50-244

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 1, 1995

See Rpt.

LICENSEE: Rochester Gas and Electric Corporation

FACILITY: R. E. Ginna Nuclear Power Plant

SUBJECT: SUMMARY OF MEETING WITH ROCHESTER GAS AND ELECTRIC CORPORATION ON TECHNICAL SPECIFICATION IMPROVEMENT PROGRAM - NOVEMBER 13-17, 1995

Rochester Gas and Electric Corporation (RG&E) met with the staff to clarify their May 26, 1995, submittal that proposes to convert existing Ginna plant technical specifications (TSs) to improved TSs based on NUREG-1431, Revision 0, "Standard Technical Specifications (STS) Westinghouse Plants." The meeting included a detailed review of instrumentation, electrical power systems, refueling operations, design features and use and application sections TSs in addition to a general review of the RG&E responses to questions identified during earlier meetings.

The discussions held between the staff and RG&E focused on differences between the existing TS licensing basis, the plant design as reflected in the Updated Final Safety Analysis Report, plant operational practices and the May 1995 license amendment application to adopt the STSs. A summary of the most significant changes resulting from the meeting are provided below. At the conclusion of the conversion review, the staff will prepare a safety evaluation stating the basis for accepting the proposed changes to the existing Ginna plant TSs.

The staff discussed the RG&E proposal to rewrite the reactor trip system and engineered safety feature systems instrumentation STSs using a separate condition entry format. This format directs operators to use the table presentation of remedial actions upon discovery of one or more inoperable channels. This new presentation also includes the use of single column format for instrumentation trip setpoints. The proposal is like the pending industry position to change the STS except RG&E did not adopt the industry position that would require the appropriate shutdown actions for the loss of function condition only after a 1 hour restore period is elapsed. This 1 hour allowance is already included in the provisions of specification 3.0.3 which generally applies to the condition of a limiting condition of operation (LCO) not met or action not provided for in the TSs.

RG&E proposed to relocate requirements for closed containment penetrations during refueling operations from the existing TSs to the technical requirements manual based on their assessment that the criteria of 10 CFR 50.36 do not apply to the Ginna fueling accident inside containment licensing basis. The staff rejected this position at a meeting held on November 16, 1995. As a result of this decision, the staff discussed the RG&E proposed

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markup of the STSs for LCO, 3.3.6, "Containment Purge and Exhaust Isolation Instrumentation" and LCO 3.9.4, "Containment Penetrations" to reflect the plant licensing basis.

RG&E proposed to use lower case management titles to specify the titles for personnel fulfilling the responsibilities of the positions delineated in the improved TS administrative controls for onsite and offsite organizations. The staff agreed to the majority of title changes except for the "specified corporate executive position" having corporate responsibility for overall safe operation of the plant. RG&E proposes to specify "a corporate vice president" as the corporate official. Staff approval of the RG&E position is under review.

RG&E proposed several generic changes to the STSs that relocated cycle-specific parameters from TS to the core operating limits report (specification 5.9.1.6) in response to the guidance provided to the industry in Generic Letter 88-16. These limits were discussed in Attachment F to the May 26, 1995 letter. The reactor coolant system departure from nucleate boiling limits, reactor water storage tank boron concentration and accumulator boron concentration limits will be considered on a generic basis by the staff for future changes to the STSs. Until final review and approval of the generic STS changes, the Ginna TS limits will be controlled in the appropriate reactivity system TS.

Enclosure 1 is a list of meeting attendees. A list of questions related to the staff's request for RG&E to provide clarification of the May 1995 submittal is included in Enclosure 2. RG&E agreed to docket responses to these questions along with the Ginna final draft TS scheduled for completion in December 1995.

Carl S. Schulten, Senior Reactor Engineer
Technical Specifications Branch
Office of Nuclear Reactor Regulation

Docket No. 50-244

Enclosures: 1. List of Attendees
2. TSIP Questions

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Original signed by:

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Technical Specifications Branch
Office of Nuclear Reactor Regulation

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Meeting Summary

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Enclosure 1

LIST OF MEETING ATTENDEES
NRC MEETING WITH ROCHESTER GAS AND ELECTRIC CORPORATION
R. E. GINNA NUCLEAR POWER PLANT
Technical Specifications Improvement Program

November 13-17, 1995

NAME	ORGANIZATION
November 13, 1995	
Al Johnson	NRC/NRR/DRPE/PDI-1
Glenn Dentil	NRC/NRR/RI-DRS
Carl Schulten	NRC/NRR/ADPR/TSB
Maryann Biamonte	NRC/NRR/DRCH/HHFB
Margaret Chatterton	NRC/NRR/DSSA/SRXB
Renaldo Jenkins	NRC/NRR/DE/EELB
Mark Flaherty	RG&E
November 14, 1995	
Alan Udy	LMIT
November 15, 1995	
Pete Sidelinger	RG&E
November 16, 1995	
Peter Sidelinger	RG&E
Carl Schulten	NRC/NRR/ADPR/TSB
Alan Udy	LMIT
Mark Flaherty	RG&E
November 17, 1995	
Peter Sidelinger	RG&E
Carl Schulten	NRC/NRR/ADPR/TSB
Alan Udy	LMIT
Mark Flaherty	RG&E
Margaret Chatterton	NRC/NRR/DSSA/SRXB

GINNA IMPROVED TECHNICAL SPECIFICATIONS REVIEW QUESTIONS

Section 1.0 Current TS

1. Technical Specification 1.0

   i. TS 1.2 - The definitions of operating MODES were revised as follows (these are Ginna TS Category (v.a) changes):

      a. Refueling - see Note 1.ii below.

      b. Cold Shutdown - The reactivity limit was revised from ≤ -1 $\Delta k/k\%$ to $< 0.99\ k_{eff}$ which are equivalent limits.

1.0 Q1 Document the conclusion that the ITS reactivity limit is equivalent to the CTS requirements. Note that administrative changes are described as follows: Non-technical, administrative changes are intended to incorporate human-factors principles into the form and structure of the improved plant TS so that they would be easier to use for plant operations personnel. These changes are editorial in nature or involve the reorganization or reformatting of requirements without affecting technical content or operational requirements.

      c. Hot Shutdown - The reactivity limit was revised from ≤ -1 $\Delta k/k\%$ to $< 0.99\ k_{eff}$ which are equivalent limits. The average reactor coolant temperature was also revised from $\geq$ 540°F to $\geq$ 350°F. This change eliminates the use of an intermediate mode of 350°F as found throughout the current TS which is not defined in TS 1.2.

1.0 Q2 Does the statement, "This change eliminates the use of an intermediate mode of 350°F as found throughout the current TS which is not defined in TS 1.2." mean that the 350 degree number was used to establish a mode in the ITS that is equivalent to the CTS mode limits? Explain. The expansion of this temperature range is conservative since the current TS only use the Hot Shutdown MODE in two aspects. The first method is requiring a shutdown to this mode due to plant conditions. Since the upper temperature range for Hot Shutdown remains the same (i.e., the Operating MODE temperature), there is no impact.

1.0 Q3 Clarify the statement " Since the upper temperature range for Hot Shutdown remains the same (i.e., the Operating MODE temperature), there is no impact." Is there zero impact or is the impact inconsequential? Explain. The second method is to require certain equipment to be OPERABLE in this mode. However, lowering the temperature limit to 350°F requires that the equipment would be OPERABLE for a larger temperature range.

d. Operating - The reactivity limit was revised from > -1 $\Delta k/k\%$ to $\geq$ 0.99 k_{eff} which are equivalent limits. The average reactor coolant temperature of ~ 580°F was not added since this parameter is specified in new LCO 3.4.1.

1.0 Q4 LCO 3.4.1 establishes DNBR limits. Clarify how the temperature limit for existing TS reactivity limits are provided for in the ITS. In addition, the Operating MODE was separated into two modes: Operating and Startup. The only difference between these two modes is that Startup is defined when the reactor is $\leq$ 5% Rated Thermal Power (RTP) while the Operating MODE is when the reactor is > 5% RTP.

1.0 Q5 The statement about the difference between the operating and startup modes is factual. Explain why this is or is not a change to the existing operational requirements for Ginna? Provide supporting justification for your response.

e. A new operating mode (Hot Standby) was provided between Hot Shutdown and Cold Shutdown. This mode is defined as when the reactivity condition is < 0.99 k_{eff} and the average reactor coolant temperature is < 350°F and > 200°F when the reactor vessel head closure bolts are fully tensioned. The definition of this new mode eliminates the use of an intermediate mode of 350°F as found throughout the current TS which is not defined in TS 1.2.

1.0 Q6 Explain why this is or is not a change to the existing operational requirements for Ginna? Provide supporting justification for your response.

ii. TS 1.3 - This definition of refueling was deleted. The current TS 1.2 provides a definition of refueling as being the reactor mode when reactivity is $\leq$ -5 $\Delta k/k\%$ and the average reactor coolant temperature is $\leq$ 140°F. TS 1.3 states that refueling is "any operation within the containment involving movement of fuel and/or control rods when the vessel head is unbolted" which is a subset of the mode defined in TS 1.2. The new TS Table 1.1-1 states that refueling is any condition in which "one or more reactor vessel head closure bolt is less than fully tensioned" with fuel in the reactor. While an average reactor coolant temperature or reactivity limit is no longer provided for the refueling mode definition, the reactor vessel head closure bolts cannot be removed at elevated reactor coolant temperatures or when the RCS is pressurized due to their design. A reactivity limit is also not required when the RCS is depressurized. Therefore, the new definition of the refueling mode is more conservative than current TS 1.3 and generally consistent with TS 1.2. This is a Ginna TS Category (v.a) change.

1.0 Q7 The current TS activity and temperature limits have been deleted in the ITS. Why do the ITS operational limits that result from the changes to the refuel definitions result in more restrictive operational requirements for the Ginna Station? Provide supporting justification for your response. What is the minimum

temperature and pressure at which the reactor pressure vessel head bolts can be detensioned as allowed by plant procedures? Compare this temperature and pressure to the ITS definition of refueling and

explain why there is or is not a change to the existing operational requirements for Ginna? Provide supporting justification for your response.

iii. TS 1.5 - The definition for Operating was not added to the new specifications since it is no longer required. This definition is addressed by the new definition for OPERABLE - OPERABILITY. This is a Ginna TS Category (i) change.

iv. TS 1.6 - The definition for Degree of Redundancy (Instrument Channels) was not added to the new specifications since it is no longer required. This definition is addressed within new TS 3.3 (Instrumentation). This is a Ginna TS Category (v.c) change.

v. TS 1.7.1 - This was revised to specify that the CHANNEL CALIBRATION includes the required interlock and time constant functions of the channel.

1.0 Q8 Approval of the use of time constant functions in the definition of channel calibration requires a WOG traveler for review and approval by the staff. In addition, discussion of calibrating instrument channels with resistance temperature detectors was added for clarification. These are Ginna TS Category (v.a) changes.

vi. TS 1.7.2 - The last sentence of this definition was revised as follows:

> This determination shall include, where possible, comparison of the channel indication and status to other indications or status derived from independent instrumentation channels measuring the same parameter.

These minor changes provide greater clarification of the defined term and are Ginna TS Category (v.c) changes.

vii. TS 1.7.3 - The definitions for testing of analog and bistable channels were combined into one description with a new title. The only difference between the two definitions is that testing of bistable channels required injection of a simulated or source signal into the sensor versus "as close to the sensor as possible" for analog channels.

1.0 Q9 Another difference is the use of an "actual" signal in the ITS vice "source signal" in the CTS. Explain why this is or is not a change to the existing operational requirements for Ginna? Provide supporting justification for your response.. Since the bistable must be actuated to determine operability, maintaining the analog channel description for the combined definition is acceptable. In

addition, the combined definition was expanded to require "adjustments, as necessary, of the required alarm, interlock, and trip setpoints so that the setpoints are within the required range and accuracy." These are Ginna TS Category (v.a) changes.

viii. TS 1.7.4 - The definition for Source Check was not added to the new specifications since it is no longer required. The performance of a Source Check is now addressed within the definition of CHANNEL CALIBRATION and CHANNEL OPERATING TEST (COT).

1.0 Q10 This is a conclusion without an evaluation to support the conclusion. Explain why this is or is not a change to the existing operational requirements for Ginna? Provide supporting justification for your response. This is a Ginna TS Category (v.c) change.

ix. TS 1.8 - The definition for Containment Integrity was not added to the new specifications since it is no longer required. Containment Integrity is addressed by new TS 3.6 which essentially requires compliance with 10 CFR 50, Appendix J.

1.0 Q11 Explain how the ITS limits are editorial in nature or involve the reorganization or reformatting of requirements without affecting changes to the existing operational requirements for Ginna? Provide supporting justification for your response. This is a Ginna TS Category (v.c) change.

x. TS 1.10 - The definition for Hot Channel Factors was not added to the new specifications since it is no longer required. The Hot Channel Factor limit is only discussed in one LCO with the limit defined in the COLR.

1.0 Q12 Explain how the ITS limits are editorial in nature or involve the reorganization or reformatting of requirements without affecting changes to the existing operational requirements for Ginna? Provide supporting justification for your response. This is a Ginna TS Category (v.c) change.

xi. TS 1.11 - This previously deleted definition was not added to the new specifications. This is a Ginna TS Category (vi) change.

xii. TS 1.12 - The Frequency for Surveillance Requirements is now specified in hours, days or months in the new specifications such that the current definition of Frequency Notation is no longer required. Consequently, this definition was replaced with a general description of how to use and apply the Frequency requirements. In addition, the definition of refueling Frequency was revised from 18 months to 24 months for all systems. This is discussed in Attachment H and is a Ginna TS Category (v.b.1) change.

xiii. TS 1.13 - The definition for Offsite Dose Calculation Manual (ODCM) was

1.0 Q13 Are the following redline/strikeout text changes appropriate? If so modify the justification, if not provide the appropriate changes to explain how the ITS limits are editorial in nature or involve the reorganization or reformatting of requirements without affecting changes to the existing operational requirements for Ginna? ..

> "moved to the ODCM program description in ITS specification 5.5.1. The change to the CTS is editorial because the program description involves the reorganization or reformatting of requirements without affecting technical content"

This is a Ginna TS Category (v.c) change.

xiv. TS 1.14 - The definition for Process Control Program (PCP) was not added to the new specifications since it is no longer required. The PCP was relocated from the technical specifications to the TRM and does not need to be described within new TS 1.1. This is a Ginna TS Category (v.c) change.

xv. TS 1.15 - The definition for Solidification was not added to the new specifications since it is no longer required. Solidification is described within the PCP which was relocated from the technical specifications to the TRM. Therefore, this definition does not need to be provided in new TS 1.1. This is a Ginna TS Category (v.c) change.

xvi. TS 1.16 - The definition for Purge - Purging was not added to the new specifications since it is no longer required. This definition only pertains to the Containment Purge system which is described in new TS 3.6.3.

1.0 Q14 Explain how the ITS limits are editorial in nature or involve the reorganization or reformatting of requirements without affecting changes to the existing operational requirements for Ginna? Provide supporting justification for your response. This is a Ginna TS Category (v.c) change.

xvii. TS 1.17 - The definition for Venting was not added to the new specifications since it is no longer required. This definition only pertains to the Containment Purge system which is described in new TS 3.6.3.

1.0 Q15 Explain how the ITS limits are editorial in nature or involve the reorganization or reformatting of requirements without affecting changes to the existing operational requirements for Ginna? Provide supporting justification for your response. This is a Ginna TS Category (v.c) change.

xviii. TS 1.18 - The reference to the "dose conversion factors for adult thyroid dose via inhalation" was not added to the new specifications since a specific reference to Table E-7 of Regulatory Guide 1.109 was added. This table only contains dose conversion factors for adults via inhalation.

1.0 Q16 Provide a CTS markup of this change. Explain how the ITS limits are editorial in nature or involve the reorganization or reformatting of requirements without affecting changes to the existing operational requirements for Ginna? Provide supporting justification for your response. Therefore, the existing reference is no longer necessary. This change is consistent with Traveller WSTS-1, C.2. This is a Ginna TS Category (vi) change.

xix. TS 1.19 - The definition for Reportable Event was not added to the new specifications since it is no longer required. Reportable Events are described in 10 CFR 50.72 and 50.73. This is a Ginna TS Category (ii) change.

xx. TS 1.20 - The definition for Canisters Containing Consolidated Fuel Rods was not added to the new specifications since it is no longer required. This definition is provided in new TS 4.3 which is the only section that addresses consolidated fuel rods. This is a Ginna TS Category (v.c) change.

xxi. TS 1.21 - The definition for Shutdown Margin was expanded to require another assumption that in MODES 1 and 2, the fuel and moderator temperatures are changed to the nominal hot zero power temperature. Also, the definition was revised to require consideration of any RCCA known to be incapable of being fully inserted. This is in addition to the existing assumptions related to a stuck fully withdrawn single RCCA with the highest reactivity worth. The definition description discussing "no changes in xenon or boron concentration" was deleted since this level of detail is not required. These clarifications, which are consistent with NUREG-1431, are Ginna TS Category (v.a) changes.

xxii. TS 1.4 - The definition for OPERABLE - OPERABILITY was revised to remove "supports." This phrase was added to the current definition by Reference 3 but is not consistent with the definition as provided in NUREG-1431. Therefore, to provided consistency, this was not added to the new specifications. This is a Ginna TS Category (v.c) change.

xxiii. The following definitions were added to the new specifications since the associated terms are used throughout the document (these are Ginna TS Category (v.a) changes):

a. ACTIONS
b. ACTUATION LOGIC TEST
c. AXIAL FLUX DIFFERENCE
d. CORE ALTERATION
e. CORE OPERATING LIMITS REPORT (COLR)
f. LEAKAGE
g. PHYSICS TESTS
h. PRESSURE TEMPERATURE LIMITS REPORT (PTLR)
i. RATED THERMAL POWER

j. STAGGERED TEST BASIS
k. TRIP ACTUATING DEVICE OPERATIONAL TEST (TADOT)

xxiv. A new section was added to the specifications which explains the use of Logical Connectors within the new TS. This section does not provide any new requirements, only a description and examples of how to use the new ITS format. This is a Ginna TS Category (v.c) change.

xxv. A new section was added to the specifications which explains the use of the Completion Time convention within the new TS. There are several changes from the current Ginna Station TS format which are discussed in this section (these are Ginna TS Category (v.a) changes):

a. Completion Times in the new TS are based on the format that the clock for all Required Actions begin from the time that the Condition is entered. The Completion Times in the new specifications and the current Ginna Station TS are typically equal. For example, the new specifications may require that the plant be in MODE 3 within 6 hours and in MODE 4 within 36 hours for a specified Condition while the current Ginna Station TS require that the plant be in MODE 3 within 6 hours and in MODE 4 within an additional 30 hours for the same Condition. The intent of both the new specifications and the current Ginna Station TS is the same (i.e. be in MODE 4 within 36 hours).

b. The new specifications restrict multiple entries into the ACTION table for separate Conditions unless it is specifically stated as acceptable. For example, if one SI pump is inoperable and during the LCO, a second SI pump is declared inoperable, the plant would enter 3.0 conditions in both the new specifications and the current Ginna Station TS. If the first SI pump were restored to OPERABLE status before entering MODE 3, the plant could resume operation in both TS. However, in the current TS, the Completion Time for restoring the second SI pump to OPERABLE status would begin from the time that it was declared inoperable. In the new specifications, the Completion Time would begin from the time the <u>first</u> pump was declared inoperable with an additional 24 hours allowed. This is a conservative change.

xxvi. A new section was added to the specifications which explains the use of the Frequencies specified within the SRs. This section does not provide any new requirements, only a description and examples of how to use the new ITS format. This is a Ginna TS Category (v.c) change.

Section 1.0 Improved TS
1.ITS 1.1

i. Incorporation of approved Traveller WOG-01, C.1.

ii. Incorporation of approved Traveller BWOG-01, C.1.

iii. Incorporation of approved Traveller BWR-05, C.1. This traveller was also revised to replace the second use of "cross calibration" in the CHANNEL CALIBRATION definition with "qualitative assessment of sensor behavior."

1.0 Q17 Confirm the revised traveler changes, and if necessary correct the markup of the Channel Calibration definition to match the approved traveler. This change provides consistency within the definition and is an ITS Category (iii) change.

iv. Incorporation of approved Traveller BWR-05, C.3, and approved Traveller BWOG-01, C.3.

v. Minor changes were made to the Definitions and the Completion Time and Frequency discussions to provide consistency within the new specifications and bases. Examples include the use of "plant" versus "unit" since there is only one nuclear unit at Ginna Station,

1.0 Q18 Replacing "unit" with "plant" is acceptable

specifying that the LEAKAGE definition is related to the RCS

1./0 Q19 Specifying that the LEAKAGE definition is related to the RCS is not acceptable because not all terms used in the definition refer to RCS leakage.

and editing the AVERAGE DISINTEGRATION ENERGY definition for better readability.

1.0 Q20 Stet the proposed deletion of "(in MeV)". This is the energy associated with beta and gamma releases on a per disintegration basis. Otherwise provide an NEI traveler for this change. These are ITS Category (iv) changes.

vi. The definitions for ENGINEERED SAFETY FEATURE (ESF) RESPONSE TIME, REACTOR TRIP SYSTEM (RTS) RESPONSE TIME, MASTER RELAY TEST, and SLAVE RELAY TEST, were not added to the new specifications. The current Ginna Station TS do not require ESF or RTS response time testing, nor master and slave relay testing. These requirements are not being added to the new specifications consistent with Reference 2. Therefore, these definitions are not applicable. These are ITS Category (i) changes.

vii. Not used.

viii. Incorporation of approved Traveller BWOG-09, C.26.

ix. Incorporation of approved Traveller BWR-02, C.4.

x. The definition of QUADRANT POWER TILT RATIO (QPTR) was replaced with the definition provided in current Ginna Station TS 1.9. The use of the ITS definition for QPTR would require modifications to the Ginna Station process computer, procedures, and operator training. The current QPTR definition was added to the Ginna Station TS by References 4 and 5.

1.0 Q21 Explain why the proposed ITS definition, without the last sentence of the CTS definition, is or is not a change to the existing operational requirements for Ginna. Provide supporting justification for your response. This is an ITS Category (i) change.

xi. Incorporation of approved Traveller BWR-18, C.2.

xii. Incorporation of approved Traveller BWOG-01, C.4.

1.0 Q22 Justify the changes to the [] statement in the iSTS definition of shutdown margin

xiii. The titles for MODES 3 and 4 were switched. This change provides consistency with the current Ginna Station TS, and the nomenclature used in procedures, the UFSAR and other documents. The revision of all of these documents and operator training materials would require significant resources without any benefit. This is an ITS Category (i) change.

1.0 Q23 Provide documentation that the [] average coolant temperatures for the specified modes is consistent with Ginna CTS procedures.

xiv. The definition of CHANNEL CALIBRATION, COT and TADOT was revised to delete the display requirement on the basis that it will create confusion with respect to establishing the OPERABILITY of a channel. These changes are consistent with Traveller WSTS-1, C.1. This is an ITS Category (iii) change.

xv. The definition of DOSE EQUIVALENT I-131 was revised to delete and relocate to the Bases for LCO 3.4.16 and LCO 3.7.10 the details denoting the thyroid dose conversion factors. This allows future updates of the calculational methods to be revised without having to change the Technical Specifications. As a result of the proposed relocation of information, the approved Traveller BWOG-01, C.2, was not incorporated. This change is consistent with Traveller WSTS-1, C.2. This is an ITS Category (iv) change.

1.0 Q24 These generic changes require submittal of an NEI traveler.

xvi. The definition of PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR) was revised by deleting the references to the LCO's to be consistent with the definition of the COLR and to provide a complete description of its content. This change is consistent with Traveller WSTS-1, C.3. This is an ITS Category (iv) change.

1.0 Q25 These generic changes require submittal of an NEI traveler.

xvii. Incorporation of approved Traveller WOG-35, C.1.

xviii. Incorporation of approved Traveller BWR-14, C.1.

xix. The CHANNEL CALIBRATION definition was revised to include "time constants". This change enables Notes associated with time constants to be removed from Chapter 3.3. This is an ITS Category (i) change.

2. ITS 1.2

i. Incorporation of approved Traveller BWOG-01, C.5.

ii. The term "surveillances" is deleted since logical connectors are not used with respect to surveillances in NUREG-1431. This is an ITS Category (iv) change.

iii. Appropriate titles were applied to each example. This is an ITS Category (iv) change.

1.0 Q26 Editorial comment. Recommended markup for page 1.3-3; 1.3-4 of the markup

3. ITS 1.3

i. Incorporation of approved Traveller BWR-02, C.5.

ii. Incorporation of approved Traveller BWOG-01, C.7.

iii. Incorporation of approved Traveller BWR-02, C.7.

iv. Incorporation of approved Traveller BWOG-01, C.8.

v. Incorporation of approved Traveller BWR-06, C.3 (Rev. 1).

vi. Incorporation of approved Traveller WOG-32, C.1.

vii. Minor changes to Example 1.3-2 and Example 1.3-6 were made to provide additional clarification. These changes do not alter the intent of the examples. This is an ITS Category (iv) change.

1.0 Q27 Editorial comment: o.k., except for the following: Changing "one" to "either." the choice of wording in the iSTS is consistent with the discuss in the second paragraph on page 1.3-4 of the markup; and adding "until the LCO is met" wording to the last paragraph of the iSTS on page 1.3-11 of the markup

viii. Incorporation of approved Traveller BWOG-01, C.9.

ix. The Completion Time description was revised to eliminate confusion regarding the applicability of the Required Actions given additional failures in the absence of provisions for separate

condition entry. This is an ITS Category (iv) change.

1.0 Q25 These generic changes require submittal of an NEI traveler.

x. An additional statement was added to reinforce that, in the application of Completion Time extensions, no single component, subsystem, or variable, etc., can be allowed to remain inoperable for longer than the stated Completion Time. This is an ITS Category (iv) change.

1.0 Q26 Editorial comment. Insert the completion time discussion after the first sentence at the top of page 1.3-2 of the markup

xi. This section refers to Completion Times on a "once per" basis, but no example is referenced. An appropriate example was added. This is an ITS Category (iv) change.

xii. The Completion Time logical connector for Example 1.3-3 was deleted since this connector is not used as discussed in the changes for applicable LCOs. This is an ITS Category (iii) change.

4. ITS 1.4

i. Incorporation of approved Traveller BWR-05, C.14.

ii. Minor changes were made to Example 1.4-1 to eliminate redundant test. These changes do not alter the intent of the example. This is an ITS Category (iv) change.

1.0 Q27 Editorial comment. Let's discuss the changes proposed to page 1.4-2 of the markup, some valuable discussion useful to understanding how to apply SR 3.0.1 have been deleted.

5. ITS 2.1.1

i. SL 2.1.1 was revised to delete the reference to the highest loop average. This is base on Ginna Station designed with two loops. The RCS average temperature trips the reactor on coincidence two-out-of-four signals, with two channels per loop. This is an ITS Category (iv) change.

ii. ITS Figure 2.1.1-1 was replaced with the existing Technical Specification Figure 2.1-1. The Reactor Core Safety Limits (SLs) figure reflects the acceptable operating regions of the plant and is consistent with the current safety analysis. This is an ITS Category (iv) change.

iii. The bases were revised as follows (these are ITS Category (iv) changes):

a. Ginna Station was designed and built prior to the issuance of the GDC contained in 10 CFR 50, Appendix A. However, the draft GDC issued by the Atomic Industrial Forum (AIF) in 1967 were utilized in the design of Ginna Station. The bases were revised to reflect this difference.

b. The discussion of DNB criteria was revised and expanded to reflect plant-specific considerations.

c. Various wording changes were made to improve the readability and understanding of the bases and to reflect plant-specific considerations.

d. The listing of the automatic functions relating to the enforcement of the reactor core SLs was revised consistent with the changes proposed in ITS Chapter 3.3.

e. Ginna Station was analyzed for the locked rotor event to show that the peak reactor coolant system pressure remains below 120% of design. The bases were revised to reflect this difference.

f. The additional words to the reference allow for approved exceptions.

g. A typographical or minor clarification is identified.

iv Incorporation of approved Traveller WOG-01, C.1.

v. Incorporation of approved Traveller BWR-11, C.10 (Rev.1).

6. ITS 2.2

i. SL 2.2.3 - This section and associated bases were not added. The section duplicates a reporting requirement described in 10 CFR 50.36(c)(1) and 10 CFR 50.72. The deletion of this section eliminates the need to change technical specifications when there are rule changes. Since RG&E must meet the applicable requirements contained in the Code of Federal Regulations, or have NRC approved exemptions, there are sufficient regulatory controls in place to allow elimination of duplicate requirements from technical specifications. The implementation of these requirements are contained in procedures or other controlled licensee controlled documents. This change is consistent with Traveller WSTS-2, C.1. This is an ITS Category (i) change.

ii. SL 2.2.4 - This section and associated bases were not added. This requirement for the notification of management personnel and plant safety review committees is similar to the requirements removed from other sections of the ITS (i.e., Chapter 5.0 - "Administrative Controls" for the Onsite and Offsite review function) and relocated to other licensee controlled documents. The relocation of these items will enable RG&E to more efficiently maintain the requirements under existing regulations and reduce the need to request technical specification changes for issues which do not affect public safety. This change is consistent with Traveller WSTS-2, C.1. This is an ITS Category (i) change. As a result of this TS change, approved Traveller WOG-21, C.1 and C.2 were not

incorporated.

iii. SL 2.2.5 - This section and associated bases were not added. The section, in part, duplicates a reporting requirement described in 10 CFR 50.36(c)(1) and 10 CFR 50.73. The deletion of this requirement eliminates the need to change technical specifications when there are rule changes. Since RG&E must meet the applicable requirements contained in the Code of Federal Regulations, or have NRC approved exemptions, there are sufficient regulatory controls in place to allow elimination of duplicate requirements from technical specifications. The implementation of these requirements are contained in procedures or other controlled licensee controlled documents. The section also requires distribution of the safety violation report to certain management personnel and plant safety review committees. This requirement is similar to the requirements removed from other sections of the ITS (i.e., Chapter 5.0 - "Administrative Controls" for the Onsite and Offsite review function) and relocated to other licensee controlled documents. The relocation of these items will enable RG&E to more efficiently maintain the requirements under existing regulations and reduce the need to request technical specification changes for issues which do not affect public safety. This change is consistent with Traveller WSTS-2, C.1. As a result of this change, approved Travellers WOG-21, C.1 and C.2, and BWR-02, C.8 and C.8a were not incorporated. This is an ITS Category (i) change.

iv. SL 2.2.6 - This section and associated bases were not added. The section duplicates a requirement described in 10 CFR 50.36(c)(1). The deletion of this section eliminates the need to change technical specifications when there are rule changes. Since RG&E must meet the applicable requirements contained in the Code of Federal Regulations, or have NRC approved exemptions, there are sufficient regulatory controls in place to allow elimination of duplicate requirements from technical specifications. The implementation of these requirements are contained in procedures or other controlled licensee controlled documents. This change is consistent with Traveller WSTS-2, C.1. This is an ITS Category (i) change.

v. Various wording changes were made to improve the readability and understanding of the bases and to reflect plant-specific considerations. This is an ITS Category (iv) change.

7. ITS 3.0

i. For completeness LCO 3.0.7 should also be referenced in LCO 3.0.1. As discussed in approved Traveller NRC-03, C.5, LCO 3.0.7 addresses a situation when an LCO requirement is allowed not to be met. This is similar to LCO 3.0.2 which addresses the requirement of meeting the associated ACTIONS when not meeting a Limiting Condition for Operation. This change is consistent with Traveller WSTS-3, C.1. This is an ITS Category (iii) change.

ii. Incorporation of approved Traveller BWOG-01, C.10.

iii. Incorporation of approved Traveller BWR-02, C.11.

iv. Incorporation of approved Traveller BWR-05, C.7.

v. Incorporation of approved Traveller BWOG-09, C.26 (Rev 1).

vi. Incorporation of approved Traveller NRC-03, C.5 (Rev 1). Minor changes are made to reflect the actual proposed new TS. These are ITS Category (iv) changes.

vii. Incorporation of approved Traveller BWR-02, C.10.

viii. Incorporation of approved Traveller BWR-25, C.3.

ix. Incorporation of approved Traveller BWR-05, C.10 (Rev 2). Several wording changes were made to increase understanding. These changes do not alter the indent of the Traveller. These are ITS Category (iv) changes.

x. Incorporation of approved Traveller BWR-05, C.12.

xi. Incorporation of approved Traveller BWR-05, C.15 and WOG-01, C.2.

xii. Incorporation of approved Traveller BWR-05, C.13 (Rev 2).

xiii. A typographical or minor clarification is identified. This is an ITS Category (iv) change.

xiv. Incorporation of approved Traveller BWOG-01, C.11.

xv. Incorporation of approved Traveller BWR-07, C.1 (Rev 1).

xvi. LCO 3.0.3 and the bases were revised to remove the requirement to initiate action to shutdown the plant within 1 hour. Instead, the bases require the Shift Supervisor to evaluate the plant conditions to determine if a plant shutdown should be initiated immediately, or deferred if the condition which caused entry into LCO 3.0.3 is expected to be restored within a reasonable period of time. However, the time restrictions in LCO 3.0.3 for MODE changes must always be met. This change provides the plant management and operating staff with the flexibility to determine the best course of action should LCO 3.0.3 be entered. This change is consistent with Traveller WSTS-3, C.2. This is an ITS Category (i) change.

xvii. The bases for SR 3.0.1 were revised to clarify that credit may be taken for unplanned events that satisfy the performance of an SR. This change allows the deletion of multiple Notes within the SRs in Chapter 3 which state the same thing. The change is consistent with Traveller WSTS-3, C.3. This is an ITS Category (iii) change.

xviii. LCO 3.0.4 and the bases were revised to provide greater clarity and consistency with actual Ginna Station practices. First, the details of why exceptions are allowed to LCO 3.0.4 was deleted from the LCO and relocated to the bases. This change provides consistency with LCO 3.0.3 and SR 3.0.2. Second, the bases were revised to provide easier readability. In addition, current Ginna Station operating practices prevent any MODE change, up or down, with inoperable equipment required for the MODE desired to be entered. Therefore, the discussion that LCO 3.0.4 does not prevent MODE changes during a "normal shutdown" conflicts with these practices and was deleted. These are ITS Category (iii) changes.

Section 2.0 & 3.0 Current TS

2. Technical Specification 2.1

i. The Applicability was revised to not only include when the reactor is in "operation" or critical, but also when in MODE 2 and subcritical. This ensures that the Reactor Core Safety Limits are also met during reactor startup since there is a potential for an inadvertent criticality with the reactor near normal operating temperature and pressure conditions. This is a Ginna TS Category (iv.a) change.

2.0 Q1 The existing TS 2.1 reactor core safety limit applicability was stated to be revised in improved TS 2.1.1 to not only include when the reactor is in "operation" or critical, but also when in MODE 2 and subcritical. ITS Mode 2 is critical operation. Clarify justification 2.i.

2.0 Q2 The safety limit specification references on page 2.1-3 list the FSAR and a NRR staff safety evaluation for the 95/95 fuel cladding damage margin. These references are deleted. Justify the change. Why did references change to UFSAR from FSAR?

3. Technical Specification 2.2

i. The Applicability was revised to "MODES 1, 2, 3, 4, and 5." The proposed Applicability does not require this Safety Limit (SL) to be met when fuel is in the vessel with one or more reactor vessel head closure bolts less than fully tensioned or with the head removed. With the reactor head bolts less than fully tensioned, it is highly unlikely that the RCS can be pressurized greater than the SL pressure due to the low temperature over-pressure protection requirements. With the head removed, it is not possible to pressurize the RCS greater than the SL pressure. This is a Ginna TS Category (v.b.2) change.

2.0 Q3 The safety limit specification references on page 2.2-2 list the FSAR for the RCS 110% limit of 2735 psig. These references are deleted. Justify the change. Why did references change to UFSAR from FSAR?

4. Technical Specification 2.3 - *UNREVIEWED, cannot locate CTS TS 2.3 Call Alan, ask if he reviewed any changes to these moved items.*

   i. This entire section was relocated to ITS Chapter 3.3, "Instrumentation." This is a Ginna TS Category (i) change.

   ii. TS 2.3 - Various limiting safety system settings (LSSS) are addressed as "Trip Setpoints," "Allowable Values," or "Applicable Modes" (as permissives) for their respective Reactor Trip System (RTS) instrumentation Functions in new LCO 3.3.1. Specific changes to the LSSS are discussed below for each of the associated Functional Units. This is a Ginna TS Category (i) change.

   iii. TS 2.3.1.2.d and TS 2.3.1.2.e - Various parameters used in the methodology for determining the Overtemperature ΔT and the Overpower ΔT Functions were not added to the specifications. These parameters are associated with variables which may change as a result of a reload analysis and are relocated to the COLR. This is a Ginna TS Category (iii) change.

   iv. TS 2.3.3.1, TS 2.3.3.2, and Figure 2.3-1 - The LSSS for the loss of voltage and degraded voltage functions were revised to provide a minimum Trip Setpoint value. Criteria for the establishment of equivalent values based on measured voltage versus relay operating time was relocated to the bases for LCO 3.3.4. This is a Ginna TS Category (iii) change.

   v. TS 2.3.1.2.g - The LSSS for the RCP underfrequency Functions was not added to the new specifications. This is justified in Reference 44 which shows that this trip function, though installed at Ginna Station, is not required or applicable based on the offsite power source design. This setpoint and requirement are relocated to the TRM. This is a Ginna TS Category (iii) change.

55. Technical Specification 6.7

   i. TS 6.7.1.a - The initial operator actions for Safety Limit (SL) violations were revised as follows: a. For violation of the Reactor Core or RCS Pressure SL in MODES 1 and 2, the requirement to immediately shutdown the reactor (effectively to be in MODE 3) was revised to allow 1 hour to restore compliance and place the unit in MODE 3. Immediately shutting down the reactor could infer action to immediately trip the reactor. The revision provides the necessary time to shutdown the unit in a more controlled and orderly manner than immediately tripping the reactor which could result in a plant transient. The proposed time continues to minimize the time allowed to operate in MODE 1 or 2 with a SL not met. This is a Ginna TS Category (v.b.44) change.

   b. For violation of the RCS Pressure SL in MODES 3, 4, and 5, an additional action was added which requires restoring compliance with the SL within 5 minutes. Specifying a time limit for

operators to restore compliance provides greater guidance to plant staff. This is a Ginna TS Category (v.a) change.

ii. TS 6.7.1.b - The requirement for notification to management personnel and the offsite review function of a SL violation was not added to the new specifications. Notification requirements are relocated to the TRM. This is a Ginna TS Category (iii) change. The requirement for notification to the NRC of a SL violation was not added to the new specifications since this requirement is denoted in 10 CFR 50.36 and 10 CFR 50.72. This is a Ginna TS Category (ii) change.

2.0 Q4 These generic changes require a staff approved traveler.

iii. TS 6.7.1.c - The requirement that a Safety Limit Violation Report be prepared was not added to the new specifications. This is a duplication of requirements denoted in 10 CFR 50.36 and 10 CFR 50.73. This is a Ginna TS Category (ii) change. The requirement for the onsite review committee to review the Safety Limit Violation Report was not added to the new specifications. The responsibilities of the onsite review committee are relocated to the TRM. This is a Ginna TS Category (iii) change. SL violations are reported to the NRC in accordance with the provisions of 10 CFR 50.73. The details describing the requirements for content of the Safety Limit Violation Report is, therefore, controlled by the provisions of 10 CFR 50.73 and does not need to be specified in TS. This is a Ginna TS Category (ii) change.

2.0 Q5 These generic changes require a staff approved traveler.

iv. TS 6.7.1.d - The requirement for the submittal of a Safety Limit Violation Report to the NRC was not added to the new specifications. This is a duplication of requirements denoted in 10 CFR 50.36 and 10 CFR 50.73. This is a Ginna TS Category (ii) change. The requirement for the submittal of a Safety Limit Violation Report to management personnel and the offsite review function was not added to the new specifications. The distribution of reports submitted in accordance with 10 CFR 50.73 are relocated to the TRM. This is a Ginna TS Category (iii) change.

2.0 Q6 These generic changes require a staff approved traveler.

5. Technical Specification 3.0

i. A new section LCO 3.0.1 was added which explains the use of the Applicability statement in the new TS. This section does not provide any new requirements. Previous guidance provided by the NRC (e.g., Generic Letter 87-09) regarding the intent and interpretation of existing Specifications is consistent with LCO 3.0.1. This LCO provides clarifying and descriptive information for the LCOs applicability consistent with the use and format of the ITS. This is a Ginna TS Category (v.c) change.

ii. A new section LCO 3.0.2 was added which explains the use of the associated ACTIONS upon discovery of a failure to meet an LCO in the new TS. This section does not provide any new requirements. Previous guidance provided by the NRC (e.g., Generic Letter 87-09)

regarding the intent and interpretation of existing Specifications is consistent with LCO 3.0.2. This LCO provides clarifying and descriptive information for the LCOs applicability consistent with the use and format of the ITS. This is a Ginna TS Category (v.c) change.

iii. TS 3.0.1 - This was revised to clarify the use of the actions that must be implemented when an LCO is not met and (1) an associated Required Action and Completion Time is not met and no other Condition applies, or (2) the condition of the plant is not specifically addressed by the associated ACTIONS. The current requirement that the LCO time limits apply if they are more limiting that those required by LCO 3.0.3 is deleted and an expanded discussion is provided in the Basis to clarify the applicability of this requirement. This section does not provide any new requirements. The clarifications and examples are based on the use the new ITS format. This is a Ginna TS Category (v.c) change.

iv. A new section LCO 3.0.4 was added which explains the limitations on changes in MODES or other specified conditions in the Applicability when an LCO is not met in the new TS. This section provides new requirements consistent with the use and format of the ITS. This is a Ginna TS Category (iv.a) change.

v. A new section LCO 3.0.5 was added to provide an exception to LCO 3.0.2 for instances where restoration of inoperable equipment to an OPERABLE status could not be performed while continuing to comply with Required Actions. Many Technical Specification ACTIONS require an inoperable component to be removed from service, such as: maintaining an isolation valve closed or tripping an inoperable instrument channel. To allow the performance of SRs to demonstrate the OPERABILITY of the equipment being returned to service, or to demonstrate the OPERABILITY of other equipment which otherwise could not be performed without returning the equipment to service, an exception to these Required Actions is necessary. LCO 3.0.5 is necessary to establish an allowance that, although informally utilized in restoration of inoperable equipment, is not formally recognized in the present Specifications. Without this allowance certain components could not be restored to OPERABLE status and a plant shutdown would ensue. Clearly, it is not the intent or desire that the Technical Specifications to preclude the return to service of a suspected OPERABLE component to confirm its OPERABILITY. This allowance is deemed to represent a more stable, safe operation than requiring a plant shutdown to complete the restoration and confirmatory testing. Since this requirement is informally utilized and has no licensing basis, this section is considered to provide new requirements consistent with the use and format of the ITS. This is a Ginna TS Category (iv.a) change.

vi. TS 3.0.2 - This was deleted and replaced by LCO 3.0.6 which provides guidance regarding the appropriate ACTIONS to be taken

when a single inoperability (e.g., a support system) also results in the inoperability of one or more related systems (e.g., supported system(s)). Since its function is to clarify existing ambiguities and to maintain actions within the realm of previous industry interpretations and NRC positions, this new provision does not provide any new requirements. The information contained in TS 3.0.2 was relocated to LCO 3.8.1 which allows one power source to a safeguards bus and a redundant safety features on a second bus to be inoperable for 12 hours versus 1 hour. This change is consistent with NUREG-1431. These are Ginna TS Category (v.c) and (i) changes, respectively.

vii. A new section LCO 3.0.7 was added to provide guidance regarding Test Exceptions for LCO 3.1.8. This LCO allows specified Technical Specification requirements to be changed (i.e., made applicable in part or whole, or suspended) to permit the performance of special tests or operations which otherwise could not be performed. If this Test Exception LCO did not exist, many of the special tests and operations necessary to demonstrate select plant performance characteristics, special maintenance activities and special evolutions could not be performed. This Specification eliminates the confusion which would otherwise exist as to which LCOs apply during the performance of a special test or operation. Without this specific allowance to change the requirements of another LCO, a conflict of requirements could be incorrectly interpreted to exist. This section does not provide any new requirements. This LCO provides clarifying and descriptive information for the LCOs applicability consistent with the use and format of the ITS. This is a Ginna TS Category (v.c) change.

27. Technical Specification 4.0

i. A new section SR 3.0.1 was added which establishes the requirements and limitations that the SRs must meet during the MODES or other specified conditions in the Applicability for which the requirements of the LCO apply.

ii. TS 4.0 was revised to clarify the basic application of the 25% extension to routine surveillances consistent with the use and format of the ITS.

iii. A new section SR 3.0.3 was added which establishes the flexibility to defer declaring affected equipment inoperable or an affected variable outside the specified limits when a Surveillance has not been completed within the specified Frequency.

iv. A new section SR 3.0.4 was added which establishes the requirement that all applicable SRs must be met before entry into a MODE or other specified condition in the Applicability.

