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SUBJECT: Requests amend to TS,revising "Rev A," including changes in Vol 7.Proposed rev does not change conclusion of NHSC or Environ Assessment provided in Rev A.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

July 9, 1996
GO2-96-132

Docket No. 50-397

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

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21**
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

References:

1) Letter GO2-95-265, dated December 8, 1995, JV Parrish (SS) to NRC, "Request for Amendment to Technical Specifications"

2) Letter GI2-96-125, dated May 8, 1996, JW Clifford (NRC) to JV Parrish (SS), "Issuance of Amendment for the Washington Public Power Supply System Nuclear Project No. 2 (TAC No. M94573)"

3) Letter GI2-96-113, dated April 30, 1996, JW Clifford (NRC) to JV Parrish (SS), "Conversion to Improved Technical Specifications (ITS) - Washington Public Power Supply System Nuclear Project No. 2 (WNP-2) (TAC No. M94226)"

4) Letter GO2-95-076, dated April 25, 1995, JV Parrish (SS) to NRC, "Request for Amendment to Technical Specification 3/4.3.2, 'Isolation Actuation Instrumentation'"

5) Letter GO2-96-080, dated April 22, 1996, JV Parrish (SS) to NRC, "Request for Amendment to Technical Specifications Section 6.0 Administrative Controls - Supplemental Information"

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In Reference 1, the Supply System proposed an overall conversion of the WNP-2 current Technical Specifications (CTS) to Improved Technical Specifications (ITS), based upon NUREG-1434, Revision 1, "Standard Technical Specifications, General Electric Plants, BWR/6," (STS). This letter proposes a revision to the amendment request "Revision A," originally submitted in Reference 1. The request for amendment to the WNP-2 Technical Specifications and Operating License is submitted in accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101. Volume 7 of the amendment request contains the No Significant Hazards Considerations. Although Revision B includes changes in Volume 7, the Supply System has determined that the proposed revision does not change the conclusion of the No Significant Hazards Considerations or the Environmental Assessment provided in Revision A.

Revision B includes numerous changes to Revision A. Responses to many of the staff review comments have been incorporated. Enclosure 1 lists these changes. Enclosure 2 contains page insert and removal instructions to facilitate updating Revision A. Revision B is Attachment 1 to this letter.

Reference 1 proposed increasing the surveillance frequency interval from 18 months to 24 months for several surveillance requirements. In response to the staff's request for additional information, Attachment 2 describes the surveillance interval extension evaluation.

Reference 1 identified three open items. The first concerned Supply System License Condition 2.C(16), Attachment 2, Item 3(b) regarding post accident monitoring neutron flux instrumentation and a planned request to amend the License Condition. The request has not yet been submitted for staff review. The License Condition will be maintained until the change is approved by the staff. The Supply System does not plan to incorporate the neutron flux monitoring instrumentation into the ITS submittal.

The second issue involved a planned submittal of the methodology to be used to develop the reactor pressure vessel pressure temperature limits. Revision A referenced the proposed Pressure Temperature Limits Report (PTLR). The methodology has not yet been submitted. ITS Revision C will therefore include the limits in the Technical Specifications and delete references to the PTLR.

A third change to Revision A would incorporate Cycle 12 specific changes. Changes to the current Technical Specifications for Cycle 12 have been approved by the staff and will be incorporated into ITS Revision C.

Reference 2 approved the use of Option B to the Appendix J testing requirements. This change has been incorporated into ITS Revision B.

In Revision A, the Supply System proposed relocating information in the current Technical Specifications to plant controlled documents, with changes to the documents controlled in accordance with 10 CFR 50.59. Revision C will identify the specific licensee controlled documents. At the request of the staff, the relocated items and the proposed location are listed in Enclosure 3.

The Supply System also proposed relocating information to plant procedures and committed that changes to the procedures would be controlled in accordance with 10 CFR 50.59. In discussions with the staff, Mr. T.V. Wambach expressed that changes to plant procedures are not necessarily subject to the requirements of 10 CFR 50.59. Enclosure 4 provides the FSAR reference for those Technical Specification requirements to be relocated to procedures. This provides assurance that 10 CFR 50.59 will control future changes to the procedures. Specific requirements relocated to plant procedures will be tracked as regulatory commitments that can only be changed in accordance with 10 CFR 50.59.

Reference 1 also indicates requirements that are to be relocated to the WNP-2 Licensee Controlled Specifications (LCS) Manual. Chapter 1 of the LCS contains the Requirements for Operability (RFO), similar to the Limiting Conditions for Operations (LCO) in the Technical Specifications. Chapter 1 also contains equipment requirements, appropriate compensatory actions, and test requirements. The staff has indicated that prior to approving the relocation of requirements to the LCS from the CTS, the LCS must be incorporated into the FSAR. The Supply System will incorporate Chapter 1 of the LCS into the FSAR, by reference. Necessary changes will be made in Revision C to clarify this commitment.

In Reference 3, the staff acknowledged receipt of the change request and indicated that 41 issues were changes that could not be justified on the basis of the improved STS content. The Supply System does not agree that all of the 41 open items are beyond the scope of the conversion process. However, the staff has indicated that most of the 41 items will be reviewed by the staff in support of the ITS conversion. The Supply System appreciates the staff's consideration of these issues. Therefore, the request for the extension of allowed outage times (AOTs) discussed in Items 13, 26, 28 and part of Item 20 will be withdrawn from the ITS conversion in Revision C.

There are two pending license amendment requests under staff review. In Reference 4, the Supply System requested the addition of a containment isolation function to the WNP-2 Technical Specifications. Reference 1 categorized the change as a more restrictive requirement. The requirement will be maintained in the LCS until the amendment approval is received. If the staff approves the ITS amendment prior to approving the referenced request, the appropriate ITS pages will be submitted as a supplement to Reference 4. Reference 5 requested a change to Section 6.0 of the current Technical Specifications. Changes not incorporated into Reference 1 will be added to ITS Revision C.

In summary, Revision B incorporates changes identified by the staff and the Supply System. Not all review comments have been resolved. Revision C will incorporate additional changes generated from the comment resolution. Revision C will also:

Remove reference to the PTLR and add the limits to ITS;

Include changes necessary to support addition of the adjustable speed drives and removal of the flow control valves from the reactor recirculation system;

Withdraw the request to extend various AOTs for ECCS and DG systems (Items 13, 20, 26, and 28);

Include additional Technical Specification Administration Section changes (Reference 5);

Revise the DOCs to indicate specific licensee controlled documents for relocated information.

A meeting was held with the staff on June 27 to discuss the ITS submittal. Revision B was completed prior to the meeting and does not address the agreements reached during the meeting. Revision C completion schedule will be established following resolution of the issues discussed at the meeting. The Supply System understands that the completion of the SER for the WNP-2 ITS submittal is tied to the resolution of all open issues and will expedite the submittal of any ITS revisions needed to support the staff review schedule.

This Technical Specification amendment request has been approved by the Plant Operations Committee and the Corporate Nuclear Safety Review Board. In accordance with 10 CFR 50.91, the State of Washington has also been provided a copy of this letter.

Should you have any questions or desire additional information regarding this matter, please call me or LC Fernandez at (509) 377-4147.

Respectfully,

P.R. Bemis
Vice President, Nuclear Operations
Mail Drop PE23

MGE

Attachments
1. Revision B of the ITS submittal
2. Evaluation of the 24 month surveillance interval

Enclosures
1. Revision B summary of changes
2. Page insert and remove instructions
3. Relocated items and proposed locations
4. FSAR reference for relocated items

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, WCFO
NS Reynolds - Winston & Strawn (w/o)
NRC Sr. Resident Inspector - 927N
TG Colburn - NRR
FS Adair - EFSEC
DL Williams - BPA/399 (w/o)

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Amendment to Technical Specifications

I, J. H. SWAILES, being duly sworn, subscribe to and say that I am the Engineering General Manager for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

DATE July 9, 1996

J. H. Swailes
Engineering General Manager

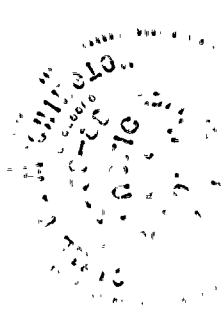
On this date personally appeared before me J. H. SWAILES, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 9 day of July 1996.

Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick WA

My Commission Expires 4/28/98



REVISION B SUMMARY OF CHANGES

This enclosure was prepared to provide a brief summary of the changes in Revision B. The original Technical Specification amendment request was submitted to the NRC on December 8, 1995. The amendment request proposed the overall conversion of the current Washington Nuclear Plant Unit 2 (WNP-2) Technical Specifications, as described in NUREG-1433, Revision 1 and NUREG-1434, Revision 1, "Standard Technical Specifications, General Electric Plants, BWR/4 and BWR/6," respectively.

Revision B to this amendment request results from the incorporation of NRC review comments, as well as certain generic Technical Specification Task Force changes and editorial changes. The order in which summary of the changes are listed is of no significance. Replacement pages have been provided for each of the pages affected by Revision B changes. Page insert and removal instructions have also been provided to facilitate updating the amendment request to include Revision B.

SUMMARY OF CHANGES

1. Application of Selection Criteria, Attachment page 8

   Revised the Basis for inclusion has been provided for CTS 3/4.4.1.4, Idle Recirculation Loop Startup. This basis is consistent with the Bases for proposed LCO 3.4.12.

2. Application of Selection Criteria, Appendix A, pages 1 and 2 of 28

   Updated LCO Statements have been provided to reflect the LCO Statements modified by a recent amendment.

3. Specification 3.3.8.2, RPS Electric Power Monitoring, LCO 3.3.8.2 and Conditions A and B, pages 3.3-71 and B 3.3-214

   In MODES 4 and 5, the RPS Electric Power Monitoring assemblies are required to support the instrumentation that provides an isolation signal to the RHR SDC suction isolation valves. The instrumentation is listed in proposed LCO 3.3.6.1, and only one of the two trip systems is required when RHR SDC System integrity is maintained (Note d to Table 3.3.6.1-1). This LCO requires two RPS Electric Power Monitoring assemblies to be OPERABLE for each inservice RPS power supply. However, only one RPS power supply is needed to support the required instrumentation, provided the RHR SDC System integrity is maintained. Currently, this LCO requires RPS Electric Power Monitoring assemblies to be OPERABLE on an inservice RPS power supply (which is normally maintained inservice at all times), even when no equipment is required to be OPERABLE. Therefore, the words "that support equipment required to be OPERABLE" have been added. This will allow the RPS Electric Power Monitoring assemblies on one of the two RPS power supplies to be inoperable when no required equipment is being

REVISION B SUMMARY OF CHANGES

3. (continued)

powered from the associated RPS power supply. In addition, the word "required" has been added to Conditions A and B for consistency with the Writer's Guide, since, based on the above described change, all RPS Electric Power Monitoring assemblies may not be required OPERABLE at all times.

Corresponding changes have also been made to the CTS markup for Specification 3.3.8.2, page 1 of 1, to the Discussion of Changes L.1 for ITS 3.3.8.2 (page 2), to the NUREG-1434 ITS markup, page 3.3-83, to the Justification for Deviations to Section 3.3, comment number 43 (page 7), and the NUREG-1434 Bases markup, page B 3.3-241.

4. Specification 3.3.8.2, RPS Electric Power Monitoring, Applicability and ACTIONS C and D, pages 3.3-71, 3.3-72, B 3.3-215, B 3.3-217, and B 3.3-218, and Specification 3.10.4, Single Control Rod Withdrawal—Cold Shutdown, LCO 3.10.4.c, pages 3.10-9 and B 3.10-16

The MODE 4 and 5 Applicability of proposed LCO 3.3.8.2, for control rod withdrawal, is revised to delete MODE 4, consistent with the Applicability of RPS Functions in proposed LCO 3.3.1.1. In MODE 4, a control rod may be withdrawn from a core cell containing one or more fuel assemblies in accordance with proposed LCO 3.10.4. Therefore, LCO 3.10.4 includes OPERABILITY requirements for RPS Functions and control rods (LCO 3.9.5). As a result, LCO 3.10.4 has been modified to also include requirements for the RPS Electric Power Monitoring assemblies to be OPERABLE when the RPS Functions and control rods are required to be OPERABLE. Commensurate changes to the ACTIONS of LCO 3.3.8.2 have also been made for consistency.

The current ACTION D has been split into two separate ACTIONS, one for when the RHR SDC suction isolation valves are open and the other for when a control rod is withdrawn. This provides separate and discrete ACTIONS for the two separate Applicabilities (MODE 4 and 5 with both RHR SDC suction isolation valves open and MODE 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies). This wording is also consistent with a change requested by the NRC reviewer in the comment to section 3.3, comment 97.

Corresponding changes have also been made to the CTS markup for Specification 3.3.8.2, page 1 of 1, to the Discussion of Changes M.1 for ITS 3.3.8.2 (page 1), to the Discussion of Changes L.2 for ITS 3.10.4 (pages 3 and 4), to the NUREG-1434 ITS markup, pages 3.3-83 and 3.3-84, to the Justification for Deviations to Section 3.3, comment number 44 (page 7), to the NUREG-1434 ITS markup, page 3.10-9, to the Justification for Deviations to Section 3.10, comment number 9 (page 1), and the NUREG-1434 Bases markup, pages B 3.3-242, B 3.3-244, B 3.3-245, and B 3.10-18.

REVISION B SUMMARY OF CHANGES

5. Specification 3.3.6.1, Primary Containment Isolation Instrumentation, Table 3.3.6.1-1, Function 1.d, page 3.3-55

   The Allowable Value units for this Function has been changed from inches mercury gauge absolute pressure to inches mercury gauge vacuum. The actual Allowable Value has not changed from the previous submittal, however, the change has been appropriately classified from a less restrictive change to a more restrictive change.

   Corresponding changes have also been made to the CTS markup for Specification 3.3.6.1, page 7 of 12, to the Discussion of Changes M.6 for ITS 3.3.6.1 (page 5), and to the NUREG-1434 ITS markup, page 3.3-56.

6. Specification 3.1.5, Control Rod Scram Accumulators, Required Action C.1, page 3.1-19

   The Required Action has been modified to be consistent with the words of Required Action C.2. It is not necessary to state the control rod is associated with the inoperable accumulator, since Condition C states it is for an inoperable accumulator. The proposed words are also consistent with Required Action C.2.

   Corresponding changes have also been made to the NUREG-1434 ITS markup, page 3.1-17.

7. Specification 5.7, High Radiation Area, pages 5.0-23, 5.0-24, 5.0-25, and 5.0-26

   The Specification has been modified for consistency with the most recent NEI guidelines concerning the draft NRC Generic Letter. The changes are essentially clarifications or editorial in nature.

   Corresponding changes have also been made to the NUREG-1434 ITS markup, pages 5.0-24a, 5.0-24b, 5.0-25a, and 5.0-25b.

8. Specification 2.2, Safety Limits Violations, pages 2.0-1, 2.0-2, B 2.0-5, B 2.0-6, B 2.0-8, B 2.0-9, and B 2.0-10

   The Specification has been modified for consistency with Technical Specification Task Force change number 5 (TSTF-05). The proposed change deletes requirements from the Technical Specifications that are duplicative of or contained in other regulations (10 CFR 50.36).

REVISION B SUMMARY OF CHANGES

8. (continued)

Corresponding changes have also been made to the CTS markup for Chapter 2.0, pages 1 of 6, 2 of 6, 3 of 6, 4 of 6, 5 of 6, and 6 of 6, to the Discussion of Changes A.2, M.3, M.4, LA.1, and LA.2 to ITS Chapter 2.0 (pages 1 and 2), to the CTS markup for current Specification 6.7 (in Chapter 5.0), page 1 of 1, to the Discussion of Changes A.1 and LA.1 to CTS 6.7 (page 1), to the NUREG-1434 ITS markup, pages 2.0-1 and 2.0-2, to the Justification for Deviations to Chapter 2.0, comment number 2 (page 1), to the NUREG-1434 Bases markup, pages B 2.0-6, B 2.0-7, B 2.0-9, B 2.0-10, and B 2.0-11, and to the Justification for Deviations to Bases Chapter 2.0, comment number 8 (page 1).

9. Specification 5.5.9, Diesel Fuel Oil Testing Program, page 5.0-15

An allowance for the applicability of the provisions of SR 3.0.2 and SR 3.0.3 has been added to the Diesel Fuel Oil Testing Program, consistent with the current licensing basis. This program is currently in the surveillances of CTS 3/4.8.1.1. As such, the provisions of CTS 4.0.2 (proposed SR 3.0.2) and CTS 4.0.3 (proposed SR 3.0.3) are already applicable. This change maintains the current provisions.

Corresponding changes have also been made to the CTS markup for Specification 5.5, page 17 of 17, to the Discussion of Changes A.11 to ITS 5.5 (page 2), and to the NUREG-1434 ITS markup, page 5.0-15.

10. Bases 3.3.8.1, LOP Instrumentation, page B 3.3-210

A Bases discussion has been provided for Required Actions B.2.1 and B.2.2, which were added in Revision A. The discussion describes the purpose of the two Required Actions and why they only affect Functions 1.c and 1.d.

Corresponding changes have also been made to the NUREG-1434 Bases markup, page B 3.3-237.

