2.2. Variations

Susquehanna is proposing the following variations from the TS changes described in the TSTF-542 or the applicable parts of the NRC staff's safety evaluation. These variations do not affect the applicability of TSTF-542 or the NRC staff's safety evaluation to the proposed license amendment.

2.2.1. The SSES TSs utilize different numbering and titles than the Standard Technical Specifications (STS) on which TSTF-542 was based. These differences are administrative and do not affect the applicability of TSTF-542 to the SSES TSs.

| TSTF-542 TS Numbering and Titles | | SSES TS Numbering and Titles | |
|---|---|---|---|
| TS 3.3.7.1 | [ Main Control Room Environmental Control (MCREC) ] System Instrumentation | TS 3.3.7.1 | Control Room Emergency Outside Air Supply (CREOAS) System Instrumentation |
| TS 3.7.4 | [ Main Control Room Environmental Control (MCREC) ] System | TS 3.7.3 | Control Room Emergency Outside Air Supply (CREOAS) System |
| TS 3.7.5 | [ Control Room Air Conditioning (AC) ] System | TS 3.7.4 | Control Room Floor Cooling System |
| TS 3.8.8 | Inverters - Shutdown | None | None |
| TS 3.8.10 | Distribution Systems - Shutdown | TS 3.8.8 | Distribution Systems - Shutdown |

2.2.2. The Note on LCO 3.5.2 regarding realignment to the Low Pressure Injection mode is currently located in SR 3.5.2.4 but is proposed to be relocated to the LCO. This has no effect on the adoption of TSTF-542 and increases consistency between the Susquehanna TS and the STS.

2.2.3. The SSES TSs contain a Surveillance Frequency Control Program. Therefore, the Surveillance Requirement (SR) Frequencies for Specifications 3.3.5.2 and 3.5.2 are "In accordance with the Surveillance Frequency Control Program."

2.2.4. STS Table 3.3.5.1-1, Function 1.d, "Core Spray Pump Discharge Flow – Low Bypass)," and Function 2.g, "Low Pressure Coolant Injection Pump- Discharge Flow – Low (Bypass)," are not included in the Susquehanna TSs. These functions are not required to ensure manual initiation of CS and LPCI and are therefore not included in TS 3.3.5.2, "Reactor Pressure Vessel (RPV) Water Inventory Control," Table 3.3.5.2-1.

2.2.5. Susquehanna Table 3.3.5.1-1 includes Functions 1.c and 2.c, "Reactor Steam Dome Pressure – Low (initiation) that are not included in the STS. These functions are not required to ensure manual initiation of CS and LPCI and are therefore not included in the new Table 3.3.5.2-1.

2.2.6. The SSES TSs do not include STS SR 3.3.5.1.7 (Verify the ECCS RESPONSE TIME is within limits); however, similar requirements are included in SSES SR 3.5.1.13 and SR 3.5.2.7 (Verify the ECCS RESPONSE TIME for each ECCS injection/spray subsystem is within limit). As described in the discussion in Section 3.3.3 of the TSTF-542 justification, since a draining event is not an analyzed accident, there are no accident analysis assumptions with respect to response time. In addition, response times are insignificant compared to drain down times (seconds vs. hours). On this basis, the existing SR 3.5.2.7 is being deleted.

2.2.7. A note was added to SR 3.3.5.2.2 to state, "A test of all required contacts does not have to be performed". This note is included in the existing channel functional test surveillance in TS 3.3.5.1 (SR 3.3.5.1.2) and 3.3.6.1 (SR 3.3.6.1.2) for the affected functions included in TS 3.3.5.2. The Bases for these SRs state that the exception is necessary because the design of instrumentation does not facilitate functional testing of all required contacts of the relay which input into the combinational logic and that performance of such a test could result in a plant transient or place the plant in an undue risk situation. Therefore, for this SR, the CHANNEL FUNCTIONAL TEST verifies acceptable response by verifying the change of state of the relay which inputs into the combinational logic. The required contacts not tested during the CHANNEL FUNCTIONAL TEST are tested under the LOGIC SYSTEM FUNCTIONAL TEST, SR 3.3.5.1.5 (or 3.3.6.1.5). This is acceptable because operating experience shows that the contacts not tested during the CHANNEL FUNCTIONAL TEST normally pass the LOGIC SYSTEM FUNCTIONAL TEST, and the testing methodology minimizes the risk of unplanned transients. Based on adding this note to SR 3.3.5.2.2, SR 3.3.5.2.3 is made applicable to the functions to which SR 3.3.5.2.2 applies to maintain consistency. The Bases for SR 3.3.5.2.2 is also revised to reflect this basis.

