

ATTACHMENT 1: CHANGES TO SPECIFICATION 3/4.3.7.5

1. MARKED UP UNITS 1 AND 2 CURRENT TECHNICAL SPECIFICATION PAGES
2. RELEVANT PAGES FROM 8/1/96 IMPROVED TECHNICAL SPECIFICATION SUBMITTAL:
 - CTS MARKUP "ROADMAP"
 - DISCUSSION OF CHANGES
 - NO SIGNIFICANT HAZARDS EVALUATION

9710240218 971017
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**TABLE 3.3.7.5-1
ACCIDENT MONITORING INSTRUMENTATION**

INSTRUMENT	REQUIRED NUMBER OF CHANNELS	MINIMUM CHANNELS OPERABLE	ACTION	APPLICABLE OPERATIONAL CONDITION
1. Reactor Vessel Steam Dome Pressure	2	1	80	1,2
2. Reactor Vessel Water Level	2	1	80	1,2
3. Suppression Chamber Water Level	2	1	80	1,2
4. Suppression Chamber Water Temperature	8,6 locations	6,1/location	80	1,2
5. Suppression Chamber Air Temperature	2	1	80	1,2
6. Primary Containment Pressure	2/range	1/range	80	1,2
7. Drywell Temperature	2	1	80	1,2
8. Drywell Gaseous Analyzer				
a. Oxygen	2	1	80	1*, 2*
b. Hydrogen	2	1	82	1*, 2*
9. Safety/Relief Valve Position Indicators	1/valve*	1/valve*	80	1,2
10. Containment High Radiation	2	1	81	1,2
11. Noble gas monitors**				
a. Reactor Bldg. Vent	1	1	81	1, 2 and ***
b. SGTS Vent	1	1	81	1, 2 and ***
c. Turbine Bldg. Vent	1	1	81	1, 2
12. Neutron Flux	2	1	80	1, 2
<p>* Acoustic monitor. Compliance with these requirements for the "S" SRV acoustic monitor is not required for the period beginning September 12, 1997, until the next unit shutdown of sufficient duration to allow for containment entry, not to exceed the 10th refueling and inspection outage.</p> <p>** Mid-range and high-range channels</p> <p>*** When moving irradiated fuel in the secondary containment.</p> <p># See Special Test Exception 3.10.1</p>				

Deleted

TABLE 4.3.7.5-1

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>INSTRUMENT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>
1. Reactor Vessel Steam Dome Pressure	M	R
2. Reactor Vessel Water Level	M	R
3. Suppression Chamber Water Level	M	R
4. Suppression Chamber Water Temperature	M	R
5. Suppression Chamber Air Temperature	M	R
6. Primary Containment Pressure	M	R
7. Drywell Temperature	M	R
8. Drywell Oxygen/Hydrogen Analyzer	M	Q*
9. Safety/Relief Valve Position Indicators	M	R
10. Containment High Radiation	M	R**
11. Noble gas monitors		
a. Reactor Bldg. Vent	M	R
b. SGIS Vent	M	R
c. Turbine Bldg. Vent	M	R
12. Neutron Flux	M	R

*For hydrogen analyzer, use sample gas containing:

- Nominal zero volume percent hydrogen, balance nitrogen.
- Nominal thirty volume percent hydrogen, balance nitrogen.

**CHANNEL CALIBRATION shall consist of an electronic calibration of the channel, not including the detector, for range decades above 10 R/hr and a one point calibration check of the detector below 10 R/hr with an installed or portable gamma source.

Deleted

3.3.7.5-1

ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	REQUIRED NUMBER OF CHANNELS	MINIMUM CHANNELS OPERABLE	ACTION	APPLICABLE OPERATIONAL CONDITIONS
1. Reactor Vessel Steam Dome Pressure	2	1	80	1,2
2. Reactor Vessel Water Level	2	1	80	1,2
3. Suppression Chamber Water Level	2	1	80	1,2
4. Suppression Chamber Water Temperature	8,6 locations	6,1/location	80	1,2
5. Suppression Chamber Air Temperature	2	1	80	1,2
6. Primary Containment Pressure	2/range	1/range	80	1,2
7. Drywell Temperature	2	1	80	1,2
8. Drywell Gaseous Analyzer a. Oxygen b. Hydrogen	2 2	1 1	80 82	1, 2 [#] 1, 2 [#]
9. Safety/Relief Valve Position Indicators Deleted	1/valve^{**}	1/valve^{**}	80	1,2
10. Containment High Radiation	2	1	81	1,2
11. Noble gas monitors a. Reactor Bldg. Vent b. SGTS Vent c. Turbine Bldg. Vent	1 1 1	1 1 1	81 81 81	1,2 and *** 1,2 and *** 1,2
12. Primary Containment Isolation Valve Position	1/valve	1/valve	80	1,2
13. Neutron Flux	2	1	80	1,2

~~Acoustic monitor.~~

•• Mid-range and high-range channels.

••• When moving irradiated fuel in the secondary containment.

! See Special Test Exception 3.10.1.

~~** Compliance with these requirements for the "S" SRV acoustic monitor is not required for the period beginning January 21, 1994, until the next unit shutdown of sufficient duration to allow for containment entry, not to exceed the sixth refueling and inspection outage.~~



TABLE 4.3.7.5-1

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION
1. Reactor Vessel Steam Dome Pressure	M	R
2. Reactor Vessel Water Level	M	R
3. Suppression Chamber Water Level	M	R
4. Suppression Chamber Water Temperature	M	R
5. Suppression Chamber Air Temperature	M	R
6. Primary Containment Pressure	M	R
7. Drywell Temperature	M	R
8. Drywell Oxygen/Hydrogen Analyzer	M	Q*
9. Safety/Relief Valve Position Indicators	M	R
10. Containment High Radiation	M	R**
11. Noble Gas Monitors a. Reactor Bldg. Vent b. SGTS Vent c. Turbine Bldg. Vent	M M M	R R R
12. Primary Containment Isolation Valve Position	M	NA
13. Neutron Flux	M	R

Deleted

- * For hydrogen analyzer, use sample gas containing:
 - a. Nominal zero volume percent hydrogen, balance nitrogen.
 - b. Nominal thirty volume percent hydrogen, balance nitrogen.

** CHANNEL CALIBRATION shall consist of an electronic calibration of the channel, not including the detector, for range decades above 10 R/hr and a one point calibration check of the detector below 10 R/hr with an installed or portable gamma source.

~~Compliance with these requirements for the "S" SRV acoustic monitor is not required for the period beginning January 21, 1994, until the next unit shutdown of sufficient duration to allow for containment entry, not to exceed the sixth refueling and inspection outage.~~

SUSQUEHANNA - UNIT 1

3/4 3-71

Amendment No. 40

3.3.3.1-1
TABLE 3.3.7.5-1

ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	REQUIRED NUMBER OF CHANNELS	MINIMUM CHANNELS OPERABLE	ACTION	APPLICABLE OPERATIONAL CONDITION
1. Reactor Vessel Steam Damp Pressure	2	1	00 E	1, 2
2. Reactor Vessel Water Level	2	1	00	1, 2
3. Suppression Chamber Water Level	2	1	00	1, 2
4. Suppression Chamber Water Temperature	8, 6 locations	6, 1/location	00	1, 2
5. Suppression Chamber Air Temperature	2	1	00	1, 2
6. Primary Containment Pressure	2/range	1/range	00	1, 2
7. Drywell Temperature	2	1	00	1, 2
8. Drywell Gaseous Analyzer	2	1	00	1, 2
a. Oxygen	2	1	00	1, 2
b. Hydrogen	2	1	02	1, 2
9. Safety/Relief Valve Position Indicators	1/valve*	1/valve*	00	1, 2
10. Containment High Radiation	2	1	01 F	1, 2
11. Noble gas monitors**				
a. Reactor Bldg. Vent	1	1	01	1, 2 and ***
b. SGTS Vent	1	1	01	1, 2 and ***
c. Turbine Bldg. Vent	1	1	01	1, 2
12. Neutron Flux	2	1	00 E	1, 2

a. Wide Range
b. Extended Range
c. Fuel Zone Range

Add Table 3.3.3.1-1
Function 6

MINIMUM CHANNELS OPERABLE

8, 6 locations

a. Accident
b. LOCA

Containment

Primary

*Acoustic monitor.
**Mid-range and high-range channels
***When moving irradiated fuel in the secondary containment.
(See Special Test Exception 3.10.1)

Specification 3.3.3.1
(See Doc 3.3.2.1 values indicate.)
Relocated (See Doc CTS 3/4.3)

A.1

3.3.3.1-1
TABLE 4.3.7.5-1

SUSQUEHANNA - UNIT 1

3/4 3-73

Amendment No. 40

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION
1. Reactor Vessel Steam Dome Pressure	H	
2. Reactor Vessel Water Level	H	
3. Suppression Chamber Water Level	H	
10 A. Suppression Chamber Water Temperature	H	R (LOI)
B. Suppression Chamber Air Temperature	H	R
4 B. Primary Containment Pressure	H	R
9 7. Drywell Temperature	H	R
8. Drywell Oxygen/Hydrogen Analyzer	H	R
9. Safety/Relief Valve Position Indicators	H	R (R.10) CTS 314.3
5.10. Containment High Radiation	H	R (LOI)
11. Noble gas monitors		
a. Reactor Bldg. Vent	H	R (R.10)
b. SGIS Vent	H	R
c. Turbine Bldg. Vent	H	R
7 H. Neutron Flux	H	R (LOI)

^aFor hydrogen analyzer, use sample gas containing:
a. Nominal zero volume percent hydrogen, balance nitrogen.
b. Nominal thirty volume percent hydrogen, balance nitrogen.
^ACHANNEL CALIBRATION shall consist of an electronic calibration of the channel, not including the detector, for range decades above 10 R/hr and a one point calibration check of the detector below 10 R/hr with an installed or portable gamma source.

(1A2)

(A.17)

Specification 3.3.3.1
(See Doc 321 with initials)
Relocated (See Doc CTS 314.3)

SUSQUEHANNA - UNIT 2

3.3.3.1-1
TAL - 1.3.7.6-1
ACCIDENT MONITORING INSTRUMENTATION

INSTRUMENT	REQUIRED NUMBER OF CHANNELS	MINIMUM CHANNELS OPERABLE	ACTION	APPLICABLE OPERATIONAL CONDITIONS
1. Reactor Vessel Steam Dome Pressure	2	1	80 E	1,2
2. Reactor Vessel Water Level	2	1	80	1,2
3. Suppression Chamber Water Level	2	1	80	1,2
4. Suppression Chamber Water Temperature	8, 8 locations	6, 1/location	80	1,2
5. Suppression Chamber Air Temperature	2	1	80	1,2
6. Primary Containment Pressure	2 range	1 range	80	1,2
7. Drywell Temperature	2	1	80	1,2
8. Drywell Gaseous Analyzer a. Oxygen b. Hydrogen	2 2	1 1	80 82	1,2
9. Safety/Relief Valve Position Indicators	1/valve	1/valve	80	1,2
10. Containment High Radiation (Primary)	2	1	81 F	1,2
11. Noble gas monitors a. Reactor Bldg. Vent b. SGTS Vent c. Turbine Bldg. Vent	1 1 1	1 1 1	81 81 81	1,2 and ... 1,2 and ... 1,2
12. Primary Containment Isolation Valve Position	1/valve	1/valve	80 E	1,2
13. Neutron Flux	2	1	80 E	1,2

(M.4)
a. Accidents
b. LCA

(A.6)
Containment

a. Wide Range
b. Extended Range
c. Fuel Zone Range

(M.4)

Add table 3.3.3.1-1 function 6

(A.3) (M.1)

Appendix No. 98.108
118, 128

- Acoustic monitor.
- Mid-range and high-range channels.
- When moving irradiated fuel in the secondary containment.
- See Special Test Exception 3.10.1.
- Compliance with these requirements for the SRV acoustic monitor is not required for the period beginning January 27, 1994, until the next unit shutdown of sufficient duration to allow for containment entry, not to exceed the sixth refueling and inspection outage.

Specifications 3.3.3.1
(See doc 3.3.3.1 and 3.3.3.1)
Relocated (See doc 3.3.3.1)

(A.7)

Specification 3.3.3.1
(See Doc 3.3.3.1 unless indicated)

3.3.3.1-1 Relocated
TABLE 4.3.7.5-1 (See Doc CTJ 3/4.3)

ACCIDENT MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

(M.7)
a. Wide range
b. extended
c. fuel zone

(M.4)
a. accidents
b. LCA

(M.1)
Add table
3.3.3.1-1
function 6

INSTRUMENT	CHANNEL CHECK	CHANNEL CALIBRATION
1. Reactor Vessel Steam Dome Pressure	M	R
2. Reactor Vessel Water Level	M	R
3. Suppression Chamber Water Level	M	R
4. Suppression Chamber Water Temperature	M	R
5. Suppression Chamber Air Temperature	M	R (R.D) CTJ 3/4.3
6. Primary Containment Pressure	M	R
7. Drywell Temperature	M	R
8. Drywell Oxygen/Hydrogen Analyzer <i>Continued</i>	M	a°
9. Safety/Relief Valve Position Indicators	M	R (R.D) CTJ 3/4.3
10. Containment High Radiation	M	R**
11. Noble Gas Monitors a. Reactor Bldg. Vent b. SGTS Vent c. Turbine Bldg. Vent	M M M	R R R
12. Primary Containment Isolator Valve Position	M	NA
13. Neutron Flux	M	R

(LA.2)

- For hydrogen analyzer, use sample gas containing:
 - a. Nominal zero volume percent hydrogen, balance nitrogen.
 - b. Nominal thirty volume percent hydrogen, balance nitrogen.
- CHANNEL CALIBRATION shall consist of an electronic calibration of the channel, not including the detector, for range decades above 10 R/hr and a one point calibration check of the detector below 10 R/hr with an installed or portable gamma source.
- Compliance with these requirements for the "S" SAV acoustic monitor is not required for the period beginning January 21, 1984, until the next unit shutdown of sufficient duration to allow for containment entry, not to exceed the sixth refueling and inspection outage.

(A.7)

3/4.3.7.5 ACCIDENT MONITORING INSTRUMENTATION

LCO Statement:

The accident monitoring instrumentation channels shown in Table 3.3.7.5-1 shall be OPERABLE.

Discussion:

Each individual accident monitoring parameter has a specific purpose, however, the general purpose for all accident monitoring instrumentation is to provide sufficient information to confirm an accident is proceeding per prediction, i.e. automatic safety systems are performing properly, and deviations from expected accident course are minimal.

Comparison to Deterministic Screening Criteria:

The NRC position on application of the deterministic screening criteria to post-accident monitoring instrumentation is documented in letter dated May 7, 1988 from T.E. Murley (NRC) to R.F. Janecek (BWROG). The position was that the post-accident monitoring instrumentation table list should contain, on a plant specific basis, all Regulatory Guide 1.97 Type A instruments specified in the plant's Safety Evaluation Report (SER) on Regulatory Guide 1.97, and all Regulatory Guide 1.97 Category 1 instruments. Accordingly, this position has been applied to the Susquehanna Units 1 and 2 Regulatory Guide 1.97 instruments. Those instruments meeting these criteria have remained in Technical Specifications. The instruments not meeting these criteria have been relocated from the Technical Specifications to plant controlled documents.

The following summarizes the Susquehanna Units 1 and 2 position for those instruments currently in Technical Specifications.

From Nuclear Regulatory Letter A. Schwencer to N. Curtis,
Emergency Response Capability, conformance to R.G. 1.97 Rev.2,
dated February 6, 1985.

Type A Variables

Reactor Steam Dome Pressure
Reactor Vessel Water Level
Containment H₂ & O₂ Concentration
Suppression Chamber Water Level
Suppression Chamber Water Temperature
Primary Containment Pressure

Other Type, Category 1 Variables

Primary Containment Area Radiation
PCIV Position
Neutron Flux
Drywell Atmosphere Temperature

3/4.3.7.5 ACCIDENT MONITORING INSTRUMENTATION - continued

For other post-accident monitoring instrumentation currently in Technical Specifications, their loss is not risk-significant because the variable they monitored did not qualify as a Type A or Category 1 variable (one that is important to safety and needed by the operator, so that the operator can perform necessary normal actions).

Conclusion

Since the screening criteria have not satisfied for non-Regulatory Guide 1.97 Type A or Category 1 variable instruments, their associated LCO and Surveillances may be relocated to other plant controlled documents outside the Technical Specifications. The instruments to be relocated are as follows:

- Safety/Relief Valve Position
- Suppression Chamber Air Temperature
- Noble Gas Monitors

DISCUSSION OF CHANGES
ITS: SECTION 3.3.3.1 - POST ACCIDENT MONITORING INSTRUMENTATION

ADMINISTRATIVE (continued)

- A.7 (Unit 2 Only) SSES CTS Tables 3.3.7.5-1 and 4.3.7.5-1 footnotes specify that compliance with the "S" SRV acoustic monitor is not required until the next refueling outage following January 21, 1994. SSES ITS 3.3.3.1 has eliminated this allowance since the time period for this one time exemption has expired. This is an administrative change with no impact on safety because the allowance is no longer applicable.

TECHNICAL CHANGES - MORE RESTRICTIVE

- M.1 (Unit 1 only) SSES ITS 3.3.3.1 adds Item 6, Containment Isolation Valve Position to Unit 1. This Function is included in accordance with BWR STS NUREG 1433, Rev. 1 guidelines to include all Type A and Category 1 PAMs. In addition, Table 3.3.3.1-1 footnotes (a) and (b) are added to further define the requirements for this function. Therefore, this more restrictive change will have no negative impact on safety because it ensures that proper Actions are taken for this required PAM Function.
- M.2 SSES CTS Table 3.3.7.5-1, Action 81, requires actions to be taken only if 2 Containment High Radiation instruments are inoperable. SSES ITS 3.3.3.1, Action A and Action B, are applied to the Primary Containment High Radiation instruments and require restoration of the channel within 30 days or submit a special report, consistent with Actions for other PAM instruments. This is an additional restriction on plant operation, with no negative impact on safety because it requires restoration of required instrumentation.
- M.3 SSES CTS Table 3.3.7.5-1 Function 4, Suppression Chamber Water Temperature, requires 8 channels (temperature sensors), 6 locations. This implies for SSES design that only one channel of temperature monitoring is required. SSES ITS Table 3.3.3.1 Function 10 specifies that there will be two channels of Suppression Chamber Water Temperature and the SSES ITS Bases further specifies that each of these channels should have a minimum of one sensor in each quadrant. This change is being made to clearly define the required channels for Suppression Chamber Water Temperature and is required to ensure at least two channels are available to ensure that no single failure will disable the function. Requiring only one sensor in each quadrant is acceptable because the post accident monitoring function is only required to provide operators with a indication of bulk temperature following an accident. Post accident follows a significant blowdown into the suppression pool after which the suppression pool volume will be effectively mixed. Finally, as defined in the Bases of SSES ITS SR 3.6.2.1 "Suppression Pool Water Temperature", during normal operations, Suppression Pool temperature is required to be monitored using at least six sensors. This requirement ensures proper monitoring of the

DISCUSSION OF CHANGES
RELOCATED CTS 3/4.3 - INSTRUMENTATIONRELOCATED SPECIFICATIONS (continued)

Criteria to the SSES CTS. This requirement has been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.

- R.6 SSES CTS 3.3.6, Control Rod Block Instrumentation, includes control rod block functions initiated by the APRMs, SRMs, IRMs, Scram Discharge Volume, and the Reactor Coolant System Recirculation Flow which do not satisfy the NRC Policy Statement Technical Specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. These requirements have been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.
- R.7 The requirements specified in SSES CTS 3/4.3.7 Table 3.3.7.1-1, and 4.3.7.1-1 Items 2.a.1, and 2.a.2 Area Criticality Monitors do not satisfy the NRC Policy Statement technical specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. This requirement has been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.
- R.8 The requirements specified in SSES CTS 3/4.3.7.2, Seismic Monitoring Instrumentation, do not satisfy the NRC Policy Statement Technical Specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. These requirements have been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.
- R.9 The requirements specified in SSES CTS 3/4.3.7.3, Meteorological Monitoring Instrumentation, do not satisfy the NRC Policy Statement Technical Specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. These requirements have been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.
- R.10 The requirements specified in SSES CTS 3/4.3.7.5 Table 3.3.7.5-1 and Table 4.3.7.5-1: Item 9 for the Safety/Relief Valve Position Indicators, Item 11 for Noble Gas Monitors and Item 5, Suppression Chamber Air Temperature do not satisfy the NRC Policy Statement technical specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. This requirement has been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.
- R.11 The requirements specified in SSES CTS 3/4.3.7.7, Traversing In-Core Probe System, do not satisfy the NRC Policy Statement Technical Specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. These requirements have been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.

NO SIGNIFICANT HAZARDS EVALUATION
ITS: SECTION 3.3 - INSTRUMENTATIONADMINISTRATIVE CHANGES
("A" Labeled Comments/Discussions) (continued)

- A.7 (Unit 2 Only) SSES CTS Tables 3.3.7.5-1 and 4.3.7.5-1 footnotes specify that compliance with the "S" SRV acoustic monitor is not required until the next refueling outage following January 21, 1994. SSES ITS 3.3.3.1 has eliminated this allowance since the time period for this one time exemption has expired. This is an administrative change with no impact on safety because the allowance is no longer applicable.

Section 3.3.3.2

- A.2 SSES ITS 3.3.3.2 Actions are preceded by Note 2 which stipulates that "Separate Condition entry is allowed for each Function." This note provides more explicit instructions for proper application of the Actions for SSES ITS compliance. In conjunction with the SSES ITS Specification 1.3, "Completion Times," this Note provides direction consistent with the intent of the existing Action for an inoperable channel. This is an administrative change with no impact on safety.

Section 3.3.4.1

- A.2 SSES ITS SR 3.3.4.1.4 establishes a specific requirement to Verify TSV-Closure and TCV Fast Closure, Trip Oil Pressure-Low Functions are not bypassed when THERMAL POWER is $\geq 30\%$ RTP every 24 months. This verification is currently performed as part of plant startup from a refuel outage which is performed at the same Frequency; therefore, the establishment of a specific SR is an administrative change with no impact on safety.
- A.3 The SSES CTS 3.3.4.2 Applicability is Operational Condition 1, when Thermal Power is greater than or equal to 30% of Rated Thermal Power. SSES ITS 3.3.4.1 Applicability is Thermal Power greater than 30%. Since the plant must be in MODE 1 at the power level, this is an administrative change with no impact on safety.
- A.4 SSES ITS 3.3.4.1 Actions are preceded by the Note "Separate Condition entry is allowed for each channel." This note provides more explicit instructions for proper application of the Actions for SSES ITS compliance. In conjunction with the SSES ITS Specification 1.3, "Completion Times," this Note provides direction consistent with the intent of the existing Action for an inoperable channel. This is an administrative change with no impact on safety.
- A.5 SSES CTS 4.3.4.2.3, EOC-RPT Instrumentation, response time testing modifies the required Frequency for this SR with the allowance that: Each test shall include at least the logic of one type of channel input, turbine control valve fast closure or turbine stop valve closure, such that both types of channel inputs are tested at least once per 36 months. SSES ITS SR 3.3.4.1.5 modifies the Frequency of this SR by allowing it to be performed on a Staggered Test Bases. The SSES CTS 4.3.4.2.3 Frequency is consistent with the SSES ITS Definition of Staggered Test Bases; therefore, this is an administrative change with no impact on safety.

NO SIGNIFICANT HAZARDS EVALUATION
ITS: SECTION 3.3 - INSTRUMENTATION

ADMINISTRATIVE CHANGES
("A" Labeled Comments/Discussions) (continued)

Section 3.3.8.2

- A.2 SSES CTS 3.8.4.3, Action a and Action b, provides an option to restore the inoperable power monitoring assembly to Operable status. SSES ITS 3.3.8.2 requires that the associated RPS MG set or alternate power supply be removed from service but does not provide the option to restore Operability. This is acceptable because the Actions (based on the BWR STS, NUREG-1433, Revision 1) do not explicitly detail options of "restore...to OPERABLE status." This action is always an option, and is implied in all Actions. Omitting this action is an administrative change with no impact on safety because this is a presentation preference and results in no technical change.
- A.3 (Unit 1 only) SSES CTS 4.8.4.3 footnote "**" identifies that the setpoints are initial setpoints and final setpoints are to be determined during startup testing. SSES ITS 3.3.8.2 does not contain this footnote because this is a one time allowance and it is not necessary to include this in the SSES ITS. Therefore, this is an administrative change with no impact on safety.

The bases for the determination that the proposed changes do not involve a significant hazards consideration is an evaluation of these changes against each of the criteria in 10 CFR 50.92. The criteria and the conclusions of the evaluation are presented below.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed changes consist of reformatting, renumbering, and rewording the existing Technical Specifications to establish consistency with Boiling Water Reactor (BWR) Standard Technical Specifications (STS), NUREG-1433, Rev 1. This reformatting, renumbering, and rewording involves no technical changes to the Susquehanna Steam and Electric Station (SSES) current Technical Specifications (CTS). The changes are administrative because they do not have any affect on the initiators of analyzed events and do not affect any assumptions associated with the mitigation of accident or transient events. Therefore, these changes do not involve any increase in the probability or consequences of any accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes will not involve any physical changes to plant systems, structures, or components (SSC), or the manner in which these SSC are operated, maintained, modified, tested, or inspected. The proposed changes will not impose or eliminate any requirements. Therefore, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

NO SIGNIFICANT HAZARDS EVALUATION
ITS: SECTION 3.3 - INSTRUMENTATION

ADMINISTRATIVE CHANGES
("A" Labeled Comments/Discussions) (continued)

3. Does this change involve a significant reduction in a margin of safety?

The proposed changes will not reduce a margin of safety because the changes identified as Administrative were deliberately limited to those changes that have no impact on any safety analyses assumptions. Therefore, no question of safety is involved and these changes do not involve any reduction in a margin of safety.

NO SIGNIFICANT HAZARDS EVALUATION
RELOCATED CTSRELOCATED SPECIFICATIONS
("R" Labeled Comments/Discussions) (continued)

- R.5 The requirement specified in SSES CTS 3.3.3 Table 3.3.3-1, Table 3.3.3-2, and 4.3.3.1-1 Item 4.h, ADS Manual Inhibit Function, does not satisfy the NRC Policy Statement Technical specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. This requirement has been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.
- R.6 SSES CTS 3.3.6, Control Rod Block Instrumentation, includes control rod block functions initiated by the APRMs, SRMs, IRMs, Scram Discharge Volume, and the Reactor Coolant System Recirculation Flow which do not satisfy the NRC Policy Statement Technical Specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. These requirements have been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.
- R.7 The requirements specified in SSES CTS 3/4.3.7 Table 3.3.7.1-1, and 4.3.7.1-1 Items 2.a.1, and 2.a.2 Area Criticality Monitors do not satisfy the NRC Policy Statement technical specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. This requirement has been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.
- R.8 The requirements specified in SSES CTS 3/4.3.7.2, Seismic Monitoring Instrumentation, do not satisfy the NRC Policy Statement Technical Specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. These requirements have been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.
- R.9 The requirements specified in SSES CTS 3/4.3.7.3, Meteorological Monitoring Instrumentation, do not satisfy the NRC Policy Statement Technical Specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. These requirements have been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.
- R.10 The requirements specified in SSES CTS 3/4.3.7.5 Table 3.3.7.5-1 and Table 4.3.7.5-1: Item 9 for the Safety/Relief Valve Position Indicators, Item 11 for Noble Gas Monitors and Item 5, Suppression Chamber Air Temperature do not satisfy the NRC Policy Statement technical specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. This requirement has been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.
- R.11 The requirements specified in SSES CTS 3/4.3.7.7, Traversing In-Core Probe System, do not satisfy the NRC Policy Statement Technical Specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. These requirements have been

NO SIGNIFICANT HAZARDS EVALUATION
RELOCATED CTS

RELOCATED SPECIFICATIONS
("R" Labeled Comments/Discussions) (continued)

- R.1 The requirements specified in SSES CTS 3/4.12.1, Monitoring Program, do not satisfy the NRC Policy Statement Technical Specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. These requirements have been relocated to the Technical Requirements Manual (TRM). See the SSES CTS Split Report for further discussion of this change.
- R.2 The requirements specified in SSES CTS 3/4.12.2, Land Use Census, do not satisfy the NRC Policy Statement Technical Specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. These requirements have been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.
- R.3 The requirements specified in SSES CTS 3/4.12.3, Interlaboratory Comparison Program, do not satisfy the NRC Policy Statement Technical Specification screening criteria as documented in the Application of Selection Criteria to the SSES CTS. These requirements have been relocated to the TRM. See the SSES CTS Split Report for further discussion of this change.

The bases for the determination that the proposed changes do not involve a significant hazards consideration is an evaluation of these changes against each of the criteria in 10 CFR 50.92. The criteria and the conclusions of the evaluation are presented below.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed changes relocate requirements or surveillances for structures, systems, components or variables that do not meet any of the four criteria in the NRC Policy Statement used for defining the scope of Technical Specifications. These relocated requirements are not deleted or changed. Therefore, these changes will not result in any changes to the requirements specified in the SSES CTS, but will reduce the level of regulatory control on the identified requirements. The level of regulatory control has no impact on the probability or the consequences of an accident previously evaluated, therefore, these changes have no impact on the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes will not involve any physical changes to plant systems, structures, or components (SSC), or the manner in which these SSC are operated, maintained, modified, tested, or inspected. The changes in normal plant operation are consistent with the current safety analysis assumptions. The proposed changes will not impose or eliminate any requirements. Therefore, these changes do not create the

NO SIGNIFICANT HAZARDS EVALUATION
RELOCATED CTS

RELOCATED SPECIFICATIONS
("R" Labeled Comments/Discussions) (continued)

possibility of a new or different kind of accident from any accident previously evaluated.

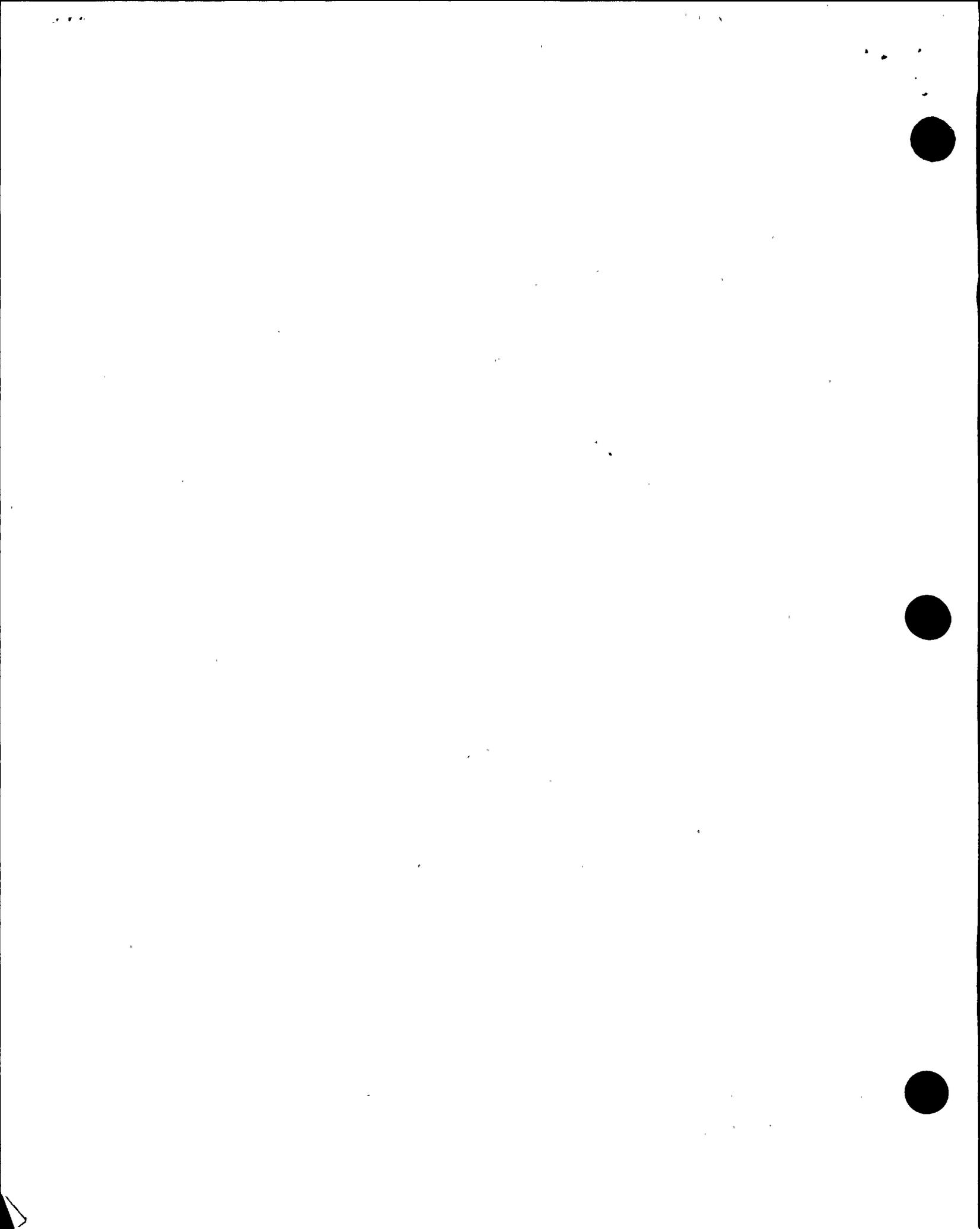
3. Does this change involve a significant reduction in a margin of safety?

The margin of safety as defined in the bases of any Technical Specification is not reduced. This conclusion is supported by the conclusion that the relocated requirements are those existing SSES Technical Specifications that failed to meet any of the four criteria in the NRC Policy Statement used for defining the scope of Technical Specifications. In addition, the relocated requirements and surveillances for the affected structures, systems, components or variables remain the same as stated in the existing Technical Specifications. Therefore, no reduction in a margin of safety will be permitted.

Removal of these items from Technical Specifications eliminates the requirement for NRC review and approval of revisions in accordance with 10 CFR 50.92. Elimination of this administrative process does not have a margin of safety that can be evaluated. However, the proposed changes are consistent with the BWR Standard Technical Specification, NUREG-1433, Rev 1, which was approved by the NRC. Revising the Technical Specifications to reflect the approved level of detail ensures no significant reduction in the margin of safety.

