3 which is the adjustment of the APRM channels to conform to a calibrated flow signal. Provide additional justification for Table 4.3.1-1 notes (f) and (h) that explains why this CTS requirement can be deleted without an impact to safe operation of the plant. Revise the ITS to require calibration and testing of the flow input function.*
- 2) *Note (b) requirements for a ½ decade overlap is deleted without sufficient justification. Provide additional justification that explains why this CTS requirement can be deleted without an impact to safe operation of the plant.*



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NMPC Response:

- 1) JFD 3 is incorrect in that it states that the current test frequency for the flow unit is 7 days and that it is being extended to 92 days. The current frequency is 184 days in accordance with CTS Table 4.3.1.1-1 item 2.b. Footnote (h) provides clarification that this includes the flow input function. JFD 3 will be modified to correct these errors. As stated in the Bases for Function 2.b (Bases pages B 3.3-9 and Insert page B 3.3-9), the flow unit is considered part of the APRM Flow Biased Simulated Thermal Power-Upscale Function. Thus, when a Channel Functional Test or Channel Calibration Surveillance is required, the flow units are part of these two Surveillances. This is further emphasized in the Bases for the two Surveillances (Bases Insert page B 3.3-28 and B 3.3-29). Therefore, NMP2 believes that the ITS does require the flow units to be tested. However, DOC LA.2 will be revised for clarity.
- 2) The 1/2 decade overlap requirement was not deleted, but was relocated to the Bases. Additional justification will be provided in DOC LA.2.

RAI 3.3.1.1-5 (applies to multiple LCO DOCs):

ITS LCO 3.3.1.1

***CTS Table 2.2.1-1, (including footnote *) and CTS Table 3.3.1-1 Action 6, footnote *
DOC L.3***

Comment: Revise this DOC, DOC L.4 in ITS 3.3.8.2, DOC L.4 in ITS 3.3.8.3 and all other L.1 DOCs (except for LCOs 3.3.1.2, 3.3.3.1 and 3.3.7.1) in this submittal to delete the reference to Trip Setpoints as operational details that are not directly related to the OPERABILITY of the instrumentation.

NMPC Response:

The reference will be deleted from both the DOCs and the associated No Significant Hazards Evaluations (NSHEs).

RAI 3.3.1.2-1:

ITS LCO 3.3.1.2

CTS 3.9.2 and 4.9.2.a.2

DOC LA.2

Comment: Footnote ** to CTS 3.9.2 also includes "continuous visual indication" requirements. This operational constraint is deleted. Provide documentation for this proposed change.



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NMPC Response:

As stated in the ITS Bases (Background Section), the Source Range Monitors (SRMs) provide the operator with information relative to the neutron level at very low flux levels in the core. The ITS Bases (Limiting Condition for Operation (LCO) Section) also states that the SRMs are used to monitor reactor flux level prior to and during control rod withdrawal, to monitor subcritical multiplication and reactor criticality, and to monitor neutron flux levels and reactivity changes. This can only be met if there is continuous visual indication available. The definition of OPERABILITY in the ITS states that a system shall be OPERABLE when it is capable of performing its specified function. As such, this indication is necessary for the SRMs to be considered OPERABLE. DOC LA.2 states that the details for system OPERABILITY are not necessary in the LCO. The definition of OPERABILITY suffices. Therefore, NMP2 believes these two statements provide the necessary justification.

**RAI 3.3.1.2-2:
ITS LCO 3.3.1.2, JFD 2**

***Comment:** ITS 3.3.1.2 Required Action E.2 changes the STS Action to "initiate action to insert all insertable control rods ...", to "initiate action to 'fully' insert all insertable control rods ...". This editorial change is a generic deviation from the STS. The TSB staff policy for plants converting to the STS is to not consider proposed generic changes for implementation in the ITS until a staff approved TSTF is issued. However, the TSB staff will pursue licensee proposed generic changes which maintain safety, reduce unnecessary burden, increase efficiency or which increase effectiveness. When licensee proposed generic TS changes are documented to show a need, as described previously, to immediately revise the STS, then changes of these types will be considered for plant-specific approval on a parallel path with a proposed traveler. No response required at this time pending staff assessment of the acceptability of this justification for a plant-specific conversion TS change.*

NMPC Response:

A Technical Specification Task Force (TSTF) change has been provided to the Boiling Water Reactor Owners Group (BWROG) for consideration. NMP2 notes that this proposed change is consistent with the wording for the identical Required Action in the Boiling Water Reactor (BWR)/4 ISTS (NUREG-1433, Rev. 1).

**RAI 3.3.1.2-3:
ITS LCO 3.3.1.2,
DOC M.1, JFD 4**

***Comment:** SR 3.3.1.4 and SR 3.3.1.5 both require the determination of a signal to noise ratio to meet the surveillance requirement. The change proposes to copy the note from SR 3.3.1.4*

into SR 3.3.1.2.5 which defers determination of signal to noise ratio in Mode 5 if no fuel assemblies are adjacent to the SRM or no fuel is in the quadrant. This proposal is a generic deviation from the STS. The TSB staff policy for plants converting to the STS is to not consider proposed generic changes for implementation in the ITS until a staff approved TSTF is issued. However, the TSB staff will pursue licensee proposed generic changes which maintain safety, reduce unnecessary burden, increase efficiency or which increase effectiveness. When licensee proposed generic TS changes are documented to show a need, as described previously, to immediately revise the STS, then changes of these types will be considered for plant-specific approval on a parallel path with a proposed traveler. The staff believes that the addition of the note to SR 3.3.1.2.5 is not necessary because SR 3.3.1.5 is performed on a 7-day frequency in Mode 5 and SR 3.3.1.4 is performed on a 24-hour frequency in Mode 5.