2.2.8. The current SSES TSs do not include Channel Checks for Table 3.3.5.1-1, Functions 1.d and 2.d (Reactor Steam Dome Pressure – Low (Injection Permissive)); therefore, no Channel Checks Surveillance Requirement was added for these functions in the new Table 3.3.5.2-1 (Functions 1.a and 2.a).

2.2.9. TSTF-542 inadvertently omitted the corresponding TS Bases markup for the deletion of TS 3.3.6.1 Required Action J.2 regarding actions to isolate RHR shutdown cooling. The SSES TS Bases are made consistent with the TS change.

2.2.10. Susquehanna Table 3.3.6.1-1, "Primary Containment Isolation Instrumentation", includes Function 6.c, "Manual Initiation", that is not included in the STS. Modes 4 and 5 applicability is being removed from this function and the footnote is correspondingly being removed from the required channels per trip system column. The shutdown cooling system can be isolated without the primary containment isolation instrumentation function, and this is consistent with the basis for eliminating the applicability during OPDRVs from the Manual Initiation function associated with Secondary Containment isolation as described in Section 3.4.1.3 of the TSTF-542 justification

2.2.11. There are some differences between the SSES TSs and the STS related to the high radiation functions in Table 3.3.6.2-1; however, these functions serve the same purpose as the functions described in the TSTF (i.e., isolating secondary containment on elevated radiation). The basis provided in TSTF-542 for eliminating the applicability of these functions during OPDRVs applies to the SSES functions.

2.2.12. There are some differences between the SSES TSs and the STS related to the high radiation functions in Table 3.3.7.1-1, "Control Room Emergency Outside Air Supply System Instrumentation"; however, these functions serve the same purpose as the functions described in the TSTF (i.e., automatic initiation of the CREOAS system on elevated radiation). The basis provided in TSTF-542 for eliminating the applicability of these functions during OPDRVs applies to the SSES functions.

2.2.13. Susquehanna Table 3.3.7.1-1, "Control Room Emergency Outside Air Supply System Instrumentation", includes Function 9, "Manual Initiation", that is not included in the STS. Function 9 is applicable during OPDRVs. The applicability during OPDRVs is eliminated. The CREOAS system can be initiated without the associated instrumentation function; this is consistent with the basis for eliminating the applicability during OPDRVs from the Manual Initiation function associated with Secondary Containment isolation as described in Section 3.4.1.3 of the TSTF-542 justification.

2.2.14. SSES TS 3.6.1.3, PCIVs, is currently applicable in Modes 1, 2, and 3, and when associated instrumentation is required to be OPERABLE per LCO 3.3.6.1, "Primary Containment Isolation Instrumentation." However, TSTF-542 deletes from Table 3.3.6.1-1 the Modes 4 and 5 requirement for shutdown cooling system isolation. As a result, TS 3.6.1.3 will no longer require any PCIVs to be operable in Modes 4 or 5. Therefore, Susquehanna proposes to revise the Applicability to Modes 1, 2, and 3 and delete Condition H, which is applicable in Modes 4 and 5. In addition, the unnecessary reference to Modes 1, 2, or 3 in Condition G is deleted since LCO 3.6.1.3 is applicable only in Modes 1, 2 and 3. These changes are administrative in nature and are justified on the basis that TSTF-542 removed the Mode 4 and 5 Applicability from LCO 3.6.1.3.

2.3. Administrative Update

TS 3.6.4.1, Condition A and TS 3.6.4.3, Condition D for both Unit 1 and 2 include a one-time completion time that expired on December 31, 2005. The note states, "48 hours for a one-time outage for replacement of the Reactor Building Recirculating Fan Damper Motors, to be completed by December 31, 2005." Susquehanna proposes to delete these notes that no longer apply. This change is administrative in nature.