ATTACHMENT 2: CHANGES TO SPECIFICATION 3/4.4.2

1. MARKED UP UNITS 1 AND 2 CURRENT TECHNICAL SPECIFICATION PAGES
2. RELEVANT PAGES FROM 8/1/96 IMPROVED TECHNICAL SPECIFICATION SUBMITTAL:
 - CTS MARKUP "ROADMAP"
 - DISCUSSION OF CHANGES
 - NO SIGNIFICANT HAZARDS EVALUATION



REACTOR COOLANT SYSTEM

3/4.4.2 SAFETY/RELIEF VALVES

LIMITING CONDITION FOR OPERATION

3.4.2 The safety valve function of at least 12 of the following reactor coolant system safety/relief valves shall be OPERABLE with the specified code safety valve function lift settings: * **

- 2 safety-relief valves @ 1175 psig ± 1%
- 6 safety-relief valves @ 1195 psig ± 1%
- 8 safety-relief valves @ 1205 psig ± 1%

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

ACTION:

- a. With the safety valve function of one or more of the above required safety/relief valves inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.
- b. With one or more safety/relief valves stuck open, provided that suppression pool average water temperature is less than 105°F, close the stuck open relief valve(s); if unable to close the open valve(s) within 2 minutes or if suppression pool water temperature is 105°F or greater, place the reactor mode switch in the Shutdown position.
- ~~c. *With one or more safety/relief valve acoustic monitors inoperable, restore the inoperable monitor(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.~~

SURVEILLANCE REQUIREMENTS

4.4.2 ~~*The acoustic monitor for each safety/relief valve shall be demonstrated OPERABLE with the setpoint verified to be 0.25 of the full open noise level by performance of a:~~

- ~~a. CHANNEL FUNCTIONAL TEST at least once per 31 days, and a~~
- ~~b. Calibration in accordance with procedures prepared in conjunction with its manufacturer's recommendations at least once per 18 months.##~~

Verify the safety function lift setpoints of the required S/RVs in accordance with the Inservice Testing Program.

* The lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures.

** Up to 2 inoperable valves may be replaced with spare OPERABLE valves with lower setpoints until the next refueling.

~~# Compliance with these requirements for the "S" SRV acoustic monitor is not required for the period beginning September 12, 1997, until the next unit shutdown of sufficient duration to allow for containment entry, not to exceed the 10th refueling and inspection outage.~~

~~## The provision of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the test.~~

REACTOR COOLANT SYSTEM

3/4.4.2 SAFETY/RELIEF VALVES

LIMITING CONDITION FOR OPERATION

3.4.2 The safety valve function of at least 12 of the following reactor coolant system safety/relief valves shall be OPERABLE with the specified code safety valve function lift settings:

- 2 safety-relief valves @ 1175 psig ± 1%
- 6 safety-relief valves @ 1195 psig ± 1%
- 8 safety-relief valves @ 1205 psig ± 1%

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, AND 3.

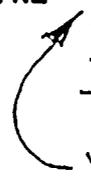
ACTION:

- a. With the safety valve function of one or more of the above required safety/relief valves inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.
- b. With one or more safety/relief valves stuck open, provided that suppression pool average water temperature is less than 105°F, close the stuck open relief valve(s); if unable to close the open valve(s) within 2 minutes or if suppression pool water temperature is 105°F or greater, place the reactor mode switch in the Shutdown position.
- ~~c. With one or more safety/relief valve acoustic monitors inoperable, restore the inoperable monitor(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.~~

SURVEILLANCE REQUIREMENTS

4.4.2~~###~~ The acoustic monitor for each safety/relief valve shall be demonstrated OPERABLE with the setpoint verified to be 0.25 of the full open noise level by performance of a:

- ~~a. CHANNEL FUNCTIONAL TEST at least once per 31 days, and a~~
- ~~b. Calibration in accordance with procedures prepared in conjunction with its manufacturer's recommendations at least once per 18 months.~~



Verify the safety function lift setpoints of the required S/RVs in accordance with the Inservice Testing Program.

- The lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures.
- Up to 2 inoperable valves may be replaced with spare OPERABLE valves with lower setpoints until the next refueling.
- # Initial setting shall be in accordance with the manufacturer's recommendation. Adjustment to the valve full open noise level shall be accomplished during the startup test program.
- ~~### The provisions of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the test.~~
- ~~### Compliance with these requirements for the "S" SRV acoustic monitor is not required for the period beginning January 21, 1994, until the next unit shutdown of sufficient duration to allow for containment entry, not to exceed the sixth refueling and inspection outage.~~

Specification 3.4.3

REACTOR COOLANT SYSTEM

3/4.4.2 SAFETY/RELIEF VALVES

(A.1)

LIMITING CONDITION FOR OPERATION

Lco 3.4.3 3.4.2. The safety valve function of at least 12 of the following reactor coolant system safety/relief valves shall be OPERABLE with the specified code safety valve function lift settings:

SR 3.4.3.1

SR 3.4.3.1 2 safety-relief valves @ 1175 psig ± 1%
6 safety-relief valves @ 1195 psig ± 1%
8 safety-relief valves @ 1205 psig ± 1%

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2 and 3.

ACTION:

Action A. With the safety valve function of one or more of the above required safety/relief valves inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.

b. With one or more safety/relief valves stuck open, provided that suppression pool average water temperature is less than 105°F, close the stuck open relief valve(s); if unable to close the open valve(s) within 2 minutes or if suppression pool water temperature is 105°F or greater, place the reactor mode switch in the Shutdown position. (L.1)

c. With one or more safety/relief valve acoustic monitors inoperable, restore the inoperable monitor(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours. (LA.2)

SURVEILLANCE REQUIREMENTS

4.4.2 The acoustic monitor for each safety/relief valve shall be demonstrated OPERABLE with the setpoint verified to be 0.25 of the full open noise level by performance of:

a. CHANNEL FUNCTIONAL TEST at least once per 31 days, and a
b. Calibration in accordance with procedures prepared in conjunction with its manufacturer's recommendations at least once per 18 months. (LA.2)

Added SR 3.4.3.1 (H.1)

SR 3.4.3.1 NOTE The lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures. (LA.1)
Up to 2 inoperable valves may be replaced with spare OPERABLE valves with lower setpoints until the next refueling.

The provision of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the test. (LA.2)

SPECIFICATION 343

REACTOR COOLANT SYSTEM

3/4.4.2 SAFETY/RELIEF VALVES

LIMITING CONDITION FOR OPERATION

A.1

LCO 3.43-3.4.2 The safety valve function of at least 12 of the following reactor coolant system safety/relief valves shall be OPERABLE with the specified code safety valve function lift settings: SR 3.4.3.1

- SR 3.4.3.1 2 safety-relief valves @ 1175 psig ± 1%
- 6 safety-relief valves @ 1195 psig ± 1%
- 8 safety-relief valves @ 1205 psig ± 1%

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, AND 3.

ACTION:

Action A

- a. With the safety valve function of one or more of the above required safety/relief valves inoperable, be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN within the next 24 hours.
- b. With one or more safety/relief valves stuck open, provided that suppression pool average water temperature is less than 105°F, close the stuck open relief valve(s); if unable to close the open valve(s) within 2 minutes or if suppression pool water temperature is 105°F or greater, place the reactor mode switch in the Shutdown position.
- c. With one or more safety/relief valve acoustic monitors inoperable, restore the inoperable monitor(s) to OPERABLE status within 7 days or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

L.1

LA.2

SURVEILLANCE REQUIREMENTS

4.4.2 The acoustic monitor for each safety/relief valve shall be demonstrated OPERABLE with the setpoint verified to be 0.25 of the full open noise level by performance of a:

- a. CHANNEL FUNCTIONAL TEST at least once per 31 days, and a
- b. Calibration in accordance with procedures prepared in conjunction with its manufacturer's recommendations at least once per 18 months.

LA.2

Add SR: 4.3.1

M.I.

The lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperatures and pressures.

LA.1

SR 3.4.3.1 note

Up to 2 inoperable valves may be replaced with spare OPERABLE valves with lower setpoints until the next refueling.

Initial setting shall be in accordance with the manufacturer's recommendation. Adjustment to the valve full open noise level shall be accomplished during the startup test program.

A.2

The provisions of Specification 4.0.4 are not applicable provided the surveillance is performed within 12 hours after reactor steam pressure is adequate to perform the test.

LA.2

Compliance with these requirements for the "S" SRV acoustic monitor is not required for the period beginning January 21, 1994, until the next unit shutdown of sufficient duration to allow for containment entry, not to exceed the sixth refueling and inspection outage.

A.2

DISCUSSION OF CHANGES
ITS: SECTION 3.4.3 - SAFETY/RELIEF VALVES (SRVs)

ADMINISTRATIVE

A.1 During the Susquehanna Steam Electric Station (SSES) Improved Technical Specifications (ITS) development certain wording preferences or conventions are adopted which resulted in no technical changes (either actual or interpretational) to the SSES current Technical Specifications (CTS). Editorial changes and a new numbering system are adopted to make SSES ITS consistent with the Boiling Water Reactor (BWR) Standard Technical Specifications (STS) NUREG-1433, Rev. 1.

A.2 (Unit 2 only) SSES CTS 3.4.2, footnotes "###" and "#", allows that the "S" SRV acoustic monitor is not required for the period beginning January 21, 1994, until the next unit shutdown of sufficient duration to allow containment entry and footnote # allows establishing requirements for verification during initial startup. These allowances are unique and no longer required, and therefore, were eliminated from the SSES ITS. This is an administrative change with no impact on safety because the allowance is no longer in effect.

TECHNICAL CHANGES - MORE RESTRICTIVE

M.1 SSES ITS adds a new Surveillance Requirement. SR 3.4.3.1 requires the lift setpoints of the SRVs to be verified in accordance with the Inservice Testing Program. Although SR 3.4.3.1 is currently being performed (though it is not specifically in Technical Specifications), this change is considered an additional restrictions on plant operation. This change is a more restrictive change which will have no negative impact on safety, because the surveillance test is required to ensure the Operability of components assumed to perform in the plant safety analysis.

TECHNICAL CHANGES - LESS RESTRICTIVE

LA.1 SSES CTS 3.4.2 footnote "*" requires that the lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperature and pressure. SSES ITS SR 3.4.3.1 specifies the required lift pressure for the SRVs, but does not specify the ambient conditions. This is acceptable because the criteria for the ambient condition do not impact the requirement to perform the surveillance and the requirement for the Operability of the SRVs. Therefore, these details can be defined and controlled in the SSES ITS Bases which require change control in accordance with SSES ITS 5.5.10, Bases Control Program. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. The level of safety of facility operation is unaffected by the change because there is no change in the requirement to perform the SRV lift pressure surveillance. Furthermore, NRC and PP&L resources

DISCUSSION OF CHANGES
ITS: SECTION 3.4.3 - SAFETY/RELIEF VALVES (SRVs)

TECHNICAL CHANGES - LESS RESTRICTIVE (continued)

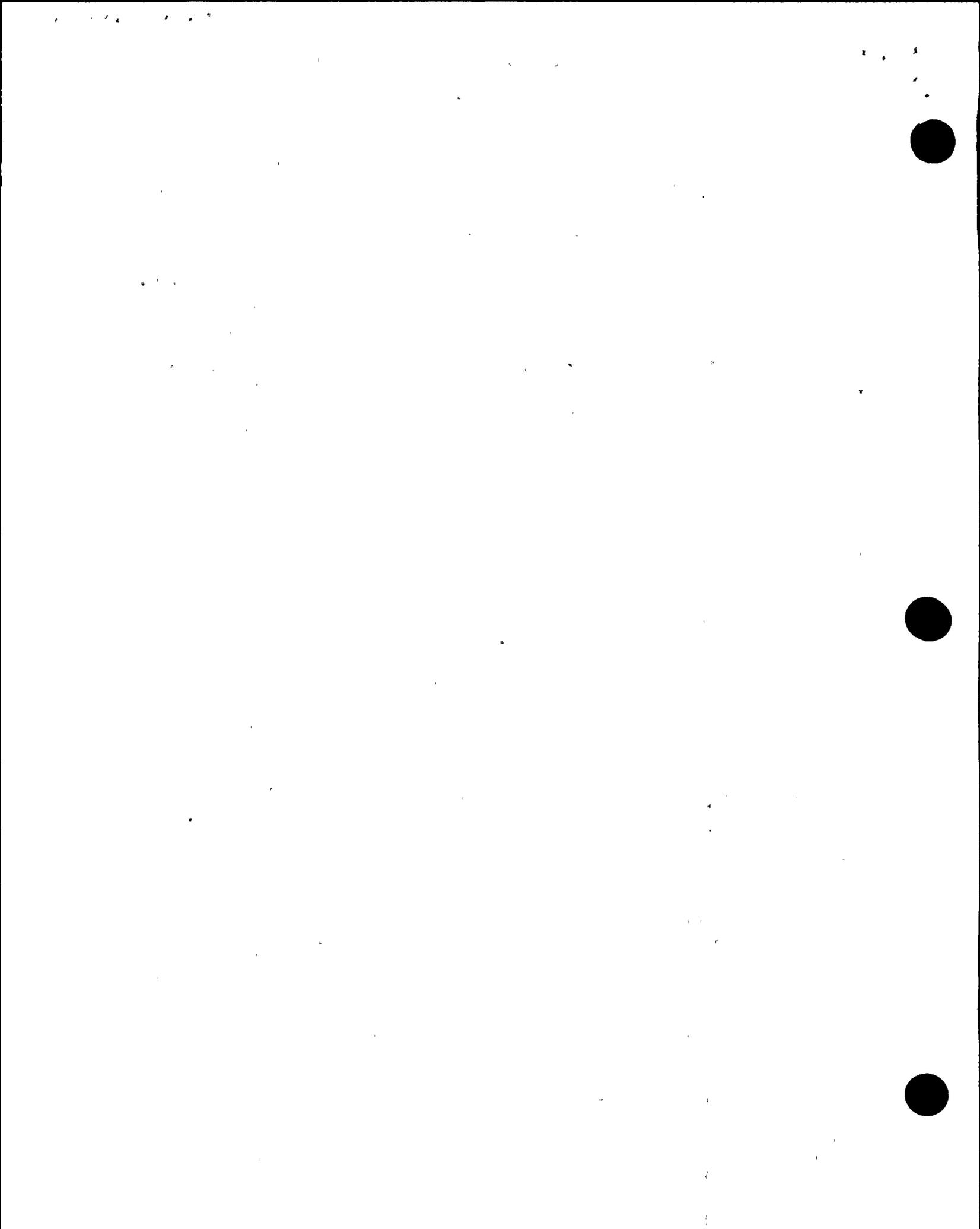
associated with processing license amendments to these requirements will be reduced. This change is a less restrictive administrative change with no impact on safety.

LA.2 SSES CTS 3/4.4.2 requires the S/RV acoustic monitors be Operable and requires the performance of a Channel Functional Test and a Calibration. The S/RV acoustic monitors provide a monitoring function only to detect an open S/RV and do not impact the Operability of the S/RVs. SSES ITS 3.4.3 requires the Operability of the S/RVs, but does not require that the acoustic monitors are Operable. This is acceptable because the requirements for the acoustic monitors do not impact the SSES ITS requirement to maintain the S/RVs Operable. Therefore, these requirements can be adequately defined and controlled in the Technical Requirement Manual. The level of safety of facility operation is unaffected by the change because there is no change in the requirement to maintain the S/RVs Operable. Furthermore, NRC and PP&L resources associated with processing license amendments to these requirements will be reduced. This change is a less restrictive administrative change with no impact on the margin of safety.

L.1 SSES CTS 3.4.2, Action b, requires the Mode Switch be placed in Shutdown in the event of a stuck open relief valve, if the stuck open relief valve is not shut within 2 minutes, or the suppression pool reaches 105 F. SSES ITS 3.4.3 maintains the requirement for Operable Safety Relief Valves, but eliminates the specific actions for a stuck open SRV. This is acceptable because SSES ITS 3.6.2.1, "Suppression Pool Temperature" and plant procedures provide operators with appropriate direction for response to a stuck open relief valve and a high suppression pool temperature. Providing specific direction to place the mode switch in shutdown within 2 minutes in technical specification does not provide additional plant protection beyond what is provided for in plant procedures and technical specifications. Therefore, this Action can be eliminated with a minimal impact on safety.

TECHNICAL SPECIFICATION BASES

The Bases of the SSES CTS for this Specification have been replaced by Bases that reflect the format and applicable content of SSES ITS 3.4.3 consistent with the BWR STS, NUREG-1433, Rev. 1.



NO SIGNIFICANT HAZARDS EVALUATION
ITS: SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

ADMINISTRATIVE CHANGES
("A" Labeled Comments/Discussions) (continued)

recirculation loop elbow tap readings are used for the measurements of this parameter. This is a clarification of intent which is consistent with current plant procedures; therefore, this change is administrative and will not impact safety.

- A.3 SSES CTS 4.4.1.2 requirement that the recirculation pumps are operating at the same speed is deleted in SSES ITS SR 3.4.2.1. This requirement is specified in SSES ITS SR 3.4.1.1 and is not required to be included as a prerequisite for jet pump surveillances. Matched loop drive flows are required during all operating modes, unless one loop is considered out of service. Since SSES ITS maintains the same requirements as the SSES CTS, this is an administrative change with no impact on safety.
- A.4 SSES CTS 3.4.1.2 applicability specifies that the LCO is only applicable when "both recirculation loops are in operation." SSES ITS 3.4.2 has no similar applicability requirement. SSES CTS 3.4.1.1.2, Action a.1.a, requires that with no recirculation pumps operating immediately place the reactor mode switch in shutdown position or SSES CTS 3.4.1.1.2, Action 2, requires in Operational Condition 2 with no reactor coolant system recirculation loops in operation...be in Hot Shutdown within 6 hours. Since SSES CTS does not allow critical operation with no recirculation pumps operating, this applicability requirement is unnecessary and the applicability of SSES ITS 3.4.2 is consistent with the intent of SSES CTS 3.4.1.2. For single loop operation, SSES CTS requires jet pump Operability through performance of SSES CTS 4.4.1.1.2.6. Although SSES ITS has no specific SR for single loop operation, SSES ITS 3.4.2 Applicability includes single loop operation and therefore, requires jet pumps to be Operable. Therefore, this change is administrative with no impact on safety.
- A.5 (Unit 2 only) SSES CTS 3.4.1.2 footnote "*" provides direction only applicable during the initial startup of the Unit. Since this direction is only applicable during initial start-up, the deletion is an administrative change with no impact on safety.

Section 3.4.3

- A.2 (Unit 2 only) SSES CTS 3.4.2, footnotes "###" and "#", allows that the "S" SRV acoustic monitor is not required for the period beginning January 21, 1994, until the next unit shutdown of sufficient duration to allow containment entry and footnote # allows establishing requirements for verification during initial startup. These allowances are unique and no longer required, and therefore, were eliminated from the SSES ITS. This is an administrative change with no impact on safety because the allowance is no longer in effect.

NO SIGNIFICANT HAZARDS EVALUATION
ITS: SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)ADMINISTRATIVE CHANGES
("A" Labeled Comments/Discussions) (continued)

- A.6 SSES CTS 4.4.1.1.2.3 footnote "****" allowing changes to the initial value due to Power Uprate testing has been deleted. Power Uprate testing is completed and the note is no longer applicable. This is an administrative change with no impact on safety.
- A.7 SSES CTS 3.4.1.4.b requires when starting a recirculation pump the Thermal power/core flow be below the 80% rod line. SSES ITS 3.4.10 does not contain this requirement. This is acceptable because SSES ITS 3.4.1, for single loop operation, requires that loop operation will be maintained below the 80% rod line. SSES ITS 3.4.1 duplicates the SSES CTS 3.4.1.4.6 requirement. Therefore, this is an administrative change with no impact on safety.
- A.8 SSES CTS 4.4.1.1.2.3 requires verification that the plant is within applicable limits when recirculation flow is $\leq 50\%$ of rated loop flow. SSES ITS SR 3.4.10.5 and SR 3.4.10.6 require that the same limits be maintained with recirculation loop flow $\leq 21,320$ gpm. This is acceptable because the 21,320 gpm is equivalent to 50% rated loop flow and "gpm" is what is read in the Control Room. Therefore, this is an administrative change with no impact on safety.
- A.9 SSES ITS SR 3.4.10.1 notes eliminate details containment in SSES CTS 3.4.6.1 to monitor limits following a nuclear shutdown and low power physics tests. This is acceptable because SSES ITS SR 3.4.10.1 notes bound all conditions described in SSES CTS 3.4.6.1. Therefore, this change is an administrative change with no impact on safety.

The bases for the determination that the proposed changes do not involve a significant hazards consideration is an evaluation of these changes against each of the criteria in 10 CFR 50.92. The criteria and the conclusions of the evaluation are presented below.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed changes consist of reformatting, renumbering, and rewording the existing Technical Specifications to establish consistency with Boiling Water Reactor (BWR) Standard Technical Specifications (STS), NUREG-1433, Rev 1. This reformatting, renumbering, and rewording involves no technical changes to the Susquehanna Steam and Electric Station (SSES) current Technical Specifications (CTS). The changes are administrative because they do not have any affect on the initiators of analyzed events and do not affect any assumptions associated with the mitigation of accident or transient events. Therefore, these changes do not involve any increase in the probability or consequences of any accident previously evaluated.

NO SIGNIFICANT HAZARDS EVALUATION
ITS: SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

ADMINISTRATIVE CHANGES
("A" Labeled Comments/Discussions) (continued)

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes will not involve any physical changes to plant systems, structures, or components (SSC), or the manner in which these SSC are operated, maintained, modified, tested, or inspected. The proposed changes will not impose or eliminate any requirements. Therefore, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does this change involve a significant reduction in a margin of safety?

The proposed changes will not reduce a margin of safety because the changes identified as Administrative were deliberately limited to those changes that have no impact on any safety analyses assumptions. Therefore, no question of safety is involved and these changes do not involve any reduction in a margin of safety.

NO SIGNIFICANT HAZARDS EVALUATION
ITS: SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

TECHNICAL CHANGES - MORE RESTRICTIVE
("M" Labeled Comments/Discussions)

Pennsylvania Power & Light Company has evaluated each of the proposed Technical Specification changes identified as "More Restrictive" in accordance with the criteria specified by 10 CFR 50.92 and has determined that the proposed changes do not involve a significant hazards consideration. This evaluation is applicable to each of the following changes:

Section 3.4.1

- M.1 SSES ITS SR 3.4.1.2 is added to verify every 24 hours that operation is outside of Regions I and II of Figure 3.4.1-1. This surveillance ensures compliance with LCO 3.4.1. This more restrictive change will have no negative impact on safety, because the SR is consistent with SSES CTS 3.4.1.1.1 and SSES CTS 3.4.1.1.2 requirements and ensures the verification will be performed at the specified frequency.

Section 3.4.3

- M.1 SSES ITS adds a new Surveillance Requirement. SR 3.4.3.1 requires the lift setpoints of the SRVs to be verified in accordance with the Inservice Testing Program. Although SR 3.4.3.1 is currently being performed (though it is not specifically in Technical Specifications), this change is considered an additional restrictions on plant operation. This change is a more restrictive change which will have no negative impact on safety, because the surveillance test is required to ensure the Operability of components assumed to perform in the plant safety analysis.

Section 3.4.4

- M.1 SSES CTS 3.4.3.2 Action e allows 12 hours to identify that the source of the increased leakage is not service sensitive Type 304 or 316 austenitic stainless steel. SSES ITS 3.4.4 Required Action B, allows only 4 hours for this determination. The 4 hour time period is a more restrictive change with no negative impact on safety, based on the fact that 4 hours provides sufficient time to perform the evaluation and the shorter time will ensure appropriate actions are taken to prevent further degradation. This change is consistent with the guidance provided in Generic Letter 88-01 supplement 1.

Section 3.4.6

- M.1 SSES CTS 3.4.3.1, Action b, requires grab samples every 24 hours. SSES ITS Required Action B.1 increases the required grab sampling frequency with no atmospheric monitoring available, to once every 12 hours. This change is consistent with the BWR STS, NUREG-1433, Revision 1 and is a more restrictive change with no negative impact on safety, based on the fact the increased atmospheric monitoring will provide greater assurance of leakage detection, without a significant impact on plant staff.

NO SIGNIFICANT HAZARDS EVALUATION
ITS: SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

TECHNICAL CHANGES - MORE RESTRICTIVE
("M" Labeled Comments/Discussions) (continued)

Section 3.4.11

- M.1 SSES CTS 3.4.6.2 applicability footnote identifying that the reactor steam dome pressure limit is not applicable during anticipated transients is deleted in SSES ITS 3.4.11. The SSES ITS are constructed with the reactor steam dome pressure limit as an operational limit. It is anticipated that anticipated transients will result in exceeding operational limits. It is further anticipated that action (either automatic or operator or both) is initiated to return the plant to acceptable steady state operation. No benefit or rationale is seen for this exception. Therefore, the reactor steam dome pressure limit is applicable during such transients, and the Required Actions should be taken as part of the mitigation of the transient. This more restrictive change will have no negative impact on safety, since it eliminates an SSES CTS exception which could be misinterpreted.

The bases for the determination that the proposed changes do not involve a significant hazards consideration is an evaluation of these changes against each of the criteria in 10 CFR 50.92. The criteria and the conclusions of the evaluation are presented below.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed changes provide requirements determined to be more conservative than the existing requirements for operation of the facility. Therefore, these changes establish or maintain adequate assurance that components are operable when necessary for the prevention or mitigation of accidents or transients and that plant variables are maintained within limits necessary to satisfy the assumptions for initial conditions in the safety analysis. Therefore, these changes do not involve any increase in the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed changes will not involve any physical changes to plant systems, structures, or components (SSC). The changes in normal plant operation are consistent with the current safety analysis assumptions. Therefore, these changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

NO SIGNIFICANT HAZARDS EVALUATION
ITS: SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

TECHNICAL CHANGES - MORE RESTRICTIVE
("M" Labeled Comments/Discussions) (continued)

3. Does this change involve a significant reduction in a margin of safety?

The imposition of more restrictive requirements either has no impact on or increases the margin of plant safety. As provided in the discussion of each of the changes, each change in this category provides additional requirements designed to enhance plant safety. Each of the changes maintains requirements within the safety analyses and licensing basis. Therefore, these changes do not involve a reduction in a margin of safety.

NO SIGNIFICANT HAZARDS EVALUATION
ITS: SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

LESS RESTRICTIVE ADMINISTRATIVE CHANGES
("LA" Labeled Comments/Discussions) (continued)

safety of facility operation is unaffected by the change because there is no change in the requirement to maintain operation outside of the restricted region. Furthermore, NRC and PP&L resources associated with processing license amendments to these requirements will be reduced. This change is a less restrictive administrative change with no impact on the margin of safety.

- LA.4 SSES CTS 3.4.1.1.2 and 4.4.1.1.2.1 limits the recirculation pump speed while in single loop operation. The flow rate is limited to restrict reactor vessel internals vibration to within acceptable limits and is not associated with the function of the Recirculation Loop Technical Specification as defined in the Bases. Therefore, the requirements for maintaining pump speed can be adequately defined and controlled in the TRM. The level of safety of facility operation is unaffected by the change because there is no change in the requirement to maintain operation outside of the restricted region. Furthermore, NRC and PP&L resources associated with processing license amendments to these requirements will be reduced. This change is a less restrictive administrative change with no impact on the margin of safety.

Section 3.4.3

- LA.1 SSES CTS 3.4.2 footnote "*" requires that the lift setting pressure shall correspond to ambient conditions of the valves at nominal operating temperature and pressure. SSES ITS SR 3.4.3.1 specifies the required lift pressure for the SRVs, but does not specify the ambient conditions. This is acceptable because the criteria for the ambient condition do not impact the requirement to perform the surveillance and the requirement for the Operability of the SRVs. Therefore, these details can be defined and controlled in the SSES ITS Bases which require change control in accordance with SSES ITS 5.5.10, Bases Control Program. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. The level of safety of facility operation is unaffected by the change because there is no change in the requirement to perform the SRV lift pressure surveillance. Furthermore, NRC and PP&L resources associated with processing license amendments to these requirements will be reduced. This change is a less restrictive administrative change with no impact on safety.

- LA.2 SSES CTS 3/4.4.2 requires the S/RV acoustic monitors be Operable and requires the performance of a Channel Functional Test and a Calibration. The S/RV acoustic monitors provide a monitoring function only to detect an open S/RV and do not impact the Operability of the S/RVs. SSES ITS 3.4.3 requires the Operability of the S/RVs, but does not require that the acoustic monitors are Operable. This is acceptable because the requirements for the acoustic monitors do not impact the SSES ITS requirement to maintain the S/RVs Operable. Therefore, these requirements can be adequately defined and controlled in the Technical

NO SIGNIFICANT HAZARDS EVALUATION
ITS: SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

LESS RESTRICTIVE ADMINISTRATIVE CHANGES
("LA" Labeled Comments/Discussions) (continued)

Requirement Manual. The level of safety of facility operation is unaffected by the change because there is no change in the requirement to maintain the S/RVs Operable. Furthermore, NRC and PP&L resources associated with processing license amendments to these requirements will be reduced. This change is a less restrictive administrative change with no impact on the margin of safety.

Section 3.4.4

- LA.1 SSES CTS 4.4.3.2.1 details the specific methods for performing the surveillance. SSES ITS SR 3.4.4.1 requires the performance of the surveillance, but does not provide specific details on the ways the surveillance can be performed. Defining the method used to determine RCS Leakage is not necessary to ensure Leakage does not exceed the LCO limits and detect a degradation of the RCPB and therefore, this information does not impact the requirement to maintain the RCPB Leakage within specified limits. Therefore, these details can be defined and controlled in the SSES ITS Bases which require change control in accordance with SSES ITS 5.5.10, Bases Control Program. This approach provides an effective level of regulatory control and provides for a more appropriate change control process. The level of safety of the facility operation is unaffected by the change because there is no change in the requirement to perform the surveillance. Furthermore, NRC and PP&L resources associated with processing license amendments to these requirements will be reduced. This change is a less restrictive administrative change with no impact on safety.
- LA.2 SSES CTS 4.4.3.2.3 requires high/low pressure interface valve leakage pressure monitors. SSES ITS 3.4.5 maintains the requirement for the Operability of the Pressure Isolation Valves (PIVs), but eliminates the requirement for maintaining the pressure monitors. The pressure monitors serve to monitor the leakage from the PIVs, but do not support the Operability of the PIVs. Therefore, these requirements can be defined and controlled in the Technical Requirements Manual. As an alarm-only function performing no automatic function, and not assumed in any event analysis, this function is not required to be retained in SSES ITS. The level of safety of facility operation is unaffected by the change because there is no change in the requirement to maintain the PIVs Operable. Furthermore, NRC and PP&L resources associated with processing license amendments to these requirements will be reduced. This change is a less restrictive administrative change with no impact on safety.

Section 3.4.5

- LA.1 SSES CTS 3.4.3.2. Table 3.4.3.2-1 provides details relating to system design and purpose (i.e., the list of PIVs). SSES ITS 3.4.5 requires the Operability of the PIVs, but does not specify the design details. This is acceptable because these design details do not impact the SSES

NO SIGNIFICANT HAZARDS EVALUATION
ITS: SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

LESS RESTRICTIVE ADMINISTRATIVE CHANGES
("LA" Labeled Comments/Discussions) (continued)

to maintain the pressure and temperature limits. Furthermore, NRC and PP&L resources associated with processing license amendments to these requirements will be reduced. This change is a less restrictive administrative change with no impact on safety.

- LA.2 SSES CTS 4.4.6.1.3 details the fluence and embrittlement determinations. The SSES CTS requirements for fluence and embrittlement determinations are contained in 10 CFR 50, Appendix H and do not need to be repeated in the SSES ITS. As stated above, these requirements are specified in 10 CFR 50, Appendix H, and therefore, cannot be changed by SSES, without prior approval from the NRC. This provides an equivalent level of regulatory control, therefore, this change is a less restrictive administrative change which has no impact on safety.

The bases for the determination that the proposed changes do not involve a significant hazards consideration is an evaluation of these changes against each of the criteria in 10 CFR 50.92. The criteria and the conclusions of the evaluation are presented below.

1. Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed changes remove from the SSES Technical Specifications items that are informational or implementing details that are adequately and more appropriately controlled by the licensee. Additionally, the proposed changes remove from the SSES Technical Specifications items that are contained in the Code of Federal Regulations or other regulatory documents and, therefore, do not need to be repeated in the SSES ITS. These requirements being moved to another controlled document or removed from Technical Specifications are not deleted or changed. Therefore, these changes will not result in any changes to the requirements specified in the SSES CTS, but will reduce the level of regulatory control on the identified requirements. The level of regulatory control has no impact on the probability or the consequences of an accident previously evaluated, therefore, these changes have no impact on the probability or consequences of an accident previously evaluated.

2. Does the change create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed changes will not involve any physical changes to plant systems, structures, or components (SSC), or the manner in which these SSC are operated, maintained, modified, tested, or inspected. The proposed changes will not impose or eliminate any requirements. Therefore, these changes do not create the possibility of a new or different kind of accident from any accident previously evaluated.

NO SIGNIFICANT HAZARDS EVALUATION
ITS: SECTION 3.4 - REACTOR COOLANT SYSTEM (RCS)

LESS RESTRICTIVE ADMINISTRATIVE CHANGES
("LA" Labeled Comments/Discussions) (continued)

3. Does this change involve a significant reduction in a margin of safety?

The margin of safety as defined in the bases of any Technical Specification is not reduced. The requirements being moved to another controlled document or removed from Technical Specifications remain the same as stated in the existing Technical Specifications. Therefore, no reduction in a margin of safety will be permitted.

Removal of these items from Technical Specifications eliminates the requirement for NRC review and approval of revisions in accordance with 10 CFR 50.92. Elimination of this administrative process does not have a margin of safety that can be evaluated. However, the proposed changes are consistent with the BWR Standard Technical Specification, NUREG-1433, Rev 1, which was approved by the NRC. Revising the Technical Specifications to reflect the approved level of detail ensures no significant reduction in the margin of safety.

