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SUBJECT: Forwards response to NRC request for addl info dtd 970410 re Improved TS Section 3.9, "Refueling Operations."

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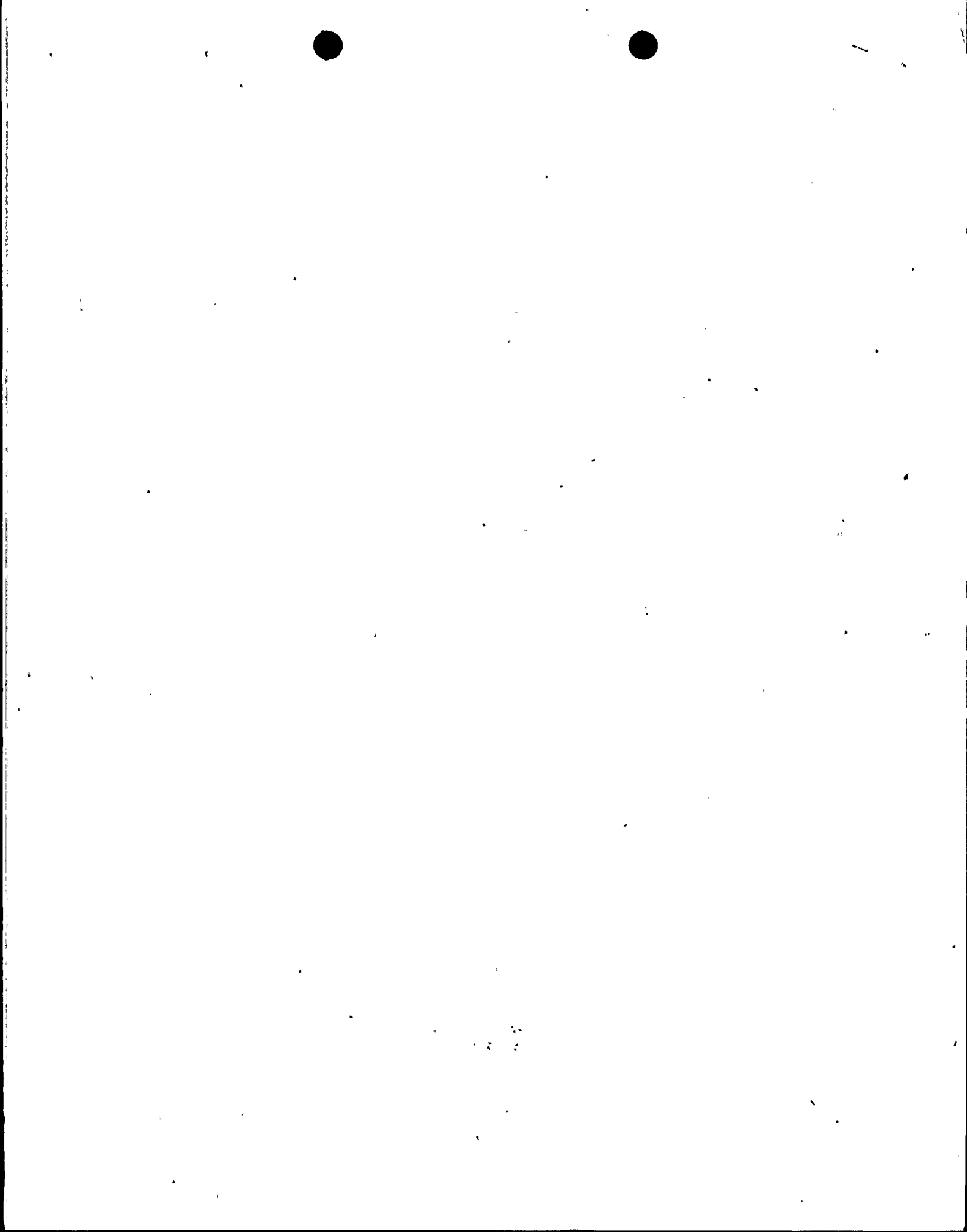
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102-03971 - JML/SAB/TNW
July 18, 1997

**Subject: Palo Verde Nuclear Generating Station (PVNGS)
Units 1, 2, and 3
Docket Nos. STN 50-528/529/530
Response to NRC Request for Additional Information (RAI) for
Improved Technical Specification (ITS) Section 3.9,
"Refueling Operations"**

Dear Sirs:

Enclosed please find the response to your request for additional information dated April 10, 1997, regarding ITS Section 3.9, "Refueling Operations." The NRC "Description of Issues" and the corresponding PVNGS responses are provided as Enclosure 1 in a tabular format similar to the RAI. The enclosed responses reflect the telephone conversation with members of your staff on July 1, 1997. ITS 3.9 submittal pages, as modified by the responses to the RAI, are provided as Enclosure 2.

Generic change TSTF number 20 to NUREG 1432, revision 1 is incorporated into ITS Section 3.9.

Please contact Mr. Scott Bauer at (602) 393-5978 if you have any questions or would like additional information regarding this matter.