NMPC Response:

Surveillance Requirement (SR) 3.3.1.2.4 does not require a determination of the signal to noise ratio. It only requires a verification that the count rate is within the appropriate limit. The 3.0 counts per second (cps) count rate is the limit if the signal to noise ratio is $\geq 2:1$ and the 1.3 cps count rate is the limit if the signal to noise ratio is $\geq 5:1$. The actual signal to noise ratio is determined by SR 3.3.1.2.5. Both SR 3.3.1.2.4 and SR 3.3.1.2.5 are required to be performed while in MODE 5. However, they are not required to be performed when the reactor is defueled. Thus, prior to the core being reloaded, the two SRs must be current. The Note to SR 3.3.1.2.4 allows the core reload to commence without SR 3.3.1.2.4 being met when there are less than or equal to four fuel assemblies adjacent to the SRM and no other fuel assemblies are in the associated core quadrant. SR 3.3.1.2.5 needs the same allowance for the signal to noise ratio determination requirement. Signal to noise ratio is normally determined by comparing the SRM count rate with the detector full in with the SRM count rate with the detector withdrawn. This cannot be performed with insufficient fuel assemblies loaded into the core. Thus, the allowance provided by the Note is needed. A TSTF has been provided to the BWROG for consideration.

RAI 3.3.2.2-1:
ITS LCO 3.3.2.2
CTS Table 3.3.9-1
DOC L.5, JFD 4

Comment: *CTS Table 3.3.9-1 Action 140 requires reduction in Thermal Power if the Feedwater System/Main Turbine High Water Level Trip Instrumentation is not restored to Operable status. An additional Required Action is proposed, ITS 3.3.2.2, Required Action C.1, to allow removal of the associated feedwater pump(s) from service in lieu of reducing Thermal Power. This Required Action will only be used if the instrumentation is inoperable solely due to an inoperable feedwater pump breaker, as stated in the Note to ITS 3.3.2.2 Required Action C.1. This change is a generic deviation from the STS. The TSB staff policy for plants converting to the STS is to not consider proposed generic changes for implementation in the ITS until a staff approved TSTF is issued. However, the TSB staff will*



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pursue licensee proposed generic changes which maintain safety, reduce unnecessary burden, increase efficiency or which increase effectiveness. When licensee proposed generic TS changes are documented to show a need, as described previously, to immediately revise the STS, then changes of these types will be considered for plant-specific approval on a parallel path with a proposed traveler. Revise the ITS to adopt STS.

NMPC Response:

In the ITS submittal, NMP2 stated that this change was a deviation from both our CTS and the ISTS (Attachment 3 to the NMP2 letter from J. T. Conway to the NRC, dated October 16, 1998). As such, NMP2 was notified by the Project Manager that this change would not be reviewed by the TS Branch, but would be reviewed as directed by the Project Manager. Therefore, NMP2 will await the completion of this review before making any changes, if necessary, to the submittal. It should also be noted that this change does reduce an unnecessary burden on NMP2. The ISTS requires reactor power to be reduced to less than 25% Rated Thermal Power (RTP) when the instrumentation is inoperable. However, if the instrumentation is inoperable only due to an individual feedwater pump breaker, NMP2 can operate at a reduced power level above 25% RPT with one feedwater pump and at full power with two feedwater pumps (NMP2 design includes three feedwater pumps).

**RAI 3.3.3.1-1:
ITS LCO 3.3.3.1
DOC L.1, JFD 4**

***Comment:** Proposed ITS SR Note 2 provides a 6 hour allowed outage time for surveillance testing. DOC L.1 and JFD 4 both provide discussion and justification for this allowance based on other nuclear station TS amendments and other topical reports. This 6-hour allowance does not maintain the current licensing basis but requests implementation of a generic less restrictive deviation from the STS. The TSB staff policy for plants converting to the STS is to not consider proposed generic changes for implementation in the ITS until a staff approved TSTF is issued. However, the TSB staff will pursue licensee proposed generic changes which maintain safety, reduce unnecessary burden, increase efficiency or which increase effectiveness. When licensee proposed generic TS changes are documented to show a need, as described previously, to immediately revise the STS, then changes of these types will be considered for plant-specific approval on a parallel path with a proposed traveler. Revise the ITS to adopt STS.*

NMPC Response:

In the ITS submittal, NMP2 stated that this change was a deviation from both our CTS and the ISTS (Attachment 3 to the NMP2 letter from J. T. Conway to the NRC, dated October 16, 1998). As such, NMP2 was notified by the Project Manager that this change would not be reviewed by the TS Branch, but would be reviewed as directed by the Project Manager. Therefore, NMP2 will await the completion of this review before making any changes, if



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necessary, to the submittal. It should also be noted that this change does reduce an unnecessary administrative burden on NMP2. In addition, this change has been previously approved by the NRC on a plant specific basis for the most recent BWR/5 ITS submittal. A TSTF change has also been provided to the BWROG for consideration.