Section 2.0 Improved TS

5. ITS 2.1.1

i. SL 2.1.1 was revised to delete the reference to the highest loop average. This is base on Ginna Station designed with two loops. The RCS average temperature trips the reactor on coincidence two-out-of-four signals, with two channels per loop. This is an ITS Category (iv) change.

ii. ITS Figure 2.1.1-1 was replaced with the existing Technical Specification Figure 2.1-1. The Reactor Core Safety Limits (SLs) figure reflects the acceptable operating regions of the plant and is consistent with the current safety analysis. This is an ITS Category (iv) change.

iii. The bases were revised as follows (these are ITS Category (iv) changes):

a. Ginna Station was designed and built prior to the issuance of the GDC contained in 10 CFR 50, Appendix A. However, the draft GDC issued by the Atomic Industrial Forum (AIF) in 1967 were utilized in the design of Ginna Station. The bases were revised to reflect this difference.

b. The discussion of DNB criteria was revised and expanded to reflect plant-specific considerations.

c. Various wording changes were made to improve the readability and understanding of the bases and to reflect plant-specific considerations.

2.0 Q7 Bases insert 2.1.3 for page B 2.0-3 is incomplete; provide a discussion of the second slope of figure 2.1.1-1 and correct the awkward wording of the last sentence, "such that overtemperature the hot leg steam quality....".

2.0 Q8 Status: reject Bases B 2.0-8 proposed deletion of safety limit USAR reference.

d. The listing of the automatic functions relating to the enforcement of the reactor core SLs was revised consistent with the changes proposed in ITS Chapter 3.3.

2.0 Q9 Explain why the pressurizer trip on high and low pressure are deleted and not otherwise discussed in the Bases. The NUREG markup includes these trips as function 7. Also justify deleting the enthalpy discussion.

e. Ginna Station was analyzed for the locked rotor event to show that the peak reactor coolant system pressure remains below 120% of design. The bases were revised to reflect this difference.

f. The additional words to the reference allow for approved exceptions.

g. A typographical or minor clarification is identified.

iv Incorporation of approved Traveller WOG-01, C.1.

v. Incorporation of approved Traveller BWR-11, C.10 (Rev.1).

6. ITS 2.2

i. SL 2.2.3 - This section and associated bases were not added. The section duplicates a reporting requirement described in 10 CFR 50.36(c)(1) and 10 CFR 50.72. The deletion of this section eliminates the need to change technical specifications when there are rule changes. Since RG&E must meet the applicable requirements contained in the Code of Federal Regulations, or have NRC approved exemptions, there are sufficient regulatory controls in place to allow elimination of duplicate requirements from technical specifications. The implementation of these requirements are contained in procedures or other controlled licensee controlled documents. This change is consistent with Traveller WSTS-2, C.1. This is an ITS Category (i) change.

2.0 Q10 These generic changes require a staff approved traveler.

ii. SL 2.2.4 - This section and associated bases were not added. This requirement for the notification of management personnel and plant safety review committees is similar to the requirements removed from other sections of the ITS (i.e., Chapter 5.0 - "Administrative Controls" for the Onsite and Offsite review function) and relocated to other licensee controlled documents. The relocation of these items will enable RG&E to more efficiently maintain the requirements under existing regulations and reduce the need to request technical specification changes for issues which do not affect public safety. This change is consistent with Traveller WSTS-2, C.1.

2.0 Q10 These generic changes require a staff approved traveler. This is an ITS Category (i) change. As a result of this TS change, approved Traveller WOG-21, C.1 and C.2 were not incorporated.

iii. SL 2.2.5 - This section and associated bases were not added. The section, in part, duplicates a reporting requirement described in 10 CFR 50.36(c)(1) and 10 CFR 50.73. The deletion of this requirement eliminates the need to change technical specifications when there are rule changes. Since RG&E must meet the applicable requirements contained in the Code of Federal Regulations, or have NRC approved exemptions, there are sufficient regulatory controls in place to allow elimination of duplicate requirements from technical specifications. The implementation of these requirements are contained in procedures or other controlled licensee controlled documents. The section also requires distribution of the safety violation report to certain management personnel and plant safety

review committees. This requirement is similar to the requirements removed from other sections of the ITS (i.e., Chapter 5.0 - "Administrative Controls" for the Onsite and Offsite review function) and relocated to other licensee controlled documents. The relocation of these items will enable RG&E to more efficiently maintain the requirements under existing regulations and reduce the need to request technical specification changes for issues which do not affect public safety.

2.0 Q11 These generic changes require a staff approved traveler. This change is consistent with Traveller WSTS-2, C.1. As a result of this change, approved Travellers WOG-21, C.1 and C.2, and BWR-02, C.8 and C.8a were not incorporated. This is an ITS Category (i) change.

iv. SL 2.2.6 - This section and associated bases were not added. The section duplicates a requirement described in 10 CFR 50.36(c)(1). The deletion of this section eliminates the need to change technical specifications when there are rule changes. Since RG&E must meet the applicable requirements contained in the Code of Federal Regulations, or have NRC approved exemptions, there are sufficient regulatory controls in place to allow elimination of duplicate requirements from technical specifications. The implementation of these requirements are contained in procedures or other controlled licensee controlled documents.

2.0 Q12 These generic changes require a staff approved traveler. This change is consistent with Traveller WSTS-2, C.1. This is an ITS Category (i) change.

v. Various wording changes were made to improve the readability and understanding of the bases and to reflect plant-specific considerations. This is an ITS Category (iv) change.

<u>Section 3.0 Improved TS</u>

7. ITS 3.0

i. For completeness LCO 3.0.7 should also be referenced in LCO 3.0.1. As discussed in approved Traveller NRC-03, C.5, LCO 3.0.7 addresses a situation when an LCO requirement is allowed not to be met. This is similar to LCO 3.0.2 which addresses the requirement of meeting the associated ACTIONS when not meeting a Limiting Condition for Operation. This change is consistent with Traveller WSTS-3, C.1. This is an ITS Category (iii) change.

3.0 Q1 These generic changes require a staff approved traveler.

ii. Incorporation of approved Traveller BWOG-01, C.10.

iii. Incorporation of approved Traveller BWR-02, C.11.

iv. Incorporation of approved Traveller BWR-05, C.7.

v. Incorporation of approved Traveller BWOG-09, C.26 (Rev 1).

vi. Incorporation of approved Traveller NRC-03, C.5 (Rev 1). Minor changes are made to reflect the actual proposed new TS. These are ITS Category (iv) changes.

vii. Incorporation of approved Traveller BWR-02, C.10.

viii. Incorporation of approved Traveller BWR-25, C.3.

ix. Incorporation of approved Traveller BWR-05, C.10 (Rev 2). Several wording changes were made to increase understanding. These changes do not alter the indent of the Traveller. These are ITS Category (iv) changes.

x. Incorporation of approved Traveller BWR-05, C.12.

xi. Incorporation of approved Traveller BWR-05, C.15 and WOG-01, C.2.

xii. Incorporation of approved Traveller BWR-05, C.13 (Rev 2).

xiii. A typographical or minor clarification is identified. This is an ITS Category (iv) change.

3.0 Q2 These proposed change to Bases page B 3.0-10 is generic and requires a staff approved NEI traveler.

3.0 Q3 The proposed change to LCO 3.0.3 Bases on page B 3.0-4 is generic and requires a staff approved NEI traveler.

xiv. Incorporation of approved Traveller BWOG-01, C.11.

xv. Incorporation of approved Traveller BWR-07, C.1 (Rev 1).

xvi. LCO 3.0.3 and the bases were revised to remove the requirement to initiate action to shutdown the plant within 1 hour. Instead, the bases require the Shift Supervisor to evaluate the plant conditions to determine if a plant shutdown should be initiated immediately, or deferred if the condition which caused entry into LCO 3.0.3 is expected to be restored within a reasonable period of time. However, the time restrictions in LCO 3.0.3 for MODE changes must always be met. This change provides the plant management and operating staff with the flexibility to determine the best course of action should LCO 3.0.3 be entered. This change is consistent with Traveller WSTS-3, C.2. This is an ITS Category (i) change.

3.0 Q4 The proposed change to LCO 3.0.3 on page 3.0-1 is a generic iSTS change and requires a staff approved NEI traveler.

3.0 Q5 The proposed change to LCO 3.0.3 Bases on page B 3.0-3 is a generic iSTS change that requires a staff approved traveler.

xvii. The bases for SR 3.0.1 were revised to clarify that credit may be taken for unplanned events that satisfy the performance of an SR. This change allows the deletion of multiple Notes within the SRs in Chapter 3 which state the same thing. The change is consistent with Traveller WSTS-3, C.3. This is an ITS Category (iii) change.

3.0 Q6 The proposed change to SR 3.0.1 on page 3.0-9 is a generic change to the iSTS that requires a staff approved traveler

xviii. LCO 3.0.4 and the bases were revised to provide greater clarity and consistency with actual Ginna Station practices. First, the details of why exceptions are allowed to LCO 3.0.4 was deleted from the LCO and relocated to the bases. This change provides consistency with LCO 3.0.3 and SR 3.0.2. Second, the bases were revised to provide easier readability. In addition, current Ginna Station operating practices prevent any MODE change, up or down, with inoperable equipment required for the MODE desired to be entered. Therefore, the discussion that LCO 3.0.4 does not prevent MODE changes during a "normal shutdown" conflicts with these practices and was deleted. These are ITS Category (iii) changes.

3.0 Q7 The proposed change to LCO 3.0.4 on page 3.0-2 and Bases page B 3.0-5, B 3.0-6, B 3.0-10 are generic changes to the iSTS that requires a staff approved traveler.

<u>Sections 3.1, 3.2, 3.4 & 3.5 TS</u>

6. Technical Specification 3.1.1

i. TS 3.1.1.1.b - This requirement was changed to require entry into MODE 1 $\leq$ 8.5% RTP within four hours versus an immediate power reduction under administrative control. This change defines a specific number of hours to reach this condition which provides greater clarity to the operators. The remaining actions as specified by TS 3.1.1.1.b were relocated to LCO 3.4.5 and are discussed in 6.ii below. This is a Ginna TS Category (v.a) change.

3.4Q1	The Completion time of 4 hours discussed above does not agree with NUREG-1431 Rev 1 or Ginna ITS which specifies six hours. Explain this difference.

ix. TS 3.1.1.5.a - The lower limit for pressurizer water level (12%) was not added. This lower limit was related to the previous Safety Injection actuation logic which required a coincident low pressurizer level and low pressurizer pressure trip. This logic was modified as a result of IE Bulletin 79-06A (Ref. 45) to eliminate the coincident low pressurizer level trip (Ref. 46) such that the setpoint is no longer used in an UFSAR Chapter 15 accident

analysis. Therefore, the low pressurizer water level setpoint is not required. This is a Ginna TS Category (v.b.3) change.

3.4Q2	This change is identified as a less restrictive change, and it does delete a requirement. (Should this change have been made when the physical change to the trip logic was made?) Provide an explanation as to why this change is a less restrictive.

xii. TS 3.1.1.3.a and 3.1.1.3.b - These requirements were not added to the new specifications since the pressurizer safety valves do not provide overpressurization protection during Cold Shutdown and Refueling conditions. This is provided by the low temperature overpressure protection (LTOP) requirement as specified in current TS 3.15 and new LCO 3.4.12. Since the pressurizer safety valves do not perform a safety function during these low MODES of operation, these requirements were not retained. These changes also supersede those proposed in Reference 60. This is a Ginna TS Category (v.b.4) change.

3.4Q3	Provide an explanation for this being a less restrictive change. You state that the pressurizer safety valves never performed the safety function for protecting the RCS from low temperature overpressurization, yet the valves were there (operable) in the lower MODES, why then could these valves not protect the RCS from high pressure at low temperature? What is the importance of using Reference 60 in the discussion of change justification?

xvii. TS 3.1.1.3.c - This was revised to change the pressurizer safety valve lift settings from 2485 psig ± 1% to 2485 psig + 2.4%, -3%. The valve lift settings are required to be set to within ± 1% following testing; however the OPERABILITY tolerances have been revised. The increased OPERABILITY tolerances have been evaluated in the most limiting pressure transients for Ginna Station (i.e., loss of external load and locked rotor events) and found to result in acceptable results with respect to the safety limit values. This change is a result of an event in which the pressurizer safety valves were found to have drifted outside the existing ± 1% tolerance band following testing (Ref. 58). Revising the OPERABILITY tolerances will reduce the potential for future LERs for an issue which has been demonstrated to remain within the accident analysis requirements. This is a Ginna TS Category (v.b.45) change.

3.4Q4	This justification should be separated from reducing the frequency of LERs. This is not a safety analysis basis for changing the tolerances. The argument on the transient analysis results has merit and should be expanded to indicate how these values meet code setpoint requirements. Provide the details of the analysis and any explanation of why this change is considered within the scope of conversion to the ISTS.

7. ii. TS 3.1.2.1.b - The requirement for periodically recalculating the RCS temperature and pressure curves and the RCS heatup and cooldown curves and limits was relocated from technical specifications to the PTLR. A periodic review is already required by 10 CFR 50, Appendix H which does not need to be restated within the technical specifications. This is a Ginna TS Category (iii) change.

3.4Q5	The PTLR itself does not specifically address the requirement to periodically recalculate the heatup and cooldown curves and limits. Identify the location of this requirement in the improved TS even though this requirement may be contained in some of the referenced material. (As stated above, a periodic surveillance program is required by 10 CFR 50, Appendix H which specifies requirements for specimen withdrawals and for determining if TS need to be changed, but Appendix H is non-specific on that point.)

iv. TS 3.1.2.2 - This was not added since this temperature limit is not required for safe operation. All necessary heatup and cooldown rates are relocated to the PTLR while new LCO 3.4.1 provides limits on RCS pressure, temperature, and flow. This is a Ginna TS Category (v.b.5) change.

3.4Q6	This change is not adequately justified; i.e., "not required for safe operation" is not adequate. Provide justification for deletion of this requirement.

8. i. TS 3.1.3.1 - This was revised to raise the minimum temperature for criticality from 500°F to 540°F. This change was made to correct a discrepancy between the definition of reactor operating modes and this requirement. Currently, Ginna Station TS 1.2 defines Hot Shutdown as Reactivity $\leq -1\ \Delta k/k\%$ and $T_{avg} \geq 540°F$. In order to achieve criticality at 500°F, the Hot Shutdown condition would have to be directly bypassed. A value of 540°F was selected for the new minimum temperature for criticality based on previous operating experience during startup conditions. This is a Ginna TS Category

(v.a) change.

3.4Q7	Provide additional justification to explain how "based on previous operating experience" relates to the new minimum temperature for criticality and relate it to operating temperature, if appropriate.

iii. TS 3.1.3.3 - The existing action statement was revised to require that the plant be in MODE 2 with $k_{eff} < 1.0$ within 30 minutes if T_{avg} for one or both RCS loops was < 540°F versus subcritical by an amount equal to or greater than the potential reactivity due to depressurization. The new requirement provides clear and precise instructions to operations and ensures that the plant is quickly brought to a condition in which the LCO is no longer applicable. This is a Ginna TS Category (v.c) change.

3.4Q8	Provide an explanation for why it is acceptable to delete the requirement to insert sufficient negative reactivity to offset the effects of depressurization since this is significantly more reactivity than required to simply insert enough reactivity to become just subcritical.

v. TS 3.1.3.1 - This was revised to reference cycle specific MTC requirements in the COLR. This change is consistent with NUREG-1431 and provides flexibility during reload core design. The MTC maximum upper limit described in TS 3.1.3.1 remains the same in ITS LCO 3.1.4. This is a Ginna TS Category (iii) change.

3.4Q1	Explain what elements are relocated to the COLR program and what elements are relocated outside the TS to owner controlled documents.

9. i. TS 3.1.4.4 - This specification was revised to only require shutdown to MODE 3 with $T_{avg} < 500°F$ within 8 hours versus Cold Shutdown within 40 hours consistent with the LCO Applicability. This is a Ginna TS Category (v.c) change.

3.4Q9	Provide an explanation discussing how this is a (v.c) change since the revised LCO does not require going to cold shutdown and existing TS do.

10. i. TS 3.1.5.1.1 - Added a new requirement for the containment sump "A" level or pump actuation per LCO 3.4.15. This leakage detection system replaces the containment humidity detectors and the air

cooler condensate flow monitor. The containment humidity detectors do not meet the required leakage rate detection capability of 1.0 gpm within 4 hours as required by Generic Letter 84-04 (Ref. 19). In addition, the containment humidity detectors are recommended by RG 1.45 (Ref. 17) to only be used as an alarm or indirect indication of leakage to containment and not as a separate method of detecting leakage. The remaining leakage detection systems provide adequate monitoring as discussed in the new bases and Section C, item 46. These are Ginna TS Category (v.a) changes.

3.4Q10	Provide a brief explanation of the sump pump monitor alarms. Discuss whether the alarms actuate on pump actuation frequency, total pumping time, and sump level, and discuss how leakage is quantified.

iv. TS 3.1.5.2.2.c - The requirement to commence a reactor shutdown with excessive SG tube leakage was revised to allow an additional 4 hours to correct administrative and other similar discrepancies in the Steam Generator Tube Surveillance Program consistent with LCO 3.4.13.B. Requiring a reactor shutdown for most administrative errors is not prudent based on the increased risk for a transient while changing MODES. However, if the integrity of the tube is determined to be inadequate, a reactor shutdown will continue to be immediately initiated. Also, the requirement to perform a SG inspection with excessive leakage if an inspection has not been performed within the last 6 months was not added to the new specifications. Any SG inspections will be determined as part of the corrective actions necessary to repair the leaking tube and in accordance with the Steam Generator Tube Surveillance Program. Since LCO 3.0.4 applies to this LCO, the plant cannot go above MODE 5 without verifying that the SG tube integrity is acceptable. These are Ginna TS Category (v.b.8) changes.

3.4Q11	The reason for adding Condition B according to the Bases is, "to allow an additional 4 hours to correct administrative and other similar discrepancies in the Steam Generator Tube Surveillance Program .. .". The reason for Condition B is not clear. It should not be associated with SG leakage as is done in this justification. The lead-in sentence to this item states that "the requirement to commence a reactor shutdown with excessive leakage was revised to allow an additional 4 hours" is not associated with steam generator leakage. Explain how the proposed action to declare the SG inoperable if there is a program deviation is relevant to LCO 3.4.13 requirements? Provide a better explanation and safety basis justification on the need for Condition B.

3.4Q12	Justify changing the existing TS requirement from "be at hot shutdown within 6 hours and at an RCS temperature less than 350°F within the following 6 hours" to "Be in MODE 3"in 6 hours and "Be MODE 5 in 36 hours."
3.4Q13	Justify why and how the Steam Generator Tube Rupture Program replaces the requirement to perform a SG inspection if one has not been performed in last 6 months.

12. i. TS 3.2.5 - The requirement was revised to require placing a charging pump in pull-stop within 1 hour regardless of the status of the RHR pumps or the MODE. This is a conservative change which provides direct operator guidance to perform an action within a defined time period. Also, these requirements were relocated to the LTOP specification to consolidate all related requirements. The verification of the charging pump status every 12 hours was also not added since the plant is required to be in a depressurized and vented condition within 8 hours which removes the need to isolate a charging pump (i.e., a 1.1 square inch vent can mitigate a charging/letdown mismatch event). These are Ginna TS Category (v.a), (i), and (v.c) changes, respectively.

3.4Q14	Provide appropriate design basis and safety analysis basis justification why Ginna needs only to protect against a single charging pump starting for vented RCS conditions when there are 3 operable charging pumps.

13. i. TS 3.3.1.1.b and 3.3.1.3 - LCO 3.5.1 Condition A was added which allows 72 hours to restore accumulator boron concentration to within acceptable limits. The ITS bases state that allowing a longer period of time to correct boron concentration is acceptable since the volume of water in the accumulators is the critical feature. Attempting to correct boron concentration within the current 1 hour limit would create a significant burden on the operations staff. Therefore, the current 1 hour LCO was only maintained for accumulator pressure and volume. In addition, the accumulator boron concentration limits were relocated to the COLR since these values can change due to refueling cycle changes. These are Ginna TS Category (v.b.9) and (iii) changes, respectively.

3.5Q1	Provide additional justification for the change from a 1 hour to 72 hours TS limit to adjust accumulator boron concentration by documenting the operational hardship with the typical time needed to complete a boron adjustment and to achieve an acceptable concentration. Also, include any safety analysis basis that supports the proposed change.

vii. TS 3.3.1.1.b - The bases for TS 3.3 were revised to update the specified water volume contained in the accumulator with respect to the 50% and 82% levels. The required levels specified in TS 3.3.1.1.b have not been changed, only the corresponding water volumes provided in the bases. The new values are consistent with those used in the accident analysis (see COLR, Table 1). This is a Ginna TS Category (v.c) change.

3.5Q2	The Bases for ITS LCO 3.5.1, Accumulators, do not provide the accumulator volume assumed in the accident analysis as stated. Also, could not find this value in existing TS 3.3 Bases as indicated. Provide an explanation that describes how operators will have access to these volumes.

20. xii. TS 3.10.4.2 and TS 3.10.4.3 - These were revised to remove conditions of rod inoperability due to being immovable. The ITS Bases state that the rods are considered to be OPERABLE if they are trippable even if they are immovable. Reference to full length rods was also removed since there are no part length rods in the reactor core. This is a Ginna TS Category (v.c) change.

3.1Q2	Provide an safety basis explanation describing how the change to redefine rod OPERABILITY is an administrative change, especially since the existing TS would require an immovable rod to be declared inoperable and put the plant on a shutdown track.

xiii. TS 3.10.4.3.2 - This was revised to remove the requirement to declare a misaligned rod inoperable when the rod cannot be restored to within the alignment limits in 1 hour. The ITS Bases state that the rods are considered to be OPERABLE if they are trippable even if they are immovable. This is a Ginna TS Category (v.a) change.

3.1Q3	Provide an safety basis explanation describing how the change to define a misaligned rod to be OPERABLE, even if unable to restore alignment within one hour, is a more restrictive change. Existing TS would require a misaligned rod to put the plant on a power reduction track unless restored to within limits in one hour.

xvi. TS 3.10.4.3.2.b and TS 3.10.4.3.2.c - These were revised to remove the requirement to reduce the high neutron flux trip setpoint to ≤ 85% RTP when the power level is reduced to ≤ 75% RTP. This required action is deleted based on agreements between the NRC and the owners groups and is consistent with WCAP-13029 (Ref. 50) which states that the safety analyses results would not be significantly affected by changes to their initial assumptions as a result of increased peaking factors caused by rod misalignment. Additionally, the peaking factor limit verification within 72 hours and the re-evaluation of the safety analysis within 5 days that are required by this specification provide further assurance that the assumptions made in the safety analysis are preserved. This is a Ginna TS Category (v.c) change.

3.1Q4	Provide an safety basis explanation as to why this change is an administrative change since the trip setpoints are no longer required to be reset downward. Resetting downward will provide an earlier trip which is in the conservative direction.

xvii. TS 3.10.4.4 - This was revised to include an action to verify SHUTDOWN MARGIN or initiate boration within 1 hour when more than one rod is out of alignment. The ITS Bases state that 1 hour is a reasonable time based on the time required for potential xenon distribution and the low probability of a accident. This is a Ginna TS Category (v.a) change.

3.1Q5	Provide a rationale for the more restrictive change, (v.a) category applied to this item. It appears to be less restrictive since the new requirement allows an hour to determine SDM or to borate and restore the margin if need be, but still requires the plant to be in hot shutdown in 6 hours.

xviii. TS 3.10.5.1 - This was revised to add an action statement to clarify that if more than one MRPI is inoperable per group for one or more groups or more than one demand position indicator per bank is inoperable for one or more banks then

the plant must enter 3.0.3 immediately. This is a Ginna TS Category (v.a) change.

3.1Q6	NUREG-1431 does not have a specific Condition for entry into LCO 3.0.3 as ITS LCO 3.1.7, Rod Position Indication does, but it is implicit from the generic LCO 3.0.3 discussion of requirements that LCO 3.0.3 would apply if the condition exists and the specific LCO does not so state it. Explain the reason for inclusion of statement to enter into LCO 3.0.3.

xx. TS 3.10.2.1 - This was revised to require measurement of the power distribution after each fuel reloading prior to operation of the plant at or above 75% RTP instead of prior to 50% RTP consistent with ITS. This requirement ensures that the design limits are not exceeded when RTP is achieved, since peaking factors are usually decreased as power increases. Requiring this surveillance at 75% versus 50% still provides the necessary margin to ensure that design safety limits are not exceeded and provides the operator with more flexibility during power ascension following a refueling. This is a Ginna TS Category (v.b.25) change.

3.2Q1	Provide documentation of the conclusions for why this less restrictive change is acceptable. What is the safety basis explanation for the proposal to ascend to 75% RTP without confirming that fuel design safety limits are not exceeded? Explain the statement, "since peaking factors are usually decreased as power is increases" and what makes this a factual statement.

xxv. TS 3.10.2.2 - This was revised to allow 72 hours (instead of 24 hours) to reduce the Overpower ΔT and the Overtemperature ΔT trip setpoints when F_Q or $F_{\Delta H}$ is not within limits consistent with NUREG-1431. This section was also revised to include a Completion Time of 72 to reduce the Power Range Neutron Flux High trip setpoints. These actions provide further protection against the consequences of severe transients with unanalyzed power distributions. The 72 hours is sufficient considering the small likelihood of a severe transient in this time period and the initial prompt reduction in THERMAL POWER. This is a Ginna TS Category (v.b.27) change.

3.2Q2	Provide an safety basis explanation to further justify the change from 24 hours to 72 hours to adjust these setpoints when the hot channel factor limits are exceeded.

28.i.b 6. SR 3.1.6.1 - Requires verification within 4 hours prior to criticality that the critical control bank position is within limits in the COLR.

3.1Q7	Provide an explanation why the "within 4 hours" is not included in the Surveillance Requirement statement or the Frequency.

8. SR 3.1.8.4 - Requires verification every 30 minutes during MODE 2 PHYSICS TESTS that THERMAL POWER ≤ 5% RTP. Verification of the THERMAL POWER level will ensure that the initial conditions of the safety analyses are not violated.

3.1Q8	The SR number in the ITS is SR 3.1.8.3 instead of SR 3.1.8.4 as stated above. Provide a confirmation of the correct number.

28.iv.a. Table 4.1-4, Functional Unit #1 was revised as indicated in ITS SR 3.4.16.1 to only require verification of reactor coolant gross specific activity once every 7 days when $T_{avg} \geq 500°F$ versus once every 72 hours above Cold Shutdown (i.e., $T_{avg} \geq 200°F$). The increased surveillance interval is acceptable based on the small probability of a gross fuel failure during the additional 4 days. Fuel failures are more likely to occur during startup or fast power changes and not during steady state power operation during which the majority of sampling is performed. Gross fuel failures will also result in Letdown radiation alarms and possibly containment radiation alarms providing additional operator indication. Only requiring this surveillance when $T_{avg} \geq 500°F$ provides consistency with the LCO Applicability. This is a Ginna TS Category (v.b.34) change.

3.4Q15	The decrease in the activity determination interval needs supporting justification. Provide documentation concerning how the alarms will protect the activity limit during this increased surveillance interval.

28.iv.c Table 4.1-4, Functional Unit #3 was revised per ITS SR 3.4.16.3 to delay determination of $\bar{E}$ until 31 days after a minimum of 2 effective full power days and 20 days of MODE 1 operation following the reactor being subcritical for ≥ 48 hours. The 31 days was added to ensure that radioactive materials are at equilibrium in order to provide a true representative sample for $\bar{E}$ determination and eliminate possible false samples. This is a Ginna TS Category (v.c) change.

3.4Q16	Explain why this is an administrative change, since it changes the sampling and analysis technical requirements.

30. iv. TS 4.3.3.1, 4.3.3.2, and 4.3.3.3 - The requirement that the leakage tests be performed with a minimum test differential pressure of 150 psid was not added to the new specifications. The Bases for new LCO 3.4.14 reference ASME; Section XI (Ref. 53) which provides acceptable guidance for performing these leakage tests. This includes adjusting the observed leakage rates for tests that are not conducted at the maximum differential pressure by assuming that leakage is directly proportional to the pressure differential to the one half power. This is a conservative change in most cases since it requires that the PIVs be tested under the maximum differential pressure conditions. This is a Ginna TS Category (v.c) change.

3.4Q17	Provide a safety basis explanation supporting the statement that the proposed change is conservative in most cases since PIVs will be tested under maximum differential pressure conditions by adjusting observed leakage rates for tests not conducted at the maximum differential pressure. Identify those cases where the results would not be conservative when they are conducted at less than the maximum pressure differential.

v. TS 4.3.3.4 Specifies requirements for allowable leakage rate limits for PIVs. The allowed leakage rates for PIVs was adjusted from a single value for all valves to a value based on valve size consistent with SR 3.4.14.1 and SR 3.4.14.2. This change provides greater information of valve degradation and removes an unjustified penalty on larger valves (Ref. 54). This is a Ginna TS Category (v.c) change.

3.4Q18	Provide an safety basis explanation for why it is acceptable to change the allowable leakage limit to one based on valve size, and explain how this compares with the leakage limit in existing TS.

32. iii. TS 4.5.2.2.c - The test related to accumulator check valve testing for operability every refueling shutdown was relocated to the Ginna Station Inservice Testing program. The valves are currently partially stroke tested quarterly and refurbished every six years. Leakage associated with these check valves is addressed by SR 3.5.1.2. This is a Ginna TS Category (iii) change.

3.5Q3	Provide an explanation of how the leakage past these valves is addressed by ITS SR 3.5.1.2.

Section 3.3 TS

3.3Q1 - Attachment B, CTS 2.3.1.2.g, low reactor coolant pump frequency ≥ 57.5 Hz, is marked eliminated, citing 4.v. There is no justification 4.v. Provide justification for relocating the low reactor coolant pump frequency ≥ 57.5 Hz reactor trip to the Technical Requirements Manual. (J)

3.3Q2 - Table 3.3.1-1 in NUREG-1431 has a column labeled *Trip Setpoint* and a column labeled *Allowable Value*. Note 'a' to that table notes "Unit specific implementation may contain only *Allowable Values* depending on Setpoint Study methodology used by the unit." The Ginna ITS uses the *Trip Setpoint* column, referencing discussion 23.vii, which states the *Trip Setpoint* column is used in accordance with the setpoint methodology to reflect the licensee's nomenclature. It is noted that the submittal markup of NUREG-1431 includes both columns. NUREG-1431 allows the use of the *Allowable Value* column only, but not the *Trip Setpoint* column by itself. Provide additional bases for using only the *Trip Setpoint* column or revise ITS Table 3.3.1-1 to include the *Allowable Values*.

3.3Q3 - Attachment E, Page 4 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' has a listing CTS 2.3.2.2/ITS Table 3.3.1-1, 15.d. ITS Table 3.3.1-1 does not have a function 15.d. Explain the entry and justify the change.

3.3Q4 - CTS 2.3.3.2 defines the Loss of Power and degraded voltage settings (in conjunction with the limits shown in Figure 2.3-1), "measured" values, and "acceptable" values respectively. ITS SR 3.3.4.2 appears to use defined setpoints and time delays. The Bases states the degraded voltage relays have inverse time delay characteristics. Provide justification and documentation for the *Allowable Values* and *Trip Setpoints* of ITS SR 3.3.4.2, showing the specified *Allowable Values* and *Trip Setpoints* are adequate for the conversion to the ITS. Specifically address the acceptability of specifying the trip curve of the degraded voltage relays with a single point.

3.3Q5 - CTS 3.12.2 limits the reactor power to 90% of rated power if the excore detectors have not had current surveillance (calibration). Corresponding ITS SR 3.3.1.6 requires calibration before reaching 90% RTP following refueling if the surveillance was not completed within 92 EFPD, but imposes no corresponding limits on reactor power. Discuss this conversion and provide justification for the lack of the requirement to limit reactor power if the calibration of the excore detectors is not current.

3.3Q6 - CTS 4.4.7.2, a monthly calibration of the H_2 monitors is changed to a 24-month interval calibration in ITS SR 3.3.3.2, citing industry experience. Show, by historical calibration data, that the drift of the Ginna H_2 monitors supports a 24-month interval calibration cycle. Provide justification for the daily channel check (CTS 4.4.7.1) being changed to 31-days (ITS SR 3.3.3.1).

3.3Q7 - WCAP-14333, May 1995, is cited as justification for placing an inoperable channel in bypass for up to 12 hours while performing routine surveillance testing of other channels. Similarly, the same document is cited as justification for allowing 72 hours to restore the channel to OPERABLE status and 6 additional hours to reduce thermal power. Describe this basis, as this May 1995 document surely has not received NRC approval.

3.3Q8 - The CTS 3.6.4.2 requirement to go to hot shutdown if an inoperable hydrogen monitoring channel is not restored to operable status is changed to ITS LCO 3.3.3, Required Action C.1, to initiate preparation and submittal of a Special Report. Describe the intended Special Report, and the required time to submit it. Justify why this Special Report is an adequate action to take in lieu of hot shutdown.

3.3Q9 - The CTS 3.5.3.2 requirement to go to hot shutdown if an inoperable post-accident monitoring channel is not restored to operable status is changed to ITS LCO 3.3.3, Required Action C.1, to initiate preparation and submittal of a Special Report. Describe the intended Special Report, and the required time to submit it. Justify why this Special Report is an adequate action to take in lieu of hot shutdown.

3.3Q10- Attachment E, Page 5 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' has a listing New/ITS Table 3.3.1-1, 15/15.i.ff. Attachment A does not appear to have a justification 15.i.ff. Explain the entry and justify the change.

3.3Q11- Attachment E, Page 5 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' has a listing New/ITS Table 3.3.1-1, 15 28.i.f. Attachment A, 28.i.f, appears to address channel operational tests for the power- and intermediate-range channels, but not the reactor trip breakers. Explain the entry and justify the change.

3.3Q12- Attachment E, Page 5 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' has a listing New/ITS Table 3.3.2-1, 7 15.ii.d. The CTS markup of Table 3.5.2 includes "Add Function 7, 'ESFAS Pressurizer Pressure Interlock" 15.ii.d." Justification 15.ii.d addresses functional units 1.c and 1.d. Further, neither the NUREG-1431 markup nor the Ginna draft ITS include Function 7 in Table 3.3.2-1. Explain the entries regarding Function 7 and justify the change.

3.3Q13- Attachment E, Page 5 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' has a listing Table 3.5-1, AS 1/ITS LCO 3.3.1 15.1.d that is listed twice. Explain the significance of this double listing of an apparently singular item.

3.3Q14- The current Technical Specification for 3.5.1, Note 14, is marked LCO 3.3.1, Conditions C, S, and U. The improved Technical Specifications, LCO 3.3.1 has no Condition U. Explain the notation, and any associated changes.

3.3Q15- Attachment E, Page 6 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' has a listing Table 3.5-1, AS 14/ITS LCO 3.3.1.v, with no listing in the Notes column. Explain the significance of this listing, the change involved, and the justification for the change.

3.3Q16- Justification 15.i.f states the change is discussed and justified in Reference 30. This change allows Functional Units 2 (high and low settings), 5, 6, and 7 to have an inoperable channel bypassed for up to 72 hours during surveillance testing instead of the current 1 hour. Reference 30, *Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times*, May 1995, has not been reviewed and approved. Further, the Sections applicable to the present justification are not available to this reviewer. Provide stand-alone justification for this change.

3.3Q17- Justification 15.i.g states the change is discussed and justified in Reference 30. This change allows Functional Units 2 (high and low settings), 5, 6, and 7 to have an inoperable channel bypassed for up to 12 hours during surveillance testing instead of the current 2 hours. Reference 30, *Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times*, May 1995, has not been reviewed and approved. Further, the Sections applicable to the present justification are not available to this reviewer. Provide stand-alone justification for this change.

3.3Q18- ITS Table 3.3.1, Function 4, Source Range Neutron Flux, calls out Conditions I and J for Mode 2. Neither Required Action restores the inoperable channel similar to what Required Action K.1 does. Nor is a Mode reduction required to implement the Required Action (Mode 3). How is the Inoperable channel restored and what are the associated time limits?

3.3Q19- Justification 15.i.l states the change is discussed and justified in Reference 30. This change allows Functional Units 8, 9, 10 (low flow in one loop), 11, and 13 to have an inoperable channel bypassed for up to 72 hours during surveillance testing instead of the current 1 hour. Reference 30, *Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times*, May 1995, has not been reviewed and approved. Further, the Sections applicable

to the present justification are not available to this reviewer. Provide stand-alone justification for this change.

3.3Q20- Justification 15.i.m states the change is discussed and justified in Reference 30. This change allows Functional Units 8, 9, 10 (low flow in one loop), 11, and 13 to have an inoperable channel bypassed for up to 12 hours during surveillance testing instead of the current 2 hours. Reference 30, *Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times*, May 1995, has not been reviewed and approved. Further, the Sections applicable to the present justification are not available to this reviewer. Provide stand-alone justification for this change.

3.3Q21- CTS Table 3.5-1, Action Statement 5, is marked Conditions E, N, M, & P. Justifications 15.i.l and 15.i.m note Functional Units 8, 9, 9.a (low flow in one loop), 11, and 13. These become Functional Units 7.b, 8, 9.a (low flow in one loop), 13, and 12 in the ITS, with Conditions E, E, N, P, and E, respectively. ITS Table 3.3.1-1 applies Condition M to Functions 7.a (Pressurizer Pressure - Low), 9.b (Reactor Coolant Flow - Low, Two Loops), 10.b (RCP Breaker Position), and 11 (Undervoltage, Bus 11A and 11B). Provide justification showing the acceptability of Condition M for these functions.

3.3Q22- Justification 15.i.o states the change is discussed and justified in Reference 30. This change allows Functional Units 10 (low flow in both loops) and 14 to have an inoperable channel bypassed for up to 12 hours during surveillance testing instead of being tied to the next channel functional test of an operable channel. Reference 30, *Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times*, May 1995, has not been reviewed and approved. Further, the Sections applicable to the present justification are not available to this reviewer. Provide stand-alone justification for this change.

3.3Q23- Justification 15.i.n states the change is discussed and justified in Reference 30. This change allows Functional Units 10 (low flow in both loops), 14, and 15 to have an inoperable channel bypassed for up to 72 hours during surveillance testing instead of the current 1 hour. Reference 30, *Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times*, May 1995, has not been reviewed and approved. Further, the Sections applicable to the present justification are not available to this reviewer. Provide stand-alone justification for this change.

3.3Q24- Discuss and justify relocating the CTS Table 3.5.1/15 requirements for 4-kVac bus underfrequency trips.

3.3Q25- The CTS markup, Table 3.5-1, Action 7, mentions 15.i.u, Condition B & C. There is no Condition C in ITS LCO 3.3.4. Explain the notation in the CTS and the lack of Condition C in ITS LCO 3.3.4.

3.3Q26- The CTS markup, Table 3.5-1, Note 5, applies to ITS Functional Units Table 3.3.1-1, 15, 16, and 17. The markup at Note 5 refers to Note (j), Functional Unit 17 (ITS). ITS Table 3.3.1-1, Functional Unit 15 (reactor trip breakers) refers to Note (k). Functional Units 16 and 17 do not refer to a footnote similar to CTS Note 5. Footnote (j) does not appear to be related to Note 5. Explain, in a correlated statement, 1) the Note 5 applicability to ITS Functional Units Table 3.3.1-1, 15, 16, and 17, and 2) the annotated footnote (j) (CTS markup) and the Functional Unit 15 use of footnote (k) (ITS).

3.3Q27- Justification 15.ii.h states the change is discussed and justified in Reference 30. This change allows Table 3.3.2-1, Functional Unit 3.c, to have an inoperable channel placed in trip within 72 hours instead of the current 1 hour. Reference 30, *Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times*, May 1995, has not been reviewed and approved. Further, the Sections applicable to the present justification are not available to this reviewer. Provide stand-alone justification for this change.

3.3Q28- CTS Table 3.5.2, 3.d, *Safety Injection Start Motor Driven Pumps*, is transferred to ITS Table 3.3.2-1, 6.c, *Auxiliary Feedwater - Safety Injection*. Describe which Auxiliary Feedwater pumps are started on the Safety Injection actuation.

3.3Q29- Provide justification for the 48-hour restoration time instead of placing the inoperable channel in TRIP within one-hour for the auto-start of Auxiliary Feedwater on the trip of both main feedwater pumps (CTS Table 3.5-2, 3.e to ITS Table 3.3.2-1, 6.e). The ... "is justified in Reference 48" is inadequate justification to perform an evaluation of the acceptableness of the change.

3.3Q30- ITS Table 3.3.2-1, Functional Unit 4.e, appears to be incorrectly tabulated, that is, the 'e.' is not in the same horizontal position as the 'a.', 'b.', 'c.', and 'd.' above it. Likewise the entry *High-High Steam Flow* is lined up as a subset of *High Steam Flow*. Correct.

3.3Q31- The CTS markup for Table 3.5.2, 6.b, is annotated Functional Unit 5.b and Footnote d. ITS Table 3.3.2-1 has no footnote (d). Explain the significance of the annotation and the reported footnote (d).

3.3Q32- Attachment E, Page 7 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' has a listing CTS Table 3.5-2, AS *11*/ITS LCO 3.3.2/15.ii.h. Justification 15.ii.h addresses CTS Action Statement *12*, Functional Unit 3.c, not Action Statement *11* as listed. Explain the entry, resolve the discrepancy, and justify the change.

3.3Q33- Justification 15.ii.i and 15.ii.j state the changes are discussed and justified in Reference 30. This change allows Table 3.3.2-1,

Functional Unit 2.b, to place an inoperable channel in bypass for 12 hours while performing surveillance testing on a redundant channel and to have an inoperable channel placed in trip within 72 hours instead of the current 1 hour. Reference 30, *Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times*, May 1995, has not been reviewed and approved. Further, the Sections applicable to the present justification are not available to this reviewer. Provide stand-alone justification for this change.

3.3Q34- Justification 15.ii.h states the change is discussed and justified in Reference 30. This change allows Table 3.3.2-1, Functional Unit 3.c, to have an inoperable channel placed in trip within 72 hours instead of the current 1 hour. Reference 30, *Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times*, May 1995, has not been reviewed and approved. Further, the Sections applicable to the present justification are not available to this reviewer. Provide stand-alone justification for this change.

3.3Q35- Justification 15.ii.m states the change is discussed and justified in Reference 30. This change allows Table 3.3.2-1, Functional Units 3.b.ii, 5.a and 5.b, to have an inoperable channel placed in trip within 72 hours instead of the current 1 hour. Reference 30, *Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times*, May 1995, has not been reviewed and approved. Further, the Sections applicable to the present justification are not available to this reviewer. Provide stand-alone justification for this change.

3.3Q36- Attachment E, Page 7 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' has a listing CTS Table 3.5-2, AS *6*/ITS LCO 3.3.2/15.ii.o. Justification 15.ii.o addresses CTS Action Statement *2*, Functional Unit 3.f, not Action Statement *6* as listed. Explain the entry, resolve the discrepancy, and justify the change.

3.3Q37- Justification 15.ii.e and 15.ii.f state the changes are discussed and justified in Reference 30. This change allows Table 3.3.2-1, Functional Units 1.c, 1.e, 1.d, 6.b, 4.c and 5.b, to place an inoperable channel in bypass for 12 hours while performing surveillance testing on a redundant channel and to have an inoperable channel placed in trip within 72 hours instead of the current 1 hour. Reference 30, *Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times*, May 1995, has not been reviewed and approved. Further, the Sections applicable to the present justification are not available to this reviewer. Provide stand-alone justification for this change.

3.3Q38- The following values in ITS Table 3.3.2-1 come from CTS Table 3.5-4, with changes as noted

ITS Function	CTS Value	ITS Value	Justification
1.c, Allowable Value	≤ 5.0 psig	≤ 6.0 psig	15.ii.q
1.d, Setpoint	≥ 1723 psig	≥ 1750 psig	--
1.e, Allowable Value	≥ 500 psig	≥ 358 psig	15.ii.q
2.c, Allowable Value	≤ 40 psig	≤ 32.5 psig	15.ii.q
4.d, Setpoint	≤0.4E6 lbm/hr @ 755 psig, ≤545°F	dp corresponding to ≤0.49 x 10^6 lbs/hr at 755 psig, T_{avg} ≤545°F	--
4.d, Allowable Value	≤0.55E6 lbm/hr @ 755 psig, ≤545°F	dp corresponding to ≤0.55 x 10^6 lbs/hr at 755 psig, T_{avg} ≤545°F	--
4.e, Allowable Value	≤ 3.7E6 lbm/hr @ 755 psig	dp corresponding to ≤3.7 x 10^6 lbs/hr at 755 psig	--

Justification 15.ii.q states the revision reflects the accident analysis. Provide justification showing the setpoints and allowable values are in accordance with the Ginna Setpoint Analysis.

3.3Q39- The Allowable Values and Trip Setpoints for SR 3.3.4.2 were derived from CTS Figure 2.3-1, which was not included in the 3.3 or 3.8 tabs for review. The ITS Bases B 3.3.4, Reference 3, may clarify the transition. Verify that the Allowable Values and Trip Setpoints for SR 3.3.4.2 are correctly incorporated into the ITS from CTS Figure 2.3-1.