Sincerely,

JML/SAB/TNW/mah

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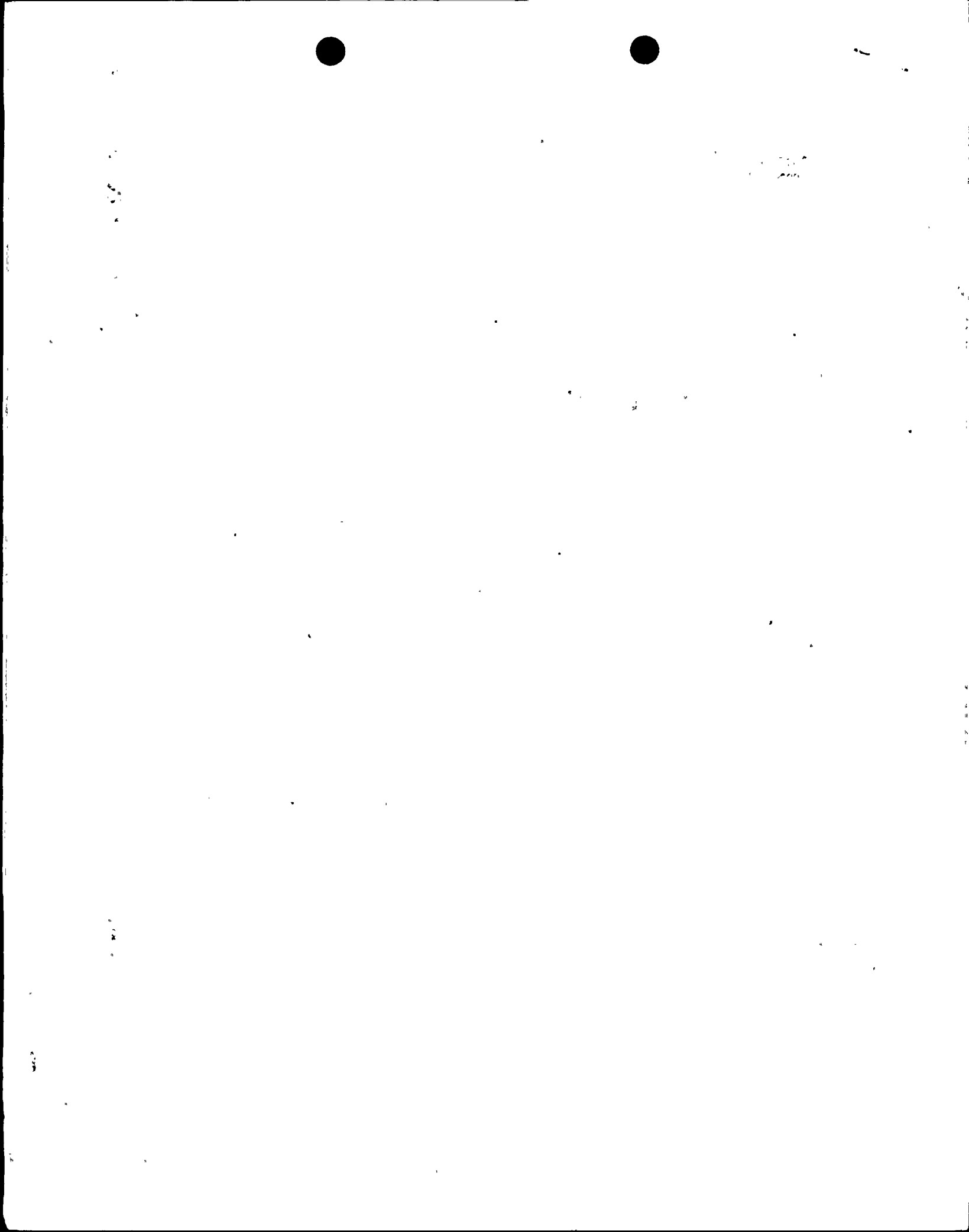
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ADDI/

Enclosure 1 Response to Request for Additional Information
Enclosure 2 ITS Section 3.9, "Refueling Operations"



9708010086 970718
PDR ADDCK 05000528
P PDR



STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

I, J. M. Levine, represent that I am Senior Vice President - Nuclear, Arizona Public Service Company (APS), that the foregoing document has been signed by me on behalf of APS with full authority to do so, and that to the best of my knowledge and belief, the statements made therein are true and correct.



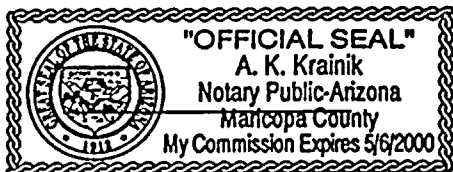
J. M. Levine

Sworn To Before Me This 18 Day Of July, 1997.



Notary Public

My Commission Expires





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SAMPLE FORM PV419-05AE

PVNGS LICENSING DOCUMENT AMENDMENT/
AMENDMENT REQUEST APPROVAL

DATE 7/1/97

UNIT	<input checked="" type="checkbox"/> PVNGS-1	<input checked="" type="checkbox"/> PVNGS-2	<input checked="" type="checkbox"/> PVNGS-3	<input type="checkbox"/> GENERIC	LOG NO. _____
	<input type="checkbox"/> UFSAR	<input type="checkbox"/> OCAP	<input type="checkbox"/> TS	<input type="checkbox"/> RMAC	SECTION(S) AFFECTED (ATTACH REVISED OR MARKED-UP PAGES) ITS Section 3.9
<input type="checkbox"/> USQ	<input type="checkbox"/> EP	<input type="checkbox"/> EPP	<input checked="" type="checkbox"/> OTHER <u>ITS</u>		
<input type="checkbox"/> SP	<input type="checkbox"/> OL	<input type="checkbox"/> COLR			

DESCRIPTION (BASIS/JUSTIFICATION) **

Response to NRC RAI on ITS
Section 3.9, "Refueling Operations."

PREPARED BY TUW OB

REVIEWED BY [Signature]

SECTION LEADER - LICENSING

DATE 7/2/97

DATE 7/16/97

NRC PRIOR APPROVAL OR NOTIFICATION REQUIRED: YES NO

REQUIRED CONCURRENCE/APPROVALS:

- CONCUR: _____ DATE _____
APPLICABLE DEPARTMENT HEAD
- CONCUR: _____ DATE _____
APPLICABLE DEPARTMENT HEAD
- CONCUR: see concurrence on letter TUW... 7/4/97
OPERATIONS DIRECTOR
- CONCUR: _____ DATE _____
DIRECTOR, NUCLEAR ASSURANCE
- CONCUR: [Signature] 7/17/97
PLANT REVIEW BOARD
- CONCUR: [Signature] 7/17/97
OSRC
- APPROVE: [Signature] 7/17/97
DEPARTMENT LEADER, NUCLEAR REGULATORY AFFAIRS

ENCLOSURE 1

Response to Request for Additional Information

9708010086



PVNGS ITS 3.9.1 BORON CONCENTRATION

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.1-1	JD.2	STS 3.9.1	<p>Section 3.9.1 Exception 2 (Justification for Deviation), CTS 3.9.2 Action "b" markup, and Section 3.9.2 More Restrictive Justification M.2 contradict. STS 3.9.1 Exception 2 provides justification for removing the reference to "Refueling Cavity" from ITS 3.9.1. CTS 3.9.2 Action "b" markup and Section 3.9.2 More Restrictive change M.2 include the "Refueling Cavity" when addressing areas for boron concentration sampling. This justification is inadequate for removal of "Refueling Cavity" from ITS 3.9.1.</p> <p>COMMENTS: Provide additional discussion and justification for the STS deviation.</p>	<p>Additional discussion and justification has been provided in NUREG Exception 3 of ITS 3.9.1 for the removal of the reference to the "Refueling Cavity." The CTS markup and More Restrictive change M.2 of ITS 3.9.2 have been changed to be consistent with ITS 3.9.1. There were no changes to the ITS specifications of ITS 3.9.1 or 3.9.2 necessary as a result of this comment.</p>
3.9.1-2	LA.2	CTS 4.9.1.1	<p>CTS 4.9.1.1 states the boron concentration shall be determined to be within the limits specified in the COLR prior to unbolting or removing the reactor pressure vessel head, and prior to withdrawal of any full-length Control Element Assembly in excess of 3 feet from its fully inserted position within the reactor pressure vessel. These details are not included in ITS 3.9.1. The justification does not specify to which procedure the information is moved.</p> <p>Comment: Provide the specific procedure to which the information is moved and the applicable controls applied.</p>	<p>In PVNGS letter number 102-03942 to the NRC dated May 30, 1997, PVNGS has provided a matrix of the relocated requirements identified during the ITS conversion. The letter also identifies the applicable controls that will be applied once the requirement is relocated. With respect to this specific comment, the requirement (LA.2 of ITS 3.9.1) is being relocated to the Technical Requirements Manual (TRM) which will be controlled in accordance with the provisions of 10 CFR 50.59.</p>