11. Bases 3.6.1.5, RHR Drywell Spray, page B 3.6-32 and B 3.6-33

The Bases discussion of the RHR Drywell Spray System has been modified to delete the requirement for the heat exchanger to be OPERABLE. The WNP-2 safety analysis does not assume the cooling function of the heat exchanger is functional, only the flow path is needed. Since the flow path is already covered by the words "associated piping," the specific reference to the heat exchanger is not needed.

Corresponding changes have also been made to the NUREG-1434 Bases markup, pages B 3.6-43 and B 3.6-44.

REVISION B SUMMARY OF CHANGES

12. Bases 3.4.10, RHR Shutdown Cooling System—Hot Shutdown, page B 3.4-51, and Bases 3.4.11, RHR Shutdown Cooling System—Cold Shutdown, page B 3.4-55

    The Bases for both of these Specifications have been modified to delete reference to the Fuel Pool Cooling System as a means to cool down the plant. Fuel Pool Cooling can only be used in MODE 5. For MODE 3 operation, a substitute method to cool down the plant (the Condensate and Main Steam Systems) has been provided.

    Corresponding changes have also been made to the NUREG-1434 Bases markup, pages B 3.4-45 and B 3.4-50.

13. Bases 3.4.6, RCS Operational LEAKAGE, page B 3.4-31

    The names of the systems used to monitor unidentified LEAKAGE have been changed to correspond with the plant specific names used in Specification 3.4.8.

    Corresponding changes have been made to the NUREG-1434 Bases markup, page B 3.4-24.

14. Bases 3.3.1.1, RPS Instrumentation, page B 3.3-4

    The description of when the RPS Functions are required to be OPERABLE and why have been modified for consistency with the LCO requirements and recently licensed BWR (Peach Bottom) terminology.

    Corresponding changes have also been made to the NUREG-1434 Bases markup, page B 3.3-4.

15. CTS markup for Specification 3.6.4.1, page 1 of 1, and Discussion of Changes LA.1 to ITS 3.6.4.1 (pages 1 and 2)

    The CTS markup for CTS 4.6.5.1.b.1 shows that this requirement is covered by proposed SR 3.6.4.1.2. However, neither NUREG-1434 SR 3.6.4.1.2 or proposed SR 3.6.4.1.2 requires the blowout panels to be verified closed and sealed every 31 days, as is currently required by CTS 4.6.5.1.b.1. Therefore, a new Discussion of Change, LA.1, has been provided to discuss the relocation of this requirement to plant procedures.

16. Discussion of Changes L.8 to ITS 3.3.1.1 (page 11)

    The first sentence of the Discussion of Change has been clarified to identify the proposed source of the requirement, as requested in the NRC review comments to Section 3.3 (comment 22).

REVISION B SUMMARY OF CHANGES

17. Discussion of Changes A.5 and R.1 to ITS 3.3.3.1 (page 2)

The Discussion of Change A.5 has been modified to justify the addition of proposed ACTION D. The Discussion of Change R.1 has been modified to state that neutron flux monitors, which were previously classified as a Type A variable, are no longer classified as a Type A variable in accordance with NEDO-31588. These two changes were requested in the NRC review comments to Section 3.3 (comment 38 and 39).

18. Discussion of Changes L.3 to ITS 3.3.4.1 (page 4)

The Discussion of Change has been modified to clarify which CTS ACTIONS are being modified. This change was requested in the NRC review comments to Section 3.3 (comment 53).

19. CTS markup for Specification 3.3.6.1, page 6 of 12, and Discussion of Changes A.13 to ITS 3.3.6.1 (page 3)

The word "stop" in footnote * of the CTS markup has been changed to "throttle," consistent with the change made in the CTS markup to Specification 3.3.1.1. A new Discussion of Change, A.13, has been provided, consistent with the same Discussion of Change in ITS 3.3.1.1 (A.13). This change was requested in the NRC review comments to Section 3.3 (comment 71).

20. CTS markup for Specification 3.3.6.2, page 4 of 8

The words "CORE ALTERATIONS and" in the footnote # have been deleted using the Discussion of Change L.3. The Discussion of Change is currently only identified on the footnote # to CTS Table 4.3.2-1. It should also be identified on footnote # to CTS Table 3.3.2-1.

21. CTS markup for Specification 3.7.3, page 1 of 3

The location of the added proposed ACTION D has been changed for clarity. This change was requested in the NRC review comments to Section 3.7 (comment 102).

22. CTS markup for Specification 3.6.1.8, page 1 of 1, and Discussion of Changes LD.1 to ITS 3.6.1.8 (page 2)

The change requesting an extension of the system functional test (CTS 4.6.1.4.c) from 18 months to 24 months is being withdrawn. The system functional test will remain at 18 months. The Discussion of Change requesting this extension has also been deleted.

REVISION B SUMMARY OF CHANGES

23. Discussion of Changes LF.1 to ITS 3.3.1.1 (page 7), Discussion of Changes LE.1 to ITS 3.3.2.2 (page 7), Discussion of Changes LE.1 to ITS 3.3.3.1 (page 7), Discussion of Changes LF.1 to ITS 3.3.4.2 (page 3), Discussion of Changes LF.1 and L.4 to ITS 3.3.5.1 (pages 6 and 8), Discussion of Changes LF.1 to ITS 3.3.5.2 (page 4), Discussion of Changes LE.1 and LF.1 to ITS 3.3.6.1 (pages 12 and 13), Discussion of Changes LF.1 to ITS 3.3.6.2 (page 5), Discussion of Changes LF.1 to ITS 3.3.8.1 (pages 4 and 5), and Discussion of Changes LF.1 to ITS 3.3.8.2 (page 2)

The description of the methodology used to determine the proper Allowable Value (LF.1 changes) for the affected instrumentation Functions has been changed from the 1994 version of the ISA methodology to the 1982 ISA methodology. In addition, for the CHANNEL CALIBRATION Frequency extensions (LE.1 changes), the proper title for the 1982 ISA methodology has been provided. This is the correct methodology WNP-2 has used and this methodology has been approved for use by the NRC, as described in RG 1.105, Revision 2, February 1986 (as stated in all the LE.1 and LF.1 changes).

24. Technical Specifications, Bases, CTS markups and Discussion of Changes, NUREG ITS markup and Justification for Deviations, and NUREG Bases markup and Justification for Deviations

The following changes are proposed to Chapter 1.0 and Sections 3.3 and 3.7 as requested by the NRC reviewer during phone conversations with WNP-2 personnel to resolve NRC reviewer comments/questions:

(Comment 14) Specification 3.3.1.1, SR 3.3.1.1.7 Frequency, page 3.3-5; and Bases 3.3.1.1, SR 3.3.1.1.7, page B 3.3-27; CTS markup for Specification 3.3.1.1, page 8 of 11; Discussion of Changes A.10 to ITS 3.3.1.1 (page 3); NUREG ITS markup, SR 3.3.1.1.7, page 3.3-4; and NUREG Bases markup SR 3.3.1.1.7, page B 3.3-28;

(Comment 21) Discussion of Changes LA.5 to ITS 3.3.1.1 (page 5);

(Comment 24) Discussion of Changes L.10 to ITS 3.3.1.1 (page 11);

(Comment 25) Discussion of Changes M.1 to ITS 3.3.1.1 (page 4);

(Comment 29) Discussion of Changes LA.2 to ITS 3.3.2.1 (page 2);

(comment 33) Discussion of Changes L.3 to ITS 3.3.2.1 (page 3);

(Comment 45) Justification for Deviations to Section 3.3, comment number 18 (page 3);

REVISION B SUMMARY OF CHANGES

24. (continued)

(Comment 46) Discussion of Changes A.2 to ITS 3.3.3.2 (page 1);

(Comments 54 & 55) CTS markup for Specification 3.3.4.2, pages 1 of 4 and 3 of 4, Discussion of Changes M.1 and L.1 to ITS 3.3.4.2 (page 1 and 3), and NSHE for ITS 3.3.4.2, L.1, page 1;

(Comment 58) Section 1.1, Definition of MFLPD, page 1.1-5, Bases 3.2.4, LCO Section, page B 3.2-15, CTS markup for Chapter 1.0, page 7 of 19, NUREG ITS markup, pages 1.1-2, 1.1-3, and 1.1-5, Justification for Deviations to Chapter 1.0, comment numbers 7 and 10, and NUREG Bases markup, page B 3.2-15;

(Comments 85, 86 and 87) Discussion of Changes M.4, L.2, and L.3 to ITS 3.3.7.1 (pages 2 and 4);

(Comment 88) CTS markup for Specification 3.3.7.1, pages 2 of 4, 2 of 4, and 4 of 4, and Discussion of Changes A.4, A.5, and L.1 to ITS 3.3.7.1 (pages 1 and 3);

(Comment 101) Discussion of Changes A.1 to ITS 3.7.3 (page 1);

(Comment 115) CTS Markup for Specification 3.3.8.1, pages 3 of 5 and 4 of 5, Discussion of Changes A.5, A.6, and L.3 to ITS 3.3.8.1 (pages 1 and 6), and NSHE for ITS 3.3.8.2, page 3; and

(Comment 118) Discussion of Changes A.1 to ITS 3.7.7 (page 1).

25. Discussion of Changes L.1 to ITS 3.10.8 (page 2) and NSHE for ITS 3.10.8, L.1, page 1

The Discussion of Change and NSHE were modified to state that SR 3.0.1 will ensure that Surveillances are met prior to entry into the Applicability of the LCO (MODE 5). If the SR is not performed prior to entering the Applicability, as soon as the test commences, SR 3.0.1 would require the LCO to be declared not met. This would require immediate action be taken to suspend the test as started in the ACTIONS of ITS 3.10.8. Therefore, SR 3.0.1 precludes the test from being performed if the SR is not current. This change was requested by the NRC reviewer to resolve Section 3.10, comment 5.

REVISION B SUMMARY OF CHANGES

26. Specification 3.4.1, Recirculation Loops Operating, SR 3.4.1.1, page 3.4-3 and B 3.4-9

The SR is being changed to verify recirculation loop drive flow mismatch, instead of the NUREG recirculation loop jet pump flow mismatch. Currently, WNP-2 verifies recirculation loop drive flow. The installed instrumentation provide this indication rather than recirculation loop jet pump flow. The two methods essentially determine the same ratio, therefore, they are considered equivalent methods in determining flow mismatch. This change is related to the NRC reviewer comment to Section 3.4 (comment 1).

Corresponding changes have also been made to NUREG-1434 ITS markup, page 3.4-2, and to NUREG-1434 Bases markup, page B 3.4-5.

27. Specification 3.4.7, RCS PIV Leakage, Required Action Note, pages 3.4-13 and B 3.4-37

The note has been modified to only apply to check valves, consistent with CTS. This note was inadvertently applied to all valves, as noted in the NRC review comments to Section 3.4, comment 4.

Corresponding changes have also been made to NUREG-1434 ITS markup, page 3.4-11, to the Justification for Deviations to Section 3.4, comment number 11 (page 2), and to the NUREG-1434 Bases markup, page B 3.4-30.

28. Discussion of Changes L.1 to ITS 3.9.1 (page 2), Discussion of Changes L.3 and L.4 to ITS 3.9.2 (page 2), Discussion of Changes L.2 to ITS 3.9.3 (pages 1 and 2), Discussion of Changes L.1 to ITS 3.9.6 (page 1), Discussion of Changes L.2 to ITS 3.9.7 (page 2), NSHE for ITS 3.9.1, L.1, page 1, NSHE for ITS 3.9.2, L.3 and L.4, pages 4 and 5, NSHE for ITS 3.9.3, L.2, page 2, NSHE for ITS 3.9.6, L.1, page 1, and NSHE for ITS 3.9.7, L.2, page 2

The Discussion of Changes and NSHE were modified to state that SR 3.0.1 will ensure the applicable Surveillance is met prior to entry into the Applicability of the LCO. If the SR is not performed prior to entering the Applicability, as soon as the LCO's Applicability is entered, SR 3.0.1 would require the LCO to be declared not met. This would require immediate action be taken to exit the Applicability of the LCO, as stated in the individual LCO's ACTIONS. Therefore, SR 3.0.1 precludes the associated LCO's Applicability from being entered if the SR is not current. This change was requested by the NRC reviewer to resolve Section 3.9, comment 1.

29. Discussion of Changes L.1 to ITS 3.9.4 (page 2)

The Discussion of Change was clarified to justify the deletion of the three current surveillances. This change was requested by the NRC reviewer to resolve Section 3.9, comment 2.

REVISION B SUMMARY OF CHANGES

30. Discussion of Changes LA.1 to ITS 5.4 (pages 1 and 2) and Discussion of Changes LA.1 to CTS 6.10 (page 1)

The Discussion of Changes have been revised to relocate the details to the Quality Assurance Program and control any changes in accordance with 10 CFR 50.54(a). These changes were requested by the NRC reviewer to resolve Chapter 5.0, comments 1 and 7.

31. Justification for Deviations to Chapter 5.0, comment number 20 (page 3)

Justification has been provided for deletion of the prefilter pressure drop test from the NUREG. Currently, WNP-2 does not require this test and it was not added to the WNP-2 ITS. This change was requested by the NRC reviewer to resolve Chapter 5.0, comment 5.

32. NUREG-1434 ITS markup, page 3.4-26, Justification for Deviations to Section 3.4, comment number 16 (page 2), and NUREG-1434 Bases markup, page 3.4-58

The Justification for Deviation to NUREG ITS SR 3.4.11.3 and SR 3.4.11.4 was annotated by TSTF-35. Since this TSTF-35 change has not yet been approved, a plant specific justification, consistent with the justification provided in TSTF-35, has been added. This change was requested by the NRC reviewer to resolve Section 3.4, comment 8.

33. CTS markup for Specification 3.5.2, pages 3 of 5, 4 of 5, and 5 of 5, and Discussion of Changes A.6, A.7, A.8, and L.4 to ITS 3.5.2 (pages 2, 3, and 5)

The Discussion of Change A.6 has been incorporated into Discussion of Change L.4. Discussion of Changes A.7 and A.8 have been renumbered A.6 and A.7. This change was made at the request of the NRC reviewer during a phone conference resolving Section 3.5 comments.

34. Specification 3.9.1, LCO and Applicability, Pages 3.9-1, 3.9-2, and B 3.9-3

The current wording of LCO 3.9.1 and the associated Applicability could imply that all the refueling equipment interlocks are required at all times during in-vessel fuel movement. The Current Licensing Basis only requires the interlocks associated with the mode switch refuel position. Interlock associated with other positions of the reactor mode switch are not required when the reactor mode switch is in the refuel position, not when it is in the shutdown position. Therefore, to avoid confusion, the LCO and Applicability have been modified to state that the refueling interlocks are those associated with the mode switch refuel position, and that it is applicable when the reactor mode switch is in the refuel position. It is the belief of the Supply System that this is consistent with the intent of the NUREG.

REVISION B SUMMARY OF CHANGES

34. (continued)

Corresponding changes have also been made to the NUREG-1434 ITS markup, page 3.9-1, to the Justification for Deviations to Section 3.9, comment number 7 (page 1), and to the NUREG-1434 Bases markup, pages B 3.9-2 and B 3.9-3.

35. Specification 3.3.3.2, SR 3.3.3.2.2 and SR 3.3.3.2.3, pages 3.3-28 and B 3.3-75

The Frequency of the CHANNEL CALIBRATION for the suppression pool water level instrumentation channel has been extended from 18 months to 24 months, consistent with the guidance of GL 91-04. The sensor for this instrument is common to the Post Accident Monitoring suppression pool water level instrumentation channel. The Post Accident Monitoring suppression pool water level instrumentation calibration extension was proposed in the original ITS submittal (see Discussion of Changes LE.1 to ITS 3.3.3.1). Because the loop (other than this Remote Shutdown Panel) is required to be calibrated every 24 months, this change justifies the 24 month frequency for the Remote Shutdown Panel portion of the loop. This change modifies SR 3.3.3.2.2 (the CHANNEL CALIBRATION at an 18 month Frequency) to exclude the suppression pool water level instrumentation channel, adds a new 24 month CHANNEL CALIBRATION Surveillance Frequency (SR 3.3.3.2.3), and a renumbers of current SR 3.3.3.2.3 to SR 3.3.3.2.4.

Corresponding changes have also been made to the CTS markup for Specification 3.3.3.2, pages 1 of 3 and 3 of 3, to the Discussion of Changes M.1 and LE.1 for ITS 3.3.3.1 (pages 1 and 2), to the NUREG-1434 ITS markup, page 3.3-25, and to the NUREG-1434 Bases markup, page B 3.3-69.

36. Specification 3.3.6.1, Table 3.3.6.1-1, Function 5.e Allowable Value, page 3.3-38

The Allowable Value has been changed for consistency with the setpoint calculations. The calculations were recently corrected to remove a head correction factor incorrectly included in the Allowable Value.

Corresponding changes have also been made to the CTS markup for Specification 3.3.6.1, page 9 of 12, to the Discussion of Changes M.6 to ITS 3.3.6.1 (page 5), and to the NUREG-1434 ITS markup, page 3.3-61.