3.3Q40- Attachment E, Page 7 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' has a listing CTS Table 3.5-4, 8.a/ITS Table 3.3.2-1, 7. There is no Functional Unit 7 associated with ITS Table 3.3.2-1. Explain the entry, resolve the discrepancy, and justify the change.

3.3Q41- Justification 28.1.a states 'various calibration and testing interval requirements for RTS and ESFAS Functions were revised consistent with NUREG-1431.' Consistency with the NUREG does not make the change of interval acceptable, unless factors such as instrument stability, lack of instrument drift, and setpoint calculations document the acceptability of the extended interval. What are the bases for the acceptability of the calibration and testing interval extensions?

3.3Q42- The change in the channel operational test from monthly to quarterly for the following have not (apparently) been justified:

a. steam generator water level - high (CTS Table 4.1-1, Function 11/ITS Table 3.3.2-1, Functional Unit 5.b, SR 3.3.2.2)
b. steam generator water level - low-low (ITS Table 3.3.2-1, Functional Unit 6.b, SR 3.3.2.2)
c. steam generator water level (narrow range) (ITS Table 3.3.3-1, Functional Unit 20, no Surveillance Requirement)
d. reactor containment pressure (CTS Table 4.1-1, Functional Unit 17/ITS Table 3.3.2-1, Functional Units 1.c and 2.c, SR 3.3.2.2)
e. intermediate range neutron flux - high (CTS Table 4.1-1, Functional Unit 2/ITS Table 3.3.1-1, Functional Unit 3, SR 3.3.1.8)
f. steam generator pressure - low (CTS Table 4.1-1, Functional Unit 26/ITS Table 3.3.2-1, Functional Unit 1.e, SR 3.3.2.2)
g. steam flow - high (CTS Table 4.1-1, Functional Unit 32/ITS Table 3.3.2-1, Functional Unit 4.d, SR 3.3.2.2)
h. steam flow - high-high (CTS Table 4.1-1, Functional Unit 32/ITS Table 3.3.2-1, Functional Unit 4.e, SR 3.3.2.2)
i. T_{avg} - low (CTS Table 4.1-1, Functional Unit 33/ITS Table 3.3.2-1, Functional Unit 4.d, SR 3.3.2.2)
j. control room air intake radiation detectors (CTS Table 4.1-1, Functional Unit 36/ITS SR 3.3.5.1)
k. overtemperature ΔT (CTS Table 4.1-1, Functional Unit 4/ITS Table 3.3.1-1, Functional Unit 5, SR 3.3.1.7)
l. overpower ΔT (CTS Table 4.1-1, Functional Unit 4/ITS Table 3.3.1-1, Functional Unit 1, SR 3.3.1.7)
m. reactor coolant flow (CTS Table 4.1-1, Functional Unit 5/ITS Table 3.3.1-1, Functional Unit 9, SR 3.3.1.7)
n. pressurizer water level - high (CTS Table 4.1-1, Functional Unit 6/ITS Table 3.3.1-1, Functional Unit 8, SR 3.3.1.7)
o. pressurizer pressure - low/high (CTS Table 4.1-1, Functional Unit 7/ITS Table 3.3.1-1, Functional Unit 7, SR 3.3.1.7)
p. pressurizer pressure - low (CTS Table 4.1-1, Functional Unit 7/ITS Table 3.3.2-1, Functional Unit 1.d, SR 3.3.2.2)
q. 4-kVac undervoltage/underfrequency - Buses 11A and 11B (CTS Table 4.1-1, Functional Unit 8/ITS Table 3.3.1-1, Functional Unit 11, SR 3.3.1.9)
r. 4-kVac undervoltage/underfrequency - Buses 11A and 11B (CTS Table 4.1-1, Functional Unit 8/ITS Table 3.3.2-1, Functional Unit 6.e, SR 3.3.2.3)

Provide those justifications.

3.3Q43- Attachment E, Page 8 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' has a listing CTS Table 4.1-1, 21/ITS Table 3.3.1-1, 4. Describe how the valve temperature interlocks (CTS Table 4.1-1, Functional Unit 21) relate to the source range neutron flux instrument channels (ITS Table 3.3.1-1, Functional Unit 4). It appears to be a discrepancy. Explain the entry, resolve the discrepancy, and justify the change.

3.3Q44- Attachment E, Page 8 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' has the following listings:

CTS Table 4.1-1, 22/ITS Table 3.3.2-1, 1
CTS Table 4.1-1, 22/ITS Table 3.3.2-1, 2
CTS Table 4.1-1, 22/ITS Table 3.3.2-1, 3
CTS Table 4.1-1, 22/ITS Table 3.3.2-1, 4
CTS Table 4.1-1, 22/ITS Table 3.3.2-1, 5
CTS Table 4.1-1, 22/ITS Table 3.3.2-1, 6.

What is the relation between the pump-valve interlock (Functional Unit 22 of CTS Table 4.1-1) and the listed ESFAS actuation system instrumentation as noted? How is the refueling interval channel check of the pump-valve interlock implemented in the ITS? Explain the entries, resolve the discrepancies, and justify the changes.

3.3Q45- Attachment E, Page 8 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' lists CTS Table 4.1-1, 23/ITS Table 3.3.1-1, 14 (Turbine Trip Setpoint - Safety Injection input from ESFAS - Calibration and test interval). What is the relation between the turbine trip setpoint and the Block Trip? How are the calibration and test intervals implemented in the ITS? Explain the entries, resolve any discrepancies, and justify the changes. Justify relocation of the block trip note to UFSAR and Bases.

3.3Q46- CTS Table 4.1-1, Functional Unit 40, Manual Trip Breaker, is tested on a refueling basis. The 'R' is circled on the markup, with a '12' attached. ITS Table 3.3.1-1, Functional Unit 1, requires a Trip Actuation Device Operational Test every 24 months. Resolve the discrepancy between the noted 12 months and the 24 month interval. Justify the change from refueling to 24 months.

3.3Q47- Attachment E, Page 8 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' lists CTS Table 4.1-1, 8/ITS Table 3.3.1-1, 11/28.i.c (4-kV voltage and frequency). What is the disposition of the underfrequency relays and the justification for that action?

3.3Q48- Attachment E, Page 8 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' lists CTS Table 4.1-1, 8/ITS Table 3.3.1-1, 12/28.i.c (4-kV voltage and frequency in the CTS and Steam Generator (SG) Water Level Low-Low in the ITS). What is the relation of the two? What change is taking place here? Justify that change.

3.3Q49- The ITS revises the NUREG-1431 completion time to place an Inoperable channel in TRIP from 6 hours to 72 hours, and the time limit an Inoperable channel may be bypassed for Surveillance Testing from 4 hours to 12 hours. Justification C.23.i states this is justified in Reference 30. Reference 30, *Probabilistic Risk*

Analysis of the RPS and ESFAS Test Times and Completion Times, May 1995, has not been reviewed and approved. Further, the Sections applicable to the present justification are not available to this reviewer. Provide stand-alone justification for this change.

3.3Q50- Justification C.23.i states the frequencies of SR 3.3.1.3 and SR 3.3.1.6 (for the overtemperature ΔT) were "revised consistent with Ginna Station practices." Where are these frequencies located in the current Technical Specifications or other documentation? If included in the current Technical Specifications, is there a change in the frequency and, if so, what is the basis for the change in the frequency? Note, the NUREG markup does not include SR 3.3.1.3 for overtemperature ΔT while the ITS correctly does.

3.3Q51- The ITS revises the NUREG-1431 trip setpoints to plant specific values. Justification C.23.xxviii states "the Trip Setpoints values for *various* trip functions was replaced with a note stating these values are 'based on established limits'." Further, these trip setpoints are controlled within plant procedures and the setpoint methodology program. This applies to the source- and intermediate-range neutron flux instrumentation, the Buses 11A and 11B undervoltage instrumentation, and low autostop oil pressure turbine trip. For the record, where are these setpoints located and how are they controlled. Describe the acceptability of this system of setpoint control.

3.3Q52- Expand on justification C.24.xv. What in Reference 48 supports the extension of the channel operational test from monthly to quarterly? The statement is made that the ESFAS design does not allow testing of the Actuation Logic, the Master Relays, or the Slave Relays monthly. What testing assures their Operability and where are these requirements located? Justify not having those requirements in the ITS.

3.3Q53- The ITS revises the NUREG-1431 completion time to place an Inoperable channel in TRIP from 6 hours to 72 hours, and the time limit an Inoperable channel may be bypassed for Surveillance Testing from 4 hours to 12 hours. Justification C.24.i states this is justified in Reference 30. Reference 30, *Probabilistic Risk Analysis of the RPS and ESFAS Test Times and Completion Times*, May 1995, has not been reviewed and approved. Further, the Sections applicable to the present justification are not available to this reviewer. Provide stand-alone justification for this change.

3.3Q54- ITS Table 3.3.3-1 specifies '2' Steam Generator Water Level (Narrow-range) channels and '2 per SG' Steam Generator Water Level (Wide-range) channels. As all the listed instrumentation is either Type A variables or Category 1 instrumentation, shouldn't the number of required channels listing for the narrow-range channels also read '2 per SG'?

3.3Q55- Describe the loss of power/degraded voltage detection, logic, and actuation for diesel generator starting. A drawing would be helpful. The NUREG markup and the ITS state that there need to be two Operable channels per 480-Vac safeguards bus. Justification C.27.iv states the logic uses "one-out-of-two logic taken twice" and that "both channels must trip to operate a LOP DG start." Clarify these meanings.

3.3Q56- Justification C.29.iii states the Completion Time of 48 hours for Condition A for the CREATS is discussed in justification (D.)15.vii. While D.15.vii discusses the CREATS, it does not discuss the Completion Time of 48 hours for Condition A. Augment justification C.29.iii to stand alone and provide the justification for the 48 hour Completion Time.

3.3Q57- Attachment E, Page 5 of 'Current Ginna TS Cross Reference to Proposed TS - Table 2, Sorted Per Attachment B,' has a listing New/ITS Table 3.3.1-1, 14/15.i.x. Attachment A does not appear to have a justification 15.i.x. Explain the entry and justify the change.

3.3Q38A Current Technical Specifications Table 3.5-4, Functional Unit 2.b, *CONTAINMENT SPRAY*, *High-High Containment Pressure*, is moved to the improved Technical Specifications Table 3.3.2-1, Functional Unit 2.c, *Containment Spray*, *Containment Pressure - High*. The allowable value was ≤40 psig and is ≤ 32.5 psig in the improved Technical Specifications. The setpoint is the same in both versions of the Technical Specifications. The allowable value as revised is less conservative than the value in the accident analyses, calculation DA-EE-92-041-21, ≤ 30 psig. Justify using ≤ 32.5 psig as the allowable value in the improved Technical Specifications.

3.3Q6A The response to 3.3.Q6 states a review of the monthly calibrations for the H_2 monitor shows that, between 1990 and 1994, there were only four instances where the H_2 monitor indication at either the monitor panel, remote panel, or control room meter was found out of tolerance and requiring repair. This is a failure rate of approximately 3% (four failures out of approximately 150 calibrations). In only one instance, the response continues, were all three monitors out of tolerance, however, the second H_2 monitor remained Operable. Explain the later statement and describe the acceptability of the failure rate.

Additionally, the following tracking comments need verification of completion--#19, #21, #22, #25, #26, #28, and #29. All other tracking comments (mostly non-technical) for Section 3.3 are considered closed. Additionally, further justification, plant-specific to Ginna, needs to be provided to resolve comments #19 and #21 on relaxing these completion times to NUREG-1431 completion times rather than the current completion times. Stating the times conform to NUREG-1431 is insufficient justification.

Section 3.6 Improved TS

57. ITS 3.6.1

i. The Ginna Station containment design is a large dry structure typical for a single unit PWR. Therefore, all bases and headers associated with subatmospheric, ice condenser and dual containment structures were deleted. This is an ITS Category (iv) change.

ii. The Note in the Frequency column for SR 3.6.1.1 was moved to the Surveillance column as preferred by licensed personnel. In addition, "containment mini-purge valve" was added to the text of SR 3.6.1.1 as an exemption since the mini-purge valve leakage acceptance criteria is specified in new SR 3.6.3.4. These are ITS Category (iv) changes. Also, approved Traveller BWR-14, C.1 was only partially incorporated due to the proposed new Appendix J rule which was recently published for comment (Ref. 22). The changes provide consistency with the proposed new rule.

[ITS57ii]:
1. The "Note" change is rejected as not conforming to ITS format. This may be an ITS generic item in all chapters worthy of a generic solution.
Status:[ ] Rejected
Discussion:

2. How are these valves different from all other CIVs? Shouldn't we add the shutdown purge valves and all other CIVs that have different testing requirements? Are they tested during Integrated Leak Rate Type A testing? Are they Type A tested separately?
Status:[ ] Open
Discussion:

3. In SR 3.6.1.1, second paragraph is relocated to definition of L_a per traveler but is also replaced by new paragraph from NUREG-1431 Rev.1 as follows: The leakage rate acceptance criterion is $\leq 1.0\ L_a$. However, during the first unit startup following testing performed in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions, the leakage rate acceptance criteria are $< 0.6\ L_a$ for the Type B and Type C tests, and $< 0.75\ L_a$ for the Type A test.
Status:[ ] Open
Discussion:

4. Incorporating changes based upon an anticipated rule change just noticed in the Federal Register is outside conversion to the STS. What is in Reference 22?
Status:[ ] Rejected
Discussion:

iii. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added with respect to containment.

b. Various wording changes were made to improve the readability and understanding of the bases. This includes providing consistency with other basis sections as necessary.

[ITS57.iii.a and b]:
1. There are many BASES references to exemptions, AIF GDC criteria and staff evaluations provided which can not be confirmed. Also shouldn't the offsite dose limit be consistently defined as "well within" or "a fraction of" the limit rather than just "within" the limit?

2. Inserts 3.6.1.4 and 5 do not match the NUREG-1431 Rev #1. Explain this BASES change regarding minimum and maximum pathway leakage rates?

3. The use of isolation barriers has been requested many places in lieu of containment isolation valves. This is dealt specifically in LCO 3.6.3. The proposed text added here is rejected.

4. Changes to Applicability suggest there is no containment operability during MODE 6, Refueling is implied as not applicable.

5. See ITS57.iv below.

6. Per existing TS 4.4..1.1, P_a = 60 psig and not 59.8 psig. What is it?
Status:[ ] Open
Discussion:

iv. Incorporation of approved Traveller BWR-15, C.8.

[ITS57.iv]:
1. Provide copy of Traveler; this is not in BWR/6's TSIP conversion.

2. Also deleted (c) should be revised for the contents of existing TS 4.4.2.4.b.

3. Background Item a.2 - The LCO name change is accepted but the preceding text change is rejected as not appropriate here in this LCO.
Status:[ ] Open
Discussion:

58. ITS 3.6.2

i. The Ginna Station containment design is a large dry structure typical for a single unit PWR. Therefore, all bases and headers associated with subatmospheric, ice

condenser and dual containment structures were deleted. This is an ITS Category (iv) change.

ii. Note 2 for Conditions A and B was revised to provide additional clarification and consistency with the Condition statement. This is an ITS Category (iii) change.

[ITS58ii]:
These text additions are redundant. Required Action notes cannot be applied without already having this equipment inoperable as these text descriptions state has occurred. The place to add additional clarification is in the BASES.
Status :[ ] Rejected
Discussion:

iii. The Note in the Frequency column for SR 3.6.1.2 was moved to the Surveillance column as preferred by licensed personnel. This is an ITS Category (iv) change.

[ITS58iii]:
This "Note" change is rejected as not conforming to ITS format. This may be an ITS generic item in all chapters worthy of a generic solution.
Status:[ ] Rejected
Discussion:

iv. The Frequency for SR 3.6.2.2 was revised from 184 days following entry into containment to once every 24 months (i.e., once every refueling outage). The current Ginna Station TS do not contain a Surveillance for the air lock door interlock mechanism; however, RG&E believes that it is prudent to add a SR to ensure compliance with the specification. A Frequency of once every 24 months is considered appropriate since the interlock is purely mechanical and procedures are in place to control personnel access to containment during MODES 1 through 4. Also, this surveillance could challenge containment integrity if the interlock were to fail and both air lock doors were opened simultaneously. Finally, if the interlock is defeated during any shutdown condition, it must be retested prior to declaring it OPERABLE. Due to these changes, approved Traveller BWR-15, C.2 was only incorporated in part. This is a ITS Category (i) change.

[ITS58iv]: Also see [CTS#31.v-L1]
1. In the improved TS SR 3.6.2.1, Appendix J requires Type B tests of the air lock and the door seals every 184 days. There are no specific existing TS requirements for testing the air lock interlock mechanism; however, TS 4.4.2.4.c implies opening of the air lock door to do seal tests every six months. Also, the Frequency of 184 days for SR 3.6.2.2 was selected as consistent with Appendix J testing intervals for air locks and for CIVs with resilient seals.

2. The explanation that testing the interlocks jeopardizes containment integrity is not accepted; otherwise the Condition B, Note #2 Relaxation of stationing a dedicated individual to maintain one door closed must be withdrawn. Verifying the interlock mechanism only prior to containment entry is needed to limit this SR; so not deleting the note helps reduces the frequency of this test. Without this exception, the air lock doors would be required to be opened solely to perform this interlock test. This scenario would then also require the door seal test be performed within the next 48 hours creating unnecessary containment entries and requiring manpower for testing. In the event the plant is utilizing one air lock for entries and maintaining one air lock idle, this surveillance would impose an excessive testing requirement.

3. Also RG&E has 48 hours to test per the CTS and now has 72 hours per ITS. This is a relaxation which not been justified.

Status: Open
Discussion:

v. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added with respect to the containment air locks.

b. Various wording changes were made to improve the readability and understanding of the bases. This includes providing consistency with other basis sections as necessary.

[ITS58.V]:
1. The deletion of the last sentence of the background needs explanation from traveler.

2. P_a is 60 psig in existing TS, 59.8 psig in 3.6.1 and 59.3 psig here?

3. In LCO, recommend not adding text after OPERABLE or changing to "such that both doors are closed with leakage within acceptable limits."

4. Explain why air locks not applicable in MODE 6.

5. Second insert to first paragraph of A.1,A.2 and A.3 rejected because indication lights only check not accepted for a physical "close and lock" action.

6. The word clarification to Note #1 of Condition A and B does not clarify. Rejected.

7. The new text insert from traveler for 58.viii needs explanation.

8. Third paragraph of B.1, B.2, and B.3 allow for procedure only administrative control is rejected. This means the area is locked and personnel are not permitted to enter.

9. In C.1, C.2, and C.3, retain the "(eg., only one seal per door has failed)"

10 The references #3 can not be checked this should be referred to NRC PM to verify.

11. The deletion of the last sentence of SR 3.6.2.1 is not justified.

12. Issues raised in LCO review are also open but not identified here.
Status:[ ] Open
Discussion:

vi. Incorporation of approved Traveller BWR-16, C.20.

vii. Incorporation of approved Traveller WOG-23, C.4.

viii. Incorporation of approved Traveller BWR-16, C.24.

ix. Note 3 was revised to provide consistency with LCO 3.6.3, Note 4. This is an ITS Category (iii) change.

x. Required Actions C.2 and C.3 were revised to make air lock plural since more than one airlock may be affected when in Condition C. This change is also consistent with the bases for this Condition. This is an ITS Category (iii) change.

[ITS58.x]:
This condition is governed by separate condition entry. So each airlock is on a separate clock. With the change, it could be misinterpreted that if both air locks were not restored to operable status at the same time then a plant shutdown is required. If the plural word in the BASES is misleading at your plant, then you should propose a clarification in the BASES.
Status:[ ] Rejected
Discussion:

xi. The airlock acceptance criteria was also revised to be $\leq$ 0.05 L_a for each airlock and $\leq$ 0.01 L_a for each door. These changes are consistent with current Ginna Station testing practices since airlock acceptance criteria are not specified in TS. This is an ITS Category (i) change.

[ITS58.xi]: Also see [CTS 31.v-L1]
Clarify the basis for revising the above leakage rate criteria when there are no existing TS requirements. How is this determined to be acceptable? Additionally, the above does not discuss the other SR 3.6.2.2.a & .b text changes which are not justified. These changes are identical to what was already per the NUREG-1431.
Status:[ ] Open
Discussion:

59. ITS 3.6.3

i. The Ginna Station containment design is a large dry structure typical for a single-unit PWR. Therefore, all bases and headers associated with subatmospheric, ice condenser and dual containment structures were deleted. This is an ITS Category (iv) change.

ii. The title, LCO, Conditions, Surveillances, and bases were revised to replace "valves" with "barriers." This change is consistent with current Ginna Station TS 3.6.3 and the ITS bases which require valves, blind flanges, and closed systems to be OPERABLE. Since valves are only a subset of the devices which provide containment integrity, "barriers" is considered a more appropriate term (see Ref. 23). This is an ITS Category (iii) change.

[ITS59.ii]: Also see [CTS16.iii-L1]
This name change is not consistent with the existing TS 3.6.3 which was containment isolation boundaries. The existing TS also included air locks under this definition. Air Locks have a separate LCO 3.6.2. The use of barrier would include air locks and this is not appropriate. "Barrier" would also apply to the containment structure under LCO 3.6.1 and this is not appropriate. LCO 3.6.3 is meant to apply to only containment isolation valves and only those devices which block the penetration flowpaths. It is noted that the licensee is not proposing to call the mini-purge valves the "mini-purge barriers". Reference #23 has not been made available for review.
Status: [ ] Open

Discussion: This item was originally rejected but it was reopened following a telecon on 7-27-95. The name change from containment isolation "boundaries" to "barriers" is accepted for the title of LCO 3.6.3; however, internally within the LCO each name change must be discussed on the following guidelines:
1. Accept LCO title changed in all locations.
2. Accept LCO statement changed.
3. Actions note #3, only the word "valves" changed accepted to "barriers".
4. Actions Note #4, change accepted.
5. Proposed word changes in all Conditions not accepted; however, new Conditions can be written for those "barriers" which do not meet current GDC requirements and have supporting documentation for NRC acceptance. Example separate those barrier requirements now located in Condition A into their own separate Condition. Don't delete the Condition Notes but revise and make extensive use of notes to each Condition to describe the differences.
6. Changes to old SR 3.6.3.3 and 3.6.3.4 not accepted; however, new SRs may be written to accompany new Conditions to make appropriate for certain types of barriers.

iii. Note 3 was revised to provide clarity and consistency with the bases. This is an ITS Category (iii) change.

[ITS59.iii]:
1. The text clarification added to Note #3 are rejected because the LCO does not have to be redundant to the BASES text. The BASES are the location where clarifications such as these are placed. The justification for ITS changes to be consistent with the BASES is rejected. See item #3 of ITS59.ii.
Status:[ ] Rejected
Discussion:

2. The Note #1 needs more wording. It is recommended that the bracketed phrase be either [except for the Shutdown Purge System valve flow paths...] or [except for the 36-inch shutdown purge system valve flow paths...]
Status:[ ] Open
Discussion:

iv. Conditions A and B were revised to become more generic and Condition C was not added. The ITS bases state that isolation devices are either active or passive and that closed systems provide a passive barrier. The bases also state that closed systems are required to be intact for normally closed containment isolation valves to be considered OPERABLE. However, the Conditions are organized based on penetrations which have containment isolation valves and penetrations which have closed systems. To ensure consistency with the bases, Conditions A and B were changed to apply to all penetrations. A new Required Action A.2 was also added which allows a closed system to be used to isolate a failed isolation barrier. This change now allows any device which must be OPERABLE to meet the LCO to be used to isolate a failed containment isolation barrier. This change addresses the issues discussed in Reference 24. A new Required Action B.2, similar to A.1.2, was also added as a result of the above change. These are ITS Category (i) changes.

[ITS59.iv]:
1. The NUREG-1431 LCO Condition A and B were to cover all 10 CFR50, Appendix A, GDC 55 and GDC 56 type of penetrations. Condition C was to cover GDC 57 type of penetrations. It is acknowledged that Ginna was designed prior to the 10CFR 50, Appendix A, GDC; however, the Ginna design is not clearly presented in the LCOs. Does Ginna have lists of the containment penetrations to identify all those penetrations which meet the GDC and those which don't. Those penetration which meet GDC should go into Conditions A, B and C. Propose new Ginna Conditions for those which don't meet GDC requirements.
Status: Open
Discussion:

2. Condition A and B were developed to tie together. Insert 3.6.3.2 is not needed because when two valves are inoperable in Condition B and one is restored operable you are back into Condition A, Required Action A.2 which is the same as the proposed B.3 (except for the new Completion Time "devices outside of containment" text that is not acceptable). Proposed Required Action B.2 is rejected for the same reason that insert 3.6.3.10 to BASES is acceptable. Per the GDC, you cannot isolate a penetration open to containment with just one (unreliable) device (eg. check valve or a closed system) which is a leaking barrier needing periodic leak rate evaluation. Condition C was only written for one inoperable containment isolation valve on a "closed system inside of containment" do not write this into Condition A. Has the NRC staff accepted alternate positions for the Ginna design which are different from the GDC? If so, keep Condition C separate and rewrite these alternates in new Conditions for the Ginna design.
Status: Rejected
Discussion:

3. Proposed A.2 (insert 3.6.3.1) and its associated changes are rejected because closed system operability is determined by performance of Type A, B, and C tests and not by reliance on water leakage detection systems, operator walkdowns and other surveillance systems as described in the BASES. It is awkward to rewrite Condition A and B to do the same as a separate Condition C. If Condition C is used, it permits only the operability of the same affected closed system penetration to act as a second barrier once the sole inoperable isolation valve in the affected penetration is isolated.
Status: Rejected
Discussion:

4. Condition A and B disagree. Condition A exempts the mini-purge valve and Condition B exempts all purge valves? What condition is entered if the shutdown purge valve inoperable? How is it different from the mini-purge valve? Providing piping schematics with the containment boundary indicated would help this evaluation. The notes to Conditions A and B could be deleted if they were written as developed but the note to Condition C should stay where ever Condition C ends up being located. Add more Conditions, if needed.
Status: Open

v. Incorporation of approved Traveller BWR-15, C.15.

vi. Condition D, SR 3.6.3.11, and the associated bases were not added since Ginna Station does not have a shield building. This is an ITS Category (iv) change. As such, approved Traveller BWR-14, C.3 and C.4 were not incorporated.

vii. SR 3.6.3.1 and the associated bases were not added since the Shutdown Purge System is isolated by a blind flange (see Ref. 25). The LCO bases were revised to reflect that the blind flange must be installed for the containment isolation barrier for the Shutdown Purge System to be considered OPERABLE. Verification that this blind flange is in place is accomplished by new SR 3.6.3.2. This is an ITS Category (i) change. As such approved Traveller NRC-02, C.21 was not incorporated.

[ITS59.vii]:
The existing TS 4.4.2.4.b requirements to assure the shutdown purge valves are operable needs to be included in the improved TS. The 36-inch shutdown purge valves are used for ventilation of containment below MODE 4 and prior to personnel access. The valves must be operable at these times, during refueling and the flowpaths unrestricted by blind flanges. Where are the surveillance requirements (if not SR 3.6.3.1) and/or leakage rate tests for these valves (if not SR 3.6.3.7) to determine operability? Furthermore, what Conditions are entered until these valves are restored to service?
Status:[ ] Open
Discussion:

viii. SR 3.6.3.2 and the associated bases were not added since this surveillance is not in the current Ginna Station TS. The Background bases have been revised to state that "emphasis shall be placed on limiting purging and venting times to as low as reasonably achievable." All uses of the Mini-Purge System are under procedural control. In addition, the status of the mini-purge isolation valves is continuously available in the control room such that operators would be quickly aware of any valve that is not closed. Verification of these status lights is performed daily by operators such that a Surveillance every 31 days is unnecessary. This is an ITS Category (i) change. As such, approved Traveller BWR-15, C-19, Revision 1 was not incorporated.

[ITS59.viii]:
1. The SR 3.6.3.2 seems to be identical to existing TS 3.6.5, Containment Mini-Purge. This existing TS requirement is now a surveillance instead of an LCO. The SR and BASES should not be deleted as proposed. Also, please note that this SR is a visual verification and not just satisfied by checking the status of the indication lights.
2. Is the traveler applicable now?
Status:[ ] Rejected
Discussion:

ix. SR 3.6.3.3 and SR 3.6.3.4 have been revised to clarify that this verification is performed to ensure that nonautomatic isolation barriers which are required to be closed immediately following an accident are in fact closed, versus ensuring isolation barriers "closed during accident conditions are closed." Since several penetrations are normally open but are isolated during accident conditions if the first passive barrier fails, the existing SR wording is misleading. Also, the SR Frequency was revised from 31 days to 184 days consistent with Ginna Station practices. In addition, this SR was revised to not require verification of isolation barriers which are locked, sealed closed, or otherwise isolated similar to other Surveillances. The current Ginna Station TS do not contain this requirement. However, all containment isolation barriers have a special field tag identifying the device as an isolation barrier and specifies that Operations must be notified before changing the position of the device. This tag provides sufficient administrative controls such that a Frequency of 184 days is considered adequate. These are ITS Category (i) changes.

[ITS59.ix]:
1. This word clarification does not help, as noted in item #11 of ITS 59.ii.
2. Since the existing TS has no equivalent to SR 3.6.3.3 and 3.6.3.4, the Frequency of 31 or 92 days maintains a consistency with the periodic check required when in the various Conditions of this LCO depending whether the valves and blind flanges are inside or outside containment. These intervals were not changed from the previous STS and are consistent for all five Owner Group improved STS developed. It was determined during the development of the improved STS that this SR did not impose an unnecessary hardship. It was believed that the more consistent requirements were used, the less chance existed for missing an important SR. The tagging system is good but strictly independent of the Frequency for this SR.
Status:[ ] Open
Discussion:

x. SR 3.6.3.5 and the bases were revised to remove verification of "each power operated" containment isolation valve's isolation time. This SR is performed to ensure that those

containment isolation valves which receive a containment isolation signal to automatically close are tested in accordance with the IST program. At Ginna Station, several power operated containment isolation valves do not receive a containment isolation signal. Therefore, the isolation time of these valves is not relevant to this LCO. The change also provides consistency with new SR 3.6.3.5. This is an ITS Category (i) change.

xi. SR 3.6.3.6, SR 3.6.3.9, and the associated bases were not added since these tests are only required for plants with subatmospheric containments which does not apply to Ginna Station. This is an ITS Category (iv) change.

xii. SR 3.6.3.7 and the bases were revised to provide consistency with SR 3.6.2.1. The SR text was also changed since it only applies to the Mini-Purge System as the Shutdown Purge System is isolated above MODE 5 per the new LCO bases. The specified Frequency was revised since the requirement for more frequent testing of the mini-purge isolation valves was removed from the Ginna Station TS by Amendment No. 54 (Ref. 23). This is an ITS Category (i) change. Approved Traveller BWR-14, C.3 was also incorporated.

[ITS59.xii]:
1. The SR requirements for Shutdown Purge System valves at refueling should be located here or in ITS 3.9.4; but it is deleted. Explain?
2. What is in Amendment 54 that is applicable here? Existing TS 4.4.2.4.a is very general and does not apply here.
3. The Frequency Column should have an interval of 184 days and within 92 days after opening the valve.
Status:[ ] Open
Discussion:

xiii. Incorporation of approved Traveller NRC-03, C.9, Revision 1.

xiv. SR 3.6.3.10 and the associated bases were not added since the Shutdown Purge System is isolated in MODES 1, 2, 3, and 4 by a blind flange. The NUREG-1431 bases state that this SR only applies to plants which can have the shutdown purge valves open above MODE 5. Therefore, this SR is not applicable to Ginna Station. This is an ITS Category (iv) change. As such, approved Traveller WOG-11, C.1 was not incorporated.

xv. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including providing consistency with current Ginna Station TS bases.

b. Various wording changes were made to improve the readability and understanding of the bases. This includes providing consistency with other basis sections as necessary.

[ITS59.xv]:
There are 28 pages of bases with changes. Each page has changes amounting to over one hundred changes. If these Conditions are rewritten, as requested, then the BASES will have to be significantly changed. The BASES will have to be discussed later separately rather than now. Also, providing an itemized list of comments now will result in most not being applicable.
Status:[ ] On Hold
Discussion:

xvi. Incorporation of approved Traveller BWR-15, C.9.

xvii. Incorporation of approved Traveller BWR-16, C.22.

xviii. Incorporation of approved Traveller BWR-15, C.5.

xix. Incorporation of approved Traveller WOG-11, C.2.

xx. The LCO was revised to add a Note stating that the main steam isolation valves, main steam safety valves, and atmospheric relief valves are not included in this LCO when they are required to be OPERABLE in Chapter 3.7. The valves all credit the SG tubes as a boundary such that additional time is allowed to restore OPERABILITY. This change is consistent with the bases for ITS Chapter 3.7. This is an ITS Category (i) change.

[ITS59.xx]:
1. At Ginna, where is the containment integrity boundary with respect to these valves? Please provide a sketch.
2. Are these valves Type C tested?
3. Why doesn't Actions Note #3 apply in these cases?
4. Alternately, why can't these exemptions be explained in the BASES, so this note could be eliminated from the LCO statement?
Status:[ ] Open
Discussion:

xxi. Condition E was revised to provide consistency with LCO 3.6.2. The mini-purge valves at Ginna Station have similar leakage acceptance criteria to the containment air lock doors. As such, failure of one mini-purge valve does not require evaluation with respect to overall containment leakage. However, failure of both valves does require consideration of containment leakage since the penetration no longer meets its leakage criteria as specified in new SR

3.6.3.4. Therefore, Condition E was revised to apply to one mini-purge valve not within leakage limits and a new Condition was added for two valves not within leakage limits. In both of these Conditions, Required Action E.3 was not added since Ginna Station currently does not have this requirement. Also, due to the design of the mini-purge penetrations, it may not be possible to test a mini-purge valve if the second in-series valve is excessively leaking. These are ITS Category (iii) and (i) changes.

[ITS59.xxi]:
1. Why compare this to LCO 3.6.2?
2. Where is the existing TS acceptance criteria for air locks?
3. Do the mini-purge valves have resilient seals or not?
4. The noted inability to these valves to hold a test pressure gives concern for their capability to isolate as a deactivated automatic valve.
Status:[ ] Open
Discussion:

60. ITS 3.6.4

i. The Ginna Station containment design is a large dry structure typical for a single unit PWR. Therefore, all bases and headers (including LCO 3.6.4B) associated with subatmospheric, ice condenser, and dual containment structures were deleted. This is an ITS Category (iv) change.

ii. The Completion Time for Required Action A.1 was revised from 1 hour to 24 hours consistent with current Ginna Station TS 3.6.2. Allowing 24 hours to restore pressure to within limits is acceptable due to the large containment free volume and limited size of the containment Mini-Purge System. This is an ITS Category (i) change.

[ITS60.ii]: Also See [CTS16.ii-L1]
1. Explain how containment pressure is affected by the limiting size and function of Mini-Purge System.
2. How long does it take to open the isolation valves to return to atmospheric pressure?
3. Is this pathway filtered?
4. How long does it take to exchange containment air volume?
5. Why 24 hours and not a Completion Time of 1, 2, 4 or 8 hours? Remember the original basis for 1 hour is consistency with the loss of the new containment operability per ITS 3.6.1!
Status:[ ] Open
Discussion:

iii. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including providing consistency with current Ginna Station TS bases.

b. Various wording changes were made to improve the readability and understanding of the bases. This includes providing consistency with other basis sections as necessary.

[ITS 60.iii.a and b]:
1. There are several places where reference to inadvertent containment spray has been removed without explanation? Please explain.
2. There are changes for travelers in 60.iv and 60.v which are not available. Please explain.
3. Page B 3.6-45 is printed off to the side of the page please provide a new page.
4. In two places, the lower pressure limit is based on the requirements for the reactor coolant pump motors. Could you elaborate?
5. The changes for the 24 hour Completion Time are still under review in the LCO.
6. Is the exact reference to PI-944 in SR 3.6.4.1 necessary? Shouldn't this instead be a BASES reference document? Lastly, doesn't new paragraph insert belong in Bases for LCO in Section 3.3 and not here?
Status:[ ] Open
Discussion:

iv. Incorporation of approved Traveller WOG-11, C.3.

v. Incorporation of approved Traveller WOG-11, C.1.

61. ITS 3.6.5

i. The Ginna Station containment design is a large dry structure typical for a single unit PWR. Therefore, all bases and headers (including LCO 3.6.5B and LCO 3.6.5C) associated with subatmospheric, ice condenser and dual containment structures were deleted. This is an ITS Category (iv) change.

ii. The Completion Time for Required Action A.1 was revised from 8 hours to 24 hours. The current Ginna Station TS do not have a requirement for average containment air temperature. Since the Frequency for verifying that the average temperature is ≤ 120°F is 24 hours, RG&E believes that 24 hours to restore the temperature to within limits is appropriate. A Completion Time of 24 hours is also consistent with new LCO 3.6.4 (and current Ginna Station TS 3.6.2). This is an ITS Category (i) change.

[ITS61.ii]: See also [CTS16.iv-M1]
1. Explain the referred method for returning the air temperature to within limits?
2. Does any light, alarm etc. notify the operators that the limits are being exceeded?
3. What is the normal operating range of temperature? If restorative action were taken sooner before reaching the limits, why couldn't the Completion Time be 8 hours?
4. What if the SR 3.6.5.1 was performed every 12 hours?
Status:[ ] Open
Discussion:

iii. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including providing consistency with current Ginna Station TS bases.

b. Various wording changes were made to improve the readability and understanding of the bases. This includes providing consistency with other basis sections as necessary.

[ITS 61.iii.a and b]:
1. The insert into the first sentence of Applicable Safety Analyses is not understood.
2. The sentence at the end of the second paragraph of Applicable Safety Analyses is meant to be filled in with a description of the worst case single active failure for Ginna. Provide the worst case example.
3. The phrase "exceed the containment design temperature" has been removed in two places but the sentence structure is lost and has to be rewritten to complete the sentence. Also the ending sentence of this paragraph is now justified for the new wording. Please explain.
4. Please explain the deletion of the paragraph on inadvertent actuation of the CS System.
5. Please explain the reason for adding the last phrase to SR 3.6.5.1. Shouldn't this be in an LCO in Chapter 3.3? Why here?
Status:[ ] Open
Discussion:

62. ITS 3.6.6

i. The Ginna Station containment design is a large dry structure typical for a single unit PWR. Therefore, all bases and headers (including LCO 3.6.6B, LCO 3.6.6C, LCO 3.6.6D and LCO 3.6.6E) associated with subatmospheric, ice condenser and dual containment structures were deleted. Since the Containment Spray System at Ginna Station is

credited for iodine removal, LCO 3.6.6A was chosen. This is an ITS Category (iv) change.

ii. The LCO title, Conditions, Surveillances, and bases were revised to replace "Cooling System" with "Recirculation Fan Cooling System" consistent with Ginna Station nomenclature. Also, the Post-Accident Charcoal System was added to this LCO for reasons described below. This is an ITS Category (iv) change.

iii. Conditions C and E were revised, Condition D was deleted, and three new Conditions were added with respect to inoperable containment recirculation fan cooling (CRFC) units and post-accident charcoal filter trains. These changes were necessary due to plant-specific design features relative to the CRFC units that differ from the model plant used to produce NUREG-1431. At Ginna Station, there are four CRFC units which are all supplied by a single Service Water (SW) loop header (i.e., the SW system is only organized into trains at the pump level, not at the loop level). In addition, two of the four CRFC units (i.e., units A and C) connect to the Post Accident Charcoal System which does not have its own separate fan system. Consequently, if either CRFC unit A or C is inoperable, then the associated post accident charcoal filter train is inoperable such that Condition D cannot apply to Ginna Station (i.e., one would have to enter LCO 3.0.3). In addition, any one of the following combinations is successful for radioactive iodine removal post accident:

a. Two containment spray (CS) trains;

b. One CS train and one post-accident charcoal filter train; or

c. Two post-accident charcoal filter trains.

However, since at least one CS train must be OPERABLE above MODE 5 for containment pressure and temperature control, the last combination is not used. As such, organizing this LCO by trains for the Containment Recirculation Fan Cooling System and separating out the function of the Spray Additive and Post-Accident Charcoal Systems is not possible. Therefore, a new Condition (i.e., B) was added which allows one post-accident charcoal filter train to be inoperable for up to 7 days since at least one redundant post-accident charcoal filter and one CS train is available. A second new Condition (i.e., C) was added for the case with two post-accident charcoal filters inoperable which requires that they be restored to OPERABLE status within 72 hours consistent with Condition A for loss of one CS train. A third Condition (i.e., D) was added with respect to an

inoperable spray additive tank since this renders the CS iodine removal capability inoperable. A Completion Time of 72 hours is provided for this Condition also. In addition, existing Condition C was revised to address the case of one or two inoperable CRFC units and Condition E was revised to reflect all the possible combinations which result in the need to enter LCO 3.0.3. A Note was added to the LCO to require declaring the associated post-accident charcoal filter train inoperable when CRFC unit A or C is inoperable. Also, the necessary Surveillances and bases associated with the Post-Accident Charcoal System and the spray additive tank were added. These are ITS Category (i) changes.

[ITS62.iii]:
1. The LCO statement has the word containment which is redundant to CRFC and should be deleted.
2. The new note under applicability is a Condition statement and Required Action. It is acknowledged but not fully understood. Please provide a sketch of the components and their connections. This will enable new Condition F to be rewritten with this note in it (and Required Actions added), another Condition may be created or some other solution implemented.
3. It is acceptable to delete Condition D.
4. Condition C needs a qualifier statement...that both CS trains are OPERABLE. This is because you could be in Condition A and C at the same time and not be able to meet the design accident.
5. Isn't new Condition D a subset of Condition A? Please comment especially regarding how it affects both CS trains not being fully OPERABLE (no iodine removal capability). This assumes there is only one spray additive tank. Also this needs to say that both post-accident charcoal filters must be OPERABLE per CTS 3.3.2.2.e. The CTS refers to the spray additive system and you only spec the tank?
6. New Condition E statement does not include Condition D if the Completion Time is not met.
7. In new Condition H couldn't the last three OR statements be shortened to "Any combination of three or more inoperable CRFC units, spray additive tank, CS train or post-accident charcoal filter trains.
8. Couldn't we get rid of the Required Actions and Completion Time of Condition H and move the Condition H statements to below the Condition G statement and thus go directly to the Condition G Required Actions?.
9. SR 3.6.6.1 needs to also verify the spray additive valves.
10. New SR 3.6.6.13 should include the phrase "that is not locked, sealed, or otherwise secured in position" as justified in ITS #62.v.
11. New SRs 3.6.6.5 and 3.6.6.6 may need to be renumbered per the Writers Guide. What is the real frequency of these SRs?
Status:[ ] Open
Discussion:

iv. Condition F was relocated above Condition G consistent with the ITS Writer's Guide. This is an ITS Category (iii) change.

[ITS62.iv]:
This appears to be purely administrative but why is it categorized as technical?
Status:[ ] Open
Discussion:

v. Incorporation of approved Traveller NRC-03, C.9, Revision 1.

vi. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including providing consistency with current Ginna Station TS bases.

b. Various wording changes were made to improve the readability and understanding of the bases. This includes providing consistency with other basis sections

[ITS62.vi.a and b]:
1. There is an insert at the end of the second paragraph of Background for CS System which is not understood for "additional heat removal"?
2. It appears that the last paragraph of insert 3.6.6.3 should be relocated to the end of the paragraph into which it is inserted?
3. What are the other Ginna containment ventilation and air conditioning systems noted on Page B 3.6-65?
4. In the Applicable Safety Analyses, there are three deleted paragraphs which should be specifically explained.
5. Insert 3.6.6.11 is missing.
6. Questions to the LCO parts of 3.6.6 have asked for sketches to show the relationship and dependencies of these three systems. The improved TS LCO basis at this point does not appear to agree with the existing TS as is explained and interpreted by CTS 13.v.
7. The questions to the LCO part of 3.6.6 need to be addressed, discussed and resolved before any continuing detailed review of the BASES LCO, ACTIONS and SRs section can occur.
Status:[ ] Open
Discussion:

vii. Incorporation of approved Traveller WOG-23, C.6.

viii. The Completion Time limit of "10 days from the discovery of failure to meet the LCO" was not added to the new specification since Ginna Station currently does not have this requirement. The intent of adding this limit to the Completion Time is to prevent a plant from continuously being in the LCO without ever meeting the full system requirements. This abuse of the LCO is best handled under

plant procedures since the addition of this limit to the Completion Time column creates confusion among licensed personnel. Providing this limit can still result in LCO abuse since the systems can all be declared OPERABLE for only a few minutes and then the LCO immediately entered again. Sufficient NRC guidance already exists with respect to extensive use of LCO time (e.g., Ref. 26). In addition, the Maintenance Rule (10 CFR 50.65) requires monitoring of equipment performance. Finally, a review of Ginna Station plant records indicates that the systems covered by this LCO were out of service a total of 1017 hours from June 1990 to July 1994 (or < 4% of the time in which the plant was above Cold Shutdown) which demonstrates that this limit is unnecessary.