RAI 3.3.3.1-2:
ITS LCO 3.3.3.1
CTS
DOC A.6

***Comment:** This DOC proposes IST testing changes included in a pending license amendment. This proposed allowance cannot be incorporated into ITS until the staff approves the change.*

NMPC Response:

This change was approved by the NRC in a letter from Darl S. Hood (NRC) to John H. Mueller (NMPC) dated December 3, 1998 (Amendment No. 84). An updated CTS markup page will be provided and the DOC A.6 deleted.

RAI 3.3.3.2-1:
ITS LCO 3.3.3.2
CTS 4.3.7.4.1
DOC A.3

***Comment:** DOC A.3 discusses a less restrictive CTS change. Provide an L-DOC to replace DOC A.3.*

NMPC Response:

The change related to the deletion of the requirement to perform a CHANNEL CHECK on deenergized instrumentation was submitted and categorized as an administrative change consistent with the NRC's review and approval of a previous BWR/4 ITS submittal (Brunswick Nuclear Plant Units 1 and 2). NMP2 understands that the NRC would prefer this change to be identified as less restrictive. Consistent with this current expectation, NMP2 will revise our submittal accordingly.

RAI 3.3.3.2-2:
LCO 3.3.3.2, JFD 2

***Comment:** Proposed ITS SR Note 2 provides a 6 hour allowed outage time for surveillance testing. DOC L.2 and JFD 2 both provide discussion and justification for this allowance based*



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on other nuclear station TS amendments and other topical reports. This 6-hour allowance does not maintain the current licensing basis but requests implementation of a less restrictive deviation from the STS. The TSB staff policy for plants converting to the STS is to not consider proposed generic changes for implementation in the ITS until a staff approved TSTF is issued. However, the TSB staff will pursue licensee proposed generic changes which maintain safety, reduce unnecessary burden, increase efficiency or which increase effectiveness. When licensee proposed generic TS changes are documented to show a need, as described previously, to immediately revise the STS, then changes of these types will be considered for plant-specific approval on a parallel path with a proposed traveler. Revise the ITS to adopt STS.

NMPC Response:

In the ITS submittal, NMP2 stated that this change was a deviation from both our CTS and the ISTS (Attachment 3 to the NMP2 letter from J. T. Conway to the NRC, dated October 16, 1998). As such, NMP2 was notified by the Project Manager that this change would not be reviewed by the TS Branch, but would be reviewed as directed by the Project Manager. Therefore, NMP2 will await the completion of this review before making any changes, if necessary, to the submittal. It should also be noted that this change does reduce an unnecessary administrative burden on NMP2. In addition, this change has been previously approved by the NRC on a plant specific basis for the most recent BWR/5 ITS submittal. A TSTF change has also been provided to the BWROG for consideration.

RAI 3.3.4.2-1:
ITS LCO 3.3.4.2
DOC M.2, JFD.4

Comment: *This DOC proposes to add additional verification of ATWS trip function bypass and time delays. This proposed allowance cannot be incorporated into ITS until the staff approves the change.*

NMPC Response:

The NMP2 design includes bypass features for the low frequency motor generator trip of the Anticipated Transient Without Scram-Recirculation Pump Trip (ATWS-RPT) breakers on a Reactor Vessel Steam Dome Pressure-High signal. Currently, there are no specific TS setpoint requirements for these features. NMP2 added these new SRs (ITS SR 3.3.4.2.4 and ITS SR 3.3.4.2.5) into the ITS to be consistent with other similar ITS SRs for instrumentation that has bypass features (e.g., ITS SR 3.3.4.1.4).



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RAI 3.3.4.2-2:
ITS LCO 3.3.4-2
CTS 3.3.4.1
DOC L.3

Comments: 1) Revise paragraph b), it does not clearly identify all proposed CTS changes.
2) Revise paragraph c) to clarify the phrase "functionally equivalent."

NMPC Response:

The two paragraphs will be revised to more clearly state the changes being made.

RAI 3.3.4.2-3:
ITS LCO 3.3.4.2
JFD 2, L.4

Comment: The NMP2 design includes both fast speed and slow speed breakers for the recirculation pumps. The licensee stated that if the ATWS-RPT instrumentation is inoperable solely due to one of the breakers, only the inoperable breaker needs to be removed from service to complete the safety function, not the entire recirculation pump. If both breakers are affected, then both will continue to be required to be removed from service, consistent with the STS Required Action.

This change does not maintain the current licensing basis but requests implementation of a less restrictive deviation from the STS. The TSB staff policy for plants converting to the STS is to not consider proposed generic changes for implementation in the ITS until a staff approved TSTF is issued. However, the TSB staff will pursue licensee proposed generic changes which maintain safety, reduce unnecessary burden, increase efficiency or which increase effectiveness. When licensee proposed generic TS changes are documented to show a need, as described previously, to immediately revise the STS, then changes of these types will be considered for plant-specific approval on a parallel path with a proposed traveler. Revise the ITS to adopt STS.