ITS 3.5.1 ECCS — Operating

ITEM #	DOC or JFD#	CTS/STS LCO	Description of Issue	COMMENTS
3.5.1-1	A.3	<p>CTS 3.5.1 Action b.4</p> <p>ITS 3.5.1 Action I</p>	<p>CTS 3.5.1 footnote "*" to Action b.4 states that if Cold Shutdown cannot be established when two or more RHR subsystems are inoperable then reactor coolant temperature should be maintained as low as practical using alternate heat removal methods. ITS 3.5.1, Action I, requires entry into LCO 3.0.3 when two or more RHR subsystems are inoperable.</p>	<p>DOC A.3 states that the CTS footnote is deleted because it does not establish any additional restrictions on plant operation. The staff believes that the footnote requires establishing alternate decay heat removal methods; however, the deletion of the footnote can still be justified as an administrative change since the requirement to establish alternate decay heat removal methods when two RHR subsystems are inoperable remains in ITS 3.4.8. Please revise DOC A.3 accordingly.</p>



ITS 3.5.1 ECCS — Operating

ITEM #	DOC or JFD#	CTS/STS LCO	Description of Issue	COMMENTS
3.5.1-2	L.8 & M.2	<p>CTS 3.4.1.1.1 & 3.4.1.1.2</p> <p>ITS 3.5.1, Action A & SR 3.5.1.6</p>	<p>CTS 3.4.1.1.1, Actions c and d, and CTS 3.4.1.1.2, Actions e and f, require closing a recirculation pump discharge and/or bypass valve immediately if a valve is inoperable. Entering CTS 3.0.3 is required if the valve cannot be closed. ITS SR 3.5.1.6 requires verification that each recirculation pump discharge valve and bypass valve either cycles through one complete cycle of full travel or is de-energized in the closed position. If the SR cannot be satisfied, the associated LPCI subsystem would have to be declared inoperable and ITS 3.5.1, Action A, entered. Under ITS 3.5.1, Action A, plant operation may continue for as long as 7 days.</p> <p>The change modifies two requirements. The first is that the allowed outage time for a valve that can't be closed is changed from immediately to 7 days. The second is that the CTS require that the inoperable valve be verified in the closed position every 31 days. ITS SR 3.5.1.6 requires that the inoperable valve be verified "deenergized" in the closed position "once each startup prior to exceeding 25% RTP. No periodic frequency for verifying valve status exists in the ITS.</p>	<p>The only more restrictive portion of this change that should be addressed under M.2 is the requirement to de-energize the valve in the closed position. The less restrictive portions which should be addressed under L.8 include the change in the allowed outage time for a valve that cannot be closed and the removal of the periodic requirement to verify valve position every 31 days. The DOCs will be restructured in the safety evaluation to appropriately address the more restrictive and less restrictive aspects of this change. No licensee action is required.</p>

ITS 3.5.1 ECCS — Operating

ITEM #	DOC or JFD#	CTS/STS LCO	Description of Issue	COMMENTS
3.5.1-3	LA.3	CTS 3.8.3.1.a.1.c & 3.8.3.1.a.2.c ITS SR 3.5.1.5	The CTS markup identifies DOC LA.3 to justify the deletion of the details associated with the isolated 480V swing bus.	DOC LA.3 for ITS 3.5.1 does not address this change. Please provide an appropriate DOC reference for this change.
3.5.1-4	P.3	STS Bases for SR 3.5.1.12 ITS Bases for SR 3.5.1.12	The sentence "However, the requirements of SR 3.5.1.12 are met by a successful performance at any pressure," has been added to the STS Bases description.	The STS markup references JFD P.3 for this change. P.3 only addresses changes to the Bases for SR 3.5.1.11. Please provide a JFD for the change to the Bases for SR 3.5.1.12, keeping in mind that the proposed change is a generic change and addressing any plant-specific reason for SSES to make the change.
3.5.1-5	No JFD	STS Bases for SR 3.5.1.10 ITS Bases for SR 3.5.1.10	The STS markup for SR 3.5.1.10 shows the first sentence of the second paragraph modified as follows: The 1824 month Frequency is based on the need to perform the Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power acceptable because	No JFD is referenced to justify this change. Please provide a JFD reference.



ITS 3.5.2 ECCS — Shutdown

ITEM #	DOC or JFD#	CTS/STS LCO	Description of Issue	COMMENTS
3.5.2-1	A.7	<p>CTS 3.5.3.b</p> <p>ITS 3.5.2, Actions A & B</p>	<p>CTS 3.5.3.b requires immediate suspension of OPDRVs if one of the two CS subsystems becomes inoperable in Mode 4 or 5 when the suppression pool is drained or less than the required limit. ITS 3.5.2, Actions A & B, allow 4 hours to suspend OPDRVs when one of the required CS subsystems becomes inoperable.</p>	<p>Please explain why this is not justified as a less restrictive change, given the change in time for suspension of OPDRVs from immediately to within 4 hours.</p>
3.5.2-2	L.3	<p>CTS 3.8.3.2.a.1.c, 3.8.3.2.a.2.c, & 4.8.3.2.2</p> <p>ITS 3.5.2</p>	<p>CTS 3.8.3.2.a.1.c, 3.8.3.2.a.2.c, 3.8.3.2, Action f, & 4.8.3.2.2 requirements associated with the Isolated 480 AC swing bus in Mode 4 and 5 are deleted in the ITS. CTS 3.8.3.2, Action f, requires declaring the LPCI system inoperable when the isolated swing bus is inoperable. It appears the swing power bus acts as a backup power source to the normal source. The ITS deletes the requirement for declaring the applicable LPCI inoperable when the swing bus is inoperable.</p>	<p>Explain what is meant by the statement, "Since SSES ITS Bases permits only one LPCI pump in a subsystem to be used to satisfy the requirements of LCO 3.5.2, <u>each component in the flow path is required to have a power supply and testing of the Isolated 480 AC swing bus is not required.</u>" The staff is having difficulty following the logic. Also, CTS 3.8.3.2.a.1.c and 3.8.3.2.a.2.c required the operability of the Isolated 480 AC swing bus in Modes 4 & 5 only "if the division I (II) LPCI subsystem 'alone' is fulfilling the requirements of Specification 3.5.2." How is this possible when Specification 3.5.2 requires <u>two</u> ECCS subsystems to be operable? Additional explanation of why operability of the Isolated 480 AC swing bus is not required to support LPCI operability in Modes 4 and 5 is needed</p>



ITS 3.5.3 RCIC System

ITEM #	DOC or JFD#	CTS/STS LCO	Description of Issue	COMMENTS
3.5.3-1	LA.4 JFD P.2	CTS 4.7.3.b ITS SR 3.5.3.3	CTS 4.7.3.b specifies performing RCIC testing at a frequency of 92 days, consistent with the STS. ITS SR 3.5.3.3 references the Inservice Testing Program for the testing frequency. The justification did not justify deviating from the STS specified frequency of 92 days.	Was there a reason that RCIC testing frequency was specified as 92 days in the CTS and all ECCS testing frequencies were specified as in accordance with the IST Program? This is both a change to the CTS and a change to the STS, which appears to be a generic change. Please justify the change on a plant-specific basis or submit a generic STS change to the TSTF.

ITS 3.5.1 ECCS — Operating

ITEM #	DOC or JFD#	CTS/STS LCO	Description of Issue	COMMENTS
3.5.1-1	A.3	<p>CTS 3.5.1 Action b.4</p> <p>ITS 3.5.1 Action I</p>	<p>CTS 3.5.1 footnote "*" to Action b.4 states that if Cold Shutdown cannot be established when two or more RHR subsystems are inoperable then reactor coolant temperature should be maintained as low as practical using alternate heat removal methods. ITS 3.5.1, Action I, requires entry into LCO 3.0.3 when two or more RHR subsystems are inoperable.</p>	<p>DOC A.3 states that the CTS footnote is deleted because it does not establish any additional restrictions on plant operation. The staff believes that the footnote requires establishing alternate decay heat removal methods; however, the deletion of the footnote can still be justified as an administrative change since the requirement to establish alternate decay heat removal methods when two RHR subsystems are inoperable remains in ITS 3.4.8. Please revise DOC A.3 accordingly.</p>



ITS 3.5.1 ECCS — Operating

ITEM #	DOC or JFD#	CTS/STS LCO	Description of Issue	COMMENTS
3.5.1-2	L.8 & M.2	<p>CTS 3.4.1.1.1 & 3.4.1.1.2</p> <p>ITS 3.5.1, Action A & SR 3.5.1.6</p>	<p>CTS 3.4.1.1.1, Actions c and d, and CTS 3.4.1.1.2, Actions e and f, require closing a recirculation pump discharge and/or bypass valve immediately if a valve is inoperable. Entering CTS 3.0.3 is required if the valve cannot be closed. ITS SR 3.5.1.6 requires verification that each recirculation pump discharge valve and bypass valve either cycles through one complete cycle of full travel or is de-energized in the closed position. If the SR cannot be satisfied, the associated LPCI subsystem would have to be declared inoperable and ITS 3.5.1, Action A, entered. Under ITS 3.5.1, Action A, plant operation may continue for as long as 7 days.</p> <p>The change modifies two requirements. The first is that the allowed outage time for a valve that can't be closed is changed from immediately to 7 days. The second is that the CTS require that the inoperable valve be verified in the closed position every 31 days. ITS SR 3.5.1.6 requires that the inoperable valve be verified "deenergized" in the closed position "once each startup prior to exceeding 25% RTP. No periodic frequency for verifying valve status exists in the ITS.</p>	<p>The only more restrictive portion of this change that should be addressed under M.2 is the requirement to de-energize the valve in the closed position. The less restrictive portions which should be addressed under L.8 include the change in the allowed outage time for a valve that cannot be closed and the removal of the periodic requirement to verify valve position every 31 days. The DOCs will be restructured in the safety evaluation to appropriately address the more restrictive and less restrictive aspects of this change. No licensee action is required.</p>

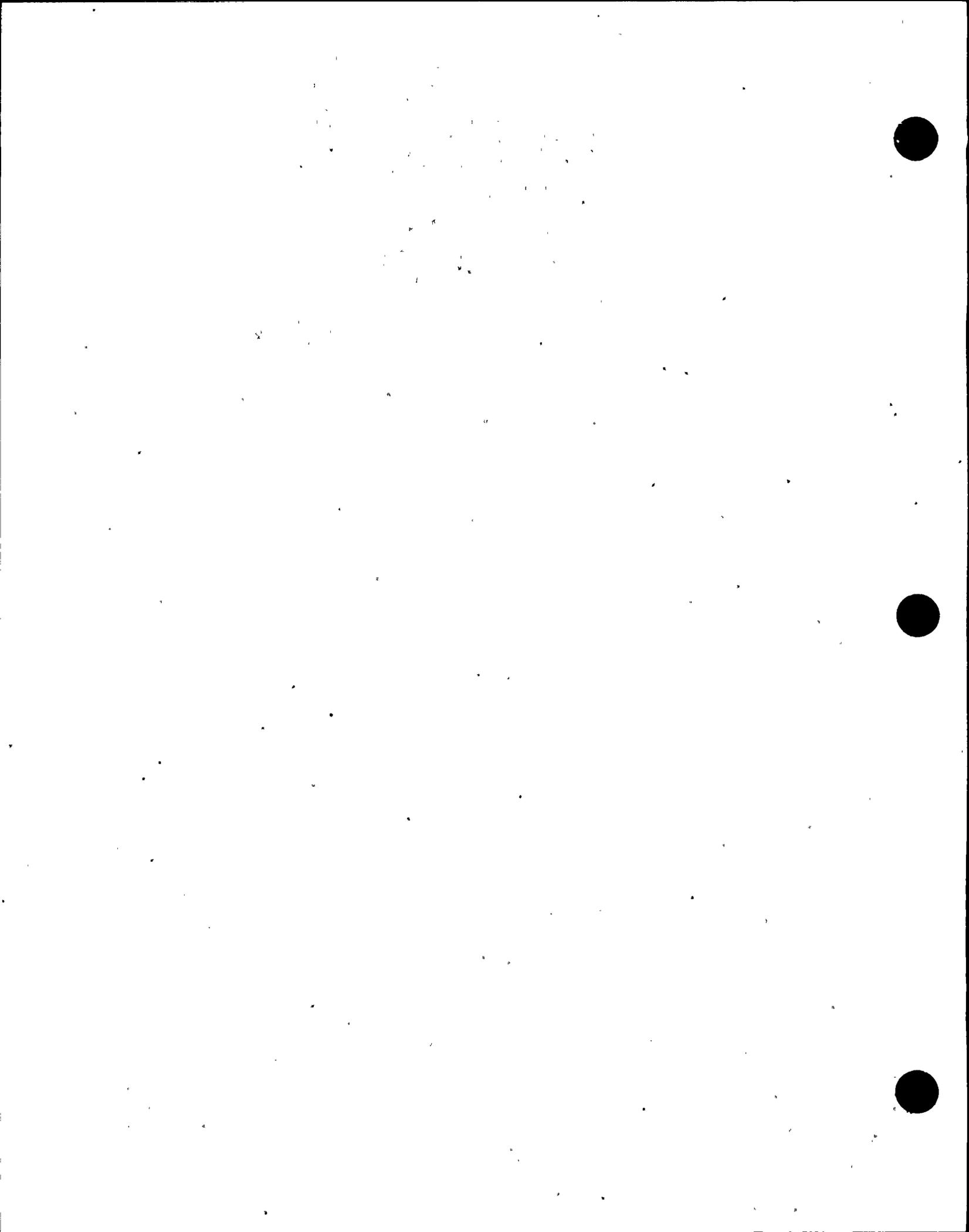
ITS 3.5.1 ECCS — Operating

ITEM #	DOC or JFD#	CTS/STS LCO	Description of Issue	COMMENTS
3.5.1-3	LA.3	CTS 3.8.3.1.a.1.c & 3.8.3.1.a.2.c ITS SR 3.5.1.5	The CTS markup identifies DOC LA.3 to justify the deletion of the details associated with the isolated 480V swing bus.	DOC LA.3 for ITS 3.5.1 does not address this change. Please provide an appropriate DOC reference for this change.
3.5.1-4	P.3	STS Bases for SR 3.5.1.12 ITS Bases for SR 3.5.1.12	The sentence "However, the requirements of SR 3.5.12 are met by a successful performance at any pressure," has been added to the STS Bases description.	The STS markup references JFD P.3 for this change. P.3 only addresses changes to the Bases for SR 3.5.1.11. Please provide a JFD for the change to the Bases for SR 3.5.1.12, keeping in mind that the proposed change is a generic change and addressing any plant-specific reason for SSES to make the change.
3.5.1-5	No JFD	STS Bases for SR 3.5.1.10 ITS Bases for SR 3.5.1.10	The STS markup for SR 3.5.1.10 shows the first sentence of the second paragraph modified as follows: The 1824 month Frequency is based on the need to perform the Surveillance under the conditions that apply during a plant outage and the potential for an unplanned transient if the Surveillance were performed with the reactor at power acceptable because	No JFD is referenced to justify this change. Please provide a JFD reference.



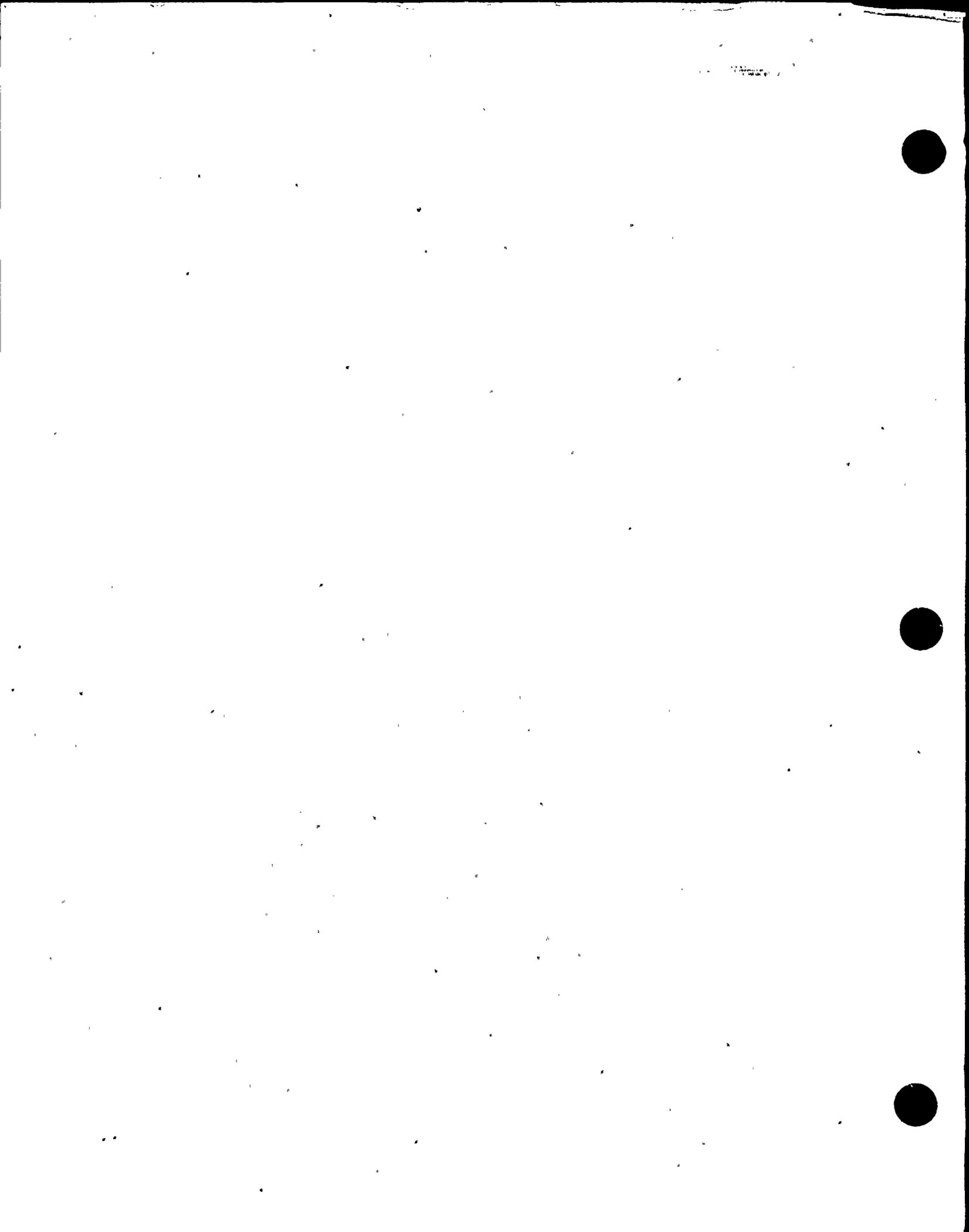
ITS 3.5.2 ECCS — Shutdown

ITEM #	DOC or JFD#	CTS/STS LCO	Description of Issue	COMMENTS
3.5.2-1	A.7	<p>CTS 3.5.3.b</p> <p>ITS 3.5.2, Actions A & B</p>	<p>CTS 3.5.3.b requires immediate suspension of OPDRVs if one of the two CS subsystems becomes inoperable in Mode 4 or 5 when the suppression pool is drained or less than the required limit. ITS 3.5.2, Actions A & B, allow 4 hours to suspend OPDRVs when one of the required CS subsystems becomes inoperable.</p>	<p>Please explain why this is not justified as a less restrictive change, given the change in time for suspension of OPDRVs from immediately to within 4 hours.</p>
3.5.2-2	L.3	<p>CTS 3.8.3.2.a.1.c, 3.8.3.2.a.2.c, & 4.8.3.2.2</p> <p>ITS 3.5.2</p>	<p>CTS 3.8.3.2.a.1.c, 3.8.3.2.a.2.c, 3.8.3.2, Action f, & 4.8.3.2.2 requirements associated with the Isolated 480 AC swing bus in Mode 4 and 5 are deleted in the ITS. CTS 3.8.3.2, Action f, requires declaring the LPCI system inoperable when the isolated swing bus is inoperable. It appears the swing power bus acts as a backup power source to the normal source. The ITS deletes the requirement for declaring the applicable LPCI inoperable when the swing bus is inoperable.</p>	<p>Explain what is meant by the statement, "Since SSES ITS Bases permits only one LPCI pump in a subsystem to be used to satisfy the requirements of LCO 3.5.2, <u>each component in the flow path is required to have a power supply and testing of the Isolated 480 AC swing bus is not required.</u>" The staff is having difficulty following the logic. Also, CTS 3.8.3.2.a.1.c and 3.8.3.2.a.2.c required the operability of the Isolated 480 AC swing bus in Modes 4 & 5 only "if the division I (II) LPCI subsystem 'alone' is fulfilling the requirements of Specification 3.5.2." How is this possible when Specification 3.5.2 requires <u>two</u> ECCS subsystems to be operable? Additional explanation of why operability of the Isolated 480 AC swing bus is not required to support LPCI operability in Modes 4 and 5 is needed</p>



ITS 3.5.3 RCIC System

ITEM #	DOC or JFD#	CTS/STS LCO	Description of Issue	COMMENTS
3.5.3-1	LA.4 JFD P.2	CTS 4.7.3.b ITS SR 3.5.3.3	CTS 4.7.3.b specifies performing RCIC testing at a frequency of 92 days, consistent with the STS. ITS SR 3.5.3.3 references the Inservice Testing Program for the testing frequency. The justification did not justify deviating from the STS specified frequency of 92 days.	Was there a reason that RCIC testing frequency was specified as 92 days in the CTS and all ECCS testing frequencies were specified as in accordance with the IST Program? This is both a change to the CTS and a change to the STS, which appears to be a generic change. Please justify the change on a plant-specific basis or submit a generic STS change to the TSTF.



SSES ITS 3.6.1.1 PRIMARY CONTAINMENT

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.1-1	A4 JFD P1 JFD P3	CTS 4.6.1.1 CTS 4.6.2.1.d ITS SR 3.6.1.1.1 STS SR 3.6.1.1.1 ITS 3.6.1.1.2	CTS 4.6.1.1 contains details which are found in 10 CFR 50 Appendix J including the description of the test method or requirements to perform the tests. The STS requires the visual examination and leakage rate testing be performed in accordance with 10 CFR 50 Appendix J as modified by approved exemptions. The ITS modifies this requirement to "in accordance with the Primary Containment Leakage Rate Testing Program." Staff SEs issued July 2, 1996, and September 6, 1996, converts the CTS from 10 CFR 50 Appendix J Option A to 10 CFR 50 Appendix J Option B for Type A, B, and C tests. Changes to the STS with regards to Option A versus Option B are covered by a letter from Mr. Christopher I. Grimes to Mr. David J. Modeen, NEI dated 11/2/95 and TSTF 52. The ITS is not in conformance with the letter or TSTF as modified by staff comments.	1/21/97		Licensee to update submittal with regards to 11/2/95 letter and updated TSTF 52 when OG provides revision or provide additional justification for deviations.

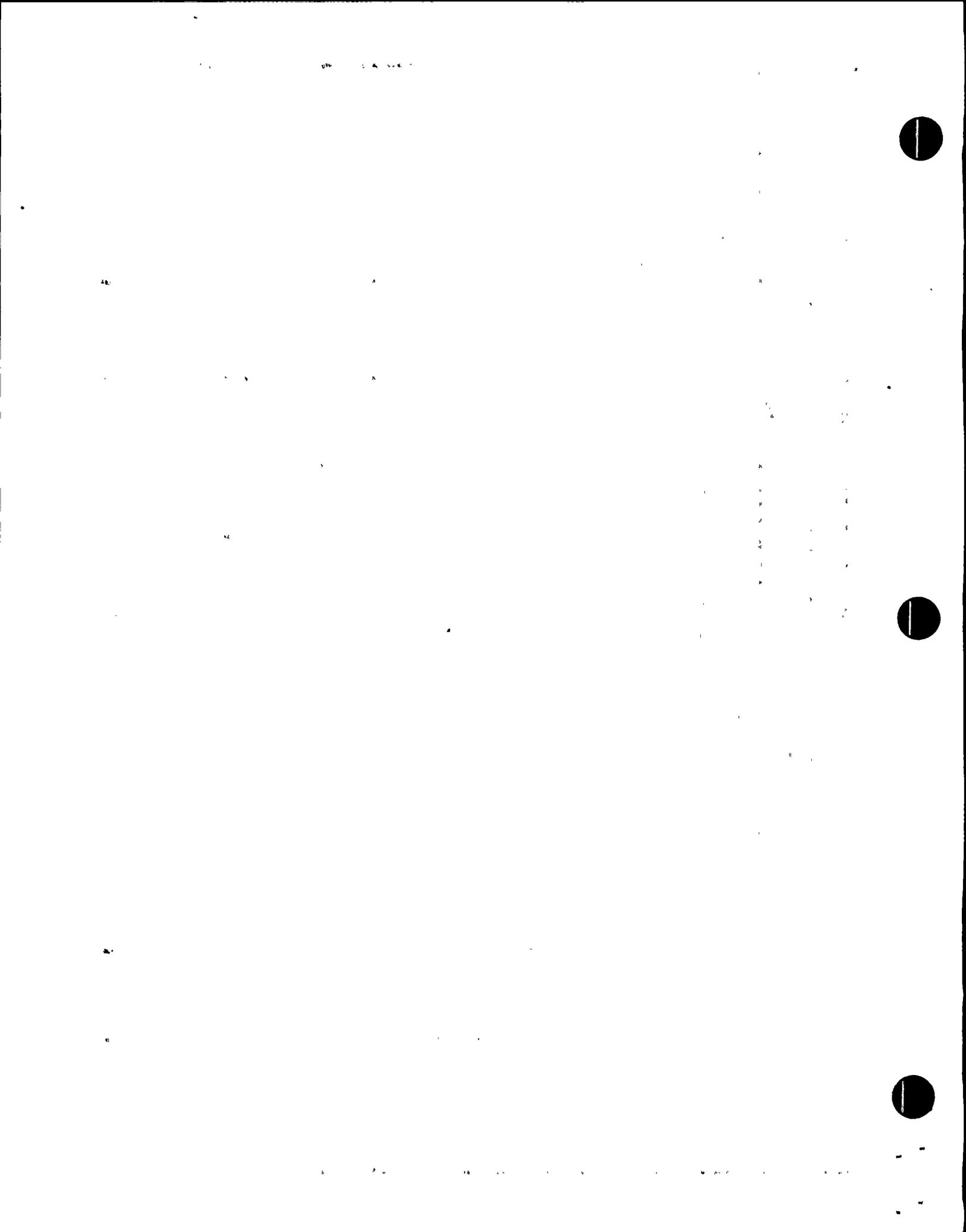


SSES ITS 3.6.1.1 PRIMARY CONTAINMENT

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.1.-2	A5 L1	CTS 3.6.2.1.	Justification A5 states that the drywell-to-suppression chamber leakage reporting requirement is not included in the ITS. The CTS markup for ITS 3.6.1.1 does not contain an A5 for the drywell-to-suppression chamber leakage reporting requirement. An item marked L1 on CTS pg 3/4.6.14 implies a report must be submitted for staff approval. However, there is no L1 in the DOCs for ITS 3.6.1.1. Since CTS 4.6.2.1 also applies to ITS 3.6.2.1 and 3.6.2.2, a review of the discussion of changes shows an L1 for both of those specifications but neither justification corresponds to the changes in CTS 4.6.2.1.2.	1/21/97		Provide the appropriate marked up CTS pages for A5, and provide an appropriate justification for L1.

SSES ITS 3.6.1.1 PRIMARY CONTAINMENT

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.1-3	A6 JFD P2	CTS 3.6.2.1.b ITS SR 3.6.1.1.2	CTS 3.6.2.1.b requires the suppression chamber bypass leakage to be less than or equal to 10% of the acceptable design valve of 0.0535 ft. ² ITS SR 3.6.1.1.2 just requires the bypass leakage to be less than the acceptable valve of 0.0535 ft. ² . No justification is given for dropping the limit or 10%. This change would be less restrictive than the current requirement.	1/21/97		Provide justification and appropriate documentation for this less restrictive change.
3.6.1.1.-4	A7	CTS 3.6.2.1 ACTION e	CTS 3.6.2.1 ACTION e requires that the drywell-to-suppression chamber bypass leakage be restored to within limits. This change is justified as administrative change A7 for ITS 3.6.1.1. No A7 is provided.	1/21/97		Provide the appropriate administrative change justification for A7.
3.6.1.1-5	M1	CTS 3.6.1.2 ACTION	See Item Number 3.6.1.3-4	1/21/97		See Item Number 3.6.1.3-4



SSFS ITS 3.6.1.1 PRIMARY CONTAINMENT

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.1-6	LA1 LA3	CTS 3.6.1.2.b CTS 3.6.1.2 ACTION b	<p>CTS Table 3.6.3-1 identifies all primary containment isolation valves. The table has been removed from the ITS. CTS 3.6.1.2.b, ACTION "with:" b and ACTION "restore:" b reference ITS Table 3.6.3-1. These CTS items are labeled ITS SR 3.6.1.1.1, ITS LCO 3.6.1.1 Condition A and ITS LCO 3.6.1.1 RA A.1 respectively. For Unit 1, the changes to CTS 3.6.1.2.b and ACTION "with:" b are designated LA1 and to ACTION "restore:" b are designated LA3. For Unit 2 changes to CTS 3.6.1.2.b has no designation, to ACTIONS "with:" b and "restore:" b are designated LA1. LA1 and LA3 only apply to ITS 3.6.1.3 not to ITS 3.6.1.1. In addition LA3 discusses changes to MSIVs not CTS Table 3.6.3-1. All the changes to CTS 3.6.1.2.b and ACTION b should be labeled LA1. In addition LA1 applies to both ITS 3.6.1.1 and 3.6.1.3.</p> <p>Furthermore CTS Table 3.6.3-1 has been relocated to the ITS Bases (for design details) and Technical Requirements Manual (TRM) (for</p>	1/21/97		<p>Provide a justification LA 1 for ITS 3.6.1.1, and correct the labeling for CTS markup.</p> <p>Provide a discussion and justification of how changes to the TRM are controlled.</p>



SSES ITS 3.6.1.1 PRIMARY CONTAINMENT

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			program notes) LA1 states that both documents are controlled by ITS 5.5.10 "Bases Control Program." ITS 5.5.10 only controls changes to the Bases not the TRM.			Also provide a discussion on why the Design Details and Program Notes need to be in separate documents.
3.6.1.1-7	LB1	CTS 4.6.2.1.e ITS 3.6.1.1.3	LB1 states that ITS SR 3.6.1.1.3 requires verifying, every 24 months, the total drywell-to-suppression chamber vacuum breaker leakage. CTS 4.6.2.1.e requires the vacuum breaker test every refueling outage. This change increases the FREQUENCY of this test from 18 months to 24 months. However, CTS 4.6.2.1.e does not show any changes and there is no LB1 in ITS 3.6.1.1.	1/21/97		Provide the appropriate marked up pages for LB1.



SSES ITS 3.6.1.2 PRIMARY CONTAINMENT AIR LOCK						
ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.2-1	A4	CTS 3.6.1.3 ACTION a.1 and ACTION b.	CTS 3.6.1.3, ACTIONS a.1 and ACTION b, require maintaining one air lock door closed. ITS 3.6.1.2 RA A.1, B.1, and C.1 require verifying the OPERABLE door is closed within 1 hour. Requiring verification that the door is closed is more restrictive.	1/21/97		Provide justification and documentation for this more restrictive change.
3.6.1.2-2	L2	CTS 3.6.1.3 ACTIONS ITS B.6.1.2 ACTION B	ITS 3.6.1.2 ACTION B is added to address a situation where the air lock interlock mechanism is inoperable. The justification states that this is consistent with CTS 3.6.1.3 ACTION a and that the change is less restrictive. This is incorrect. If it was consistent with CTS 3.6.1.3 ACTION a then the change would be administrative. However, since an inoperable air lock interlock mechanism does not make the air lock door inoperable, but the air lock inoperable, CTS 3.6.1.3 ACTION b is entered instead. Therefore, ITS 3.6.1.2 ACTION B is less restrictive than CTS 3.6.1.3 ACTION b.	1/21/97		Provide additional justification and documentation for this less restrictive change.

SSES ITS 3.6.1.2 PRIMARY AIR LOCK CONTAINMENT

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.2-3	L4	CTS 4.6.1.3 **Footnote	CTS 4.6.1.3 footnote "***" allows that the inner door need not be opened to demonstrate OPERABILITY of the primary containment airlock interlock when the primary containment is inserted. ITS 3.6.1.2, Required Actions A.3 and B.3, allow the air lock door to be verified locked, closed by administrative means, if they are located in a high radiation area or access is limited due to inerting. Verification that a door is locked closed are RAs if a door or interlock are inoperable. This footnote only applies to demonstration of airlock interlock mechanism OPERABILITY and does not apply to verifying a locked airlock door.	1/21/97		Provide justification and documentation for adding notes to RA A.3 and B.3.