PVNGS ITS 3.9.2 NUCLEAR INSTRUMENTATION

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.2-1	None	<p>CTS 3.9.2.a</p> <p>STS 3.9.2.A</p>	<p>CTS 3.9.2.a states in part "suspend all operations involving CORE ALTERATIONS <u>or</u> positive reactivity changes." STS 3.9.2 REQUIRED ACTION A.1 and A.2 state Suspend CORE ALTERATIONS <u>and</u> Suspend positive reactivity additions. No justification is provided for this More Restrictive change.</p> <p>Comment: Provide discussion and justification for the More Restrictive change.</p>	<p>The CTS requires suspension of all operations involving CORE ALTERATIONS or positive reactivity changes. Suspension of all operations involving CORE ALTERATIONS or positive reactivity changes requires both CORE ALTERATIONS and positive reactivity changes to be suspended. This is equivalent to the ITS requirements. The ITS requires suspension of CORE ALTERATIONS and suspension of positive reactivity changes. The ITS format and wording are different than the CTS but both require suspension of CORE ALTERATIONS and positive reactivity changes. Since the requirements of the CTS are equivalent to the ITS, the change was covered as an administrative change necessary for conversion to the format of the ITS under change A.1. Change number M.1 of specification 3.9.1 has been deleted with the change covered under administrative change number A.1. No additional action is needed for resolution of this comment.</p>

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PVNGS ITS 3.9.2 NUCLEAR INSTRUMENTATION

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.2-2	None	CTS 3.9.2 ITS 3.9.1	<p>CTS 3.9.2 Action "b" markup, and Section 3.9.2 More Restrictive Justification M.2 contradict Section 3.9.1 Exception Number 2 (Justification of Deviation). CTS 3.9.2 Action "b" markup and Section 3.9.2 More Restrictive change M.2 include the "Refueling Cavity" when addressing areas for boron concentration sampling. Section 3.9.1 Exception Number 2 provides justification for removing the reference to "Refueling Cavity" from the ITS. There is inadequate justification for the inclusion <u>and</u> removal of "Refueling Cavity."</p> <p>Comment: Provide justification for the inclusion <u>and</u> removal of "Refueling Cavity".</p>	See response to issue number 3.9.1-1.

PVNGS ITS 3.9.2 NUCLEAR INSTRUMENTATION

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.2-3	A.2	CTS 4.9.2	<p>CTS 4.9.2 does not contain an equivalent NOTE to ITS SR 3.9.2.2 NOTE excluding the neutron detectors from the CHANNEL CALIBRATION. The justification equates the testing accomplished in a CHANNEL FUNCTIONAL TEST to that accomplished in a CHANNEL CALIBRATION. These two tests are not equal thus the justification inadequate. Also, including the NOTE in ITS 3.9.2 which does not exist in CTS 4.9.2 constitutes a Less Restrictive change rather than an Administrative change.</p> <p>Comment: Provide discussion and justification for the Less Restrictive change</p>	<p>The CTS requires a CHANNEL FUNCTIONAL TEST of the startup range neutron flux monitors within 8 hours prior to the initial start of CORE ALTERATIONS and at least once per 7 days. The ITS requires a CHANNEL CALIBRATION every 18 months and excludes the neutron detectors from the CHANNEL CALIBRATION. PVNGS identified the changes with respect to this SR by 3 separate change identifiers:</p> <ul style="list-style-type: none"> • Change L.2 addresses the deletion of the CHANNEL FUNCTIONAL TEST from the CTS • Change M.3 addresses the addition of the CHANNEL CALIBRATION to the ITS • Change A.2 addresses the note which excludes the neutron detectors from the CHANNEL CALIBRATION <p>The CTS does not contain a note to exclude the neutron detectors from a CHANNEL CALIBRATION because there is no requirement in CTS 4.9.2 for a CHANNEL CALIBRATION. A note to exclude the neutron detectors from the CHANNEL FUNCTIONAL TEST is not necessary since the neutron detectors are not within the scope of a CHANNEL FUNCTIONAL TEST as defined in the CTS definition section. A CHANNEL CALIBRATION, by definition, does include the sensors, so a note to exclude the neutron detectors is needed and therefore was included as part of the ITS. Adding the note was determined to be administrative since the difference in the actual testing requirements were included within the changes identified as L.2 and M.3, with the note providing clarification. The combination of the three changes listed above, which include a less restrictive, a more restrictive and an administrative change, provide a complete description of the changes from the CTS to the ITS relative to the startup range monitors.</p>