NMPC Response:

In the ITS submittal, NMP2 stated that this change was a deviation from both our CTS and the ISTS (Attachment 3 to the NMP2 letter from J. T. Conway to the NRC, dated October 16, 1998). As such, NMP2 was notified by the Project Manager that this change would not be reviewed by the TS Branch, but would be reviewed as directed by the Project Manager. Therefore, NMP2 will await the completion of this review before making any changes, if necessary, to the submittal. It should also be noted that this change does reduce an unnecessary burden on NMP2. If only one of the pump breakers are affected, the ISTS would require the pump to be removed, even though it could be safely operated using the remaining breaker.



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RAI 3.3.5.1-1:
ITS LCO 3.3.5.1
CTS Table 3.3.3-1
DOC A.7

***Comment:** CTS Action 35 requirements for inoperable ADS Trip System "A" or "B" manual initiation channels are correctly characterized in DOC A.7 discussion as requiring the associated ADS Valve (emphasis added) to be declared inoperable if the 24 hour restore period expires. However, A.7 then states that CTS 3.3.3 requires Action c to be taken, which is to declare the ADS Trip System "A" or "B" inoperable within a specified 72 hour or 7-day period. The staff position is that CTS do not require entry into CTS 3.3.3 Action c for ADS Valves declared inoperable, rather CTS 3.5.1, ECCS-Operating" applies and the associated ECCS Division is declared inoperable. Provide an L-DOC for changes to CTS requirements resulting from adopting STS repair time requirements vice entering CTS 3.5.1 actions for ADS Valve declared inoperable.*

NMPC Response:

An L DOC will be provided for this change.

RAI 3.3.5.1-2:
ITS LCO 3.3.5.1
CTS Table 3.3.3-1
DOC L.5

***Comments:** 1) DOC L.5 states that ITS Action F will allow 24 hours to place a channel in trip. Provide additional explanation. 2) DOC L.5 states that the channels for the LPCS, LPCI, and ADS Functions are combined in a two-out-of-two logic. The Bases states that Level and Drywell Pressure are one out-two-twice logics. Provide additional explanation. 3) L.5 discusses multiple CTS changes. Revise L.5 to show paragraph breaks.*

NMPC Response:

- 1) ITS 3.3.5.1 ACTION F allows a 96 hour or 8 day time to trip the channels, depending upon whether or not both High Pressure Core Spray (HPCS) and Reactor Core Isolation Cooling (RCIC) Systems are Operable. DOC L.5 and the associated NSHE will be corrected.
- 2) As stated in the Background Section of the Bases, for each low pressure emergency core cooling system (ECCS) Division, the two channels of the Drywell Pressure-High Function and the two channels of the Reactor Vessel Water Level-Low Low Low, Level 1 Function are combined into a one-out-of-two taken twice logic. However, individually, both channels of an individual Function must trip for the ECCS Division



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to actuate on that Function, i.e., a two-out-of-two logic. This is the meaning of the statement made in DOC L.5. The DOC will be modified to more clearly state that the logic description is on an individual Function basis.

- 3) DOC L.5 will be revised to show paragraph breaks.

RAI 3.3.5.1-3:
LCO 3.3.5.1, JFD 9

Comment: ITS Table 3.3.5.1-1, footnote (a) is changed from the STS to include a citation of LCO 3.5.2. This proposal requests implementation of a generic deviation from the STS. The TSB staff policy for plants converting to the STS is to not consider proposed generic changes for implementation in the ITS until a staff approved TSTF is issued. However, the TSB staff will pursue licensee proposed generic changes which maintain safety, reduce unnecessary burden, increase efficiency or which increase effectiveness. When licensee proposed generic TS changes are documented to show a need, as described previously, to immediately revise the STS, then changes of these types will be considered for plant-specific approval on a parallel path with a proposed traveler. Revise the ITS to adopt STS.

NMPC Response:

CTS Table 3.3.3-1 footnote * states, "When the system is required to be OPERABLE per Specification 3.5.2 or 3.5.3." Therefore, while addition of the citation of ITS 3.5.2 to ITS Table 3.3.5.1-1 footnote (a) may be a generic change, it is also consistent with current licensing basis. This is stated in JFD 9. Therefore, NMP2 believes the change should be allowed.

RAI 3.3.5.1-4:
ITS LCO 3.3.5.1
CTS
DOC L.3, A.4, L.6, A.11, M.5 and M.6

Comment: DOC L.3 proposes an ADS pressure setpoint of 150 psig. DOC A.4 proposes implementation of topical report NEDC-32291. DOCs L.6, A.11, M.5 and M.6 propose changes associated with moving Group 4 isolation valves into the ECCS TS in ITS. These proposed allowances cannot be incorporated into ITS until the staff approves them.

NMPC Response:

No response appears to be necessary at this time.



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RAI 3.3.5.2-1:
ITS LCO 3.3.5.2
DOC M.2

***Comment:** The portions of CTS Action 50.a that allows a trip system to be tripped in place of a channel trip is deleted without justification. Provide an appropriate A-DOC discussion of change evaluation.*

NMPC Response:

The change related to the deletion of the requirement in CTS Table 3.3.5-1 Action 50.a to place a trip system in trip was submitted and categorized as a generic administrative change (i.e., covered by the generic A.1 DOC in ITS 3.3.5.2) consistent with the NRC's review and approval of the previous BWR/5 ITS submittal. NMP2 understands that the NRC would prefer this change to be identified with a specific administrative DOC. Consistent with this current expectation, NMP2 will revise our submittal accordingly.