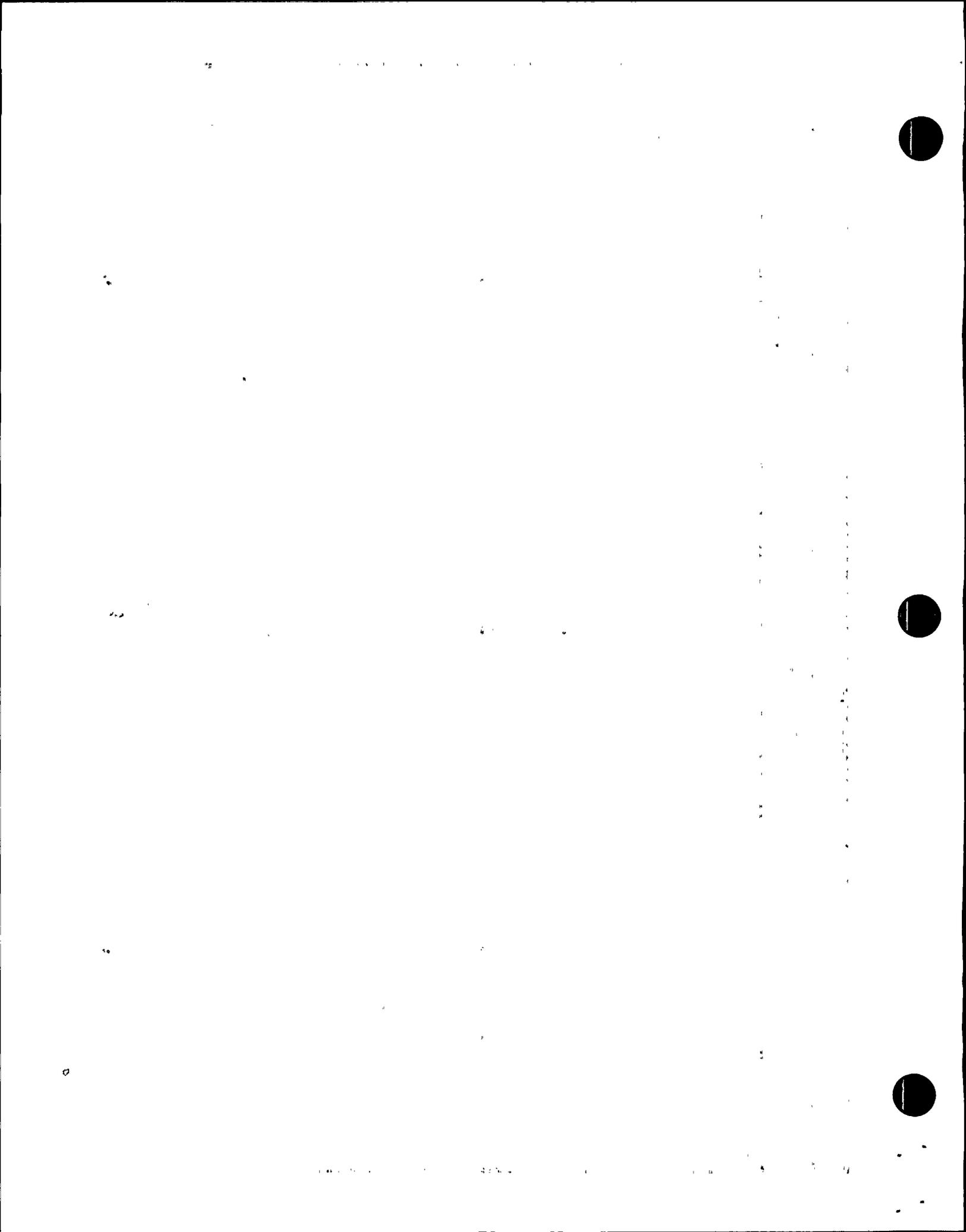


SSES ITS 3.6.1.2 PRIMARY CONTAINMENT AIR LOCK

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.2-4	L4 JFD P4 and JFD P5	CTS 4.6.1.3, CTS 4.6.1.3 **Footnote ITS SR 3.6.1.2.2 and Associated Bases	ITS SR 3.6.1.2.2 requires verifying OPERABILITY of the air lock interlock every 24 months. CTS 4.6.1.3c requires verifying OPERABILITY of the air lock interlock every 6 months. STS SR 3.6.1.2.2 requires verifying OPERABILITY of the air lock interlock every 184 days. This change increases the frequency from the CTS and deviates from the STS. No discussion is provided for increasing the frequency from the CTS. In addition, the NOTE associated with ITS SR 3.6.1.2.2 has been modified. The justification for the deviations are based on TSTF-17. The ITS and Associated Bases are not in conformance with TSTF 17.	1/21/97		Licensee to update submittal to conform with TSTF 17 or provide additional justifications for any deviations.
3.6.1.2-5	JFD P3	ITS B3.6.1.2 Bases - ACTIONS	The licensee has modified the descriptive wording to ACTION Note 2 and RA Note 2 to clarify the meaning of the Notes. The modifications do not clarify the current STS wording and in the care of the RA Note changes the meaning to allow unlimited time to repair the air lock door.	1/21/97		The STS wording should be retained.

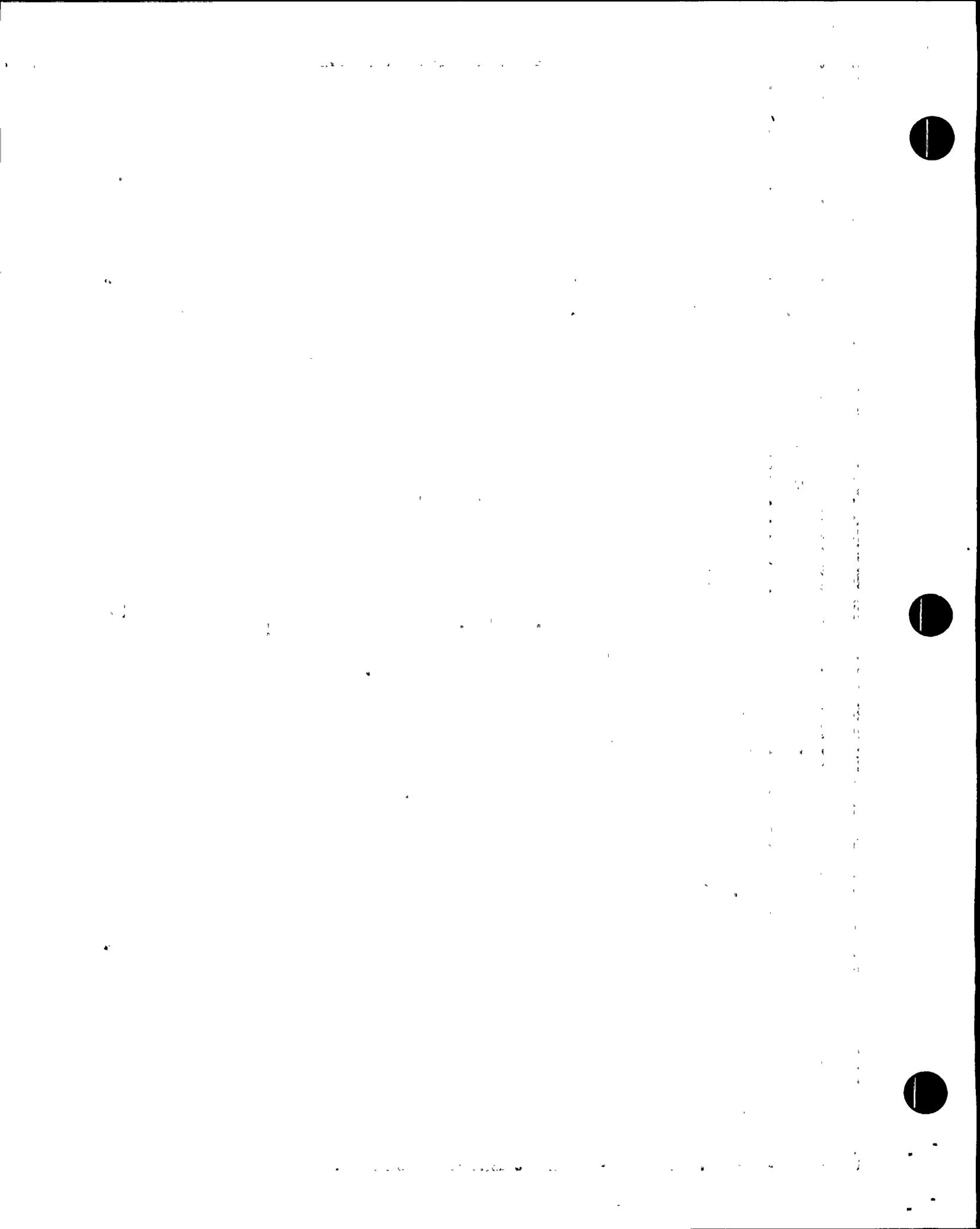
SSES ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-1	A2	CTS Table 3.6.3-1 *Footnote	Unit 1 CTS Table 3.6.3-1* footnote provides an OPERABILITY restriction on valve number HPCI HV-155F002 between May 23, 1987 and September 12, 1987. Justification A2 deletes this footnote on the basis that it is no longer applicable for Unit 1. Unit 2 Table 3.6.3-1 has a similar type of footnote for valve number RWCU HV-244 F001. This note is shown as deleted and marked A.2. However, no justification is provided for this deletion.	1/21/97		Provide a justification for the deletion of Unit 2 Table 3.6.3-1 * footnote.
3.6.1.3-2	A7	CTS 3.6.3 ACTION b	CTS 3.6.3, ACTION b, identifies that provisions of CTS 3.0.3 are not applicable. ITS 3.6.1.3 ACTION C does not contain this provision. The justification provided is that ITS 3.0.3 is only applicable in MODES 1, 2, and 3. However, CTS 3.6.3 is also applicable in MODES 1,2, and 3. The justification is inadequate, confusing, and seems to be a more restrictive change.	1/21/97		Provide additional justification for this change.



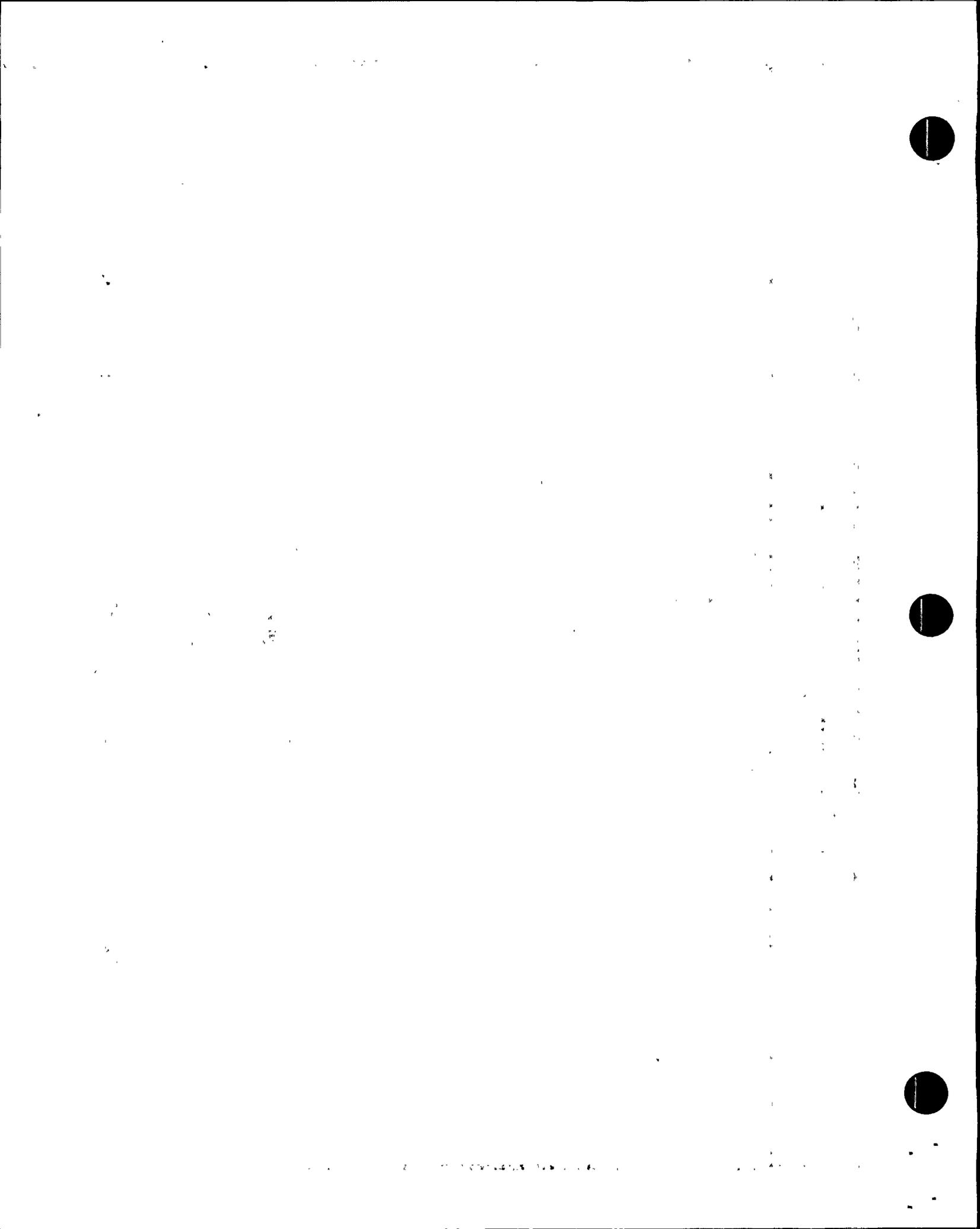
SSES ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-3	M1 JFD P3	CTS 3.6.1.2 ITS SR 3.6.1.3.12 Note	CTS 3.6.1.2 indicates that ITS SR 3.6.1.3.12 Note is added. This change is designated M1. The note is added to conform to the Bases description for this surveillance. The description for the change provided in M1 does not correspond to this change.	1/21/97		Provide adequate justification for adding this more restrictive change.
3.6.1.3-4	M1	CTS 3.6.1.2 ACTIONS	The ACTIONS for CTS 3.6.1.2 require that with the conditions of the LCO not met, one restore the conditions "Prior to increasing reactor coolant system temperature above 200° F." This change is designated as more restrictive and only applies to CTS 3.6.1.1. This is in error. Because the ACTION statements apply not only to containment but to PCIVs as well, this justification needs to be included in this section.	1/21/97		Revise the DOCs for ITS 3.6.1.3 to include this more restrictive change.



SSES ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-5	M1	CTS 3.6.3 APPLICABILITY and ACTIONS ITS 3.6.1.3 APPLICABILITY and ACTION G	CTS 3.6.3 adds ITS 3.6.1.3 APPLICABILITY--"When associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, Primary Containment Isolation Instrumentation," which adds a MODE 4 and 5 requirement to the RHR Shutdown Cooling System isolation valves. In addition, ITS 3.6.1.3, ACTION G, is added to identify appropriate actions when these valves cannot be isolated or restored within the applicable Completion Time, and the unit is already in MODE 4 or 5. These changes are shown for Unit 1; however, for Unit 2, the ACTION Statement is shown as ACTION F.	1/21/97		Correct this discrepancy.
3.6.1.3-6	M3	CTS 3/4.6.3 ITS SR 3.6.1.3.10	CTS 3/4.6.3 adds ITS SR 3.6.1.3.10 which requires removal and testing of the explosive squib from each shear isolation valve of the TIP system. STS 3.6.1.3.11 requires this test on an [18] month frequency. No justification has been provided to justify the change in frequency from 18 months to 24 months in ITS 3.6.1.3.10.	1/21/97		Provide additional justification to justify this change in frequency.



SSES ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)						
ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-7	LA1 LA3	CTS 3.6.1.2.b CTS 3.6.1.2 ACTION b	See item number 3.6.1.1-6	1/21/97		See item number 3.6.1.1-6
3.6.1.3-8	LA3 JPD P3	CTS 3.6.1.2	CTS 3.6.1.2 ACTION C requires the MSIVs to be restored to ≤ 11.5 scfh for any MSIV that exceeds 100 scfh. ITS 3.6.1.3 ACTIONS require the MSIVs to be restored to OPERABLE status, but does not impose further restoration requirements. The discussion states that the requirement to restore the MSIV leakage to ≤ 11.5 Scfh is a commitment beyond the ITS and CTS OPERABILITY requirements for MSIVs. This is incorrect. License Amendment 151 for Unit 1 and 121 for Unit 2 and the associated SE dated August 15, 1995, implemented this change. This change was found acceptable as an alternative to the recommendations in Regulatory Guide 1.96 and therefore it is a commitment that must be met.	1/21/97		This change constitutes a beyond scope of review for the conversion. Revise the ITS to conform to the CTS.

SSES ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-9	LB3	CTS 4.6.1.2.f	CTS 4.6.1.2.f requires leak testing the MSIVs on an 18 month frequency. This was changed in Amendment 158 for Unit 1 and 129 for Unit 2, dated July 2, 1996, to be in accordance with the Primary Containment Leakage Rate Program. This change is not shown anywhere in the CTS markup for ITS 3.6.1.3. There is a CTS markup section after ITS 3.6.1.1 which shows CTS 4.6.1.2.f being relocated but with no frequency changes.	1/21/97		Provide the appropriate CTS marked up pages in the appropriate sections and provide any additional justifications that may be necessary for these markups.
3.6.1.3-10	LB4	CTS 4.6.1.2.g	CTS 4.6.1.2.g requires leak testing of PCIVs in hydrostatically tested lines on an 18 month frequency. This was changed in Amendment 158 for Unit 1 and 129 for Unit 2, dated July 2, 1996 to be in accordance with the Primary Containment Leakage Rate Program. This change is not shown anywhere in the CTS markup for ITS 3.6.1.3. There is a CTS markup section after ITS 3.6.1.1 which shows CTS 4.6.1.2.g being relocated but with no frequency changes.	1/21/97		Provide the appropriate CTS marked up pages in the appropriate sections and provide any additional justifications that may be necessary for these markups.

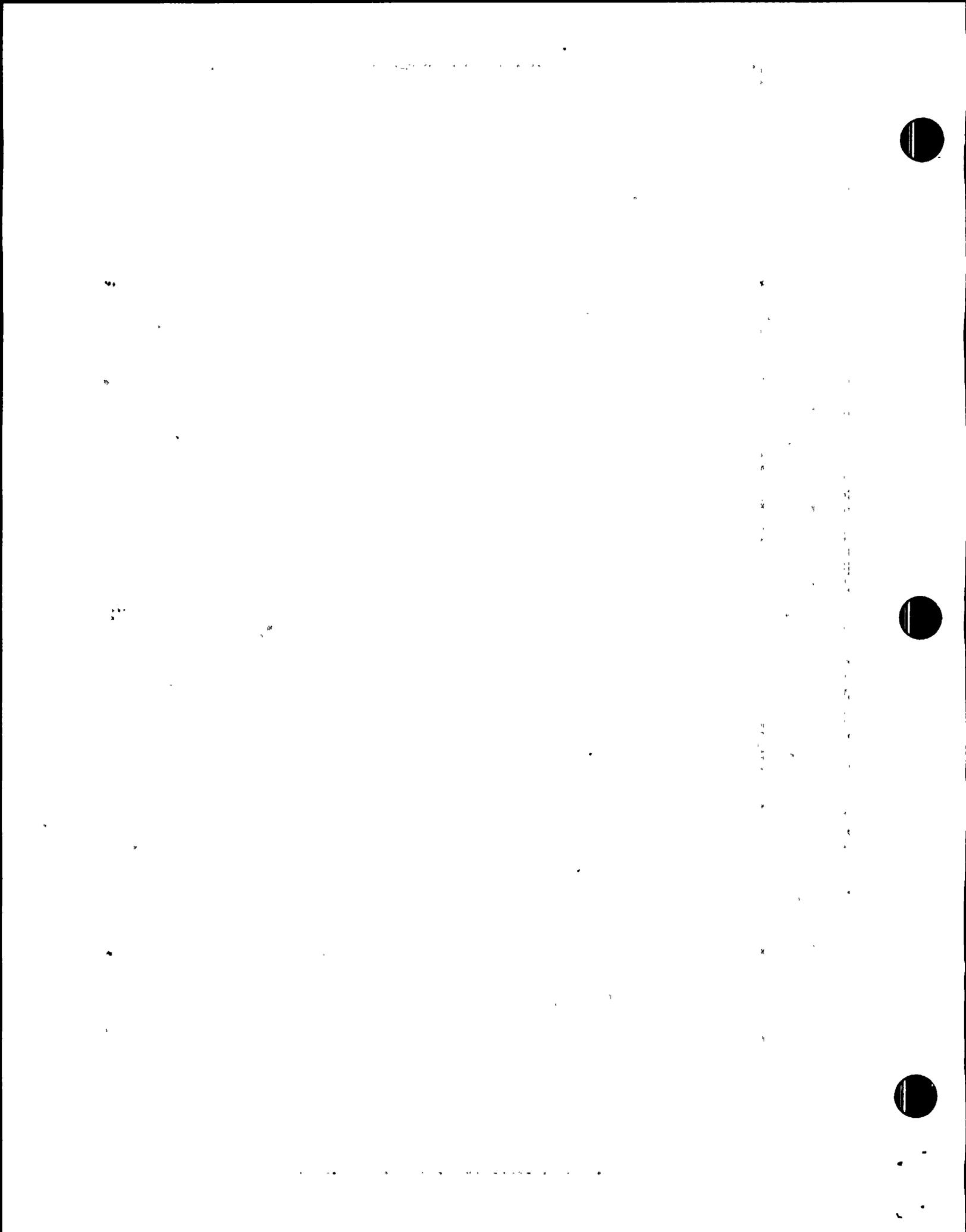
SSES ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-11	L1 and JFD P3	CTS 3.6.1.2.d, CTS 3.6.1.2 ACTION d, CTS 3.6.1.2 *footnote, CTS 4.6.1.2.f and ITS SR 3.6.1.3.12 and Associated Bases	CTS 3.6.1.2.d and CTS 4.6.1.2.f specify that the main steam line drains to be leak tested to verify that the leakage is less than 1.2 scfh when tested at 45.0 psig every 18 months. CTS 3.6.1.2 ACTION d specifies the actions to be taken when this leakage is exceeded. CTS 3.6.1.2 *footnote states that this is an exemption to 10 CFR 50 Appendix J. Amendments 151 for Unit 1 and 121 for Unit 2 modified the limits for MSIV leakage but did not change the leakage limits for the drain lines. Amendments 158 for Unit 1 and 129 for Unit 2 changed the frequency to the Primary Containment Leak Rate Testing Program, but did not change the drain line leakage limit. ITS SR 3.6.1.3.12 identifies that the main steam line drain valve leakage is part of the MSIV total allowed leakage of ≤ 100 scfh and requires the combined leakage from the main steam line drains and MSIVs is ≤ 300 scfh. This change increases the allowed leakage through the main steam line drains to be equivalent to the changes	1/21/97		Change is beyond the scope of review for a conversion. Therefore, provide the appropriate ITS ACTIONS, SRs and justifications to account for the addition of this plant specific requirement to the ITS.



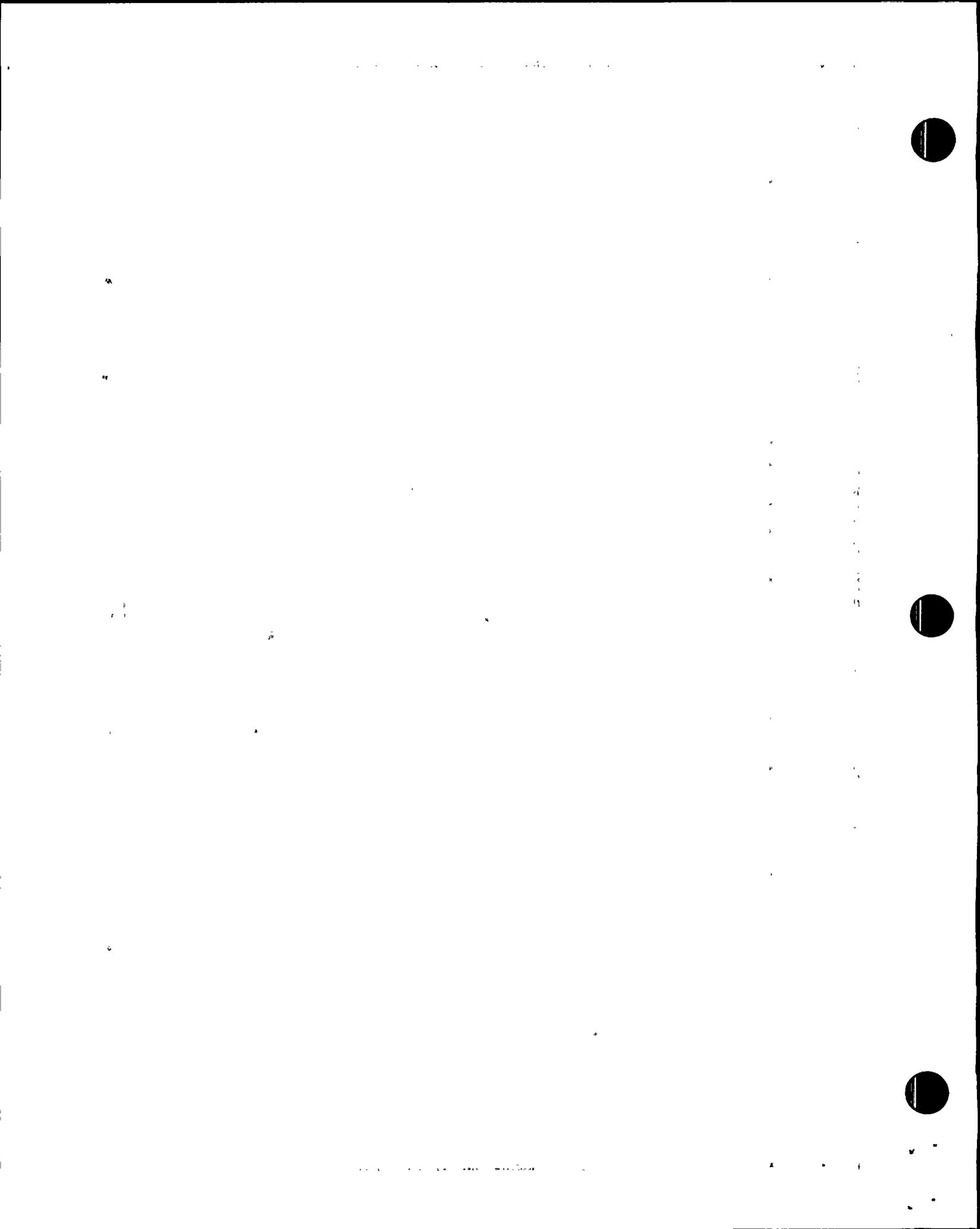
SSES ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
			made in Amendments 151 and 121 for the MSIVs. Since main steam line drain leakage is an exemption to 10 CFR 50, Appendix J, this change is a beyond scope of review for the conversion.			
3.6.1.3.12	L6 and JFD P8	CTS 4.6.3.4 ITS SR 3.6.1.3:9 and Associated Bases	CTS 4.6.3.4 requires testing of the EFCV. ITS SR 3.6.1.3.9 requires the same testing but is modified by a note which allows 6 hours to perform the testing without entering the associated instrument's ACTIONS, provided the associated trip function is maintained. The Bases for the note are Topical Reports NEDC-31677P-A and NEDC-30815P-A. While these topical reports were approved as applicable to RCS and ECCS instrumentation testing, they were not approved for valve testing. Therefore, the change is disapproved. In addition, this change would also be considered as a generic change.	1/21/97		Delete change to ITS.
3.6.1.3-13	JFD P2	ITS 3.6.1.3. and Associated Bases	See Item Number 3.6.1.1-1	1/21/97		See Item Number 3.6.1.1-1



SSES ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-14	JFD P2	ITS SR 3.6.1.3.11	ITS SR 3.6.1.3.11 substitutes 5 scfh and Pa for the bracketed leakage rates and test pressure for secondary containment bypass leakage. The CTS does not show these numbers.	1/21/97		Provide justification for the use of the numbers.
3.6.1.3-15	JFD P4	STS SR 3.6.1.3.1 Bases APPLICABLE SAFETY ANALYSES	STS SR 3.6.1.3.1 requires verification that primary containment purge valves are sealed closed on a 31 day frequency. The APPLICABLE SAFETY ANALYSIS section of the Bases has a paragraph on sealed purged valves. This STS SR and Bases paragraph apply to purge valves that cannot or are unable to close upon receipt of a containment isolation signal. The ITS deletes STS SR 3.6.1.3.1, retains the paragraph on sealed closed valves and makes a modification which refers to ITS SR 3.6.1.3.1 (STS SR 3.6.1.3.2). The CTS states that the valves are not sealed closed and the balance of the ITS Bases states the same.	1/21/97		Delete Applicable Safety Analysis paragraph or reinstate STS SR 3.6.1.3.1. Provide any appropriate justification for the changes.



SSES ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-16	JFD P4	ITS 3.6.1.3 RA E.1, E.2 and E.3 and Associated Bases	STS 3.6.1.3 RA E.1, E.2 and E.3 state the actions to be taken when one or more purge valves are not within leakage limits. The ITS deletes RA E.1, E.2 and E.3 and changes RA E.1 to restore valve to operable status. No justification is provided for this more conservative RA.	1/21/97		Provide an appropriate justification for this more restrictive change.
3.6.1.3-17	JFD P4	ITS Bases SR 3.6.1.3.9	The changes made to ITS Bases SR 3.6.1.3.9 correspond to the changes made to ITS SR 3.6.1.3.9 which are designated P7. P4 deals with editorial and clarification changes not technical changes. Also, see Item Number 3.6.1.3-18	1/21/97		Correct this discrepancy. Also see Item Number 3.6.1.3-18.
3.6.1.3.18	JFD P7	ITS SR 3.6.1.3.9 and associated Bases	ITS SR 3.6.1.3.9 verifies that each reactor instrumentation line EFCV actuates to the isolation position on a simulated instrument line break. CTS 4.6.3.4 verifies that the EFCVs checks flow. The ITS change does not reflect the CTS requirement. Actuating to the isolation position does not necessarily check the flow, there could be some leakage.	1/21/97		Provide adequate justification for the proposed change or confirm to the STS or CTS.



SSES ITS 3.6.1.3 PRIMARY CONTAINMENT ISOLATION VALVES (PCIVs)						
ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.3-19	None	ITS 3.6.1.3 CONDITION A, CONDITION B	ITS 3.6.1.3 CONDITION A and B have bracketed items, no indication is given that the bracketed item should stay or be removed. Bases shows brackets removed.	1/21/97		Remove brackets or provide justification for the deletion of the bracketed items.
3.6.1.3-20	None	ITS CONDITION G	The licensee modified CONDITION G by deleting "or during operations with a potential for draining the reactor vessel (OPDRVs)." Yet RA G.1 which deals with this condition is retained. No justification is provided for this generic change.	1/21/97		Retain the STS wording or provide adequate plant specific justification for this change.



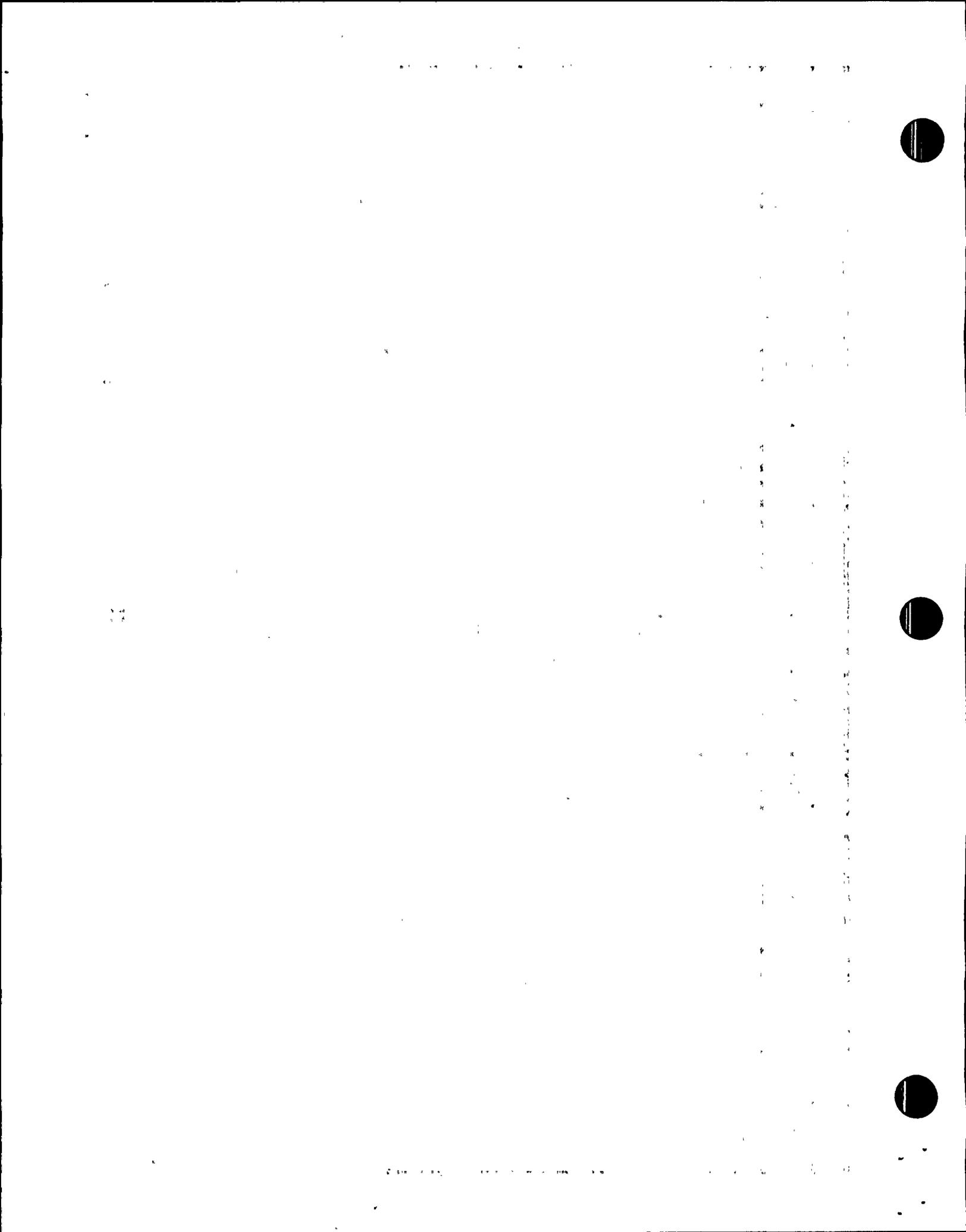
SSES ITS 3.6.1.6 SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.6-1	A3 and JFD P1	CTS ACTIONS ITS 3.6.1.6 CONDITION B and Associated Bases	ITS 3.6.1.6, CONDITION B adds a note that allows separate entry condition for each vacuum breaker. CTS 3.6.4 and STS 3.6.1.8 do not contain this note. The discussions for A3 and P1 do not provide adequate justification for this change. In addition, the staff has determined that this addition is generic, and beyond the scope of review for a conversion.	1/21/97		Delete this generic change.



SSES ITS 3.6.1.6 SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.6-2	LA1	CTS 3.6.4 ACTION C and CTS 4.6.4.b.2 and b.3.b	CTS 3.6.4, ACTION C, requires action for an inoperable vacuum breaker position indicator. CTS 4.6.4.b.2 and b.3.b require determining the OPERABILITY of the vacuum breaker position indicators. ITS 3.6.1.6 does not provide requirements to verify the OPERABILITY of the vacuum breaker position indicator or ACTIONS of a vacuum breaker position indicator is inoperable. The deletion of the ACTIONS and Surveillance Requirements is a less restrictive change and not just a removal of detail. In addition, there is no discussion of how the TRM addresses these requirements and if changes to the TRM are controlled.	1/21/97		Provide discussion and justification for these less restrictive changes deleting CTS requirements. Provide discussions and justifications of how changes to the TRM are controlled.