37. Specification 3.3.5.1, Table 3.3.5.1-1, Functions 1.c, 1.d, 2.c, and 2.d, and Specification 3.3.8.1, Table 3.3.8.1-1, Functions 1.b, 1.c, 1.d, and 2.b, pages 3.3-42, 3.3-43, 3.3-44, 3.3-45, 3.3-46, 3.3-69, 3.3-70, B 3.3-130, B 3.3-131, B 3.3-211, and B 3.3-212

REVISION B SUMMARY OF CHANGES

37. (continued)

The CHANNEL CALIBRATION Frequency for these instrument Functions has been changed from 92 days (for Specification 3.3.5.1) and 18 months (for Specification 3.3.8.1) to 24 months consistent with the 24 month calibration interval in the setpoint calculations. These instrument functions are not in the CTS. When added, the incorrect CHANNEL CALIBRATION Surveillance Frequency was used. Therefore, the 92 day CHANNEL CALIBRATION SR and the 18 month CHANNEL CALIBRATION SR have been replaced with new SR 3.3.5.1.5 and new SR 3.3.8.1.3, respectively (24 month CHANNEL CALIBRATIONS). In addition, old SR 3.3.5.1.5 and SR 3.3.8.1.3 have been renumbered, which affects all Functions in Tables 3.3.5.1-1 and 3.3.8.1-1.

Corresponding changes have also been made to the CTS markup for Specification 3.3.5.1, page 1 of 12 and 12 of 12, to the Discussion of Changes M.2 and LD.1 for ITS 3.3.5.1 (pages 3 and 5), to the CTS markup for Specification 3.3.8.1, page 1 of 5, to the Discussion of Changes LD.1 for ITS 3.3.8.1 (page 3), to the NUREG-1434 ITS markup, pages 3.3-40, 3.3-41, Insert Page 3.3-41, 3.3-42, Insert Page 3.3-42, 3.3-43, 3.3-44, 3.3-45, 3.3-81, and 3.3-82, to the Justification for Deviations to Section 3.3, comment numbers 24 and 41 (pages 4 and 6), and to the NUREG-1434 Bases markup, pages B 3.3-127, B 3.3-128, and B 3.3-239.

38. Discussion of Changes L.2 to ITS 3.8.7 (page 2) and Discussion of Changes L.1 to ITS 3.8.8 (page 3)

The Discussion of Changes have been modified to describe the primary and alternate verification methods for power availability. This change was requested by the NRC reviewer to resolve Section 3.8, comment 14.

39. Bases 3.6.1.7, Suppression Chamber-to Drywell Vacuum Breakers, page B 3.6-44

The LCO Bases Section has been clarified for the vacuum breaker operability. Both vacuum breaker disks are required to be OPERABLE for opening and closed for the vacuum breaker to be considered OPERABLE. Background Section details have been added to the LCO Section for clarity and consistency. This change was requested by the NRC reviewer to resolve Section 3.6, comment 8.

Corresponding changes have been made to the NUREG-1434 Bases markup, Insert page B 3.6-47i.

REVISION B SUMMARY OF CHANGES

40. Discussion of Changes LB.1 to ITS 3.3.1.1 (page 6), Discussion of Changes LB.1 to ITS 3.3.5.1 (page 5), Discussion of Changes LB.1 to ITS 3.3.5.2 (page 3), Discussion of Changes LB.1 to ITS 3.3.6.1 (page 7), and Discussion of Changes LB.1 to ITS 3.3.6.2 (page 4)

    The Discussion of Changes have been modified to state that the generic reliability analyses are applicable to the WNP-2 design and NRC SER requirements accepting the generic reliability analyses have been met by WNP-2. The appropriate plant specific NRC SER that documents the acceptance of the WNP-2 design and that WNP-2 complies with the requirements of the generic NRC SER has also been provided. This change was requested by the NRC reviewer to resolve Section 3.3 (Allowable Value issues), comment 3.

41. Discussion of Changes LB.1 and LB.2 to ITS 3.3.2.2 (page 2), Discussion of Changes LB.1, LB.2, and LB.3 to ITS 3.3.4.1 (pages 2 and 3), Discussion of Changes LB.1 and LB.2 to ITS 3.3.4.2 (pages 1 and 2), and Discussion of Changes LB.1 to ITS 3.3.7.1 (page 3)

    The Discussion of Changes have been modified to state that the generic reliability analyses are applicable to the WNP-2 design and the NRC SER requirements accepting the generic reliability analyses have been met by WNP-2. In addition, for those "LB" Discussion of Changes extending the CHANNEL FUNCTIONAL TEST Frequency, a statement has been added that WNP-2 has confirmed that the setpoint calculation methodology accounted for instrument drift due to the extended Frequency. This change was requested by the NRC reviewer to resolve Section 3.3 (Allowable Value issues), comment 3.

42. NUREG-1434 ITS markup, page 3.6-13, and Justification for Deviations to Section 3.6, comment number 39 (page 7)

    A Justification for Deviation has been added to explain the deletion of the phrase in NUREG Condition I (proposed Condition F): "or during operations with a potential for draining the reactor vessel (OPDRVs)." The Condition is applicable in MODES 4 and 5, the only MODES in which OPDRVs can be performed. In addition, there are no PCIVs required to be OPERABLE in the WNP-2 ITS with an Applicability of only during OPDRVS. The only PCIVs required when not in MODES 1, 2, and 3 are the RHR shutdown cooling isolation valves, and their Applicability is MODES 4 and 5. Therefore, the "during OPDRVs" Applicability is duplicative of the MODES 4 and 5 Applicability (which is being maintained) and can be deleted.

REVISION B SUMMARY OF CHANGES

43. Justification for Deviations to Section 3.6, comment number 8 (page 1)

The Justification for Deviations to Section 3.6, comment number 8 has been expanded. The phrase inside the brackets for NUREG Conditions A, B, C, and D has been modified to reflect the different leakage categories. Since there is more than one, the generic word "leakage" has been used. The PCIVs are required to be OPERABLE such that they are in the accident position or can be automatically repositioned to the accident position. Certain PCIVs have individual leakage limits. These leakage limits are in addition to the type A, B, and C limits required by LCO 3.6.1.1, Primary Containment OPERABILITY. If a type A, B, or C limit were exceeded due to an individual valve exceeding its specific leakage limit, Note 4 to LCO 3.6.1.3 would require the ACTIONS of LCO 3.6.1.1 to be taken (which require primary containment to be restored within 1 hour).

The change reflects that different compensatory actions are required based on the cause of the inoperability. In the WNP-2 ITS, ACTION A is taken if the PCIV is inoperable for reasons other than leakage; ACTIONS D and E are required if the SRs for individual valve leakage limits are not met. Currently the NUREG Condition A exempts purge valve leakage requirements and secondary containment bypass leakage requirements. If a MSIV or a hydrostatically tested valve was not meeting the leakage limits, Condition A would be entered and Required Action A would be required. This Required Action allows the penetration to be isolated. However, isolating the penetration can be performed by using the leaking valve. This would not provide adequate compensatory measures to allow continued operation. When a MSIV or hydrostatically tested valve leakage is not within limits, Condition D should be entered. The Required Action for this Condition would require the leakage to be restored within limit in 4 hours, consistent with the time provided in Required Action A.1 to isolate the penetration. As discussed in the NUREG Bases, the leakage can be restored by isolating the penetration with a valve not exceeding the leakage limits. This is more restrictive than Required Action A.1, which allows isolation using the leaking valve. Conditions B and C have also been modified to exclude leakage. These Conditions are appropriate if the valve is in the incorrect position or will not close. As discussed above, the Required Actions for Conditions B and C would also allow the penetration to be isolated using the leaking valve if the bracketed phrase were not deleted.

44. Discussion of Changes L.6 to ITS 3.3.6.1 (page 15)

The Discussion of Changes was modified to clarify purpose of the instruments. This change was requested by the NRC reviewer (SCSB) to resolve comment 1 to the I&C related changes.

REVISION B SUMMARY OF CHANGES

45. Discussion of Changes L.5 to ITS 3.8.4 (page 4)

The Discussion of Changes was modified to explicitly state the battery charger vendor recommendations and the rationale behind these recommendations.

46. Discussion of Changes L.20 to ITS 3.8.1 (page 15)

The Discussion of Changes was modified to state the total ECCS response time (for each ECCS subsystem), including the individual component response times, and the source document for this information.

47. Specification 3.8.4, DC Sources-Operating, SRs 3.8.4.3, 3.8.4.4, 3.8.4.5, and 3.8.4.8, pages 3.8-27, 3.8-29, B 3.8-56, B 3.8-57, and B 3.8-60

The Surveillance Frequencies for SRs 3.8.4.3, 3.8.4.4, 3.8.4.5, and 3.8.4.8 (second Frequency) have been changed from 18 months to 12 months. WNP-2 currently performs these Surveillances every 12 months during the annual refueling and maintenance outage. The proposed 12 month Frequency is consistent with IEEE-450 recommendations.

Corresponding changes have also been made to the CTS markup for Specification 3.8.4, pages 2 of 4 and 3 of 4, to the Discussion of Changes M.1 to ITS 3.8.4 (page 1), to the NUREG-1434 ITS markup, pages 3.8-28 and 3.8-30, and to the NUREG-1434 Bases markup, pages B 3.8-56, Insert B 3.8-56, and B 3.8-59.

48. Discussion of Changes A.5 to ITS 3.4.12 (page 2)

The Discussion of Changes was modified to state that SR 3.0.1 will ensure the applicable Surveillance is met prior to entry into the Applicability of the SR. The Applicability of the SR is stated in the Note to the SR. If the SR is not performed prior to commencing tensioning of the reactor vessel head bolting studs, as soon as tensioning starts, SR 3.0.1 requires the LCO to be declared not met. This will require immediate action to be taken to restore the limit and perform an engineering evaluation to determine the RCS is acceptable for operation, as stated in the LCO's ACTIONS. Therefore, SR 3.0.1 essentially precludes the tensioning from starting if the SR is not current. This change was requested by the NRC reviewer to resolve a comment concerning Section 3.4.

49. Bases 3.8.1, AC Sources - Operating, pages B 3.8-22, B 3.8-23, B 3.8-24, B 3.8-27, and B 3.8-28

The reactive load values corresponding to the power factor limits have been added to the Bases for SR 3.8.1.9, SR 3.8.1.10, and SR 3.8.1.14. In addition, a discussion to DG excitation system limitation ratings) has been added to the associated SR Notes.

REVISION B SUMMARY OF CHANGES

49. (continued)

Corresponding changes have also been made to the NUREG-1434 Bases markup, pages B 3.8-22, Insert page B 3.8-22, B 3.8-23, Insert page B 3.8-23, B 3.8-28, and Insert page B 3.8-28.

50. Specification 5.5.8, Explosive Gas and Storage Tank Radioactivity Monitoring Program, page 5.0-14

The limit for the outside temporary liquid radwaste tanks has been modified based on NRC reviewer comments concerning 10 CFR 20 requirements.

Corresponding changes have also been made to the CTS markup for Specification 5.5, page 15 of 17, and to the NUREG-1434 ITS markup, page 5.0-14.

51. Specification 1.1, Definition of L_a, Specification 3.6.1.1, Primary Containment, SR 3.6.1.1.1, Specification 3.6.1.2, Primary Containment Air Lock, SR 3.6.1.2.1, Specification 3.6.1.3, PCIVs, SRs 3.6.1.3.10, 3.6.1.3.11, and 3.6.1.3.12, and Specification 5.5.12, Primary Containment Leakage Rate Testing Program, pages 1.1-4, 3.6-2, 3.6-7, 3.6-15, 3.6-16, 5.0-17, B 3.0-12, B 3.6-1, B 3.6-2, B 3.6-3, B 3.6-4, B 3.6-5, B 3.6-11, B 3.6-12, B 3.6-13, B 3.6-27, and B 3.6-28

The Technical Specifications have been modified to reflect 10 CFR 50, Appendix J, Option B testing requirements recently approved in Amendment 144 to the WNP-2 Technical Specifications. The ITS revision uses the guidance provided in the NRC letter from C. I. Grimes to D. J. Modeen, dated November 2, 1995.

Corresponding changes have also been made to the CTS markup for Chapter 1.0, pages 5 of 19 and 6 of 19, to the Discussion of Changes A.11 for ITS Chapter 1.0 (page 3), to the CTS markup for Specification 3.6.1.1, pages 1 of 9 through 9 of 9, to the Discussion of Changes A.3, A.5, A.6, and A.7 for ITS 3.6.1.1 (pages 1 and 2), to the CTS markup for Specification 3.6.1.2, pages 1 of 2 and 2 of 2, to the Discussion of Changes A.2 and A.6 for Specification 3.6.1.2 (pages 1 and 2), to the CTS markup for Specification 3.6.1.3, pages 1 of 22 through 22 of 22, to the Discussion of Changes M.3, LA.4 (new), and L.10 for ITS 3.6.1.3 (pages 3, 4, and 7), to the CTS markup for Specification 5.5, pages 1 of 17 through 17 of 17, to the Discussion of Changes A.12 (new) for ITS 5.5 (page 2), to the NSHE L.10 for ITS 3.6.1.3 (page 11), to the NUREG-1434 ITS markup, page 1.1-4, to the Justification for Deviations to Chapter 1.0, comment number 10 (new), page 1, to the NUREG-1434 ITS markup, pages 3.6-2, 3.6-7, 3.6-17, and 3.6-18, to the Justification for Deviation to Section 3.6, comment number

REVISION B SUMMARY OF CHANGES

51. (continued)

40 (new), page 7, to the NUREG-1434 ITS markup, pages 5.0-17 and Insert page 5.0-17 (new), to the Justification for Deviations to Chapter 5.0, comment number 31 (new), page 4, to the NUREG-1434 Bases markup, pages B 3.0-13 and Insert Page B 3.0-13, to the Justification for Deviations to Bases Section 1.0, comment number 9 (new), page 1, and to the NUREG-1434 Bases markup, pages B 3.6-2, B 3.6-4, B 3.6-5, B 3.6-12, B 3.6-14, B 3.6-30, B 3.6-31, and B 3.6-32.

52. Discussion of Changes L.1 to ITS Chapter 4.0 (page 3)

The term "safe shielding level" used by the NRC in NUREG-0892 has been clarified by the addition of the parenthetical phrase "i.e., the fuel will remain covered, as required by Regulatory Guide 1.13, Rev. 1." This change was requested by the NRC reviewer during a phone conversation to resolve a comment concerning Chapter 4.0.

53. Specification 3.4.7, RCS PIV Leakage, SR 3.4.7.1, pages 3.4-15 and B 3.4-37

The minimum test pressure has been provided. This change was verbally requested by the NRC reviewer to resolve a comment concerning Section 3.4.

Corresponding changes have also been made to the NUREG-1434 ITS markup, page 3.4-13 and to the NUREG-1434 Bases markup, page B 3.4-31.

54. Specification 3.5.1, ECCS-Operating, LCO, pages 3.5-1, B 3.5-5, and B 3.5-7

The change requesting a reduction in the number of required ADS valves from six to five has been withdrawn at the request of the NRC reviewer. The original change will be considered on a generic basis for all BWRs.

Corresponding changes have also been made to the CTS markup for Specification 3.5.1, pages 1 of 6 and 3 of 6, to the Discussion of Changes A.6 (new) and L.1 for ITS 3.5.1 (pages 2 and 4), to the NUREG-1434 ITS markup, page 3.5-1, and to the NUREG-1434 Bases markup, pages B 3.5-4 and B 3.5-7.

55. Discussion of Changes LA.2 to ITS 3.8.4, page 2

Additional justification has been provided for the relocation of the $\pm$ 24 volt batteries and associated chargers. This change was verbally requested by the NRC reviewer to resolve a comment concerning Section 3.8.

REVISION B SUMMARY OF CHANGES

56. Specification 3.8.4, DC Sources-Operating, SRs 3.8.4.2 and 3.8.4.5, page 3.8-27

The change requesting relocation of the battery connection resistances from the Technical Specifications to the Bases has been withdrawn.

Corresponding changes have also been made to the CTS markup for Specification 3.8.4, page 2 of 4, to the Discussion of Changes M.2 (new) and LA.3 (deleted) for ITS 3.8.4, pages 1 and 2, to the NUREG-1434 ITS markup, page 3.8-28 and new insert page 3.8-38, and to the Justification for Deviations to Section 3.8, comment number 21 (deleted)(page 4).

57. Technical Specifications - Editorial Changes/Typographical Errors

Minor changes are proposed to the following Technical Specifications for consistency, clarity, or to correct typographical errors:

Specification 3.3.3.1, SR 3.3.3.1.2, page 3.3-25;

Specification 3.4.2, Header, pages 3.4-3 and 3.4-4;

Specification 3.4.6, Required Action B.1, page 3.4-11;

Specification 3.6.2.2, LCO, page 3.6-31;

Specification 3.6.3.2, Title of Specification, pages 3.6-36 and 3.6-37;

Specification 3.8.1, SR 3.8.1.15, page 3.8-15;

Specification 3.8.2, LCO 3.8.2.a, page 3.8-19;

Specification 3.8.3, Conditions A and F, and Required Action A.1, pages 3.8-23 and 3.8-24; and

Specification 5.5.7.c, page 5.0-13.