RAI 3.3.6.1-1:
ITS LCO 3.3.6.1
CTS Table 3.3.2-1
DOC A.9

***Comment:** CTS 3.3.2 Action 22 requires the affected system isolation valves to be isolated in 1 hour and (emphasis added) Action 22 requires the affected system to be declared inoperable. ITS provide an option in Condition I required actions. This option is to declare the SLC System inoperable or (emphasis added) isolate the RWCU. Isolating the RWCU does not result in the SLC System becoming inoperable, thus there is a clear difference from CTS which results from choosing one ITS Action over the other. Provide a L-DOC to justify the proposed ITS to declare the SLC System inoperable.*

NMPC Response:

The change related to the option of declaring the Standby Liquid Control (SLC) System inoperable in lieu of isolating the Reactor Water Cleanup (RWCU) System was submitted and categorized as an administrative change consistent with the previous BWR/5 ITS submittal. NMP2 understands that the NRC would prefer this change to be identified as less restrictive. Consistent with this current expectation, NMP2 will revise our submittal accordingly.



RAI 3.3.6.1-2:
ITS LCO 3.3.6.1
CTS Table 3.3.2-1
DOC L.7

Comment: Revise DOC L.7 to provide additional discussion explaining why the addition of ITS actions G and H are "considered adequate."

NMPC Response:

Doc L.7 will be revised to provide additional justification.

RAI 3.3.6.1-3:
LCO 3.3.6.1, JFD 4

Comments:

- 1) CTS Table 3.3.2-1 requires "6" Channels Per Trip System for the Main Steam Line Tunnel Lead Enclosure Temperature - High Function. ITS Table 3.3.6.1-1 Insert 1.g changes this requirement to "2 per area." No discussion or justification is provided for the change. Provide missing documentation.
- 2) CTS Table 3.3.2-1 Minimum Operable Channels Per Trip System requirement for the RWCU Pump Room Temperature - High (Functions 1.j.1 and 1.j.2) is listed as "1". ITS Table 3.3.6.1-1 (Function 4.d) changes this requirement to "1 per room." It is not clear why this Operability requirement changed in the ITS. Provide a discussion of change for the CTS change.
- 3) CTS Table 3.3.2-1, Function, 1.k.1, 1.k.2, and 1.k.3, Reactor Bldg Pipe Chase Temperature - High Functions, are listed with respect to Reactor Bldg circumference in three locations: Azimuth 180 degrees (Upper and Lower) and Azimuth 40 degrees. These requirements are included in ITS Table 3.3.6.1-1 as Functions 3.h, 4.e, and 5.d; however, the requirements are identified with respect to 4 elevations. It is not clear that the locations are the same or why there are four locations instead of three. The CTS Table 3.3.2-1 "Minimum Operable Channels Per Trip System" requirement of either "1" or "2" is also changed in the ITS to "1 per area." There is no discussion or justification for the CTS changes. Provide discussion and justification for the CTS changes to include the noted missing information. Revise the Table to put these functions in standard format, by numbering each of the Areas as a Function.
- 4) CTS Table 3.3.2-1 Function 1.l, Reactor Building Temperature - High, Minimum Operable Channels per Trip System requirement of "5" is changed in ITS Table 3.3.6.1-1 Functions 3.i and 5.e to "1 per area". No discussion or justification is provided for the CTS change. Provide missing documentation.



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- 5) *CTS Table 3.3.2-1 Function 1.f, RHR Equipment Area Temperature - High (HX/A&B Pump Rooms) is changed in ITS Table 3.3.6.1-1 Function 5.a to "1 per room." No discussion or justification is provided for the change. Provide missing documentation.*

NMPC Response:

The changes related to identifying the number of channels based on a room or area in ITS Table 3.3.6.1-1 was submitted and categorized as a generic administrative change (i.e., covered by the generic A.1 DOC in ITS 3.3.6.1) consistent with the NRC's review and approval of the previous BWR/5 ITS submittal. NMP2 understands that the NRC would prefer these changes to be identified with a specific administrative DOC. Consistent with this current expectation, NMP2 will revise our submittal accordingly; however, a single A DOC will be used to identify all these changes. In addition, in response to the last sentence of part 3) of the RAI, NMP2 considers CTS Table 3.3.2-1 Function 1.k, Reactor Building Pipe Chase, one Function, not four Functions. Therefore, in ITS Table 3.3.6.1-1 it was listed as a single Function. This is consistent with the standard format. For example, ISTS Table 3.3.6.1-1 Functions 3.j, 3.k, 4.e, 4.f, 5.a, and 5.b require one channel per room per trip system. For each of these functions, the instruments monitor two rooms. However, the ISTS did not break up each of these functions into two functions, one covering the room and another covering the second room. The ISTS maintained each of these as a single function. Thus, NMP2 will maintain the Reactor Building Pipe Chase instrumentation as a single Function for each of the Systems it isolates (i.e., RCIC, RWCU, and Residual Heat Removal Shutdown Cooling (RHR SDC) Systems).