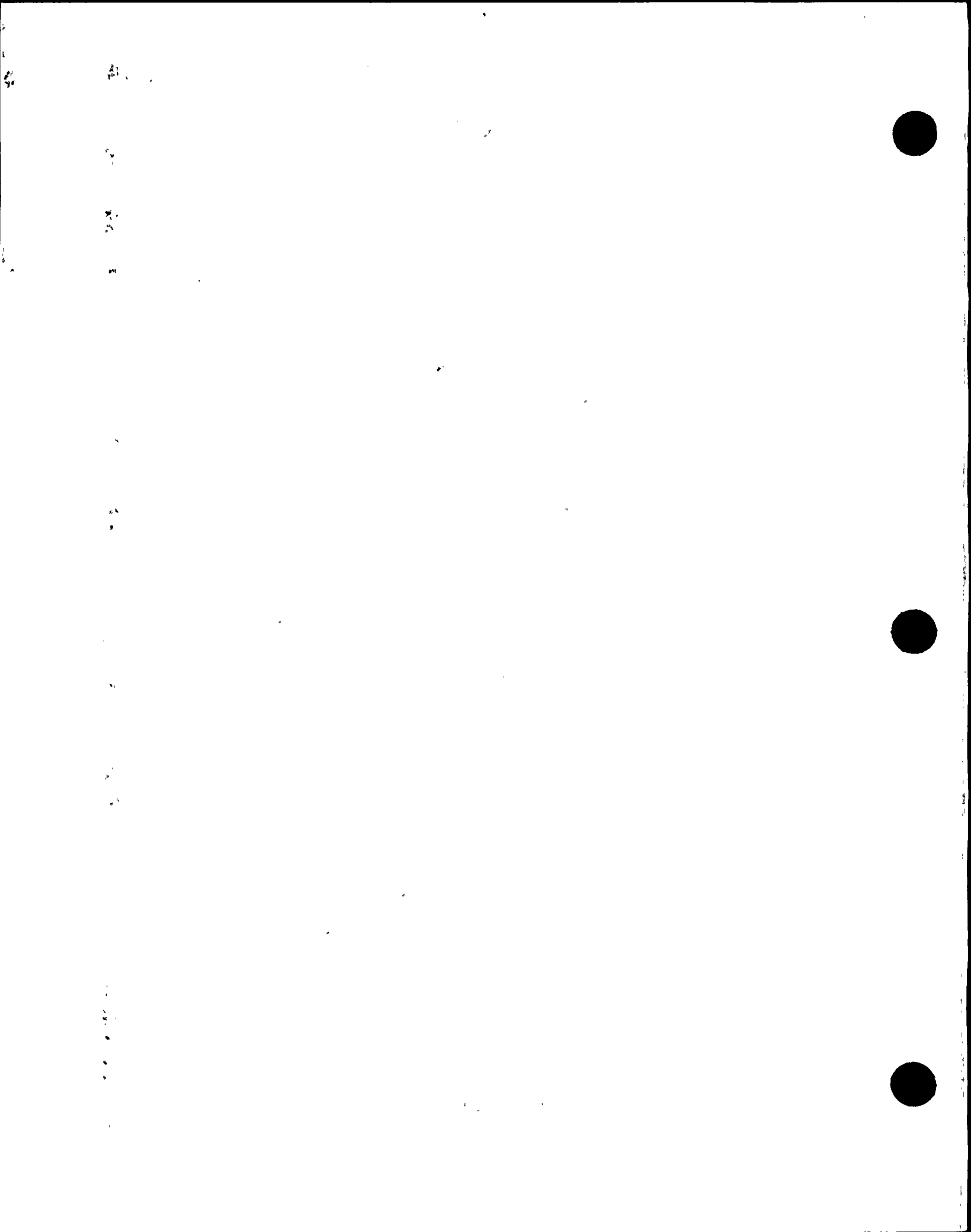
PVNGS ITS 3.9.2 NUCLEAR INSTRUMENTATION

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.2-4	L.2	CTS 4.9.2.b 4.9.2.c	<p>CTS 4.9.2.b and CTS 4.9.2.c require a CHANNEL FUNCTIONAL TEST within 8 hours prior to the initial start of Core Alterations, and at least once per 7 days. ITS 3.9.2 deletes the CHANNEL FUNCTIONAL TEST. The justification is not adequate to determine why the testing (during operation) accomplished by the CHANNEL FUNCTIONAL TEST surveillance is not required for the SRMs.</p> <p>Comment: Provide additional discussion and justification for the removal of the CHANNEL FUNCTIONAL TEST surveillance testing.</p>	See the response to issue number 3.9.2-3.



PVNGS ITS 3.9.3 CONTAINMENT PENETRATIONS

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.3-1	A.5	CTS 3.9.4.c.2	<p>CTS 3.9.4.c.2 requires containment penetrations be capable of being closed by an OPERABLE automatic containment purge valve. ITS 3.9.3.c.2 requires containment penetrations be capable of being closed by an OPERABLE Containment Purge <u>and</u> Exhaust Isolation System. The addition of the Exhaust Isolation System requirements is a More Restrictive change. There is no justification for this More Restrictive change.</p> <p>Comment: Provide discussion and justification for the More Restrictive change.</p>	<p>CTS 3.9.4.c.2 requires containment penetrations be capable of being closed by an OPERABLE automatic containment purge valve. At PVNGS this includes both the supply and the exhaust penetrations for the Containment Purge System. When the CTS refers to a purge valve it uses the terminology for the valves in both the supply <u>and</u> exhaust penetrations. The ITS uses the terminology "containment purge and exhaust system" to refer to a valve in both the supply and exhaust penetrations. Since the CTS and the ITS identify the same scope, which includes both the supply and exhaust penetrations, this is not a more restrictive change. It is classified as an administrative change covered under change A.1 and A.5.</p>



PVNGS ITS 3.9.3 CONTAINMENT PENETRATIONS

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.3-2	None	CTS 3.9.3 ACTION ITS 3.9.3 Condition A	CTS 3.9.3 ACTION states "With the requirements of the above specification not satisfied... ." ITS 3.9.3 Condition A states "One or more containment penetrations not in the required status." There is no discussion or justification for this More Restrictive change. Comment: Provide discussion and justification for the More Restrictive change.	The difference between the wording of the CTS and the ITS for specifications CTS 3.9.4 and ITS 3.9.3 was determined to be an administrative change and is covered under change number A.1. The "required status" of ITS 3.9.3 Condition A is defined in the ITS LCO for 3.9.3. The ITS LCO and the CTS LCO contain the same limitations and are equivalent except as noted in the CTS Markup. PVNGS has reviewed this change again and feels that this is appropriately classified as an administrative change and is not more restrictive. No additional action is needed for resolution of this comment.

PVNGS ITS 3.9.3 CONTAINMENT PENETRATIONS

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.3-3	None	<p>CTS 3.9.3 ACTION</p> <p>ITS 3.9.3 Condition A</p>	<p>CTS 3.9.3 ACTION states in part "... suspend all operations involving CORE ALTERATIONS <u>or</u> movement of irradiated fuel..." ITS 3.9.3 Required Action A.1 and A.2 states "Suspend CORE ALTERATIONS <u>and</u> Suspend movement of irradiated fuel assemblies within containment". There is no discussion or justification for this More Restrictive change.</p> <p>Comment: Provide discussion and justification for the More Restrictive change.</p>	<p>The CTS requires suspension of all operations involving CORE ALTERATIONS or movement of irradiated fuel. Suspension of all operations involving CORE ALTERATIONS or movement of irradiated fuel is equivalent to the ITS requirements. The ITS requires suspension of CORE ALTERATIONS and suspension of the movement of irradiated fuel assemblies within containment. The ITS format and wording are different than the CTS but each require suspension of both activities. Since the requirements of the CTS are the same as the ITS, the change was covered as an administrative change necessary for conversion to the format of the ITS under change A.1. No additional action is needed for resolution of this comment.</p>

PVNGS ITS 3.9.3 CONTAINMENT PENETRATIONS

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.3-4	None	CTS 4.9.9 ITS SR 3.9.3.2	<p>CTS 4.9.9 states in part "verifying that containment purge valve isolation... ." ITS SR 3.9.3.2 states in part "Verify each containment purge <u>and exhaust</u> valve... ." There is no discussion or justification for this More Restrictive change.</p> <p>Comment: Provide discussion and justification for this More Restrictive change.</p>	<p>CTS 3/4.9.9 is titled "Containment Purge Valve Isolation System." This includes both the supply and the exhaust penetrations for the Containment Purge System. When the CTS refers to a containment purge valve it uses the terminology for the valves in both the supply <u>and</u> exhaust penetrations. The ITS uses the terminology "containment purge and exhaust valve" to refer to the valves in both the supply and exhaust penetrations. Since the CTS and the ITS identify the same scope this is not a more restrictive change. It is classified as an administrative change covered under change A.1. No additional action is needed for resolution of this comment.</p>