SSES ITS 3.6.1.6 SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.6-3	L3 and JFD P1	CTS 3.6.4 ACTION b and ITS 3.6.1.6 ACTION C and Associated Bases	CTS 3.6.3, ACTION b, requires verification the other vacuum breaker in a pair is shut within 2 hours if one vacuum breaker is open. No specific action is given if both vacuum breakers are open, therefore, CTS 3.0.3 requires initiation of shutdown within one hour. ITS 3.6.1.6, RA C.1 allows 2 hours to close a vacuum breaker if both vacuum breakers in a pair are open. STS 3.6.1.8 does not address both vacuum breakers being open. This change is a deviation from the STS and a change to the current licensing Bases. Thus the change has been deemed to be generic, and beyond the scope of review for a conversion.	1/21/97		Delete this generic change.



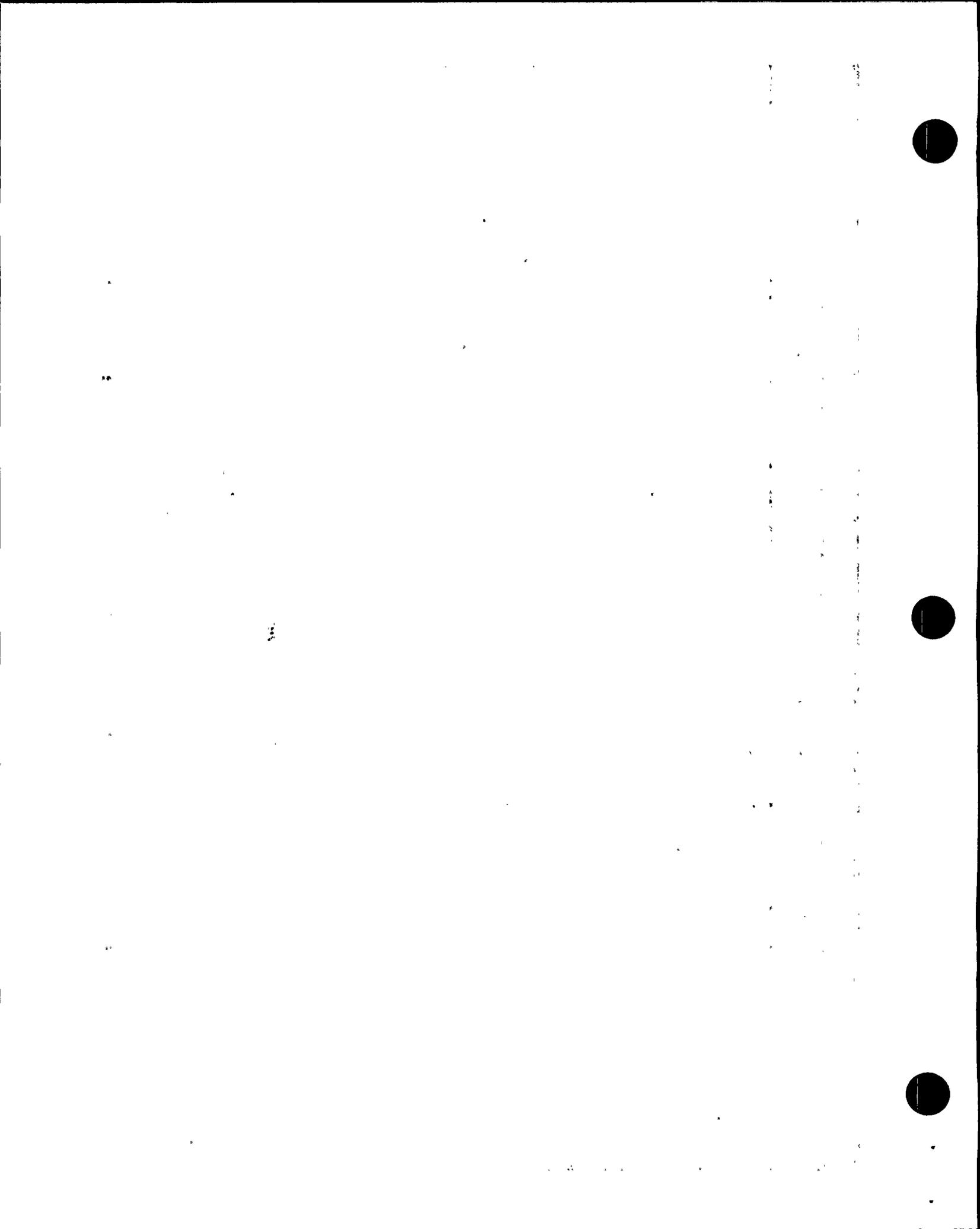
SSES ITS 3.6.1.6 SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.6.4	L4 and JFD P1	CTS 4.6.4.b.3.a and ITS SR 3.6.1.6.3 and Associated Bases	CTS 4.6.4.b.3.a requires verifying that the suppression chamber-to-drywell vacuum breakers setpoint is set at 0.5 psid +/- 5%. ITS SR 3.6.1.6.3 requires verifying that the suppression chamber-to-drywell vacuum breakers setpoint is set at ≥ 0.25 and ≤ 0.75 psid. This change increases the setpoint of the suppression chamber-to-drywell vacuum breakers, and is based on ITS consistency with and conservative to the assumptions in the event analysis which require the vacuum breakers to open. The discussion does not state whether the event analysis is the one used to determine the original setpoint (0.5 psid \pm 5%) or a new analysis. In any event, the staff would need to review the event analysis to verify the new setpoint/tolerances are acceptable. This change would be considered a beyond the scope of review for a conversion.	1/21/97		Delete this change and change ITS SR 3.6.1.6.3 to conform to CTS 4.6.4.b.3.a.

SSES ITS 3.6.1.6 SUPPRESSION CHAMBER-TO-DRYWELL VACUUM BREAKERS						
ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.6-5	JFD P1	CTS 3.6.4 ACTION and ITS 3.6.1.6 CONDITION A and RA A.1	CTS 3.6.4, ACTION a, requires action if one or more vacuum breakers in one pair of vacuum breakers is inoperable for opening. ITS 3.6.1.6, ACTION A, requires action if one vacuum breaker pair is inoperable for opening. The discussing does not provide justification that these requirements are equivalent.	1/21/97		Provide discussion and justification for this change.

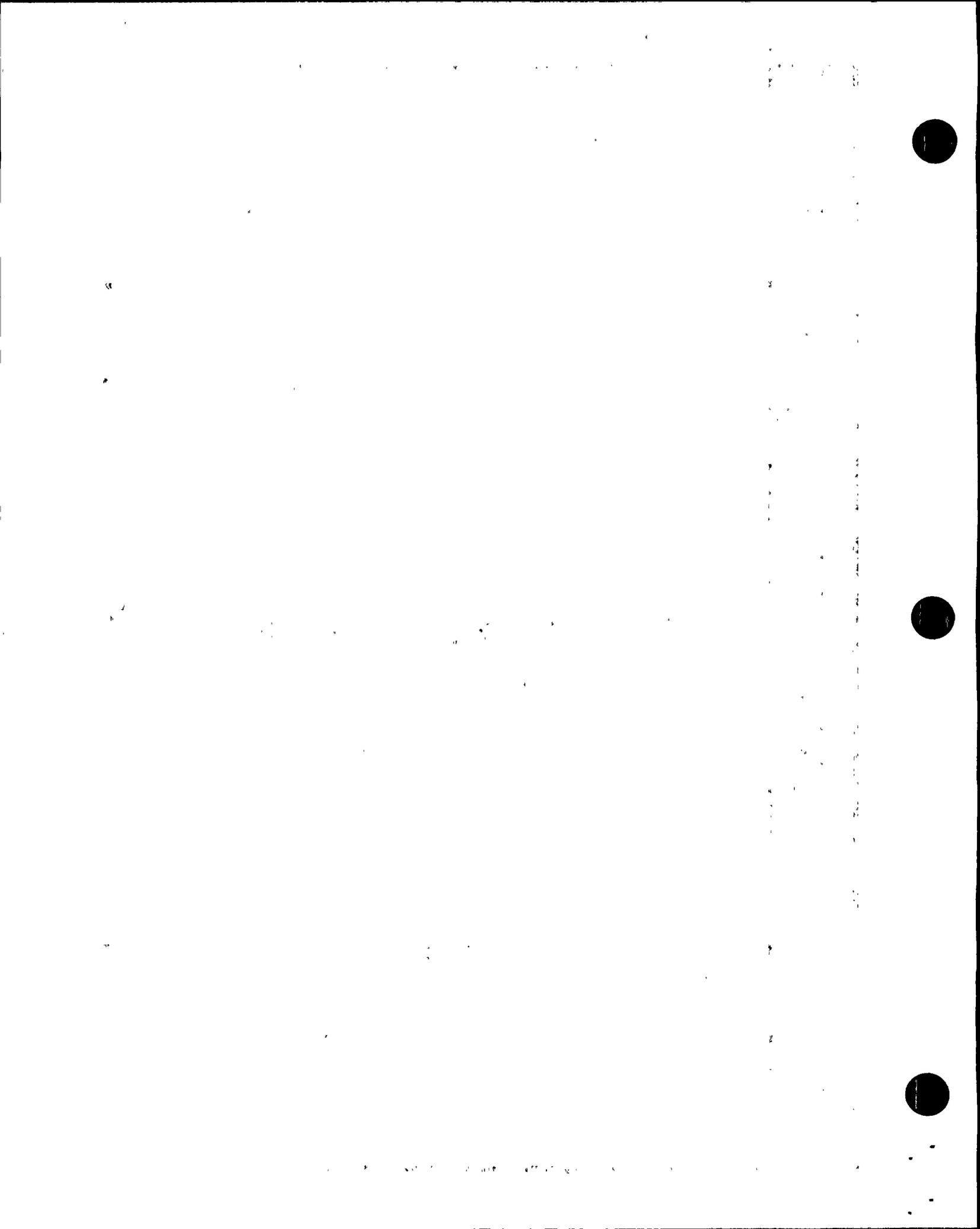
SSES ITS 3.6.1.6 SUPPRESS CHAMBER-TO-DRYWELL VACUUM BREAKERS

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.1.6-6	JFD P2	STS SR 3.6.1.8.1 ITS SR 3.6.1.6.1 and Associated Bases	<p>STS SR 3.6.1.8.1 requires verifying each vacuum breaker is closed within 2 hours after any operation that causes the Drywell-to-Suppression Chamber differential pressure be reduced by $\geq [0,5]$ psid which would cause the vacuum breaker to open. ITS SR 3.6.1.6.1 deletes this requirement.</p> <p>The basis for the deletion is that normal operation will not typically result in suppression chamber to drywell pressure of 0.5 psid and differential pressure is not a parameter normally monitored by SSES operations. This justification if inadequate. If normal operation will not typically result in valve opening, then this would be a generic change which is beyond the scope of review for a conversion. The surveillance does not require monitoring pressure differential, but it requires verification that a valve performing its intended function has reclosed which is the prudent and safe thing to do. Current Licensing Bases (ACTION B) would require this.</p>	1/21/97		Provide additional justification for the STS deviation based on current licensing basis, system design, or operational constraints.



SSES ITS 3.6.2.1 SUPPRESSION POOL AVERAGE TEMPERATURE

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.1-1	A2	3/4.6.2.1 #Footnote	The # Footnote referring to Specification 3.6.3 for ECCS requirements applies to all of CTS 3/46.2.1 not just to the pressure part. Both specifications are applicable in MODES 1 and 2 and CTS 3.6.3 refers through a footnote back to 3/4.6.2.1. However, the footnote is designated as change A2 and is only supposed to apply to ITS 3.6.2.2. This change applies also to ITS 3.6.2.1.	1/21/97		Provide the appropriate justification and designations for this change in ITS 3.6.2.1.
3.6.2.1-2	LA1	CTS 4.6.2.1.c	See Item Number 3.6.2.2-3	1/21/97		See Item Number 3.6.2.2-3
3.6.2.1-3	LA1	CTS 3.6.2.1, ACTIONs c and d CTS 4.6.2.1.c	CTS 3.6.2.1, ACTION c and d, and CTS 4.6.2.1.c establish OPERABILITY requirements, ACTIONS and Surveillance Requirements for the instrumentation used to monitor Suppression Pool level and temperature. The ITS moves these requirements to the Technical Requirements Manual (TRM). No discussion of controls for the TRM is provided.	1/21/97		Provide description of controls for the TRM.

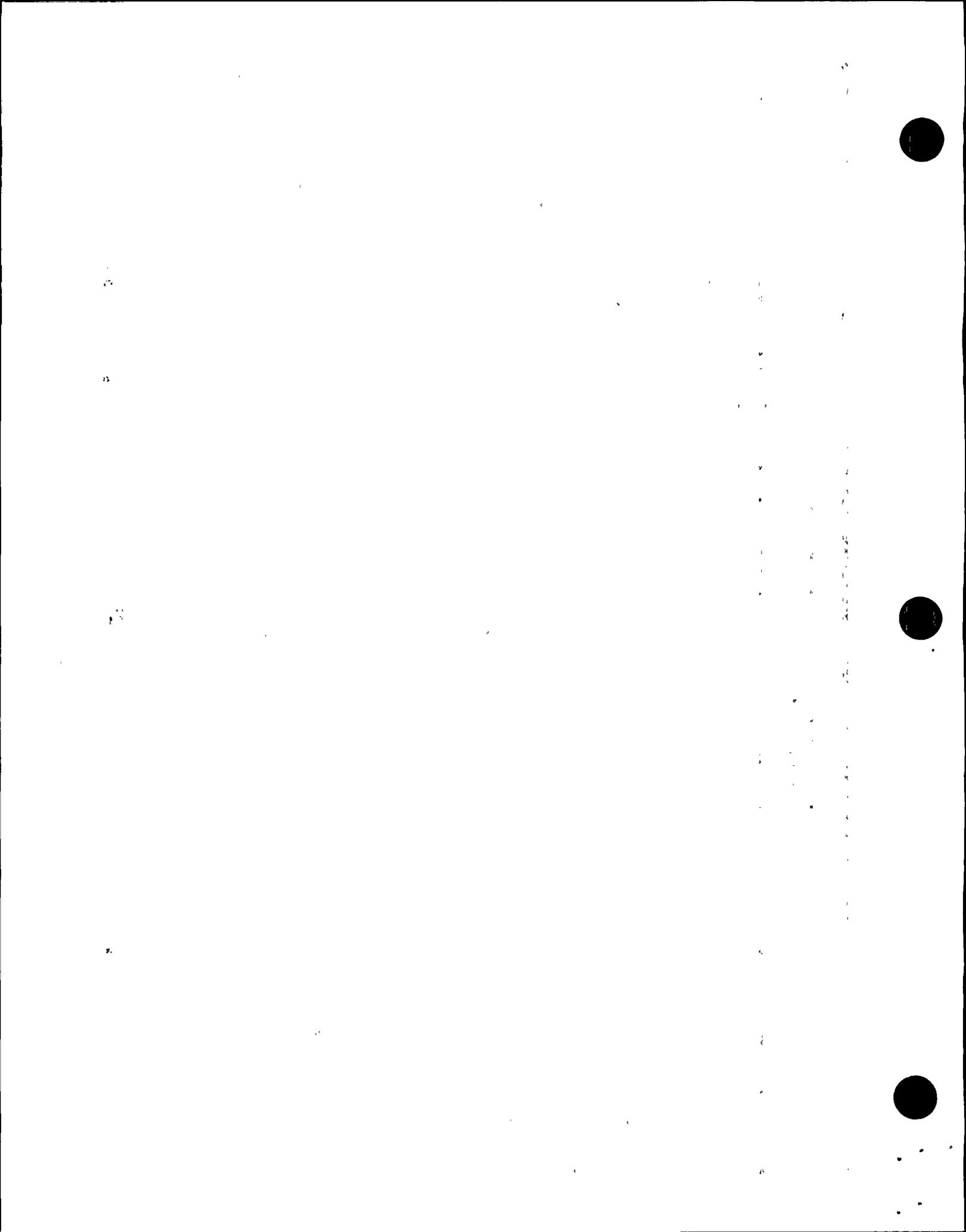


SSES ITS 3.6.2.1 SUPPRESSION POOL AVERAGE TEMPERATURE

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.1-4	LA2	CTS 3.6.2.1, ACTION b.2.b	CTS 3.6.2.1, ACTION b.2.b, requires the Reactor Mode Switch placed in shutdown position and operation of "at least one residual heat removal loop in the suppression pool cooling mode" when Suppression Pool average temperature exceeds 110° F. ITS 3.6.2.1, RA D.1 requires the Mode Switch be placed in shutdown. The suppression pool cooling requirement is moved to plant procedures. The justification does not specify which procedures or control of these procedures.	1/21/97		Provide procedure references and describe procedure controls.
3.6.2.1-5	L1	CTS 4.6.2.1.d	CTS 4.6.2.1.d has a change marked L1. CTS 4.6.2.1.d deals with drywell to suppression chamber bypass leakage which is addressed in ITS 3.6.1.1. ITS 3.6.2.1 L1 does not have anything to do with this change. See Item Number 3.6.1.1-2 and 3.6.2.2-5.	1/21/97		See Item Number 3.6.1.1-2 and 3.6.2.2-5.

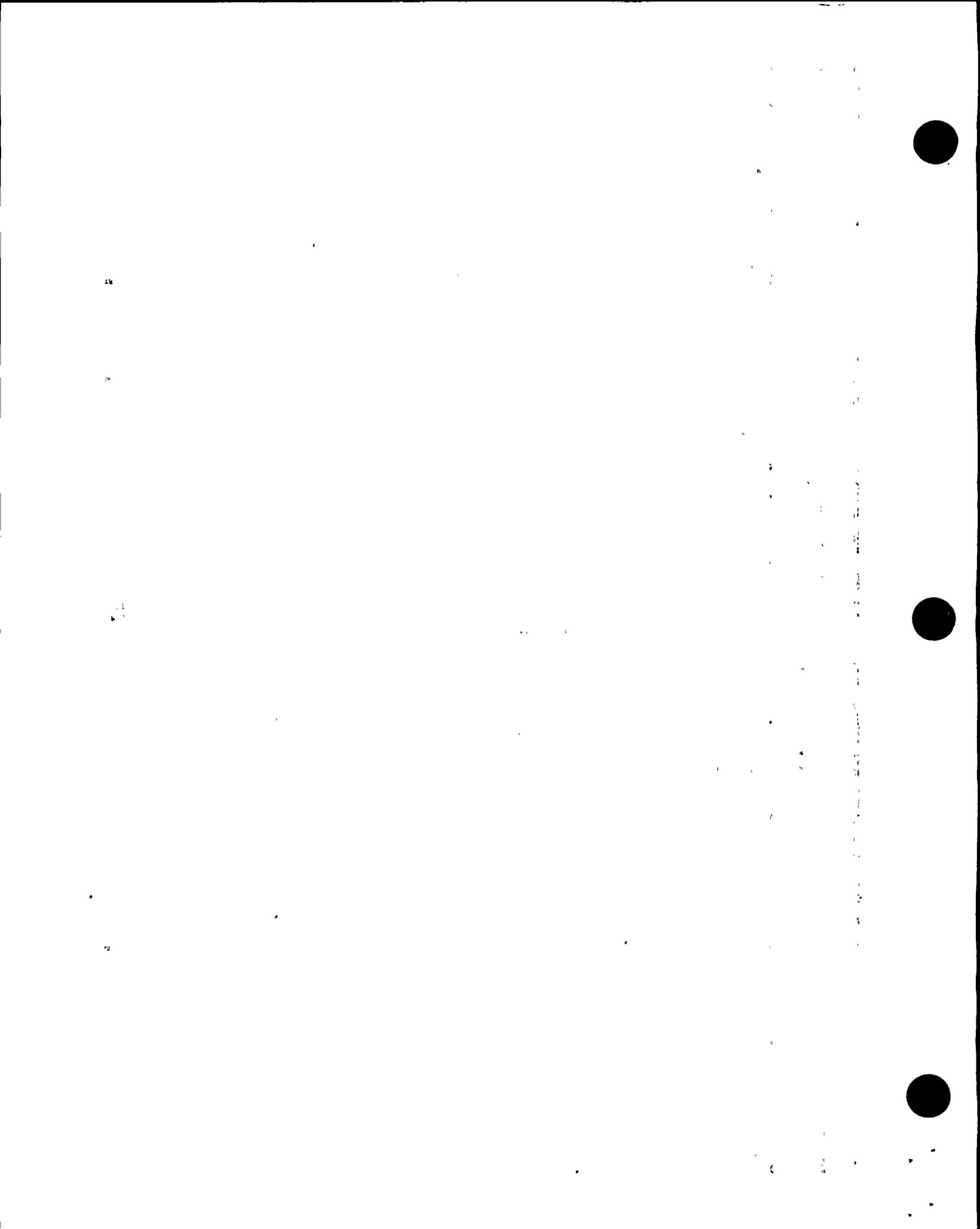
SSES ITS 3.6.2.1 SUPPRESSION POOL AVERAGE TEMPERATURE

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.1-6	JFD P1	ITS LCO 3.6.2.1 and Associated Bases	The LCO states that suppression pool average temperature shall be within stated limits based on the Intermediate Range Monitor (IRM) channel. The Bases adds a statement that other techniques may be used if the IRM is inoperable. The Bases change deviates from the STS Bases and from the LCO requirement. No justification is provided for this change. However, the staff considers this change as generic and beyond the scope of a conversion.	1/21/97		Delete this generic change.



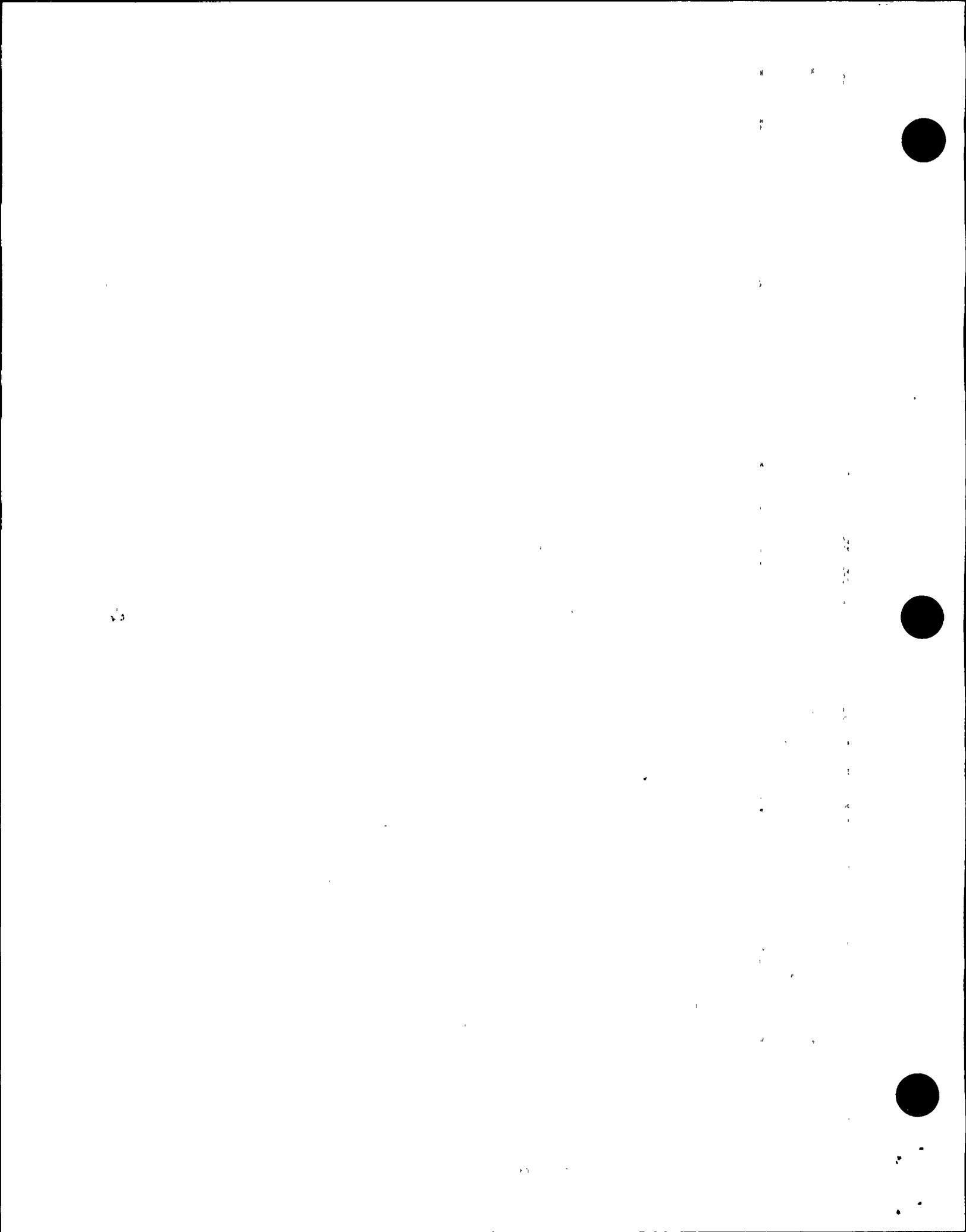
SSES ITS 3.6.2.2 SUPPRESSION POOL WATER LEVEL

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.2-1	A2	3/4.6.2.1 #Footnote	See Item Number 3.6.2.1-1	1/21/97		See Item Number 3.6.2.1-1
3.6.2.2-2	M2	CTS 4.5.3.1.a.2	Because of the interrelationship between CTS 3.5.3 and CTS 3.6.2.1 as a result of the #Footnote in both specifications (See item numbers 3.6.2.1-1 and 3.6.2.2-1), CTS 4.5.3.1.a applies for both specifications because of the water level requirement of 22' 0". Thus any changes to CTS 4.5.3.1.a.2 must be described also in this section. Therefore, either CTS 4.5.3.1a.2 must be incorporated in ITS 3.6.2.2, incorporated but modified, or deleted. In any event, the M2 designation and change which now only applies to ITS 3.5.2 may apply to ITS 3.6.2.2 or may change to a less restrictive requirements.	1/21/97		Provide a discussion and justification for incorporation modification or deletion of CTS 4.5.3.1.a.2 into ITS 3.6.2.2.



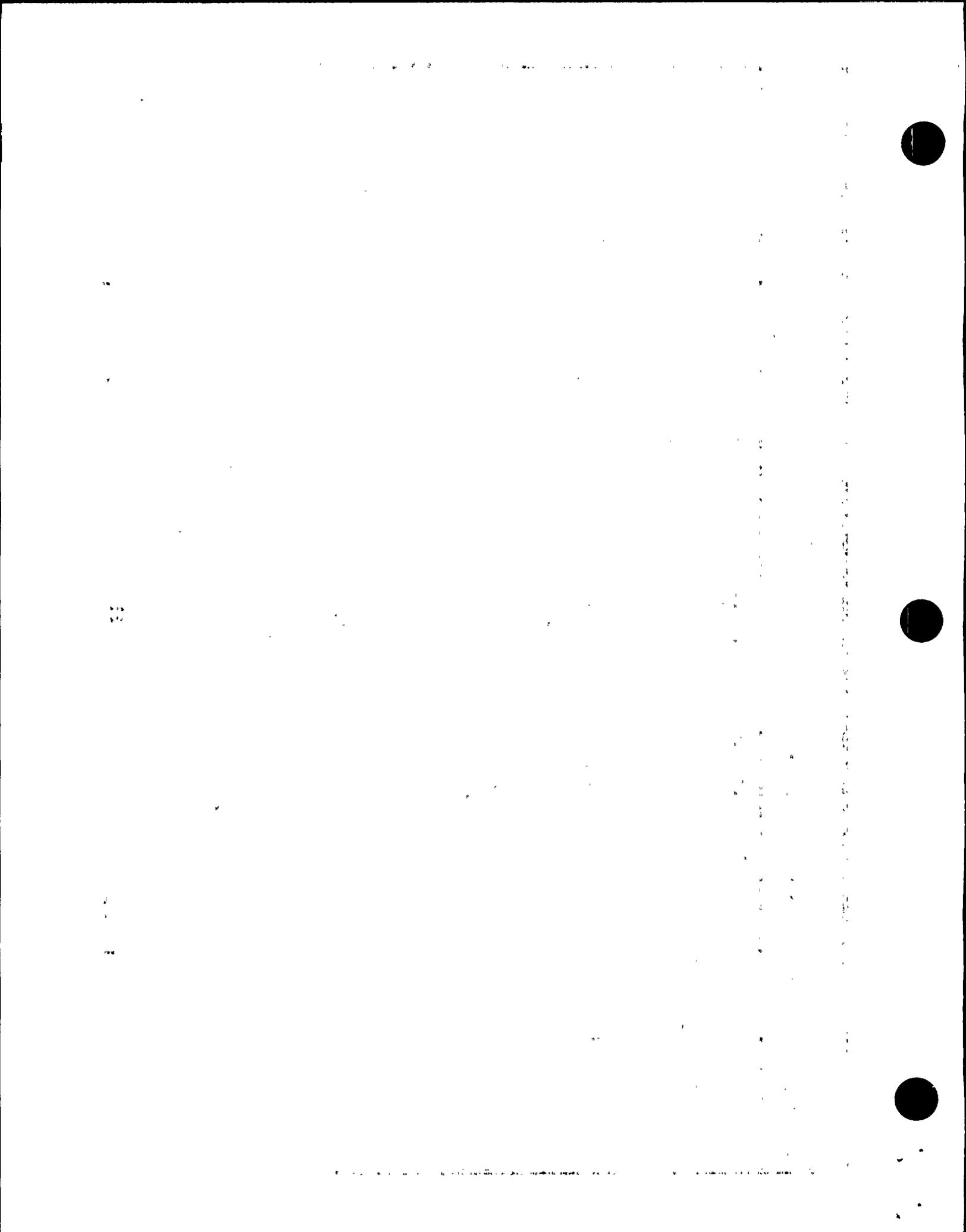
SSES ITS 3.6.2.2 SUPPRESSION POOL WATER LEVEL

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.2-3	LA1	CTS 4.6.2.1.c	CTS 4.6.2.1.c provides surveillance requirements for the suppression chamber water temperature indicators as well as the water level indicators. The specification is being relocated to the TRM and the change is designated as LA1. However, the discussion and justification provide for LA1 in ITS 3.6.2.2 differs from LA1 in ITS 3.6.2.1, particularly in the reference to CTS 4.5.6.2.1.c. The discussions and justifications in both section should be the same.	1/21/97		Provide any additional discussion and justification necessary to make LA1 in both sections consistent.
3.6.2.2-4	LA1	CTS 3.6.2.1, ACTIONS c and d CTS 4.6.2.1.c	See Item Number 3.6.2.1-3	1/21/97		See Item Number 3.6.2.1-3
3.6.2.2-5	L1	CTS 4.6.2.1.d	See Item Numbers 3.6.1.1-2 and 3.6.2.1-5	1/21/97		See Item Numbers 3.6.1.1-2 and 3.6.2.1-5



SSES ITS 3.6.2.3 RESIDUAL HEAT REMOVAL SUPPRESSION POOL COOLING						
ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.3-1	A5	CTS 4.6.2.3.b	CTS 4.6.2.3.b requires verifying each of the required RHR pumps develops a flow of 10,000 +0, -250 gpm on recirculation flow through the RHR heat exchanger and the Suppression Pool. ITS SR 3.6.2.3.2 requires this verification be performed at a flow rate greater than 9750 gpm. This is a less restrictive change in that the upper tolerance (10,000 +0) is deleted.	1/21/97		Provide discussion and justification for the less restrictive change.

SSES ITS 3.6.2.3 RESIDUAL HEAT REMOVAL SUPPRESSION POOL COOLING						
ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.3-2	L2 and JFD P1	CTS 3.6.2.3, ACTION b ITS 3.6.2.3 RA B.1 and Associates Bases STS 3.6.2.3 ACTION B	CTS 3.6.2.3, ACTION b, requires that the reactor be in MODE 3 within 12 hours and MODE 4 within 36 hours if both suppression pool cooling loops are inoperable. Under the same conditions, ITS 3.6.2.3, RA B.1, allows 8 hours to attempt to restore at least one inoperable suppression pool cooling subsystem to OPERABLE status before a plant shutdown must be initiated. STS 3.6.2.3 ACTION B requires an immediate shutdown on loss of cooling function. The justification for this change is consistency with other STS specifications. This is an inadequate justification for this change. In addition, the staff has determined that this change is generic and beyond the scope of review for this conversion.	1/21/97		Delete this generic change.



SSES ITS 3.6.2.4 RESIDUAL HEAT REMOVAL SUPPRESSION POOL SPRAY						
ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.4-1	A5	CTS 4.6.2.2.b	See Item Number 3.6.2.3-1	1/21/97		See Item Number 3.6.2.3-1
3.6.2.4-2	A5 and JFD P1	CTS 4.6.2.2.b, ITS SR 3.6.2.4.2 STS SR 3.6.2.4.2 and Associated Bases	CTS 4.6.2.2.b requires the pump test be performed per CTS 4.6.2.3.b which has the system recirculating the flow through the RHR heat exchanger and the suppression pool (STS/ITS-suppression pool cooling mode). STS SR 3.6.2.4.2 requires the pump test be done in the suppression pool spray mode. Insufficient information is provided in the justification or ITS Bases for ITS 3.6.2.4 to determine why this test cannot be performed in the spray mode of operation in accordance with the STS frequency. Also see Item Number 3.6.2.4-3.	1/21/97		Provide additional discussion and justification to show why STS SR 3.6.2.4.2 should not be performed.
3.6.2.4-3	L3 and JFD P1	CTS 4.6.2.2c ITS SR 3.6.2.4.2 and Associated Bases. STS SR 3.6.2.4.2	CTS 4.6.2.2.c requires a flow test through the spray header and nozzles to verify an unobstructed flow path on a 5 year frequency. The STS verified this requirement by performing STS SR 3.6.2.4.2. See Item Number 3.6.2.4-2.	1/21/97		See Item Number 3.6.2.4-2



SSES ITS 3.6.2.4 RESIDUAL HEAT REMOVAL SUPPRESSION POOL SPRAY

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.4-4	L3 and JFD P1	CTS 4.6.2.2.c ITS SR 3.6.2.4.2 and Associated Bases	CTS 4.6.2.2.c requires verification every 5 years that each Suppression Pool Spray nozzle is unobstructed. ITS SR 3.6.2.4.2 requires the verification every 10 years that each Suppression Pool Spray nozzle is unobstructed. L3 justifies this change on the passive design of the nozzle system. This is insufficient justification to allow the frequency to change from 5 years to 10 years.	1/21/97		Provide additional justification for this less restrictive frequency based on operational data, nozzle design, or operational constraints.