[ITS62.viii]:
It is acceptable to not add this but the justification raises a few questions. First, by deleting this we do not want to push the "use" of this situation further underground into plant procedures. The NUREG-1431 attempted to deal head-on with this "abuse." formerly called the "flip-flop" between Conditions. Have all places in the improved TS where this is used, been deleted? Has Completion Times 1.3 be changed. These are generic questions outside of this specific deletion in this section. Also, the 1017 hours out of service seems high for these systems alone.
Status:[ ] Open
Discussion:

ix. SR 3.6.6.A.3 was not added to the new specifications. This SR requires verification of a minimum SW flow rate through the fan coolers. This process variable is not used or credited in the DBA or transient analyses. The current Ginna Station TS do not contain this surveillance. In addition, no other component supplied cooling water by SW (e.g., DGs, CCW) has any flow rate verification surveillance. This is an ITS Category (i) change.

[ITS62.ix]:
The correct SW flow rate is important to keep the CRFC units OPERABLE since two units are always running during normal operations to maintain the containment air temperature within the new LCO 3.6.5 limits. These limits were not previously in the existing TS. This verification is important because the SW flow is apparently organized at the pump level and not the loop level to these units. Please add this SR.
Status:[ ] Rejected
Discussion:

63. ITS 3.6.7

i. This section and associated bases were not added since they were relocated to LCO 3.6.6 as discussed above. This is an ITS Category (i) change.

64. ITS 3.6.8

i. The Ginna Station containment design is a large dry structure typical for a single unit PWR. Therefore, all bases and headers associated with subatmospheric, ice condenser and dual containment structures were deleted. In addition, the LCO was renumbered since LCO 3.6.7 was relocated to LCO 3.6.6. This is an ITS Category (iv) change.

ii. Incorporation of approved Traveller BWR-06, C.5.

iii. Incorporation of approved Traveller WOG-11, C.5.

iv. Incorporation of approved Traveller WOG-11, C.1.

v. SR 3.6.8.1, SR 3.6.8.2, and SR 3.6.8.3 were not added since the current Ginna Station TS do not contain a requirement for the hydrogen recombiners or these surveillances. As described in the new bases for this section, the hydrogen recombiners installed at Ginna Station are inside containment and are designed around the use of a combustion chamber to control hydrogen generation. Performing a functional test would most likely require an evacuation of containment for safety reasons with little benefit. Instead, RG&E proposes to perform a CHANNEL CALIBRATION of each hydrogen recombiner actuation and control channel every 24 months to ensure that each hydrogen recombiner will provide the correct hydrogen and oxygen mixture in the combustion chamber. In addition, the blower fan for each hydrogen recombiner will be operated for ≥ 5 minutes every 24 months. This is an ITS Category (i) change.

[ITS64.v]:
1. Operating the fan is a good start but there should also be a minimum amount of testing that is possible to verify that 1) supply hydrogen and oxygen gets to the unit to permit combustion; 2) the power supply is independently redundant; 3) the unit can flash or spark without hydrogen/oxygen present; 4) that moisture or other by-products do not foul operation of the unit; and etc. The insert 3.6.7.5 implies only the fan is needed to oxidize the hydrogen within containment. This does not appear to be correct. Revised this new SR 3.6.7.1
2. What is wrong or difficult with performing a physical and visual inspection of the recombiner as is required in SR 3.6.8.2?
3. Since these are the only hydrogen control units at the plant why isn't there a verification of operation every 184 days? Such as operating the blower fan or performing a channel check or calibration.
Status:[ ]
Discussion:

vi. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including discussion concerning the design of the hydrogen recombiners.

b. Ginna Station has an alternate hydrogen purge system as described in UFSAR Section 6.2.5.2.2 and accepted by the NRC in Reference 27.

[ITS64.vi.a and b]:
1. There is some confusion on system names. Does this mean Ginna has a hydrogen purge system or does this mean Ginna has an alternate hydrogen control system. The text at the bottom of page B 3.6-115 has deleted reference to the hydrogen purge system. In order to have a Condition B to this LCO, an alternate hydrogen control system must be acceptable to the NRC staff. Page B 3.6-117 implies this is the Mini-Purge System. Is this correct.
2. The background to the BASES in the second paragraph is revised to imply hydrogen will be discharged to the environment during normal operation by use of the mini-purge system and during accident conditions as the alternate to the recombiners. See BASES insert 3.6.7.3 which proposes evacuations of the general public? Based on this information there is no reason to have a Condition B for Ginna.
3. The BASES insert 3.6.7.4 is not understood. It is stated that recombiners must be placed into operation before the 4.1 v/o limit is reached. Why imply that the limit could be exceeded sooner and not reduced the Completion Times to match this analyzed state? Also implying operation of the recombiners at or near the 6 v/o limit does not seem prudent. There is an implied dependence on venting excess hydrogen which suggests the recombiners do not have 100% redundant capability.
Status:[ ] Open
Discussion:

65. ITS 3.6.9

i. This section and associated bases were not added. The Hydrogen Mixing System as defined in the bases is used to ensure that containment atmosphere is uniformly mixed. Ginna Station does not have a Hydrogen Mixing System and instead uses the Containment Recirculation Fan Cooling System for this function (LCO 3.6.6). Therefore, this requirement is not relevant to the Ginna Station design. This is an ITS Category (i) change.

[ITS65.i]:
1. Why is the CRFC system not used as an alternate hydrogen control system?
2. Has the NRC staff provided an evaluation/acceptance of the hydrogen control methods and alternatives at Ginna?
3. Wouldn't the use of air circulation within containment preclude the formation of hydrogen pockets with potential concentrations above the 6 v/o limit?
Status:[ ] Open
Discussion:

66. ITS 3.6.10

i. This section and associated bases were not added. The Hydrogen Ignition System as defined in the bases is used to control hydrogen levels within containment post accident. Ginna Station does not have a Hydrogen Ignition System and instead uses the Hydrogen Recombiner System for this function (LCO 3.6.7). Therefore, this requirement is not relevant to the Ginna Station design. This is an ITS Category (i) change.

[ITS66.i]:
It is acceptable not to add this LCO due to the TSIP conversion guidelines prohibiting plant modifications to implement the NUREG-1431.

67. ITS 3.6.11

i. This section and associated bases were not added since they were relocated to LCO 3.6.6 as discussed above. This is an ITS Category (i) change.

68. ITS 3.6.12

i. This section and associated bases were not added. The function of the containment vacuum relief valves as defined in the bases is to ensure that containment is protected against negative pressure. Ginna Station does not have containment vacuum relief valves. Protection against negative pressure is provided by LCO 3.6.4, "Containment Pressure." Therefore, this requirement is not relevant to the Ginna Station design. This is an ITS Category (i) change.

ITS68.i:
Please explain how Ginna does not need to have a Containment Vacuum Relief System. The existence of a pressure limitation does not preclude the need to analyze for a potential situation such as an inadvertent actuation of the containment spray system. Has this analysis been performed? Is there sufficient margin between the negative pressure created and the structural limit of the containment liner.
Status:[ ] Open
Discussion:

69. ITS 3.6.13

    i. This section and associated bases were not added. The Shield Building Air Cleanup System (SBACS) as defined in the bases is used to ensure that radioactive materials which leak from containment following a DBA is adequately filtered and absorbed. Ginna Station does not have a SBACS since the leakage through the containment liner is controlled by LCO 3.6.1, "Containment." Therefore, this requirement is not relevant to the Ginna Station design. This is an ITS Category (i) change.

70. ITS 3.6.14

    i. This section and associated bases were not added. The Air Return System as defined in the bases is only used at Ice Condenser designs which does not apply to Ginna Station. Therefore, this requirement is not relevant to the Ginna Station design. This is an ITS Category (i) change.

71. ITS 3.6.15

    i. This section and associated bases were not added. An ice bed as defined in the bases is only used at Ice Condenser designs which does not apply to Ginna Station. Therefore, this requirement is not relevant to the Ginna Station design. This is an ITS Category (i) change.

72. ITS 3.6.16

    i. This section and associated bases were not added. Ice condenser doors as defined in the bases are only used at Ice Condenser designs which does not apply to Ginna Station. Therefore, this requirement is not relevant to the Ginna Station design. This is an ITS Category (i) change.

73. ITS 3.6.17

    i. This section and associated bases were not added. A divider barrier as defined in the bases is only used at Ice

Condenser designs which does not apply to Ginna Station. Therefore, this requirement is not relevant to the Ginna Station design. This is an ITS Category (i) change.

74. ITS 3.6.18

i. This section and associated bases were not added. Containment recirculation drains as defined in the bases are only used at Ice Condenser designs which does not apply to Ginna Station. Therefore, this requirement is not relevant to the Ginna Station design. This is an ITS Category (i) change.

75. ITS 3.6.19

i. This section and associated bases were not added. A Shield Building as defined in the bases is used to ensure that radioactive materials which leak from containment following a DBA are adequately filtered and absorbed. Ginna Station does not have a Shield Building since the leakage through the containment liner is controlled by LCO 3.6.1, "Containment." Therefore, this requirement is not relevant to the Ginna Station design. This is an ITS Category (i) change.

<u>Section 3.6 Current TS</u>

13. Technical Specification 3.3

i. TS 3.3.1.1.b and 3.3.1.3 - LCO 3.5.1 Condition A was added which allo.....

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xv. TS 3.3.2.2 - This was revised to allow both post-accident charcoal filter trains (including the CRFC units which supply them) to be inoperable for up to 72 hours if both containment spray (CS) trains are OPERABLE. This change provides consistency with the accident analyses which demonstrate that either two CS trains, one CS train and one post-accident charcoal filter train, or two post-accident charcoal filter trains are adequate to remove radioactive iodine from the containment atmosphere following a DBA (i.e., each CS train and post-accident charcoal filter train provides 50% of the required iodine removal requirements). However, two CS trains cannot be inoperable since at least one train must operate for containment pressure and temperature control. In addition, two CRFC units can now be removed from service for up to 7 days since the accident analyses only credit two of the four cooling units as being OPERABLE with respect to containment pressure and temperature control. Finally, with one or two CRFC units

inoperable and not restored within 7 days, the plant has only 36 hours to reach MODE 5 versus 84 hours due to the importance of maintaining containment pressure and temperature control. These are Ginna TS Category (v.b.12) changes.

[CTS13.xv-L1]:
1. The existing TS 3.3.2.2.f is missing from the CTS. Is this a typo or an error?
2. Is this a new DBA analysis which has been performed since these CTS were issued as Amendment 24?
3. The unidentified page following TS 3.3.2.2.e contains three combinations of systems to meet the DBA. Where is Ginna's commitment made to hence forth not rely on "(2) two CRFC units and two post-accident charcoal filters" to satisfy the DBA accident analysis.
4. Please show the configuration and number of filters in the sketch requested in ITS62.iii,item #2.
Status:[ ] Open
Discussion:

16. Technical Specification 3.6

i. TS 3.6.1 - The text allowing closed containment isolation valves to be opened on an intermittent basis under administrative controls was relocated to a LCO Note consistent with NUREG-1431. This is a Ginna TS Category (v.c) change.

ii. TS 3.6.2 - The Applicability for maintaining containment pressure within limits was revised from reactor criticality to MODE 4. This change is necessary to provide consistency with the requirements for containment integrity (i.e., LCO 3.6.1) since exceeding these pressure limits could result in a overpressure of containment if an accident were to occur. This is a Ginna TS Category (iv.a) change.

[CTS 16.ii-M1]:
This is acceptable.

[CTS16.ii-L1]:
1. Explain how containment pressure is affected by the limiting size and function of Mini-Purge System.
2. How long does it take to open the isolation valves to return to atmospheric pressure?
3. Is this pathway filtered?
4. How long does it take to exchange containment air volume?
5. Why 24 hours and not a Completion Time of 1, 2, 4 or 8 hours? Remember the original basis for 1 hour is consistency with the loss of the new containment operability per ITS 3.6.1!
Status:[ ] Open
Discussion:

iii. TS 3.6.3 - The title for this LCO was revised from containment isolation "boundary" to "barrier" which provides greater consistency with the bases for NUREG-1431. In addition, three new requirements were added. The first requires that a penetration with both containment barriers inoperable be isolated within 1 hour versus 4 hours. This change provides consistency with TS 3.6.1 since containment integrity is potentially violated. As such, verification of continued acceptable containment leakage must be initiated immediately if both barriers are declared inoperable. In addition, new requirements with respect to an inoperable airlock (including the use of an airlock with an inoperable door or interlock mechanism) and containment mini-purge penetrations with isolation valves that exceed their leakage rate acceptance criteria were added. The new requirement for the air locks specifies that an inoperable airlock door (including an inoperable interlock mechanism) must be isolated within 1 hour and locked closed within 24 hours. However, a dedicated individual can be used in the case of an inoperable interlock mechanism to allow entry and exit through the airlock. The new specification provides specific Required Actions in the event that current Ginna Station TS 4.4.2.4.c is exceeded. The new requirement for the mini-purge penetrations specifies that the affected penetration must be isolated within 24 hours if an isolation valve exceeds its leakage limit. These new requirements provide added assurance that penetrations which can provide direct access to the outside environment are addressed quickly when their isolation barriers become inoperable. This is a Ginna TS Category (iv.a) change.

[CTS16.iii-L1]: Also see [ITS59.ii]
Status:[ ] Rejected, 7-14-95
[ ] Open, 7-29-95
Discussion: This item was originally rejected but it was reopened following a telecon on 7-27-95. The name change from containment isolation "boundaries" to "barriers" is accepted for the title of LCO 3.6.3; however, internally within the LCO each name change must be discussed.

[CTS16.iii-M1]:
The change to restore containment integrity within one hour rather than 4 hours per existing TS 3.6.3 is acceptable.
1. What does 4th sentence of #16.iii mean?
2. What does 8th sentence of #16.iii mean? There are no limits stated; so how is this TS exceeded?
3. See ITS 3.6.3 #59.iv for other comments on improved TS.
Status:[ ] Open
Discussion:

[CTS16.iii-L2]:
The relaxations for LCO 3.6.2 Conditions A and C have not been justified.
Status:[ ] Open
Discussion:

[CTS16.iii-L3]:
The relaxation for new LCO 3.6.2, Condition B has been accepted.

[CTS16.iii-L4]:
The relaxation for Actions Note #1 has not been justified.
Status:[ ] Open
Discussion:

[CTS16.iii-L5]:
1. Is there a need for any routine access to containment? What is it?
2. The relaxation for Condition A, Required Actions, Note #2 has not been justified.
Status:[ ] Open
Discussion:

[CTS16.iii-L6]:
The relaxation for LCO 3.6.3, Condition A has not been justified.

[CTS16.iii-L7]:
1. The improved TS LCO 3.6.3 Condition E (new Condition C) is a relaxation which needs justification for both shutdown purge and mini-purge valves.
2. The original intent of this Condition was for large purge valves which are inherently more difficult to restore operable. Why should the mini-purge valves be given this large Completion Time and not held to 4 hours?
Status:[ ] Open
Discussion:

iv. TS 3.6.3 - The use of a closed system to isolate an inoperable containment isolation barrier was added to this specification. Consequently, a closed system which must be OPERABLE to meet this specification can be used to isolate a failed isolation barrier. Also, isolation devices located outside containment that were used to isolate a failed containment isolation valve are required to be verified closed once every 31 days. For isolation devices inside containment, they must be verified closed upon entry into MODE 4 from MODE 5 if it has not been performed within the last 92 days. These are Ginna TS Category (v.b.22) changes.

[CTS16.iv-L1]:
The use of a closed system to isolate an inoperable containment isolation barrier is not accepted as proposed. The merging of this new isolation method into Condition A is confusing and requires new information. Please refer to ITS 59.iv for more questions.

[CTS16.iv-M1]:
It is acceptable to reverify the isolation of a penetration at different intervals depending whether the isolation device is located inside or outside of containment.

v. TS 3.6.5 - This was relocated to the bases for ITS 3.6.3 since it does not meet any of the four criteria and does not specify any Required Actions. Operation of the Mini-Purge System is performed under procedures such that its use is strictly controlled. Placing this information in the bases also provides similar control under 10 CFR 50.59 (i.e., the Bases Control Program). This is a Ginna TS Category (iii) change.

[CTS16.v-RI1]:
TS 3.6.5 seems to be the same as SR 3.6.3.2 so this should be a Category (i) change. The text needs to be in the BASES but should be in the BASES for describing the purpose of SR 3.6.3.2.
Status:[ ] Open
Discussion:

vi. TS 3.6 - A new requirement was added which specifies that the average containment air temperature shall be ≤ 120°F above MODE 5. This temperature limit is necessary to ensure that the resulting containment temperature following a DBA is within the assumptions used for environmental qualification of components within containment. If the average containment air temperature is > 120°F, it must be restored within 24 hours. This is a Ginna TS Category (iv.a) change.

[CTS16.vi-M1]:
The addition of the new LCO is acceptable; however, the 24 hours to restore OPERABLE needs review as is noted in ITS61.ii.

vii. TS 3.6 - A new requirement was added which requires the hydrogen recombiners to be OPERABLE in MODES 1 and 2. The hydrogen recombiners are assumed in the accident analyses to be used to prevent a hydrogen explosion within containment that could overpressurize the containment structure. The new LCO allows 30 days to restore an inoperable recombiner and 7 days to restore two inoperable recombiners if the Mini-Purge System is OPERABLE. In addition, the plant can enter MODES 1 and 2 with an inoperable hydrogen recombiner. This is a Ginna TS Category (iv.a) change.

[CTS16.vii-M1]:
1. It is acceptable to add the new LCO 3.6.7 for the Hydrogen Recombiner.
2. The Applicability of this LCO is MODE 1 and 2 but CTS 16.viii state applicable DBAs are assumed to occur also in MODE 3. Please explain why LCO is also not applicable in MODE 3.
3. The existing TS had no mention of recombiners, but the NUREG-1431 guidance assumes there is at least one if not two alternate methods of hydrogen control. There appears to be none at Ginna except the release of hydrogen directly to the atmosphere under normal and accident conditions. Based on this, only Condition A is acceptable and Condition B can not be allowed.
Status:[ ] Open
Discussion:

x. TS 3.6.1.b and TS 3.6.1.c - The requirement describing the specific applicability for containment integrity was not added. No screening criteria apply for this requirement since containment integrity is not assumed in the refueling safety analysis. The fuel handling accident inside containment analysis (UFSAR 15.7.3.3) takes no credit for isolation of the containment, containment integrity, nor effluent filtration prior to release. The requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the TRM. Boron concentration changes in MODE 6 and Required Actions to suspend positive reactivity additions is provided in new LCO 3.9.1. This is a Ginna TS Category (iii) change.

[CTS 16.x-RI1?]:
This is proposed to be relocated to refueling but the questions on why there is no Containment Integrity for MODE 6 still remain.
Status:[ ] Open
Discussion:

28. Technical Specification 4.1

i. The following changes were made to TS 4.1.1 or Table 4.1-1:

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k. Table 4.1-1, Functional Unit #25 - The calibration and testing requirements for the containment pressure narrow range transmitter were not added to the new specifications. This instrument is not used or credited in any DBA or transient analysis. This instrument is only used to verify that containment

pressure remains ≤ 1.0 psig and ≥ -2.0 psig during normal operation. These items were relocated to the TRM. This is a Ginna TS Category (iii) change.

[CTS28.i.k-R01]:
Further explain this justification for relocation. Is this the instrument which is used to verify SR 3.6.4.1? If it is, then this parameter is the assumed initial ambient pressure for determining the peak containment pressure in the DBA analysis. Likewise, peak negative pressure for inadvertent containment spray would also be based on this instrument.
Status:[ ] Open
Discussion:

ii. The following changes were made to TS 4.1.2 or Table 4.1-2:

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e. Table 4.1-2, Functional Unit #13 was revised per SR 3.6.6.8 to require verification of the spray additive tank NaOH concentration once every 184 days instead of monthly. This change is acceptable since the spray additive tank is normally maintained isolated at power such that changes to the NaOH concentration or level are not expected. This is a Ginna TS Category (v.b.30) change.

[CTS28.ii.e-L1]:
Please describe what makeup water volume pathways to the spray additive tank exist and how is it only through which valves that are locked, isolated or under administrative control. This is to support the basis that the tank is isolated at power.
Status:[ ] Open
Discussion:

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i. The following new requirements were added to Table 4.1-2 (Ginna TS Category (iv.a) changes):

10. SR 3.6.5.1 - requires verification every 24 hours that containment average air temperature is ≤ 120°F.

[CTS28.ii.i.10-M1]:
This is acceptable.

11. SR 3.6.6.7 - requires verification every 184 days that the spray additive tank volume is ≥ 4500 gallons.

[CTS28.ii.i.11-M1]:
Please describe what makeup water volume pathways from the spray additive tank exist and how it could only be through which valves that are locked, isolated or under administrative control that water could be inadvertently released. This is to support the basis for the 184 days interval during which the tank will not be inadvertently drained.
Status:[ ] Open
Discussion:

31. Technical Specification 4.4

i. TS 4.4.4 - The requirements for the tendon stress surveillances were not added. The level of detail is relocated to the Pre-stressed Concrete Containment Tendon Surveillance Program described in new Specification 5.5.6 and a more generic program description is provided. This is a Ginna TS Category (iii) change.

[CTS31.i-R01]:
Ginna has made changes to the applicable Section 5.5.6 which need resolution prior to approval of this SE.
Status:[ ] Open
Discussion:

ii. TS 4.4.3 - The requirements for the testing of the portion of the RHR system in the recirculation configuration were not added. The level of detail is relocated to the Primary Coolant Sources Outside Containment Program described in new Specification 5.5.2 and a more generic program description is provided. This is a Ginna TS Category (iii) change.

[CTS31.ii-R01]:
Ginna has made changes to the applicable Section 5.5.2 which need resolution prior to approval of this SE.
Status:[ ] Open
Discussion:

iii. TS 4.4.1 (except definition for L_a), 4.4.2.1, 4.4.2.2, and 4.4.2.4 - These were not added to the new specifications since this information is contained in 10 CFR 50, Appendix J and does not need to be retained within technical specifications. SRs 3.6.1.1 and 3.6.1.2 provide for the

necessary relation from technical specifications to Appendix J. These are Ginna TS Category (ii) changes.

[CTS31.iii-R01]:
The contents of existing TS 4.4.2.4.b needs to be added to the Background BASES in item c which is proposed to be deleted. See ITS57.iv.
Status:[ ] Open
Discussion:

iv. TS 4.4.2.3.a and 4.4.2.3.b - These were revised to require that if the allowed 10 CFR 50, Appendix J leakage limits are exceeded, they must be restored within 1 hour versus 48 hours consistent with LCO 3.6.1. However, the leakage limit of < 0.6 L_a was revised to be consistent with the new Appendix J rule and implementation guidance (i.e., the leakage limit is < 0.6 L_a on a maximum pathway leakage rate basis prior to entering MODE 4 for the first time following each refueling outage and < 0.6 L_a on a minimum pathway leakage rate basis for all other time periods). This is a Ginna TS Category (v.a) change.

[CTS31.iv-L1]:
1. The existing TS requirement is for penetrations and leakage paths under Type B and Type C testing. The "48 hours" to restore has been relaxed to "indefinite" by LCOs 3.6.2 and 3.6.3.
2. Where does this "minimum/maximum pathway leakage rate" come from? This sounds like another relaxation?

Status:[ ] Open
Discussion:

v. TS 4.4.2.4.c - A specified air lock leakage acceptance criteria of $\leq 0.05L_a$ when tested at $\geq P_a$ was added to the new specifications. This acceptance criteria is required to be retained within technical specifications by 10 CFR 50, Appendix J, Section III.D.2(iv) and is consistent with NUREG-1431 and current testing requirements. In addition, a new Surveillance was added to verify that only one door in each airlock can be opened at a time once every 24 months. This test is necessary to ensure that the OPERABILITY of the air locks, as defined in the new bases for LCO 3.6.2 is maintained. These are Ginna Category (iv.a) changes.

[CTS31.v-L1]:
1. Existing TS 4.4.2.4.a says penetrations, like air locks, are tested per Appendix J. Appendix J says the air locks have to have a leakage rated in the improved TS. Existing TS are deficient. This also contradicts ITS 58.xi justification which says it was revised. This seems not a more restrictive but is equivalent unless there is a previous requirement. Needs better justification.
2. See ITS58.iv - As noted above this SR is important to ensuring operability of the air locks so it should have the same Frequency of 184 days as leakage testing unless the air lock door is not opened. Justify testing interval at 184 days rather than 24 months.
3. Appendix J is less restrictive now than existing TS 4.4.2.4.c in that once an air lock door is opened then you have 72 hours rather than 48 hours to retest the door seal. Provide this less restrictive justification.

Status:[ ] Open

Discussion:

vi. TS 4.4.2.3.c - The requirement to perform an engineering evaluation if the mini-purge supply and exhaust lines isolation valve leakage exceeds 0.05 L_a was revised to require isolation of the affected penetration within 24 hours. In addition, the affected penetration must be verified isolated once every 31 days if it is outside containment, or once every 92 days if it is inside containment. These changes provide direct guidance to operators which are consistent with NUREG-1431. This is a Ginna TS Category (v.c) change. This is acceptable. There is no need to include this in the SE since this temporary requirement is now made a permanent requirement.

vii. TS 4.4.5.1 - Two new surveillances (SR 3.6.3.1 and SR 3.6.3.2) were added which require verification of the correct position of containment isolation barriers located outside containment once every 184 days and inside containment prior to entering MODE 4 from MODE 5 if it has not been performed within the previous 184 days. These surveillances ensure that the containment isolation barriers remain OPERABLE above MODE 5. These are Ginna TS Category (iv.a) changes.

[CTS31.vii-L1]:

1. It is unclear how this is a more restrictive change. A tagging system is not 100% reliable nor is valve lock-out. This is the reason for this SR.
2. This SR contains a relaxation for those isolation devices located in high radiation areas. Justify this relaxation.
3. There should be maintenance/surveillance activities on-going in the plant continuously. It is for these reasons that the frequency of the SRs were kept at the intervals currently used in all active Westinghouse plants and all the other owner groups. During the development of the NUREG-1431, a lengthening of these 31 day intervals could not be justified, except for those located within containment to be at 92 days. The 184 days proposed is unacceptable. The periodic walkdowns are essential to verify equipment status and this is just another check which should be made in a consistent manner as them verifications required under the Required Actions of LCO 3.6.2 and LCO 3.6.3. As noted above in justification for CTS31.vi, this provides direct guidance to operators in conformance with the NUREG-1431 and all other plants.

Status:[ ] Open

Discussion:

viii. TS 4.4.6.2 - The Surveillance Frequency for automatic containment isolation valves has been revised from 18 to 24 months (see Section D, item 1.xii). The response times for CIVs is discussed in the bases for new LCO 3.6.3. This is a Ginna TS Category (v.b.1) change.

[CTS31.viii-L1]:

This relaxation from 18 to 24 months is being review by the Project Manager. This change is on hold until a decision is announced.

ix. TS 4.4 - Two new Surveillances were added with respect to the hydrogen recombiners (SR 3.6.7.1 and SR 3.6.7.2). The first new Surveillance requires that the blower fan for the hydrogen recombiners be operated for ≥ 5 minutes once every 24 months. The second new Surveillance requires that a CHANNEL CALIBRATION be performed on the hydrogen recombiner actuation and control channels once every 24 months. The performance of these SRs ensures that the hydrogen recombiners are OPERABLE and capable of performing their post-accident function. These are Ginna TS Category (iv.a) changes.

[CTS31.ix-M1]:
Please note that the comments state in ITS64.v equally apply here. Until there is agreement on the number and what are the contents of the new SRs it is difficult to justify them.
Status:[ ] Open
Discussion:

32. Technical Specification 4.5

ii. TS 4.5.2.1 - This was revised to relocate all SI, RHR, and CS pump testing frequencies and discharge pressure requirements to the Inservice Testing program described in new Specification 5.5.8 consistent with the ITS. These are Ginna TS Category (iii) changes, respectively.

[CTS32.ii-L1orR01]: .
This is acceptable but isn't this a relaxation from once per month to the less frequent IST interval?

v. TS 4.5.2.3 - The requirements denoting the Frequency and conditions of the air filtration system tests were not added to the new specifications. This level of detail is relocated to the Ventilation Filter Testing Program described in new Specification 5.5.10. In addition, the remaining requirements were all relocated to the Administrative Controls section. These are Ginna TS Category (iii) and (i) changes, respectively.

[CTS32.v-R01]:
This is acceptable.

vii. TS 4.5.1.2 - A new Surveillance (SR 3.6.6.1) was added to verify the correct position of each manual, power operated, and automatic valve in the CS flowpath that is not locked, sealed, or otherwise secured in position. This Surveillance ensures that the CS System is OPERABLE in accordance with the LCO. This is a Ginna TS Category (iv.a) change.

[CTS32.vii-M1]:
The addition of SR 3.6.6.1 is acceptable.

viii. TS 4.5.1.2.b - The Frequency of performing the spray nozzle gas test was revised from once every 5 years to once every 10 years consistent with SR 3.6.6.14. The increased surveillance interval is considered acceptable due to the

passive nature of the spray nozzles and previous acceptable results. This is a Ginna TS Category (v.b.36) change.

[CTS32.viii-L1]:
The new SR 3.6.6.15 is acceptable.

ix. TS 4.5.2.3.5 - This was revised to only require actuation of the post-accident charcoal filter dampers from an actual or simulated SI signal once every 24 months to ensure that the system aligns itself correctly (SR 3.6.6.12). The post-accident charcoal filter dampers must still be opened at least once per 31 days to allow the system to operate for ≥ 15 minutes. Consequently, only the frequency of the automatic alignment of the dampers is being revised to provide consistency with other specifications. This is a Ginna TS Category (v.b.37) change.

[CTS32.ix-L1]:
This appears acceptable but explain if there is any difference between the CTS referring to isolation valves versus in the ITS reference to the dampers. Specifically in the Ginna terminology, are these dampers same as the isolation valves?
Status:[ ] Open
Discussion:

x. TS 4.5.2.2.a - This was revised to adjust the testing Frequency of the spray additive valves from monthly to once every 24 months consistent with SR 3.6.6.13. This increased testing interval is acceptable since the system only needs to be verified that it can actuate on an actual or simulated SI signal on a refueling basis similar to the SI and RHR systems. Any additional valve testing is addressed by the IST program. In addition, a new Surveillance (SR 3.6.6.9) was added to verify that the CS motor operated isolation valves actuate to their correct position once every 24 months following an actual or simulated SI signal. Finally, a new Surveillance (SR 3.6.6.14) was added to verify that the spray additive flow rate is within limits once every 5 years. These changes ensure that the CS and spray additive tank LCOs continue to be met. These are Ginna TS Category (v.b.38) changes.

[CTS32.x-L1]:
New SR 3.6.6.13 is acceptable.

[CTS32.x-M1]:
Adding a new SR 3.6.6.9 is acceptable.

[CTS32.x-M2]:
Adding a new SR 3.6.6.14 is acceptable.

xi. TS 4.5.2.3.3 and 4.5.2.3.4 - These were revised to require that each CRFC unit be operated for ≥ 15 minutes once every 31 days (SR 3.6.6.2). This test will ensure that the CRFC units are OPERABLE in accordance with the LCO. In addition, a new Surveillance is also required once every 24 months to ensure that the CRFC units start on an actual or simulated SI signal. These tests will ensure that the CRFC units are OPERABLE in accordance with the LCO. These are Ginna TS Category (v.a) changes.

[CTS32.xi-M1]:
Adding a new SR 3.6.6.2 is acceptable.

[CTS32.xi-M2]:
Adding a new SR 3.6.6.11 is acceptable.

Section 3.7 Improved TS
76. ITS 3.7.1

i. Table 3.7.1-1 was not added to the new specifications. The current Ginna Station accident analyses assume that all eight main steam safety valves (MSSVs) are available for pressure relief. No analyses have been performed at lower power levels to support the inoperability of one or more safety valves. Consequently, Table 3.7.1-1 and the second part of Condition B do not apply to Ginna Station. Required Action A.1 was also deleted and replaced with a requirement to restore an inoperable MSSV(s) to OPERABLE status within 4 hours consistent with current Ginna Station TS 3.4.1. The bases were revised to state that the 4 hour Completion Time is to address instances where the MSSVs are administratively declared inoperable since hardware related repairs cannot be performed during MODES 1, 2, or 3, similar to approved Traveller WOG-15, C.1 (Rev.1). These are ITS Category (i) changes.

[ITS76.i]:
The proposed changes to this LCO are accepted; however, the above basis for explaining the changes to the BASES is not accepted and requires discussion. First, Traveler WOG-15, C.1 (rev. 1) does not exist but has been superseded by BWOG-09. Secondly, for Section 3.7 in NUREG-1431, neither of these travelers are specifically applicable here. This Ginna basis is presented as insert 3.7.1.2 in the proposed ITS BASES for SR 3.7.1.1. The above text should be deleted from here and this issue resolved under ITS76.iv.
Status:[ ] Open
Discussion:

ii. Table 3.7.1-2 was not added to the new specification since this table only provides the lift settings of the MSSVs. These values were relocated to SR 3.7.1.1 to consolidate the definition of MSSV OPERABILITY. That is, SR 3.7.1.1 now requires that the MSSVs have an "as left" lift setting within ± 1% of the specified setpoint and an "as found" lift setting within ± 3% of the specified setpoint. This is an ITS Category (i) change.

[ITS76.ii]:
This change is acceptable; however, the tolerances above do not match the description provided in the accompanying BASES. The "as found" lift setting is +1% and -3% instead of ± 3%. This is acceptable but there should be text agreement. Also, why not add the "as found" and "as left" terminology to the BASES to help clarify for the Ginna plant personnel?
Status:[ ] Open
Discussion:

iii. The NOTE for SR 3.7.1.1 was revised to provide clarification that this Surveillance is only required to be performed prior to entry into MODE 2 from MODE 3 consistent with the NUREG-1431 bases. This is an ITS Category (iii) change.

[ITS76.iii]:
This is acceptable; however, this change merely restates what the BASES already state is the basis for this note. Why make Ginna different from the standard?
Status:[ ] Open
Discussion:

iv. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including providing consistency with current Ginna Station TS bases.

b. Various wording changes were made to improve the readability and understanding of the bases. This includes providing consistency with other basis sections as necessary.

[ITS76.iv.a and b]:
1. In Background, the deletion of the second sentence in the second paragraph refers to the relief capacity of the MSSVs and not the design basis which has been reinserted. This is just a repeat of the first sentence in Applicable Safety Analyses. Suggest putting in what were the requirements of the applicable design code used at Ginna.
2. In Applicable Safety Analyses, second paragraph - insertion of RCS does not seem important and change of AOO to DBA does not appear correct?
3. In LCO, deletion in the first paragraph, explain why the second and third sentences should not be restored except for "five" should be changed to "all" or "eight". Please explain in this case how the phrase "open on demand" is defined at Ginna. Is this an external signal to the valve to open, a passive pressure buildup that does not activate the valve lift, or something else? How is the Ginna MSSVs different from the Westinghouse standard design? Does Ginna have a power operated relief valve on each steam header with the MSSVs?
4. In Applicability, insert 3.7.1.1 - explain why the phrase "to ensure that the RCS remains within its pressure safety limit" should not be deleted or if absolutely necessary, relocated at the end of the inserted text. The RCS has other more direct pressure controlling design features than just the MSSVs.
5. In Actions, insert 3.7.1.2 is not accepted because it is implied that MSSVs never have inoperable hardware. They instead have non-significant discrepancies? or just have bad paperwork? The questions of item #3 above lead directly into the review of the contents of this insert. Also the four hour Completion Time to include the NRC review is not practical for mere administrative problems. More explanation is required?
Status:[ ] Open
Discussion:

v. Incorporation of approved Traveller NRC-01, C.2.

77. ITS 3.7.2

i. The Applicability and bases were revised to require the MSIVs to be OPERABLE in MODES 1, 2, and 3 regardless of the position of the valve. The bases were also revised to state that an MSIV which is closed and de-activated is considered OPERABLE since the valve is in its assumed position for the accident analysis. As such, Conditions A and B are no longer applicable and were deleted. This change eliminates potential confusion and clarifies what is defined as an OPERABLE MSIV. This is an ITS Category (iii) change.

[ITS77.i]:
1. The change to applicable in MODES 1, 2, and 3 is acceptable.
2. The change stated in the second sentence is not acceptable here nor in ITS LCO 3.6.3. This negates the definition in Section 1.0. This is merely the taking of alternate action to maintain the assumptions of the accident analyses when a disabled system cannot function on its own.
3. It is acceptable to delete Condition B; however, Condition A stays. Condition A is rewritten to state "One MSIV and/or one non-return check valve inoperable on the same steam header in MODE 1". The Required Action is "Restore the valve(s) to OPERABLE status" with a Completion Time of 8 hours. Proposed new B is rejected because multiple condition entry would allow proposed Condition A and B to be entered simultaneously to result in Condition D. Therefore, Condition D is not needed; since by omitting it, this is an LCO 3.0.3 situation. Please note the resolutions proposed to rewritten Condition C in ITS77.ii.
Status:[ ] Open
Discussion:

ii. The Completion Time for Required Action C.1 was changed from 8 hours to 24 hours. The current Ginna Station TS do not contain any Required Actions with respect to an inoperable MSIV. A Completion Time of 24 hours was selected to allow restoration of an inoperable MSIV due to the ability to isolate a SG by other means (e.g., turbine stop valves). This is an ITS Category (i) change.

[ITS77.ii]:
1. Condition C statement is counter proposed as Condition B to be "One or more MSIVs and/or non-return check valves inoperable in MODES 2 or 3" with the Required Actions and Completion Times remaining the same to be consistent with Condition A.
2. At Ginna, how is a SG isolated by the turbine stop valves without isolating both SGs?
Status:[ ] Open
Discussion:

iii. The Note for Condition C was not added to the new specifications since Ginna Station only has two installed MSIVs. Consequently, if both MSIVs are inoperable, the plant is outside the accident analysis in the event of a SLB. This is also true if both non-return check valves are inoperable, or one or more isolation valves from each SG are inoperable. The description for Condition C was also revised to limit its application to only one inoperable MSIV. A new Condition was added in the event that one or more isolation valves from each SG are declared inoperable requiring entry into LCO 3.0.3. These are ITS Category (iv) and (iii) changes respectively.

[ITS77.iii]:
1. This note can now be added as originally in NUREG-1431.
2. Since this rewrite of Condition C applies in only MODES 2 or 3, two MSIVs can be inoperable and closed to maintain the accident analysis assumptions.
3. One inoperable MSIV is now under Condition A.
4. As noted in ITS77.ii, new Condition D is not necessary. Old Condition D becomes C just as proposed in this submittal.
Status:[ ] Open
Discussion:

iv. The Completion Time for Required Action C.2 was revised from once every 7 days to once every 31 days. The current Ginna Station TS do not contain this requirement. A Frequency of once every 31 days is consistent with the Required Actions for LCO 3.6.3 which is appropriate since the MSIVs also perform a containment isolation barrier function as described in the bases. This is an ITS Category (i) change.

[ITS77.iv]:
This is rejected because the length of time to reverify is insignificant to the real effort which should be to restore the MSIVs or non-return check valves OPERABLE and to return to MODE 1.
Status:[ ] Rejected
Discussion:

v. SR 3.7.2.1 was revised to require that each MSIV be tested under no flow and no load conditions consistent with current Ginna Station TS 4.7. This is a conservative test since the valve is assisted in closing when steam flow is available. As such, the valve closure time under hot conditions would be dependent upon available steam flow. In addition, a new Surveillance (SR 3.7.2.2) was added which requires verification once every 24 months that each MSIV can close on an actuation signal, independent of closure time, consistent with the accident analysis assumptions and current testing practices. These are ITS Category (i) changes.

[ITS77.v]:
1. SR 3.7.2.1 is acceptable.
2. SR 3.7.2.2 is not new to Ginna.
3. The questions to ITS77.viii need answers to separate the non-return check valves from the MSIV function.
4. Since the non-return check valves are not in the existing TS, could testing under no flow and no load for MSIV be mainly for verifying the non-return check valve? What are the test conditions for new SR 3.7.2.3? Is this conservative or non-conservative?
Status:[ ] Open
Discussion:

vi. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including providing consistency with current Ginna Station TS bases and the accident analyses. As such, approved Traveller WOG-24, C.3 was not added.

b. Various wording changes were made to improve the readability and understanding of the bases.

c. Discussion was added related the function of the MSIVs with respect to containment isolation.

[ITS77.vi.a, b and c]:
1. What is in WOG-24, C.3 that is not added?
2. As noted in ITS77.viii, the function of the non-return check valve is not adequately described to incorporate into the LCO as yet. As changes are pending, until this is resolved. In ZYINDEX, a non-return check valve does not exist in the UFSAR?
3. Please verify the MSIV bypass valve is not a check and it is manually opened/closed only. Is it a containment isolation valve? Does the MSIV bypass valve loop include the MSIV and the non-return check valve?
4. "The MSIVs may also be actuated manually." is added twice.
5. Should insert 3.7.2.2 be justified as 77.vi.a?
6. Shouldn't insert 3.7.2.3 read ", high steam flow and 2 out of 4 low T_{avg} coincident with safety injection (SI), or high-high steam flow coincident with SI." per existing TS Table 3.5-2, Functional Unit 5.a and b?
7. Insert 3.7.2.4 has a different accident assumptions than the standard MSIV BASES in second paragraph. In the SLB for containment integrity analysis, offsite power is not assumed to be available but it is available for Ginna. In the third paragraph of the SLB inside of the turbine building, both MSIVs are assumed to isolate but what about a single failure of one? Please explain these differences and how it could affect the LCO?
8. In LCO, as noted in ITS77.i, inoperable MSIVs that are closed and de-activated are not consider OPERABLE.
9. Comments to BASES in Actions and Surveillance Requirements are dependent on resolutions reached in the LCO.
Status:[ ] Open
Discussion:

vii. Incorporation of approved Traveller NRC-01, C.2.

[ITS77.vii]:
This 77.vii was not marked in ITS. Does it apply to Reference #5 of BASES?
Status:[ ] Open
Discussion:

viii. The LCO was revised to add requirements and surveillances for non-return check valves which are in-series with each MSIV. These non-return check valves are credited in the accident analysis are therefore added to the new specifications. The title and bases were also appropriately revised. These are ITS Category (ii) changes.

[ITS77.viii]:
1. From the BASES changes, it appears that without the non-return check valves, the MSIVs could not function as more recent MSIVs designs which can isolate to prevent back flow of steam in the main steam header from emptying into containment or isolating the unaffected SG. It appears the non-return check valve is part of the MSIV function and should they be treated as one?
2. How are these valves currently treated at Ginna?
3. Are the MSIVs and non-return check valves separately tested or together?
4. Is the non-return check valve designed to the same requirements as the MSIV? Is it designated as a containment isolation valve for this penetration?
Status:[ ] Open
Discussion:

ix. Various editorial changes were made which provide clarity but do not alter the intent of the LCO. These are ITS Category (iv) changes.

[ITS77.ix]:
1. This was only noted once for Required Action C.1 which was rejected in ITS77.ii.
2. Please provide a list where the other various changes were made so they can be evaluated.
Status:[ ] Open
Discussion

78. ITS 3.7.3

i. The title was revised to be consistent with Ginna Station nomenclature which includes the use of "main feedwater pump discharge valve (MFPDV)." This is an ITS Category (iv) change.

[ITS78.i]:
In MFPDV, the removal of the word "isolation" from this valve name is important to the purpose for this LCO. There appears to be no unique use of the proposed new valve name after reviewing UFSAR 10.4.5, Feedwater System. MFIV from the NUREG-1431 would clearly apply to the motor-operated isolation valve immediately downstream of the main feedwater pump. The check valve between the pump and the isolation valve would be the "main feedwater pump discharge valve". There are no pump numbers identified. Also, there appears to be no associated bypass valve with the isolation valve. There appears to be only one bypass valve associated with each MFRV. This needs correcting in the LCO title, LCO and BASES text.
Status:[ ] Rejected
Discussion:

ii. Condition D was not added since the current Ginna Station TS do not contain these requirements. The fact that two parallel valves are inoperable should not require a shorter isolation time since containment isolation penetrations do not have similar requirements. This is an ITS Category (i) change.

[ITS78.ii]:
Condition D is written to override multiple condition entry into Condition A, B and C at the same time that results in a main feedwater flowpath being unable to isolate, if needed to meet the accident analyses assumptions. If this is deleted then extensive rewrite is required. The shorter time is justified because should the containment be breached, there is no way to automatically isolate this flowpath.
Status:[ ] Rejected
Discussion:

iii. The Completion Time for Required Actions A.2, B.2, and C.2 was revised from once every 7 days to once every 31 days. The current Ginna Station TS do not contain this requirement. A Frequency of once every 31 days is considered acceptable due to the available indications of valve position available to plant operators. This is an ITS Category (i) change.