PVNGS ITS 3.9.4 SHUTDOWN COOLING (SDC) AND COOLANT RECIRCULATION - HIGH WATER LEVEL

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.4-1	A.2	<p>CTS 3.9.8.1 ACTION</p> <p>ITS 3.9.4 RA A.1 and A.2</p>	<p>CTS 3.9.8.1 Action states in part, "... suspend all operations involving an increase in the reactor decay heat load <u>or</u> a reduction in boron concentration... ." ITS 3.9.4 Required Actions A.1 and A.2 require suspending operations involving a reduction in reactor coolant boron concentration <u>and</u> suspending loading of irradiated fuel assemblies in the core. This is a More Restrictive change rather than Administrative.</p> <p>Comment: Provide discussion and justification for the More Restrictive change.</p>	<p>The CTS requires suspension of all operations involving an increase in the reactor decay heat load or a reduction in boron concentration. Suspension of all operations involving an increase in the reactor decay heat load or a reduction in boron concentration is equivalent to the ITS requirements. The required action in the ITS is to suspend loading irradiated fuel assemblies in the core and to suspend operations involving a reduction in reactor coolant boron concentration. The ITS format and wording are different than the CTS but each require the suspension of both activities. Since the requirements of the CTS are the same as the ITS, the change was covered as a administrative change necessary for conversion to the format of the ITS under change A.1. No additional action is needed for resolution of this comment.</p>

PVNGS ITS 3.9.4 SHUTDOWN COOLING (SDC) AND COOLANT RECIRCULATION - HIGH WATER LEVEL

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.4-2	LA.2	CTS 4.9.8.1 ITS SR 3.9.4.1	New Issue	<p>ITS 3.9.4.1 requires that one SDC loop is in operation and circulating reactor coolant at a flow rate of greater than or equal to 3780 gpm. The quantitative value of the flowrate does not need to be specified in the SR but can be specified in the ITS Bases. The ITS Bases is controlled in accordance with the requirements of the ITS Bases Control Program in ITS Chapter 5.0 and 10 CFR 50.59. These provide an equivalent level of regulatory control. The relocation of the quantitative value of the flowrate to the ITS Bases is administrative in nature. This change does not impact the requirement to perform the surveillance or the frequency of performing the surveillance. This change is consistent with the format of ITS surveillance requirement 3.9.5.1, which also has the flowrate relocated to the ITS Bases. Refer to the response to issue number 3.9.5.3.</p>

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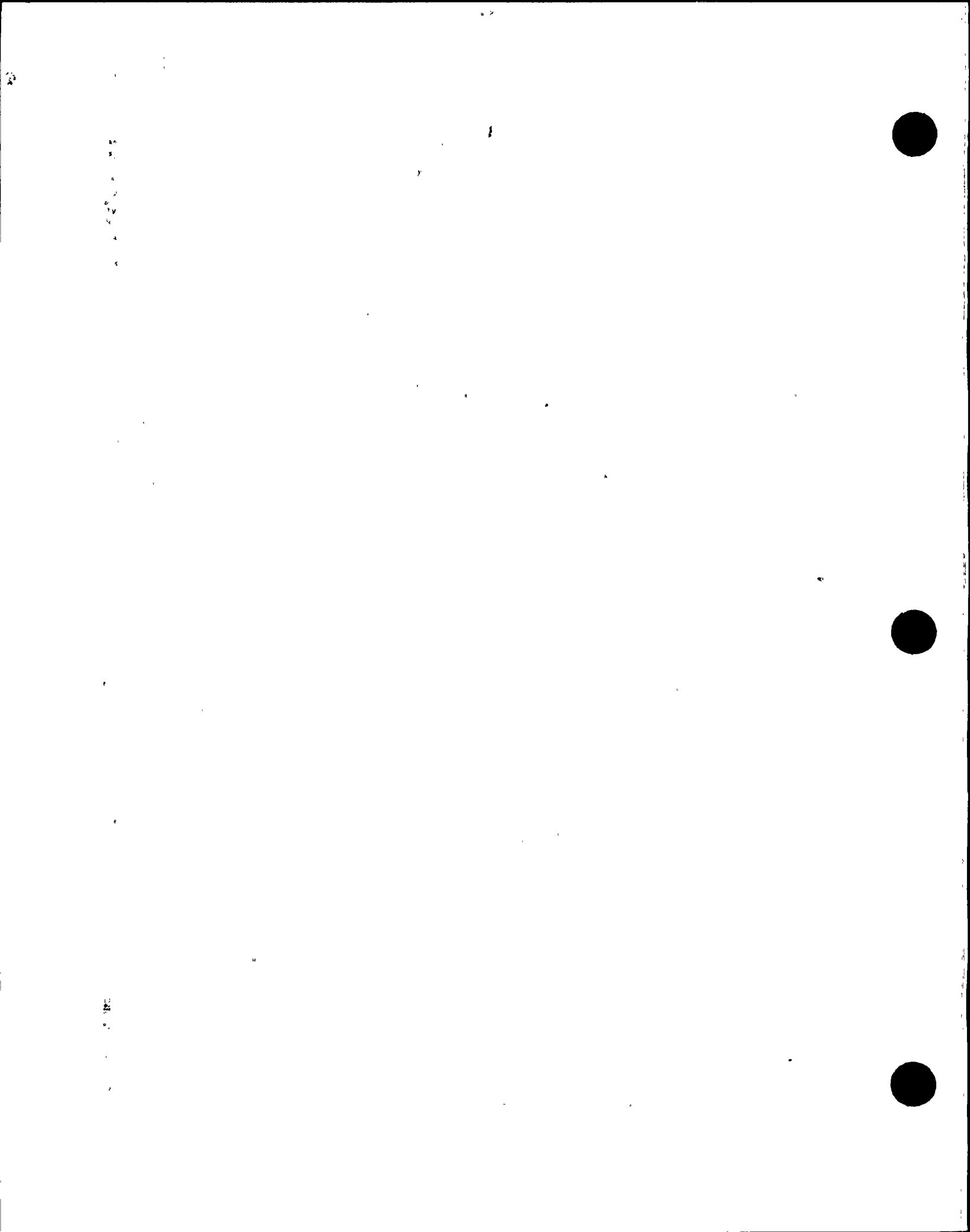
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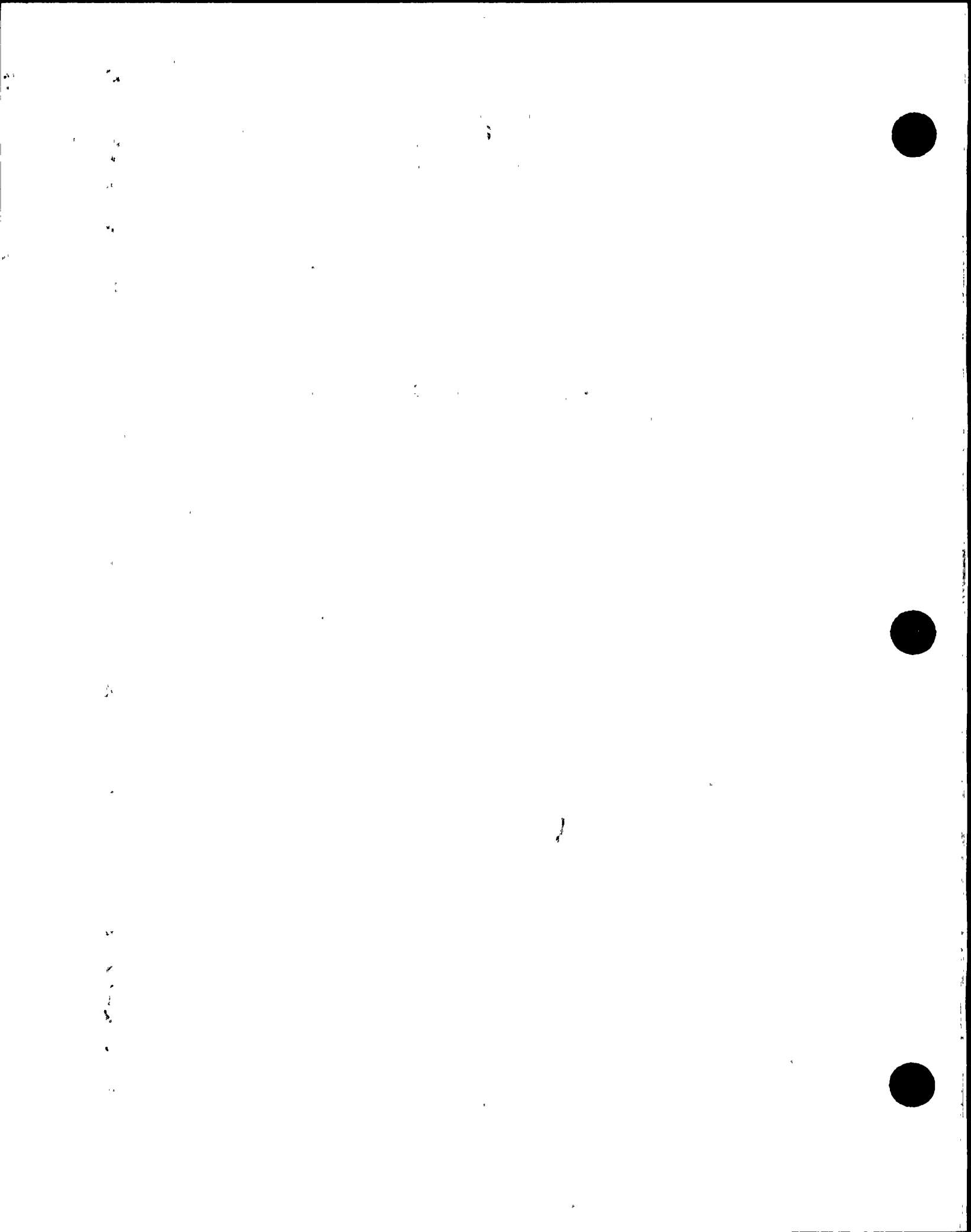
PVNGS ITS 3.9.5 SHUTDOWN COOLING (SDC) AND COOLANT RECIRCULATION - LOW WATER LEVEL