RAI 3.3.6.1-4:

ITS LCO 3.3.6.1

CTS

DOC R.1, M.3, M.5, L.6

Comment: *DOC R.1 proposes to delete the RCIC drywell pressure high isolation functions. DOCs M.3 and M.5 propose new RCIC/RHR Steam Flow Timer and SGT Exhaust Radiation High isolation function allowable values, respectfully. DOC L.6 proposes to delete the MSL Radiation high isolation function. These proposed allowances cannot be incorporated into ITS until the staff approves them.*

NMPC Response:

No response appears to be necessary at this time.



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RAI 3.3.6.2-1:
ITS LCO 3.3.6.2
CTS Table 3.3.2-1
DOC A.6

***Comment:** The term REACTOR BUILDING INTEGRITY as used in the CTS is not a defined term. Clarify DOC A.6.*

NMPC Response:

CTS Table 3.3.2-1 Action 27 uses the term REACTOR BUILDING INTEGRITY. This capitalized term is not defined in CTS Section 1.0, Definitions. NMP2 interprets this term to be synonymous with SECONDARY CONTAINMENT INTEGRITY. DOC A.6 used the phrase "(i.e., SECONDARY CONTAINMENT INTEGRITY)" after the term REACTOR BUILDING INTEGRITY to indicate that the two terms were identical. DOC A.6 will be modified to more clearly state that the two terms are synonymous.

RAI 3.3.6.2-2:
LCO 3.3.6.2, JFD 1

***Comment:** The ITS changes noted as "1" delete the reference to "secondary containment integrity." The changes are generic deviations from the STS. The TSB staff policy for plants converting to the STS is to not consider proposed generic changes for implementation in the ITS until a staff approved TSTF is issued. However, the TSB staff will pursue licensee proposed generic changes which maintain safety, reduce unnecessary burden, increase efficiency or which increase effectiveness. When licensee proposed generic TS changes are documented to show a need, as described previously, to immediately revise the STS, then changes of these types will be considered for plant-specific approval on a parallel path with a proposed traveler. Revise the ITS to adopt STS.*

NMPC Response:

A TSTF change was provided to the BWROG for consideration but was disapproved as a generic change. NMP2 notes that this proposed change is consistent with the wording for the similar ACTION in ISTS 3.3.6.1 of NUREG-1434, Rev. 1, and that the words "primary containment," which were in the ISTS 3.3.6.1 ACTION of NUREG-1434, Rev. 0, were deleted from the ACTION in ISTS 3.3.6.1 when NUREG-1434, Rev. 1 was issued. Therefore, to maintain consistency with the similar ACTION in ITS 3.3.6.1, and to avoid confusion as to why these two similar ACTIONS are worded differently, the NMP2 proposed wording should be maintained.



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RAI 3.3.7.1-1:
ITS LCO 3.3.7.1
CTS Table 3.3.7.1-1
DOC L.1

***Comment:** DOC L.1 states that CTS Table 3.3.7.1-1 Actions 74.b and 74.c require placing the CREF System in operation when two main control room ventilation radiation monitors in one or both trip systems are inoperable. DOC L.1 notes that LCO 3.0.3 applies if these actions are not met. The DOC then discussed deletion of the CTS shutdown requirement along with other changes that are not clearly identified. DOC L.1 does not clearly identify CTS changes that result from adopting the ITS nor are the justifications for the less restrictive changes clearly presented.*

NMPC Response:

DOC L.1 will be reworded to more clearly identify the CTS changes and more clearly present the justifications for the changes.

RAI 3.3.7.2-1:
ITS LCO 3.3.7.2
CTS 3.3.2
DOC M.1

***Comment:** If the main steam line radiation channel(s) are inoperable due to a breaker that will not open or a valve that will not close, placing the channels in the tripped condition, as required by CTS 3.3.2 Actions b.1, c.1, and c.2.a), will not accomplish the intended restoration of the functional capability. In order to address these concerns, ITS 3.3.7.2 Required Action A.1 is added to specify restoration of the inoperable channel(s) and a Note is added to Required Action A.2 which states that placing a channel in trip is not applicable if the inoperable channel is the result of an inoperable isolation valve or vacuum pump breaker. Revise DOC M.1 to provide additional discussion for the new note to Required Action A.2 and Action A.2 to justify how this Action and note will ensure functional capability of the mechanical vacuum pump isolation is restored. Include a discussion of the more restrictive changes to CTS requirements that result from Required Action A.2.*

NMPC Response:

DOC M.1 will be revised to more clearly describe and justify the more restrictive change.



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RAI 3.3.7.2-2:
ITS LCO 3.3.7.2
CTS
DOC L.2, A.2

***Comment:** DOCs L.2 and A.2 propose a new LCO for mechanical vacuum pump instrumentation. This change is related to the proposed deletion of the MSL radiation high insulation function in ITS 3.3.6.1. This proposed allowance cannot be incorporated into ITS until the staff approves the change.*

NMPC Response:

No response appears to be necessary at this time.