SSES ITS 3.6.2.4 RESIDUAL HEAT REMOVAL SUPPRESSION POOL SPRAY

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.2.4-5	None (JFD P1)	ITS B.3.6.2.4 Bases RA B.1 STS B.3.6.2.4 Bases RA B.1	The Bases for STS B.3.6.2.4 RA B.1 states that the Completion Time of 8 hours to restore one RHR Suppression Pool Subsystem is acceptable "due to the low probability of a DBA" and because alternative methods to remove heat from primary containment are available." The Bases for ITS B.3.6.2.4 RA B.1 deletes the Bases justification "and because...are available." No justification or designation is provided for this deletion. Normally a total loss of function would by TS require an immediate shutdown or entry into STS/ITS LCO 3.0.3. A low probability of a DBA is not a valid justification to extend the restoration time to OPERABLE status from 0 to 1 hour (LCO 3.03); additional conditions, or system designs are necessary to extend the AOT. In this case, it is, by the STS discussion, the availability of alternative methods of primary containment heat removal.	1/21/97		Either return the sentence to the original STS wording or provide discussion and justification for the STS deviation based on current licensing basis, system design, or operational constraints and correct the Bases accordingly, or delete the entire ACTION B.

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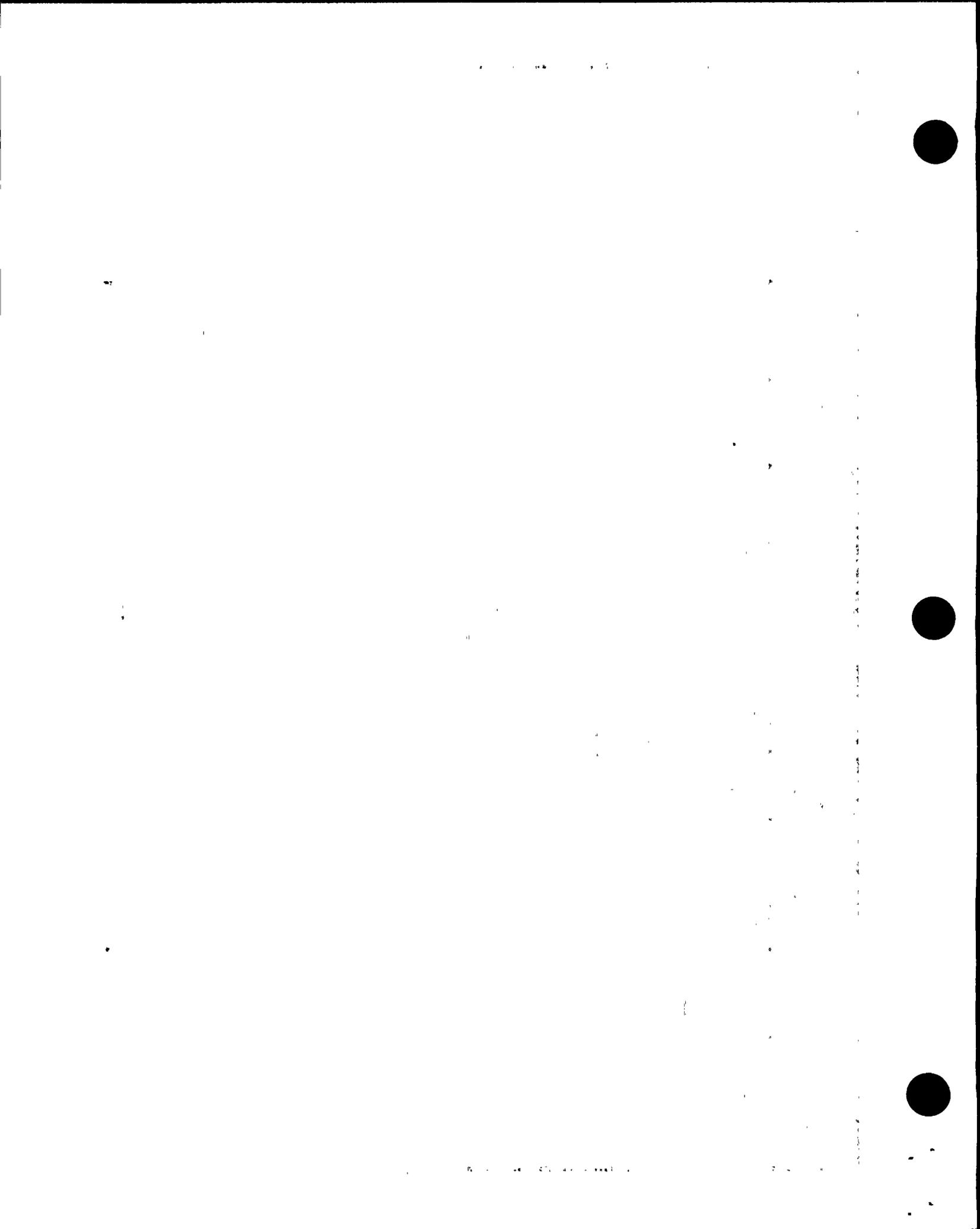
CONFIDENTIAL - SECURITY INFORMATION

SSES ITS 3.6.3.1 PRIMARY CONTAINMENT HYDROGEN RECOMBINERS

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.3.1-1	LA1	CTS 4.6.6.1.b.1	CTS 4.6.6.1.b.1, requires hydrogen recombiner OPERABLE and specifically requires the performance of CHANNEL CALIBRATION of all recombiner operating instrumentation and control circuits. The ITS moves this requirement to the TRM. No discussion of controls for the TRM is provided.	1/21/97		Provide description of controls for the TRM.
3.6.3.1-2	LA3	CTS 4.6.6.1.b.3	CTS 4.6.6.1.b.3 requires the performance of a visual examination and details what to examine during a visual examination. ITS SR 3.6.3.1.2 requires a visual examination be performed, but moves the details to plant procedures. The justification does not specify which procedures or control of these procedures.	1/21/97		Provide procedure references and describe procedure controls.

SSES ITS 3.6.3.1 PRIMARY CONTAINMENT HYDROGEN RECOMBINERS

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.3.1-3	LA4 and JFD P1	CTS 3.6.6.1 ITS LCO 3.6.3.1 ITS 3.6.3.1 RA A.1 and RA B.2 ITS SR 3.6.3.1.1 ITS SR 3.6.3.1.2 and Associated Bases	CTS 3.6.6.1 contains details defining the primary containment hydrogen recombiner system. The justification provided describes removal of these details to the Bases. These details remain in ITS 3.6.3.1, so the DOC file describes a CTS change which was not made. In addition, the terms "Primary Containment" and "Drywell and Suppression Chamber" are used interchangeably throughout the specification without thought to the actual system design. See Item Number 3.6.3.1-4.	1/21/97		Provide additional justification, discussion, and changes to address the actual intent of the change. Also see Item Number 3.6.3.1-4.



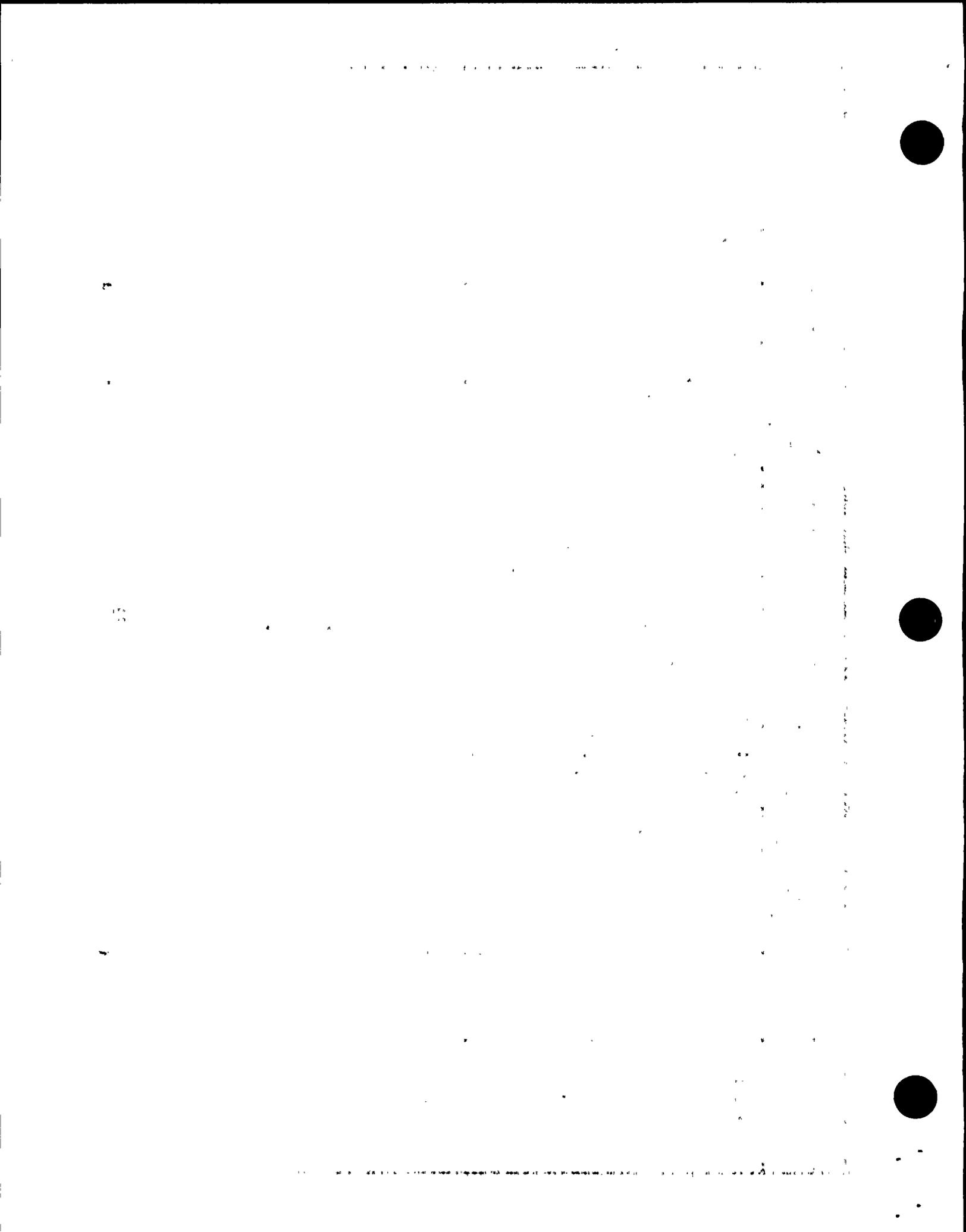
SSES ITS 3.6.3.1 PRIMARY CONTAINMENT HYDROGEN RECOMBINERS

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.3.1-4	JFD P1	ITS 3.6.3.1 ACTION A and ACTION B and Associated Bases.	ITS 3.6.3.1 Conditions A and B have been modified from STS 3.6.3.1 Conditions A and B to reflect the design of the Hydrogen Recombiner System. Based on a review of the Hydrogen Recombiner System in the ITS Bases, the proposed modifications do not reflect the intent of STS 3.6.3.1 ACTIONS A and B. For example, successful completion of STS 3.6.3.1 RA B.1 and B.2 within the stated Completion Times would result in exiting STS 3.6.3.1 Condition B and reentering Condition A. However, successful completion of ITS 3.6.3.1 RA B.1 and B.2 within the stated Completion Times will not necessarily result in an exiting of ITS 3.6.3.1 Condition B. See Item Number 3.6.3.1-3.	1/21/97		Licensee to reevaluate proposed changes and modify to accurately reflect system design. Provide additional justification and discussion on the changes made. Also see Item Number 3.6.3.1-3



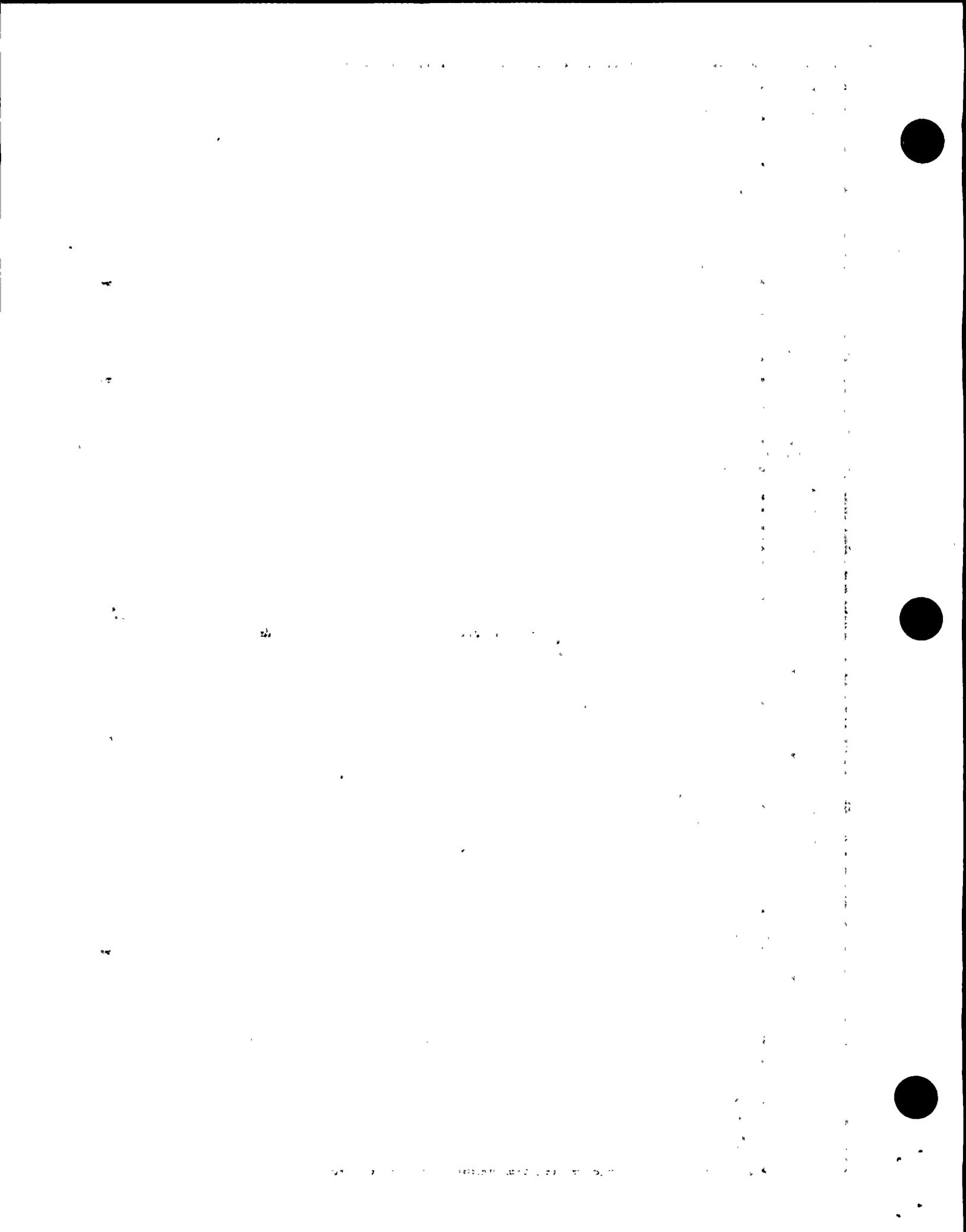
SSES ITS 3.6.4.1 SECONDARY CONTAINMENT

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.1-1	LA4	CTS 4.6.5.1.c	CTS 4.6.5.1.c establishes requirements for verifying secondary containment by establishing limits on the maximum time allowed to draw down and the maximum flow rate allowed to maintain secondary containment for several different secondary containment configurations. ITS 3.6.4.1 moves the limits for maximum draw down time and maximum flow rates to maintain vacuum to the TRM. No discussion of controls for the TRM is provided. See Item Number 3.6.4.1-2.	1/21/97		Provide description of controls for the TRM.



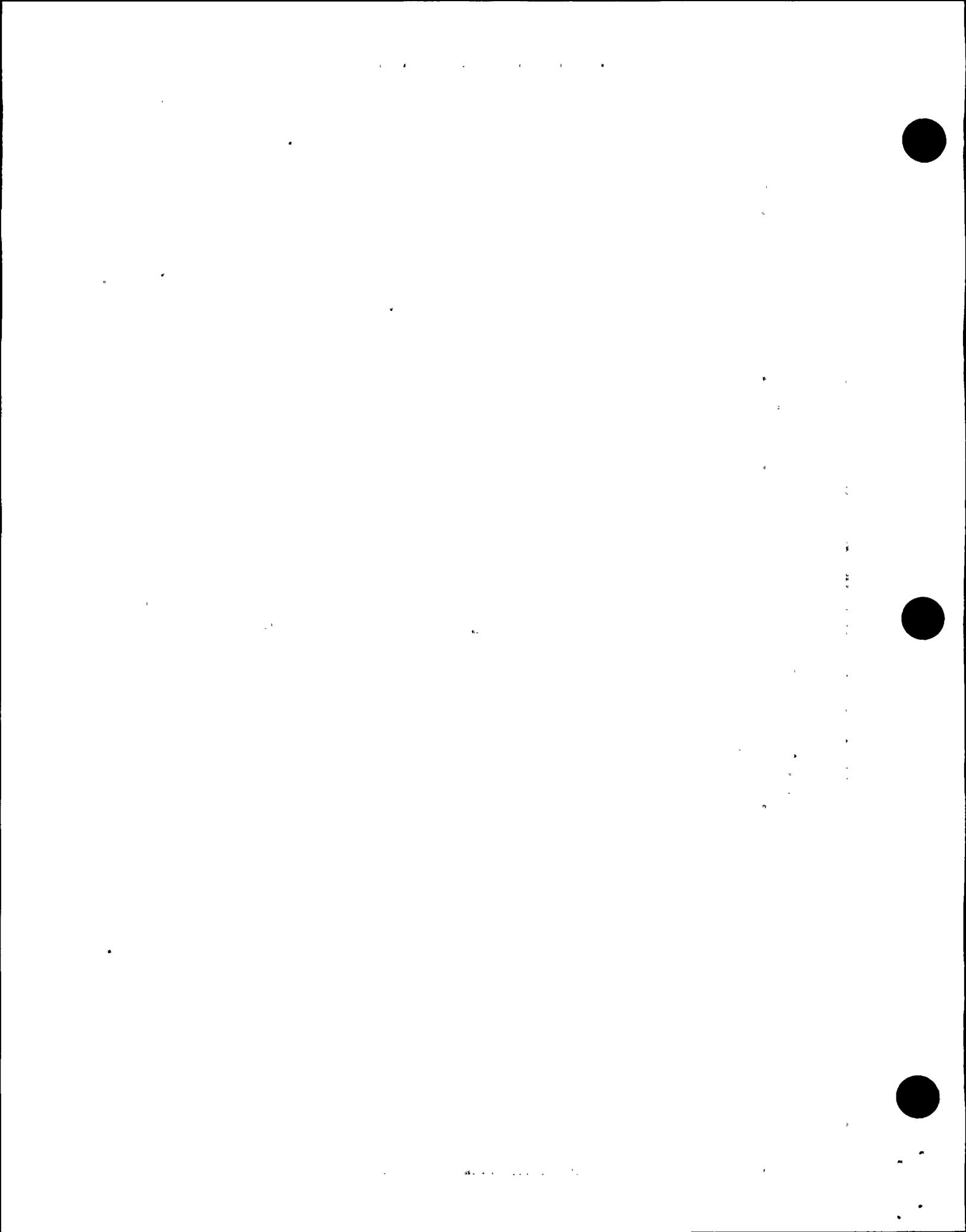
SSES ITS 3.6.4.1 SECONDARY CONTAINMENT

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.1-2	LA4 and JFD P2	CTS 4.6.5.1.c ITS SR 3.6.4.1.4 ITS SR 3.6.4.1.5 and Associated Bases STS SR 3.6.4.1.4 STS SR 3.6.4.1.5	CTS 4.5.1.c establishes requirements for verifying secondary containment by establishing limits on the maximum time allowed to draw down and the maximum flow rate allowed to maintain secondary for several different containment configurations. ITS SR 3.6.4.1.4 and SR 3.6.4.1.5 require the same demonstrations of secondary containment operability, but moves the limits for maximum draw down time and maximum flow rates to maintain vacuum to the TRM. STS SR 3.6.4.1.4 and SR 3.6.4.1.5 specify these limits in the SR. Because of the secondary containment design configuration specifying these operability parameters in the ITS SRs would not conform readily to the STS format. However, since these parameters are operability parameters, the STS format would require these parameters to be specified in the Bases discussion for the SR. This would be consistent with other operability parameters in which the STS/ITS SR states "within limits" and the	1/21/97		Revise the Bases descriptions for ITS SR 3.6.4.1.4 and SR 3.6.4.1.5 to specify the parameters with their associated secondary containment design configuration. Provide additional justification and discussion to support this change.



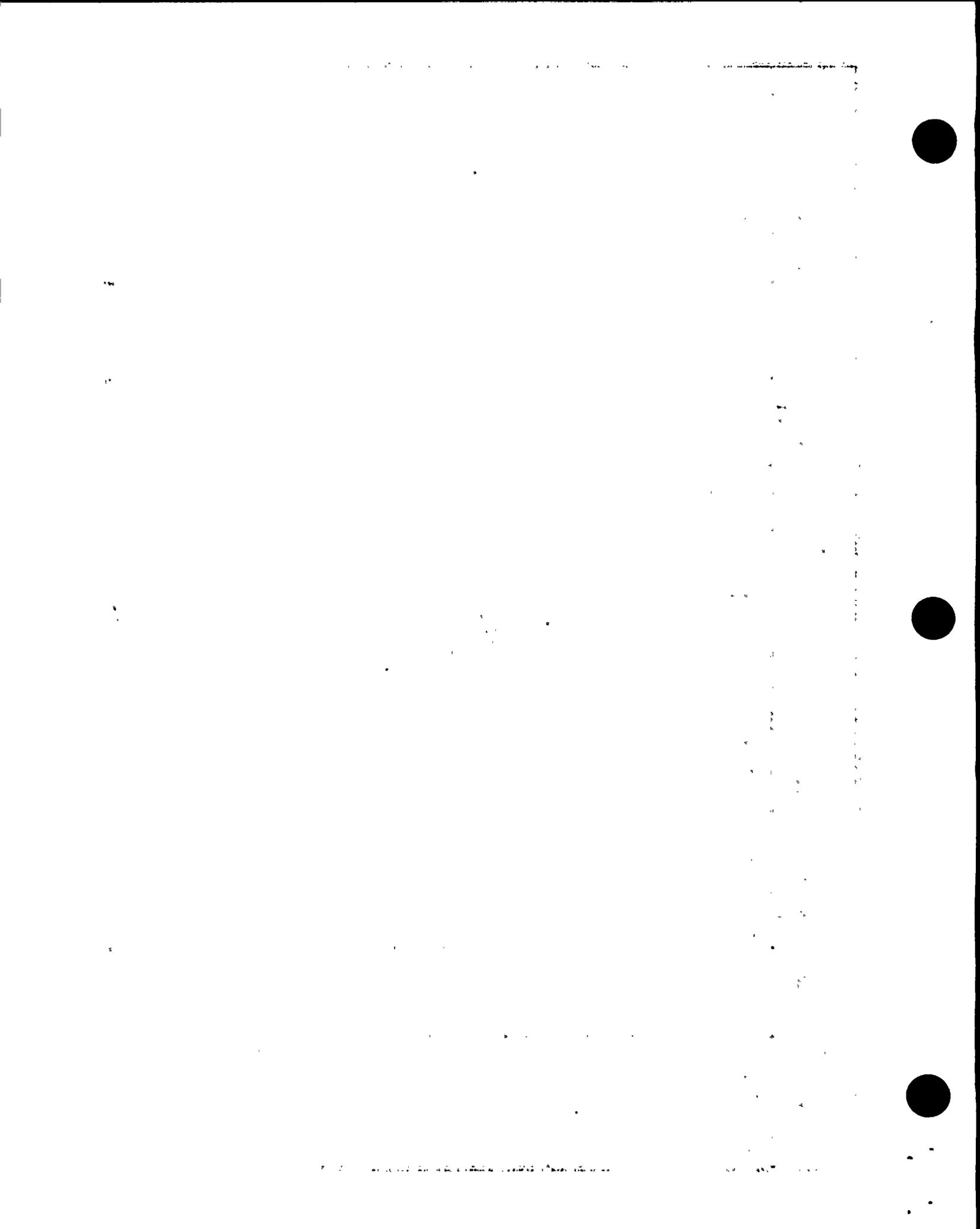
SSES ITS 3.6.4.1 SECONDARY CONTAINMENT

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.1-3	JFD P2	ITS B3.6.4.1 Bases for SR 3.6.4.1.2 and SR 3.6.4.1.3.	ITS B3.6.4.1 Bases for SR 3.6.4.1.2 and SR 3.6.4.1.3 makes modifications to the STS wording to conform the description to the BWR Mark II containment configuration. Two of the changes are the addition of "in each access opening" to the first sentence and the deletion of "normal transient" from the sentence beginning with "Maintaining secondary containment OPERABILITY..." These two changes were part of TSTF 18 which was rejected by the staff.	1/21/97		Provide additional justification and discussion to show that these two TSTF 18 changes are applicable based on current licensing Basis, system design or operational constraints.
3.6.4.2-1	None	CTS Page 3/4.3-32 CTS Page 3/4.6.32	ITS 3.6.4.2 has CTS page 3/4.3-32 as the first marked up page in this section. CTS page 3/4.3-32 deals with ECCS actuation instrumentation setpoints which has nothing to do with secondary containment isolation valves. The correct page should be CTS page 3/4.6.32.	1/21/97		Correct this discrepancy.



SSES ITS 3.6.4.2 SECONDARY CONTAINMENT ISOLATION VALVES (SCIVs)

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.2-2	A6	CTS 4.6.5.2.c	CTS 4.6.5.2.c requires the verifying of the SCIVs isolation time is within limits on a 92 day frequency. The "once per 92 day" frequency is designated as administrative change "A6". A6 discusses and justifies the distinction between SCIVs and "required" SCIVs, and has nothing to do with the isolation time frequency of 92 days.	1/21/97		Provide justification and discussion for this administrative change to CTS 4.6.5.2.c.
3.6.4.2-3	M? and JFD P1	CTS 3.6.5.2 ACTIONS ITS 3.6.4.2 Condition A Note ITS 3.6.4.2 RA A.2.	CTS 3.6.5.2 ACTIONS specify the remedial actions to be taken for any inoperable SCIV. ITS 3.6.4.2 Condition A has a note which restricts the remedial actions for ACTION A to only those penetration flow paths with two SCIVs. ITS 3.6.4.2 RA.2 verifies the affected flow path is isolated on a 31 day frequency. These changes are not indicated in the CTS markup and are more restrictive. Also see Item Number 3.6.4.2-6.	1/21/97		Provide justification and discussion for this more restrictive change. See Item Number 3.6.4.2-6.



SSES ITS 3.6.4.2 SECONDARY CONTAINMENT ISOLATION VALVES (SCIVs)

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.2-4	M?	CTS 3.6.5.2 ACTIONS ITS 3.6.4.2 ACTION B	CTS 3.6.5.2 ACTIONS specify the remedial actions to be taken for any inoperable SCIV. ITS 3.6.4.2 ACTION B is added to cover penetrations with two inoperable SCIVs in the flow path and has RAs and Completion Times that are different from CTS 3.6.5.2 ACTIONS. This change is not indicated in the CTS markup and is more restrictive.	1/21/97		Provide justification and discussion for this more restrictive change.
3.6.4.2-5	M? and JFD P1	CTS 3.6.5.2 ACTIONS ITS 3.6.4.2 ACTION C	CTS 3.6.5.2 ACTIONS specify the remedial actions to be taken for any inoperable SCIV. ITS 3.6.4.2 ACTION C is added to cover those penetration flow paths with one SCIV, and has RAs and completion times that are different from CTS 3.6.5.2 ACTIONS. This change is not indicated in the CTS markup and is more restrictive. Also, see Item Number 3.6.4.2-6.	1/21/97		Provide justification and discussion for this more restrictive change. See Item Number 3.6.4.2-6.



SSES ITS 3.6.4.2 SECONDARY CONTAINMENT ISOLATION VALVES (SCIVs)

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.2-6	JFD P1	STS 3.6.4.2 ACTION A ITS 3.6.4.2 Condition A Note ITS 3.6.4.2 ACTION C and Associated Bases	STS 3.6.4.2 ACTION A provides the remedial measures to be taken for penetration flow paths with one SCIV inoperable, irregardless of whether flow path has one or two SCIVs. The Completion Time given for RA A.1 reflects the relative importance/safety significance of secondary containment as compared to primary containment. ITS 3.6.4.2 modifies STS 3.6.4.2 ACTION A to restrict it to penetration flow paths with two SCIVs and adds ACTION C for those flow paths with one SCIV. This is done for consistency with STS/ITS 3.6.1.3 primary containment isolation valves. Insufficient information is provided in the discussion and justification (P1) to determine that this SCIV design has unique characteristics which would necessitate these changes. Based on the information provided the staff's determination of the changes is that it is a generic change applicable to all BWRs and would be beyond the scope of review for this conversion.	1/21/97		Provide additional justification and discussion to show that these changes are applicable based on current licensing basis, system design or operational constraints, or delete this potential generic change.

SSES ITS 3.6.4.2 SECONDARY CONTAINMENT ISOLATION VALVES (SCIVs)

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.2-7	JFD P2	STS B3.6.4.2 Bases-LCO ITS B3.6.4.2 Bases-LCO	STS B3.6.4.2 Bases for the LCO describes when normally closed valves should be considered OPERABLE. The description states that for normally closed automatic SCIVs to be considered OPERABLE they must be in their closed position and de-activated and secured. The intent of the STS wording is that the valve is in its isolation position and will not inadvertently, or automatically change its position. ITS B3.6.4.2 Bases for the LCO deletes the words "de-activated and secured." The deletion of these words radically changes the definition of OPERABLE normally closed automatic isolation valves. This change is unacceptable.	1/21/97		Return the Bases wording to the STS wording.



SSES ITS 3.6.4.2 SECONDARY CONTAINMENT ISOLATION VALVES (SCIVs)

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.2-8	JFD P2	ITS B3.6.4.2 Bases SR 3.6.4.2.2	ITS SR 3.6.4.2.2 verifies the isolation times of the SCIVs. The Bases description for ITS SR 3.6.4.2.2 states that "The isolation times for required SCIVs are located in the Technical Requirements Manual (Ref 4)." CTS Table 3.6.5.2-1 which contains the isolation times for the automatic SCIVs has been relocated per LA1 to the Bases as ITS Table B3.6.4.2-1. No mention is made in LA1 that the table is also relocated to the TRM. Also, ITS B3.6.4.2 references do not include Reference 4 TRM.	1/21/97		Correct the Bases description for ITS SR 3.6.4.2.2 to refer to ITS Table B3.6.4.2.1 rather than the TRM.



SSES ITS 3.6.4.3 STANDRY GAS TREATMENT SYSTEM

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.3-1	A2	CTS 4.6.5.3.d.2 ITS SR 3.6.4.3.3	CTS 4.6.5.3.d.2 requires that the SGT filter train starts and associated dampers open on both a manual initiation from the control room and a simulated automatic initiation signal. ITS SR 3.6.4.3.3 only requires starting by an actual or simulated automatic initiation signal. The deletion of the system start requirement by manual initiation from the control room has not been justified and is a less restrictive change. Also, see Item Number 3.6.4.3-2.	1/21/97		Provide justification and discussion for this less restrictive change. See Item Number 3.6.4.3-2.
3.6.4.3-2	None	CTS 4.6.5.3.b CTS 4.6.5.3.c CTS 4.6.5.3.d.1 CTS 4.6.5.3.d.2.a CTS 4.6.5.3.d.2.b CTS 4.6.5.3.d.4 CTS 4.6.5.3.e CTS 4.6.5.3.f	CTS 4.6.5.3.b, 4.6.5.3.c, 4.6.5.3.d.1, 4.6.5.3.d.4, 4.6.5.3.e, and 4.6.5.3.f have all been relocated to ITS 5.5.7. CTS 4.6.5.3.d.2.a and 4.6.5.3.d.2.b have been relocated to ITS SR 3.3.6.2.3. No justification or discussion is provided for these administrative changes.	1/21/97		Provide justification and discussion for these administrative changes.



SSES ITS 3.6.4.3 STANDRY GAS TREATMENT SYSTEM

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.3-3	LA2	CTS 4.6.5.3.a	CTS 4.6.5.3.a includes test methodology details associated with the testing of the SGT System. The ITS moves these details to plant procedures. Procedure references and associated controls are not provided.	1/21/97		Provide additional discussion and justification pertaining to the procedures and associated controls.
3.6.4.3-4	LB1	CTS 4.6.5.3.d.3 ITS 3.6.4.3.4	CTS 4.6.5.3.d.3 establishes 18 months as the required frequency to verify the filter cooling bypass and outside air dampers open and the fan starts on filter cooling initiation. ITS SR 3.6.4.3.4 performs the same test but the required frequency is extended to 24 months. LB1 refers to CTS 4.6.5.3.d.3 but incorrectly cites ITS SR 3.6.4.3.3. The 18 to 24 month frequency change is a beyond scope of review for this conversion.	1/21/97		Correct the discrepancy. Since the change is a beyond scope of review for conversion, it has been assigned to the appropriate staff Technical Branch for review. Inclusion of this change in the conversion will depend on the results of that review.



SSES ITS 3.6.4.3 STANDRY GAS TREATMENT SYSTEM

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.3-5	LB1	CTS 4.6.5.3.d.2 ITS SR 3.6.4.3.3	CTS 4.6.5.3.d.2 establishes 18 months as the required frequency to verify that the filter train starts and associated dampers open on manual initiation and simulated automatic initiation signals. ITS SR 3.6.4.3.3 performs virtually the same test but the required frequency is extended to 24 months. No justification has been provided for this less restrictive change. LB1 in the CTS markup refers to this change but it references CTS 4.6.5.3.d.3 not CTS 4.6.5.3.d.2. The 18 to 24 month frequency change is a beyond scope of review for this conversion.	1/21/97		Provide justification and discussion for this less restrictive change. Since the change is a beyond scope of review for the conversion, it has been assigned to the appropriate staff Technical Branch for review. Inclusion of this change in the conversion will depend on the results of that review.