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.5-1	A.5	CTS 3.9.8.2 Action b	<p>CTS 3.9.8.2 Action "b" states in part, "With no shutdown cooling loop in operation, suspend all operations involving a ... reduction in boron concentration of the Reactor Coolant System..." ITS 3.9.5 Required Action B.1 requires that with no SDC loop Operable or in operation, immediately suspend operations involving a reduction in reactor coolant boron concentration. The justification states that CTS 3.9.8.2 Action "b" does not contain a completion time and is inadequate in using "intent" of the CTS as a bases for taking immediate action. This change results in a More restrictive change rather than an Administrative one.</p> <p>Comment: Provide justification for the More Restrictive change.</p>	<p>The CTS requirement states "suspend all operations involving ... reduction in boron concentration of the Reactor Coolant System..." This requirement does not specify a timeframe in which to accomplish the action. However, the lack of a specified timeframe does not indicate that a delay period is allowed prior to taking the action. The ITS has this requirement and uses the completion time of "immediately". In Section 1.3 of the ITS, it states that when the term "immediately" is used as a completion time, the required action should be pursued "without delay and in a controlled manner." Since the ITS and CTS both require the actions to be completed without delay they were determined to be technically equivalent and the change was classified as administrative. No additional action is needed for resolution of this comment.</p>



PVNGS ITS 3.9.5 SHUTDOWN COOLING (SDC) AND COOLANT RECIRCULATION - LOW WATER LEVEL

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.5-2	None	<p>CTS 3.9.8.2 Action a</p> <p>ITS 3.9.5 Required Action A.1 and A.2</p>	<p>CTS 3.9.8.2 Action "a" states in part "...or to establish greater than or equal to 23 feet of water above the reactor pressure vessel flange, as soon as possible. ITS 3.9.5 Required Action A.2 requires action to establish greater than or equal to 23 feet of water above the top of the reactor vessel flange immediately. No justification is provided for this More Restrictive change.</p> <p>Comment: Provide discussion and justification for this More Restrictive change.</p>	<p>The CTS requirement specifies the action needs to be completed "as soon as possible." PVNGS does not believe that the timeframe "as soon as possible" allows a delay period prior to taking this action. The ITS has this requirement and uses the completion time of "immediately". In Section 1.3 of the ITS, it states that when the term "immediately" is used as a completion time, the required action should be pursued "without delay and in a controlled manner." Since the ITS and CTS both require the actions to be completed without delay they were determined to be technically equivalent and the change was classified as administrative. Both CTS and ITS specify the requirement of 23 feet to be above the top of the reactor vessel flange. CTS 3.9.8.2 Action a does omit the words "top of" but since this requirement is clearly identified in the specification, this was treated as an administrative change covered under change number A.1. No additional action is needed for resolution of this comment.</p>