[ITS78.iii]:
1. Though not mentioned above, the 24-hour Completion Time for Required Action A.1, B.1, and A.3 is accepted.
2. Though not mentioned above, the text changes to Required Actions A.1, A.2, C.1, and C.2 are rejected because "close" is not same as isolated.
3. The change in Completion Time from 7 days to 31 days is not accepted because this is the main feedwater system which is meant to be OPERABLE and open rather than isolated and relying on the safety backup auxiliary feedwater system for normal operation. Also the 31 day frequency is a visual verification as is done for LCO 3.6.3.
Status:[ ] Open
Discussion:

iv. A new Condition was added in the event that both MFW flowpaths to the SGs have at least one inoperable valve. The new Condition requires entry into LCO 3.0.3 since the plant is outside the accident analyses. As a result of this addition, Condition E was revised to specify that it would only be entered in the event that the Required Actions of Condition A, B, or C were not satisfied consistent with the ITS Writer's Guide. This is an ITS Category (iii) change.

[ITS78.iv]:
New proposed Condition E is not understood as justified above. The first sentence says a new condition was added and then the third sentence says it was subsequently revised? The above justification implies that Ginna must have at least one operable flowpath with water flowing to the steam generator. The BASES to this condition read that there must not exist a flowpath which is unisolable to one or both SGs. The deleted Condition D was written for this later implied purpose for new Condition E. ????
Status:[ ] Open
Discussion:

v. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including providing consistency with the accident analyses.

b. Various wording changes were made to improve the readability and understanding of the bases. This includes the deletion of text that is not related to the technical specification function performed by the MFRVs and bypass control valves.

[ITS78.v.a and b]:
1. As noted in ITS78.i above, the name changes are not sufficiently justified. The term "associated" apparently only applies to the MFRV but the BASES title and text imply it also includes the MFIV. This needs modification throughout background.
2. In LCO, the deletion of the last sentence of the first paragraph should be explained. Isn't the main feedwater line safety related from the SG to the MFRV? Where is the boundary?
3. In LCO, the text addition at the end of the second paragraph is rejected based upon ITS78.vi below.
4. In LCO, explain deletion in third paragraph.
5. Comments to the BASES Actions are deferred until the contents of the LCO Condition statements are resolved.
Status:[ ] Open
Discussion:

vi. The Applicability and bases were revised to require the MFRVs and bypass valves to be OPERABLE in MODES 1, 2, and 3 regardless of the position of the valves. The bases were revised to state that a valve which is closed and de-activated, or isolated by a closed manual valve, is considered OPERABLE since the valve is in its assumed position for the accident analysis. This change eliminates potential confusion and clarifies what is defined as an OPERABLE MFRV and bypass valve. This is an ITS Category (iii) change.

[ITS78.vi]:
1. It is acceptable to require these OPERABLE in MODES 1, 2, and 3.
2. The change stated in the second sentence is not acceptable here, nor in ITS LCO 3.6.3 or ITS 77.i above. This negates the definition in Section 1.0. This is merely the allowance to take the alternate action to maintain the assumptions of the accident analyses when a disabled system cannot function on its own. The BASES must be returned to the original text.
Status:[ ] Open
Discussion:

vii. SR 3.7.3.1 was separated into two surveillances since the MFPDVs have a different isolation time (as assumed in the accident analysis) than the other isolation valves. This is an ITS Category (iv) change.

79. ITS 3.7.4

i. The title was revised to be consistent with Ginna Station nomenclature which includes the use of "atmospheric relief valve (ARV)" versus "atmospheric dump valve (ADV)." This is an ITS Category (iv) change.

ii. The LCO, Conditions, Required Actions, Surveillances and bases were revised since the ARVs at Ginna Station do not have a remote operated block valve. The spurious opening of an ARV is considered within the accident analyses such that a block valve is not required. As such, SR 3.7.4.2 was not added. This is an ITS Category (iv) change.

[ITS79.ii]:
1. The LCO is to verify the OPERABLE status of the atmospheric relief valve flowpath under both containment isolation conditions and alternate use as a steam dump path. Therefore, all components in this flowpath must be operable to meet the OPERABLE status for this LCO. The NUREG-1431 does not require the block valve to be remotely operated. A manual valve is acceptable. The assumed time to close this valve is a factor in the accident analyses assumptions. Therefore, please add in the "line" to ARV removed from the descriptions for this LCO.
2. SR 3.7.4.2 should be performed as required.
Status:[ ] Open
Discussion:

iii. The Applicability and Required Actions C.1 and C.2 were revised to only require the ARVs in MODES 1 and 2 and when the RCS average temperature is > 500°F in MODE 3. At Ginna Station, the ARVs are only credited in the accident analyses with respect to providing cool down capability following a SGTR in order to maintain subcooling margin. With the RCS average temperature < 500°F, the saturation pressure of the primary system is below the MSSV setpoints and the ARVs are not required. See the new bases for additional information. This is an ITS Category (i) change.

[ITS79.iii]:
This appears acceptable. Please verify that the additional reason this is different from the NUREG-1431 is also that the ARVs are not used for cool down to the RHR crossover temperature at 350°F.
Status:[ ] Open
Discussion:

iv. Condition B was revised to require entry into LCO 3.0.3 immediately when both ARVs are inoperable. Since Ginna Station only has two ARVs, the inoperability of both valves would result in the loss of a safety function as assumed in the accident analyses. This is an ITS Category (iv) change.

[ITS79.iv]:
The Required Action of rewritten Condition B (now C) could be "Be in MODE 3 in 6 hours" and in "Be in MODE 5 in 30 hours". This the more direct way of entering an LCO 3.0.3 shutdown. It is the TSB general policy not to prescribe entering LCO 3.0.3.
Status:[ ] Open
Discussion:

v. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including providing consistency with the accident analyses.

b. Various wording changes were made to improve the readability and understanding of the bases. This includes the deletion of text that is not related to the technical specification function performed by the ARVs.

[ITS79.v.a and b]:
1. In insert 3.7.4.1, the ARVs are located in the intermediate building on a tapped line off of the steam header downstream of the MSSVs and are not "on each SG".
2. In Background, the third paragraph deleted should be added after the insert 3.7.4.1.
3. In Applicable Safety Analyses, explain deletion of second paragraph. Add in deleted third paragraph.
4. In LCO, first paragraph the third and fourth sentences deleted are applicable here. Also explain insert 3.7.4.5 in lieu of deleted text.
5. In Actions A.1, the added text at the end seems misplaced and should be at the end of the previous sentence. Why are MSSVs deleted here?
6. In Completion Time for new B.1 from 6 hours to 8 hours has not been separately explained as why longer time is appropriate.
Status:[ ] Open
Discussion:

vi. The text of SR 3.7.4.1 was revised to provide consistency with other similar tests (see SR 3.4.11.1) and the bases. This is an ITS Category (iii) change.

80. ITS 3.7.5

i. The Auxiliary Feedwater (AFW) System at Ginna Station is comprised of two systems, a preferred AFW System and a Standby AFW (SAFW) System. Each system provides a portion of the overall AFW System function. The LCO, Conditions, Required Actions, Surveillances, and bases were all revised to reflect the functions of the preferred AFW and SAFW Systems as described in the new bases. The Conditions, Required Actions, and their Completion Times were also significantly revised consistent with current Ginna Station TS 3.4.2. However, several changes from the current Ginna Station TS were also made to provide consistency with the accident analyses and for human factor reasons. These changes are discussed in detail in Section D, item 14.ii. New Surveillances were also added with respect to the SAFW System consistent with current Ginna Station TS 4.8.

Reference 28 provides additional information. These are Category (i) and (ii) changes.

[ITS80.i]:
1. NUREG-1431 was developed with multiple condition entry. The proposed ITS does not work as written because new Conditions D and E are the same as new Condition G with different Required Actions. A rewrite is required to either achieve multiple condition entry, create single condition entry conditions or make two LCOs. The balance of comments on this LCO are dependent upon the format selected.
2. Please confirm that Ginna does not want a condition for an inoperable steam flowpath to the TDAFW pump per old Condition A.
3. The Conditions need to be arranged so the Completion Times are in descending order.
Status:[ ] Open
Discussion:

ii. The LCO Note and Condition E were not added, and the Applicability and associated bases were revised to only apply in MODES 1, 2, and 3 consistent with current Ginna Station TS 3.4.2. The requirement for AFW during MODE 4 when the SGs are being relied upon for heat removal is controlled by new LCO 3.4.6 which specifies required SG level requirements. Due to the wide variety of means of providing decay heat removal in MODE 4 (e.g., AFW, SAFW, MFW, condensate booster pumps), RG&E does not believe that it is necessary to specify AFW requirements. This is also discussed in Reference 26. This is an ITS Category (i) change. As such approved Traveller WOG-27, C.1 was only partially incorporated (see also Section C, item 80.iv below).

[ITS80.ii]:
UFSAR 10.5.3.1.2 clearly states that AFW is used to maintain steam generator water level during MODE 4 operations as the reactor is being shutdown. Therefore, this AFW Applicability requirement and the other LCO deleted requirements must be restored and/or rewritten to add provisions for a SAFW train.
Status:[ ] Open
Discussion:

iii. The Note for SR 3.7.5.2 and SR 3.7.5.3 was revised to require the turbine driven AFW pump to be tested prior to entering MODE 1 consistent with current Ginna Station TS 4.8.6. This is also discussed in Reference 28. This is an ITS Category (i) change.

[ITS80.iii]:
1. The revised note per insert 3.7.5.2 is acceptable for SR 3.7.5.2 and the new SR 3.7.5.6 only and not for proposed SR 3.7.5.3.
2. The existing TS relaxation to the SR 3.7.5.2 interval is not justified and it is rejected.
3. The new proposed SRs 3.7.5.3 and 3.7.5.4 are acceptable except the interval shall be same as SR 3.7.5.2.
Status:[ ] Open
Discussion:

iv. SR 3.7.5.3 and SR 3.7.5.4 were revised to delete "when in MODE 1, 2, or 3" from the end of the Surveillance description consistent with approved Traveller WOG-27, C.1. The bases state that these Surveillances should only be performed during shutdown conditions to prevent the possibility of creating a plant transient. The deleted text implies that this test should be only performed in MODE 1, 2, or 3. The intention of the two SRs is to ensure that AFW will correctly actuate when it is in its MODE 1, 2, or 3 configuration. Specifying this in the Surveillance is inconsistent with all other SRs (e.g., ECCS) and is unnecessary. This is an ITS Category (iii) change.

[ITS80.iv]:
1. It is acceptable to remove the text implying this test is only in MODES 1, 2 or 3 per the traveler.
2. A new note shall be added to new SRs 3.7.5.5 and 3.7.5.6 because AFW is used during MODE 4. The note is "This SR is not applicable in MODE 4 when steam generator is relied upon for heat removal." This is from NUREG-1431 Rev.1.
3. Does this justification suggest there are other new SR 3.7.5.5 text changes similar to new SR 3.7.5.6 which are needed and are not marked in the BASES? The text assumed an ESFAS signal would initiate this test rather than a simulated actuation signal. How does Ginna plan to conduct this test?
Status:[ ] Open
Discussion:

v. SR 3.7.5.5 was not added to the new specifications. The current Ginna Station TS do not contain this requirement. The verification of the correct lineup of the AFW and SAFW Systems is performed by SR 3.7.5.1. In addition, the AFW System takes suction from the CSTs during normal startup and shutdown conditions. The bases for SR 3.7.5.5 states that this SR is not required for plants which use the CST under these conditions. This is an ITS Category (iv) change.

vi. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including providing consistency with the accident analyses.

b. Various wording changes were made to improve the readability and understanding of the bases.

[ITS80.vi.a and b]:
1. As noted in ITS80.i the LCO statement, Applicability and Conditions are in need of rewrite, so no comment will be made until the formatting issues are finalized.
2. The BASES for SR 3.7.5.2 per change ITS80.iii, last paragraph, does not need to delete last sentence. Also the "may not have been" is not required and the "are" should be retained.
Status:[ ] Open
Discussion:

vii. Incorporation of approved Traveller NRC-01, C.2

viii. Incorporation of approved Traveller NRC-13, C.1.

[ITS80.viii]:
The incorporation of this traveller does not match the NUREG-1431 Revision 1 text in the BASES for SR 3.7.5.2. Please explain difference?
Status:[ ] Open
Discussion:

ix. The Completion Time limit of "10 days from the discovery to failure to meet the LCO" was not added to the new specification since Ginna Station currently does not have this requirement. The intent of adding this limit to the Completion Time is to prevent a plant from continuously being in the LCO without ever meeting the full AFW System requirements. This abuse of the LCO is best addressed under plant procedures since the addition of this limit to the Completion Time creates confusion among licensed personnel. Providing this limit can still result in LCO abuse since the AFW System can be declared OPERABLE for only a several minutes and then the LCO immediately entered for extended periods. Sufficient NRC guidance already exists with respect to extensive use of LCO time (e.g., Ref. 26). In addition, the Maintenance Rule (10 CFR 50.65) requires monitoring of equipment performance. Finally, a review of Ginna Station plant records indicates that the AFW System was out a service a total of 2600 hours from June 1990 and July 1994 (or 9% of the time in which the plant was in MODE 1, 2, and 3.

[ITS80.ix]:
This Completion time requirement is to guard against "flip-flop" between LCO conditions without restoring equipment fully operable. Since these conditions are to be rewritten per ITS80.i, this issue is deferred because it may not be needed.
Status:[ ] Open
Discussion:

81. ITS 3.7.6

i. The title, LCO, Surveillances and bases were revised to reflect that Ginna Station has two condensate storage tanks (CSTs) instead of one as referenced in NUREG-1431. This is an ITS Category (iv) change.

ii. The LCO was revised to require that the CSTs be OPERABLE with the specific OPERABILITY requirements specified in the Surveillance Requirement. In addition, Condition A, Required Action A.2, and SR 3.7.6.1 were revised to replace the reference to CST "level" with CST "water volume" which is the actual parameter used in the accident analyses. These changes provide consistency with LCO 3.5.4. These are ITS Category (iii) changes.

[ITS81.ii]:
It appears acceptable to change to "water volume" limits from "water level" limits; however, the following questions need addressing:
1. It is not clear that this LCO could only be in support of AFW and not also SAFW. What prevents the Condensate Test Tank being used for the source of water for SAFW if the Service Water System were unavailable?
2. What other water tanks are available which could be used by operators to meet the operability requirements of water volume for this LCO? Such as the all-volatile-treatment condensate storage tank and others?
3. How does refilling of the CSTs figure into the determination of the OPERABILITY? From the fire water systems or the condenser hotwell?
Status:[ ] Open
Discussion:

iii. The Applicability and Required Action B.2 were revised to only require the CSTs to be OPERABLE in MODES 1, 2, and 3 consistent with current Ginna Station TS 3.4.3. The requirement for the CSTs during MODE 4 when the SGs are being relied upon for heat removal is controlled by new LCO 3.4.6 which specifies required SG level requirements. Due to the wide variety of means of providing decay heat removal in MODE 4 (e.g., AFW, SAFW, MFW, condensate booster pumps), RG&E does not believe that it is necessary to specify CST requirements. This is also discussed in Reference 28. This is an ITS Category (i) change.

[ITS81.iii]:
1. UFSAR 10.5.3.1.2 clearly states that AFW is used to maintain steam generator water level during MODE 4 operations as the reactor is being shutdown. Therefore, since CST is the source for AFW this Applicability requirement and the other LCO deleted requirements must be restored and/or rewritten to add provisions for a SAFW train.
2. Also adhering to the improved TS format requires agreement between LCOs for Applicability, regardless of the possible in-depth capabilities of various supporting systems.
Status:[ ] Open
Discussion:

iv. The Completion Time for Required Action A.1 was revised to remove the continued verification every 12 hours of the backup water supply to the CSTs. The current Ginna Station TS 3.4.3 does not contain this requirement. In addition, the sources of water which would normally be used include the SW System (which has Lake Ontario as a water supply) and the all-volatile-treatment condensate storage tank which has a normal stored volume of 100,000 gallons (UFSAR Section 10.7.4). Either of these sources provide much more water than is required for AFW during a DBA or normal cool down. This is an ITS Category (i) change.

[ITS81.iv]:
What is the hardship created by this verification of the availability and determination of the OPERABILITY of alternate sources of water? The amount of water available is not as important as there being an OPERABLE pathway to deliver the water.
Status:[ ] Open
Discussion:

v. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including providing consistency with the accident analyses and bases for the CST water volume requirement.

b. Various wording changes were made to improve the readability and understanding of the bases.

[ITS81.v.a and b]:
1. Background first paragraph, last sentence is deleted; however, UFSAR 10.5.3.1.1 states all pumps have recirculation lines back to the CST?
2. Insert 3.7.6.1 first sentence refers to a non-seismic grade Service building. Insert "grade"?
3. Insert 3.7.6.2, it is presumed that SW water is the preferred (only?) source of water for SAFW regardless of the event or time into event.
4. The last sentence of insert 3.7.6.5 is not understood.
5. The loss of "all AC" electrical power means "onsite and offsite?" Please change to clarify.
6. In Applicability, MODE 4 is applicable.
Status:[ ] Open
Discussion:

82. ITS 3.7.7

i. The LCO, Conditions, and bases were revised to reflect the actual design of the component cooling water (CCW) system at Ginna Station. The CCW System is comprised of two 100% capacity pumps which feed a common loop header. This common loop header then splits into parallel flowpaths for two 100% capacity heat exchangers. The outlet of the heat exchangers then meet to re-form the common loop header which provides cooling water to the safety and nonsafety related system loads. The discharge flow through these system loads then combine to re-form the common header which provides suction to the two CCW pumps. As such, the LCO was revised to require the two CCW pump trains and the CCW loop header to be OPERABLE. The Note for Required Action A.1 was also not added since the inoperability of a single CCW train does not affect the ability of CCW to provide cooling to either RHR heat exchanger. This is an ITS Category (i) change.

[ITS82.i]:
1. It is acceptable to reformat the LCO and to not include the note for Required Action A.1 because one common header supplies the heat loads.
2. The existing TS require both CCW heat exchangers (HX) OPERABLE. Isn't this a relaxation to treat one as a standby? Provide justification as such.
3. Can one CCW HX handle all the heat load from all the safety-related and non-safety-related components cooled by CCW?
4. How often are the standby components put into service and operation? Are the previous components in service put into standby?
5. Why not continue with both HX inservice and have the extra capacity? With the passive component, there should be little maintenance required.
Status:[ ] Open
Discussion:

ii. A new Condition was added in the event that both CCW trains or the CCW loop header were inoperable. In this condition,

CCW cannot support the OPERABILITY of the ECCS and CS pumps and a loss of multiple safety functions exist. However, it is not prudent to enter LCO 3.0.3 in this condition since it would require entry into MODE 5 where CCW must be available to support the RHR heat exchangers. Instead, the new Condition requires immediate action to restore one CCW train or the loop header and to place the plant in MODE 4 within 12 hours. Restricting the cooldown to MODE 4 places the plant in a condition in which the RCPs and AFW can be used to provide decay heat removal while attempts to restore CCW continue. In the event that the RCPs or AFW is also lost, the time required before RHR must be available for decay heat removal is increased in this lower MODE. The change is also consistent with the Required Actions for a loss of RHR and current Ginna Station TS 3.3.3. This is an ITS Category (i) change.

[ITS82.ii]:
1. Why is this not an Owners Group Traveler for this requested change?
2. Shouldn't this Condition also have the note deleted from Required Action A.1?
3. Explain how Ginna will handle this new proposed Condition C with the existence of NUREG-1431 LCO 3.0.6 and Administrative Controls of 5.5.15, Safety Function Determination Program and Condition C of LCO 3.7.8?
Status:[ ] Open
Discussion:

iii. The CCW System is only required by the accident analyses during the recirculation phase following a LOCA and is manually initiated. Therefore, the CCW System does not receive any actuation signal such that SR 3.7.7.2 and SR 3.7.7.3 are not applicable to Ginna Station. However, a new Surveillance was added to require a complete cycle of the normally closed motor operated valves to the RHR heat exchangers. All other CCW flow paths to components required following a DBA are normally open and do not require testing. This is an ITS Category (i) change. As such, approved Traveller NRC-01, C.2 was not incorporated.

[ITS82.iii]:
1. Please clarify the actual intended use for CCW which the BASES state is for normal and accident conditions versus here where CCW is only required by accident analyses (above ITS82.ii imply CCW is essential to the RHR HX in MODE 5).
2. Regarding not adding SRs 3.7.7.2 and 3, doesn't the standby? CCW pump get a start signal when system pressure drops below 50 psig. Why is this not verified at refueling? Doesn't certain valves have to automatically open to align this pump to the loop header?
3. Traveler NRC-01, C.2 depends on above responses.
Status:[ ] Open
Discussion:

iv. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including providing consistency with the accident analyses for operation of the CCW System.

b. Various wording changes were made to improve the readability and understanding of the bases.

c. The text was revised to provide consistency with the bases for LCO 3.7.8.

[ITS82.iv.a, b and c]:
1. Provide a sketch of the loop header from the first and last isolation valves for each safety-related load. What type of valves are these? Which SR's apply to them? Are all non-essential loads manually or automatically isolated?
2. What are the normal CCW water temperatures during plant shutdown?
3. Why delete last sentence of background after insert 3.7.7.3?
4. The LCO operability requirements are very complex as described. It appears that some information may be relocated to the Background or elsewhere. Perhaps use of a table would help clarify presentation.
5. The last sentence of insert 3.7.7.5 needs a more explanation.
6. In Applicability, the LCOs supported by CCW needs identification by name rather than just number.
7. Changes made to Conditions and SRs noted above need modifications in BASES markup.
8. What condition is entered if the surge tank is inoperable?
9. Why relocate the note to SR 3.7.7.1 to the end?
Status:[ ] Open
Discussion:

v. SR 3.7.7.1 was revised to only require verification of manual and power operated valves in the CCW train or loop header flowpath that service post-accident related equipment which is a more accurate description of the actual SR. This is an ITS Category (iv) change.

[ITS82.v]:
The same sketch as noted in ITS82.iv, item #1 above and the responses are needed to evaluate this proposed change. The addition of SR 3.7.7.2 seems to counter this justification. The name change from safety-related to post-accident was not explained or justified.
Status:[ ] Open
Discussion:

vi. Incorporation of approved Traveller WOG-12, C.3.

83. ITS 3.7.8

i. The title was revised to be consistent with Ginna Station nomenclature which does not abbreviate the term "system" with respect to the Service Water (SW) System. This is an ITS Category (iv) change.

ii. The LCO, Conditions, and bases were revised to reflect the actual design of the SW system at Ginna Station. The SW System is comprised of two redundant trains. Each train includes two 100% capacity pumps which feed a common loop header. This common loop header provides cooling water to the safety and nonsafety related system loads. As such, the LCO was revised to require the two SW pump trains and the SW loop header to be OPERABLE. The Notes for Required Action A.1 were also not added since the inoperability of a single SW train does not affect the ability of SW to provide cooling to either RHR heat exchanger or the diesel generators. In addition, the LCO bases were revised to state that the SW loop header ends at the first isolation valve for any supplied component. If cooling water through or from any component required by the accident analysis is unavailable, then the applicable LCO should be entered. This is an ITS Category (i) change. A such, approved Traveller WOG-12, C11 was not incorporated.

[ITS83.ii]:
1. It is acceptable to reflect the Ginna SW system design. Also explain what is the normal and standby discharge header noted in UFSAR 9.2.1.1?
2. It is acceptable to delete notes 1 and 2 to Required Action A.1 provided assurance is established that the cross connect valves will never be closed. How will this be checked, if not by an unique SR?
3. The BASES need help and rewriting as noted in ITS83.iv.
4. The seventh sentence above is acceptable. Is this first isolation valve of the SW header the same isolation valve of LCO 3.6.3? Please state how this LCO would work with the LCO Note #3 to LCO 3.6.3? Should a similar note be placed here?
5. The eighth sentence is correct and the deleted Notes 1 and 2 of Required Action A.1 permit a cascade of these critical safety systems when cooling water was unavailable. In the new proposed Condition C, shouldn't those deleted notes should be added here?
6. In sentence ten, the traveler as noted has no comment number as identified as being applicable for this LCO. Please explain.
Status:[ ] Open
Discussion:

iii. A new Condition was added in the event that both SW trains or the SW loop header were inoperable. In this condition, SW cannot support the OPERABILITY of the SI pumps, CRFCs, CCW heat exchangers, diesel generators, or AFW pumps and a loss of multiple safety functions exist. However, it is not prudent to enter LCO 3.0.3 in this condition since it would require entry into MODE 5 where SW must be available to

support the RHR heat exchangers. Instead, the new Condition requires immediate action to restore one SW train or the loop header and to place the plant in MODE 4 within 12 hours. Restricting the cooldown to MODE 4 places the plant in a condition in which the RCPs and AFW can be used to provide decay heat removal while attempts to restore SW continue. In the event that the RCPs or AFW is also lost, the time required before RHR must be available for decay heat removal is increased in this lower MODE. This is an ITS Category (i) change.

[ITS83.iii]:
1. Why is this not an Owners Group Traveler for this requested change?
2. The acceptance of this Condition is dependent upon response to item #5 of the above [ITS83.ii].
3. Given the stated importance of the SW supported systems, shouldn't all the supported systems of SW system be cascaded in this LCO?
4. Explain how Ginna will handle this new proposed Condition C with the existence of NUREG-1431 LCO 3.0.6 and Administrative Controls of 5.5.15, Safety Function Determination Program?
Status:[ ] Open
Discussion:

iv. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including providing consistency with the accident analyses for operation of the SW System.

b. Various wording changes were made to improve the readability and understanding of the bases.

c. The text was revised to provide consistency with the bases for LCO 3.7.7.

[ITS83.iv.a, b and c]:
1. As noted above, it is acceptable to state the Ginna design but this background markup for paragraphs 2 and 3 is illegible. What happened to insert 3.7.8.1?
2. With the addition of insert 3.7.8.4, there is redundant wording in the markup.
3. In insert 3.7.8.2.a, the acceptable and unacceptable electrical train pairs should be stated. The electrical/mechanical division need better descriptions.
4. The addition of the Ultimate Heat Sink should be placed in its own LCO as per the guidance of NUREG-1431. Therefore, the contents of the LCO operability BASES could be significantly reduced in size to make a more concise statement. Various parts are background and could be relocated as appropriate. Suggest use of a table to clarify operability requirements.
5. In Applicability, the LCO supported should be identified by name rather than numbers due to renumbering possibilities.
6. Insert 3.7.8.11 may change based upon comments to ITS83iii.
7. Why move the note description to SR 3.7.8.1? The six-sets of isolation valves need identification. Also, how are the cross connect valves defined are separate from others and why shouldn't they be verified as open in their own SR?
Status:[ ] Open
Discussion:

v. Incorporation of approved Traveller WOG-12, C.3.

[ITS83.v]:
Explain where and why this was incorporated into this LCO. The Excel listing shows this traveler was limited to LCO 3.7.7!
Status:[ ] Open
Discussion:

vi. Incorporation of approved Traveller NRC-01, C.2.

84. ITS 3.7.9

i. This LCO and associated bases were not added to the new specifications. The current Ginna Station TS do not contain any requirements for the Ultimate Heat Sink (UHS). In addition, the UHS for Ginna Station is Lake Ontario (there are no installed cooling towers) and the only safety related function which requires the UHS is the SW System. As such, the bases for LCO 3.7.8 were revised to specify that the SW trains are considered OPERABLE when sufficient NPSH is available and the temperature of the SW suction source was within acceptable limits. These limits are then controlled by the Bases Control Program. It should be noted that the NPSH requirement for the SW pumps is far less than other equipment (i.e., Circulating Water Pumps and Fire Water Pumps) such that sufficient alarms and indications would be

available to plant operators. This is an ITS Category (i) change.

[ITS84.i]:
1. How is Ginna different from other Westinghouse standard designs or other plants which take their water from lakes or cooling ponds?
2. Doesn't the UHS still satisfy the Criterion #3 of the NRC Policy statement?
3. The UHS is the source for the SW System so retain this LCO with only Condition B as the "UHS is inoperable." with SRs 3.7.9.1 and 3.7.9.2. The proposed inserts 3.7.8.6 and 3.7.8.9 to LCO 3.7.8 are clearly the basis for needing a separate LCO.
4. Renumbering of LCOs, SRs and BASES are required.
5. Modification of BASES for 3.7.8 is expected.
Status:[ ] Rejected
Discussion:

85. ITS 3.7.10

i. The LCO title was renamed consistent with Ginna Station nomenclature. In addition, the LCO was renumbered due to the deletion of LCO 3.7.9 (UHS). These are Ginna TS Category (iv) changes.

[ITS85.i]:
1. It is acceptable to rename the title of this LCO.
2. The renumbering is not required because there will be no deletion of LCO for UHS. This will only be noted once in spite of other renumbering.
Status:[ ] Open
Discussion:

ii. The Control Room Emergency Air Treatment System (CREATS) consists of one filtration train and redundant dampers (see bases and current Ginna Station TS 3.3.5). The current Ginna Station TS allow the filtration train to be inoperable up to 48 hours since the successful operation of the control room isolation dampers will result in acceptable doses within the control room. However, if any radioactive gas were released and entered the control room environment, there is no means to remove the gas. Therefore, 48 hours was determined to be acceptable Completion Time for restoring the system to OPERABLE status or to place the CREATS in the toxic gas mode. In addition, since there are redundant dampers, inoperability of the dampers were treated similar to the CREF trains in NUREG-1431 (i.e., a Completion Time of 7 days is allowed to restore one inoperable damper and a requirement to enter LCO 3.0.3 with two inoperable dampers for a given outside air flowpath). These changes provide consistency with the accident analyses and with NUREG-1431 to the greatest degree possible. These are ITS

Category (i) changes. As such, approved Travellers WOG-24, C.5 and NRC-01, C.2 were not incorporated.

[ITS85.ii]:
1. With the filtration train inoperable, CREATS is inoperable as a cleanup system. Condition A should just state "CREATS is inoperable". This is the way existing TS 3.3.5.2 is stated. The insert 3.7.9.2 is acceptable if the logical connector were AND therefore no gas radioactive or toxic could enter the control room as justified above. The note to new A.2 defeats this required action. The time should be limited to 5 minutes or less for one room air exchange with the operators on Scott Air packs.
2. New Condition B is acceptable if worded this way: "One CREATS redundant isolation damper open and inoperable in one or more outside flowpaths". To which redundant dampers or damper pairs does this Condition B apply? With any damper closed and inoperable (example AKD07 or AKD09), full operation of the CREATS is not possible. This is also the same as new Conditions E and F for an unisolable flowpath to the outside which are subsets of CREATS being inoperable or being in Condition A. Please explain or correct if this is not the case. Also a copy of UFSAR Figure 6.4-1 should be provided.
3. Condition A and B should be reversed for descending Completion Times.
Status:[ ] Open
Discussion:

iii. Condition C was revised to require placing the OPERABLE CREATS isolation dampers in the emergency radiation protection mode whenever the Required Actions of Conditions of A or (new) B are not met in MODE 5 or 6, or during fuel movement. The emergency radiation protection mode is a more conservative configuration since no outside air is allowed into the control room. Since the dose rates to the operators has been determined to be acceptable with the control room isolated, this is preferred the configuration. This is an ITS Category (i) change.

[ITS85.iii]:
1. New Condition D (revised Condition C) should keep "or during movement of irradiated fuel assemblies".
2. The Logical Connector between D.1 and D.2 should be OR.
3. The markup states "Place in Mode F". Is this the same as the "emergency radiation protection mode" noted above? The BASES do not have names associated with the Modes A thru F.
Status:[ ] Open
Discussion:

iv. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including providing consistency with the accident analyses for operation of the CREATS.

b. Various wording changes were made to improve the readability and understanding of the bases.

[ITS85.iv.a and b]:
1. What happened to inserts 3.7.9.1 and 3.7.9.2?
2. In the first paragraph of Background, chemical or toxic gas need not be deleted.
3. In the second paragraph of Background, CREATS should be stated as one train only. Redundant damper pairs are not mentioned. Also the air conditioning unit and its AC fan are not mentioned.
3. In insert 3.7.9.4, the names associated with the Modes A thru F are not identified as used in revised Condition C or the following paragraph of the Background.
4. The deletion of paragraph 7 and 9 should be retained and modified for the Ginna design parameter.
5. The third deleted paragraph of Applicable Safety Analyses should be relocated to LCO to state that any active failure of a component will impair the CREATS operation.
6. In the LCO, the redundant damper pairs should be identified separate from those in insert 3.7.9.7. Also, the last balloon insert to this section is not explained, justified or understood.
7. In Applicability, why are the waste gas decay tanks located offsite and then, if so, why would they affect the control room. What is [82.vi] justifying here?
8. Specific questions on the Actions and SRs will be given later after responses to the above LCO questions are received.
Status:[ ] Open
Discussion:

v. SR 3.7.10.4 was not added to the new specifications. The current Ginna Station technical specifications do not contain this requirement. The control room environmental control systems were assessed as part of TMI Action Plan requirements (i.e., NUREG-0737, Supplement 1, item III.D.3.4) and found to be acceptable (Ref. 28). Therefore, RG&E does not believe that this surveillance is required. This is an ITS Category (i) change.

[ITS85.v]:
1. Reference 28 is not available but the control system is acceptable assuming the system can maintain its function. This SR merely tests to verify that the control room can be pressurized at the designed flow rate to minimize the air infiltration. Without this test, how is CREATS operation determined to be OPERABLE.
2. As noted in ITS85.i above, SR 3.7.11.1 is needed here.
Status:[ ] Open
Discussion:

vi. Approved Traveller WOG-12, C.2 was not added since the CREATS is required to be OPERABLE in MODE 6 which includes

all CORE ALTERATIONS by definition. This is an ITS Category (iv) change.

[ITS 85.vi]:
This appears acceptable. What does the traveler state as the justification or reason for adding this to this LCO?
Status:[ ] Open
Discussion:

86. ITS 3.7.11

i. This LCO and associated bases were not added to the new specifications. The current Ginna Station TS do not contain any temperature control requirements for the control room environment. The existing system was evaluated and found to be acceptable as part of the TMI Action Plan Requirements (i.e., NUREG-0737, Supplement 1, item III.D.3.4). This is an ITS Category (i) change. As such, approved Travellers WOG-12, C.2 and WOG-24, C.1 were not incorporated.

[ITS86.i]:
NUREG-1431 LCO 3.7.11, CREATCS is now a part of the Ginna proposed LCO 3.7.9. Per UFSAR Section 6.4, the Air Conditioning Unit is an integral in-line series component of CREATS operating flowpath. If this unit is inoperable, CREATS is inoperable. The air conditioning unit is just another component in determining the operability of CREATS, so only the SR 3.7.11.1 needs to be added to the Ginna proposed LCO for CREATS.
Status:[ ] Open
Discussion:

87. ITS 3.7.12

i. This LCO and associated bases were not added to the new specifications. The current Ginna Station TS do not contain any requirements for a ECCS pump room exhaust air cleanup system (PREACS). The bases for this LCO state that the PREACS is used for filtering air from the area of active ECCS components during the recirculation phase of an accident and to provide environmental control (e.g., temperature and humidity). Standard Review Plan 15.6.5 states that for plants which do not provide an ESF atmosphere filtration system, 50 gpm leakage from a gross failure of a passive component should be assumed 24 hours after an accident. This is assumed for Ginna Station with respect to the RHR pumps (UFSAR, Section 5.4.5.3.5). In addition, UFSAR Section 9.4.2 states that the cooling systems related to ECCS equipment are not required even with both trains of ECCS in operation. Therefore, this LCO does not apply to Ginna Station and was not added to the new specifications. This is an ITS Category (i) change.

[ITS87.i]:
1. It should be noted that the LCO provides requirements for both room temperature control and air cleanup systems. The UFSAR reference is assumed to be specifically 9.4.2.4.1, Effect of Loss of Cooling on Pumps and Valves. This does state that all pumps in this room can operate without cooling systems. The UFSAR reference to Section 5.4.5.3.5 could not be accessed due to an incompatible file error. Please provide this reference to show that this LCO is not required for this pump room.
2. UFSAR 9.4.9, Engineered Safety Features Ventilation Systems state other rooms and areas of the plant where systems are install require cooling. Please evaluate these areas per the LCO criterion of the policy statement. Example the Standby Auxiliary Feedwater System.pump room appears to be only an addition and may not be a part of the Auxiliary Building Ventilation System.
Status:[ ] Open
Discussion:

88. ITS 3.7.13

i. The LCO title was renamed consistent with Ginna Station nomenclature since there is no separate fuel building. In addition, the LCO was renumbered due to the deletion of previous sections. These are Ginna TS Category (iv) changes.

ii. The LCO, Applicability, Conditions, Surveillances, and the bases were all revised to be consistent with current Ginna Station TS 3.11.1. This requires the Auxiliary Building Ventilation System (ABVS) associated with the SFP to be OPERABLE when fuel is being handled or stored in SFP which has decayed < 60 days since being irradiated. The ABVS is defined as one Auxiliary Building exhaust fan, the Auxiliary Building exhaust fan 1C, SFP charcoal absorbers, and roughing filters. The ABVS only ensures that offsite doses are well within 10 CFR 100 limits in the event of a fuel handling accident. If the ABVS were unavailable, offsite doses would increase, but remain below 10 CFR 100 limits. Therefore, single failures or a loss of offsite power is not a consideration for this LCO. If the minimum ABVS is inoperable, the new Condition requires suspension of movement within the Auxiliary Building immediately which prevents a fuel handling accident from occurring that requires the ABVS. Since the ABVS is a non-Engineered Safety Features system, and is only required following a fuel handling accident, the majority of surveillance requirements do not apply to Ginna Station. The only SRs which are necessary are those related to the VFTP and to ensure that the system is in operation during fuel movement or CORE ALTERATIONS (new SR 3.7.10.1). All other SRs which require operation of system heaters (SR 3.7.13.1), verify

actuation of the ABVS on a safety injection signal (SR 3.7.13.3), verify the ability to maintain a negative pressure in the fuel handling building (SR 3.7.13.4) or verify that the bypass damper can be closed (SR 3.7.13.5) do not apply to Ginna Station and were not added. These are ITS Category (i) changes. As such, approved Traveller WOG-24, C.6 was not incorporated.

[ITS88.ii]:
1. It is acceptable to adapt the FBACS LCO to the Ginna ABVS design and to place the components required OPERABLE in the BASES. The markup as supplied provides information which confuses the identity of the respective ventilation fans, filters and ductwork in the operating train(s?). Please provide the UFSAR Figures 9.4-4 through 9.4-8 to clarify the intent of insert 3.7.10.1.
2. This LCO should also applies other accidents besides just a fuel handling accident. As noted in the justification for deletion of NUREG-1431 LCO 3.7.12, there is no room cleanup system, so radioactive particulates must be filtered by the respective building ventilation systems. There is no mention of the portions of the intermediate building and other auxiliary building areas which are also ventilated by ABVS. Also since the High Energy Line Break Analysis was performed after the plant was designed, what effect would the steam isolation dampers not closing have upon the operation of ABVS. Please explain.
3. ABVS appears to be continuously in operation for reasons other than a just FHA. Why shouldn't the Applicability be "at all times." All Owners Groups have accepted any irradiated fuel movement as appropriate applicability rather than a $\leq$ 60 day limitation. Why can't Ginna?
4. Since the ABVS is in operation, it is acceptable to replace with new SR 3.7.10.1.
5. It is acceptable (as noted in CTS21.ii) that a negative pressure is now the basis for acceptable operation in lieu of existing TS 3.11.1.c; so, the retention of old SR 3.7.13.4 is appropriate.
6. The ABVS train realigns itself upon a high radiation signal as noted in UFSAR 9.4.2.2.1 and insert 3.7.10.1. Therefore old SRs 3.7.13.3 and 3.7.13.5 should be retained.
Status:[ ] Open
Discussion:

iii. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including using Ginna Station nomenclature and providing consistency with the accident analyses for operation of the ABVS.

b. Various wording changes were made to improve the readability and understanding of the bases.

[ITS88.iii.a and b]:
1. There is no mention of the new fuel area which is served by the air handling unit of ABVS.
2. In the first paragraph of Background, last sentence, last balloon insert is mislocated.
3. As noted above, insert 3.7.10.1 will need streamlining.
4. In Applicable Safety Analyses, third deleted sentence should stay. In the balloon insert to the fourth sentence, why are the listed components "functional" and not "operable." Lastly, the inserted word just prior to insert 3.7.10.2 is not legible.
5. Insert 3.7.10.3 is acceptable but appears to be best relocated to the background.
6. In LCO, the components operable will be determined after receipt of the Figures accompanying this design, noted above.
7. Specific comments on Applicability, Actions and SRs will come later.
Status:[ ] Open
Discussion:

iv. The text of SR 3.7.10.2 was revised to reflect that only the SFP Charcoal Absorber System is required to be verified since the ABVS has several charcoal filter components. This is an ITS Category (iv) change.

[ITS88.iv]:
1. The UFSAR has no mention of the SFP Charcoal Absorber (or Adsorber) System any where when checked by ZYINDEX. What and where is this system?
2. It is appropriate that the " ? " system have filter testing per VFTP and an SR is required. Are there other filtering systems which also should be tested as a part of the whole ABVS?
3. The various BASES references do not agree on whether this is an "absorber" filter or an "adsorber" filter. The later is the more likely candidate and matches existing TS 4.11.1.
4. Existing TS 4.11.1.d is missing for this system and should be added as a new SR. See CTS38.iii.
5. Why are the Auxiliary Building Charcoal Filters not tested also?
Status:[ ] Open
Discussion:

89. ITS 3.7.14

i. This LCO and associated bases were not added to the new specifications since Ginna Station does not have a penetration room exhaust air cleanup system (PREACS). The bases describe the PREACS as a system which filters air from the penetration area between containment and the Auxiliary Building. At Ginna Station, the containment an Auxiliary Building are joined such that there is no space (i.e., penetration area) between these buildings. Therefore, this LCO is not applicable to Ginna Station. This is an ITS Category (i) change.

[ITS89.i]:
It is acknowledged that there may not be an area of the plant located as described in the BASES or known as "the penetration area"; however, the LCO is reserved for filtration and/or ventilation systems which perform essentially the same function. Even if there is nothing in the existing TS, Ginna is requested to determine whether a similar function exists for this type of LCO. An example is the UFSAR Section 9.4.1.2.10 refers to a Penetration Cooling System. Is this area also filtered?
Status:[ ] Open
Discussion:

90. ITS 3.7.15

i. The title was revised to be consistent with Ginna Station nomenclature including the use of abbreviation "SFP" for "spent fuel pool." This is an ITS Category (iv) change.

ii. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific background information with respect to the design of the spent fuel pool (SFP) and the SFP Cooling System was added.

b. Discussions of non-TS related functions of maintaining level in the SFP were deleted. This type of information is contained in the UFSAR, procedures, and other more appropriate documents.

c. Various wording changes were made to improve the readability and understanding of the bases and to reflect plant-specific considerations.

d. The bases were expanded to discuss why the LCO was not applicable for other plant conditions.

[ITS90.ii.a, b, c, and d]:
1. The deleted portion of the first paragraph of Background are true statements. Why removed them? At the end of the balloon insert, begin "It also shields....etc".
2. In the first line of Applicable Safety Analyses, pool should be deleted.
3. In insert 3.7.1.5.2, the "decontamination factor" is not understood. Please explain.
4. In several places, the use of the word phrase "active fuel" is not clear. Is this off loaded fuel awaiting reloading? Explain or use different term.
5. In LCO, what is the level of the SFP required when no fuel movement is occurring and fuel is just being stored?
6. The addition of the balloon insert after periodically in the SR 3.7.15.1 is dependent upon the answer to item 5 above. Also, the 31 day frequency is on hold.
7. The last paragraph of insert 3.7.15.4 is challenged as not an acceptable manner to verify SFP water level.
Status:[ ] Open
Discussion:

iii. The Frequency for SR 3.7.15.1 was revised from 7 days to 31 days. Ginna Station currently does not have this Surveillance Requirement. However, consistent with the current surveillance for SFP boron concentration (Ginna Station TS Table 4.1-2, #17), a monthly surveillance of SFP water level is considered adequate due to the design of the SFP as discussed in the bases.. This is an ITS Category (i) change.

[ITS90.iii]:
The current TS surveillance interval for boron concentration appears to be monthly during all operational modes. The proposed ITS interval of seven days is more consistent with the anticipated activity around the SFP since it is concurrent during the movement of irradiated fuel. This 7-day interval was selected as consistent with safe conduct of operations around a fuel storage pool. Most plants have adopted these recommendations along with the improved TS format. Why can't Ginna?
Status:[ ] Open
Discussion:

91. ITS 3.7.16

i. The title was revised to be consistent with Ginna Station nomenclature including the use of "SFP" for "spent fuel pool." This is an ITS Category (iv) change.

ii. The LCO and associated bases were revised to relocate the actual boron concentration limit to the COLR. This change

provides consistency with other similar requirements (e.g., ITS 3.9.1). This is an ITS Category (iii) change.

[ITS91.ii]: Please see questions on CTS28.ii.g!
1. Why is this not a WOG proposed traveler to the STS?
2. When was the last time the boron concentration had to change to warrant it being placed in the COLR?
3. This change is on hold because it is dependent upon the co-review with the Reviewers for Chapters 3.9, 4.0, COLR and possibly 3.4.
Status:[ ] Open/NRC HOLD
Discussion:

iii. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific background information with respect to the design of the SFP was added including discussion concerning Integral Fuel Burnable Absorbers as used in Region 1.

b. Various wording changes were made to improve the readability and understanding of the bases and to use Ginna Station nomenclature.

c. The text was revised to provide consistency with the bases for LCO 3.7.17. (Note - this is an ITS Category (iii) change.)