58. Bases - Editorial Changes/Typographical Errors

Minor changes are proposed to the following Technical Specifications Bases for consistency, clarity, or to correct typographical errors:

B 3.3.1.2, Surveillance Requirements Section, page B 3.3-40;

B 3.4.8, References Section, page B 3.4-43;

B 3.4.11, Background Section, page B 3.4-53;

REVISION B SUMMARY OF CHANGES

58. (continued)

B 3.5.1, Applicable Safety Analyses Section, page B 3.5-4:

B 3.5.2, Applicable Safety Analyses Section, page B 3.5-16;

B 3.6.3.1, LCO Section, page B 3.6-16;

B 3.6.3.2, Title, Background Section, Applicable Safety Analyses Section, and Applicability Section, pages B 3.6-70, B 3.6-71, B 3.6-72, and B 3.6-73;

B 3.9.6, Background Section, page B 3.9-19;

B 3.9.8, Background Section, page B 3.9-25;

B 3.9.9, Background Section, page B 3.9-29; and

B 3.10.8, Actions Section, page B 3.10-34.

59. CTS Markups and Discussion of Changes - Editorial Changes/ Typographical Errors

Minor changes are proposed to the following CTS markups and Discussion of Changes for consistency, clarity, or to correct typographical errors:

CTS markup for Specification 3.1.3, page 1 of 9, and Discussion of Changes L.4 and L.11 to ITS 3.1.3 (pages 9 and 11);

Discussion of Changes LD.1 to ITS 3.1.7 (page 3);

CTS markup for Specification 3.3.1.1, page 7 of 11;

Discussion of Changes LE.1 to ITS 3.3.2.2 (page 7);

Discussion of Changes LE.1 to ITS 3.3.3.1 (page 8);

Discussion of Changes A.2, A.3, and M.1 to ITS 3.3.5.2 (pages 1 and 2);

Discussion of Changes R.1, LE.1, and L.2 to ITS 3.3.6.1 (pages 3, 12, and 14);

Discussion of Changes M.4 to ITS 3.3.7.1 (page 3);

Discussion of Changes LD.1 to ITS 3.3.8.1 (page 4);

CTS markup for Specification 3.4.1, page 11 of 11;

REVISION B SUMMARY OF CHANGES

59. (continued)

Discussion of Changes LA.4 to ITS 3.4.1 (page 4);

Discussion of Changes A.1 to ITS 3.4.7 (page 1);

CTS markup for Specification 3.5.2 pages 2 of 5 and 3 of 5;

Discussion of Changes LA.1 and LA.2 to ITS 3.5.3 (page 1);

Discussion of Changes header to ITS 3.6.1.2 (page 4);

Discussion of Changes A.1 and LA.2 to ITS 3.6.1.3 (pages 1 and 3);

CTS markup for Specification 3.6.3.2, page 1 of 1, and the Discussion of Changes Title to ITS 3.6.3.2 (page 1);

CTS markup for Specification 3.6.4.2, page 3 of 3, and Discussion of Changes L.1 to ITS 3.6.4.2 (page 3);

Discussion of Changes A.3 and A.5 to ITS 3.7.3 (page 1);

CTS markup for Specification 3.8.1, pages 4 of 9 and 6 of 9, and Discussion of Changes M.6 and LA.4 to ITS 3.8.1 (pages 4 and 6);

Discussion of Changes A.1 to ITS 3.8.5 (page 1);

Discussion of Changes M.3 to ITS 3.8.8 (page 2);

Discussion of Changes R.1 to CTS 3/4.9.7 (page 1);

Discussion of Changes A.7 to ITS 3.10.4 (page 2);

Discussion of Changes Header to CTS 3/4.10.5 (page 1);

Discussion of Changes Header to CTS 3/4.10.6 (page 1);

Discussion of Changes A.3 to ITS Chapter 4.0 (page 1);

Discussion of Changes L.1 to ITS 5.2 (page 4);

CTS markup for Specification 5.5, pages 11 of 17 and 13 of 17, and Discussion of Changes LA.4 to ITS 5.5 (page 4); and

Discussion of Changes Title to CTS 6.10 (page 1).

REVISION B SUMMARY OF CHANGES

60. No Significant Hazards Evaluations - Editorial Changes/ Typographical Errors

Minor changes are proposed to the following No Significant Hazards Evaluations for consistency, clarity, or to correct typographical errors:

NSHE for ITS 3.6.3.2, Title, page 1;

NSHE for CTS 3/4.10.5, Header, page 1; and

NSHE for CTS 3/4.10.6, Header, page 1.

61. NUREG ITS Markup and Justification for Deviations - Editorial Changes/Typographical Errors

Minor changes are proposed to the following NUREG ITS markups and Justification for Deviations for consistency, clarity, or to correct typographical errors:

Justification for Deviations to Chapter 2.0, Header (page 1);

Specification 3.3.8.2, SR 3.3.8.2.4, page 3.3-85;

Specification 3.4.5, Required Action B.1, page 3.4-9;

Specification 3.6.3.2, Title of Specification, Insert pages 3.6-41a and 3.6-41b, and Justification for Deviations to Section 3.6, comment number 33 (page 6);

Justification for Deviations to Section 3.6, comment number 9 (page 1);

Specification 3.8.1, SR 3.8.1.15, page 3.8-15;

Specification 3.8.2, LCO 3.8.2.a and ACTIONS Note, pages 3.8-20 and 3.8-21;

Specification 3.8.3, Conditions A and F, and Required Action A.1, pages 3.8-24 and 3.8-25;

Specification 3.8.4, SR 3.8.4.3, page 3.8-28;

Specification 5.5.7.c, page 5.0-12;

Specification 5.5.9, page 5.0-14; and

Specification 5.6.2, page 5.0-19.

REVISION B SUMMARY OF CHANGES

62. NUREG Bases Markup and Justification for Deviations - Editorial Changes/Typographical Errors

Minor changes are proposed to the following NUREG ITS markups and Justification for Deviations for consistency, clarity, or to correct typographical errors:

Bases 3.3.8.2, SR 3.3.8.2.4, page B 3.3-246;

Bases 3.4.8, Reference Section, page B 3.4-37;

Bases 3.4.11, Background Section, page B 3.4-47:

Justification for Deviations to Section 3.4, comment number 8 (page 1);

Bases 3.5.1, Applicable Safety Analyses and Actions Sections, pages B 3.5-4 and B 3.5-6;

Bases 3.5.2, Applicable Safety Analyses Section, page B 3.5-14;

Bases 3.6.1.3, LCO Section, page B 3.6-17;

Bases 3.6.3.2, Title, Background Section, Applicable Safety Analyses Section, and Applicability Section, Insert pages B 3.6-86a, B 3.6-86b, B 3.6-86c, B 3.6-86d, B 3.6-86e, and B 3.6-86f, and Justification for Deviations to Bases Section 3.6, comment number 16 (page 2);

Bases 3.8.3, Reference Section, page B 3.8-50;

Bases 3.9.6, Background Section, page B 3.9-19;

Bases 3.9.8, Background Section, page B 3.9-25;

Bases 3.9.9, Background Section, page B 3.9-29;

Bases 3.10.2, SR 3.10.2.1 and SR 3.10.2.2, page Insert B 3.10-10; and

Bases 3.10.8, Actions Section, pages B 3.10-36 and B 3.10-37, and Justification for Deviations to Section 3.10, comment number 14 (page 1).

INSERT AND REMOVE INSTRUCTIONS

VOLUME 1, SPLIT REPORT	
DISCARD	INSERT
Page 8 of Summary Disposition Matrix	Page 8 of Summary Disposition Matrix
Page 1 of 28	Page 1 of 28
Page 2 of 28	Page 2 of 28
VOLUME 2, TECHNICAL SPECIFICATIONS	
DISCARD	INSERT
1.1-4 through 1.1-7	1.1-4 through 1.1-7
2.0-1 through 2.0-2	2.0-1
3.1-19	3.1-19
3.3-5	3.3-5
3.3-25	3.3-25
3.3-28	3.3-28
3.3-42 through 3.3-46	3.3-42 through 3.3-46
3.3-55	3.3-55
3.3-58	3.3-58
3.3-69 through 3.3-72	3.3-69 through 3.3-72
3.4-3 through 3.4-29	3.4-3 through 3.4-30
3.5-1	3.5-1
3.6-2	3.6-2
3.6-7	3.6-7
3.6-15 through 3.6-48	3.6-15 through 3.6-47
3.8-15	3.8-15
3.8-19	3.8-19
3.8-23	3.8-23
3.8-24	3.8-24
3.8-27 through 3.8-29	3.8-27 through 3.8-29
3.9-1 through 3.9-15	3.9-1 through 3.9-16
3.10-9	3.10-9

INSERT AND REMOVE INSTRUCTIONS

VOLUME 2, TECHNICAL SPECIFICATIONS	
DISCARD	INSERT
5.0-13 through 5.0-15	5.0-13 through 5.0-15
5.0-17 through 5.0-26	5.0-17 through 5.0-27
VOLUME 3, BASES	
DISCARD	INSERT
B 2.0-5 through B 2.0-10	B 2.0-5 through B 2.0-8
B 3.0-12	B 3.0-12
B 3.0-13	B 3.0-13
B 3.2-15	B 3.2-15
B 3.3-4	B 3.3-4
B 3.3-27	B 3.3-27
B 3.3-40	B 3.3-40
B 3.3-75	B 3.3-75
B 3.3-76	B 3.3-76
B 3.3-130	B 3.3-130
B 3.3-131	B 3.3-131
B 3.3-209 through B 3.3-212	B 3.3-209 through B 3.3-212
B 3.3-214 through B 3.3-220	B 3.3-214 through B 3.3-220
B 3.4-9	B 3.4-9
B 3.4-10	B 3.4-10
B 3.4-31	B 3.4-31
B 3.4-37	B 3.4-37
B 3.4-38	B 3.4-38
B 3.4-43	B 3.4-43
B 3.4-51	B 3.4-51
B 3.4-53	B 3.4-53
B 3.4-55	B 3.4-55
B 3.4-56	B 3.4-56

INSERT AND REMOVE INSTRUCTIONS

VOLUME 4, BASES	
DISCARD	INSERT
B 3.5-4	B 3.5-4
B 3.5-5	B 3.5-5
B 3.5-7	B 3.5-7
B 3.5-16	B 3.5-16
B 3.6-1 through B 3.6-5	B 3.6-1 through B 3.6-5
B 3.6-11 through B 3.6-13	B 3.6-11 through B 3.6-13
B 3.6-16	B 3.6-16
B 3.6-27	B 3.6-27
B 3.6-28	B 3.6-28
B 3.6-32	B 3.6-32
B 3.6-33	B 3.6-33
B 3.6-44	B 3.6-44
B 3.6-70 through B 3.6-73	B 3.6-70 through B 3.6-73
B 3.8-22 through B 3.8-33	B 3.8-22 through B 3.8-33
B 3.8-56	B 3.8-56
B 3.8-57	B 3.8-57
B 3.8-60	B 3.8-60
B 3.9-2 through B 3.9-4	B 3.9-2 through B 3.9-4
B 3.9-19	B 3.9-19
B 3.9-25	B 3.9-25
B 3.9-29	B 3.9-29
B 3.10-16	B 3.10-16
B 3.10-34	B 3.10-34

INSERT AND REMOVE INSTRUCTIONS

VOLUME 5 CURRENT TECHNICAL SPECIFICATION (CTS) COMPARISON DOCUMENT	
DISCARD	INSERT
CTS markup for Chapter 1.0 Page 5 of 19 through 7 of 19	CTS markup for Chapter 1.0 Page 5 of 19 through 7 of 19
Discussion of Changes ITS Chapter 1.0 Page 3	Discussion of Changes ITS Chapter 1.0 Page 3
CTS markup for Chapter 2.0 Page 1 of 6 through Page 6 of 6	CTS markup for Chapter 2.0 Page 1 of 5 through Page 5 of 5
Discussion of Changes ITS Chapter 2.0 Page 1	Discussion of Changes ITS Chapter 2.0 Page 1
Discussion of Changes ITS Chapter 2.0 Page 2	Discussion of Changes ITS Chapter 2.0 Page 2
CTS markup for Specification 3.1.3 Page 1 of 9	CTS markup for Specification 3.1.3 Page 1 of 9
Discussion of Changes ITS 3.1.3 Page 9	Discussion of Changes ITS 3.1.3 Page 9
Discussion of Changes ITS 3.1.3 Page 11	Discussion of Changes ITS 3.1.3 Page 11
Discussion of Changes ITS 3.1.7 Page 3	Discussion of Changes ITS 3.1.7 Page 3
CTS markup for Specification 3.3.1.1 Page 7 of 11	CTS markup for Specification 3.3.1.1 Page 7 of 11
CTS markup for Specification 3.3.1.1 Page 8 of 11	CTS markup for Specification 3.3.1.1 Page 8 of 11
Discussion of Changes ITS 3.3.1.1 Pages 3 through 7	Discussion of Changes ITS 3.3.1.1 Pages 3 through 7
Discussion of Changes ITS 3.3.1.1 Page 11	Discussion of Changes ITS 3.3.1.1 Page 11
Discussion of Changes ITS 3.3.1.1 Page 12	Discussion of Changes ITS 3.3.1.1 Page 12
Discussion of Changes ITS 3.3.2.1 Page 2	Discussion of Changes ITS 3.3.2.1 Page 2
Discussion of Changes ITS 3.3.2.1 Page 3	Discussion of Changes ITS 3.3.2.1 Page 3
Discussion of Changes ITS 3.3.2.2 Pages 2 through 4	Discussion of Changes ITS 3.3.2.2 Pages 2 through 4
Discussion of Changes ITS 3.3.2.2 Page 7	Discussion of Changes ITS 3.3.2.2 Page 7
Discussion of Changes ITS 3.3.3.1 Pages 2 through 8	Discussion of Changes ITS 3.3.3.1 Pages 2 through 8
CTS markup for Specification 3.3.3.2 Page 1 of 3	CTS markup for Specification 3.3.3.2 Page 1 of 3
CTS markup for Specification 3.3.3.2 Page 3 of 3	CTS markup for Specification 3.3.3.2 Page 3 of 3
Discussion of Changes ITS 3.3.3.2 Page 1 and 2	Discussion of Changes ITS 3.3.3.2 Page 1 through 7
Discussion of Changes ITS 3.3.4.1 Pages 2 through 4	Discussion of Changes ITS 3.3.4.1 Pages 2 through 4
CTS markup for Specification 3.3.4.2 Page 1 of 4	CTS markup for Specification 3.3.4.2 Page 1 of 4
CTS markup for Specification 3.3.4.2 Page 3 of 4	CTS markup for Specification 3.3.4.2 Page 3 of 4
Discussion of Changes ITS 3.3.4.2 Pages 1 through 4	Discussion of Changes ITS 3.3.4.2 Pages 1 through 4

INSERT AND REMOVE INSTRUCTIONS

VOLUME 5 CURRENT TECHNICAL SPECIFICATION (CTS) COMPARISON DOCUMENT	
DISCARD	INSERT
CTS markup for Specification 3.3.5.1 Page 1 of 12	CTS markup for Specification 3.3.5.1 Page 1 of 12
CTS markup for Specification 3.3.5.1 Page 12 of 12	CTS markup for Specification 3.3.5.1 Page 12 of 12
Discussion of Changes ITS 3.3.5.1 Page 3	Discussion of Changes ITS 3.3.5.1 Page 3
Discussion of Changes ITS 3.3.5.1 Pages 5 through 8	Discussion of Changes ITS 3.3.5.1 Pages 5 through 8
Discussion of Changes ITS 3.3.5.2 Pages 1 through 4	Discussion of Changes ITS 3.3.5.2 Pages 1 through 4
CTS markup for Specification 3.3.6.1 Page 6 of 12	CTS markup for Specification 3.3.6.1 Page 6 of 12
CTS markup for Specification 3.3.6.1 Page 7 of 12	CTS markup for Specification 3.3.6.1 Page 7 of 12
CTS markup for Specification 3.3.6.1 Page 9 of 12	CTS markup for Specification 3.3.6.1 Page 9 of 12
Discussion of Changes ITS 3.3.6.1 Page 3	Discussion of Changes ITS 3.3.6.1 Page 3
Discussion of Changes ITS 3.3.6.1 Page 5	Discussion of Changes ITS 3.3.6.1 Page 5
Discussion of Changes ITS 3.3.6.1 Pages 7 through 9	Discussion of Changes ITS 3.3.6.1 Pages 7 through 9
Discussion of Changes ITS 3.3.6.1 Pages 12 through 17	Discussion of Changes ITS 3.3.6.1 Pages 12 through 18
CTS markup for Specification 3.3.6.2 Page 4 of 8	CTS markup for Specification 3.3.6.2 Page 4 of 8
Discussion of Changes ITS 3.3.6.2 Pages 4 through 6	Discussion of Changes ITS 3.3.6.2 Pages 4 through 6
CTS markup for Specification 3.3.7.1 Page 2 of 4 through Page 4 of 4	CTS markup for Specification 3.3.7.1 Page 2 of 4 through Page 4 of 4
Discussion of Changes ITS 3.3.7.1 Pages 1 through 4	Discussion of Changes ITS 3.3.7.1 Pages 1 through 5
CTS markup for Specification 3.3.8.1 Page 1 of 5	CTS markup for Specification 3.3.8.1 Page 1 of 5
CTS markup for Specification 3.3.8.1 Page 3 of 5	CTS markup for Specification 3.3.8.1 Page 3 of 5
CTS markup for Specification 3.3.8.1 Page 5 of 5	CTS markup for Specification 3.3.8.1 Page 5 of 5
Discussion of Changes ITS 3.3.8.1 Pages 1 through 6	Discussion of Changes ITS 3.3.8.1 Pages 1 through 6
CTS markup for Specification 3.3.8.2 Page 1 of 1	CTS markup for Specification 3.3.8.2 Page 1 of 1
Discussion of Changes ITS 3.3.8.2 Pages 1 through 3	Discussion of Changes ITS 3.3.8.2 Pages 1 through 3
CTS markup for Specification 3.4.1 Page 11 of 11	CTS markup for Specification 3.4.1 Page 11 of 11
Discussion of Changes ITS 3.4.1 Page 4	Discussion of Changes ITS 3.4.1 Page 4
Discussion of Changes ITS 3.4.7 Page 1	Discussion of Changes ITS 3.4.7 Page 1
Discussion of Changes ITS 3.4.12 Page 2	Discussion of Changes ITS 3.4.12 Page 2