PVNGS ITS 3.9.5 SHUTDOWN COOLING (SDC) AND COOLANT RECIRCULATION - LOW WATER LEVEL

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.5-3	LA-1	CTS 4.9.8.2	<p>CTS 4.9.8.2 states in part, "At least one shutdown cooling loop shall be verified to be in operation and circulating reactor coolant at a flow rate of greater than or equal to 3780 gpm... ." ITS SR 3.9.5.1 requires verifying the required shutdown cooling loops are OPERABLE and one loop is in operation. The justification is inadequate in that it does not specifically state the "other surveillances which are required in operating Modes which verify OPERABILITY of the SDC pumps." The justification does not specify which procedure the information is moved.</p> <p>Comment: Provide discussion specifying the other Surveillance Tests which verify OPERABILITY of the SDC pumps. Also, specify the procedure to which the information is moved and the applicable controls applied.</p>	<p>In PVNGS letter number 102-03942 to the NRC dated May 30, 1997, PVNGS has provided a matrix of the relocated requirements identified during the ITS conversion. The letter also identifies the applicable controls that will be applied once the requirement is relocated. With respect to this specific comment, the requirement (LA.1 of ITS 3.9.5) is being relocated to the ITS Bases which will be controlled in accordance with the provisions of 10 CFR 50.59 and ITS 5.5.14, "Technical Specification Bases Control Program." ITS Bases section for SR 3.9.5.1 has been revised to contain the requirements identified in change number LA.1. Other surveillance requirements that address testing of the SDC pumps are SR 3.9.4.1, SR 3.4.6.1, SR 3.4.7.1, and SR 3.4.8.1. Refer also to the response to issue number 3.9.4.2.</p>



PVNGS ITS 3.9.6 REFUELING WATER LEVEL - FUEL ASSEMBLIES

ISSUE #	DOC OR JFD #	CTS/S TS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.6-1	JD1	STS 3.9.6	<p>STS 3.9.6 Applicability states in part "During CORE ALTERATIONS, except during latching and unlatching of control rod drive shafts,... ." ITS 3.9.6 modifies this Applicability stating "During movement of fuel assemblies within containment... ." The modification removes the CEA latching and unlatching exception. The removal justification (Specification 3.9.6, Exception 1) then states why CEA latching and unlatching cannot be performed with the water level required by this specification (which justifies leaving the exception in the Applicability). The justification is inadequate for the STS deviation.</p> <p>Comment: Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.</p>	<p>NUREG 1432, specification 3.9.6 requires the refueling water level to be maintained at least 23 feet above the top of the reactor vessel flange and is applicable for Core Alterations and for movement of irradiated fuel assemblies within containment. This specification accommodates a design where the CEA's and fuel assemblies are removed from the reactor vessel together. At PVNGS, the design is such that the CEA's are moved out of the reactor vessel separate from the fuel assemblies. Moving the CEA's out of the reactor vessel requires the use of a lifting rig and a work platform. In order to keep the work platform dry during movement of CEA's, the water level can not be raised to 23 feet above the top of the reactor vessel flange. If it is kept to 23 feet above the top of the fuel assemblies seated in the reactor vessel, the work platform can remain dry. Keeping the water level at 23 feet above the top of the fuel assemblies during movement of CEA's will ensure that the radiological consequences of a postulated fuel handling accident inside containment are within acceptable limits. Although NUREG specification 3.9.6 contains an exception for the latching and unlatching of control rod drive shafts (CEA's), it does not contain an exception for the movement of control rod drive shafts (CEA's). The PVNGS ITS provides a new specification number 3.9.7, "Refueling Water Level - CEA's." This specification requires the water level to be 23 feet above the irradiated fuel assemblies seated within the reactor vessel. The movement of CEA's and the CEA lift rig can then take place concurrent with raising the water level and prior to the water level reaching 23 feet above the top of the reactor vessel flange. The ITS specifications 3.9.6 and 3.9.7 are in accordance with the CTS for PVNGS. The format for the PVNGS ITS specifications 3.9.6 and 3.9.7 was taken from NUREG 1433, "Standard Technical Specifications for General Electric Plants BWR/4." No additional action is needed for resolution of this comment.</p>

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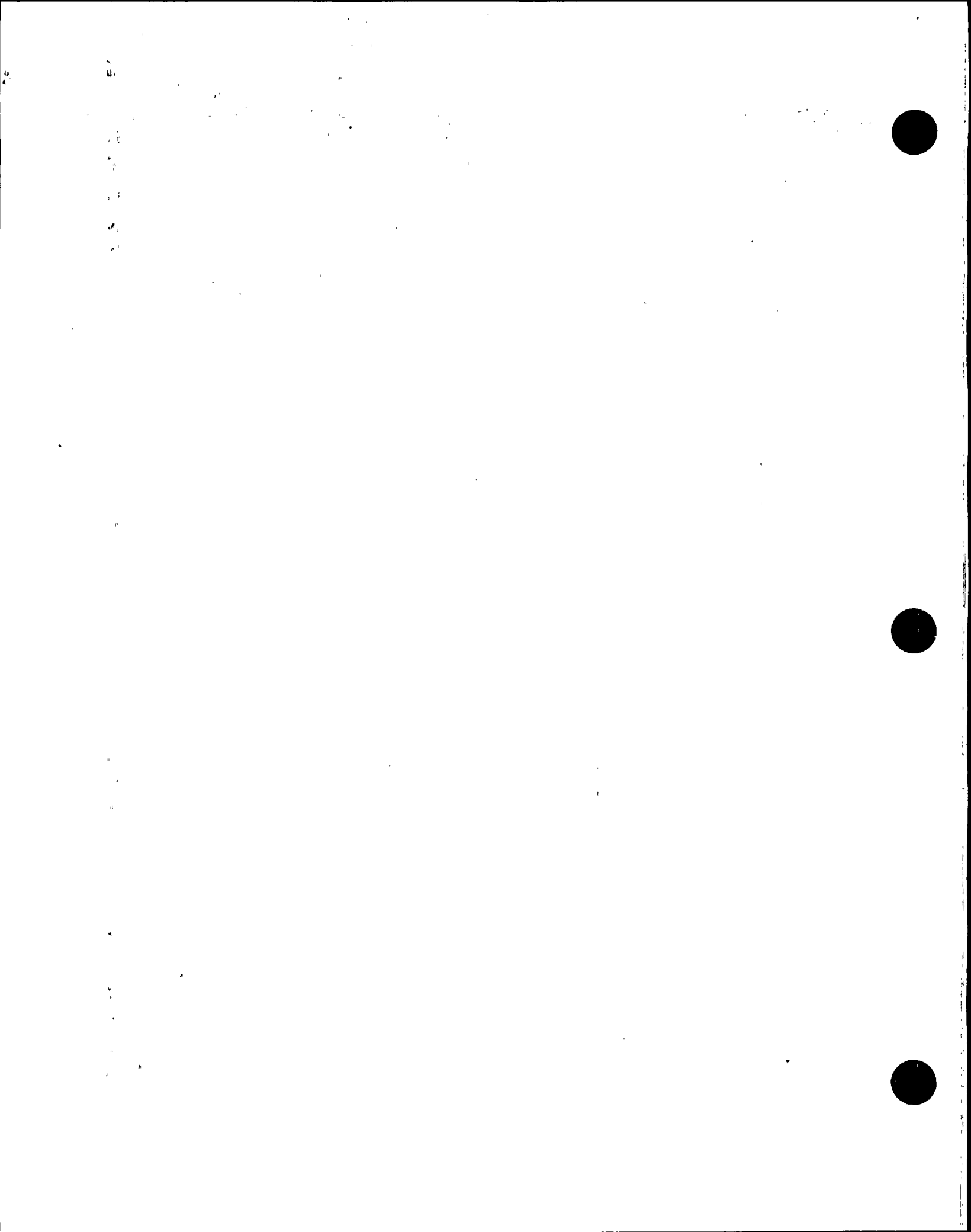