SSES ITS 3.6.4.3 STANDRY GAS TREATMENT SYSTEM

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.3-6	JFD P2	STS 3.6.4.3 RA C.2 STS SR- 3.6.4.1.3 ITS 3.6.4.3 RA C.1 ITS SR 3.6.4.1.3 and Associated Bases	ITS 3.6.4.3 RA C.1, ITS SR 3.6.4.1.3 and Associated Bases change the STS wording from "SGT subsystem" to "SGT filter train." The change is designated P2 which states that the changes are made for clarity. The change does not improve clarity since ITS LCO 3.6.4.3, ITS 3.6.4.3 Condition A and RA A.1, ITS 3.6.4.3 Condition D and RA D.1, ITS 3.6.4.3 Condition E, ITS SR 3.6.4.3.3 and the Associated Bases all refer to the STS wording "SGT Subsystem."	1/21/97		Return the wording of ITS 3.6.4.3 RA C.1, ITS SR 3.6.4.1.3, and their associated bases to the STS wording "SGT Subsystem."
3.6.4.3-7	JFD P2	STS SR 3.6.4.3.1 ITS SR 3.6.4.3.1	STS SR 3.6.4.3.1 states the following: "Operate each SGT subsystem for \geq [10] continuous hours with heaters operating." ITS SR 3.6.4.3.1 changes "operating" to "OPERABLE". This change does not meet the intent of the STS SR. The change would allow the SR to be performed without the heaters on. The change is unacceptable.	1/21/97		Return the wording to "operating".

SSES ITS 3.6.4.3 STANDRY GAS TREATMENT SYSTEM

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.3-8	JFD P3	CTS 4.6.5.3.d.3 ITS SR 3.6.4.3.4 and Associated Bases	CTS 4.6.5.3.d.3 verifies that the filter cooling bypass and outside air dampers open and the fan start on filter cooling initiation. ITS SR 3.6.4.3.4 performs the same test but initiation is by high charcoal temperature. The CTS requirement of "on filter cooling initiation" would allow for manual as well as any associated automatic initiation. The Bases changes associated with this change are designated P3 which is a general editorial/clarity justification. The CTS markup does not show this change. No justification or designation has been provided for this more restrictive change.	1/21/97		Provide justification, discussion, and appropriate CTS markups for this more restrictive change.

SSES ITS 3.6.4.3 STANDRY GAS TREATMENT SYSTEM

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.3-9	JFD P3	CTS 4.6.5.3.d.3 ITS SR 3.6.4.3.4 and Associated Bases	CTS 4.6.5.3.d.3 verifies that the filter cooling bypass and outside air dampers open on filter cooling initiation. ITS SR 3.6.4.3.4 performs the same test with the exact same wording for filter cooling bypass and outside air dampers. The Bases for ITS SR 3.6.4.3.4 uses the words "filter train cooling and cross tie dampers". No justification is provided as to why the Bases differs from the CTS or the ITS SR, other than P3 which is a generalized editorial/clarity justification. In this case P3 does not apply here.	1/21/97		Provide justification and discussion for this change and make the ITS consistent.

SSES ITS 3.6.4.3 STANDRY GAS TREATMENT SYSTEM

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.3-10	None and JFD P3	STS B3.6.4.3 Bases BACKGROUND ITS B3.6.4.3 Bases BACKGROUND and LCO	STS 3.6.4.3 Bases BACKGROUND section states that the SGT system consists of duct work and other components. ITS B3.6.4.3 Bases BACKGROUND section and LCO section insert B.3-110-1 do not mention duct work as part of the system or consider it as required for SGT system operability.	1/21/97		Provide justification and discussion for why the SGT duct work is not considered required for system operability based on current licensing basis, system design, or operational constraints.

SSES ITS 3.6.4.3 STANDRY GAS TREATMENT SYSTEM

ITEM No.	DOC/JFD	CTS/STS LCO	DESCRIPTION OF ISSUE	DATE OPENED	DATE CLOSED	COMMENTS
3.6.4.3-11	None and JFD PE	STS B3.6.4.3 Bases BACKGROUND ITS B3.6.4.3 BACKGROUND and LCO	STS B3.6.4.3 Bases BACKGROUND section states that the SGT system consists of a charcoal filter train and other components. It then describes the components in the charcoal filter train. ITS B3.6.4.3 Bases BACKGROUND and LCO section insert B.3-110-1 deletes the word "charcoal" from "charcoal filter train" except for the paragraph which describes the components which constitutes the charcoal filter train.	1/21/97		Provide a discussion as to why the word "charcoal" was deleted from "charcoal filter train" in the Bases for B3.6.4.3 except for this one paragraph in the BACKGROUND section.



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SSESCTS Markup3.8.1Page 3/4 8-1

3.8.1.1.b.1 L-15

The proposed change does not appear to be acceptable. The licensee has not provided an adequate justification for the change (note that operating convenience is not an adequate justification). The licensee should provide the necessary justification or retain the CTS 1 hr. fuel oil requirement.

3.8.1.1.b Note +

Deletion of part of this Note is classified more restrictive M.6. The justification, however, is not clear. Some additional information regarding DG substitutions is required. (see EBT comments Pg. 1.a & 1.5, these comments).

Page 3/4 8.2

3.8.1.1.C A.2

The proposed change does not appear to be acceptable. CTS 3.8.1.1.C addresses one offsite and 1 DG inop., period. Cond. G. addresses 2 offsites and 1 DG inop., and references LCO 3.8.7. In CTS, the plant status in proposed Cond. G would require entry into LCO 3.0.3. The ITS appears to be less restrictive than the CTS, but adequate justification is not provided. The submittal should be revised to provide the necessary justification.

3.8.1.1.C.4 L.2

Change L.2 does not appear to be acceptable. The DOC does not convey a convincing argument in support of the proposed change. Also, Note that the proposed change is BEYOND SCOPE of an ITS conversion.

Page 3/4 8-2a

3.8.1.1.f4 L.2

The change does not appear to be acceptable. See comments re: L.2 for 3.8.1.1.c.4, above.

3.8.1.1.f.2

Change (L.4) does not appear to make sense. RA 3.8.1.1.f.3 only allows 2 hours to restore 3 (or more) EDGs to OPERABLE, but 3.8.1.1.f.2 would allow 24 hours to test the remaining OPERABLE EDGs. If 3 EDGs are not restored to OPERABLE, the plant will be on a shutdown track long before the 24 hours is up and long before any reasonable time necessary to adequately prepare for EDG testing has passed. In addition, if 3 EDGs are restored to OPERABLE, the plant will be on a shutdown track long before the 24 hours is up and long before any reasonable time necessary

to adequately prepare for EDG testing has passed. In addition, if 3 EDGs are restored to OPERABLE, testing may not be required, if the absence of common mode failure can be determined.

Page 3/4 8-3

4.8.1.1.b L.12

The proposed change does not appear to be acceptable. The DOC does not provide a convincing argument in support of the change.

4.8.1.1.b LB.1

The proposed change does not appear to be acceptable. The DOC does not address extension of this SR frequency from 18 months to 24 months (the introduction addresses this SR, but the body of LB.1 does not.) Also, this change is BEYOND SCOPE.

4.8.1.1.2.a

Change (L-5) appears to be acceptable. However, the justification appears to be improper for this change. Staggered Testing of the four EDG on a 31 day schedule would mean that a different EDG would be tested every 31 days until all 4 EDGs were tested, and they cycle would begin again. However, the requirement for testing EDGs is EACH EDG at least once EVERY 31 days. The rationale for deleting "Staggered Test Basis" from this SR should be that it is inappropriate and contradicts the actual intended frequency. The gibberish in L-5 regarding EDG reliability should be deleted and replaced with something like the above discussion. The only restriction on EDG testing is that it only be conducted on one EDG at a ?

4.8.1.1.2.a.1

4.8.1.1.2.a.3

Change (L.6) appears to be acceptable. However, the justification does not appear to directly address the issue, i.e., does not say why a 31 day frequency for these SRs is acceptable. The fact that EDGs will no longer be subject to accelerated testing is something less than adequate in way of a justification. (L.6 is MOOT since LA.1 is Not Acceptable)

4.8.1.1.2.a.4

Justification L.6 does not appear to be appropriate for this change. L.6 is applicable to specific SRs, and this is not one of them. A proper justification should be provided.

4.8.1.1.2.a.4

Change (L.9) is acceptable in concept. However, the justification does not positively state that SSES has the capability to conduct a modified start, and uses this capability. Absent this capability, all EDG starts must be fast starts, and the ITS should not include any reference to modified start.

4.8.1.1.2.a.4 M.10, M.11

The staff does not agree with the classification of these changes. One part of the change (i.e., decreased frequency tolerance) is indeed More



Restrictive. However, deletion of the upper voltage and frequency valves is a Less Restrictive change which is not addressed. The submittal should be revised to provide a justification for the less restrictive aspect of the change. This should include a discussion of the Bases section that will address monitoring and tending of the time required to achieve steady state voltage and frequency.

4.8.1.1.2.a.4 LA.1

DOC LA.1 is not acceptable, and the associated changes are also not acceptable. The DOC addresses regulatory activities (implementation of GL94-01) that will be conducted outside the conversion process. The license amendment that implements the ITS can only address what exists at the time the amendment is issued. It can not address future regulatory issues. The submittal should be revised to provide a "stand along" justification, or CTS requirements should be retained.

4.8.1.1.2.b?

Do the EDGs at SSES have integral (engine mounted) fuel oil day tanks? This is not the usual configuration.

4.8.1.1.2.a.5

Change (L.13) is acceptable. However, the latter part of the justification which discusses the post accident loading at SSES should be deleted. This material is irrelevant. The actual loads a EDG may see have no bearing on testing at rated load. Testing at rated load provides assurance that the EDG has not degraded and is capable of powering loads of any magnitude up to and including the rated load of the EDG.

4.8.1.1.a.4 L.10

This change add a Note to proposed SR 3.8.1.3 which allows the SR to be alternated between Unit 1 and Unit 2. This is acceptable. However, the proposed Note also contains a provision which essentially states that performance of the SR on Unit 2 is not actually required. This is Not Acceptable. A part of this SR is to also test the DG breakers. As worded, the proposed Note would allow unlimited plant operation for up to 24 months without testing the Unit 2 DG breaker and associated controls. The submittal should be revised to delete the unacceptable part of the Note.

Page 3/4 8-4

4.8.1.1.2.d

Change (LB.1) is not acceptable. The justification does not convey a convincing argument in favor of the frequency extension from 18 months to 24 months. Also, this is BEYOND SCOPE.

4.8.1.1.2.d

Change (LA.3) is not acceptable. The justification does not address the 4 criteria of the final policy statement with respect to this relocated requirement. In addition, the justification does not address the control mechanisms associated with the TRM (i.e., part of UFSAR under 10 CFR

50.50, or what) Consider also making this a part of the Maintenance Rule Program.

4.8.1.1.2.d.2

Change (LA.4) appears to be acceptable. However, some clarification is required. Specifically, what is the method used at SSES to conduct this SR? With the EDG, only, powering the ESF bus and rejecting the actual load? Or paralleled with the grid and opening the EDG output breakers? If it is the first method, the actual load needs to be specified by name.

4.8.1.1.2.d.2

4.8.1.1.2.d.3

4.8.1.1.2.d.4.b

4.8.1.1.2.d.5

The proposed ITS indicate that the maximum allowable voltage excursion during conduct of these SRs is 440VAC. Is this really achievable, especially for the full load reject SR? (See (M.10))

4.8.1.1.2.f.5.b M.10, M.11

4.8.1.1.2.d.5

One part of this change (i.e., decreased frequency tolerance) is indeed More Restrictive. However, the deletion of the upper voltage and frequency values is a Less Restrictive change. M.11 does not address this. The submittal should be revised to provide a justification for the less restrictive aspect of the change, including a discussion of the Bases section that covers monitoring of the time to achieve steady state voltage & frequency.

NOTE**

A.10

This discussion refers to DG "rapid loading that may be inferred but not required." This statement is confusing. Rapid loading of DGs either is, or is not required. The intent of this Note is to positively identify when fast loading is not required, or, conversely, when rapid loading is required. The proposed use of this permissive in the SSES ITS results in at least 3 SRs where rapid loading is not required but the Note providing the exception is not used. Consequently, fast loading could be considered a requirement for these SRs, and failure to do rapid loading could mean failure of the SR. The licensee should reconsider the applicability of this Note such that the discussion need only state that the generic permissive in CTS is applied on a specific bases in ITS.

4.8.1.1.2.d.7

Discussion A.8 appears to be misleading. CTS SR 4.8.1.1.2.a.4 includes 4 start signals to the DG, not just a LOOP signal. The rationale of A.8 is equally applicable to the other 3 start methods as it is to the LOOP signal. The licensee should consider revising this discussion.



See also previous comments re: discussions M.10 and M.11 being, in part, less restrictive changes. M.10 will relax the voltage tolerance requirements imposed by CTS SR 4.8.1.1.2.a.4 - this is less restrictive and must be addressed. It would appear that M.11 is also applicable here. Has there been an omission?

4.8.1.1.2.d.8 M.3

The DOC indicates that Power Factor requirements are added to ITS SR 3.8.1.15. The ITS does not include such a requirement. Some correction is required here.

NOTE ** A.10

See previous comments re: Note ** and A.10.

Page 3/4 8-6

4.8.1.1.2.d.12

The proposed relocation of Table 4.8.1.1.2-2 to the ITS Bases is Not Acceptable. Contrary to discussion LA.5, ITS SR 3.8.1.18 (SR 3.7.1.17 in LA.5) does not include the $\pm 10\%$ (+20% , -10% for RHR pumps) tolerances from the CTS. In addition, this change is Not Consistent with NUREG-1433 as stated in LA.5. The proposed ITS must be revised.

The proposed change associated with discussion M.2 is not clear. Does the SSES design include separate sequence timers for sequencing safety loads onto the offsite circuits; i.e., one set of timers for the DGs and another set of timers for the offsite? If this is the case, ITS SR 3.8.1.18 must be revised to reflect both sets of timers (in addition to the tolerance valves).

4.1.1.2.d.13

The proposed change is acceptable. However, discussion LA.8 should actually be a Less Restrictive rather than an Administrative change. Also, the discussion should identify the controls for the TRM.

4.1.1.2.e

Deletion of the CTS requirement addressed by discussion A.14 is Not Acceptable. The discussion addresses maintenance in a general sense, but does not make a case regarding the CTS requirement; i.e., "maintenance which could affect DG independence". A specific justification for the change must be provided, or retain the CTS requirement.

4.8.1.1.3.a

Discussion LA.2 is Not Acceptable, and the associated changes are also Not Acceptable. The discussion addresses regulatory activities (implementation of GL 94-01) that will be conducted outside of the ITS conversion process. The license amendment that implements the ITS can only address what exists at the time the amendment is issued. It can not address future regulatory issues. The submittal must be revised to

provide a "stand-alone" justification for the change, or CTS requirements must be retained.

4.8.1.1.3.a.1

Discussion L.6 by itself is Acceptable. However, the change on which it is dependent (LA>1) is Not Acceptable. Therefore, L.6 is MOOT pending resolution of the issue with LA.1.

Page 3/4 8-6a

4.8.1.1.3.a.3 L.6

See comments re: L.6 for 4.8.1.1.3.a.1, above.

4.8.1.1.3.a.4 M.15

Proposed changes to the voltage requirement of this SR are indicated as being covered by DOC M.15. There is no M.15 in the SSES submittal for 3.8.1.

Also, see comments re: M.10 and M.11 for SR 4.8.1.1.2.a.4 (Page 3/4 8-3). Those comments are applicable to these proposed changes.

A Note is added to Proposed ITS SR 3.8.1.3 (L.10) which allows the SR to be alternated between Unit 1 and Unit 2. This is Acceptable. However, the Note also contains a provision which essentially states that performance of the SR on the Unit 2 bus is not actually required. This is Not Acceptable. A part of this SR is to also test the DG breakers. As worded, the proposed Note would allow unlimited plant operation for up to 24 mos. without testing the Unit 2 DG breaker and associated controls. The submittal must be revised to delete the unacceptable part of the Note.

4.8.1.1.3.d.1

See comments re: LB.1 for SR 4.8.1.1.1.b (Page 3/4 9\8-3) and SR 4.8.1.1.2.d (Page 3/4 8-4).

4.8.1.1.3.d.1

See comments re: LA.3 for SR 4.8.1.1.2.d.1.
See previous comments re: M.10 and M.11 for SR 4.8.1.1.2.d.2.

Note **

See comments re: this Note on Page 3/4 8-4 (A.10)

Page 3/4 8-6b

4.8.1.1.3.d.5

See comment re: LA.8 for SR 4.8.1.1.2.d.13 (Page 3/4 8-6).

4.8.1.1.3.d.6.a.i)b)

4.8.1.1.3.d.6

See comments re: M.10 and M.11 for SR 4.8.1.1.2.d.2



Page 3/4 8-6c

4.8.1.13.d.6.a.iii)b)

4.8.1.1.3.d.6.b.i)

See comments re: M.10 and M.11 for SR 4.8.1.1.2.d.2.

Page 3/4 8-6d

4.8.1.1.3.d.6.b.ii)

4.8.1.1.3.d.6.b.iii)

See comments re: M.10 and M.11 for SR 4.8.1.1.2.a.4.

Page 3/4 8-7

Table 4.8.1.1.2-1

See comments re: LA.1 for SR 4.8.1.1.2.a (Page 3/4 8-3)

Page 3/4 8-8

Table 4.8.1.1.2-2

See comment re: LA>1 for R 4.8.1.1.3.a. and SR 4.8.1.1.2.a.



SSES CTS MARKUP

Unit 2

3.8.1

Page 3/4 8-1

LCO 3.8.1.1.a

Change M.1 does not appear to be correct. CTS is silent on the Unit 1 AC sources, but the definition of OPERABILITY includes BOTH off-site and on-site power. The ITS definition allows systems/components to be OPERABLE with off-site or on-site power available. An inoperable AC source to any of the safety equipment required by Unit 2 makes that system/component inoperable, and the applicable LCO would be entered. The ITS specify the Unit 1 off-site sources required for Unit 2, but will not require the systems/components of Unit 2 to be declared inoperable in the event of a loss of offsite or on-site power. This appears to be a less restrictive change, and DOC M.1 does not provide a justification for the change. The submittal should be revised, accordingly.

Page 3/4 8-6a

SR 4.8.1.1.4

Proposed Insert 5.6-1 references both RG1.9, Rev.3, and RG1.108. This is not acceptable. RG1.9 Rev.3 incorporates RG1.108- the two RGs can not exist or be referenced simultaneously.

?Question? Why is there a reporting requirement in Unit 2 but none for Unit 1? Is something omitted?

> SSES CTS MARKUP

3.8.2

Page 3/48-9

LCO 3.8.1.2.b.1

Change A.5 is Not Acceptable. A. 5 references L.15 for LCO 3.8.1 & L.15 is Not Acceptable. The 1 hr. fuel requirement in CTS should be retained.

LCO 3.8.1.2.b.2

Change M.1 appears to be a subset of A.5, above. DOC M.1 in the LCO 3.8.2 discussions is only applicable to Unit 2. This appears to be an error in the submittal.

SR 4.8.1.2

Change L.1 is acceptable in concept. However, the discussion should be expanded to address those SRs from LCO 3.8.1 which are Not Applicable in MODES 4 & 5 and therefore do not have to be Met or Performed.

?Question?

Consider Unit 1 in refuel and Unit 2 at power. Unit 2 requires 4 DGs to be OPERABLE, and OPERABILITY is established by performance of SRs. If the required SRs for Unit 2 are not performed on the DGs that satisfy the Unit 1 shutdown requirements, how can Unit 2 remain at power??

Change L.2 is confusing. The concept addressed by this DOC is understandable as well as Acceptable. However, ITS LCO 3.8.2 does not reflect this DOC; i.e., both Units in Mode 4 or 5.



SSES CTS MARKUP

Unit 2

3.8.2

Page 3/4 8-10

LC0 3.8.1.2.a

Change M.1 indicates that a requirement for Unit 1 offsite power sources is to be added to the Unit 2 CTS. However, no insert was included in the 3.8.2 submittal. What is intended to be included here?

LC0 3.8.1.2.b.1

Change A.5 to Unit 1 LC03.8.1.2.b.1 adds the day tank requirement for OGE. Why is the requirement not included in the Unit 2 TS?

SSES CTS MARKUP3.8.3Page 3/48-1

LC0 3.8.1.1.b.2

Change L.3 is Acceptable, but a question exists. Has the (U)FSAR been updated to reflect this change? Also, the DOC indicates that DG fuel consumption rates were determined using the "highest heat value fuel". Is this the most conservative approach? Would it not be better to establish fuel consumption rates using the lowest heat value fuel.

LC0 3.8.1.1.b.3

Change L.1 is essentially Acceptable. However, the DOC could be improved by adding verbiage to the effect that a limited amount of time to restore fuel oil, lube oil, or starting air to within limits represents less risk than possibly requiring a plant shutdown, and is therefore an enhancement in safety. L.1 does not discuss allowing 30 days to restore stored fuel to within limits - must be added.

SR4.8.1.1.2.e

Change LA>1 includes a discussion regarding moving this CTS requirement to the TRM. The DOC does not, however, address the controls associated with the TRM. The discussion should be revised to provide this information.

The DOC also does not address the CTS requirement to pressure test the F.O. storage tank in accordance with ASME Code Section II, etc. The licensee should provide additional discussion regarding where this requirement will be moved to (i.e., TRM) and what controls will be applicable, or retain the requirement in TS.

SSES CTS MARKUP3.8.4Page 3/4 8-10

LCO 3.8.2.1.a.4

Change LA.1 does not appear to be acceptable. The DOC does not provide an adequate justification for the change. The DOC should be revised to address the 4 Criteria in the Final Policy Statement with respect to the 24 Vdc battery. In addition, the DOC should address why it is acceptable to delete the power source for SRMs and IRMs from TS while retaining in TS the power source for all other instrumentation and the RPS.

Page 3/4 8-10a

LCO 3.8.2.1.b.4

See comments for LA.2, above.

Page 3/4 8-11

LCO 3.8.2.1., Action d

See comments re: Change LA.1 above.

LCO 38.2.1., Action f

Change A.5 is Not Acceptable. Also, the ITS that is reflected by this change is incomplete. There is no default statement in the CTS or the ITS. Therefore, failure to implement the Required Actions within the allowed completion time results in an unanalyzed Condition and entry into LCO 3.0.3. This should be corrected.

?Question?

Why is it acceptable to wait for 2 hours to declare DG E inoperable if the DC subsystem for DG E is inoperable and DG E is substituted for another DG? Does this need to be corrected in the ITS?

Deleting the "restore" option is acceptable when viewed in a specific way. However, in doing so, the TS become inconsistent, i.e., Action C.1 is not consistent with Action A.1. It is suggested that the "restore" option be retained in all the ITS even though it explicitly states what is already implicit in the LCOs.

Page 3/4 8-11a

SR 4.8.2.1

See previous comments re: change LA.1

SR 4.8.2.1.a.2

See previous comments re: change LA.1

SR 4.8.2.1.a.2

Change L.4 is acceptable in concept. However, the frequency column in the ITS should be changed. The 14 day maximum time that the SR may be deferred should be included in the Note, not in the frequency column. Also, the licensee should expand DOC L.4 to state why "meaningful results can not be obtained when the battery is or has recently been on an equalizing change."

A change per DOC L.6 is indicated in the CTS markup. However, there is no DOC L.6 in the 3.8.4 section of the submittal.

SR 4.8.2.1.b

See previous comments re: Change LA.1

SR 4.8.2.1.b.2

Change L.3 is acceptable in concept. However, DOC L.3 includes the term "negligible impact." What does this mean? Can it be quantified?

This is a generic comment that includes other such non-quantifiable terms as "significant." Such terms are inappropriate for use in a staff SE and, since the SE is based on licensee input, should not be included in the licensee submittal.

There is a serious problem with change M.3. As proposed, the ITS would allow a battery terminal resistance of 65×10^{-6} ohms (125Vdc) and 55×10^{-6} (250 Vdc) in the presence of corrosion. However, proposed ITS SR 3.8.4.5 requires a terminal resistance of $\leq 50 \times 10^{-6}$ ohms (measured every 10 mo.). If ITS SR 3.8.4.2 is performed and terminal resistance is found to be $> 50 \times 10^{-6}$ ohms even though it is $< 65 \times 10^{-6}$ ohms, the associated battery is inoperable. See SR 3.0.1. ITS SRs 3.8.4.2 and 3.8.4.5 are not compatible. This must be corrected.

Page 3/4 8-12

SR 4.8.2.1.C.2

Change L.1 - Is deletion of torquing requirements consistent with IEEE-450 (1995)? If so, it should be stated in the DOC.

SR 4.8.2.1.C.4

Change LB.1 (18 months to 24 months extension) needs to be reviewed by EELB.

SR 4.8.2.1.C.4.a

See previous comments re: Change LA.1

SR 4.8.2.1.C.4.b-d

Change LA.4 is Not Acceptable. The proposed change is not consistent with NUREG-1433, and DOC LA.4 does not provide a stand-alone justification for the change. Also, justification for changing 258.6Vdc to 2556Vdc.

SR 4.8.2.1.d

See previous comments re: Change LB.1



SR 4.8.2.1.d.2

Change LA.3 - What are the control mechanisms associated with the TRM?

SR 4.8.2.1.d.2.a

See previous comments re: Change LA.1

SR 4.8.2.1.d.2.b,c

Change LA.3 - What controls are associated with the TRM?

Page 3/4 8-13

SR 4.8.2.1.d.2.b,c

See previous comments re: Change L.4. Also, is the Note addressed by L.4 really applicable to ITS SR 3.8.4.8.

SR 4.8.2.1.e

Change L.5 is essentially acceptable. However, the DOC includes a definition of a modified performance discharge test which could be misinterpreted. Specifically, the DOC states that the long term discharge is conducted at the "test rate employed for the performance test>" This long term discharge rate should be a function of the actual load such that it envelopes the largest emergency load following the 1 minute discharge. The DOC should be revised to ensure that this distinction is included.

Add Comment re: deletion of battery charger numerical acceptance criteria. (LA.3)

SSES CTS MARKUP

Unit 2

3.8.4

Page 3/4 8-12

LCO 3.8.2.1, Action b

As worded, Action b. allows the common loads to be transferred from the Unit 1 DC source to the Unit 2 DC source. The completion time is 2 hours. ?Question? LCO 3.8.4 (ITS) has a Condition for one DC subsystem inoperable with an Action to restore within 2 hours. Failure to restore within the specified time results in a Unit 1 shutdown. There is no allowance for transferring common loads to the Unit 2 battery. Is this correct?

Page 3/4 8-12a

SR 4.8.2.1

Change M.2 would add SR3.8.4.9 to the Unit 2 ITS. The SR states that the SRs for the Unit 1 DC sources required by Unit 2 are applicable. This is acceptable. However, the proposed SR includes a Note which essentially states that the required SRs need not be performed. This creates a problem. The Unit one batteries (DC Sources) must undergo surveillance testing in order to establish OPERABILITY. However, these SRs can only be performed in Modes 4 or 5. With Unit 2 at power, the Note in proposed SR 3.8.4.9 would preclude conducting the required SRs on the Unit 1 DC sources because in doing so the Unit 1 DC source must be made inoperable. This Note represents a blanket exception to the OPERABILITY requirements for a safety system/component required by a plant at power. This proposed SR and associated Note require further discussion.



SSES CTS MARKUP

3.8.5

Page 3/4 8-15

LCO 3.8.2.2.a.4

LCO 3.8.2.2.b.4

Change LA.1 is Not Acceptable. See comments re: LA.1 for LCO 3.8.4.

Page 3/4 8-16

LCO 3.8.2.2.C.1 & 2

LCO 3.8.2.2.d

DOC A.2 addresses DC power in MODES 1-3. This LCO covers Modes 4 & 5, and A.2 is Not Applicable. the submittal should be revised to provide the appropriate justification for the change.

LCO 3.8.2.2.e

Change LA.2 is Not Acceptable. See comments re: LA>1 for LCO 3.8.4.

NOTE: The DOCs for LCO 3.8.5 include DOC M.4. However, there is no corresponding CTS markup for this DOC. What is the purpose of this DOC? has something been omitted from the CTS markup?

SSES CTS MARKUP

Unit 2

3.8.5

Page 3/4 8-17a

SR 4.8.2.2

Change L.1 proposed to make the Note from Unit 1 SR3.8.5.1 applicable to Unit 2 SR3.8.5.2 when Unit 1 is in Modes 4 or 5. This appears to be acceptable since Unit 2 would also be in Mode 4 or 5. However, the effects of this proposed change must be reviewed in detail as part of the discussion on change M.2 for CTS SR4.8.2.1 (ITS LC03.8.4)



SSES CTS MARKUP3.8.6Page 3/4 8-11a

SR 4.8.2.1.a.1

Change L.4 would allow verification of Category A limits every 7 days to be extended for up to 4 days if the affected battery has been on equalizing charge. This appears to be acceptable for electrolyte level and specific gravity. However, the additional 4 days for float voltage is not understood. In LCO 3.8.4, 24 hours is considered adequate time for float voltage to stabilize following an equalizing charge. What is different here? Also, the 24 days limit should be moved up into the proposed Note - it is confusing in the frequency column.

NOTE: This, and the corresponding change in LCO 3.8.4 are beyond scope and should be perused as generic issues by TSTF.

NOTE: This submittal is poorly annotated. It is not possible to establish, with any degree of certainty, what change are applicable to LCO 3.8.4 and what changes are applicable to LCO 3.8.6.

SR 4.8.2.1.a.2

SR 4.8.2.1.b

Change LA.1 is Not Acceptable. See comments for LA.1 for LCO 3.8.4.

SR 4.8.2.1.b.3

Change LA.1 is Not Acceptable. See comments for LA.1 for LCO 3.8.4.

Change LA.2 is Not Acceptable. IEEE-450 (1995) does not include a definition of "representative cells," and does not appear to include any suggestions regarding the sample size. The submittal should be revised to retain the CTS requirement of 10 or 20 cells.

Page 3/4 8-14

Table 4.8.2.1-1

Change L.5 is Not Acceptable for the following reasons:

- the proposed change is outside the scope of ITS conversion
- the licensee references IEEE-450, 1995 in this DOC, but references the 1987 version for other DOCs, and, in one case, provides no revision reference at all. The submittal should only reference one version of IEEE-450.

Change LA.1 is Not Acceptable. See comment on LA.2 for LCO 3.8.4.

A change A.5 is indicated, but there is no DOC A.5. Clarification is required.

SSES CTS MARKUP

3.8.7

Page 3/4 8-17

LCO 3.8.3.1.a.1.c.SES

Change LA.3 is acceptable in concept. However, the discussion of what is required for the 480 VAC swing bus to be OPERABLE should be in the Bases. The submittal should be revised accordingly.

Page 3/4 8-17a

LCO 3.8.3.1.a.2.c.SES

See discussion for change LA.3, above.

Page 3/4 8-18

LCO 3.8.3.1.b.1.d

LCO 3.8.3.1.b.2.d

Change LA.2 is Not Acceptable. This is a subset of Change LA.1 in LCO 3.8.4. See comments on LA.1 for LCO 3.8.4.

Page 3/4 8-18a

LCO 3.8.3.1, Action a & b

Change L.1 is Not Acceptable. DOC L.1 does not address the addition of "or more" to the CTS requirement. The change is not adequately justified and is, therefore, not acceptable. It should also be noted that the staff has not accepted this change on a generic basis (TSTF-16).

LCO 3.8.3.1, Action e

Change LA.2 is Not Acceptable. See comments on LA.2, above.

Page 3/4 8-18b

LCO 3.8.3.1, Action i

Change L.1 is Not Acceptable - see discussion, above.

SSES CTS MARKUP

Unit 2

3.8.7

Page 3/4 8-19

LCO 3.8.3.1.b.3

?Question? Why is the DG e RVVdc bus retained in this TS? This DC subsystem only serves DG e, and its failure means that DG E is inoperable. The Note in proposed Condition H of ITS LCO 3.8.7 represents a potential 3.0.3 situation because the LCO does not include an Action for DG E when its DC bus is inoperable. This item requires more discussion. (This item is also applicable to Unit 1.)

SSES CTS MARKUP

3.8.8

Page 3/4 8-20

LCO 3.8.3.2.b

Change M.1 appears to be incorrect. Deletion of the word "or" adds confusion with respect to what DC power distribution systems must be OPERABLE.

LCO 3.8.3.2.b.1.d

LCO 3.8.3.2.b.2.d

Change LA.2 is Not Acceptable. See comments. re: change LA.1 for LCO 3.8.4.

Page 3/4 8-21

LCO 3.8.3.2, Action b.

LCO 3.8.3.2, Action c

Change M.1 is acceptable. However, there is a question regarding whether or not addition of the "option" to declare associated supported features inoperable is more restrictive. Since this addition provides an Action that did not previously exist, it would appear this change is actually less restrictive. A revision to the submittal to reflect this should be considered.



NUREG MARKUP

3.8.1

Page 3.8-1

LCO 3.8.1

Change P.2 does not include any of the CTS material regarding when and how the LCO Actions for 1 DG inoperable are entered. See also comments re: P.3 in Bases comments.

Page 3.8-3

LCO 3.8.1 Condition B

Change P.4 is Not Acceptable. As proposed, the SSES ITS takes the best parts of the NUREG-1433 and CTS. This is not the intent of ITS conversions. Either take the NUREG totally, or retain CTS totally. [Proposed TS adopt Req. Act. B.3.1. AND modify Req. Act. B.3.2 to reflect CTS]

Insert comment re: Action C.1 and DOD P.3 from Bases comments

Page 3.8-4

LCO 3.8.1 Condition D P.5

Deletion of the Note in Condition D is acceptable. The staff agrees that the loss of one startup x fmr. would not result in an ESF bus w/o offsite power unless there was another, coincident failure. However, P.5 is not acceptable because of the reference to proposed new Condition G. This proposed Condition is not in the SSES CTS, nor is it found in NUREG-1433. the proposed change is, therefore, beyond the scope of ITS conversion.

[NOTE: This issue may have to be revisited when the licensee provides an answer to how inoperability of one or more ESF x fmrs. is to be handled]

Observation: Proposed Condition G appears to Contradict DOD P.5. P.5 takes the position that with one offsite ckt. inoperable, there is always a second offsite ckt. available. Condition G, however, is that condition of 2 offsite ckts. inoperable, there is always a second offsite ckt. available. Condition G, however, is that condition of 2 offsite ckts inoperable to ONE ESF Bus. To accomplish this. There would have to be: 1) multiple failures of ESF transformers which would mean multiple ESF busses are involved, or 2) multiple failures of one ESF bus feed breakers. This is not a likely scenario. More discussion is required.