[ITS91.iii]:
1. For consistency with the markup for LCO 3.7.17, add "into a region" after "assembly" in the last sentence of Background.
2. Page B 3.7-82 is missing from the markup in this Submittal.
3. Insert 3.7.16.4 is not understood for which analysis?
4. Insert 3.7.16.5 is acceptable except for the last sentence. This implies the LCO no longer applies and Ginna can continue fuel movement with the boron concentration out of limit. As deleted in the paragraph, this is not allowed as intended under the guidance of NUREG-1431.
5. Please explains insert 3.7.16.6, as stating SR "must continue to be performed" when SR interval is proposed to be lengthened to 31 days. Also the balloon insert in lieu of the deleted text as reliant upon plant procedure is not adequate justification. See ITS91.v below.
Status:[ ] Open
Discussion:

iv. Required Action A.2.2 was revised to require performance of a SFP verification instead of verifying that a SFP verification had already been performed. If a SFP verification had been performed, then this LCO would not be in effect per the Applicability. This change provides consistency with the intended option to immediately perform

the verification when the SFP boron concentration is not within limits. This is an ITS Category (iii) change.

[ITS91.iv]:
This is acceptable to actually perform the "SFP verification" instead of verifying whether it had been performed. The definition of what constitutes an "SFP verification" is not defined as yet other than a parenthetical reference. Should the LCO or the BASES clarify this definition?
Status:[ ] Open
Discussion:

v. The Frequency for SR 3.7.16.1 was revised from 7 days to 31 days consistent with current Ginna Station TS Table 4.1-2, #17. Since the boron concentration is not expected to change rapidly due to the large volume of water which is available, a monthly verification is considered acceptable. This is an ITS Category (i) change.

[ITS91.v]:
The current TS surveillance interval for boron concentration appears to be monthly during all operational modes. The proposed ITS interval of seven days is more consistent with the anticipated activity around the SFP since it is currently based upon the last movement of irradiated fuel. This 7-day interval was selected as consistent with safe conduct of operations around a fuel storage pool. Most plants have adopted these recommendations along with the improved TS format. Why can't Ginna?
Status:[ ] Open
Discussion:

92. ITS 3.7.17

i. The title was revised to be more consistent with the actual LCO since new fuel can be stored in the SFP if the fuel assembly meets the necessary requirements. Also, the abbreviation "SFP" for "spent fuel pool" was used consistent with Ginna Station nomenclature. This is an ITS Category (iii) change.

ii. The LCO and Applicability were revised to provide requirements for both regions of the SFP. This change was required since both Region 1 and Region 2 have limits with respect to the fuel to be stored in addition to the upper U-235 enrichment limit of 5.05 weight percent. As such, Required Actions were necessary if these limits are exceeded. In addition, separate Surveillances were added for each Region to ensure that the limits are met. These limits are consistent with Reference 29. This is an ITS Category (i) change.

[ITS92.ii]:
1. Please provide the relevant parts of Reference #29 to verify these new LCO limits.
2. Add a new item c. to the LCO statement as follows: "Fuel assemblies not meeting a or b above shall be stored in accordance with Specification 4.3.1.1."
3. Add a new item d. to the LCO statement as follows: "The SFP temperature shall be less than 120°F during normal operations and less than 150°F during full core discharge situations." The capacity of the SFP is limited by the heat removal capability of the SFP pooling system as is noted in first paragraph of UFSAR Section 9.1.2. As noted in UFSAR Section 9.1.3.1, this limit is needed to maintain the structural integrity of the SFP.
4. The deleted text of SR 3.7.17.1 shall be retained and similarly added to new Proposed 3.7.13.1.
Status:[ ] Open
Discussion:

iii. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific background information with respect to the design of the SFP was added including discussion concerning Integral Burnable Absorbers as used in Region 1.

b. Various wording changes were made to improve the readability and understanding of the bases and to use Ginna Station nomenclature.

c. The text was revised to provide consistency with the bases for LCO 3.7.16. (Note - this is an ITS Category (iii) change.)

[ITS92.iii.a, b and c]:
1. In Background, the last sentence of the first paragraph shall be retained. Also retain this deleted sentence in LCO.
2. In Background, second paragraph second sentence should be "specify that a limiting k_{eff} ..." to agree with markup to LCO 3.7.16.
3. New BASES Figure B 3.7.16-1 is missing and is needed for further review.
4. Other comments on LCO Statement, Conditions, Actions may come depending upon the resolution of ITS92.ii.
Status:[ ] Open
Discussion:

93. ITS 3.7.18

i. This LCO was renumbered due to the deletion of previous LCO sections. This is an ITS Category (iv) change.

ii. The Completion Times for Required Actions A.1 and A.2 were revised consistent with current Ginna Station TS 3.1.4.4 which allow 8 hours to reach MODE 3 and 40 hours to reach MODE 5. This small increase in time is considered minor and acceptable since the accident analyses have been performed using very conservative values for primary system I-131 and no credit is taken for activity plateout or retention. This is an ITS Category (i) change.

[ITS93.ii]:
1. Will this be the only place in the improved Ginna TS where the times for an orderly shutdown will be different for all others? If so, why not standardize across all the improved Tech Specs for what has been stated as a minor increase. A small difference like this creates more confusion in procedure writing than will be gained by the extra two hours at each MODE level.
Status:[ ] Open
Discussion:

iii. The bases were revised as follows (these are ITS Category (iv) changes):

a. Plant-specific design considerations were added including using Ginna Station nomenclature and providing consistency with the dose analyses.

b. Various wording changes were made to improve the readability and understanding of the bases.

[ITS93.iii.a and b]:
1. What are the specific 10CFR100 limits as established by the NRC staff for Ginna per the licensing documents?
2. The Completion Times for Action A.1 and A.2 are under discussion.
Status:[ ] Open
Discussion:

iv. Incorporation of approved Traveller WOG-24, C.5

Section 3.7 Current TS

9. Technical Specification 3.1.4

i. TS 3.1.4.4 - This specification was revised to only require shutdown to MODE 3 with T_{avg} < 500°F within 8 hours versus Cold Shutdown within 40 hours consistent with the LCO Applicability. This is a Ginna TS Category (v.c) change.

[CTS9.i-?1]:
1. Where is this item in the CTS markup?
2. If this is a v.c change (technical equivalence) then what is revised?
3. The MODE names for Ginna are proposed to only be changed and not the MODE numbering; so, the shutdown to MODE 3 in ITS LCO 3.7.14 is the same as existing TS 3.1.4.4.
4. The issues/changes to the existing TS pertaining to Completion Times and Applicability are covered in CTS9.ii below.
Status:[ ] Open
Discussion:

ii. TS 3.1.4.1.c - The limit on secondary coolant activity is now required to be met in MODES 1, 2, 3, and 4 and not just when the reactor is critical or RCS temperature is > 500°F. The secondary coolant activity limit is based on a steam line break and the resulting dose consequences. A RCS temperature of > 500°F is based on preventing the MSSVs from lifting following a SGTR (i.e., a RCS temperature of > 500°F is only applicable to primary system activity limits not secondary limits). In addition, if the secondary coolant activity limits are not met, TS 3.1.4.4 requires entering cold shutdown (i.e., MODE 5) within 40 hours. Requiring the secondary coolant activity limits to be met for all of MODE 4 (i.e., RCS is > 200°F) provides consistency with NUREG-1431 and the current Required Actions if the limit is exceeded. This is a Ginna TS Category (iv.a) change.

[CTS9.ii-M1]:
It is acceptable to make Applicability MODES 1, 2, 3 and 4.

[CTS9.ii-M2]:
1. As noted in CTS9.i above, the changes to the existing TS are not clear. There is assumed to be only one change which is a longer Applicability.
2. It is recommended that Ginna standardize its orderly shutdown times for all LCOs as explained in ITS93.iii to LCO 3.7.17.
Status:[ ] Open
Discussion:

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13. Technical Specification 3.3

xvi. TS 3.3.3.1 - This was revised to only require one of the two CCW heat exchangers to be OPERABLE and to specify that the CCW loop header must also be OPERABLE. As discussed in Section C, item 82.i above, the CCW heat exchangers are 100% redundant and are separated from the CCW pump trains by a section of common piping. The CCW heat exchangers are passive devices such that any failure of a heat exchanger is bounded by a failure of the CCW piping in the loop header. The loop header is defined as the section of piping from the discharge of the pumps to the first isolation valve of each supplied component. The loop header then continues from the last isolation valve on the discharge of the supplied component to the suction of the pumps. Since there is no single active failure which must be considered for the heat exchangers, they are considered part of the CCW loop header and only one heat exchanger must be OPERABLE. Requiring the CCW loop header to be OPERABLE provides a clear and concise LCO requirement for operators. These are Ginna TS Category (v.b.13) and (v.a) changes.

[CTS13.xvii-L1]:
1. This change is on hold pending resolution of the issues raised in ITS82.ii and ITS82.iv.
2. The deletion of existing TS 3.3.3.2.b is not specifically addressed in the CTS markup or justification. Please provide.
Status:[ ] Open
Discussion:

[CTS13.xvii-M1]:
1. The v.a change part of this justification is not clear. Is it the definition of the common loop header?
2. If so, what has changed other than reflecting the current Ginna hardware design in the ITS for an equivalent reformatting? If not, please explain?
Status:[ ] Open
Discussion:

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xvii. TS 3.3.3.2 - This was revised to allow 72 hours (versus 24 hours) to restore an inoperable CCW pump before requiring a plant shutdown. However, the plant is no longer allowed to remain at Hot Shutdown for 48 hours before requiring additional cooldown to Cold Shutdown conditions. As such, the total time in which a CCW pump can remain inoperable remains the same (i.e., 72 hours) but the plant is not required to begin cooldown activities after 24 hours. The only safety related functions supported by the CCW System

are with respect to the RHR, SI, and CS Systems, which all allow 72 hours to restore an inoperable train. Therefore, this change provides consistency within the new specifications. This is a Ginna TS Category (v.c) change.

[CTS13.xvii-L or M?]:
It is not clear whether this is less restrictive, more restrictive or just equivalent. It is so closely coupled to new Condition C that it will have to be discussed as an apparent relaxation. This appears acceptable pending resolution of the issues raised in ITS82.ii.
Status:[ ] Open
Discussion:

xviii. TS 3.3.4.1 - This was revised to require that the six sets of motor operated isolation valves used in the SW System to be OPERABLE for the SW System to be considered OPERABLE. Credit is taken for these valves to isolate the nonessential and nonsafety related components within the SW System following a coincident safety injection and undervoltage signal. This is a conservative change which provides a clarification to licensed personnel. This is a Ginna TS Category (v.a) change.

[CTS13.xviii-M1]:
1. The six sets of insolation valves are not readily identifiable from the line drawing of the SW System dated 12-6-91. Only four sets are found here for non-safety related components and two sets are for safety-related components. Explain further.
2. Are these automatic valves which isolate on the SI or undervoltage signal?
3. Which SR covers these valves and why not have their own separate SR?
4. Need terminology protocol to clarify these valves separate from the cross-connect valves of other systems.
5. As noted in ITS83.iv.a, the background text is illegible and needs rewriting.
Status:[ ] Open
Discussion:

xix. TS 3.3.4.2 - This was revised to allow one SW train comprised of two pumps and six motor operated valves supplied by the same electrical train to be inoperable for 72 hours before requiring a plant shutdown. Since the SW trains are 100% redundant, removing one of two trains only affects redundancy and does not place the plant outside the accident analyses. Since most other safety functions allow 72 hours for one train to be inoperable (e.g., ECCS trains), this change provides consistency within the new

specifications. In addition, this specification was revised to address the scenario if all SW pumps or the SW loop header are inoperable. In this condition, immediate action must be initiated to restore one SW pump or the loop header to OPERABLE status; however, it is not prudent to exit the MODE of Applicability since the SW System is required in MODE 5 for decay heat removal. Instead, Required Actions have been provided to require a cooldown to MODE 4. In this lower MODE, AFW is providing for decay heat removal. If AFW were lost, additional time is required before RHR (and consequently SW) would be required. This change is also consistent with the Required Actions for loss of CCW. These are Ginna TS Category (v.c) changes.

[CTS13.xix-L1]:
1. This is not a technically equivalent v.c change but a relaxation for the LCO 3.7.8 Condition A which has not been justified as a less restrictive v.b change. Pleased provide as such.
2. This appears acceptable pending the resolution of the issues in ITS83.ii.
Status:[ ] Open
Discussion:

[CTS13.xix-L2]:
1. This is not a technically equivalent v.c change but a relaxation for the LCO 3.7.8 new Condition C which has not been justified as a less restrictive v.b change. Pleased provide as such.
2. This appears acceptable pending the resolution of the issues in ITS83.iii.
3. Also, the CTS markup appears to be missing the new proposed Condition C.
Status:[ ] Open
Discussion:

xx. TS 3.3.5.1 - This was revised to require the control room emergency air treatment system (CREATS) to be OPERABLE in MODES 1 through 6 and during movement of irradiated fuel assemblies instead of only when RCS is ≥ 350°F. Current Ginna Station TS 3.5.6 requires that the control room HVAC detection system (i.e., chlorine, ammonia, and radioactivity monitors) be OPERABLE at all times. However, the filtration system is only required to be OPERABLE above 350°F. The filtration system is designed to ensure that dose rates to operators are within the guidelines of GDC 19 in the event of an accident. While dose rates to operators is expected to be lower when the RCS is < 350°F, no current analyses

exist under these conditions. In addition, failures of the waste gas decay tanks can still occur below 350°F which also require control room isolation. Therefore, the MODE of Applicability was revised to provide consistency within the specifications and the accident analyses. This is a Ginna TS Category (iv.a) change.

[CTS13.xx-M1]:
1. It is acceptable to change the Applicability. With the removal of the brackets to MODES 5 and 6 in the proposed ITS, this is now "At all times." Why not use this phrase for clarity?
2. Why is TS 3.5.6 not provided in this Chapter 3.7 submittal?
Status:[ ] Open
Discussion:

xxi. TS 3.3.5.2 - This was revised to provide requirements for an inoperable filtration train and inoperable dampers. The CREATS dampers isolate the control room in the event of a radiological event while the filtration train filters the control room atmosphere following isolation. The new specification continues to allow the filtration train to be inoperable for 48 hours before requiring a shutdown or placing the control room in the emergency radiation mode (i.e., CREATS Mode 6). If one of the two redundant dampers in each outside air flow path is inoperable, the new specifications allow 7 days to restore the damper to OPERABLE status similar to restoring one train of redundant CREFS in NUREG-1431. If both dampers are inoperable, the plant must enter LCO 3.0.3 since the control room can no longer be isolated. If both dampers are lost in MODES 5 or 6, or during fuel movement, then fuel movement and CORE ALTERATIONS must be suspended immediately. These changes provide consistency with the accident analyses and NUREG-1431. These are Ginna TS Category (v.a) changes.

[CTS13.xxi-L1 or L2]:
1. The proposed LCO for CREATS separates the portion of the filtration train from the CREAT System. This is not in the existing TS, so please explain.
2. The sketch of CREATS requested earlier is needed to complete this evaluation.
Status:[ ] Open
Discussion:

14. Technical Specification 3.4

i. TS 3.4.1 - This was revised to specifically require that all MSSVs be tested prior to entering MODE 2 versus the current wording which allows the MSSVs to be removed for testing at any time. This change is consistent with current operating practices and ensures that the MSSVs are OPERABLE before the reactor goes critical but allows the MSSVs to be tested under hot conditions (i.e., ≥ 350°F). In addition, the MSSV setpoints were added to the new specification since these are assumptions within the accident analyses. These are Ginna TS Category (v.a) changes.

[CTS14.i-L1]:
1. The category v.a should be further explained to better explain the existing TS which is too ambiguous and the existing TS does not have the exact wording as is implied in the above justification. It is clear that the existing TS exempts MSSVs from being available during testing. It could be interpreted that the test is performed only when a parameter is met and that is "with the RCS temperature at or above 350°F". The most logical interpretation is that the availability of all eight MSSVs only applies "with the RCS temperature at or above 350°F". Based upon this last interpretation, the change requested is less restrictive because RCS temperature is no longer at or near 350°F but can be as high as 540°F just prior to entry into MODE 2.
2. In existing TS 3.4.1, explain the modifying phrase "turbine cycle code approved steam relieving capability" added to the "eight MSSVs being available". Does this have any technical significance? Is it in lieu of just saying an "ASME code safety valve"?
Status:[ ] Open
Discussion:

ii. TS 3.4.2.1.b - This was revised to be consistent with the accident analysis assumptions as discussed in the new bases. Essentially, the accident analyses treat the preferred AFW System as four trains (i.e., two motor driven trains and two turbine driven trains) such that each SG receives flow from two AFW trains. Therefore, the failure of both motor driven trains or the turbine driven train (or both flowpaths) has the same consequence (i.e., loss of one train to each SG). Since the turbine driven train is allowed to be inoperable for up to 72 hours per TS 3.4.2.2.a (and NUREG-1431), this specification was revised to allow both motor driven AFW pumps to be inoperable for up to 72 hours. In addition, if both AFW trains to a common SG are inoperable, the new specifications allow 4 hours to restore at least one train before requiring a controlled cooldown. A time limit for

being in this configuration is necessary since no AFW would be available in the event of a HELB which affects the only SG able to receive AFW. Requiring an immediate cooldown in this configuration is not considered prudent since AFW provides for decay heat removal in lower MODES. These are Ginna TS Category (v.b.14) and (v.a) changes, respectively.

[CTS14.ii-L1]:
This appears acceptable for two MDAFW pumps to be inoperable for 72 hours; however, this is pending the final resolution of the agreed upon format for the LCO(s) for AFW and SAFW.
Status:[ ] Open
Discussion:

[CTS14.ii-L2]:
1. This is for the new proposed Condition E which is on hold pending the final resolution of the agreed upon format for the LCO(s) for AFW and SAFW.
2. This is a relaxation, not a more restrictive change; so, provide justification accordingly.
3. In order to enter this new Condition E, shouldn't there be a verification that both trains of SAFW are OPERABLE?
Status:[ ] Open
Discussion:

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iii. TS 3.4.2.3 - This was revised to require that the SAFW cross-tie be available when the SAFW System is required to be OPERABLE. This change is required since the accident analyses credit the use of the cross-tie for HELBs with a failure of one SAFW pump. Each cross-tie motor operated valve is considered part of the SAFW train which shares the same electrical power source. This is a Ginna Station TS Category (v.a) change.

[CTS14.iii-L1]:
1. This appears to be a less restrictive change. Provide the identification of the set of cross-tie valves to which this change applies.
2. A unique SR will be required to verify periodically these specific valves are assured to be opened.
3. Are there any pressure isolation concerns if these valves remain open in the SAFW during all expected operation modes?
4. Are the electrical and mechanical train divisions uniform without any of the SW System pumps combinations to be concerned about.
Status:[ ] Open
Discussion:

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iv. TS 3.4.3 - The requirement for SW suction for the AFW and SAFW pumps were relocated to the LCO for these pumps. The CSTs provide the preferred source of condensate to the preferred AFW pumps while the SW System is the safety related source for both the preferred and standby AFW systems. The relocation of the need for a SW supply to the AFW pumps within technical specifications does not reduce the requirement. Instead, the change provides consistency within the new specifications and is easier for licensed personnel to understand. This is a Ginna TS Category (i) change.

[CTS14.iv-RI1]:
Clarify what was relocated to where? For SAFW, is this Action b of TS 3.4.3 being transferred to where in LCO 3.7.5? It is not clear what is stated above for the relocation for AFW. Please explain.
Status:[ ] Open
Discussion:

v. TS 3.4.3 - This was revised to require that a backup source of condensate be verified within 4 hours when the CSTs are inoperable versus demonstrating the operability of the SW System. Specifying a time limit for verifying the backup condensate source is a conservative change which now provides a clear and concise requirement for plant operators. Revising the Actions to allow any alternate source to be used as a backup source provides additional operational flexibility since other condensate sources than the SW System can be used if necessary. These sources are described in the bases for new LCO 3.7.6. These changes are consistent with NUREG-1431 and are Ginna TS Category (v.a) changes.

[CTS14.v-L1]:
1. This is a relaxation to provide an alternate course of action before declaring a component inoperable. Provide justification as such.
2. The questions on ITS81.ii need addressing and ITS81.iv needs the reverification proposed to be deleted and not justified above.
Status:[ ] Open
Discussion:

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21. Technical Specification 3.11

i. TS 3.11.1 - This was revised to require that the Auxiliary Building Ventilation System (ABVS) be OPERABLE when one or more fuel assemblies in the Auxiliary Building has decayed < 60 days since being irradiated. The specific components which are required for the ABVS to be considered OPERABLE were relocated to the bases similar with the structure of NUREG-1431 and the ITS Writer's Guide. The bases for LCO 3.7.10 now require that one of the two 100% capacity Auxiliary Building main exhaust fans, exhaust fan C, the SFP Charcoal Absorber System, and all associated ductwork, valves and dampers be OPERABLE. In addition, TS 3.11.1.c was revised to require a negative pressure within the Auxiliary Building operating floor with respect to the outside environment instead of requiring all doors, windows, and other direct openings between the operating floor area and the outside to be closed. This change provides consistency with assumptions of the fuel handling accident as described in the bases. This change also provides a much clearer specification which is easier for licensed personnel to read and understand without any reduction in actual requirements. These are Ginna TS Category (i) and (v.a) changes, respectively.

[CTS21.i-RI1]:
1. It appears that after irradiated fuel has decayed more than 60 days, ABVS and all components are turned off. This was not the assumption of the improved TS per NUREG-1431. If irradiated fuel is handled after 60 days and a FHA occurs explain the need for the LCO?

2. It is acceptable to relocate OPERABILITY requirements to the BASES.

3. The operability requirements of existing TS 3.11.1.a thru e will be verified after the sketches of the system are received as requested in ITS88.ii, Item 1.
Status:[ ] Open
Discussion:

[CTS21.i-M1]:
It is acceptable to require a negative pressure verification in lieu of verifying doors, dampers, and etc, are closed. Where is this placed in the LCO? As noted earlier in ITS88, a Surveillance Requirement(s) is needed.
Status:[ ] Open
Discussion:

ii. TS 3.11.2 - The requirement to continuously monitor radiation levels in the SFP area was not added to the new specifications. No screening criteria apply for this requirement because the process variable of the LCO is not an initial condition of a DBA or transient analysis. Further, the SFP radiation levels only provide a backup source to a SFP problem. Other LCOs provide adequate

verification of SFP primary indications (i.e., level and boron concentration) which ensure that all accident analysis assumptions are met. Since a fuel handling accident can only occur as a result of fuel movement, personnel would be stationed within the Auxiliary Building and immediately aware of a problem. Therefore, the requirement specified for this function does not satisfy the NRC Final Policy Statement technical specification screening criteria and is relocated to the TRM. This is a Ginna TS Category (iii) change.

[CTS21.ii-R01]:
Which radiation monitors are involved here? Are they are on the plant vent, main auxiliary building exhaust fans or local area monitors?
Status:[ ] Open
Discussion:

iii. TS 3.11.3 and 3.11.5 - The heavy load restriction for movement of loads over the SFP was not added to the new specifications. No screening criteria apply for this requirement because the heavy load limit of this LCO is not an initial condition of a DBA or transient analysis. The requirement specified for this function does not satisfy the NRC Final Policy Statement technical specification screening criteria and is relocated to the TRM. This change is consistent with WCAP-11618 (Ref. 52) and is a Ginna TS Category (iii) change.

[CTS21.iii-R02]:
This appears acceptable; but, what is the topic of the WCAP-11618 and the consistency noted here.
Status:[ ] Open
Discussion:

iv. TS 3.11.4 - The SFP water temperature limit was not added to the new specifications. No screening criteria apply for this requirement because the SFP water temperature limit of this LCO is not an initial condition of a DBA or transient analysis. The requirement specified for this function does not satisfy the NRC Final Policy Statement technical specification screening criteria and is relocated to the TRM. This is a Ginna TS Category (iii) change.

[CTS21.iv-R01]:
1. Please provide a copy of Ginna's screening criteria for this existing TS requirement.
2. ITS92.ii, item 3, is related to this existing TS requirement. There appears to be an analysis which assumes the initial SFP temperature to be first 120°F and then 150°F because at 180°F the structural integrity of the fuel pool is not maintained as noted in UFSAR Section 9.1.3.1.
Status:[ ] Open
Discussion:

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28. Technical Specification 4.1

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ii. The following changes were made to TS 4.1.2 or Table 4.1-2:

a. Table 4.1-2, #6a was revised to extend the

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g. Table 4.1-2, Functional Unit #17 was revised to only require verification of SFP boron concentration once every 31 days when fuel is stored in the SFP and the position of fuel assemblies which were moved in the SFP have not been verified. The current monthly requirement (regardless of the status of the SFP verification) is not reflected in the fuel handling accident analysis which does not credit the availability of soluble boron. This is a Ginna TS Category (v.b.32) change.

[CTS28.ii.g-L1]:
It is unclear to us what is the boron concentration limit for the SFP. UFSAR Section 9.1.2.2.1 states SFP is maintained at least at a 2000 ppm concentration. Appendix F in the proposed COLR says equal to or greater than 300 ppm. The above justification assumes no soluble boron as does existing TS 5.4.2. Existing TS 5.4.6 says SFP concentration matches that in the reactor cavity. Justify why this limit can this be placed in the COLR.
Status:[ ] Open
Discussion:

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i. The following new requirements were added to Table 4.1-2 (Ginna TS Category (iv.a) changes):

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12. SR 3.7.11.1 - requires verification every 31 days that ≥ 23 feet of water is available above the top of the irradiated fuel assemblies seated in the storage racks during fuel movement in the SFP. This verification is required since the fuel handling accident assumes that at least 23 feet of water is available with respect to iodine releases.

[CTS28.ii.i.17-M1]:
It is acceptable to add this SR pending resolution of issues identified in ITS90.iii.

13. SR 3.7.13.1 and SR 3.7.13.2 - verification prior to fuel movement in the SFP that the associated fuel assembly meets the necessary requirements for storage in the intended region (e.g, enrichment limit, burnable poisons present). This verification is required to limit the amount of time that a fuel assembly could be misloaded in the SFP.

[CTS28.ii.i.13-M1]:
It is acceptable to add these SRs pending resolution of issues identified in ITS92.ii.

14. SR 3.7.6.1 - requires verification every 12 hours that the CST volume is ≥ 22,500 gallons. This ensures that the minimum volume of condensate is available for the preferred AFW System following an accident.

[CTS28.ii.i.14-M1]:
It is acceptable to add this SR pending resolution of issues identified in ITS81.ii.

15. SR 3.7.7.1 - requires verification every 31 days that each CCW manual and power operated valve in the CCW pump train or loop header flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position. This Surveillance ensures that the CCW System is capable of performing its function following a DBA to provide cooling water to safety related components.

[CTS28.ii.i.15-M1]:
It is acceptable to add this SR pending resolution of issues identified in ITS82.iii.

16. SR 3.7.7.2 - requires performance of a complete cycle of each CCW motor operated isolation valve to the RHR heat exchangers in accordance with the IST Program. This ensures that the normally closed motor operated valves are capable of being opened following a DBA.

[CTS28.ii.i.16-M1]:
It is acceptable to add this SR pending resolution of issues identified in ITS82.iii.

17. SR 3.7.8.1 - requires verification every 31 days that each SW manual and power operated valve in the SW pump train or loop header flow path, that is not locked, sealed, or otherwise secured in position, is in the correct position. This Surveillance ensures that the SW System is capable of performing its function following a DBA to provide cooling water to safety related components.

[CTS28.ii.i.17-M1]:
It is acceptable to add this SR pending resolution of issues identified in ITS83.v.

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m. Table 4.1-2, Functional Unit #12 - This was relocated to the TRM since it does not meet any of the requirements for inclusion in the ITS. This is a Ginna TS Category (iii) change.

[CTS28.ii.m-R01]:
It is agreed this functional unit does not meet Tech Spec criteria for inclusion; however, has Ginna complied with the requirements of Generic Letter 86-10? Has the Fire Protection program been reviewed and approved by the NRC staff? After acceptance then the elements of the fire Protection Program can be relocated.
Status:[ ] Open
Discussion:

n. Table 4.1-2, Functional Unit #8 - The Frequency for determining gross specific activity of the secondary system was revised from once every 72 hours to once every 31 days. In addition, the determination of I-131 was also changed to once every 31 days independent of the last activity level since the current Ginna TS allow up to 6 months between tests. These changes are all consistent with NUREG-1431. This is a Ginna TS Category (v.c) change.

[CTS28.ii.n-L1]:
1. The proposed SR for a specific isotopic analysis every 31 days is acceptable and this is a technically equivalent to the note (3) of the table.
2. The SR for determining gross specific activity is not in Proposed ITS LCO 3.7.14. The elimination of the more frequent gross activity test every 72 hours has not been justified as a less restrictive change to the existing TS. Please provide this justification.
Status:[ ] Open
Discussion:

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32. Technical Specification 4.5

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xii. TS 4.5.2.3.9 - This was revised to require a test of the automatic actuation capability of the CREATS once every 24 months. This verification is necessary to ensure that the control room environment can be isolated in the event of a radiological release. This is a Ginna TS Category (iv.a) change.

[CTS32.xii-M1]
Please verify that the existing TS 4.5.2.3.9 was retained as is and this should state that "A new SR was added to test the automatic actuation capability of CREATS at refueling."
Status:[ ] Open
Discussion:

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34. Technical Specification 4.7

i. TS 4.7 was revised to include a surveillance to ensure that each MSIV can close on an actual or simulated actuation signal every 24 months consistent with NUREG-1431 and current Ginna Station TS Table 3.5-2 which require that the isolation signals to the MSIVs be OPERABLE. In addition, Required Actions were provided in the event that the MSIVs cannot close as required by this Surveillance. These actions require restoration of, or closure of an inoperable MSIV, within 24 hours. In the event that both MSIVs are inoperable, the plant must enter LCO 3.0.3. Finally, requirements for the main steam non-return check valves were added. These are Ginna TS Category (iv.a) changes. The test to ensure that each MSIV can close on an actual or simulated actuation signal every refueling outage is judged as technically equivalent and not more restrictive.

[CTS34.i-M1]:
The existing TS 4.7 appears to have been clarified rather than revised in a more restrictive manner. Since no LCO existed, Applicability was added. Proposed SR 3.7.2.3 is the same as "The MSIVs shall be tested at least each refueling outage".
Status:[ ] Open
Discussion:

[CTS34.i-L1]:
The existing TS 4.7, Main Steam Isolation Valves (MSIVs) covers only testing requirements and does not have a corresponding Limiting Condition of Operation for MSIVs. Table 3.5-2 required MSIV operability "as open above 350°F T_{avg}". The improved TS 3.7.2 was added to limit the operability of the MSIVs to just MODES 1, 2, and 3. New Conditions with less restrictive Required Actions were added to preclude an immediate shutdown if a MSIV became inoperable. Provide justifications for these relaxations.
Status:[ ] Open
Discussion:

[CTS34.i-L2]:
See questions concerning the addition of these new valves in ITS77.viii. The existing TS 4.7 was changed to add new Limiting Conditions of Operation for the "Non-Return Check Valves". The improved TS 3.7.2 was further modified to add new Conditions with less restrictive required actions to preclude an immediate shutdown if the main steam header is nonisolable with the Non-Return Check Valves becoming inoperable. Provide justifications for these relaxations.
Status:[ ] Open
Discussion:

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35. Technical Specification 4.8

    i. TS 4.8.1 and 4.8.2 - The Frequency of the AFW pump tests was changed from monthly to as defined in the Inservice Testing Program consistent with ASME, Section XI requirements. The acceptance criteria was also relocated to Inservice Testing Program consistent with NUREG-1431. This program provides sufficient control for these testing activities. In addition, all OPERABILITY requirements (e.g., required pump flowrates) were relocated to the LCO bases consistent with the ITS Writer's Guide. These are Ginna TS Category (iii) and (i) changes, respectively.

[CTS35.i-L1 and L2]:
1. This justification only deals with the relocation of test requirements. The relaxation for the test intervals in TS 4.8.1 and 4.8.2 have never been justified.
2. This is viewed as a major relaxation to the test frequency of the motor-driven and turbine-driven AFW pumps.
3. The issues of relocation will not be dealt with until this relaxation if first acceptable by the NRC technical staff.
Status:[ ] Open
Discussion:

ii. TS 4.8.3 - This Surveillance was revised to relocate the Frequency of testing the AFW suction and discharge valves to the Inservice Testing Program which provides sufficient control of these testing activities. In addition, the cross-over motor operated isolation valves were not added to the new specifications since these valves are not credited in the accident analyses (see bases for new LCO 3.7.5). These are Ginna TS Category (iii) and (v.b.39) changes, respectively.

[CTS35.ii-L1]:
1. There is no justification for changing the test intervals from monthly per TS 4.8.3 to in accordance with the IST Program. Please provide.
2. In ITS80.i and ITS80.iii, issues pertaining to this change need to be resolved concurrently.
3. The issues of relocation will not be dealt with until this relaxation if first accepted.
Status:[ ] Open
Discussion:

iii. TS 4.8.4 - The Frequency of the SAFW pump tests was changed from monthly to as defined in the Inservice Testing Program consistent with ASME, Section XI requirements. The acceptance criteria was also relocated to Inservice Testing Program consistent with NUREG-1431. This program provides sufficient control for these testing activities. In addition, all OPERABILITY requirements (e.g., required pump flowrates) were relocated to the LCO bases consistent with the ITS Writer's Guide. These are Ginna TS Category (iii) and (i) changes, respectively.

[CTS35.iii-L1]:
1. This justification only deals with the relocation of test requirements. The relaxation for the test interval in TS 4.8.4 has never been justified.
2. This is viewed as a major relaxation to the test frequency of the SAFW pumps.
3. The issues of relocation will be dealt with after this relaxation is accepted by the NRC technical staff.
Status:[ ] Open
Discussion:

iv. TS 4.8.5 - This Surveillance was revised to relocate the Frequency of testing the SAFW suction, discharge, and cross-over valves to the Inservice Testing Program which provides sufficient control of these testing activities consistent with NUREG-1431. This is a Ginna TS Category (iii) change.

[CTS35.iv-L1]:
1. There is no justification for changing the test intervals from monthly per TS 4.8.5 to in accordance with the IST Program. Please provide.
2. In ITS80.i and ITS80.iii, issues pertaining to this change need to be resolved concurrently.
3. The issues of relocation will not be dealt with until this relaxation if first accepted.
Status:[ ] Open
Discussion:

v. TS 4.8.6 - This was revised to relocate the acceptance criteria for the AFW and SAFW tests to the actual procedures performing these tests. The new bases identify what is required for OPERABILITY of the AFW and SAFW Systems such that specifying this acceptance criteria is unnecessary. In addition, both the bases and test procedures are controlled under 10 CFR 50.59. This is a Ginna TS Category (iii) change.

[CTS35.v-RI1]:
1. It is acceptable to relocate the details of these testing procedures to the BASES. Please identify where this is located.
2. The deleted text in the last sentence is not acceptable with this justification. This on hold pending the resolution of the issues in CTS35.i and CTS35.iii.
Status:[ ] Open
Discussion:

vi. TS 4.8 - A new Surveillance was added requiring verification every 31 days of the correct position of each AFW and SAFW manual, power operated and automatic valve in the flow path that is not locked, sealed or otherwise secured in position.

This verification is required to ensure that the AFW and SAFW Systems are OPERABLE when not in service. This is a Ginna TS Category (iv.a) change.

[CTS35.vi-M1]:
It is acceptable to add this new SR 3.7.5.1.

38. Technical Specification 4.11

iii. TS 4.11.1.1.d - This was not added to the new specifications since this verification is not required to ensure that initial assumptions of the accident analyses are still met. The SFP Charcoal Absorber System does not utilize heaters. The bases for SR 3.7.13.1 state that operating the ventilation system for ≥ 15 minutes every 31 days for systems without heaters is to ensure system operation. In accordance with new LCO 3.7.10 (NUREG-1431 LCO 3.7.13), the ABVS is required to be in operation during fuel movement within the Auxiliary Building. As such, the ABVS is not a standby system at Ginna Station (i.e., the system must be both OPERABLE and in operation during its MODE of Applicability). Therefore, a monthly verification provides no verification of any accident analysis assumption. Instead, a new Surveillance was added which requires verification every 24 hours that the Auxiliary Building operating floor level is at a negative pressure with respect to the outside environment. This verification is consistent with plant practices and ensures that an initial assumption of the fuel handling accident is being maintained. The change is also consistent with Reference 55. This is a Ginna TS Category (v.c) change.

[CTS38.iii-L1]:
1. Explain the filter bank justification. Performing the verification provides assurance the filter bank is operational if called upon to operate. While the ABVS is being operated, this SFP Charcoal Adsorber System appears capable of being put into a bypass or standby and never checked if it were not for existing TS 4.11.1.d.
2. Why are the Auxiliary Building Charcoal Filters not tested also?
Status:[ ] Open
Discussion:

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66. New Requirements (Ginna TS Category (iv.a) Changes)

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ii. LCO 3.7.3 and the associated surveillances were added for the MFW pump discharge valves (MFPDVs), MFW regulating valves, and the associated bypass valves. This new requirement specifies an isolation time of 80 seconds for the MFPDVs and 10 seconds for the remaining valves and requires them to be OPERABLE above MODE 4 to provide isolation capability as assumed in the accident analyses.

[CTS66.ii-M1]:
It is acceptable to add this LCO pending resolution of the issues raised in ITS78.

iii. LCO 3.7.4 and the associated surveillance were added for the atmospheric relief valves (ARVs). The LCO requires that the ARVs be OPERABLE when RCS average temperature is > 500°F in MODE 3 to provide cooldown capability following a SGTR event as assumed in the accident analyses. A Surveillance to verify that each ARV is capable of opening and closing once every 24 months was also added.

[CTS66.iii-M1]:
It is acceptable to add this LCO pending resolution of the issues raised in ITS79.

iv. A COLR was developed which contains the actual limits for LCOs associated with reactor physic parameters that may change with each refueling. To prevent the need to revise Technical Specifications for parameters which are calculated using NRC approved methodology, Generic Letter 88-16 (Ref. 56) allows these limits to be relocated from the technical specifications. A copy of the proposed Ginna Station COLR is provided in Attachment F. The following parameters were relocated to the COLR:

a. SHUTDOWN MARGIN
b. MODERATOR TEMPERATURE COEFFICIENT
c. Shutdown Bank Insertion Limit
d. Control Bank Insertion Limits
e. Heat Flux Hot Channel Factor
f. Nuclear Enthalpy Rise Hot Channel Factor

g. AXIAL FLUX DIFFERENCE
h. Overtemperature ΔT and Overpower ΔT Trip Setpoints
i. RCS Pressure, Temperature and Flow Departure from Nucleate Boiling (DNB) Limits
j. Accumulator Boron Concentration
k. RWST Boron Concentration
l. Spent Fuel Pool Boron Concentration
m. Refueling Boron Concentration

[CTS66.iv.1-L1]:
1. This is a relaxation for Spent Fuel Pool boron concentration which has not been justified as such here.
2. Also, the value to be in the COLR is still being discussed. Please see CTS28.ii.g and ITS91.ii.
Status:[ ] Open
Discussion:

Section 3.8 TS

3.8Q1 - The CTS 3.0.2 exclusion for the Operability of a system, subsystem, train, component, or device when one of its power sources is inoperable is carried over to ITS LCO 3.8.1. The justification for changing the allowable outage time from the current 1 hour to the proposed 12 hours is its consistency with NUREG-1431. This is not enough justification for this less restrictive change. Provide justification for this change based on plant-specific design capabilities.

3.8Q2 - The CTS 3.7.2.2.c time to reenergize safety-related 480-Vac buses 14, 16, 17, or 18 is 1 hour. The ITS LCO 3.8.9, Condition A, completion time is 8 hours to restore the AC electrical power distribution system to Operable status. The justification given, D.17.v, states that 8 hours is consistent with the ITS. It is not clear how consistency with the ITS makes this ITS completion time acceptable. Justify the proposed completion time based on plant-specific design capabilities.

3.8Q3 - The CTS 3.7.2.2.d time to achieve cold shutdown is 36 hours with both offsite sources inoperable. The ITS LCO 3.8.1, Condition D, Completion Time to attain Mode 5 (cold shutdown) is 36 hours from entering Condition D, that is, the Required Action and Completion Time of Condition A, no offsite power to one or more 480-Vac safeguards buses, is not met. Condition A, with two completion times (12 hours [if concurrent with inoperable redundant required safety features] and 72 hours to restore the offsite circuit to Operable status) results in a total time to achieve Mode 5 of 48 hours or 82 hours. This increase in the allowed time to reach cold shutdown was not justified. Discuss this change and provide justification appropriate to the change.

3.8Q4 - The CTS 3.7.2.2.f time to achieve cold shutdown is 36 hours with an inoperable inverter. The ITS LCO 3.8.1, Condition C, Completion Time to attain Mode 5 (cold shutdown) is 36 hours from the time Condition C is entered, that is, the Required Action and Completion Time of Condition A, one inverter inoperable, is not met. Condition A, with three completion times (2 hours, 24 hours, and 72 hours to restore the inverter) results in a total time to achieve Mode 5 of 38 hours, 60 hours, or 108 hours, respectively. This increase in the allowed time to reach cold shutdown was not justified. Discuss this change, the equivalency of the ITS Condition C Actions and Completion Times to the CTS 3.7.2.2.f ("OTHERWISE" implies a choice to immediately pursue cold shutdown) and provide justification appropriate to the change.

3.8Q5 - The CTS 3.7.2.2.g time to achieve cold shutdown is 36 hours with the constant voltage transformer inoperable. The ITS LCO 3.8.1, Condition B, Completion Time to attain Mode 5 (cold shutdown) is 36 hours from the time Condition B is entered, that is, the Required Action and Completion Time of Condition A, the constant voltage transformer becomes inoperable, is not met. Condition A, with two completion times (2 hours and 7 days to restore the transformer) results in a total time to achieve Mode 5 of 38 hours or 8-½ days; respectively. This increase in the allowed time to reach cold shutdown was not justified. Discuss this change, the equivalency of the ITS Condition B Actions and Completion Times to the CTS 3.7.2.2.g ("OTHERWISE" implies a choice to immediately pursue cold shutdown) and provide justification appropriate to the change.

3.8Q6 - The ITS changes the CTS 18-month interval for diesel generator inspection (4.6.1.e.1), diesel generator load rejection testing (4.6.1.e.2), and diesel generator simulated loss of power with concurrent safety injection testing (4.6.1.e.3) to a frequency of 24-months in the ITS. Give justification that shows the increase in this interval will not lower diesel generator performance and its ability to meet design requirements.

3.8Q7 - CTS 4.6.1.e.3(b) requires the diesel generator to operate "loaded with emergency loads" for ≥ 5 minutes. ITS SR 3.8.1.9 requires the diesel generator to operate for ≥ 5 minutes, with no specification on loading levels. Discuss the omission of specifying the loading of the diesel generator in this ITS Surveillance. Document the mechanism that controls the diesel generator loading for this test.

3.8Q8 - CTS 4.6.1.e.4, "This test may also serve to concurrently met the requirements of 4.6.1.a and b" (cold shutdown and refueling, and except for cold shutdown and refueling, respectively) is relocated to Note 1 of ITS SR 3.8.1.2, "Performance of SR 3.8.1.9 satisfies this SR." Discuss how this applies during cold shutdown and refueling, including ITS SR 3.8.2.1, "for AC sources required to be OPERABLE." Show the equivalence during cold shutdown and refueling. Discuss and justify any differences.

3.8Q9 - The CTS 4.6.2.c requirement to trend battery test data is deleted. Justification D.33.x states the trending is "performed to meet the frequency requirements of SR 3.8.6.2 and SR 3.8.4.3." Explain how the trending applies to these surveillances. Describe the trending program and its associated controls.

3.8Q10 - CTS 4.6.2.d requires a battery load (performance) test every 12 months with a possible extension of 3 additional months. ITS SR 3.8.4.2 requires a battery service test every 24 months. Explain the 'load' test and the 'service' test. Describe and justify any differences. Justify the extended interval between tests.

3.8Q11 - CTS 4.6.3.a.1 confirms nominal voltage on the high side of transformers 12A and 12B whereas ITS SR 3.8.1.1 confirms "indicated power availability for the offsite circuit to each of the 480 V safeguards buses." Explain how these surveillance requirements accomplish the same objective. Present justification for any differences.

3.8Q12 - CTS 4.6.3.a.2 verifies 4160-Vac circuit breaker position. Either 12AX or 12BX <u>AND</u> 12AY or 12BY must be open. The referenced ITS SR 3.8.1.1 states "verify correct breaker alignment." Describe and justify this relocation of requirements (the details of the breaker alignment). What are the controls on the relocated requirements?