RAI 3.3.8.1-1:
ITS LCO 3.3.8.1
CTS Table 3.3.3-1
DOC L.2, LA.2, JFD 1, JFD 3

***Comment:** CTS Table 3.3.3-1 indicates that the total number of channels per bus are 3 channels per bus for each string of Loss of Power instrumentation per division (4160v). ITS Table 3.3.8.1-1 has revised the number of required channels per division to two from three. The TSB staff policy for plants converting to the STS is to not consider proposed generic changes for implementation in the ITS until a staff approved TSTF is issued. However, the TSB staff will pursue licensee proposed generic changes which maintain safety, reduce unnecessary burden, increase efficiency or which increase effectiveness. When licensee proposed generic TS changes are documented to show a need, as described previously, to immediately revise the STS, then changes of these types will be considered for plant-specific approval on a parallel path with a proposed traveler. Revise ITS Table 3.3.8.1 to show "3" as the required channels per Bus in the Required Channels per Division column for the Division I, Division II and Division III loss of voltage and degraded voltage trip function instrumentation. Revise the ITS to adopt STS Condition A.*

NMPC Response:

In the ITS submittal, NMP2 stated that this change was a deviation from both our CTS and the ISTS (Attachment 3 to the NMP2 letter from J. T. Conway to the NRC, dated October 16, 1998). As such, NMP2 was notified by the Project Manager that this change would not be reviewed by the TS Branch, but would be reviewed as directed by the Project Manager. Therefore, NMP2 will await the completion of this review before making any changes, if necessary, to the submittal. It should also be noted that this change is not a generic change, but is a plant specific change.



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RAI 3.3.8.1-2:
ITS LCO 3.3.8.1
CTS 4.3.3.1
DOC L.6, JFD 3

***Comment:** This change deletes a CTS requirement and the STS requirement for performing a channel check on the DG start instrumentation. The TSB staff policy for plants converting to the STS is to not consider proposed generic changes for implementation in the ITS until a staff approved TSTF is issued. However, the TSB staff will pursue licensee proposed generic changes which maintain safety, reduce unnecessary burden, increase efficiency or which increase effectiveness. When licensee proposed generic TS changes are documented to show a need, as described previously, to immediately revise the STS, then changes of these types will be considered for plant-specific approval on a parallel path with a proposed traveler. No response required at this time pending staff assessment of the acceptability of this justification for a plant-specific conversion TS change.*

NMPC Response:

This proposed change, which deletes the requirement for a Channel Check of the Loss of Power Instrumentation, is not a generic change. The Surveillance in the ISTS, SR 3.3.8.1.1, is already a bracketed SR, which means that it is acceptable not to include this SR in a plant specific ITS, if proper justification is provided. This justification is provided in DOC L.6.

RAI 3.3.8.1-3:
ITS LCO 3.3.8.1
CTS Table 3.3.3-1
DOC L.7, JFD 2

***Comment:** The STS allows a 2-hour delay from entering into the associated Conditions and Required Actions for a channel placed in an inoperable status solely for performance of required Surveillances provide the associated Function maintains DG initiation capability. This is changed in the ITS to "provide the associated Function maintains "LOP" initiation capability." This proposed change results in a generic deviation from the STS. The TSB staff policy for plants converting to the STS is to not consider proposed generic changes for implementation in the ITS until a staff approved TSTF is issued. However, the TSB staff will pursue licensee proposed generic changes which maintain safety, reduce unnecessary burden, increase efficiency or which increase effectiveness. When licensee proposed generic TS changes are documented to show a need, as described previously, to immediately revise the STS, then changes of these types will be considered for plant-specific approval on a parallel path with a proposed traveler. Revise the ITS to adopt STS 3.3.8.1, SR Note 2.*



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NMPC Response:

The ISTS Note uses the term "DG initiation capability," however, the title of the LCO is "Loss of Power Instrumentation." As stated in the Bases of the ISTS for this Specification, the instrumentation does more than just initiate the Diesel Generator (DG). The instrumentation sends a signal to the load shedding control scheme, which starts the associated DG, provides a closure signal to the DG output breaker, opens both offsite circuit supply breakers, and for Division 1 and 2 only, sheds loads on the 4.16 kilo volt (kV) emergency bus. As written in the ISTS, only the DG initiation portion of the logic needs to be functioning for the Note to be used. The ISTS allows the 2 hour allowance of the Note to be used if all other parts of the logic (i.e., the portions that open the offsite circuit breakers and shed loads) are not functioning. In addition, it is unclear if the term "DG initiation capability" means just starting the DG or if it also includes tying the DG to the associated emergency bus. To ensure the 2 hour allowance of the Note is only used when the Loss of Power (LOP) Instrumentation can initiate all required features, the words in the Note have been changed to "LOP initiation capability," consistent with the actual LCO title. Therefore, NMP2 believes these proposed words are more correct and will preclude use of the 2 hour allowance in the Note when it should not be used.