INSERT AND REMOVE INSTRUCTIONS

VOLUME 5 CURRENT TECHNICAL SPECIFICATION (CTS) COMPARISON DOCUMENT	
DISCARD	INSERT
Discussion of Changes ITS 3.4.12 Page 3	Discussion of Changes ITS 3.4.12 Page 3
VOLUME 6 CURRENT TECHNICAL SPECIFICATION (CTS) COMPARISON DOCUMENT	
DISCARD	INSERT
CTS markup for Specification 3.5.1 Page 1 of 6	CTS markup for Specification 3.5.1 Page 1 of 6
CTS markup for Specification 3.5.1 Page 3 of 6	CTS markup for Specification 3.5.1 Page 3 of 6
Discussion of Changes ITS 3.5-1 Page 2 through 7	Discussion of Changes ITS 3.5-1 Page 2 through 7
CTS markup for Specification 3.5.2 Page 2 of 5 through Page 5 of 5	CTS markup for Specification 3.5.2 Page 2 of 5 through Page 5 of 5
Discussion of Changes ITS 3.5.2 Page 2	Discussion of Changes ITS 3.5.2 Page 2
Discussion of Changes ITS 3.5.2 Page 3	Discussion of Changes ITS 3.5.2 Page 3
Discussion of Changes ITS 3.5.2 Page 5	Discussion of Changes ITS 3.5.2 Page 5
Discussion of Changes ITS 3.5.3 Page 1	Discussion of Changes ITS 3.5.3 Page 1
CTS markup for Specification 3.6.1.1 Page 1 of 9 through Page 9 of 9	CTS markup for Specification 3.6.1.1 Page 1 of 8 through Page 8 of 8
Discussion of Changes ITS 3.6.1.1 Page 1	Discussion of Changes ITS 3.6.1.1 Page 1
Discussion of Changes ITS 3.6.1.1 Page 2	Discussion of Changes ITS 3.6.1.1 Page 2
CTS markup for Specification 3.6.1.2 Page 1 of 2	CTS markup for Specification 3.6.1.2 Page 1 of 2
CTS markup for Specification 3.6.1.2 Page 2 of 2	CTS markup for Specification 3.6.1.2 Page 2 of 2
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CTS markup for Specification 3.6.1.3 Page 1 of 22 through Page 22 of 22	CTS markup for Specification 3.6.1.3 Page 1 of 21 through Page 21 of 21
Discussion of Changes ITS 3.6.1.3 Page 1	Discussion of Changes ITS 3.6.1.3 Page 1
Discussion of Changes ITS 3.6.1.3 Pages 3 through 8	Discussion of Changes ITS 3.6.1.3 Pages 3 through 8
CTS markup for Specification 3.6.1.8 Page 1 of 1	CTS markup for Specification 3.6.1.8 Page 1 of 1
Discussion of Changes ITS 3.6.1.8 Pages 2 through 4	Discussion of Changes ITS 3.6.1.8 Pages 2 through 3
CTS markup for Specification 3.6.3.2 Page 1 of 1	CTS markup for Specification 3.6.3.2 Page 1 of 1
Discussion of Changes ITS 3.6.3.2 Page 1	Discussion of Changes ITS 3.6.3.2 Page 1
CTS markup for Specification 3.6.4.1 Page 1 of 1	CTS markup for Specification 3.6.4.1 Page 1 of 1
Discussion of Changes ITS 3.6.4.1 Page 1	Discussion of Changes ITS 3.6.4.1 Page 1

INSERT AND REMOVE INSTRUCTIONS

VOLUME 6 CURRENT TECHNICAL SPECIFICATION (CTS) COMPARISON DOCUMENT	
DISCARD	INSERT
Discussion of Changes ITS 3.6.4.1 Page 2	Discussion of Changes ITS 3.6.4.1 Page 2
CTS markup for Specification 3.6.4.2 Page 3 of 3	CTS markup for Specification 3.6.4.2 Page 3 of 3
Discussion of Changes ITS 3.6.4.2 Page 3	Discussion of Changes ITS 3.6.4.2 Page 3
CTS markup for Specification 3.7.3 Page 1 of 3	CTS markup for Specification 3.7.3 Page 1 of 3
Discussion of Changes ITS 3.7.3 Page 1	Discussion of Changes ITS 3.7.3 Page 1
Discussion of Changes ITS 3.7.7 Page 1	Discussion of Changes ITS 3.7.7 Page 1
Discussion of Changes ITS 3.7.7 Page 2	Discussion of Changes ITS 3.7.7 Page 2
CTS markup for Specification 3.8.1 Page 4 of 9	CTS markup for Specification 3.8.1 Page 4 of 9
CTS markup for Specification 3.8.1 Page 6 of 9	CTS markup for Specification 3.8.1 Page 6 of 9
Discussion of Changes ITS 3.8.1 Page 4	Discussion of Changes ITS 3.8.1 Page 4
Discussion of Changes ITS 3.8.1 Page 6	Discussion of Changes ITS 3.8.1 Page 6
Discussion of Changes ITS 3.8.1 Pages 15 through 17	Discussion of Changes ITS 3.8.1 Pages 15 through 17
CTS markup for Specification 3.8.4 Page 2 of 4	CTS markup for Specification 3.8.4 Page 2 of 4
CTS markup for Specification 3.8.4 Page 3 of 4	CTS markup for Specification 3.8.4 Page 3 of 4
Discussion of Changes ITS 3.8.4 Pages 1 through 6	Discussion of Changes ITS 3.8.4 Pages 1 through 6
Discussion of Changes ITS 3.8.5 Page 1	Discussion of Changes ITS 3.8.5 Page 1
Discussion of Changes ITS 3.8.7 Page 2	Discussion of Changes ITS 3.8.7 Page 2
None	Discussion of Changes ITS 3.8.7 Page 3
Discussion of Changes ITS 3.8.8 Page 2	Discussion of Changes ITS 3.8.8 Page 2
Discussion of Changes ITS 3.8.8 Page 3	Discussion of Changes ITS 3.8.8 Page 3
Discussion of Changes ITS 3.9.1 Page 2	Discussion of Changes ITS 3.9.1 Page 2
Discussion of Changes ITS 3.9.1 Page 3	Discussion of Changes ITS 3.9.1 Page 3
Discussion of Changes ITS 3.9.2 Page 2	Discussion of Changes ITS 3.9.2 Page 2
Discussion of Changes ITS 3.9.2 Page 3	Discussion of Changes ITS 3.9.2 Page 3
Discussion of Changes ITS 3.9.3 Page 1	Discussion of Changes ITS 3.9.3 Page 1
Discussion of Changes ITS 3.9.3 Page 2	Discussion of Changes ITS 3.9.3 Page 2
Discussion of Changes ITS 3.9.4 Page 2	Discussion of Changes ITS 3.9.4 Page 2
None	Discussion of Changes ITS 3.9.4 Page 3

INSERT AND REMOVE INSTRUCTIONS

VOLUME 6 CURRENT TECHNICAL SPECIFICATION (CTS) COMPARISON DOCUMENT	
DISCARD	INSERT
Discussion of Changes ITS 3.9.6 Page 1	Discussion of Changes ITS 3.9.6 Page 1
None	Discussion of Changes ITS 3.9.6 Page 2
Discussion of Changes ITS 3.9.7 Page 2	Discussion of Changes ITS 3.9.7 Page 2
Discussion of Changes CTS 3/4.9.7 Page 1	Discussion of Changes CTS 3/4.9.7 Page 1
Discussion of Changes ITS 3.10.4 Pages 2 through 4	Discussion of Changes ITS 3.10.4 Pages 2 through 4
Discussion of Changes ITS 3.10.8 Page 2	Discussion of Changes ITS 3.10.8 Page 2
Discussion of Changes ITS 3/4.10.5 Page 1	Discussion of Changes CTS 3/4.10.5 Page 1
Discussion of Changes ITS 3/4.10.6 Page 1	Discussion of Changes CTS 3/4.10.6 Page 1
Discussion of Changes ITS 4.0 Page 1	Discussion of Changes ITS 4.0 Page 1
Discussion of Changes ITS 4.0 Page 3	Discussion of Changes ITS 4.0 Page 3
Discussion of Changes ITS 5.2 Page 4	Discussion of Changes ITS 5.2 Page 4
Discussion of Changes ITS 5.4 Page 1	Discussion of Changes ITS 5.4 Page 1
Discussion of Changes ITS 5.4 Page 2	Discussion of Changes ITS 5.4 Page 2
CTS markup for Specification 5.5 Page 1 of 17 through Page 17 of 17	CTS markup for Specification 5.5 Page 1 of 21 through Page 21 of 21
Discussion of Changes ITS 5.5 Pages 2 through 4	Discussion of Changes ITS 5.5 Pages 2 through 4
CTS markup for Specification 6.7 Page 1 of 1	CTS markup for Specification 6.7 Page 1 of 1
Discussion of Changes CTS 6.7 Page 1	Discussion of Changes CTS 6.7 Page 1
Discussion of Changes CTS 6.10 Page 1	Discussion of Changes CTS 6.10 Page 1
VOLUME 7, NO SIGNIFICANT HAZARDS CONSIDERATION	
DISCARD	INSERT
No Significant Hazards Evaluation ITS 3.3.4.2 Page 1	No Significant Hazards Evaluation ITS 3.3.4.2 Page 1
No Significant Hazards Evaluation ITS 3.3.8.1 Page 3	No Significant Hazards Evaluation ITS 3.3.8.1 Page 3
None	No Significant Hazards Evaluation ITS 3.3.8.1 Page 4
No Significant Hazards Evaluation ITS 3.5.1 Page 1	No Significant Hazards Evaluation ITS 3.5.1 Page 1
No Significant Hazards Evaluation ITS 3.6.1.3 Page 11	No Significant Hazards Evaluation ITS 3.6.1.3 Page 11
No Significant Hazards Evaluation ITS 3.6.3.2 Page 1	No Significant Hazards Evaluation ITS 3.6.3.2 Page 1
No Significant Hazards Evaluation ITS 3.9.1 Page 1	No Significant Hazards Evaluation ITS 3.9.1 Page 1

INSERT AND REMOVE INSTRUCTIONS

VOLUME 7, NO SIGNIFICANT HAZARDS CONSIDERATION	
DISCARD	INSERT
No Significant Hazards Evaluation ITS 3.9.2 Page 4	No Significant Hazards Evaluation ITS 3.9.2 Page 4
No Significant Hazards Evaluation ITS 3.9.2 Page 5	No Significant Hazards Evaluation ITS 3.9.2 Page 5
No Significant Hazards Evaluation ITS 3.9.3 Page 2	No Significant Hazards Evaluation ITS 3.9.3 Page 2
No Significant Hazards Evaluation ITS 3.9.6 Page 1	No Significant Hazards Evaluation ITS 3.9.6 Page 1
No Significant Hazards Evaluation ITS 3.9.7 Page 2	No Significant Hazards Evaluation ITS 3.9.7 Page 2
No Significant Hazards Evaluation ITS 3.10.8 Page 1	No Significant Hazards Evaluation ITS 3.10.8 Page 1
No Significant Hazards Evaluation ITS 3/4.10.5 Page 1	No Significant Hazards Evaluation CTS 3/4.10.5 Page 1
No Significant Hazards Evaluation ITS 3/4.10.6 Page 1	No Significant Hazards Evaluation CTS 3/4.10.6 Page 1
VOLUME 8, DEVIATIONS FROM NUREG-1434 (TECHNICAL SPECIFICATIONS)	
DISCARD	INSERT
1.1-2 through 1.1-5	1.1-2 through 1.1-5
Justification fpr Deviations Chapter 1.0 Page 1	Justification for Deviations Chapter 1.0 Page 1
2.0-1	2.0-1
2.0-2	2.0-2
Justification for Deviations Chapter 2.0 Page 1	Justification for Deviations Chapter 2.0 Page 1
3.1-17	3.1-17
3.3-4	3.3-4
3.3-25	3.3-25
Page 3.3-40 through 3.3-45	Page 3.3-40 through 3.3-45
3.3-56	3.3-56
3.3-61	3.3-61
3.3-81 through 3.3-85	3.3-81 through 3.3-85
Justification for Deviations Section 3.3 Pages 3 through 6	Justification for Deviations Section 3.3 Pages 3 through 7
3.4-2	3.4-2
3.4-9	3.4-9
3.4-11	3.4-11

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VOLUME 8, DEVIATIONS FROM NUREG-1434 (TECHNICAL SPECIFICATIONS)	
DISCARD	INSERT
3.4-13	3.4-13
3.4-26	3.4-26
Justification for Deviations Section 3.4 Page 2	Justification for Deviations Section 3.4 Page 2
3.5-1	3.5-1
3.6-2	3.6-2
3.6-7	3.6-7
3.6-13	3.6-13
3.6-17	3.6-17
3.6-18	3.6-18
Insert Page 3.6-41a	Insert Page 3.6-41a
Insert Page 3.6-41b	Insert Page 3.6-41b
Justification for Deviations Section 3.6 Pages 1 through 6	Justification for Deviations Section 3.6 Pages 1 through 7
3.8-15	3.8-15
3.8-20	3.8-20
3.8-21	3.8-21
3.8-24	3.8-24
3.8-25	3.8-25
3.8-28	3.8-28
Insert Page for 3.8-28	Insert Page for 3.8-28
3.8-30	3.8-30
Justification for Deviations Section 3.8 Page 4	Justification for Deviations Section 3.8 Page 4
Justification for Deviations Section 3.8 Page 5	Justification for Deviations Section 3.8 Page 5
3.9-1	3.9-1
Justification for Deviations Section 3.9 Page 1	Justification for Deviations Section 3.9 Page 1
3.10-9	3.10-9
Justification for Deviations Section 3.10 Page 1	Justification for Deviations Section 3.10 Page 1
5.0-12	5.0-12

INSERT AND REMOVE INSTRUCTIONS

VOLUME 8, DEVIATIONS FROM NUREG-1434 (TECHNICAL SPECIFICATIONS)	
DISCARD	INSERT
5.0-14	5.0-14
5.0-15	5.0-15
5.0-17	5.0-17
None	Insert Page 5.0-17
5.0-19	5.0-19
Insert Page 5.0-24a	Insert Page 5.0-24a
Insert Page 5.0-24b	Insert Page 5.0-24b
Insert Page 5.0-25a	Insert Page 5.0-25a
Insert Page 5.0-25b	Insert Page 5.0-25b
Justification for Deviations Chapter 5.0 Page 3	Justification for Deviations Chapter 5.0 Page 3
Justification for Deviations Chapter 5.0 Page 4	Justification for Deviations Chapter 5.0 Page 4
VOLUME 9, DEVIATIONS FROM NUREG-1434 (BASES)	
DISCARD	INSERT
B 2.0-6	B 2.0-6
B 2.0-7	B 2.0-7
B 2.0-9 through B 2.0-11	B 2.0-9 through B 2.0-11
Justification for Deviations from Bases Chapter 2.0 Page 1	Justification for Deviations from Bases Chapter 2.0 Page 1
B 3.0-13	B 3.0-13
None	Insert Page B 3.0-13
Justification for Deviations from Bases Section 3.0 Page 1	Justification for Deviations from Bases Section 3.0 Page 1
B 3.2-15	B 3.2-15
B 3.3-4	B 3.3-4
B 3.3-28	B 3.3-28
B 3.3-69	B 3.3-69
B 3.3-127	B 3.3-127
B 3.3-128	B 3.3-128

INSERT AND REMOVE INSTRUCTIONS

VOLUME 9, DEVIATIONS FROM NUREG-1434 (BASES)	
DISCARD	INSERT
B 3.3-237	B 3.3-237
NONE	Insert Page B 3.3-237
B 3.3-239	B 3.3-239
B 3.3-241	B 3.3-241
B 3.3-242	B 3.3-242
B 3.3-244 through B 3.3-246	B 3.3-244 through B 3.3-246
B 3.4-5	B 3.4-5
B 3.4-24	B 3.4-24
B 3.4-30	B 3.4-30
B 3.4-31	B 3.4-31
B 3.4-37	B 3.4-37
B 3.4-45	B 3.4-45
B 3.4-47	B 3.4-47
B 3.4-50	B 3.4-50
B 3.4-58	B 3.4-58
Justification for Deviations from Bases Section 3.4 Page 1	Justification for Deviations from Bases Section 3.4 Page 1
VOLUME 10, DEVIATIONS FROM NUREG-1434 (BASES)	
DISCARD	INSERT
B 3.5-4	B 3.5-4
B 3.5-6	B 3.5-6
B 3.5-7	B 3.5-7
B 3.5-14	B 3.5-14
B 3.6-2	B 3.6-2
B 3.6-4	B 3.6-4
B 3.6-5	B 3.6-5
B 3.6-12	B 3.6-12
B 3.6-14	B 3.6-14