3.8Q13 - CTS 4.6.3.a.3 verifies that tie breakers 52/BT16-14 and 52/BT17-18 are open when the RCS temperature > 200°F. The referenced ITS SR 3.8.9.1 confirms "correct breaker alignment." Describe and justify this relocation of requirements (the details of the breaker alignment and RCS temperature limit). What are the controls on the relocated requirements?

3.8Q14 - The completion time for LCO 3.8.3, Action A.1 is 48 hours in both the ITS and NUREG-1431. The basis is a 40-hour supply of diesel fuel and a 7-day supply of diesel fuel respectively. It is not apparent that the time is derived from the current Technical Specifications. Justify the *48-hour* completion time to restore a *40-hour* supply of diesel fuel. Note: The CTS Basis for 3.7.1 and 3.7.2, page 3.7-5, states "deliveries within 8 hours." Thus, it appears the completion time for Action A.1, to restore the fuel oil level to within limits, should be about 8 hours.

3.8Q15 - The Background Basis for ITS 3.8.4 states that DC distribution panels A are the normal dc supply for Train A (Buses 14 and 18 and diesel generator A) and the emergency dc supply for Train B (Buses 16 and 17 and diesel generator B) and that DC distribution panels B are the normal dc supply for Train B (Buses 16 and 17 and diesel generator B) and the emergency dc supply for Train A (Buses 14 and 18 and diesel generator A). Discuss how divisional independence is maintained and the surveillance that assures it.

3.8Q16 - ITS SR 3.8.4.3, battery capacity (performance discharge) test, has a frequency of 60 months (12 months or 24 months for certain conditions). There is also a note prohibiting this surveillance in Modes 1, 2, 3, and 4. It is noted that a 24-month refueling interval is proposed. When a 12 month frequency is required (degraded battery or the battery has reached 85% of expected life and < 100% rated capacity) and the plant is in Mode 1, describe the actions that result in the timely completion of this surveillance. Justify any deviations from the 12-month requirement. In a similar manner, discuss the 60-month interval imposed on the 24-month refueling cycle, that is, the outages to perform the test occur at 24 months, 48 months, and 72 months, and do not correspond to the 60-month interval specified. What is the RG&E method, means, and routine to complete this surveillance prior to 60 months?

3.8Q17 - Describe why the T. S. C. vital battery (shown in Figure B 3.8.4-1) does not need inclusion in LCO 3.8.4, Conditions, Actions, or Surveillance. Otherwise, why is it included in the Figure?

3.8Q18 - Figure B 3.8.4-1 shows 5 circuit breakers that are "normally open when T_{avg} > 200°F." Where is the associated surveillance that verifies the breaker alignment? If not located in LCO 3.8.4, DC Sources, why not? If controlled by LCO 3.8.9 and 3.8.10, describe why those controls are suitable in maintaining the independence of the sources.

3.8Q19 - Describe why the Specific Gravity limits of ITS Figure B 3.8.6-1 are different for Battery A and Battery B. Describe the validity of the limits presented in ITS Figure B 3.8.6-1.

3.8Q20 - ITS B 3.8.7 states that the loss of Instrument Bus *D* is addressed in LCO 3.3.2 and LCO 3.3.3. The basis for LCO 3.3.3 tells of the affected instrumentation and the need to declare them inoperable. However, neither LCO 3.3.2 nor LCO 3.3.3 direct actions on the loss of Instrument Bus D. Neither does LCO 3.8.7. Describe why this omission is acceptable.

Clarify whether the ITS is intended to cover three or four 120-Vac Instrument Buses. B 3.8.9, Background, states the "AC Instrument Bus electrical power distribution subsystem consists of four 120 VAC instrument buses." Thus, LCO 3.8.9, Condition B, includes Instrument Bus D. However, it is not clear whether LCO 3.8.7, Condition D, includes MCC B, the power source for Instrument Bus D. The ITS appears inconsistent on the application and use of 120-Vac Instrument Bus D. The scope of the Instrument Bus requirements should be consistent, that is, either include 120-Vac Instrument Bus D throughout or don't include it. This concern may require a telephone conference to clarify and resolve.

3.8Q21 - The ITS Basis for SR 3.8.9.1 and SR 3.8.10.1 list the requirements for the AC Instrument Bus power distribution subsystem as "between 113 VAC and 123 VAC." The "required voltage for the twinco panels

supplied by the 120 VAC instrument buses is between 115.6 VAC and 120.4 VAC," and is more restrictive than the limits on the instrument bus voltage. Describe the use of the twinco panels and justify why the technical specifications should limit the voltage maintained there to a value more restrictive than the voltage limits on the power source to the panels.

3.8Q18A The tie breakers for the ac and dc power systems that must be open in Modes 1, 2, 3, and 4 are specified in the Bases for LCO 3.8.9. Improved Technical Specification Surveillance Requirement 3.8.9.1 verifies these correct breaker alignments every 7 days. Of the five tie breakers shown in Figure B 3.8.4-1 that must be open, only the two tie breakers between 480-Vac Buses 14 and 16 are identified in the bases for LCO 3.8.9. The three tie breakers related to the Technical Support Center vital battery are not listed since the Technical Support Center vital battery cannot be credited as a battery source when in MODES 1, 2, 3, and 4. Detail why these tie breakers should not be verified open by technical specification in support of the independence required by Regulatory Guide 1.75?

3.8Q21A The ITS Basis for SR 3.8.9.1 and SR 3.8.10.1 list the requirements for the AC Instrument Bus power distribution subsystem as "between 113 VAC and 123 VAC." The "required voltage for the twinco panels supplied by the 120 VAC instrument buses is between 115.6 VAC and 120.4 VAC," and is more restrictive than the limits on the instrument bus voltage. The instrument buses supply power to the Twinco panels which in turn supply the safety-related instrument loops. Both the Twinco panels and instrument buses were purchased and installed with an allowed tolerance of ± 2% voltage. Due to instrument sensitivity concerns related to the loads supplied by the Twinco panels, these panels are limited to ± 2% of 118-Vac. By use of the ± 2% limit on the Twinco panels, that same limit is effectively on the ac instrument buses also. Shouldn't the Bases be changed to the Twinco ± 2% limit (or an offset ± 2% to account for voltage drop in the distribution system)?

3.8QA2 Supply the number of 'pilot' cells for the Category A measurements of SR 3.8.6.1. Supply the number of 'representative' cells for SR 3.8.6.3. What is the difference between 'pilot' cells and the 'representative' cells are determined, assigned and whether they remain as such throughout the life of the battery.

3.8QA1 Attachment A, Section C, Conversion of NUREG-1431-1431 to ITS, Item 94.vi, on ITS 3.8.1, notes that NUREG-1431 SR3.8.1.8 (ITS SR 3.8.1.6), SR 3.8.1.10 (ITS SR 3.8.1.7), and SR 3.8.1.13 (ITS SR 3.8.1.8) were revised to restrict performance of these SRs in Modes 3 and 4. The draft ITS SR 3.8.1.6 does not have that restriction on performing these SRs which would reduce the number of available ac sources and could cause perturbations to the electrical distribution system and challenge safety systems. Correct ITS SR 3.8.1.6 to include this restriction.

Section 3.9 Current TS

15. viii [CTS 15.viii-R1]
TS 3.5.5 and Table 3.5-5 - The requirements for radioactive effluent monitoring instrumentation which ensures that the limits of TS 3.9.1.1 and 3.9.2.1 are not exceeded were not added. No screening criteria apply for these requirements since the monitored parameters are not part of the primary success path in the mitigation of a DBA or transient. These monitors are not used for, nor capable or, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, respectively.

3.9 Q1 Explain how the ITS conform to the guidance of generic letter 89-01 to incorporate programmatic controls for radioactive effluents and radiological and environmental monitoring consistent with the requirements of 10 CFR Part 20, 40 CFR Part 190, and 10 CFR Part 50 Appendix I.

3.9 Q2 Submit any additional information required to meet the guidance of GL 89-01. Provide a markup of the CTS specifying which details of the CTS are to be relocated to the ODCM, effluent controls program, ITS specification 5.5.1 or ITS specification 5.5.4.

3.9 Q3 What is the method of control for approving changes to the effluent controls program after implementing ITS?

3.9 Q4 Clarify the meaning of the margin notation "shutdown purge and minipurge in Mode 6, others are addressed w/ Chapter 5.0" of page 3.5-2 as it related to discussion 15.viii]

16.x [CTS 16.x-A1/L1]
TS 3.6.1.b and TS 3.6.1.c - The requirement describing the specific applicability for containment integrity was not added. No screening criteria apply for this requirement since containment integrity is not assumed in the refueling safety analysis. The fuel handling accident inside containment analysis (UFSAR 15.7.3.3) takes no credit for isolation of the containment, containment integrity, nor effluent filtration prior to release. The requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the TRM. Boron concentration changes in MODE 6 and Required Actions to suspend positive reactivity additions is provided in new LCO 3.9.1. This is a Ginna TS Category (iii) change.

Assumptions of the evaluation of the fuel handling accident inside containment (Attachment A, Reference 49 p.3, para. 2) state that TS require that personnel and equipment doors are closed. Further,

the NUREG-1431 refueling operations containment penetrations LCO 3.9.4 satisfies criterion 3 of 10 CFR 50.36.

3.9 Q5 Current TS 3.6.1.b requires containment integrity with the vessel head removed unless boron concentration is greater than 2000 ppm. Discuss how TS 3.6.1.b requirements are provided in refueling ITS LCO 3.9.1. What part of TS 3.6.1.b is proposed to be relocated?

3.9 Q6 Current TS 3.6.1.c requires containment integrity and prohibits reactivity changes unless boron concentration limits are met. Discuss how TS 3.6.1.c requirements are provided in ITS LCO 3.9.1. What part of TS 3.6.1.c is proposed to be relocated? Discuss how containment integrity requirements of TS 3.6.1.c can be added to the LCO 3.9.4 or to a section 3.6 TS applicability since TS 3.6.1.c establishes limits related containment closure prior to boration to 2000 ppm.

18. Technical Specification 3.8

i. [18.i-XX]
TS 3.8.1.a and 3.8.3 - The requirements to close containment penetrations during fuel handling in the containment were not added. No screening criteria apply for these requirements since these conditions are not assumed in the refueling safety analysis. The fuel handling accident inside containment analysis (UFSAR 15.7.3.3) takes no credit for isolation of the containment nor effluent filtration prior to release from the containment building. Therefore, closure of containment penetrations during fuel handling inside containment is not required. The closure of the containment penetrations were established to provide additional margin for the fuel handling analysis and to provide protection against the potential consequences of seismic events during refueling. The dose consequences, however, of the fuel handling accident inside containment analysis is estimated at approximately 30% of 10 CFR 100 limits. This was found to be "well within" limits as documented in the NRC Safety Evaluation Report (SER) dated October 7, 1981 (Ref. 49). The requirements specified for these conditions do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the TRM. This is a Ginna TS Category (iii) change.

3.9 Q7 In the evaluation of the consequences fuel damaging accidents inside containment (SEP topic XV-20) dated October 7, 1981 the staff assumed that the plant TS require that personnel and equipment doors be closed and radiation levels be continuously monitored (page 3, paragraph 2). The assumptions of this evaluation continue to be valid. Provide a markup of NUREG LCOs 3.9.4, 3.9.5 and 3.9.6 and associated Bases pages with appropriate justifications showing incorporation of existing TS 3.8.1.a and 3.8.3.

ii. [18.ii-R1]
TS 3.8.1.b - The refueling or MODE 6 requirement for the containment radiation monitors which provide monitoring for personnel safety was not added. No screening criteria apply for this requirement because the process variable of the LCO is not an initial condition of a DBA or transient analysis. Further, the containment radiation monitors are a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirement specified for this function does not satisfy the NRC Final Policy Statement technical specification screening criteria and is relocated to procedures or other licensee controlled documents. This is a Ginna TS Category (iii) change.

3.9 Q8 Provide justification that the containment radiation monitors are not required to prevent the possibility of an abnormal situation or event giving rise to an immediate threat of the public health and safety.

iii. [18.iii-A1/M1]
TS 3.8.1.c - The requirement describing the specific applicability of the SRMs was revised. The phrase "whenever geometry is being changed" is covered by the new TS definition of MODE 6. *[A]* The requirement that one SRM be OPERABLE when core geometry "is not being changed" is covered by the Required Action *[3.9.3 RA A.1 and A.2]* for one inoperable SRM.*[A]* This would restrict CORE ALTERATION and positive reactivity additions when core geometry is not being changed. Required Actions *3.9.3 Conditions B and C]* were also provided when two SRMs become inoperable or when the audible indication is lost. *[M]* These new actions require verification of boron concentration every 12 hours and ensures the stabilized condition of the reactor core. These are a conservative revisions and Ginna TS Category (v.a) and (iv.a) changes, respectively.

3.9 Q9 Provide an explanation justifying the conclusion in 18.iii that the proposed ITS are more restrictive "technical" and more restrictive "additions" to the requirements in TS 3.8.1.c. Specifically identify these Ginna TS Categories for each proposed change. Justify each conclusion.

iv. [18.iv-A1/M1/L1]
TS 3.8.1.e - The requirement describing the specific applicability and frequency of the boron concentration sampling was revised. The phrase "immediately before reactor vessel head removal and while loading and unloading fuel from the reactor" is covered by the new TS definition of MODE 6.*[A1]* This would additionally require boron concentration sampling throughout MODE 6. *[M1]* The sampling frequency, however, was also revised *[from requiring boron sampling twice each shift]* to require sampling every 72 hours.*[L1]* These revisions consider the large volume of the refueling canal, RCS, and refueling cavity and are adequate to identify slow changes in boron concentration. Rapid changes in boron concentration, described in UFSAR 15.4.4.2, are detected by the SRM

instrumentation required by new TS 3.9.2. This is a conservative revision and a Ginna TS Category (iv.a) change.

3.9 Q10 Provide an explanation justifying the conclusion in 18.iv that the proposed ITS are more restrictive than the requirements in TS 3.8.1.e. Justify that the proposed changes are enhancements to the existing TS. Another proposed change addresses the applicability and frequency of boron sampling. State why there is not a significant safety question in the operation of the plant by changing the frequency of existing TS 3.8.1.e to 72 hours from twice each shift.

v. [18.v-R1]
TS 3.8.1.f - The requirement for communication with the control room during CORE ALTERATIONS is not added. No screening criteria apply for this requirement since communications is not part of the primary success path assumed in the mitigation of a DBA or transient. The requirement specified for this function does not satisfy the NRC Final Policy Statement technical specification screening criteria and is relocated to procedures or other licensee controlled documents. This is a Ginna TS Category (iii) change.

3.9 Q11 Specify the document to which the TS 3.8.1.f requirements will be relocated and the control mechanism that will be used for making future changes to the requirements.

vi. [18.vi-A1]
TS 3.8.1.d (footnote *) and TS 3.8.1.g (footnote *) - The requirement that either the preferred or the emergency power source may be inoperable for each residual heat removal loop is not added. This detail is encompassed in the definition of operability described in new TS 1.1 and the electric power requirements contained in Chapter 3.8. This is a Ginna TS Category (i) change.

vii. [18.vii-L1]
TS 3.8.1.c - The requirement to provide SRM audible indication in the containment was not added. No screening criteria apply for this requirement since the monitored parameter (audible indication in containment) is not assumed in the refueling safety analysis. The safety analysis assumes audible indication in the control room which is denoted by new LCO 3.9.2. The audible indication is for personnel safety only. Further, the audible indication is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirement specified for this function does not satisfy the NRC Final Policy Statement technical specification screening criteria and is relocated to procedures or other licensee controlled documents. This is a Ginna TS Category (iii) change.

3.9 Q12 Provide a safety justification for why audible indication of neutron flux in the containment is not part of channel operability for the monitors required to be operable by ITS 3.9.2.

3.9 Q13 Provide a safety justification for why continuous visual indication of neutron flux in the control room is not included as part of channel operability for the monitors required to be operable by ITS 3.9.2.

38. iv. [38.iv-L1]
TS 4.11.2.1 - This was revised to only require verification of RHR pump OPERABILITY once every 12 hours versus 4 hours consistent with SR 3.9.3.1. A Frequency of 12 hours is adequate due to the alarms and indications available to the operators with respect to RHR pump and loop performance. This is a Ginna TS Category (v.b.41) change.

3.9 Q14 This LCO verifies loop operability and pump operation. State why there is not a significant safety question in the operation of the plant in changing from 4 hours to 12 hours because of the installed control room alarms and indications.

v. [38.v-L2, M1]
TS 4.11.2.2 - This was revised to remove the requirement for an Inservice Test of the RHR pumps. An Inservice Test should not be required for an operating pump. *[L]* The status of a non-operating RHR pump is assured by new SR 3.9.4.2 which requires the verification of the breaker alignment and indicated power available to the pump. *[A]* The Inservice Testing program test is mainly performed to ensure adequate performance during accident conditions which far exceeds the requirements during normal conditions. This test is not necessary to ensure OPERABILITY during MODE 6 operations. This is a Ginna TS Category (v.b.42) change.

3.9 Q15 This LCO verifies pump operability. State why there is not a significant safety question in the operation of the plant in deleting the pump surveillance specified in 10 CFR 50.55a. Provide an administrative change discussion for adding SR 3.9.4.2. Justify that the proposed changes are enhancements to the existing TS.

vi. [38.vi-L3]
TS 4.11.3.1 - This was revised to only require a verification of the water level in the reactor cavity within 24 hours of fuel movement versus 2 hours. The new TS usage rules state that a SR is to be continuously performed at its required Frequency. However, the SR is only required to be performed when in the MODE of Applicability. Therefore, a SR with a Frequency of 24 hours must have been performed within 24 hours before entering the MODE of Applicability. A Frequency of 24 hours is acceptable due to the large volume of water available and the procedural controls in place. This is a Ginna TS Category (v.c) change.

3.9 Q16 This LCO verifies water level in the reactor cavity. State why there is not a significant safety question in the operation of the plant by changing the frequency of existing TS 4.11.3.1 to 24 hours from 2 hours in proposed SR 3.9.5.1.

Section 3.9 Improved TS

104. ITS 3.9.1

3.9 Q17 Refer to Bases markup for identification of editorial comments

i. Incorporation of approved Traveller BWOG-03, C.6.

ii. Incorporation of approved Traveller WOG-05, C.1. This traveller was modified to provide various wording changes to improve the readability and understanding of the bases. This is an ITS Category (iv) change.

iii. The LCO was revised consistent with similar LCOs. The details associated with the LCO were relocated to the bases. Including these details in the Bases eliminates ambiguities (e.g., when the plant initially enters MODE 6 and when RCS loops are isolated). This is an ITS Category (iii) change.

3.9 Q18 Explain the basis for concluding that the details of the systems in LCO 3.9.1 are not necessary to establish safety basis for systems requiring COLR boron concentration limits. Also, discuss what is meant by ambiguities in the justification. Is there any operational hardship associated with the ambiguity?

iv. The bases were revised as follows (these are ITS Category (iv) changes):

a. Various wording changes were made to improve the readability and understanding of the bases. This includes providing consistency with other bases sections.

3.9 Q19 Background discussion, page B 3.9-1
Provide replacement discussion applicable to Ginna.

3.9 Q20 Actions discussion introduction, page B 3.9-3.
STET the proposed deletion of the first sentence in the paragraph.

b. The plant-specific description of the boron dilution event during refueling was added.

c. Ginna Station was designed and built prior to the issuance of the GDC contained in 10 CFR 50, Appendix A. However, the draft GDC issued by the Atomic Industrial Forum (AIF) in 1967 were utilized in the design of Ginna Station. The bases were revised to reflect this difference.

3.9 Q21 Bases Insert 3.9.2.
This discussion provides high level design requirement information. Provide background discussion about system capability, i.e., the same level of detail you propose to delete.

d. The text was revised to clarify that normal cool down of the coolant volume for the purposes of temperature control is not considered as an addition of positive reactivity.

e. The text was revised to clarify that the sample taken is representative of the RCS, the refueling canal, and the refueling cavity. Only one sample is required since operation of the RHR assumes uniform mixing.

105. ITS 3.9.2

i. LCO 3.9.2, "Unborated Water Source Isolation Valves" and associated Bases, as presented in NUREG-1431, were not added and subsequent LCOs and Bases have been renumbered in consecutive order. Ginna Station has a plant specific safety analysis (UFSAR Section 15.4.4.2) for an uncontrolled boron dilution event during refueling assuming the worst case scenario with the maximum number of pumps and flow paths available. The conclusion of the analysis establishes that operators have sufficient time (i.e., greater than 30 minutes required by Section 15.4.6 of Reference 3.9.1) to mitigate the effects of a boron dilution event in MODE 6 prior to a loss of SHUTDOWN MARGIN. Therefore, the LCO for isolating unborated water sources in MODE 6 is not required. This is an ITS Category (i) change.

106. ITS 3.9.3

3.9 Q22 Review of the Actions Bases is pending response to LCO Q's.

3.9 Q23 Refer to Bases markup for identification of editorial comments

i. Incorporation of approved Traveller CEOG-02, C.3. This traveller was revised to delete the word "required" since there are only two independent source range channels. This is an ITS Category (iv) change.

ii. Incorporation of approved Traveller BWOG-03, C.6.

iii. The Completion Time for Required Action B.2 was revised to delete the 4 hour verification of the boron concentration limit since Ginna Station currently does not have this requirement. This requirement is performed when two source range neutron flux channels become inoperable. At the point in time when two source range channels become inoperable, the refueling boron concentration is assumed to be within limit. Verification that the boron concentration is within limit had been previously demonstrated by the periodic performance of SR 3.9.1.1. Since CORE ALTERATIONS and the addition of positive reactivity have been suspended (as a result of one inoperable source range channel), core reactivity conditions will remain stable. Therefore, the need to perform an additional verification within 4 hours is not necessary.

Confirmation that core reactivity remains stable will continue to be performed every 12 hours. This is an ITS Category (iii) change.

3.9 Q24 The intent of the 4 hour completion time to perform SR 3.9.1.1 is to confirm the assumption that the boron concentration is within required limits. WOG travelers are needed to start the generic change process. Is there an operational hardship associated with this SR?

iv. The Actions were revised to add a condition to address the loss of the audible count rate function. The audible count rate function is an initial assumption of the boron dilution during refueling event at Ginna Station. Audible count rate is provided by one of the two required OPERABLE source range neutron flux channels. The addition of the Actions is consistent with current Ginna Station TS 3.8.1.c. This is an ITS Category (ii) change.

v. The bases were revised as follows (these are ITS Category (iv) changes):

a. Various wording changes were made to improve the readability and understanding of the bases. This includes providing consistency with the LCO and other bases sections.

3.9 Q25 Insert 3.9.7.b, page B 3.9-10
The proposed addition to the SR 3.9.2.1 appears to be an operator note for application of SR 3.0.1 and the use and application section of the TS. Explain how the added text elucidates the basis for the required TS surveillance.

b. The text was revised to provide consistency with the LCO addressing the audible count rate function supplied from either of the OPERABLE source range channels.

c. Ginna Station was designed and built prior to the issuance of the GDC contained in 10 CFR 50, Appendix A. However, the draft GDC issued by the Atomic Industrial Forum (AIF) in 1967 were utilized in the design of Ginna Station. The bases were revised to reflect this difference.

d. The text was revised to clarify that normal cool down of the coolant volume for the purposes of temperature control is not considered as an addition of positive reactivity.

vi. Various wording changes were made to improve the readability and to reflect plant-specific nomenclature (e.g., replace "monitors" with "channels"). This is an ITS Category (iv) change.

3.9 Q26 Provide a design basis reason for replacing CTS requirements for monitor operability with ITS requirements for channel operability.

3.9 Q27 Delete the proposed reference to source range instrumentation in SR 3.9.2.2. This change is unnecessary to establish appropriate LCO SRs. Refer to Section 3.3 format and SR 3.0.1.

3.9 Q28 Acceptance of the 24 month channel calibration frequency is pending staff review.

vii. Two Required Actions, similar to those for Condition A with one inoperable source range flux channel, were added to Condition B to require immediate suspension of CORE ALTERATIONS and positive reactivity additions. These changes provide a human factors improvement since Required Actions A.1, A.2, and B.1 all have immediate Completion Times. Locating all these requirements into Condition B is easier for operations personnel to implement. This is an ITS Category (iii) change.

3.9 Q29 WOG travelers are needed to start the generic change process.

107. ITS 3.9.4

3.9 Q30 Provide plant specific LCO and Bases markup consistent with current TS requirements. Dose consequence calculations assume TS exist for personnel and equipment doors.

i. LCO 3.9.4, "Containment Penetrations" and associated Bases, as presented in NUREG-1431, were not added and subsequent LCOs and Bases have been renumbered in consecutive order. Ginna Station has a plant specific safety analysis (UFSAR Section 15.7.3.3) for a fuel handling accident inside containment which assumes no isolation of the containment and no filtration following the accident. The NRC has concluded that this analysis is "well within" 10 CFR 100 limits (Ref. 3.9.2). Since LCO 3.9.4 requirements only ensure fission product radioactivity release from containment due to a fuel handling accident during refueling are "well within" 10 CFR 100 limits (see Bases), these requirements were not added. This change is discussed in detail in section C.2 of this Attachment (item 18.i). As a result of the deletion of ITS 3.9.4, approved Travellers BWOG-03, C.3, BWOG-03, C.6, WOG-05, C.2, and WOG-05, C.3, were not incorporated. This is an ITS Category (i) change.

108. ITS 3.9.5

3.9 Q31 Refer to Bases markup for identification of editorial comments

i. Incorporation of approved Traveller BWOG-03, C.2.

ii. SR 3.9.5.1 was revised to remove the flow rate for the RHR loop in operation. For Ginna Station, the boron dilution event is the only event postulated to occur in MODE 6 which assumes the RHR system in operation. The Ginna Station safety analysis for boron dilution in MODE 6 (UFSAR Section 15.4.4.2) assumes uniform mixing of the

borated coolant as a result of a RHR pump being in operation and does not specify a given flow rate. Therefore, there is no analytical basis for the inclusion of a flow rate in the SR. The words "and circulating reactor coolant" were also deleted and relocated to the bases. This is an implied function for an RHR loop in operation and is consistent with the safety analysis and SR 3.4.8.1. This is an ITS Category (i) change.

3.9 Q32 The SR 3.9.5.1 Bases do not confirm the justification that RHR pump flow rate and reactor coolant circulation are not required to verify LCO compliance. Discuss this discrepancy, include discussion of the criteria for establishing pump operability. Generic changes to the NUREG require WOG travelers to start the change process.

iii. Incorporation of approved Traveller WOG-05, C.4.

iv. Required Action A.4 and associated bases were not added since Ginna Station TS currently do not contain this requirement. The ITS Required Action to "close all containment penetrations providing direct access from containment atmosphere to outside atmosphere" is based on the scenario that there are no RHR loops in operation. This could lead over a period of time to boiling of the coolant and, should water level not be maintained, eventually challenge the integrity of the fuel cladding, which is a fission product barrier. The closure of "all containment penetrations" is only provided to limit the release of radioactive gases to the atmosphere. Plant procedures and administrative controls were established at Ginna Station in response to Generic Letter 88-017 (Ref. 3.9.3). These procedures and administrative controls include (1) providing at least two adequate means of adding inventory to the RCS and (2) closing containment penetrations during reduced RCS inventory operation. These procedures and administrative controls were verified by the NRC to be adequately implemented (Ref. 3.9.4). Since previously approved controls are in-place to ensure radioactivity releases from challenges to the integrity of the fuel cladding, adding additional restrictions at a higher water level are not necessary. This is an ITS Category (i) change.

v. The bases were revised as follows (these are ITS Category (iv) changes):

a. Various wording changes were made to improve the readability and understanding of the bases. This includes providing consistency with other bases sections.

b. The bases was revised since there is no explicit analysis assumptions for the decay heat removal function of the RHR System in MODE 6. There is, however, an assumption in the boron dilution event that one RHR pump is in operation.

c. The bases was revised to clarify that while ultimately it may be possible to achieve criticality without the presence of mixing (e.g., thermal or boron stratification), the boron dilution analysis assumes the coolant remains a homogeneous mixture. Additionally, the bases was revised to eliminate the temperature indicating device since the definition of operability for the RHR loop would encompass this device.

vi. Various wording changes were made to improve the readability and understanding of the Required Action consistent with LCO 3.4.8.

vii. The title for LCO 3.9.5 was revised to be "RHR and Coolant Circulation - Water Level ≥ 23 ft" which is consistent with the Applicability, Ginna Station procedures, and all activities which relate to shutdown operations. This is an ITS Category (iv) change.

109. ITS 3.9.6

3.9 Q33 Refer to Bases markup for identification of editorial comments

i. Incorporation of approved Traveller BWOG-03, C.6.

ii. Incorporation of approved Traveller BWOG-03, C.2. This traveller was modified to provide various wording changes to improve the readability and understanding of the bases. This is an ITS Category (iv) change.

iii. Required Action B.3 and associated bases were not added since Ginna Station TS currently do not contain this requirement. The ITS Required Action to "close all containment penetrations providing direct access from containment atmosphere to outside atmosphere" is based on the scenario that there are no RHR loops in operation. This could lead over a period of time to boiling of the coolant and, should water level not be maintained, eventually challenge the integrity of the fuel cladding, which is a fission product barrier. The closure of "all containment penetrations" is only provided to limit the release of radioactive gases to the atmosphere. Plant procedures and administrative controls were established at Ginna Station in response to Generic Letter 88-017 (Ref. 3.9.3). These procedures and administrative controls include (1) providing at least two adequate means of adding inventory to the RCS and (2) closing containment penetrations during reduced RCS inventory operation. These procedures and administrative controls were verified by the NRC to be adequately implemented (Ref. 3.9.4). Since previously approved controls are in-place to ensure radioactivity releases from challenges to the integrity of the fuel cladding, adding additional restrictions at a higher water level are not necessary. This is an ITS Category (i) change.

iv. SR 3.9.6.1 was revised to remove the flow rate for the RHR loop in operation. For Ginna Station, the boron dilution event is the only

event postulated to occur in MODE 6 which assumes the RHR system in operation. The Ginna Station safety analysis for boron dilution in MODE 6 (UFSAR Section 15.4.4.2) assumes uniform mixing of the borated coolant as a result of a RHR pump being in operation and does not specify a given flow rate. Therefore, there is no analytical basis for the inclusion of a flow rate in the SR. The words "and circulating reactor coolant" were also deleted and relocated to the bases. This is an implied function for an RHR loop in operation and is consistent with the safety analysis and SR 3.4.8.1. This is an ITS Category (i) change.

3.9 Q34 The SR 3.9.6.1 Bases do not confirm the justification that RHR pump flow rate and reactor coolant circulation are not required to verify LCO compliance. Discuss this discrepancy, include discussion of the criteria for establishing pump operability. Generic changes to the NUREG require WOG travelers to start the change process.

v. The bases were revised as follows (these are ITS Category (iv) changes):

a. Various wording changes were made to improve the readability and understanding of the bases. This includes providing consistency with other bases sections.

b. The bases was revised since there is no explicit analysis assumptions for the decay heat removal function of the RHR System in MODE 6. There is, however, an assumption in the boron dilution event that one RHR pump is in operation.

c. The bases was revised to clarify that while ultimately it may be possible to achieve criticality without the presence of mixing (e.g., thermal or boron stratification), the boron dilution analysis assumes the coolant remains a homogeneous mixture. Additionally, the bases was revised to eliminate the temperature indicating device since the definition of operability for the RHR loop would encompass this device.

vi. Various wording changes were made to improve the readability and understanding of the Conditions and Required Actions consistent with LCO 3.4.8.

3.9 Q35 When current refueling TS 3.8.1.d, 3.8.1.g are not met TS action 3.8.2 requires refueling work to cease, repairs to be initiated, and prohibits any operations that may increase the reactivity of the core. TS 3.8.3 further requires that if no loop is in operation then in addition to TS 3.8.2 the shutdown purge and minipurge penetrations are to be isolated within 4 hours. Justify any less restrictive changes to these TS requirements that are proposed by the May submittal NUREG markup.

vii. The title for LCO 3.9.5 was revised to be "RHR and Coolant Circulation - Water Level < 23 ft" which is consistent with the Applicability, Ginna Station procedures, and all activities which relate to shutdown operations. This is an ITS Category (iv) change.

110. ITS 3.9.7

3.9 Q36 Refer to Bases markup for identification of editorial comments and requests for technical clarifications

i. Incorporation of approved Traveller BWOG-03, C.6.

ii. The bases were revised as follows (these are ITS Category (iv) changes):

a. Various wording changes were made to improve the readability and understanding of the bases. This includes providing consistency with other bases sections.

3.9 Q37 Where is the 100 hour fuel decay prior to fuel handling limit in the ITS?

b. The bases was revised to clarify that the fuel handling accident inside containment is "well within" the exposure guidelines of 10 CFR 100. This fractional release limit has been previously approved by the NRC (Ref. 3.9.2).

iii. The Applicability was revised to relocate the "during movement of irradiated fuel assemblies within containment" prior to "during CORE ALTERATIONS." The existing Applicability is very confusing with the exception to CORE ALTERATIONS provided. This human factors improvement is preferred by licensed personnel. This is an ITS Category (iv) change.

<u>Section 4.0 Current TS</u>

44.Technical Specification 5.1

i. TS 5.1.1, TS 5.1.2, and Figure 5.1-1 The description and figure of the site area boundary and exclusion area boundary was not added to the new specifications consistent with Traveller CEOG-03, C.1. Since the description of these design features does not satisfy the NRC Final Policy Statement technical specification screening criteria, this description is relocated to licensee controlled documents (i.e., UFSAR, Section 2.1.2). This is a Ginna TS Category (iii) change.

4.0 Q1 Improved TS justification 111.i states that traveler CEOG-03, C.1 was not incorporated. Explain the apparent conflict between justifications 44.i and 111.i.

4.0 Q2 Provide a discussion of change to justify deleting the site ownership statement in existing TS 5.1 and relocating the statement that [the accident analysis] assumptions are that the unrestricted area boundary coincides with the exclusion area boundary for evaluating radiological TS. The applicable regulation for design features TS is 10 CFR 50.36(c)(4).

4.0 Q3 The staff must be able to conclude that the improved TS support "adequate protection of the public health and safety" for evaluating radiological consequences related to 10 CFR Part 100 limits. To achieve this change in the ITS, retain the existing description of the site exclusion area by adding a one sentence description of the site exclusion area boundary to the ITS. The staff accepted: "The exclusion area boundary shall have a radius of _____ from the center line of the reactor" for recently issued BWR/6 plants conversion TS.

45. Technical Specification 5.2

i. TS 5.2 - The description of the containment design features was not added. Specific containment features are covered in the Technical Specification LCO's and, therefore, does not meet the criteria for Design Features described in 10 CFR 50.36(c)(4). Since the description of these design features does not satisfy the NRC Final Policy Statement technical specification screening criteria, this description is relocated to licensee controlled documents (i.e., UFSAR Sections 3.8.1 and 6.2). This is a Ginna TS Category (iii) change.

4.0 Q4 Specify the document each relocated item will be moved to and state the change control process governing future changes to that document.

46. Technical Specification 5.3

i. TS 5.3.1.a and TS 5.3.1.c - The description of the reactor core design features was revised consistent with the standard guideline of NUREG-1431. The section now includes the amount, kind, and source of nuclear material related to the reactor core. This is a Ginna TS Category (v.c) change.

4.0 Q5 Provide a discussion of change to justify deleting: (1) the approximate total mass of uranium dioxide pellets, (2) the use of Zircaloy-4, (3) the descriptions of the fuel rod positions in a fuel assembly, (4) reporting requirements regarding fuel assembly rod replacement limits per refueling, (5) fuel assembly design features regarding guide tubes, instrument thimbles, and array, and (6) RCC design parameters including control cladding consisting of silver-indium-cadmium in the design features TS section.

ii. TS 5.3.1.b - The description of the fuel storage design feature with respect to the maximum enrichment weight percent was revised and relocated to new Specification 4.3.1. The changes are in

accordance with the changes discussed in item 47.ii, below. These are Ginna TS Category (v.c) and (i) changes, respectively.

4.0 Q6 Provide a discussion of change to justify deleting the enrichment reload discussion in existing TS 5.3.1.b. Further, explain how the existing TS 5.3.1.b reload fuel enrichment discussion is related to ITS 4.3.1.2.a discussion on design features for new fuel storage racks.

iii. TS 5.3.2 - The description of the reactor coolant system (RCS) design features was not added. Specific RCS features are covered in the Technical Specification LCO's and, therefore, does not meet the criteria for Design Features described in 10 CFR 50.36(c)(4). Since the description of these design features does not satisfy the NRC Final Policy Statement technical specification screening criteria, this description is relocated to licensee controlled documents (i.e., UFSAR Section 3.7.1 and Chapter 5). This is a Ginna TS Category (iii) change.

iv. TS 5.3.1.b - This was revised to increase the fuel enrichment limit from 4.25 weight percent to 5.05 weight percent. This change has been evaluated and found to be acceptable with respect to postulated fuel handling accidents (Ref. 29). This is a Ginna TS Category (v.b.46) change.

4.0 Q7 Implementation of this proposed change requires a staff SER for the Westinghouse criticality analysis (Ref. 29). Provide a reference to the staff SE.

47. Technical Specification 5.4

i. TS 5.4.1, 5.4.2, 5.4.6, and Figures 5.4-1 and 5.4-2 - The description of the fuel storage design features denoting spent fuel storage regions and borated water concentrations was relocated to Chapters 3.7 and 3.9. These features are discussed in LCO, 3.7.11, LCO 3.7.12, LCO 3.7.13, and LCO 3.9.1 as appropriate. In addition, appropriate Required Actions were added in the event that SFP water level, boron concentration, or SFP region storage requirements are not met. This is a Ginna TS Category (i) change.

ii. TS 5.4.2 - The description of the fuel storage design features was revised. The revision to these features are based on a revised criticality analysis supporting the proposed 18 month fuel cycle (Reference 29). The description of these features follow the standard guideline of NUREG-1431 which would include the amount, kind, and source of special nuclear material with the exception that nominal center to center spacing between the fuel assemblies was not added. This is a Ginna TS Category (v.c) change.

4.0 Q8 Provide a discussion of change to justify deleting (1) that fuel is stored vertically, (2) fuel enrichments for unirradiated fuel assemblies delivered prior to January 1, 1984, and (3) references to unirradiated fuel assemblies delivered after January 1, 1984.

4.0 Q9 Implementation of proposed changes to fuel enrichments requires a staff SER for the Westinghouse criticality analysis (Ref. 29). Provide a reference to the staff SE.

iii. TS 5.4.3 - The description of the fuel storage design feature denoting the 60-day limit on storage of discharged fuel assemblies in Region 2 was not added. No screening criteria applies for the time limit on storage of discharged fuel assemblies in Region 2. The current 60-day limit was established to provide sufficient margin in spent fuel pool temperature calculations as a result of decay heat loads in Region 2 from discharged fuel assemblies (Reference 39). Although the spent fuel pool cooling system and, thus, the associated restriction on heat load prevent structural integrity damage to the spent fuel pool, they are not assumed to function to mitigate the consequences of a design basis accident (DBA). The restriction on heat load is not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. The restriction on heat load is a non-significant risk contributor to core damage frequency and offsite doses. Since no NRC Final Policy Statement technical specification screening criteria apply, this requirement is relocated to the TRM. This is a Ginna TS Category (iii) change.

4.0 Q10 All proposed TS 5.4.3 changes were not discussed in justification 47.iii. Provide a markup of all proposed changes with appropriate justification.

iv. TS 5.4.4 and 5.4.5 - These were revised consistent with References 29 and 39 to provide the amount, kind, and source of material which is stored in the canisters. TS 5.4.4.b and 5.4.5 were not added the new specifications for the reasons discussed in item 47.iii above. These are Ginna TS Category (v.c) and (iii), respectively.

4.0 Q11 Show how each commitment in TS 5.4.5 and TS 5.4.4.b will be maintained in the improved TS 4.3.1.1. Explain why proposed changes discussed in this justification are administrative changes.

v. TS 5.4 - This was revised to include descriptions of the SFP drainage system and capacity. This information is currently contained in the bases for this section. Since NUREG-1431, Chapter 4 does not contain any bases, this information has been relocated to the specification. This is a Ginna TS Category (i) change.

4.0 Q12 The proposed revisions are not clearly marked. Provide legible copies of current TS pages 5.4-2, 5.4-3 and 5.4-4 and identify and justify all proposed changes.

48. Technical Specification 5.5

i. TS 5.5 - The description of the waste treatment systems design features was not added. No screening criteria apply for the description of these features. Specific waste treatment systems features are either covered in the Technical Specification LCO's or have been relocated to other licensee controlled documents and, therefore, do not meet the criteria for Design Features described

in 10 CFR 50.36(c)(4). Since the description of these design features does not satisfy the NRC Final Policy Statement technical specification screening criteria, this description is relocated to licensee controlled documents (i.e., UFSAR Chapter 11). This is a Ginna TS Category (iii) change.

Section 4.0 Improved TS

111. ITS 4.1

i. Incorporation of approved Traveller CEOG-03, C.1 (Rev.1) was not incorporated since this does not apply to Ginna Station.

ii. A typographical or minor clarification is identified. This is an ITS Category (iii) change.

112. ITS 4.2

i. Approved Traveller NRC-01, C.1 was not incorporated since this does not apply to Ginna Station.

4.0 Q13 Explain why the traveler does not apply to Ginna.

ii. The control rod assembly material description was not added to the specifications since the specification already requires NRC approval of this material. Therefore, any change in material would require both a TS change and NRC approval. This is a ITS Category (i) change.

4.0 Q14 These generic changes require a staff approved traveler.

113. ITS 4.3

i. ITS 4.3.1.1.c and 4.3.1.1.d were not added to the new specifications since these items are not currently in the Ginna Station Technical Specifications. The spacing of fuel assemblies in the SFP is ultimately controlled by ITS 4.3.1.1.a and 4.3.1.1.b which state that the spent fuel storage racks are designed to limit $k_{eff} \leq 0.95$ assuming the pool contains fuel assemblies with 5.05 weight percent U-235 enrichment and is fully flooded with unborated water. This is an ITS Category (i) change.

4.0 Q15 Explain the design or regulatory burden basis for not wanting to upgrade ITS to these design parameters?

ii. ITS 4.3.1.1.e and 4.3.1.1.f were not added to the new specifications since these items are controlled by new ITS 3.7.17. The revised ITS 3.7.17 provides limits on the storage of fuel in the two SFP regions with appropriate action statements such that TS 4.3.1.e and 4.3.1.f are no longer required. Consequently, approved Traveller NRC-06, C.1 (Rev. 1) was also not added. This is an ITS Category (i) change.

4.0 Q16 Give the design or regulatory burden basis for not wanting to upgrade ITS to these design parameters?

[CTS 113.iii-M]

iii. The use of consolidated rod storage canisters was added to the new specifications consistent with current Ginna Station TS 5.4.4 and References 29 and 39.

4.0 Q17 Many of the details from TS 5.4.4 were not incorporated into insert 4.3.1.c. Other TS requirements not in TS 5.4.4 were included in insert 4.3.1.c. Provide a more detailed markup of TS 5.4.4 showing how the current license requirements are proposed to be changed upon implementation of improved TS and explain the basis for each change.

4.0 Q18 Give the basis for including canister operability requirements (i.e., insert 4.3.1.c reference to specification 3.7.17) in design features TS.

4.0 Q18 Reference 39 increases spent fuel storage capacity to 1016 assemblies from 595. How is this related to the justification for canister operability limits?

iv. ITS 4.3.1.2.d was not added to the new specifications since this is not currently in the Ginna Station Technical Specifications. The spacing of fuel assemblies in the new fuel pool is ultimately controlled by ITS 4.3.1.2.a and 4.3.1.2.b which state that the new fuel storage racks are designed to limit $k_{eff} \leq 0.95$ assuming the pool contains fuel assemblies with 5.05 weight percent U-235 enrichment and is fully flooded with unborated water. This is an ITS Category (i) change.

4.0 Q18 Give the design or regulatory burden basis for not wanting to upgrade ITS to these design parameters?

v. The description of the new fuel storage racks was clarified to state that the description applied to the "dry" racks consistent with Reference 29. This is an ITS Category (iv) change.

4.0 Q19 The markup provides the terminology "new fuel storage dry racks." Is this correct?

vi. ITS 4.3.2 was revised to reflect Ginna Station nomenclature and to provide clarification. These are ITS Category (iv) changes.

4.0 Q20 How is "<23 feet above the top of the fuel assemblies" verified by plant procedures to be met?

vii. ITS 4.3.3 was revised to reflect Ginna Station nomenclature. This is a ITS Category (iv) change. It is noted that the value specified for the SFP capacity is a theoretical value based on the exclusive use of consolidated fuel canisters (i.e., no fuel assemblies). The current SFP is limited to 1016 fuel assemblies due to limitations of the SFP Cooling System (see the bases for current Ginna Station TS 5.4). Since the heat removal capability of the SFP Cooling System does not meet the criteria of the NRC

Policy Statement, the new specification was based on the theoretical value.

4.0 Q21 In the current TS the spent fuel capacities are identified specifically for region I and region II. Provide a basis for changing this designation.