Page 3.8-5

LCO 3.8.1, Condition F

Change P.6 deletes NUREG Condition F. This is acceptable because SSES uses individual timers. However, DOD P.6 includes a statement that failure of a timer would inop. the associated DG or offsite source. Is this correct? If it is, this LCO and all others in the SSES ITS Section 3.8 need some serious revision.

LCO 3.8.1, Condition H

Change P.7 is acceptable except for the part about "reasons other than Condition G." Proposed Condition G is not acceptable as discussed above. Therefore, this reference to it is also Not Acceptable.

Page 3.8.6

SR 3.8.1.2

Change P.8 is acceptable in concept. However, the SR does not make any reference to alternating the SR between units; i.e., conducted from Unit 1 for one SR and from Unit 2 for the subsequent performance, etc. The submittal should be revised to reflect this.

Change P.9 is Not Acceptable. Generic change BWROG-18, which is the basis for this change, has not been accepted by the staff.

Change P.10 is Not Acceptable. The DOD should be revised to reflect implementation of the Maintenance Rule and delete reference to GL 94-01. The DOD should also state what will control DG accelerated testing in the future.

Page 3.8-7

SR 3.8.1.3

Change P. 11 is acceptable except for the last part of Note 6. As stated, the last part of the Note totally negates the beginning requirement to alternate between Units. This is Not Acceptable. The submittal should be revised to address this issue.

Change P. 10 is Not Acceptable. See previous comments.

SR 3.8.1.4

Insert 3.8-7-03 is Not Acceptable because this is a Less restrictive change that is Not Acceptable. (see Comment on CTS markup-same subject.)

SR 3.8.1.7

Insert 3.-8-02 (P.9) is Not Acceptable. See previous comments re: P.9.

SR 3.8.1.8

Change P. 12 is Not Acceptable. Performance of this and other SR s have the potential for causing perturbations to the electrical power systems and should not be done at power.

The change form 18 month to 24 month frequency is outside the scope of ITS conversion. In addition, it has not been adequately justified. (See comments on CTS markup for this issue).

Page 3.8-9

SR 3.8.1.12

Change P.12 is Not Acceptable. See comments, above.

Frequency change from 18 months to 24 months is Not Acceptable.

SR 3.8.1.10

Change P. 12 is Not Acceptable. See comments, above.

Change P. 13 is confusing. Is it possible to load a DG to 4000 Kw while connected only to an ESF bus? If so, please provide an explanation. If not, what is the purpose of change P. 13?

The change in frequency from 18 months to 24 months is Not Acceptable.

Page 3.8-10

SR 3.8.1.11

Change P.12 is Not Acceptable - see comments, above.

Change P. 11 is under staff review. As proposed, Insert 3.8-10-01 would allow DG E to be substituted for DGs A-D without having demonstrated electrically that the substitution works. Performance of this SR in the test facility does not demonstrate this. Consequently, if more than 18 months has passed without an actual substitution and SR performance, the E DG must be considered inoperable, and it cannot be substituted for any of the other DGs. Since the above discussion is at odds with the SSES CTS, further staff review is required.

What change to this SR is reflected by DOD P.14?

Page 3.8-11

SR 3.8.1.12

Change P.12 is Not Acceptable - see previous comments.



SR 3.8.1.12

Change P.11 is being reviewed by the staff. See previous comments.

Frequency change from 18 months to 24 months is not acceptable - see previous comments.

Change P.9 is Not Acceptable - See previous comments.

Page 3.8-12

SR 3.8.1.13

Change P. 11 is being reviewed by the staff. See previous comments.

Change P.8 is acceptable as far as it goes. However, it doe snot address alternate unit testing as described in Note 6 to SR 3.8.1.3.

Change P. 12 is Not Acceptable. See previous comments.

Frequency change from 18 months to 24 months is Not Acceptable - see previous comments.

Page 3.8-13

SR 3.8.1.14

Change P. 11 is being reviewed by the staff - see previous comments. [Proposed change is acceptable for this SR].

Change P.12 is Not Acceptable - see previous comments.

SR 3.8.1.14

Frequency change from 18 months to 24 months is Not Acceptable - see previous comments.

Change P.16 makes a statement but does not include any quantifying data, i.e., what is the excitation current at unity power factor and 4000 Kw as opposed to the excitation current at maximum post accident loading. This information should be provided in support of the proposed change.

SR 3.8.1.15

Change P.9 is Not Acceptable - see previous comments.

Frequency change from 18 months to 24 months is Not Acceptable - see previous comments.

Frequency change from 18 months to 24 months is Not Acceptable - see previous comments.

DE G is not addressed inthe Notes for this SR.



Page 3.8-14

SR 3.8.1.16

Change P.12 is Not Acceptable - see previous comments.

Change P.17 is Not Acceptable. The proposed SR Notes do not include any reference to Unit rotation such as described in Note 6 to SR 3.8.1.3. The submittal should be revised accordingly.

SR 3.8.1.16

Frequency change from 18 months to 24 months is Not Acceptable - see previous comments.

SR 3.8.1.17

Change P.12 is Not Acceptable - see previous comments.

Change P.17 is not acceptable - see comments on SR 3.8.1.16.

Frequency change from 18 months to 24 months is Not Acceptable - see previous comments.

Page 3.8-15

SR 3.8.1.18

Change P.14 is Not Acceptable. The proposed change does not include the acceptance criteria from CTS ($\pm 10\%$ of design setpoint.) This DOD also includes a discussion of what actions are appropriate when an individual timer is inoperable; i.e., the actions associated with an inoperable AC source. This part of the DOD is Not Acceptable because 1) there is no corresponding Condition or Required Action in LCO 3.8.1, and 2) the actions associated with the system/component made inoperable as a consequence of the timer failure should be followed, not the actions for an AC source.

Change P.12 is not Acceptable - See previous comments.

Frequency change from 18 months to 24 months is Not Acceptable - see previous comments.

SR 3.8.1.19

Change P.11 is being reviewed by the staff - see previous comments.

Change P.12 is Not Acceptable - see previous comments.

NOTE: The 18 month frequency is not indicated as changed from this SR.

?Question?

This SR (and SR 3.8.1.18) must be performed for each unit. How is this accomplished within the required frequency, assuming that one of the units is always at power?

SR 3.8.1.20

Change P.9 is Not Acceptable - see previous comments. .

Insert 3.8-16-02

The proposed SR (SR 3.8.1.21) appears to be acceptable. However, the proposed Note regarding SR 3.8.2.1 is Not Acceptable. The proposed Note brings into question the issue of a blanket exception to the definition of OPERABILITY with respect to SRs. See comments on CTS Markup for CTS SR 4.8.1.2 (ITS LCO 3.8.2)

NUREG MARKUP

3.8.2

Page 3.8.12

LCO 3.8.2, Condition A

Change P.3 is Not Acceptable. Condition A and Condition B do not have the same Required Actions, and combining the two Conditions into a single Condition is more than an administrative exercise. The proposed justification does not adeque

?Question?

What constitutes the "secondary containment"? Should the Applicability not read, in addition to Mode 4 and 5, during Core Alterations and during Movement of Irradicated Fuel?

Page 3.8-20

LCO 3.8.2, Condition B

Change P.3 is NOT Acceptable. See above.

SR 3.8.2.1

Reconsider

Change P. 4 is NOT Acceptable because the proposed change involves an issue that has not been accepted generically; i.e., what is the differnce between "met" and "perfomred." In addition to the lack of generic acceptance, the proposed Bases for this SR do not adequately address the issue.

Proposed insert 3.8-20-01 appears to be incorrect. As proposed, SRs 3.8.1.6 and 3.8.1.17 are applicable; i.., must be performed. It is not clear how these SRs will be performed on the DGs required by LCO 3.8.2. A detailed explanation is required.

The proposed Note to SR 3.8.2.2 is not clear. Some additional explantation is required.

?Question?

Assume Unit 1 in Mode 1 and Unit 2 in Mode 5. LCO 3.8.1 for Unit 1 requires 4 DGs to be OPERABLE, and performance of all required SRs establishes this OPERABILITY. LCO 3.8.2 requires 2 DGs to be OPERABLE, but exempts these 2 DG from performance of certain SRs. However, these 2 DGs are 2 of 4 required by LCO 3.8.1 for Unit 1. If the SRs exempted by LCO 3.8.2 for Unit 2 are not performed, the DGs may be considered OPERABLE, but the DGs affected are no longer OPERABLE with respect to Unit 1. ?How will this be resolved?



Met Not Perf.			
	performed	•A	1. Offsite Ckt. Check
	performed	•A	2. DG Start
Met		•A	3. DG Load
	performed	•A	4. Day tank Level
	performed	•A	5. Remove water - day tank
	PERFORMED	•A	6. Fuel oil system - x'fer fuel
	performed	•A	7. DG fast start
//////////	//////////	////	8. X'fer from normal to alt. offsite
Met		•A	9. Single load reject
Met		•A	10. Full load reject
Met		•A	11. Loop
	PERFORMED	•A	12. LOCA (only)
Met		•A	13. DG Auto Trips Bypassed
Met		•A	14. 24 hr. run
Met		•A	15. Hot restart
Met		•A	16. DG Transfer back to Offsite
//////////	//////////	////	17. Test Mode override
Met		•A	18. Interval between load blocks
Met		•A	19. LOOP/LOCA
			20. Simultaneous start - All DGs



NUREG MARKUP3.8.3Page 3.8-21

LCO 3.8.3, Condition A

Change P.2 is not necessary. The rules governing use of NUREGs/ITS cover this item. The proposed change will make the SSES TS different from other licensee's TS with the potential for confusion, but with no offsetting benefit.

LCO 3.8.3 Condition B

Change P.5 does not address the change to Required Action B.1. Is it the intent of this change to infer that the DG is inoperable if lube oil is not visible in the sign glass? If this is the case, the proposed Condition B appears to be wrong. Consider 1/4" of oil visible in the sight glass equals enough lube oil for 7 days, but no oil in the sight glass equals an inoperable DG. Some additional explanation is required here; i.e., w/no oil visible, oil level is indeterminate.

Page 3.8-22

LCO 3.8.3, Condition D

Condition E

See remarks for Change P.2, above.

LCO 3.8.3, Condition F

Change P. 2 is not necessary. The rules governing use of NUREGs/ITC cover this item. There is no adequate justification provided for making the SSES ITS look different when compared to other conversions.

Page 3.8-23

LCO 3.8.3, Condition F

Change P. 2 is not necessary. The rules governing use of NUREGs/ITC cover this item. There is no adequate justification provided for making the SSES ITS look different when compared to other conversions.

Page 3.8-23

SR 3.8.3.2

See previous comments re: Change P.5.

SR 3.8.3.6

Change P.3 is Not Acceptable. TSTS-02 is not approved, and changes referencing a proposed generic change must be considered as Not Acceptable until such time as the change is approved.



NUREG MARKUP3.8.4Page 3.8-24

LCO 3.8.4, Proposed Condition C & D

The proposed change reflects the SSES design and is, therefore, acceptable as far as it goes. However, there is no default condition provided (such as Condition B and proposed Condition F). Absent a default condition, 3.0.3 could be invoked. Some additional work is required here. (See comments re: Change A.5 for CTS markups)

Page 3.8-25

SR 3.8.4.1, Insert 3.8-25-01

See comments re: Change L.4 in CTS markup.

SR 3.8.4.2, Insert 3.8-25-02 P.5

The proposed SR has a serious problem and is, therefore, Not Acceptable. As proposed, SR 3.8.4.2 is in conflict with SR 3.8.4.5. See comments re: Change M.3 on Page 3/48-11a in CTS markup.

SR 3.8.4.3, Insert 3.8-25-03

Change P.6 is not clear. What criteria will be followed when determining "potential degradation"? Where are these criteria found? What controls are associated with the criteria? These questions need to be answered before the change can be found acceptable.

SR 3.8.4.4

No justification has been provided for the deletion of "clean and tight" from the SR. Note also the frequency change from 12 months to 18 months.

SR 3.8.4.5

Note the frequency change from 12 months to 18 months.

Page 3.8-26

SR 3.8.4.6

Change P.8 is Not Acceptable.

SR 3.8.4.6, Insert 3.8-26-01

Change P.9 is Not Acceptable. SSES CTS include specific acceptance criteria for battery chargers (i.e., amps and time) that should be retained in the ITS. The submittal should be revised accordingly.

The frequency change from 18 months to 24 months is Not Acceptable.

SR 3.8.4.7

Change P.8 is Not Acceptable.



The Frequency change from 18 months to 24 months is Not Acceptable.

Note: A modified performance discharge test (per IEEE 450-1995) can be performed in lieu of a service test at any time.

Page 3.8-27

SR 3.8.4.8

Change P. 8 is Not Acceptable.

Insert 3.8-27-01

Change P.2 is Not Acceptable. The Note to SR 3.8.5.1 for Unit 1 states that the Battery Charge, Battery Service, and Battery Performance tests are not required to be performed. However, the Unit 1 DC sources must be performed. However, the Unit 1 DC sources must be OPERABLE to support Unit 2, and OPERABILITY is determined by performance of SRs. The proposed Note amounts to a blanket exception to the definition of OPERABILITY and is, therefore, not acceptable. This portion of the submittal must be revised.



NUREG MARKUPS

3.8.5

Page 3.8-29

SR 3.8.5.1

The Note associated with this SR is not worded the same as the comparable Note in LCO 3.8.2. What is the reason for this difference?

Insert 3.8-29-03

The submittal indicates that this insert is included, but it does not show up anyplace in the submittal.



NUREG MARKUP3.8.6Page 3.8-31

SR 3.8.6.1, Insert 3.8-31-01
P.2 Need inputs from EELB.

Page 3.8-33

Table 3.8.6-1, Footnote (a)

Change P.3 references a 1987 version of IEEE-450. This standard has been revised, with the latest issue dated 1995. Is the proposed change consistent with this 1995 version of 450? If not, what changes to the submittal are required?

Table 3.8.6-1, Footnote (b)

Change P. 4 is Not Acceptable. This DOD references the 1995 version of IEEE-450 whereas Change P.3 references the 1987 version of the same document. Only one version is acceptable as a justification.

Assuming the 1995 version of IEEE-450 is used, this proposed change is still not acceptable because it does not accurately reflect Annex A.3. The language of Annex A.3 would allow the requirement for level correction to be omitted provided the temperature corrected specific gravity is within the range specified by the manufacturer. Annex A.3 is not a blanket deletion of level correction. This is not accurately reflected in the proposed change. The submittal should be revised.

Table 3.8.6-1 Footnote (c)

Change P.5 is Not Acceptable for the following reasons:

1. The DOD includes a reference to verbiage in Footnote (b) which is not contained in the footnote.
2. The issue of unrestricted use of float current as a substitute for specific gravity measurements has not been resolved generically.
3. The DOD references IEEE-450, but does not specify a particular revision (i.e., 1987, 1995?), and
4. IEEE-450 (1995) does not indicate that stabilized charging current is an acceptable substitute for all specific gravity measurements when determining the state of charge of a battery. The submittal should be revised, accordingly.



NUREG MARKUP3.8.7Page 3.8-38

LCO 3.8.7

Change P.1 is Not Acceptable. Proposed Table 3.8.7-1 does not reflect NUREG-1433 or CTS requirements regarding electrical distribution subsystems (See CTS LCO 3.8.3.1.a.1.b.4) the submittal should be revised to correct this problem.

LCO 3.8.7, Condition B

Change P.2 is Not Acceptable because (1) DOD P.2 does not appear on the markup of LCO 3.8.7 and its applicability cannot, therefore, be determined, and (2) the narrative provided as DOD P.2 references LCO 3.8.7, Condition B, but the entire discussion addresses something completely different than what is in NUREG-1433.

LCO 3.8.7, Condition D&E

Change P. 3 is acceptable as far as it goes. However, there is not default Condition associated with Condition D and E. Consequently, failure to comply with the Required Actions of either Condition would result in entry into 3.09.3 This should be corrected.

LCO 3.8.7. Condition H

Change P. 4 involves addition of Conditions H and I. Condition H is understandable. However, Condition I doe snot make sense. If a required Unit 1 electrical power distribution subsystem is inoperable AND the Required Actions of Condition H are not met, how is the resulting plant status any different than that addressed in Conditions A or B? IN this same vein, why should the Required Actions of Condition I be different than those in Condition B or B? The proposed change must be considered Not Acceptable until these questions are adequately answered.

Page 3.8-39

SR 3.8.7.1

The narrative of DOD P.7 indicates that the proposed changes are editorial. This doe snot appear to be the case. NUREG-1433 and the CTS both require a voltage check as part of this SR. A voltage check is not the same as "indicated power availability" as proposed by this change, and the change from voltage check to the proposed requirement doe snot appear to be editorial in nature. This part of the submittal should be revised appropriately.

General Comment

The SSES ITS include Condition's A & B which use the term "one or more" with respect to inoperable AC and DC electrical subsystems, respectively. In addition, Condition F is added which addresses "Two or



more ---- loss of function." These Conditions represent a substantial change (less restrictive) from CTS requirements which has not been adequately justified. Absent an adequate justification, consideration should be given to deleting "one or more" from Conditions A & B, and deleting Condition F entirely.



NUREG-MARKUP

3.8.8

Page 3.8-40

LCO 3.8.8, Condition B

Addition of COnditon (Chagne P.6) is acceptable. However, Codntion B does not have a default Condition; i.e., what happens if the Required Actions of Condition B are not met. The submittal should be revised to address this item.

Page 3.8-41

LCO 3.8.8, Conditon A

Change P.5 is confusing. It refernces Insert 3.8-41-01. However, the submittal includes Insert 3.8-28-01 which does not appear to "fit" into LCO 3.8.8. The submittal shouldb e reviewed and the correct insert provided.

SR 3.8.8.1

Change P.4 is acceptable. However, it should be noted that this SR reuquires a "voltage check" whereas SR 3.8.7.1 is proposed requiring only "verification fo power availability." The submittal is not consistent.

NUREG BASES MARKUP

SSES

3.8.1

Page B3.8-1

Background:

Proposed change is from "the" offsite power sources to "two" offsite power sources, but the Bases still lists three power sources.

Page B3.8-1

Background:

What is the reason for deleting the last part of the 1st paragraph on this page? Not the SSES design?

Page B3.8-4

LCO: 2nd Paragraph

The Bases refers to 2C & 2D SATs - is this correct? Should this not be ST 10 and ST 20?

Page B3.8-5

Action A.1, Insert B3.8-5-01 P.2

The proposed change does not include all of the material from the Note in CTS (See also comment on P.2 in NUREG markup comments). Also, note that the Bases can not impose requirements such as that in the last sentence of the Insert. Appropriate changes to both the TS and the Bases should be made.

Action A.2 P.3

The staff interprets this DOD as follows: The SSES design is such that the inoperability of a single offsite ckt. would not result in a ESS bus w/o offsite power because of the automatic transfer to the alternate AC source. If the automatic transfer failed, this would constitute two (2) offsite ckts inoperable even if power was available from the alternate offsite source. Is this staff interpretation correct? If so, this DOD should be revised to reflect this. As worded, the DOD is confusing.

Page B 3.8-9

B3.8 & B.3.2 P.4

The proposed change is not acceptable. See comments re: P.4 in comments to NUREG Markup for LCO 3.8.1)



Page B 3.8-10

Action C.1 P.3

The staff does not understand the part of this DOC which addresses deletion of Action C.1. What allowance in the SSES CTS is retained by deleting Action C.1? The licensee should provide additional explanation for this issue.

Page B3.8-11

Action C.1 P.3

See comment, above.

Page B 3.8-12

Action D.1 and D.2 P.5

See comment re: P.5 in LCO 3.8.1 markup for Condition D. This Bases section will have to reflect resolution of staff comments re: P.5 and changes may be required.

Page B3.8-14

Action F.1 P.6

See comment re: P.6 in comments to LCO 3.8.1, Condition F. Pending resolution of the staff's concerns, some Bases modification may be necessary here.

Page B3.8-15

Insert B3.8-15-01 P.6

The Insert addresses a new Required Action G.1, but DOD P.6 addresses deletion of NUREG-1433 Condition F. The licensee should provide the appropriate DOD for the proposed insert. If DOD P.5 is the appropriate DOD, the see comments re: P.5 for LCO 3.8.1 Condition D in NUREG markup.

Page B3.8-16

SR 3.8.1.1 P.20

SR 3.8.1.7

The DOD does not directly address the proposed change and, consequently, does not adequately address the change. The DOD should be revised to adequately address the proposed change.

NOTE: This change may not be necessary. The licensee should discuss with the staff the possible applicability of all of Note 2 in SR 3.8.1.2 to SR 3.8.1.7.

Page B3.8-18

Insert B3.8-18-01 P.8

The proposed Bases addition is acceptable. However, the Bases and Note 6 to SR 3.8.1.3 do not entirely agree. The Bases addresses one unit in shutdown with SR 3.8.2.1 precluding performance of the SR on that Unit. The Note, however, provides an unrestricted exception which is not acceptable. The submittal should be revised so that note and the Bases are in agreement.

Insert B3.8-18-02 P.18

The Bases addition is Note Acceptable because the NUREG change and associated CTS change are not acceptable. See comments for Insert 3.8-7-03 in NUREG Markup.

Page B3.8-20

SR 3.8.1.8 P.12

See comments re: P.12 in NUREG Markup comments for SR 3.8.1.8.

Page B3.8-21

SR 3.8.1.9

No justification is provided in support of deleting the Bases discussion, for Note 1. A justification should be provided.

Page B3.8-23

SR 3.8.1.10 P.12

Deletion of the Note precluding conduct of this SR in Modes 1 & 2 is not acceptable. See comment for SR 3.8.1.8 in NUREG Markup.

Page B3.8-24

SR 3.8.1.11 P.14

The DOD does not address deletion of the second paragraph in the Bases discussion for SR 3.8.1.11 on this page. DOD P.14 addressed changes to SR 3.8.1.18. Also, SR 3.8.1.11 still contains the Bases material proposed for deletion. This inconsistency and the absence of an appropriate DOD should be addressed.

SR 3.8.1.11 P.12

Deletion of the Mode constraint for conduct of this SR is not acceptable. See comment for SR 3.8.1.8 in NUREG Markup.

Insert B3.8-24-01 P.11

P.11 is still being reviewed by the staff. See comment re: P.11 for SR 3.8.1.11 in NUREG Markup for details.



Page B3.8-25

Insert B3.8-25-01 P.11

P.11 is still being reviewed by the staff. See comments re: P.11 for SR 3.8.1.11 in NUREG Markup for details.

Page B3.8-26

SR 3.8.1.12 P.12

Deletion of the Mode constraint is not acceptable. See comment for SR 3.8.1.8 in NUREG Markup.

SR 3.8.1.13 P.12

Deletion of the Mode constraint is not acceptable. See comment for SR 3.8.1.8 in NUREG Markup.

Insert B3.8-26-01 P.12

The DOD is not applicable to the proposed insert. It would appear that the appropriate DOD is P.11. If this is correct, then P.11 is still being reviewed by the staff. See comments for SR 3.8.1.11 in NUREG Markup for details.

Page B3.8-27

SR 3.8.1.14 P.16

Change P.16 makes a statement but does not include any quantifying data; i.e., what is the field excitation current at unity power factor and 400 Kw as opposed to the excitation current at maximum post accident loading. This information should be provided in support of the proposed change.

Page B3.8-27

SR 3.8.1.14 P.12

Deletion of the Mode constraint is not acceptable. See comment for SR 3.8.1.8 in NUREG Markup.

SR 3.8.15 P.12

Insert B3.8-28-02

The DOD that is indicated as the justification for the proposed change does not address the change. The proper justification should be provided.

Page B3.8-29

SR 3.8.1.16 P.19

Insert B3.8-29-01

The DOD indicates the PG1.9, Rev. 1.9, Rev. 3 endorses a 24 month refueling cycle. The staff is not aware of anything in the RG of this nature. This DOD is, therefore, not acceptable. Also, the proposed change from 18 months to 24 month refueling cycle is beyond the scope of this conversion effort.



SR 3.8.1.16

Inset B 3.8-29-02 P.17

The DOD indicates the PG 1.9, Rev. 3 endorses a 24 month refueling cycle. The staff is not aware of anything in the RG of this nature. This DOD is, therefore, not acceptable. Also, the proposed change from 18 months to 24 month refueling cycle is beyond the scope of this conversion effort.

SR 3.8.1.16 P.17

Inset B 3.8-29-02

The staff does not understand the licensee's proposed schedule for testing DG E in this SR. Assuming DG E is tested on Bus 1A (substituted for DG A) at time zero (0), how long will it be before DG E is again tested on Bus 1A? In the proposed Table, what is the purpose of showing DG E substituted for itself in two places? The licensee should provide clarification.

Also, the Bases discussion of Note 2 for this SR does not appear to accurately reflect the Note, or the Note is not consistent with the Bases discussion. The licensee should review the Note on the Bases in light of staff comments on both, and make any necessary changes to resolve staff concerns.

Page B 3.8-30

SR 3.8.1.17 P.19

See comments re: P.19 to Bases for SR 3.8.1.16, above.

SR 3.8.1.17 P.12

Inset B 3.8-30-01

Deletion of the Mode constraint is Not Acceptable. See comment for SR 3.8.1.8 in NUREG Markup.

DOD P.12 does not address addition of the Insert. The licensee should provide a reference to the current justification. If the correct DOD is P. 17, see comments re: P.17 for the Bases for SR 3.8.1.16 (including the issue of the Bases discussion and the proposed Note not being consistent).

SR 3.8.1.18 P.14

Inset B3.8-30-02

The proposed Bases addition includes a statement that failure of an offsite timer may result in both offsite sources being inoperable. Should this not read "will" be inoperable?

SR 3.8.1.18 P.19

See comment to Bases for SR 3.8.1.16 re: P.19

SR 3.8.1.8 P.12

See comment to Sr 3.8.1.8 in NUREG Markup re: P.12

Page B3.8-31

SR 3.8.1.19 P.11

Insert B3.8-31-01

No justification has been provided for deleting the Bases discussion of the NUREG Mode constraint. The appropriate discussion should be provided.

Page B3.8-32

SR 3.8.120 P.19

See comments to Bases for SR 3.8.1.16 re: P.19

Insert B3.8-32-01 P.1

The proposed addition of SR 3.8.1.21 (Unit 2, only) appears to be acceptable. However, the Bases discussion of the proposed Note to this new SR does not appear to be acceptable. This is because the proposed Note appears to be a blanket exception to the definition of OPERABILITY with respect to SRs. Discussion of this issue with the licensee is required.

Page B3.8-33

Insert B3.8-33-01 P.18

No insert was provided in the submittal package provided to the staff for review.



100-100000

BASES MARKUP

3.8.2

Page B3.8-37

LCO 3.8.2 P.5

Insert B3.8-37-01

The description of offsite circuits doe snot address transformers 101, 201, 111, and 211 or what Condition applies if one of these transformers is inoperable. This is not part of a larger issue regarding what constitutes an offsite source, and when an offsite source is inoperable.

Page B3.8-38

Action A.1 P.2

Insert B. 38-38-02

The change associated with P.3 is not acceptable because the associated change to the LCO is not acceptable. See comment for LCO 3.8.2, Condition A in NUREG Markup; re: P.3

Action A. 1 P.3

Insert B3.8-38-02

The change associated with P.3 is not acceptable because the associated change to the LCO is not acceptable. See comment for LCO 3.8.2, Condition A in NUREG Markup; re: P.3

Action A. 1 P.3

Insert B3.8-38-04

The proposed change is not acceptable for two reasons. First, the staff does not understand what the wording of the insert B3.8-38-04 is supposed to say, and second, the wording of the insert does not have corresponding language inthe LCO. The proposed insert appears to be a permissive of some sort that is inappropriate for inclusion inthe Bases.

Action A.2 P.3

Insert B3.8-38-03

The proposed insert is Not Acceptable. See Comment re: Condition A and P.3 in LCO 3.8.2 NUREG Markup.

Page B3.8-40

SR 3.8.2.1 P.1

Insert B3.8-40-01

The staff does not understand the last part of this insert. See Question in SR 3.8.2.1 comment NUREG Markup.



BASES MARKUP

3.8.3

Page B3.8-41

Background P.4

The proposed change is not correct. There are no SRs addressed in the Diesel Fuel Oil Testing program. All fuel oil SRs are included in LCO 3.8.1 or LCO 3.8.3. This submittal should be corrected.

Page B3.8-45

Action E.1 P.2

The proposed addition to the Bases is not acceptable because it constitutes a permissive that is not reflected in the TS. The staff understands the purpose of the proposed addition, but the wording is inappropriate for inclusion in the Bases. As an alternative, consider that following a successful start, the DG is running, and there is no longer a requirement for starting air. Consequently, with the DG running, receiver pressure less than the LCO limit has no impact.

NOTE: LCO Applicability is when DGs are required to be OPERABLE; i.e., capable of performing their intended function. For the air start system, once the DG has started, it is OPERATING, and the requirements for the air start system are no longer applicable. This same concept can be applied to the fuel oil and lube oil systems.

Page B3.8-46

SR 3.8.3.3 P.4

The proposed Bases change is not acceptable. The purpose of the Bases is to explain the TS, and the SSES proposed Bases does not do this adequately. The purpose of moving details such as ASTM Std. #'s a Revision date to the Bases was to allow some flexibility with respect to changes while ensuring the purpose of the program was met. Placing this material in the TRM does not provide the same degree of control as the Bases, and is not the place for explanation of TS.

Page B3.8-47

SR 3.8.3.3 P.4

The proposed change is not acceptable. See comment re: P.4, above.

Page B3.8-48

SR 3.8.3.4

What constitutes a start cycle for the DGs at SSES? The NUREG Bases with respect to a start cycle is deleted, but the licensee has not provided a reason for the deletion, or provided any unit specific details to replace it. Appropriate information.



SR 3.8.3.6 P.3

See comment re: P.3 in NUREG Markup for SR 3.8.3.6.

BASES MARKUP

3.8.4

Page B3.8-51

Background P.7

What are the design basis requirements for the battery chargers at SSES.

Page B3.8-54

C.1, D.1 P.2, P.3

See comment re: lack of a default statement for proposed new Condition C and Condition D in comments to NUREG Markup.

SR 3.8.4.1 P.4

Insert B3.8-54-03

See comments re: moving the 14 days from the frequency column to the Note in CTS Markup. Corresponding Bases changes will be required.

SR 3.8.4.2

The proposed Bases changes result in a Bases discussion that does not read well, and may be incorrect. The licensee should revise this Bases discussion to more completely address the thought(s) that prompted the change.

SR 3.8.4.2 P.5

Insert B3.8-54-04

See comments re: Change M.3 on Page 3/48-11 in CTS Markup. Proposed SR 3.8.4.2 and SR 3.8.4.5 appear to be in conflict with each other. The bases will have to be revised to reflect any changes made to resolve this comment.

Page B3.8-56

SR 3.8.4.6 P.9

Insert B3.8-56

The proposed addition to the Bases is acceptable, albeit unnecessary. However, the associated change to the NUREG SR is not acceptable. See comment re: SR 3.8.4.6 & P.9 in NUREG Markup.

SR 3.8.4.6 P.8

Deletion of the Mode constraint is not acceptable.

Page B3.8-57

SR 3.8.4.7 P.8

Deletion of the Mode constraint is not acceptable.

NOTE: A modified performance discharge test may be substituted for a service test at any time. The licensee might want to revise this section of the Bases.

Bases Markup
3.8.5

Pg. B.3.8-61

~~LEO~~ Actions (P2) The Bases addition regarding LCO 3.0.3
Insert B3.8-61-02 ... seems to be incomplete. The licensee should
consider adding to the material so that the
whole thought is captured.

BASES MARKUP

3.8.5

Page 3.8-61

Actions P.2

Insert B3.8-61-02

The Bases addition regarding LCO 3.0.3 seems to be incomplete. The licensee should consider adding the material so that the whole thought is captured.

BASES MARKUP

3.8.6

Page B3.8-66

SR 3.8.6.1 P.5
Need EELB input.

Page B3.8-68

Table 3.8.6-1 P.4
The proposed deletion of level correction is not acceptable. See comments re: P.4 in NUREG Markup for Table 3.8.6-1.

Page B3.8-69

Table 3.8.6-1 P.4
The proposed deletion of Bases material regarding level correction is not acceptable. See comments re: P.4 in NUREG Markup for Table 3.8.6-1.

Page B3.8-70

Table 3.8.6-1 P.6
Deletion of the Bases material is not acceptable because deletion of the corresponding TS requirements is not acceptable. See comments re: Changes to Footnote (c) in NUREG Markup for Table 3.8.6-1.



BASES MARKUP

3.8.7

Page B3.8-81

Action A. P.7

The proposed addition to the Bases is described as an editorial change necessary to reflect the SSE design. The staff does not agree that this is an editorial change. To the contrary, addition of the proposed material, in combination with the Bases material proposed for deletion, constitutes a substantially less restrictive requirement than CTS which has not been justified. The licensee should review this issue (including comments on the CTS markup—same subject) and provide a detailed justification of why the less restrictive change is applicable to and appropriate for inclusion in the SSE'S ITS.

Page B3.8-85

Action B.1 P.7

See comment for Action A.1 P.7, above.

NOTE: The 2nd paragraph of this Bases discussion is not consistent with the proposed change in the 1st paragraph. As proposed, this Action would allow more than one DC bus to be inoperable. That means that more than one division could be without adequate DC power, but the Bases discussion (from 2nd paragraph on) only discusses a SINGLE DC bus inoperability. This inconsistency should also be addressed if the proposed change to the 1st paragraph can be justified.

This Note is also applicable to the latter part of the Bases discussion for Action A.1.

Page B3.8-86

Action B.1

Insert B3.8-86-01

The insert states that Condition D is modified by a Note. Should this not read Condition B is modified?

BASES MARKUP

3.8.8

Page B3.8-91

Actions P.3

Insert B.38-91-01

The proposed Bases addition is acceptable. However, the Bases discussion should be expanded somewhat to more completely address why LCO 3.0.3 should not be applicable.

Actions P.5

Insert B3.8-91-01

The proposed Bases addition only addresses Unit 2. Where is the applicable language for Unit 1? The licensee should provide this information.