INSERT AND REMOVE INSTRUCTIONS

VOLUME 10, DEVIATIONS FROM NUREG-1434 (BASES)	
DISCARD	INSERT
B 3.6-17	B 3.6-17
B 3.6-30 through B 3.6-32	B 3.6-30 through B 3.6-32
B 3.6-43	B 3.6-43
B 3.6-44	B 3.6-44
Insert Page for B 3.6-47i	Insert Page for B 3.6-47i
Insert Page for B 3.6-86a through B 3.6-86f	Insert Page for B 3.6-86a through B 3.6-86f
Justification for Deviations from Bases Section 3.6 Page 2	Justification for Deviations from Bases Section 3.6 Page 2
B 3.8-22	B 3.8-22
Insert Page for B 3.8-22	Insert Page for B 3.8-22
B 3.8-23	B 3.8-23
Insert Page for B 3.8-23	Insert Page for B 3.8-23
B 3.8-28	B 3.8-28
Insert Page for B 3.8-28	Insert Page for B 3.8-28
B 3.8-50	B 3.8-50
B 3.8-56	B 3.8-56
Insert Page for B 3.8-56	Insert Page for B 3.8-56
B 3.8-59	B 3.8-59
B 3.9-2	B 3.9-2
B 3.9-3	B 3.9-3
B 3.9-19	B 3.9-19
B 3.9-25	B 3.9-25
B 3.9-29	B 3.9-29
Insert Page for B 3.10-10	Insert Page for B 3.10-10
B 3.10-18	B 3.10-18
B 3.10-36	B 3.10-36

INSERT AND REMOVE INSTRUCTIONS

VOLUME 10, DEVIATIONS FROM NUREG-1434 (BASES)	
DISCARD	INSERT
B 3.10-37	B 3.10-37
Justification for Deviations from Bases Section 3.10 Page 1	Justification for Deviations from Bases Section 3.10 Page 1

RELOCATED ITEMS

ITS	DOC	Current Tech Spec	New Location (Revision A)
1.0	LA.1	1.15	Bases 3.2.4
	LA.2	1.31a	Bases 3.6.1.1 and 3.6.1.2
2.0	LA.1	2.1.4	plant procedures (EOPs)
	LA.2	6.7.1.b	plant procedures
3.1.2	LA.1	3.1.2.action a	Bases
3.1.3	LA.1	3.1.3.1.a.1.b.1 & 2, 3.1.3.1.b.2.a & b, 3.1.3.7.a.3.b	Bases
	LA.2	3.1.3.7.a.1 & 2	Bases
3.1.4	LA.1	4.1.3.2.c	Bases
3.1.5	LA.1	3.1.3.5.a.2.b.1 & 2	Bases
	LC.1	4.1.3.5.b	plant procedures
3.1.7	LA.1	4.1.5.d	plant procedures
	LA.2	4.1.5.d.1	Bases
	LA.3	4.1.5.d.1, 4.1.5.d.3	Bases
	LA.4	4.1.5.d.2	IST Program
	LA.5	Figure 3.1.5-2	Bases and FSAR
NA	LA.1	3/4.1.6	COLR
3.2.1,2,3,4	LA.1	3.2.1.a, 3.2.3.a, 3.2.4.a, 3.2.2.a	Bases
3.2.4	R.1	3.2.2.a	LCS
	LA.2	4.2.2.*	plant procedures
3.3.1.1	LA.1	4.3.1.2, Table 4.3.1.1-1	Bases
	LA.2	4.3.1.3.* & **	Bases
	LA.3	Table 3.3.1-1.1.a, Table 3.8.1-1.b, Table 3.3.1-1.*	plant procedures
	LA.4	Table 3.3.1-1.2, Table 3.3.1-1.c	Bases

RELOCATED ITEMS

ITS	DOC	Current Tech Spec	New Location (Revision A)
3.3.1.1	LA.5	Table 3.3.1-1.5,6,8,9 Table 3.3.1-1.e Table 3.3.1-1.d Table 3.3.1-1.g Table 3.3.1-1.i Table 3.3.1-1.j	FSAR
	LA.6	Table 4.3.1.1-1.h	plant procedures
	LA.7	2.2, Table 3.3.1.1-1	plant procedures
3.3.1.2	LA.1	4.3.7.6.c	Bases
	LA.2	3.9.2.a, 4.9.2.a.2	Bases
	LA.3	3.9.2.d, 4.9.2.d	plant procedures
3.3.2.1	LA.1	3.3.6, 3.3.6.a, Table 3.3.6-2.1, 3.3.4.1	plant procedures
	R.1	Table 3.3.6-1 Table 4.3.6-1 Table 3.3.6.2	LCS
	LA.2	Table 3.3.6-1	FSAR
	LA.3	Table 3.3.6-1, 4.1.4.a,b,c	Bases
3.3.2.2	LA.1	3.3.9, Table 3.3.9-2	plant procedures
3.3.3.1	R.1	Table 3.3.7.5-1, Table 4.3.7.5-1	FSAR
	LA.1	Table 3.3.7.5-1	Bases
	LA.2	Table 4.3.7.5-1	Bases
3.3.3.2	LA.1	3.3.7.4, 3.3.2.4.a, 4.3.7.4, Table 3.3.7.1-1, Table 4.3.7.4-1	LCS and Bases
3.3.4.1	LA.1	3.3.4.2, 3.3.4.2.a, Table 3.3.4.2-2	plant procedures
	LA.2	3.3.4.2, 4.3.4.2.3, Table 3.3.4.2-3	LCS
	LA.3	Table 3.3.4.2-1	FSAR

RELOCATED ITEMS

ITS	DOC	Current Tech Spec	New Location (Revision A)
3.3.4.2	LA.1	3.3.4.1, 3.3.4.1.a, Table 3.3.4.1-2	plant procedures
3.3.5.1	LA.1	3.3.3, 3.3.3.a, Table 3.3.3-2	plant procedures
	LA.2	4.3.3.2	Bases
	LA.3	Table 3.3.3-1, Table 3.3.3-2, Table 4.3.3.1-1	Bases
	R.1	Table 4.3.3.1-1,2.f	FSAR
3.3.5.2	LA.1	3.3.5, 3.3.5.a, Table 3.3.5-2	plant procedures
	LA.2	4.3.5.2	Bases
	LA.3	Table 3.3.5-1, Table 3.3.5-2	Bases
3.3.6.1	R.1	Table 3.3.2-1.h, Table 3.3.2-2.h Table 4.3.2.1-1.h	FSAR
	LA.1	3.3.2, 3.3.2.a, Table 3.3.2-2	plant procedures
	LA.2	3.3.2.b.1, 3.3.2.b.2, 3.3.2.b.2.c	Bases
	LA.3	3.3.2.*	Bases
	LA.4	4.3.2.2	Bases
	LA.5	Table 3.3.2-1	Bases
	LA.6	Table 4.3.2.1-1	plant procedures
	LA.7	Table 3.3.2-1.i	plant procedures
3.3.6.2	LA.1	3.3.2, 3.3.2.a, Table 3.3.2-2	plant procedures
	LA.2	3.3.2.b.1, 3.3.2.b.2, 3.3.2.b.2.b	Bases
	LA.3	3.3.2.*	Bases
	LA.4	4.3.3.2	Bases
	LA.5	Table 3.3.2-1	Bases

RELOCATED ITEMS

ITS	DOC	Current Tech Spec	New Location (Revision A)
3.3.7.1	LA.1	3.3.7.1-1	plant procedures
3.3.8.1	LA.1	3.3.3, 3.3.3.a, Table 3.3.8.1-1	plant procedures
3.3.8.1	LA.2	4.3.3.2	Bases
	LA.3	Table 3.3.8.1-1	Bases
	LA.4	Table 3.3.8.1-1	plant procedures
3/4.3.7.1 CTS	R.1	3.3.7.1, 3.3.7.1-1, 4.3.7.1, Table 3.3.7.1-1	FSAR
3/4.3.7.3 CTS	R.1	3.3.7.3, 4.3.7.3, Table 3.3.7.3-1	FSAR
3/4.3.7.7 CTS	R.1	3.3.7.7, 4.3.7.7	FSAR
3/4.3.7.10 CTS	R.1	3.3.7.10, 4.3.7.10	FSAR
3/4.3.7.12 CTS	R.1	3.3.7.12, 4.3.7.12, Table 3.3.7.12-1	a: plant procedures b: FSAR Action = plant procedures
3/4.3.8 CTS	R.1	3.3.8, 4.3.8.1, 4.3.8.2	LCS
3.4.1	LA.1	3.4.1.1.2	Bases
	LA.2	3.4.1.1.2, 3.2.7, 3.2.7.b, 3.2.8.a, 3.2.8.b	Bases
	LA.3	3.4.1.1.3.a, 3.4.1.1.3.d, 4.4.1.1.1.a, 4.4.1.1.1.b	plant procedures and FSAR
	LA.4	3.4.1.1.2, 4.4.1.1.1.c, Figure 3.4.1.1-1, 3.2.6, 4.2.6, Figure 3.2.6-1, 3.2.7, Figure 3.2.7-1, 3.2.8, Figure 3.2.8-1	COLR
	LA.5	3.2.6	Bases
	LA.6	3.2.7, 3.2.7.a, 3.2.8, 3.2.8.a	Bases
	LA.7	3.2.7.a, 3.2.7.b, 3.2.8.a, 3.2.8.b	Bases
3.4.4	LA.1	3.4.2.*	Bases

RELOCATED ITEMS

ITS	DOC	Current Tech Spec	New Location (Revision A)
3.4.5	LA.1	3.4.2.*	Bases
3.4.6	LA.1	4.4.3.2.1.a & b	Bases
3.4.7	LA.1	3.4.3.2.e, 4.4.3.2.2, Table 3.4.3.2-1	LCS
3.4.7	LA.2	4.4.3.2.2.a	IST Plan
	LC.1	3.4.3.2.Action d, 4.4.3.2.3, Table 3.4.3.2-2	LCS
3.4.9	LA.1	Table 4.4.5-1	plant procedures
3.4.10	LA.1	3.4.9.1.a & b	Bases
3.4.11	LA.1	3.4.9.2.a & b	Bases
3.4.12	LA.2	4.4.1.1.2.***	Bases
	LA.3	3.4.1.4.b, 3.4.1.4.action	plant procedures
3/4.4.4 CTS	R.1	3.4.4, 4.4.4, Table 3.4.4-1	plant procedures
3/4.4.8 CTS	R.1	3.4.8, 4.4.8	FSAR
3.5.1	LA.1	3.5.1.a.1 & 2, 3.5.1.b.1, 3.5.1.c	Bases
	LA.2	4.5.1.a.1 & 2, 4.5.1.b.1-3, 4.5.1.c, 4.5.1.d, 4.5.1.e.3.b	Bases
	LC.1	4.5.1.e.2, 4.5.1.e.3.c	plant procedures
	LC.2	4.5.1.e.3.d	plant procedures
3.5.2	LA.1	3.5.2, 3.5.3.b.4	Bases
	LA.2	3.5.2, 3.5.3.b.3	Bases
3.5.3	LA.1	3.7.3	Bases
	LA.2	4.7.3.a.1, 4.7.3.a.3, 4.9.3.c.1, 4.7.3.c.3	Bases
3.6.1.1	LA.1	3.6.1.2.b, 4.6.1.2.*	LCS
3.6.1.2	LA.1	3.6.1.3.b	Bases

RELOCATED ITEMS

ITS	DOC	Current Tech Spec	New Location (Revision A)
3.6.1.3	LA.1	3.6.3, 3.6.3.a, 3.6.3.b, 4.6.3.1, 4.6.3.2, 4.6.3.3, 4.6.3.4, Table 3.6.3.1, 4.6.1.1.b	LCS
	LA.2	4.6.3.5.b	Bases
	LA.3	4.6.1.1.**	plant procedures
3.6.1.4	LA.1	4.6.1.7	Bases
3.6.1.5	R.1	3.6.2.2.Action a & b, 4.6.2.2, 4.6.2.2.b	LCS
	LA.1	3.6.2.2	Bases
	LA.2	4.6.2.2.c	Bases
3.6.1.6	LA.1	3.6.4.2	Bases
	LA.2	4.6.4.2.b.2.b	plant procedures
3.6.1.7	LA.1	3.6.4.1	Bases
3.6.1.8	LA.1	3.6.1.4	Bases
	LA.2	4.6.1.4.a.1 & 2, 4.6.1.4.c	Bases
	LA.3	4.6.1.4.b	IST Program
	LC.1	4.6.1.4.d	plant procedures
3.6.2.1	LA.1	3.6.2.1.Action b.2.b	plant procedures
3.6.2.2	LA.1	3.6.2.1.a.1, 3.5.3.a	Bases
3.6.2.3	LA.1	3.6.2.3	Bases
3.6.3.1	LA.1	3.6.6.1	Bases
	LA.2	4.6.6.1.b.2, 4.6.6.1.b.3, 4.6.6.1.b.4	Bases
	LC.1	4.6.6.1.b.1	plant procedures
3.6.4.2	LA.1	3.6.5.2, 3.6.5.2.Action, Table 3.6.5.2-1	LCS
3.6.4.3	LA.1	3.6.5.3	Bases
	LA.2	4.6.5.3.a	Bases
3.7.1	LA.1	3.7.1.1, 3.7.1.3	Bases

RELOCATED ITEMS

ITS	DOC	Current Tech Spec	New Location (Revision A)
3.7.1	LA.2	3.7.1.1, 3.7.1.1.Action b, c & d, 3.7.1.1.*, 3.7.1.3, 3.7.1.3.Action b & c, 3.7.1.3.*	Bases
3.7.2	LA.1	3.7.2.1	Bases
	LA.2	3.7.1.2, 3.7.1.2.Action	Bases
3.7.3	LA.1	3.7.2	Bases
3.7.3	LA.2	4.7.2.b	Bases
3.7.5	LA.1	3.11.2.7, 4.11.2.7.2, 4.11.2.7.2.b	Bases
	LA.2	4.11.2.7.1	ODCM
3.7.6	LA.1	4.7.9.b.1, 4.7.9.b.2	Bases and plant procedures
	LA.2	4.7.9.b.3	LCS
3.7.7	LA.1	3.9.9.Action	plant procedures and FSAR
	LA.2	3.9.9.Action	Bases
3/4.7.4 CTS	LA.1	3.7.4, 4.7.4, Table 4.7-1, Figure 4.7-1	LCS
3/4.7.5 CTS	R.1	3.7.5, 4.7.5.1, 4.7.5.2, 4.7.5.3	plant procedures
3/4.7.8 CTS	R.1	3.7.8, 4.7.8, Table 3.7.8-1	LCS
3.8.1	LA.1	3.8.1.1.a, 3.8.1.1.b	Bases
	LA.2	4.8.1.1.2.a, Table 4.8.1.1.2-1	plant procedures
	LA.3	4.8.1.1.2.a.4, 4.8.1.1.2.a.6	plant procedures
	LA.4	4.8.1.1.2.e.1	plant procedures
	LA.5	4.8.1.1.2.e.2, 4.8.1.1.2.e.9	Bases
	LA.6	4.8.1.1.2.e.4.2, 4.8.1.1.2.e.6.a.2, 4.8.1.1.2.e.6.b.2	Bases
	LA.7	4.8.1.1.2.e.8	plant procedures
	LA.8	4.8.1.1.2.e.13	plant procedures

RELOCATED ITEMS

ITS	DOC	Current Tech Spec	New Location (Revision A)
3.8.2	LA.1	3.8.1.2.Action a	plant procedures
3.8.3	LA.1	4.8.1.1.2.g	plant procedures
3.8.4	LA.1	3.8.2.1.a.1, 2, 4 & 5, 3.8.2.1.b.1 & 3, 3.8.2.1.c	Bases
	LA.2	3.8.2.1.a.3 & 6, 3.8.2.1.b.2 & 4, 4.8.2.1, 4.8.2.1.b, 4.8.2.1.b.3, 4.8.2.1.c.4.1, 4.8.2.1.d.2	plant procedures
3.8.4	LA.3	4.8.2.1.b.2, 4.8.2.1.c.3	Bases
3.8.4	LA.4	4.8.2.1.c.4.2	Bases
	LA.5	4.8.2.1.d.1 & 2	FSAR
	LA.6	4.8.2.1.f	Bases
3.8.5	LA.1	3.8.2.2, 3.8.2.2.a.1, 2, 4 & 5, 3.8.2.2.b.1 & 3, 3.8.2.2.c	Bases
	LA.2	3.8.2.2.a.3 & 6, 3.8.2.2.b.2 & 4	plant procedures
3.8.6	LA.1	4.8.2.1, 4.8.2.1.b, 4.8.2.1.b.3	plant procedures
	LA.2	4.8.2.1.b.3	Bases
3.8.7	LA.1	3.8.3.1, 3.8.3.1.a, 3.8.3.1.b.1.a - g & i, 3.8.3.1.b.2.a - e, 3.8.3.1.b.3	Bases
	LA.2	3.8.3.1.b.1.h, 3.8.3.1.b.2.f	plant procedures
	LA.3	4.8.3.1	Bases
3.8.8	LA.1	3.8.3.2.a.1-3, 3.8.3.2.b.1-3	Bases
	LA.2	4.8.3.2	Bases
3/4.8.4.1 CTS	R.1	3.8.4.1, 4.8.4.1	plant procedures
3/4.8.4.2 CTS	R.1	3.8.4.2, 4.8.4.2, Table 3.8.4.2-1	FSAR
3/4.8.4.3 CTS	R.1	3.8.4.3, 4.8.4.3, Table 3.8.4.3-1	FSAR
3.9.5	LC.1	4.1.3.5.b.1	plant procedures