**RAI 3.3.8.2-1:
ITS LCO 3.3.8.2
DOC M.2**

Comment: *There is no CTS basis for a number of proposed ITS actions included in ITS Condition F. Replace DOC M.2 with an L-DOC. In the new L-DOC, include justification for adopting the less restrictive Actions proposed by F.1.2, F.2.2 and F.3.2.*

NMPC Response:

The change related to the addition of ACTIONS while not in MODE 1, 2, or 3 was submitted and categorized as a more restrictive change consistent with the NRC's review and approval of the previous BWR/5 ITS submittal. NMP2 understands that the NRC would prefer this change to be identified as less restrictive. Consistent with this current expectation, NMP2 will revise our submittal accordingly. In addition, while the RAI only addresses changing the designation for the addition of ACTION F from a more restrictive change to a less restrictive change, this same reasoning applies to the addition of ACTIONS D and E, as well as the addition of ITS 3.3.8.3 ACTION D. Therefore; for consistency, NMP2 will revise our submittal relative to all these ACTIONS.



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RAI 3.3.8.2-2:
LCO 3.3.8.2, L.3, JFD 8

Comment: The proposed ITS SR Note provides a 6 hour allowed outage time for surveillance testing. DOC L.3 and JFD 8 both provide discussion and justification for this allowance based on other nuclear station TS amendments and other topical reports. This 6 hour allowance does not maintain the current licensing basis but requests implementation of a less restrictive generic deviation from the STS. The TSB staff policy for plants converting to the STS is to not consider proposed generic changes for implementation in the ITS until a staff approved TSTF is issued. However, the TSB staff will pursue licensee proposed generic changes which maintain safety, reduce unnecessary burden, increase efficiency or which increase effectiveness. When licensee proposed generic TS changes are documented to show a need, as described previously, to immediately revise the STS, then changes of these types will be considered for plant-specific approval on a parallel path with a proposed traveler. Revise the ITS to adopt the STS.

NMPC Response:

In the ITS submittal, NMP2 stated that this change was a deviation from both our CTS and the ISTS (Attachment 3 to the NMP2 letter from J. T. Conway to the NRC, dated October 16, 1998). As such, NMP2 was notified by the Project Manager that this change would not be reviewed by the TS Branch, but would be reviewed as directed by the Project Manager. Therefore, NMP2 will await the completion of this review before making any changes, if necessary, to the submittal. It should also be noted that this change does reduce an unnecessary administrative burden on NMP2. In addition, this change has been previously approved by the NRC on a plant specific basis for the most recent BWR/5 ITS submittal. A TSTF change has also been provided to the BWROG for consideration.

RAI 3.3.8.2-3:
ITS LCO 3.3.8.2
CTS 3.8.4.4
DOC L.1, JFD 3

Comment: 1) Revise L.1 to state that the proposed ITS Applicability addresses the operability modes or applicable conditions for all TS required equipment that is protected on the RPS buses.

NMPC Response:

DOC L.1 currently states that the Applicability of CTS 3.8.4.4 has been changed to only include those MODES or Conditions when the RPS, RHR SDC isolation, secondary containment isolation, or Control Room Emergency Filtration (CREF) System initiation functions are required. These components are all the TS required equipment powered from the



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RPS logic buses. A parenthetical statement to this effect will be added after the word "functions."

RAI 3.3.8.2-4:
ITS LCO 3.3.8.2
CTS
DOC M.3

***Comment:** DOC M.3 proposes allowable values in ITS for time delay settings of the RPS EPA - logic instrumentation. This proposed allowance cannot be incorporated into ITS until the staff approves the change. No immediate response to this RAI is required.*

NMPC Response:

No response appears to be necessary at this time.

RAI 3.3.8.3-1:
LCO 3.3.8.3, L.3, JFD 5

***Comment:** The proposed ITS SR Note provides a 6 hour allowed outage time for surveillance testing. DOC L.3 and JFD 5 both provide discussion and justification for this allowance based on other nuclear station TS amendments and other topical reports. This 6-hour allowance does not maintain the current licensing basis but requests implementation of a less restrictive generic deviation from the STS. The TSB staff policy for plants converting to the STS is to not consider proposed generic changes for implementation in the ITS until a staff approved TSTF is issued. However, the TSB staff will pursue licensee proposed generic changes which maintain safety, reduce unnecessary burden, increase efficiency or which increase effectiveness. When licensee proposed generic TS changes are documented to show a need, as described previously, to immediately revise the STS, then changes of these types will be considered for plant-specific approval on a parallel path with a proposed traveler. Revise the ITS to adopt STS.*

NMPC Response:

In the ITS submittal, NMP2 stated that this change was a deviation from both our CTS and the ISTS (Attachment 3 to the NMP2 letter from J. T. Conway to the NRC, dated October 16, 1998). As such, NMP2 was notified by the Project Manager that this change would not be reviewed by the TS Branch, but would be reviewed as directed by the Project Manager. Therefore, NMP2 will await the completion of this review before making any changes, if necessary, to the submittal. It should also be noted that this change does reduce an unnecessary administrative burden on NMP2. In addition, this change has been previously approved by the NRC on a plant specific basis for the most recent BWR/5 ITS submittal. A TSTF change has also been provided to the BWROG for consideration.



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RAI 3.3.8.3-2:
ITS LCO 3.3.8.3
CTS
DOC M.2

Comment: DOC M.3 proposes an allowable value in ITS for time delay settings of the RPS EPA - solenoid instrumentation. This proposed allowance cannot be incorporated into ITS until the staff approves the change.

NMPC Response:

No response appears to be necessary at this time.