PVNGS ITS 3.9.6 REFUELING WATER LEVEL - FUEL ASSEMBLIES

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.6-2	None	STS 3.9.6	<p>STS 3.9.6 Applicability states "During CORE ALTERATIONS, except during latching and unlatching of control rod drive shafts, and during movement of irradiated fuel assemblies within containment." ITS 3.9.6 Applicability states "During movement of fuel assemblies within containment when either the fuel assemblies being moved or the fuel assemblies seated within the reactor vessel are irradiated." The deviation removes "Core Alterations..." and then adds "...when either the fuel assemblies being moved or the fuel assemblies seated within the reactor vessel are irradiated." No justification is provided for either STS deviation.</p> <p>Comment: Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.</p>	See response to issue number 3.9.6.1. No additional action is needed for resolution of this comment.

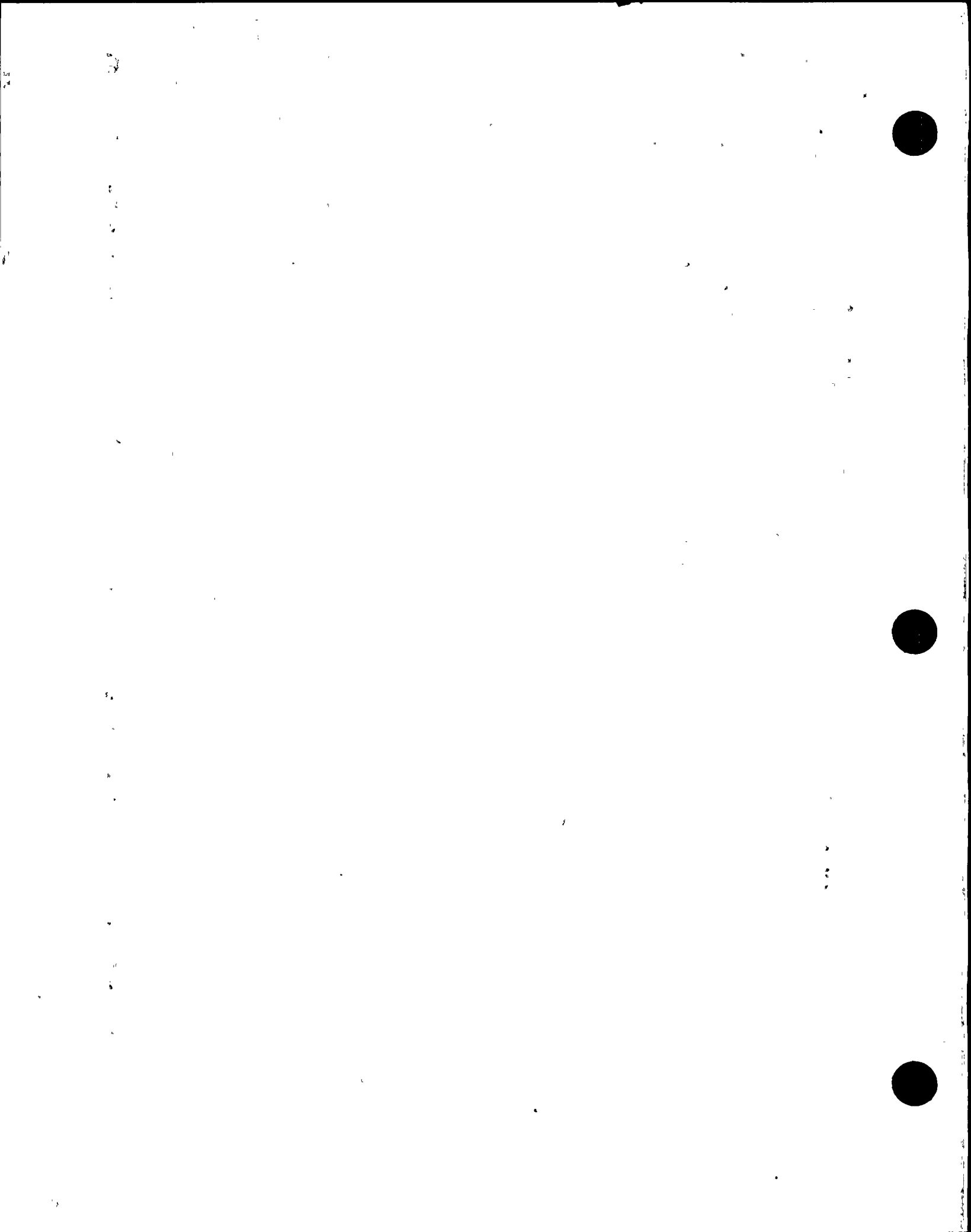
PVNGS ITS 3.9.6 REFUELING WATER LEVEL - FUEL ASSEMBLIES

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9.6-3	JD2	STS 3.9.6	<p>STS 3.9.6 Required Action A.3 states "Initiate action to restore refueling cavity water level to within limits." This Required Action is deleted from ITS 3.9.6 with justification stating the Applicability no longer applies after completion of Required Action A.2. The justification for deviation is adequate however, Specification 3.9.6 Exception 2 (Justification for Deviation) references submitted Generic Change TSTF-20.</p> <p>Comment: The NRC staff has approved Generic Change, TSTF-20.</p>	<p>The NRC staff has approved generic change TSTF 20. No additional action is needed for resolution of this comment.</p>



PVNGS ITS 3.9.7 REFUELING WATER LEVEL - CEAs

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
			No Issues or Comments.	No response required.



PVNGS ITS 3.9 RELOCATED SPECIFICATIONS

ISSUE #	DOC # OR JFD #	CTS/STS REF	DESCRIPTION OF ISSUE	PVNGS Response
3.9-1	R.1 R.2 R.3 R.4 R.5	CTS 3.9.3 CTS 3.9.5 CTS 3.9.6 CTS 3.9.7 CTS 3.9.12	<p>The stated CTS requirements are located to other plant documents outside of Technical Specifications. The justification does not state what documents these requirements are located to and does not state how these documents are controlled.</p> <p>Comment: Provide discussion stating the specific documents these requirements are located to and how these documents are controlled.</p>	<p>The specifications that were determined to not satisfy the requirements of 10 CFR 50.36 will be relocated to the Technical Requirements Manual (TRM). The TRM will be incorporated by reference into the UFSAR and controlled in accordance with the provisions of 10 CFR 50.59.</p>



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ENCLOSURE 2

ITS Section 3.9, "Refueling Operations"