RELOCATED ITEMS

ITS	DOC	Current Tech Spec	New Location (Revision A)
3.9.6	LA.1	3.9.8.Action	Bases
3.9.7	LA.1	3.9.8.Action	Bases
3.9.8	LA.1	3.9.11.1.a & b	Bases
	LA.2	4.9.11.1	Bases
3.9.9	LA.1	3.9.11.2.a & b	Bases
	LA.2	4.9.11.2	Bases
3/4.9.4 CTS	R.1	3.9.4, 4.9.4	plant procedures
3/4.9.5 CTS	R.1	3.9.5, 4.9.5	plant procedures
3/4.9.6 CTS	R.1	3.9.6, 4.9.6	LCS
3/4.9.7 CTS	R.1	3.9.7, 4.9.7, Figure 3.9.7-1	FSAR and plant procedures
3.10.1	LA.1	3.10.7	plant procedures
3.10.2	LA.1	Table 1.2, 4.9.1.2.*	Bases
3.10.4	LA.1	3.9.10.1.d, 4.9.10.1.d	Bases
3.10.5	LA.1	3.9.10.1.d, 4.9.10.1.d	Bases
4.0	LA.1	5.1.2, 5.1.3, 5.4	FSAR
	LA.2	5.2, 5.3.1	FSAR
	LA.3	5.3.1	FSAR
	LA.4	5.5	FSAR
5.2	LA.1	6.2.1.e	FSAR (OQAPD)
	LA.2	6.2.2.a, Table 6.2.2-1	FSAR
	LA.3	6.2.2.c, 6.2.2.*	plant procedures
	LA.3		Fire Protection Plan (FSAR)
	LA.4	6.2.2.d	plant procedures
	LA.5	6.2.2.f	FSAR

RELOCATED ITEMS

ITS	DOC	Current Tech Spec	New Location (Revision A)
5.2	LA.6	6.2.3	FSAR (OQAPD)
5.3	LA.1	6.3.1	FSAR
5.4	LA.1	6.8.2, 6.8.3	FSAR (OQAPD)
5.5	LA.1	6.8.4.b	FSAR
			Training Program
			plant Chemistry and HP procedures
	LA.2	6.8.4.e	ODCM
	LA.3	5.7.1, Table 5.7.1-1	FSAR
	LA.4	4.0.5, 4.0.5.a, 4.0.5.b, 4.0.5.c, 4.0.5.d, 4.0.5.f	ISI Program
	LA.5	4.0.5.a	IST Program
	LA.6	4.6.5.3.b.2 and c 4.7.2.c.2 and d	plant procedures
	LA.7	3.11.1.4, 4.11.1.4, 3.11.2.6, 4.11.2.6	plant procedures
	LA.8	4.8.1.1.2.c and d	Bases
5.6	LA.1	6.9.1.1, 6.9.1.2, 6.9.1.3	FSAR
CTS 6.4	LA.1	6.4	FSAR
CTS 6.5	LA.1	6.5	FSAR (OQAPD)
CTS 6.6	LA.1	6.6.1.a	plant procedures
	LA.2	6.6.1.b	FSAR (OQAPD)
CTS 6.10	LA.1	6.10	FSAR
CTS 6.11	LA.1	6.11	FSAR
CTS 6.13	LA.1	6.13, 1.33	FSAR

RELOCATED ITEMS

Control Process for the documents:

Document	Process
Bases	Bases Control Program (ITS 5.5)
FSAR	10CFR50.59
OQAPD	10CFR50.54(a)(3)
Procedures	10CFR50.59
IST Program	10CFR50.55a(f)
COLR	10CFR50.59
LCS	10CFR50.59
ODCM	ITS 5.5

FSAR REFERENCE

Spec #	DOC	CTS #	New Location (from submittal DOC)	FSAR reference
2.0	LA.1	2.1.4	plant procedures (EOPs)	6.2, 6.3, 15.6.4, 15.6.5, 15.6.6
	LA.2	6.7.1.b	plant procedures	13.4.1
3.1.5	LC.1	4.1.3.5.b	plant procedures	3.1.2.3.2.1
3.1.7	LA.1	4.1.5.d	plant procedures	Table 9.3-3(b)
3.2.4	LA.2	4.2.2.*	plant procedures	7.2.2.3
3.3.1.1	LA.3	Table 3.3.1-1.1.a, Table 3.3.1-1.Note (b)	plant procedures	7.2.1.1
	LA.6	Table 4.3.1.1-1.h	plant procedures	Table 7.2-5
	LA.7	2.2, Table 3.3.1.1-1	plant procedures	7.2.1.2
3.3.1.2	LA.3	3.9.2.d, 4.9.2.d	plant procedures	7.2.1.1
3.3.2.1	LA.1	3.3.6, 3.3.6.a, Table 3.3.6-2.1, 3.3.4.1	plant procedures	7.7.1.2
3.3.2.2	LA.1	3.3.9, Table 3.3.9-2	plant procedures	6.A.3.1.1.2
3.3.4.1	LA.1	3.3.4.2, 3.3.4.2.a, Table 3.3.4.2-2	plant procedures	7.6.1.5
3.3.4.2	LA.1	3.3.4.1, 3.3.4.1.a, Table 3.3.4.1-2	plant procedures	7.4.1.5
3.3.5.1	LA.1	3.3.3, 3.3.3.a, Table 3.3.3-2	plant procedures	3.1.2.4

FSAR REFERENCE

Spec #	DOC	CTS #	New Location (from submittal DOC)	FSAR reference
3.3.5.2	LA.1	3.3.5, 3.3.5.a, Table 3.3.5-2	plant procedures	3.6.1.18
3.3.6.1	LA.1	3.3.2, 3.3.2.a, Table 3.3.2-2	plant procedures	3.6.1.18
	LA.6	Table 4.3.2.1-1	plant procedures	7.3.1.1.2
	LA.7	Table 3.3.2-1.i	plant procedures	7.4.1.4
3.3.6.2	LA.1	3.3.2, 3.3.2.a, Table 3.3.2-2	plant procedures	15.6.5 15.7.4
3.3.7.1	LA.1	3.3.7.1-1	plant procedures	3.1.2.2.10.1
3.3.8.1	LA.1	3.3.3, 3.3.3.a, Table 3.3.8.1-1	plant procedures	6.2.1.1
	LA.4	Table 3.3.8.1-1	plant procedures	8.3.1.1.5
3.4.1	LA.3	3.4.1.1.3.a, 3.4.1.1.3.d, 4.4.1.1.1.a, 4.4.1.1.1.b	plant procedures and FSAR	6.A.1
3.4.9	LA.1	Table 4.4.5-1	plant procedures	11.3.2.4.5
3.4.12	LA.3	3.4.1.4.b, 3.4.1.4.action	plant procedures	6.A.1
3/4.4.4 CTS	R.1	3.4.4, 4.4.4, Table 3.4.4-1	plant procedures	3.11.5.1
3.5.1	LC.2	4.5.1.e.3.d	plant procedures	6.3.2.2
	LC.1	4.5.1.e.2, 4.5.1.e.3.c	plant procedures	Table 6.2-16
3.6.1.3	LA.3	4.6.1.1.**	plant procedures	3.6.2.5.4.8.a

FSAR REFERENCE

Spec #	DOC	CTS #	New Location (from submittal DOC)	FSAR reference
3.6.1.6	LA.2	4.6.4.2.b.2.b	plant procedures	6.2.1.1.4
3.6.1.8	LC.1	4.6.1.4.d	plant procedures	7.3.1.1.3
3.6.2.1	LA.1	3.6.2.1.Action b.2.b	plant procedures	1.2.2.4
3.6.3.1	LC.1	4.6.6.1.b.1	plant procedures	6.2.5
3.7.7	LA.1	3.9.9.Action	plant procedures and FSAR	9.1.2.3.3
3/4.7.5 CTS	R.1	3.7.5, 4.7.5.1, 4.7.5.2, 4.7.5.3	plant procedures	12.3.1.4.1
3.8.1	LA.3	4.8.1.1.2.a.4, 4.8.1.1.2.a.6	plant procedures	Chapter 8
	LA.4	4.8.1.1.2.e.1	plant procedures	Note 1
	LA.7	4.8.1.1.2.e.8	plant procedures	8.3.1.2.2
	LA.8	4.8.1.1.2.e.13	plant procedures	Note 1
3.8.2	LA.1	3.8.1.2.Action a	plant procedures	9.1.4.2.2.2
3.8.3	LA.1	4.8.1.1.2.g	plant procedures	8.3.1.1.8.2
3.8.4	LA.2	3.8.2.1.a.3 & 6, 3.8.2.1.b.2 & 4, 4.8.2.1, 4.8.2.1.b, 4.8.2.1.b.3, 4.8.2.1.c.4.1, 4.8.2.1.d.2	plant procedures	7.2.1.1
3.8.5	LA.2	3.8.2.2.a.3 & 6, 3.8.2.2.b.2 & 4	plant procedures	7.2.1.1
3.8.6	LA.1	4.8.2.1, 4.8.2.1.b, 4.8.2.1.b.3	plant procedures	8.3.2.1.7.1

Note 1: FSAR revision will be required

FSAR REFERENCE

Spec #	DOC	CTS #	New Location (from submittal DOC)	FSAR reference
3.8.7	LA.2	3.8.3.1.b.1.h, 3.8.3.1.b.2.f	plant procedures	8.3.2.1.3
3/4.8.4.1 CTS	R.1	3.8.4.1, 4.8.4.1	plant procedures	3.8.2.2.4.7
3/4.8.4.3 CTS	R.1	3.8.4.3, 4.8.4.3	plant procedures	8.3.1.1.10
3.9.5	LC.1	4.1.3.5.b.1	plant procedures	3.1.2.3.2.1
3/4.9.4 CTS	R.1	3.9.4, 4.9.4	plant procedures	9.1.4.2
3/4.9.5 CTS	R.1	3.9.5, 4.9.5	plant procedures	9.5.2.1
3/4.9.7 CTS	R.1	3.9.7, 4.9.7, Figure 3.9.7-1	FSAR and plant procedures	9.1.2.3.3
3.10.1	LA.1	3.10.7	plant procedures	LCO 3.4.12
5.2	LA.3	6.2.2.c, 6.2.2.*	plant procedures	13.1.2.2.5
	LA.4	6.2.2.d	plant procedures	13.1.2.2.5
5.5	LA.6	4.6.5.3.b.2 and c 4.7.2.c.2 and d	plant procedures	6.4, 6.5.1, 9.4.1, 15.6.5, 15.7.4
	LA.7	3/4.11.1.4, 3/4.11.2.6	plant procedures	10.4.2.4
CTS 6.6	LA.1	6.6.1.a	plant procedures	13.4.1

SURVEILLANCE TEST INTERVAL EXTENSION

As part of the conversion to Improved Technical Specifications (ITS), the Supply System proposed the extension of the 18 month interval to 24 months for surveillance testing. The evaluation to support the proposed extension was performed in accordance with the guidance in Generic Letter (GL) 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle." As discussed in GL 91-04, a different method was used to evaluate the proposed extension for instrument calibrations than was used for the other surveillances. This report was prepared to provide additional information to support the extension up to 30 months for other surveillance intervals (non-instrumentation calibrations). The review of the Technical Specifications surveillance procedures was performed to support the development of the ITS and was completed in August 1995.

For each surveillance requirement, available surveillance data from 1990 through 1995 were reviewed to assess functional performance. In addition, during the surveillance testing, a Problem Evaluation Request (PER) was generated upon a discovery of an equipment problem. For those particular test results specified as UNSATISFACTORY or where a PER resulted, the test results were investigated. The review showed that almost every surveillance test was completed satisfactorily. Moreover, the majority of PERs generated as the result of the surveillances were not of major significance with respect to safety function of the investigated equipment.

In addition, the evaluation included equipment maintenance history reviews. The primary data sources for determining the equipment history were the Maintenance Rule Scoping and Performance Criteria documents. These documents summarize the results of a plant system reliability and availability examination. Licensee Event Reports, Passport and the Plant Tracking Log were also used. For each function tested, any equipment problems causing functional failures that occurred during the last two operating cycles (prior to R-11) were investigated. The performance history and trend for the equipment associated with each function was assessed to justify extension of the test interval up to 30 months. Finally, the equipment reliability and availability histories were then compared against the criteria for acceptable performance established in the Maintenance Rule.

Each surveillance reviewed exhibited performance that would justify extension of the test interval to 30 months. Equipment performance data were reviewed for functional failures, especially repetitive failures, and the review weighed performance during the pervious two operating cycles more heavily than earlier performance. The equipment performance reviews focussed on establishing that equipment reliability and availability histories indicated that increased surveillance test intervals could be supported. Additional investigation also revealed that, for all but one of the tests which received an unsatisfactory designation, the failure which resulted in the unsatisfactory grade could be expected to have been detected by other surveillance testing which is performed more frequently. In the lone case where a more frequent test of the function did not exist (SECTION 5.5.7, procedure 7.4.7.2.3A), the test failures were the result of procedure performance problems not equipment failures.

SURVEILLANCE TEST INTERVAL EXTENSION

When the surveillance test procedures were found to have resulted in unsatisfactory performance, an investigation into the causes of the test failures were made in addition to the equipment performance review. A summary of these findings is presented below. The results of these specific investigations reference the applicable current Technical Specification (CTS) and the proposed ITS requirements.

SECTION 3.3.1 RPS RESPONSE TIME TESTING

CTS 4.3.1.3 ITS SR 3.3.1.1.15

The evaluation to support the extension of the response time testing for the reactor protection system (RPS) actuation instrumentation consisted of a review of the available historical test results for each loop logic response time surveillance test performed between 1990 and 1995. Each plant procedure generally consists of surveillance of the logic associated with a single instrument loop with three or four tests performed on each loop during the period specified. The number and types for test failures were specifically reviewed. One test failure (procedure 7.4.3.1.3.2.8, CTS Table 3.3.1-1, function 10, performed on 6/12/90) was caused by a sticking solenoid pilot valve. The other failure (procedure 7.4.3.1.3.1.3, CTS Table 3.3.1-1, function 4, performed on 5/5/93) required the recalibration of a process device (instrument). Further investigation found that during the next channel functional test of this instrument, a switch within the device had failed and was replaced. The logic elements used at WNP-2 are typically non-solid state, reliable mechanical relays. There are more frequently performed tests, such as the CFT, that will identify failed components. The recurrence of the failures would not significantly impact the availability of the systems, given a test interval extension up to 30 months, because additional testing which would have discovered the problem is performed with a greater frequency.

Failures were recorded during the performance of the response time testing of the neutron flux high function (procedures 7.4.3.1.3.1, .2, .3, and .4, CTS Table 3.3.1-1, function 2.c). Further investigation revealed that all results found outside the required time could be attributed to the testing method. Subtracting the extra time delay measured from the as found data resulted in the determination that no failures of the circuit to perform the required function within the specified time have occurred. These instruments have fixed time response circuitry with no adjustments. A high degree of confidence in the stability of these circuits is reasonable because the circuit is not adjustable so that any changes will accumulate over time. The data reviewed showed no appreciable, cumulative change in the response time over the 13 years of service. This supports the conclusion that the extension of the test interval up to 30 months is justified.

Based on the results of this evaluation, these failures would not be expected to significantly reduce the availability of the instrumentation loops. It is concluded that the extension of the test interval for the response time tests up to 30 months is justified and would not result in a decrease in safety.

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SECTION 3.3.6 CONTAINMENT ISOLATION RESPONSE TIME TESTING

CTS 4.3.2.3 ITS SR 3.3.6.1.6

The evaluation to support the extension of the response time testing for the containment isolation actuation instrumentation consisted of a review of the available historical test results for each loop logic response time surveillance test performed between 1990 and 1995. Each procedure generally consists of surveillance of the logic associated with a single instrument loop with three or four tests performed on each loop during the period specified. The number and types for test failures were specifically reviewed. Only two were found to have failed the test acceptance criteria.

One test (procedure 7.4.3.2.3.5, CTS Table 3.3.2-1, function 1.c.2, performed 7/2/94) resulted in actual logic actuation time response beyond acceptable limits; a logic relay failed to actuate and was replaced. The second test failure (procedure 7.4.3.2.3.6, CTS Table 3.3.2-1, function 1.c.3) was the result of a problem with the procedure that was corrected by revising the procedure. The logic elements used at WNP-2 are typically non-solid state, reliable mechanical relays. The recurrence of the failures and test interval extension do not impact system availability because additional testing which would have discovered the problem is performed with a greater frequency. Based on the results of this evaluation, these failures would not be expected to significantly reduce the availability of the instrumentation loops. It is concluded that the extension of the test interval for the response time tests up to 30 months is justified and would not result in a decrease in safety.