Section 6.0 Current TS

CTS Changes

1.xiii. TS 1.13 - The definition for Offsite Dose Calculation Manual (ODCM) was not added to the new specifications since it is no longer required. *[L]* The ODCM is described in new Specification 5.5.1. This is a Ginna TS Category (v.c) change.

15.viii. *3.5.5 Radioactive Effluent Monitoring Instrumentation [RETS]*

Existing TS 3.5.5, and Table 3.5-5 *procedural requirements addressing limiting conditions for operation, their applicability, remedial actions, and reporting requirements* for establishing radioactive effluent monitoring instrumentation operability to ensure that the limits of existing TS 3.9.1.1 - liquid effluent concentrations in the circulating water discharge and existing TS 3.9.2.1 - gaseous wastes instantaneous dose rates as calculated in the ODCM are not exceeded are not assumed in the accident analysis and are relocated to ODCM and the Effluent Controls Program described in improved TSs 5.5.1 and 5.5.4. No screening criteria apply for these requirements since the monitored parameters are not part of the primary success path in the mitigation of a DBA or transient. These monitors are not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, *[R,T]* respectively.

6.0Q1 For current TS requirements show which programmatic controls and procedural details of TS 3.5.5 and Table 3.5-5 are included in the proposed ODCM Program (specification 5.5.1) and radioactive Effluents Controls Program TS (specification 5.5.4) and which of these TS will be maintained outside the TS. Confirm that all NRC guidance in Generic Letter 89-01 for removal of these TS to administrative control TS programs has been met.

19. Technical Specification 3.9 - *Plant Effluents [RETS]*

6.0Q2 For current TS requirements show which programmatic controls and procedural details of TS 3.9 are included in the proposed ODCM program and Radioactive Effluents Controls Program TS and which of these details will be maintained outside the TS. *[R,T]*

i. Existing TS 3.9.1.1 requirements for radioactive material released in liquid effluents of the circulating water discharge to unrestricted areas which are limited to the concentrations specified in 10 CFR Part 20, Appendix B, Table II, Column 2, were not added. No screening criteria apply for these requirements because the process variable of the LCO is not an initial condition of a DBA or transient analysis. Further, liquid releases during normal operation are a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radioactive Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, *[R,T]* respectively. This is a Ginna TS Category (iii) change.

ii. Existing TS 3.9.1.2 and existing TS 3.9.2.4 requirements for dose or dose commitment to individuals which results from cumulative liquid effluent discharges during normal operation over extended periods and is intended to assure compliance with the dose objectives of 10 CFR Part 50, Appendix I, were not added. These limits are not related to protection of the public from any DBA or transient analysis. Further, radioactive liquid effluent dose projected value is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radiological Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, *[R,T]* respectively. This is a Ginna TS Category (iii) change.

iii. Existing TS 3.9.1.3 requirements for the liquid radwaste treatment system which controls the release of site liquid effluents during normal operational occurrences consistent with 10 CFR Part 50, Appendix A, GDC 60 and 10 CFR Part 50, Appendix I, Section II.D, were not added. No loss of primary coolant is involved, neither is an accident condition assumed or implied. Further, the loss of the system is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radiological Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, *[R,T]* respectively. This is a Ginna TS Category (iii) change.

iv. Existing TS 3.9.2.1 requirements which assure compliance with 10 CFR Part 20 for the dose rate due to radioactive material released in gaseous effluents beyond the site boundary were not added. No screening criteria apply because the process variable of the LCO is not an initial condition of a DBA or transient analysis. Further, gaseous effluent dose rate during normal operation is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function

do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radiological Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, *[R,T]* respectively. This is a Ginna TS Category (iii) change.

v. Existing TS 3.9.2.2.a, TS 3.9.2.2.c, and TS 3.9.2.4 requirements for dose due to noble gases released in gaseous effluents during normal operation over extended periods were not added. These limits are not related to protection of the public from any DBA or transient analysis. Further, gaseous effluents dose (noble gas) values is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radiological Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, *[R,T]* respectively. This is a Ginna TS Category (iii) change.

vi. Existing TS 3.9.2.2.b, TS 3.9.2.2.c, and TS 3.9.2.4 requirements for dose due to radioiodine, radioactive materials in particulate form, and radionuclides other than noble gases with half-lives greater than 8 days released with gaseous effluents were not added. These limits are not related to protection of the public from any DBA or transient analysis. Further, these gaseous effluents doses are a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radiological Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, *[R,T]* respectively. This is a Ginna TS Category (iii) change.

vii. Existing TS 3.9.2.3 requirements for the gaseous waste treatment system which reduces the activity level in gaseous waste prior to discharge to the environs were not added. The ventilation exhaust system is not assumed in the analysis of any DBA or transient. Further, the system is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radiological Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, *[R,T]* respectively. This is a Ginna TS Category (iii) change.

viii. Existing TS 3.9.2.5 and TS 3.9.2.6 specific requirements for which limit concentration of oxygen in a gas decay tank and the quantity of radioactivity contained in each waste gas decay tank were not added. The level of detail is relocated to Explosive Gas and Storage Tank Radioactivity Monitoring Program described in new Specification 5.5.11 *[R,T]* and a

more generic description is provided. This is a Ginna TS Category (iii) change.

ix. Existing TS 3.9.2.7 requirements for the solid radwaste system which processes wet radioactive waste and operates in accordance with 10 CFR Part 50, Appendix A, for effluent control were not added. The operability of the system is not assumed in the analysis of any DBA or transient. Further, radioactive waste is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radiological Effluent Controls Program *[R,T]* described in new Specifications 5.5.1 and 5.5.4, respectively. This is a Ginna TS Category (iii) change.

23. Technical Specification 3.13 - *Snubbers*

i. TS 3.13 - The requirements for snubbers operability were not added. Since snubbers testing is controlled within the Inservice Testing Program, the level of detail is relocated to the Inservice Testing Program described in new Specification 5.5.8 *[R,T]* and more generic program description is provided. This is a Ginna TS Category (iii) change.

6.0Q3 For current TS requirements show which programmatic controls of TS 3.13 are included in the inservice inspection and inservice test program TS and show which procedural details of TS 3.13 are proposed to be maintained in the improved TS, e.g., relocated to licensee-controlled documents?

25.v. *LTOP Special Report*
Existing TS 3.15.1.3 contains a requirement to report use of the overpressure protection system to mitigate an RCS or RHR pressure transient in accordance with specification 6.9.2. The Special Report is required to include documentation of all challenges to the pressurizer power operated relief valves or RCS vent(s) and a description of the circumstances initiating the transient, the effect of the PORVs or vent(s) on the transient and any other corrective action. These requirements is detailed in improved TS 5.6.4, "Monthly Operating Reports" *[T]* and is generally included in the LER requirements to report a RCS pressure transient that exceeds expected values or that is caused by unexpected factors. This is a Ginna TS Category (i) change.

26. Tech Spec 3.16 - *Radiological Environmental Monitoring [RETS]*

6.0Q4 For current TS requirements show which programmatic controls of TS 3.16 are included in the ODCM and Radioactive Effluents Controls Program TS and which details will be maintained outside TS.

i. Existing TS 3.16.1 and Table 3.16-1 for the radiological environmental program requires measurements of radiation and of radioactive materials in exposure pathways and measurement of specified radionuclides which lead to the highest potential

radiation exposures for members of the public. This program is not related to protection of the public from any DBA or transient analysis. Further, this program is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radioactive Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, *[R,T]* respectively. This is a Ginna TS Category (iii) change.

ii. Existing TS 3.16.2 requirements for the land use census which supports the measurement of radiation and of radioactive materials in those exposure pathways and for those radionuclides which lead to the highest potential radiation exposures for members of the public were not added. This program is not related to protection of the public from any DBA or transient analysis. Further, this program is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radioactive Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, *[R,T]* respectively. This is a Ginna TS Category (iii) change.

iii. TS 3.16.3 - The requirements of the interlaboratory comparison program which confirms the accuracy of the measurements of radiation and of radioactive materials in specified exposure pathways and for those radionuclides which lead to the highest potential radiation exposures for members of the public were not added. This program is not related to protection of the public from any DBA or transient analysis. Further, this program is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radioactive Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, *[R,T]* respectively. This is a Ginna TS Category (iii) change.

28.v.b. *Radioactive Effluent Monitoring Surveillances [RETS]*
Existing TS 4.1.4 and Table 4.1-5 radioactive effluent monitoring instrument functions required by this specification were not added to the new specifications since these process variables are not an initial condition or a DBA or transient analysis. Therefore, the requirements specified for these functions do not satisfy the NRC Final Policy Statement technical specification screening criteria and were relocated to the ODCM and the Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, *[R,T]* respectively. This is a Ginna TS Category (iii) change.

28.i.j. Table 4.1-1, Functional Units #18, #28, and #29 - The Surveillance requirements for radiation monitors R-1 through R-9 and R-17, emergency plan radiation instruments, and environmental monitors, were not added to the new specifications. These process variables are not an initial condition of a DBA or transient analysis. Therefore, the requirements specified for these functions do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, respectively. *[R]* This is a Ginna TS Category (iii) change.

6.0Q5 For current TS requirements show which programmatic controls of TS 4.1.1 and Table 4.1-1 are included in the ODCM Program and Radioactive Effluents Controls Program TS and which details will be maintained outside TS.

29. Technical Specification 4.2 *Inservice Inspection*

i. Existing TS 4.2.1 requirements for the Inservice Inspection Program, which include Quality Groups A, B, and C components, high energy piping outside of containment, snubbers and steam generator tubes, were not added. The level of detail is relocated to licensee controlled documents (Ginna Station QA Manual, Appendix B) *[R]* and a more generic description is provided. This is a Ginna TS Category (iii) change.

6.0Q6 ISI program (TS 4.2) for Quality Groups A, B, and C components, high energy piping outside containment, snubbers and Steam Generator tube requirements are proposed to be moved to the IST program (improved TS 5.5.8) and SG tube surveillance program (improved TS 5.5.9). Also, inservice pump and valve testing contained in existing TS 4.2 are not discussed by change justification 29.i. For the current TS requirements show which programmatic and procedural details of the ISI program and the inservice pump and valve testing contained in existing TS 4.2 are to be maintained in improved TS. Discuss any proposed changes to the QA Manual Appendix C for the inservice pump and valve testing.

31. Technical Specification 4.4.3 *RHR Systems Surveillances*

i. TS 4.4.4 - The requirements for the tendon stress surveillances were not added. The level of detail is relocated to the Pre-stressed Concrete Containment Tendon Surveillance Program described in new Specification 5.5.6 and a more generic program description is provided. *[T, R]* This is a Ginna TS Category (iii) change.

6.0Q7 Requirements proposed to be relocated need an evaluation comparing the proposed change to the criteria of 10 CFR 50.36 and identifying the location of the relocated requirement and the proposed control mechanism for future changes to the relocated requirement. Provide an evaluation of current TS requirements and show which programmatic and procedural details in TS 4.4.4 will be maintained in proposed TS 5.5.6. Existing TS 4.4.3 requirements for testing of the RHR system in the recirculation configuration were not added. The level of detail is relocated to the Primary Coolant

Sources Outside Containment Program described in new Specification 5.5.2 and a more generic program description is provided. *[T, R]* This is a Ginna TS Category (iii) change.

6.0Q8 For the current TS requirements show which programmatic and procedural details in TS 4.4.3 will be maintained in improved TS 5.5.2.

32.v. *Air Filtration System Surveillances*
TS 4.5.2.3 - The requirements denoting the Frequency and conditions of the air filtration system tests were not added to the new specifications. This level of detail is relocated to the Ventilation Filter Testing Program described in new Specification 5.5.10. In addition, the remaining requirements were all relocated to the Administrative Controls section. These are Ginna TS Category (iii) and (i) changes, respectively. *[T, R]*

6.0Q9 What licensee-controlled document will contain the frequency and condition requirements of the air filtration system tests proposed to be relocated? What mechanism will be used to control future changes to these requirements? Proposed specification 5.5.10 states that the test frequencies and methods will be performed, where practical, in accordance with Regulatory Guide 1.52. From this statement it is not possible to identify what changes, if any are being proposed for the existing TS programmatic and procedural details. For the current TS requirements show which programmatic and procedural details in TS 4.4.3 will be maintained in improved TS.

vi. TS 4.5.2.3.6.a - These test requirements were revised to clarify that two separate tests are performed. A HEPA filter test and a charcoal adsorber bank test are separately performed with each requiring a limit of less than 3 inches of water. This is essentially equivalent to a combined test of less than 6 inches of water and is consistent with specified testing standards. This is a Ginna TS Category (vi) change.

6.0Q10 Explain what is meant by essentially equivalent? Explain the extent to which current procedures will need to change to accommodate the proposed change.

33. iv. *Diesel Fuel Oil Surveillances*
TS 4.6.1.d - The diesel fuel oil test requirements were relocated to new TS 5.5.12 and are proposed to be identified as a "program" consistent with the format of NUREG-1431. This is a Ginna TS Category (i) change.

37. Tech Specs 4.10 *Radiological Environmental Monitoring [RETS]*

6.0Q11 The TS policy criteria can not be use to relocate programmatic details or requirements from the design feature and administrative controls TS. Provide justification for changes to existing TS 4.10, 4.10.1, 4.10.2, and 4.10.3 Radiological Environmental Monitoring TS consistent with the content of TS found in 10 CFR 50.36. In addition, Table 3.16-1 referenced in existing TS 4.10.1 is not discussed in the existing TS markup justifications. Provide

a markup of the Table and the necessary discussions for any changes to the existing TS.

i. TS 4.10.1 and Table 4.10-1 - The requirements for the radiological environmental program which provides measurements of radiation and of radioactive materials in specified exposure pathways and for those radionuclides which lead to the highest potential radiation exposures for members of the public were not added. This program is not related to protection of the public from any DBA or transient analysis. Further, this program is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radioactive Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, respectively. This is a Ginna TS Category (iii) change.

ii. TS 4.10.2 - The requirements for the land use census which supports the measurement of radiation and of radioactive materials in those exposure pathways and for those radionuclides which lead to the highest potential radiation exposures for members of the public were not added. This program is not related to protection of the public from any DBA or transient analysis. Further, this program is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radioactive Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, respectively. This is a Ginna TS Category (iii) change.

iii. TS 4.10.3 - The requirements of the interlaboratory comparison program which confirms the accuracy of the measurements of radiation and of radioactive materials in specified exposure pathways and for those radionuclides which lead to the highest potential radiation exposures for members of the public were not added. This program is not related to protection of the public from any DBA or transient analysis. Further, this program is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radioactive Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, respectively. This is a Ginna TS Category (iii) change.

38. Tech Specs 4.11 *Refueling Surveillances*

6.0Q12 What licensee-controlled document will items of the spent fuel pool charcoal adsorbers tests proposed to be relocated? What mechanism will be used to control future changes to these requirements? Provide a justification for adding "penetration and system bypass"

to the charcoal absorber in-place freon test in proposed specification 5.5.10.d.2. Provide a justification for using "absorber" interchangeably with "adsorber" in proposed TS 5.5.10.d. Explain the use of both "adsorber" and "absorber" in existing TS 4.11.1.1.a.

i. TS 4.11.1 - The requirements denoting the Frequency and conditions of the SFP filtration system tests were not added. The level of detail is relocated to the VFTP described in new Specification 5.5.10. *[R]* This is a Ginna TS Category (iii) change.

ii. TS 4.11.1.1.a, 4.11.1.1.b, and 4.11.1.1.c - These charcoal adsorber system testing requirements were relocated to the VFTP described in the Administrative Controls (TS 5.5.10). This is a Ginna TS Category (i) change.

39. Tech Specs 4.12 *Effluent Surveillances [RETS]*
6.0Q13 The TS policy criteria can not be use to relocate programmatic details or requirements from the design feature and administrative controls TS. Provide justification to relocate existing TS 4.12.1, "Liquid Effluents", "4.12.2 "Gaseous Wastes", and 4.12.3, "Waste Gas Decay Tanks" requirements consistent with the content of TS found in 10 CFR 50.36. In addition, Table 3.16-1 referenced in existing TS 4.10.1 is not discussed in the existing TS markup justifications. Provide a markup of the Table and the necessary discussions for any changes to the existing TS.

i. TS 4.12.1.1 and Table 4.12-1 - The requirements for radioactive material released in liquid effluents to unrestricted areas which are limited to the concentrations specified in 10 CFR Part 20, Appendix B, Table II, Column 2, were not added. No screening criteria apply for these requirements because the process variable of the LCO is not an initial condition of a DBA or transient analysis. Further, liquid releases during normal operation are a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radioactive Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, respectively. This is a Ginna TS Category (iii) change.

ii. TS 4.12.1.2 - The requirements for the liquid radwaste treatment system which controls the release of site liquid effluents during normal operational occurrences consistent with 10 CFR Part 50, Appendix A, GDC 60 and 10 CFR Part 50, Appendix I, Section II.D, were not added. No loss of primary coolant is involved, neither is an accident condition assumed or implied. Further, the loss of the system is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are

relocated to the ODCM and the Radioactive Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, respectively. This is a Ginna TS Category (iii) change.

iii. TS 4.12.2.1 and Table 4.12-2 - The requirements which assure compliance with 10 CFR Part 20 for the dose rate due to radioactive material released in gaseous effluents beyond the site boundary were not added. No screening criteria apply because the process variable of the LCO is not an initial condition of a DBA or transient analysis. Further, gaseous effluent dose rate during normal operation is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radioactive Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, respectively. This is a Ginna TS Category (iii) change.

iv. TS 4.12.2.2 - The requirements for dose due to noble gases released in gaseous effluents during normal operation over extended periods were not added. These limits are not related to protection of the public from any DBA or transient analysis. Further, gaseous effluents dose (noble gas) values is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radioactive Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, respectively. This is a Ginna TS Category (iii) change.

v. TS 4.12.3 - The requirements for the gaseous waste treatment system which reduces the activity level in gaseous waste prior to discharge to the environs were not added. The ventilation exhaust system is not assumed in the analysis of any DBA or transient. Further, the system is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the ODCM and the Radioactive Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, respectively. This is a Ginna TS Category (iii) change.

40. Tech Spec 4.13 - *Radioactive Material Source Leakage Tests*
6.0Q14 The TS policy criteria can not be use to relocate programmatic details or requirements from the design feature and administrative controls TS. Provide justification to relocate existing TS 4.13, "Radioactive Material Source Leakage Tests requirements consistent with the content of TS found in 10 CFR 50.36. Provide a markup of the Table and the necessary discussions for any changes to the existing TS.

i. TS 4.13 - The requirements for periodic testing of leakage for radioactive sources were not added. The source leak test are not assumed in the analysis of any DBA or transient. Further, the leakage from radioactive sources is a non-significant risk contributor to core damage frequency and offsite release. Therefore, the requirements specified for this function do not satisfy the NRC Final Policy Statement technical specification screening criteria and are relocated to the TRM. This is a Ginna TS Category (iii) change.

41. Tech Spec 4.14 - *Snubber Surveillance Requirements*
6.0Q15 Show which programmatic controls and procedural details of TS 4.14 are included in the proposed inservice inspection and inservice test program TS and identify current TS requirements that will be controlled outside TS. *[R,T]*

i. TS 4.14 - The requirements for the testing of snubbers were not added. Since snubbers testing is controlled within the Inservice Testing Program, the level of detail is relocated to Inservice Testing Program described in new Specification 5.5.8 and more generic program description is provided. This is a Ginna TS Category (iii) change.

Administrative Controls
49. Tech Spec 6.1 - *Responsibilities*

i. TS 6.1.1 - The requirement was revised to include a statement that the Plant Manager shall approve each proposed test, experiment or modification to structures, systems or components that affect nuclear safety. This is a Ginna TS Category (iv.a) change. *[M]*

ii. TS 6.1 - A new requirement (Specification 5.1.2) was added which establishes the requirement for Shift Supervisor responsibility. This is a Ginna TS Category (iv.a) change.

50. Technical Specification 6.2 - *Organization*

i. Cross references to existing regulatory requirements are redundant and generally not incorporated into NUREG-1431. This is a Ginna TS Category (ii) change. *[L]*

ii. Plant specific management position titles in the current Technical Specifications are replaced with generic titles.*[L]* Personnel who fulfill these positions are required to meet specific qualifications as detailed in proposed TS 5.3, and compliance details relating to the plant specific management position titles are identified in licensee controlled documents. The two major specific replacements are the generic "Plant Manager" for the manager level individual responsible for the overall safe operation of the plant and the generic descriptive use of "the corporate executive responsible for overall plant nuclear safety" in place of the Vice President position. The plant specific titles fulfilling

the duties of these generic positions will continue to be defined, established, documented and updated in a plant controlled document with specific regulatory review requirements for changes (e.g., as the UFSAR or QA Program). This change does not eliminate any of the qualifications, responsibilities or requirements for these personnel or the positions. This is a Ginna TS Category (vi) change. *[Get Human Factors Assessment Branch approval]*

iii. TS 6.2.1.d - The requirement describing the capability of training, health physics and quality assurance to have direct access to responsible corporate management to support mitigation of their concerns was not added. Proposed TS 5.2.1.a requires that "lines of authority, responsibility and communication shall be established and defined throughout the highest management levels." The organizational structure is specified in the Ginna Station QA Program. Since changes to the QA Program are controlled by 10 CFR 50.54(a)(3), equivalent control is provided. This is a Ginna TS Category (ii) change. *[R]*

iv. TS 6.2.2.b - The requirements describing the required operating crew compositions were not added. These requirements are specified in 10 CFR 50.54(k), (l), and (m) and proposed TS 5.2.2.a, 5.2.2.b, and 5.2.2.e. This is a Ginna TS Category (ii) change. *[R]*

v. TS 6.2.2.d - The requirement was revised to clarify that the individual qualified in radiation protection procedures is allowed to be absent for not more than two hours. This is consistent with the requirements for shift crew composition. This is a Ginna TS Category (v.c) change. *[M]*

vi. TS 6.2.2.e - The requirement describing the overtime requirement for plant staff who perform safety related functions was revised to reference a NRC approved program for controlling overtime. This is a Ginna TS Category (vi) change.

6.0Q16 Provide a discussion showing that the proposed changes result in the same limits as the current requirements, or represent an enhanced presentation of the existing TS intent.

51. Technical Specification 6.3 - *Station Staff Qualifications*

i TS 6.3.1 - The reference to the RG&E letter dated December 30, 1980, was replaced with wording considered more appropriate. The current STA program at Ginna Station is discussed in References 40 and 42 and was reviewed and approved by the NRC. The revised wording eliminates the need to revise the Technical Specifications if the STA program is later revised, but still requires NRC approval of these changes. This is a Ginna TS Category (vi) change.

6.0Q17 Provide discussion showing that the proposed changes result in the same limits as the current requirements, or represent an enhanced presentation of the existing TS intent.

52. Technical Specification 6.4 - *Training*

i. TS 6.4 - The requirements for a Training Program were not added. The requirements are either adequately addressed by other Section 5.0 administrative controls or are addressed by 10 CFR 55 requirements. This is a Ginna TS Category (ii) change. *[R]*

53. Technical Specification 6.5

None.

54. Technical Specification 6.6

None.

55. Tech Spec 6.7 *Safety Limit Violation*
6.0Q18 For each of the Category (ii) changes identify the plant document that includes the duplicate TS requirement.

i. TS 6.7.1.a - The initial operator actions for Safety Limit (SL) violations were revised as follows:

a. For violation of the Reactor Core or RCS Pressure SL in MODES 1 and 2, the requirement to immediately shutdown the reactor (effectively to be in MODE 3) was revised to allow 1 hour to restore compliance and place the unit in MODE 3. Immediately shutting down the reactor could infer action to immediately trip the reactor. The revision provides the necessary time to shutdown the unit in a more controlled and orderly manner than immediately tripping the reactor which could result in a plant transient. The proposed time continues to minimize the time allowed to operate in MODE 1 or 2 with a SL not met. This is a Ginna TS Category (v.b.44) change. *[L]*

b. For violation of the RCS Pressure SL in MODES 3, 4, and 5, an additional action was added which requires restoring compliance with the SL within 5 minutes. Specifying a time limit for operators to restore compliance provides greater guidance to plant staff. This is a Ginna TS Category (v.a) change. *[M]*

ii. TS 6.7.1.b - The requirement for notification to management personnel and the offsite review function of a SL violation was not added to the new specifications. Notification requirements are relocated to the TRM. This is a Ginna TS Category (iii) *[R]* change. The requirement for notification to the NRC of a SL violation was not added to the new specifications since this requirement is denoted in 10 CFR 50.36 and 10 CFR 50.72. This is a Ginna TS Category (ii) change. *[R]*

iii. TS 6.7.1.c - The requirement that a Safety Limit Violation Report be prepared was not added to the new specifications. This is a duplication of requirements denoted in 10 CFR 50.36 and 10 CFR 50.73. This is a Ginna TS Category (ii) change. The requirement for the onsite review committee to review the Safety Limit Violation Report was not added to the new specifications. The responsibilities of the onsite review committee are relocated to the TRM. This is a Ginna TS Category (iii) change. SL violations are reported to the NRC in accordance with the provisions of 10 CFR 50.73. The details describing the requirements for content of the Safety Limit Violation Report is, therefore, controlled by the provisions of 10 CFR 50.73 and does not need to be specified in TS. This is a Ginna TS Category (ii) change. *[R]*

iv. TS 6.7.1.d - The requirement for the submittal of a Safety Limit Violation Report to the NRC was not added to the new specifications. This is a duplication of requirements denoted in 10 CFR 50.36 and 10 CFR 50.73. This is a Ginna TS Category (ii) change. *[R]* The requirement for the submittal of a Safety Limit Violation Report to management personnel and the offsite review function was not added to the new specifications. The distribution of reports submitted in accordance with 10 CFR 50.73 are relocated to the TRM. This is a Ginna TS Category (iii) change. *[R]*

56. Technical Specification 6.8 *Procedures*

6.0Q19 For each of the Category (ii) changes discuss identify the plant document that includes the duplicate TS requirement.

i. TS 6.8.1.d - The Offsite Dose Calculation Manual implementation is covered by a more generic item which is specified in Section 5.5. It is not necessary to specifically identify each program under procedures (see Section D, item 56.iv). Since the requirements remain, this is considered to be a change in the method of presentation only. This is a Ginna TS Category (i) change. *[A]*

ii. TS 6.8.1.e - The PCP description was not added since this program only implements the requirements of 10 CFR 20, 10 CFR 61, and 10 CFR 71 and does not impose any new regulations. The detailed description of the PCP is provided in licensee controlled documents with the requirement for the PCP relocated to the TRM. This is a Ginna TS Category (ii) change. *[R]*

iii. TS 6.8.1 - A new specification (TS 5.4.1.b) was added which establishes the requirement for written emergency operating procedures implementing the requirements of NUREG-0737 and NUREG-0737, Supplement 1. This is a Ginna TS Category (iv.a) change. *[A]*

iv. TS 6.8.1 - A new specification (TS 5.4.1.e) was added which establishes the requirement for written procedures for programs and manuals denoted in new Specification 5.5. These Programs include:

ITS	Current TS	Program
5.5.1	1.13	Offsite Dose Calculation Manual
6.15		
5.5.2	4.4.3	Primary Coolant Sources Outside Containment
5.5.3	New	Post Accident Sampling Program
5.5.4	3.9	Radioactive Effluent Controls Program
3.16		
5.5.5	New	Component Cyclic or Transient Limit
5.5.6	4.4.4	Pre-Stressed Concrete Containment Tendon Surveillance Program
5.5.7	New	Reactor Coolant Pump Flywheel Inspection Program
5.5.8	4.2	Inservice Testing Program
5.5.9	4.2	Steam Generator (SG) Tube Surveillance Program
5.5.10		Ventilation Filter Testing Program
4.5.2.3		
4.11.1		
5.5.11		Explosive Gas and Storage Tank
3.9.2.5		
3.9.2.6		Radioactive Monitoring Program
5.5.12		Diesel Fuel Oil Testing Program
4.6.1.d		
5.5.13	New	Technical Specification Bases Control
5.5.14	New	Safety Function Determination Program

The technical content of several requirements are being moved from other chapters of the current Technical Specifications and are proposed to be identified as Programs in accordance with the format of NUREG-1431. This is a Ginna TS Category (i) change. Other programs were added, except as discussed below, to ensure consistency in the implementation of required programs within the current licensing basis. The Radioactive Effluent Controls Program was added due to the relocation of the radiological Technical Specifications consistent with Generic Letter 89-01 and the changes to 10 CFR 20. The Bases Control program was added to specifically delineate the appropriate methods and reviews necessary for a change to the Technical Specification Bases. The Safety Function Determination Program was added to support implementation of the support system operability characteristics of the Technical Specifications (new LCO 3.0.6). These are Ginna TS Category (iv.a) changes. *[A]*

57. Technical Specification 6.9 - *Reporting Requirements*

6.0Q20 For each of the Category (ii) changes identify the plant document that includes the duplicate TS requirement.

i. TS 6.9 - The reference to reporting requirements were revised consistent with 10 CFR 50.4. This is a Ginna TS Category (vi) change. *[A]*

ii. TS 6.9.1.1 - The requirement to submit a Startup Report was not added. The Startup Report is more appropriately addressed in the

NRC Safety Evaluation Report authorizing an Operating License, increased power level, installation of a new nuclear fuel design or manufacturer, or modifications which significantly alter the nuclear, thermal, or hydraulic performances of the plant. The Startup Report is required to be submitted within 90 days following completion of the above activities and does not require NRC approval. Therefore, inclusion of the requirement for this report in Technical Specifications is not necessary to assure safe plant operation. This is a Ginna TS Category (ii) change. *[R]*

iii. TS 6.9.1.2 - The requirements describing the details of the monthly report were not added. These details are appropriately relocated to procedures or other licensee controlled documents. This is a Ginna TS Category (iii) change. *[R]*

6.0Q21 Provide discussion for the changes shown as a markup of existing TS 6.9.1.2.

iv. TS 6.9.1.3, TS 6.9.1.4, Table 6.9-1 and Table 6.9-2 - The details and methods implementing these specifications were not added. These details are appropriately relocated to the ODCM and the Effluent Controls Program described in new Specifications 5.5.1 and 5.5.4, respectively. The submittal date was also changed to May 15th to allow the submittal of the Annual Radiological Environmental Operating Report to correspond with the Monthly Operating Report submittal date. This is a Ginna TS Category (iii) change. *[R]*

v. TS 6.9.1.4 - The specific date referenced for the annual submittal was revised consistent with the requirements of 10 CFR 50.36a. This is a Ginna TS Category (vi) change. *[A]*

vi. TS 6.9.1.5 - The requirement for the reporting of challenges to pressurizer PORVs or safety valves was revised from an annual to a monthly report and relocated to the Monthly Operating Report (new Specification 5.6.4). This is a Ginna TS Category (v.c) change. *[A]*

vii. TS 6.9.2.1 - The reporting requirement related to sealed sources was not added since this is specified in 10 CFR 30.50. This is a Ginna TS Category (ii) change. *[R]*

6.0Q22 For the Category (ii) change identify the plant document that includes the duplicate TS requirement.

viii. TS 6.9.2.4 - The reporting requirement for reactor overpressure protection system operation was revised. The reporting requirement is detailed in proposed Specification 5.6.4, and is generally included in the LER requirements to report a RCS pressure transient that exceeds expected values or that is caused by unexpected factors. Since the criteria identified in 10 CFR 50.73 includes the area of degraded boundaries that necessitates reporting, any minor

differences are negligible with regard to safety. This is a Ginna TS Category (v.c) change. *[R]*

6.0Q23 Provide discussion showing that the proposed changes result in the same limits as the current requirements, or represent an enhanced presentation of the existing TS intent.

ix. A new requirement TS 5.6.5 was added which establishes the reporting requirement for the COLR. The COLR is required due to the removal of existing Technical Specification core operating limits. This is a Ginna TS Category (iv.a) change.. *[M]*

x. A new requirement TS 5.6.6 was added which establishes the reporting requirement for the RCS PTLR. The PTLR is required due to the removal of existing Technical Specification pressure and temperature operating limits. This is a Ginna TS Category (iv.a) change. *[M]*

58. Technical Specification 6.10

None.

59. Technical Specification 6.11

None.

60. Technical Specification 6.12

None.

61. Technical Specification 6.13

i. TS 6.13.1 - Plant specific position titles in the current Ginna Station TS were replaced with generic titles. The plant specific titles fulfilling the duties of these generic positions will continue to be defined, established, documented and updated in a plant controlled document with specific regulatory review requirements for changes (e.g., the UFSAR or QA Program). This change does not eliminate any of the qualifications, responsibilities or requirements for these personnel or the positions. This is a Ginna TS Category (vi) change. *[L]*

6.0Q24 Provide discussion showing that the proposed changes result in the same limits as the current requirements, or represent an enhanced presentation of the existing TS intent.

62. Technical Specification 6.14

None.

63. Technical Specification 6.15

i. TS 6.15.1.b - The approval process for ODCM changes was revised to clarify that the effective changes be approved by the Plant Manager instead of the onsite review function. Since the onsite review function reports to the Plant Manager, this is a conservative change. This is a Ginna TS Category (v.c) change. *[A]*

64. Technical Specification 6.16

i. TS 6.16 - The process for changes to the PCP was not added to the new specifications since this program only implements the requirements of 10 CFR Part 20, 10 CFR Part 61, and 10 CFR Part 71 and does not impose any new requirements. The detailed description of the PCP is provided in licensee controlled documents and the requirement for the program is relocated to the TRM. This is a Ginna TS Category (ii) change. *[R]*

6.0Q25 For the Category (ii) change discuss identify the plant document that include the duplicate requirement.

65. Technical Specification 6.17

i. TS 6.17 - The requirements for major changes to radioactive waste treatment systems was not added. Changes to these systems are controlled by 10 CFR 50.59. NRC notification of significant changes to these systems is addressed by 10 CFR 50.59(b)(2). Therefore, this specification is relocated to the TRM. This is a Ginna TS Category (iii) change. *[R]*

6.0Q26 For the Category (iii) change identify the plant document that includes the duplicate requirement.

<u>Section 6.0 Improved TS</u>

114. ITS 5.1

i. Incorporation of approved Traveller BWOG-09, C.1.

ii. Incorporation of approved Traveller NRC-02, C.21.

iii. Incorporation of approved Traveller BWOG-09, C.2.

115. ITS 5.2

i. TS 5.2.1.c - This section describing the capability of training, health physics and quality assurance to have direct access to responsible corporate management to support mitigation of their concerns was not added. TS 5.2.1.a requires that "lines of authority, responsibility and communication shall be established and defined throughout the highest management levels." The organizational structure is specified in the Ginna Station QA Program. Since changes to the QA Program are controlled by 10 CFR.

50.54(a)(3), equivalent control is provided. This is an ITS Category (iii) change.

6.0Q27 Provide a submittal to correct the referenced TS to TS 5.2.1.d. This proposed change is a generic relaxation that requires an approved NEI traveler. Provide the RGE policy that implements this administrative control.

ii. Incorporation of approved Traveller BWOG-09, C.3.

iii. TS 5.2.2.b - This section describing the required operating crew compositions was not added. These requirements are specified in 10 CFR 50.54(k), (l), and (m) and proposed TS 5.2.2.a, 5.2.2.b, and 5.2.2.e. This is an ITS Category (iii) change.

6.0Q28 Provide discussion explaining in more detail the equivalence of the referenced proposed TS and the regulations to the NUREG.

iv. Incorporation of approved Traveller BWOG-09, C.4.

v. TS 5.2.2.e - This section describing the overtime requirement for unit staff who perform safety related functions to require control in accordance with an NRC approved program was revised. RG&E currently utilizes a staff working hour control program which slightly differs from he NRC Policy Statement on Working Hours (Generic Letter 88-12). This program was previously reviewed and approved by the NRC (Ref. 40). The proposed wording is considered more appropriate and consistent with the current Technical Specifications. This is an ITS Category (i) change. *[A]*

vi. TS 5.2.2.f - This section describing the requirements for the Operations Manager to hold an SRO license was not added. The qualifications of this position are addressed in ANSI Standard N18.1-1971 referenced in TS 5.3. This is an ITS Category (i) change.

--Open--NRC Action-- Human Factors Branch acceptance review required.

vii. TS 5.2.2.g - This section describing the requirements of the Shift Technical Advisors (STAs) was revised. The requirements specified in TS 5.3.1 are moved to TS 5.2.2.g in accordance with approved Traveller BWOG-09, C.6. The wording of Traveller BWOG-09, C.6 was revised to reflect more appropriate and consistent wording to Ginna Station commitments. The STA program does not meet all he requirements denoted in the Commission Policy Statement on Engineering Expertise on Shift (Generic Letter 86-04). The current STA program is discussed in References 41 and 42 and was reviewed and approved by the NRC. This is an ITS Category (i) change.

6.0Q29 Revise proposed TS 5.2.2.g to incorporate the specific information in Refs. 41 and 42 in place of the Commission Policy Statement on Engineering Expertise on Shift.

116. ITS 5.3

i. TS 5.3.1 - The requirement for qualifications of staff not covered by Regulatory Guide 1.8 was not added. This requirement was not considered necessary since all activities which affect nuclear safety are controlled by other technical specification requirements, existing regulations, and the QA Program. Also, Revision 1 of Regulatory Guide 1.8 was not revised to Revision 2 in order to maintain consistency with the current QA Program and existing procedures. This is an ITS Category (i) change.

6.0Q30 For the category (i) change explain all changes to the current TS requirements showing how the proposed TS limits are the same as the current limits.

ii. Incorporation of approved Traveller BWOG-09, C.6.

117. ITS 5.4

i. Incorporation of approved Traveller BWOG-09, C.7.

118. ITS 5.5

i. Incorporation of approved Traveller BWOG-09, C.8.

119. ITS 5.6

i. Incorporation of approved Traveller BWOG-09, C.9.

ii. Incorporation of approved Traveller WOG-06, C.1, was modified due to the format changes provided by Traveller BWOG-09, C.9.

120. ITS 5.7 - *Program and Manuals*

i. Incorporation of approved Traveller BWOG-09, C.10.

ii. Incorporation of approved Traveller WOG-06, C.7.

iii. Incorporation of approved Traveller BWOG-09, C.11, supersedes changes proposed by approved Travellers WOG-06, C.2, and WOG-06, C.3.

iv. Incorporation of approved Traveller BWOG-09, C.12.

v. Incorporation of approved Traveller BWOG-09, C.13.

vi. Incorporation of approved Traveller BWOG-09, C.13, supersedes changes proposed by approved Traveller WOG-06, C.3. Additional cross references, similar to those deleted by Traveller BWOG-09, C13, were not added. In general, the format of the NUREG-1431 does not include the use of cross references. This is an ITS Category (iv) change.

vii. These changes are provided for consistency with the new 10 CFR 20 references. This is an ITS Category (iv) change.

6.0Q31 Confirm that the NRC staff accepts the new 10 CFR Part 20 Ginna licensing basis.

viii. Incorporation of approved Traveller BWOG-09, C.14.

ix. Incorporation of approved Traveller BWOG-09, C.15.

x. Incorporation of approved Traveller BWOG-09, C.16.

xi. Incorporation of [approved] Traveller BWOG-09, C.17.

xii. TS 5.7.2.13 - The requirements for the Steam Generator (SG) Tube Surveillance Program were revised to reflect current Ginna Station licensing basis. Incorporation of approved Traveller BWOG-09, C.18, provided a reviewers note that the licensees current licensing basis program description be provided. The proposed TS 5.5.9 provides this program description. This is an ITS Category (iv) change.

6.0Q32 Provide a source document reference for the SG Tube Surveillance Program description used in proposed TS 5.5.9.

xiii. Incorporation of approved Traveller WOG-06, C.4.

xiv. TS 5.7.2.15 - The requirements for the Ventilation Filter Testing Program (VFTP) were revised to reflect current Ginna Station test frequencies and methods. These are performed, where practical, in accordance with Regulatory Guide 1.52 and ANSI N510-1975. Due to the revision of TS 5.7.2.15, the approved traveller WOG-06, C.5, was not incorporated. This is an ITS Category (i) change.

6.0Q33 Provide documentation that proposed TS 5.5.10 changes result in the same limits as the current TS limits. Also, include documentation of the proposed changes to the NUREG that delete the provisions of SR 3.0.2 and SR 3.0.3

xv. Incorporation of approved Traveller NRC-02, C.13.

xvi. TS 5.7.2.16 - The requirement for control of the quantity of radioactivity contained in outdoor liquid radwaste tanks was not added since there are no outdoor liquid radwaste tanks at Ginna Station. The description of the methodology used in determining radioactivity quantities in the waste gas

decay tanks was revised to reflect current licensing basis. This is an ITS Category (i) change.

6.0Q34 Provide documentation that the proposed TS 5.5.11, Explosive Gas and Storage Tank Radioactivity monitoring program results in the same limits as current TS.

xvii. TS 5.7.2.12 - The inservice testing program description was revised to include high energy piping outside containment and steam generator tubes. This is consistent with the Ginna Station current licensing basis and approved IST program. This is an ITS Category (ii) change.

6.0Q35 Provide documentation that the proposed TS 5.5.4.b, limitations on liquid effluent releases to unrestricted areas and proposed TS 5.5.8, ITS Program results in the same limits as current TS.

xviii. TS 5.7.2.17 - The requirement denoting the purpose of the diesel fuel oil testing program was revised to reflect Ginna Station current licensing basis. Approved Traveller WOG-06, C6, was not incorporated due to the proposed revisions to these requirements. This is an ITS Category (i) change.

6.0Q36 Provide documentation that the proposed TS 5.5.12, diesel fuel oil testing program results in the same limits as current TS.

xix. Incorporation of approved Traveller BWOG-09, C.19.

xx. TS 5.7.2.14 - The secondary water chemistry program was revised consistent with the current program specified in the Ginna Station license. These are ITS Category (i) changes.

6.0Q37 Provide the correct reference in place of reference 120.xx on page 5.0-21, 5.0-25 in the NUREG markup as necessary. Provide documentation that proposed TS 5.5.2, and proposed TS 5.5.5 [need the FSAR reference] result in the same limits as the current TS. Include an explanation of why the proposed deletion of the ALARA program objective does not apply to Ginna. Provide a source document reference for the Secondary Water Chemistry Program description used in proposed TS 5.5.15.

121. ITS 5.8

i. Incorporation of approved Traveller BWOG-09, C.20.

ii. Incorporation of approved Traveller BWR-25, C.3.

122. ITS 5.9

i. Incorporation of approved Traveller BWOG-09, C.21.

ii. The incorporation of approved Traveller BWOG-09, C.21, was revised to reflect a submittal date consistent with the reporting requirements of 10 CFR 20.2206(c). This is an ITS Category (iv) change.

6.0Q38 Provide documentation that the proposed TS 5.6.1 results in the same limits as current TS.

iii. Incorporation of approved Traveller BWOG-09, C.22.

iv. Incorporation of approved Traveller BWOG-09, C.23.

v. Incorporation of approved Traveller BWR-06, C.7.

vi. TS 5.9.2.b - The requirement for a special report following four or more valid failures of an individual emergency diesel generator in the last 25 demands was not added since the requirement is not specified in the current Technical Specifications. Any required report can be adequately controlled by the licensees administrative controls. This is an ITS Category (i) change.

6.0Q39 Provide discussion explaining a technical or hardship basis for not choosing to adopt the NUREG TS.

vii. TS 5.9.2.d - The requirement for a special report following degradation of the containment structure detected during test required by the Pre-stressed Concrete Containment Tendon Surveillance Program was not added since the requirement is not specified in the current Technical Specifications. Any required report can be adequately controlled by the licensees administrative controls. This is an ITS Category (i) change.

6.0Q40 Provide discussion explaining a technical or hardship basis for not choosing to adopt the NUREG TS.

viii. Incorporation of approved Traveller BWOG-09, C.18. This Traveller was revised to reflect that the requirement for a special report for steam generator tube inspections was not added since the requirement is not specified in the current Technical Specifications. Any required report can be adequately controlled by the licensees administrative controls. This is an ITS Category (i) change.

6.0Q41 Provide discussion explaining a technical or hardship basis for not choosing to adopt the NUREG TS.

ix. TS 5.9.2.c - The requirement for a Special Report following extended Post Accident Monitoring instrumentation inoperability and the associated details of the report and when it should be submitted were not added. The details can be adequately controlled by the licensee's administrative controls. This information was added to the bases for the LCO Required Actions which required the Special Report to be written. This is an ITS Category (iii) change.

6.0Q42 This report is necessary to the proper application of the PAM instrumentation TS. Provide a redraft of the PAM TS and the associated Bases that moves the report to an LCO Action condition

for failure to meet channel operability requirements for radiation monitors located inside containment. Otherwise the alternative is to initiate a plant shutdown.

6.0Q43 Comment 122.x is used in the NUREG markup. Provide the discussion.

123. ITS 5.10

i. Incorporation of approved Traveller BWOG-09, C.24, supersedes the incorporation of approved Traveller BWR-06, C.8.

124. ITS 5.11

i. These changes are provided for consistency with the new 10 CFR 20 references. This is an ITS Category (iii) change.

6.0Q44 Document that the NRC staff accepts the new 10 CFR Part 20 Ginna licensing basis.