SECTION 3.3.8 LOSS OF POWER INSTRUMENTATION

CTS 4.3.3.2 ITS SR 3.3.8.1.3

The surveillance requirement for CTS Table 3.3.3.2, function D, is satisfied by the performance of procedures 7.4.8.1.1.2.5B, 7.4.8.1.1.2.5C, and 7.4.8.1.1.2.6. Several failures were identified during the review of the surveillance test history. However, none of the failures were related to the failure of the logic system functional testing. The individual test failures are discussed in the section applicable to the functional problem.

SECTION 3.5.1 ECCS OPERATING

CTS 4.5.1.c ITS SR 3.5.1.5

Plant procedure 7.4.8.1.1.2.7 is performed to satisfy CTS surveillance requirement 4.5.1.c for Division 1 ECCS. On 8/14/91, during the performance of the surveillance, a problem with the surveillance procedure was identified that could have led to water hammer in LPCS. The

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procedure was revised and the test was successfully completed. A second test failure was observed during the performance of the same procedure on 6/6/93. This test failure was the result of the loss of RHR-P-2A discharge pressure and flow indication. The loss of indication was caused by the performance of a different surveillance on the remote shutdown system which resulted in loss of the control room indication during the testing. Procedure 7.4.1.1.2.7 was successfully completed on 6/7/93.

Although failures have been noted in the performance of the procedures necessary to satisfy the surveillance requirement listed, none of the failures were the result of equipment failures. The problems would not impact the availability of the systems given a test interval extension to 30 months. The actual reliability and availability of the systems have been within the performance criteria established for the Maintenance Rule program. The favorable surveillance test history, the performance of additional testing at monthly intervals, and the equipment history justify extension of the surveillance test interval up to 30 months.

SECTION 3.5.3 RCIC SYSTEM

CTS 4.7.3.c.1, 2, and 3 ITS SRs 3.5.3.4 and 5

Plant procedure 7.4.7.3.6 is performed to satisfy CTS surveillance requirements 4.7.3.c.1, 2, and 3. The procedure also satisfies CTS 4.3.5.2, the LSFT for RCIC. On 7/7/92, during the performance of the procedure, the RCIC system was declared inoperable because an incorrect oil type was found in the pump. The system had demonstrated its ability to meet its requirement two days earlier and no other unsatisfactory test results were seen. The impact of failing to detect this problem during the 18 month surveillance test would not significantly effect RCIC availability because quarterly surveillances are performed that would identify any degradation as a result of the incorrect oil.

During the shutdown for the annual outage, on 4/22/95, the RCIC system was declared inoperable due to the malfunction of the lube oil cooler pressure control valve. The controller was recalibrated and the system was restored during startup testing. The availability of the equipment would not have been impacted by the proposed interval extension, because the quarterly testing would have identified this problem. The equipment history review during the last two operating cycles and prior to July 1995, indicated RCIC was within the performance criteria limits established for the Maintenance Rule. However, since July 1995, RCIC has exceeded its performance criteria limits due to functional failures and exhibited a higher unavailability than expected. RCIC has experienced repetitive failures of RCIC-V-28 due to excessive corrosion and electronic over speed trips. Corrective action for both problems are being implemented. The valve has been replaced with a valve of different material which is not as susceptible to the corrosion induced failure and the electronic trip mechanism will be disabled. The favorable surveillance test history, the additional functional testing performed quarterly, and projected system reliability and availability improvements, justify the extension of the test interval up to 30 months.

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SECTION 3.6.1.6 REACTOR BUILDING TO SUPPRESSION CHAMBER VACUUM BREAKERS

CTS 4.6.4.2.b.2.a ITS SR 3.6.1.6.3

Plant procedure 7.4.6.4.2.3 is performed to satisfy CTS surveillance requirement 4.6.4.2.b.2. On 2/2/94, the procedure was performed for CSP-V-7 due to a problem identified during monthly testing. The problem was determined to be a procedural problem involving the pneumatic operator. This problem was resolved by changing the test method. The problem with the operator would not have prevented the vacuum breaker from performing the safety function.

The available surveillance history for the verification of the opening pressure for the containment vacuum breakers was reviewed. All test results were satisfactory and there was no indication of time dependant failures. The equipment history was also determined by reviewing the Maintenance Rule Scoping and Performance Criteria documents. Based on this review it was determined that the interval extension is acceptable.

SECTION 3.6.3.1 HYDROGEN RECOMBINER SYSTEM

CTS 4.6.6.1.b.2, 3, and 4 ITS SRs 3.6.3.1.1, 2, and 3

Plant procedure 7.4.6.6.1.1 is performed to satisfy CTS surveillance requirement 4.6.6.1.b.2. On 9/9/91, the performance of the surveillance test was suspended due to testing problems encountered. The procedure was successfully performed on 9/10/91. The CAC system availability would not be expected to be significantly impacted if the surveillance test interval is extended to 30 months. Plant procedures 7.4.6.6.1.4 and 7.4.6.6.1.5 are performed to satisfy CTS surveillance requirements 4.6.6.1.b.3 and 4. No failures were identified during the review of the surveillance history. The equipment history review showed no functional failures involving the components tested during the two previous operating cycles. Therefore, the system reliability supports the extension of the test interval CTS 4.6.6.1.b.2, .3, and .4 up to 30 months.

SECTION 3.7.1 SERVICE WATER

CTS 4.7.1.1.b ITS SR 3.7.1.5

Plant procedures 7.4.8.1.1.2.7 and 7.4.8.1.1.2.7A are preformed to satisfy CTS surveillance requirement 4.7.1.1.b. A review of the surveillance history indicated three failures in the performance of these procedures. The failures were reviewed and determined not related to the Service Water system functions being tested. The failures are discussed in the section applicable to the functional problem (3.5.1 and 3.8.1).

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SECTION 3.7.2 HPCS SERVICE WATER

CTS 4.7.1.2.b ITS SR 3.7.2.2

Plant procedure 7.4.8.1.1.2.8 is performed to satisfy CTS surveillance requirement 4.7.1.2.b. A review of the surveillance history indicated unsuccessful completion of this procedure on 7/4/94. The failure involved the failure of diesel support equipment to start. This equipment problem is discussed in the section applicable to the functional problem (3.8.1). No failures were related to the ability of the HPCS SW system to perform the required safety function.

SECTION 3.7.3 CREF

CTS 4.7.2 ITS SR 3.7.3.3 and 4

Plant procedure 7.4.7.2.8 is performed to satisfy CTS surveillance requirement 4.7.2.e.2. On 6/17/92, a portion of the procedure was performed on the control room ventilation system to investigate problems with WMA-FN-54B. The test failed because of ongoing maintenance activities on the air handling unit. The test was successfully performed after maintenance was completed on 6/27/92.
On 11/21 and 11/22/94, during performance of this surveillance, WMA-FN-54B failed to develop the required differential pressure. It was discovered that this was a failure due to the lack of integrity of the control room boundary rather than a failure of the control room ventilation system. Corrective actions were taken to assure the boundary integrity. These two failures were the result of personnel error rather than equipment failures.

No repetitive time dependant failure mechanisms were found. The review of the equipment history found no functional failures associated with these systems during the previous 2 operating cycles. The equipment history and the more frequently performed testing justify extension of the test interval up to 30 months.

SECTION 3.8.1 AC SOURCES OPERATING

CTSs 4.8.1.1.1.b, 4.8.1.1.2.e.2, 4.8.1.1.2.e.3, 4.8.1.1.2.e.4, 4.8.1.1.2.e.5, 4.8.1.1.2.e.6, 4.8.1.1.2.e.7, 4.8.1.1.2.e.8, 4.8.1.1.2.e.10, 4.8.1.1.2.e.11, and 4.8.1.1.2.e.12

ITS SRs 3.8.1.8, 3.8.1.9, 3.8.1.10, 3.8.1.11, 3.8.1.12, 3.8.1.19, 3.8.1.13, 3.8.1.14,3.8.1.15, 3.8.1.16, 3.8.1.17, and 3.8.1.18, respectively

These surveillance requirements are met by the performance of several plant procedures. The surveillance history was reviewed. The systems are tested individually, so the procedures

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represent the divisional tests performed. The specific problems identified are discussed below. Table 1 associates the applicable procedure with the surveillance requirement.

Plant procedure 7.4.8.1.1.2.5B: On 5/10/91, DG-1 failed to start in less than 10 seconds (10.2 sec). A repeat of the hot restart function was required. A recurrence of the failure observed would not significantly impact the availability of the system, given a test interval extension to 30 months, because additional testing is performed on the DG with a greater frequency (PPMs 7.4.8.1.1.2.1 and 7.4.8.1.1.2.2). Procedure 7.4.8.1.1.2.2 is performed semi-annually and slow starts would be detectable under this test (new SR 3.8.1.7). No other unsatisfactory surveillance results were identified. The favorable surveillance test history, the additional semi-annual functional testing, and the system reliability justify extension of the test interval up to 30 months.

Plant procedure 7.4.8.1.1.2.5C: On 5/31/91, during the DG-2 24 hour run, the diesel could not be paralleled to its bus due to a lack of voltage indication on the incoming voltmeter. Troubleshooting found the secondary potential transformer fuse to the synchronizing circuit in the switch gear had blown. The availability of the DG would not be expected to be significantly affected due to a recurrence of this failure if the surveillance test interval were to be extended to 30 months. The ability of the DG to be paralleled to the grid is tested monthly under procedure 7.4.8.1.1.11 (new SR 3.8.1.3). The other surveillance test results were satisfactory. The equipment history review also showed the reliability and the availability of the Division 2 DG to be within the established bounds for acceptable system performance over the last two operating cycles. The favorable surveillance test history, the additional functional testing performed, and the system reliability justify extension of the test interval up to 30 months.

Plant procedure 7.4.8.1.1.2.7: On 6/6/93, the DG failed to start. The retest was successful on 6/7/93. While equipment failure resulting in an inability to perform the function under test has occurred, the recurrence of these failures would not be expected to significantly impact the availability of the system, given a test interval of 30 months, because additional testing is performed on the DG with a greater frequency (procedures 7.4.8.1.1.2.1 and 7.4.8.1.1.2.2). At least one of these tests is performed each month and the failure which was observed under procedure 7.4.8.1.1.2.7 would be detectable under the monthly test. The equipment history review showed no subsequent failures to start. Moreover, the actual reliability and availability of DG-1 has been within the performance criteria established for the Maintenance Rule program. The favorable surveillance test history, the additional testing conducted at monthly intervals, and the equipment history justify extension of the surveillance test interval up to 30 months.

Plant procedure 7.4.8.1.1.2.8: On 7/4/94, the surveillance test was unsatisfactory due to the failure of the fan (DMA-FN-31) in the room air handling unit to start. While equipment failure resulting in an inability to perform the function under test has occurred, the recurrence of this failure would not be expected to significantly impact the availability of the system, given a test interval of 30 months, because additional testing is performed on the DG with a greater frequency (procedures 7.4.8.1.1.2.12 and 7.4.8.1.1.2.13). At least one of these tests is

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performed each month and each requires a verification of a DMA-FN-31 start. No other unsatisfactory test performance was identified. The equipment history review showed that the performance of the HPCS DG and the HPCS SW experienced no functional failures over the last two operating cycles. In addition, the DMA system performance has been within the performance criteria established for the Maintenance Rule program. The favorable surveillance test history, the additional monthly testing and the equipment history justify extension of the surveillance test interval up to 30 months.

SECTION 3.8.4 DC SOURCES

CTS 4.8.2.1.c.4.e ITS SR 3.8.4.6

Plant procedure 7.4.2.1.18: In May 1995, during the performance of the surveillance test to satisfy CTS 4.8.2.1.c.4.e, the charger input breaker for the 250V battery tripped due to thermal overload. The cause of the trip was determined to be build up of heat from adjacent electrical components due to a lack of ventilation in the room. After the room ventilation was restored, the test was performed without further problems.

Although a problem was noted in the performance of the procedure necessary to satisfy the surveillance requirement listed, the problem noted would not be expected to impact the availability of the systems given a test interval extension to 30 months. The actual reliability and availability of the systems have been within the performance criteria established for the Maintenance Rule program. The favorable surveillance test history and the equipment history justify extension of the surveillance test interval up to 30 months.

SECTION 5.5.2 PRIMARY COOLANT SOURCES OUTSIDE CONTAINMENT

CTS 6.8.4.a.2 ITS 5.5.2.b

Primary Coolant Leakage Outside Containment, CTS 6.8.4.a.2, is currently satisfied by the performance of procedures 7.6.0.1 through 7.6.0.9. The available surveillance history of these procedures was reviewed and one failure was identified. This failure was the result of two problems. Investigation into the cause of the excessive leakage identified during the performance of the procedure on 9/21/95, determined that two lines in the sample rack had been incorrectly installed during the last maintenance. As a corrective action, the tubing was more clearly labeled to preclude repeating this error. In addition, the most recent revision to the surveillance procedure required the system to be pressurized against a containment isolation valve in the reverse direction. The failure of the valve to seat adequately under these conditions indicated unacceptable system leakage. The procedure was revised so that a different type of valve was used as the test boundary.

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In addition to these procedures, there are other activities performed more frequently that will identify system leakage. The equipment operator tours are required to watch for and identify system leakage problems. There are regular walkdowns by the system engineers. The quarterly operability procedures also require a system walkdown to look for leaks. Adequate protection provided by more frequently performed activities justifies the extension of the surveillance interval in ITS Section 5.5.2.b. The 24 month frequency is consistent with the Appendix J leakage testing requirements.

SECTION 5.5.7 VENTILATION FILTER TESTING PROGRAM

CTSs 4.6.5.3.b.1, 4.6.5.3.b.2, 4.6.5.3.b.3, 4.6.5.3.d.1, 4.6.5.3.d.4, 4.7.2.c.1, 4.7.2.c.2, 4.7.2.c.3, 4.7.2.e.1, and 4.7.3.e.3

ITSs 5.5.7, 5.5.7.a, 5.5.7.b, 5.5.7.c, 5.5.7.d, and 5.5.7.e

The surveillance history was reviewed. The specific problems identified are discussed below, by procedure number. The list of the surveillance procedures which are performed to satisfy the filter and ventilation program surveillance requirements are shown in Table 2.

Plant procedure 7.4.6.5.3.2A: On 7/2/94, the performance of the procedure was halted and a work request was issued to recalibrate a flow transmitter. The procedure did not provide adequate direction on the use of the test equipment and the failure was not related to the system under test. This was resolved and the procedure was completed successfully.

Plant procedure 7.4.7.2.3A: On 7/8/91, the surveillance test was unsatisfactory due to improper sampling. A subsequent test was unsatisfactory due to test equipment problems.

The only performance problems associated with these thirteen surveillance tests since 1990 are related to the test itself and not the equipment performance. Moreover, the system demonstrated acceptable performance without any adjustment required subsequent to the unsatisfactory testing. The equipment history review showed no functional failures associated with systems during the previous two operating cycles. The surveillance test and reliability histories support extension of the surveillance test interval up to 30 months.

SURVEILLANCE TEST INTERVAL EXTENSION

TABLE 1

PLANT PROCEDURE	SURVEILLANCE REQUIREMENT	DIVISION
7.4.8.1.1.2	4.8.1.1.1.b	NA
7.4.8.1.1.2.5B	4.8.1.1.2.e.2 4.8.1.1.2.e.3 4.8.1.1.2.e.4 4.8.1.1.2.e.8	DIV 1
7.4.8.1.1.2.5C	4.8.1.1.2.e.2 4.8.1.1.2.e.3 4.8.1.1.2.e.4 4.8.1.1.2.e.8	DIV 2
7.4.8.1.1.2.6	4.8.1.1.2.e.2 4.8.1.1.2.e.3 4.8.1.1.2.e.4 4.8.1.1.2.e.8	HPCS
7.4.8.1.1.2.7	4.8.1.1.2.e.5 4.8.1.1.2.e.6 4.8.1.1.2.e.7 4.8.1.1.2.e.10 4.8.1.1.2.e.11 4.8.1.1.2.e.12	DIV 1
7.4.8.1.1.2.7A	4.8.1.1.2.e.5 4.8.1.1.2.e.6 4.8.1.1.2.e.7 4.8.1.1.2.e.10 4.8.1.1.2.e.11 4.8.1.1.2.e.12	DIV 2
7.4.8.1.1.2.8	4.8.1.1.2.e.5 4.8.1.1.2.e.6 4.8.1.1.2.e.7 4.8.1.1.2.e.10 4.8.1.1.2.e.11	HPCS

SURVEILLANCE TEST INTERVAL EXTENSION

TABLE 2

PLANT PROCEDURE	SURVEILLANCE REQUIREMENT	SYSTEM
7.4.6.5.3.5A and 7.4.6.5.3.5B	4.6.5.3.b.1	SGT
7.4.6.5.3.6A and 7.4.6.5.3.6B	4.6.5.3.b.2	SGT
7.4.6.5.3.2A and 7.4.6.5.3.2B	4.6.5.3.b.3 4.6.5.3.d.1	SGT
7.4.6.5.3.4A and 7.4.6.5.3.4B	4.6.5.3.d.4	SGT
7.4.7.2.2A and 7.4.7.2.2B	4.7.2.c.1 4.7.2.c.3 4.7.2.e.1	CREF
7.4.7.2.3A and 7.4.7.2.3B	4.7.2.c.2	CREF
7.4.7.2.5	4.7.3.e.3	CREF