GE Nuclear Energy

General Electric Company
175 Curtner Avenue, San Jose, CA 95125

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Docket No. STN 52-001

Chet Poslusny, Senior Project Manager
Standardization Project Directorate
Associate Directorate for Advanced Reactors
and License Renewal
Office of the Nuclear Reactor Regulation

Subject: Submittal Supporting Accelerated ABWR Review Schedule - **DFSER Technical Specification Items**

Dear Chet:

Attached are the responses to all of the DFSER Technical Specification Items.

Please provide a copies of this transmittal to SRXB, SPLB, ECGB and HICB.

Sincerely,

Jack Fox

Jack Fox
Advanced Reactor Programs

cc: Norman Fletcher (DOE)
Cal Tang (GE)

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GE Response on Tech Spec Items in ABWR Draft FSER

TS Item	Description	Response
3.9.6.2.4-1	Surveillances for pressure isolation valves	see ABWR Tech Specs, SR 3.4.4.1
4.4-1	RIP operating limits	see ABWR Tech Specs, LCO 3.4.1 - NOTE: GE has revised the approach to partial pump operation to require 9 or 10 RIPs in operation. With less then 9 RIPs in operation, continued plant operation will be appropriately limited.
5.2.3-1	Chemical control for primary coolant	Control of reactor coolant chemistry limits has been removed from the improved tech specs (NUREG-1433/1434) and thus will not be included in the ABWR tech specs. Such control is to be accomplished in the future via appropriate administrative controls outside of tech specs.
5.2.5-1	Limiting conditions for leakage	see ABWR Tech Specs, LCO 3.4.3 for actual RCS leakage limits and LCO 3.4.5 for operability of associated instrumentation.
5.4.6-1	ECCS functional testing	see ABWR Tech Specs, SRs 3.5.1.5, 3.5.1.6 & 3.5.1.7.
5.4.7-1	RHR	see ABWR Tech Specs, see LCO 3.5.1 and SRs 3.5.1.1, 3.5.1.2, 3.5.1.4 & 3.5.1.7
6.2.1.5.1-1	Inspection and testing of vacuum breakers	see ABWR Tech Specs, SRs 3.6.1.6.2 & 3.6.1.6.3
6.2.1.6-1	Suppression pool temperature limits	see ABWR Tech Specs, LCO 3.6.2.1
6.2.4.1-1	Allowable leak rates for isolation valves	see ABWR Tech Specs, SRs 3.6.1.3.7, 3.6.1.3.12 & 3.6.1.3.13
6.2.5-1	24-hour window at beginning/end of fuel cycle	see ABWR Tech Specs, SR 3.6.1.3.2 and LCO 3.6.3.2. - NOTE: The link between the large purge valves and the 24-hour window is only *implied* in that the valves are required to remain closed during MODES 1, 2 & 3 *except* when being used for inerting, de-inerting, etc. The 24-hour window is associated with the requirement for drywell oxygen concentration which is indicative of an inerted condition in the drywell.
6.3.3-1	ADS bypass timer periodic testing	see ABWR Tech Specs, LCO 3.3.5.1 & Table 3.3.5.1-1. ADS bypass timer testing is included in SRs 3.3.5.1.2, 3.3.5.1.3, and 3.3.5.1.4 because the timer is implemented in the SSLC, not a separate mechanical timer.
6.3.4.2-1	ECCS subsystems periodic testings	see ABWR Tech Specs, SRs 3.5.1.4, 3.5.1.5, 3.5.1.6 & 3.5.1.7.

6.3.5-1	Exposure-dependent APLHGR	see ABWR Tech Specs, LCO 3.2.1 - NOTE: The actual APLHGR limit is a fuel cycle specific value and under the improved tech specs will be included in the Core Operating Limits Report to be updated for each cycle
7.1.4-1	OPRM to be included in RPS tech specs	The OPRM scram setpoint is a new RPS input that will be included in LCO 3.3.1.1. Refer to Table 3.3.1.1-1 in LCO 3.3.1.1.
7.5.1-1	Accuracy requirements	Plant specific ABWR tech specs will specify "Allowable Values" that are calculated based on an approved setpoint methodology which includes consideration of required instrument accuracies. Since such determinations require as-built and/or as-procured information, they will be the responsibility of the COL holder once such information is available.
11.5.1-1	RMS alarms when rad levels exceed operating limits	Control of radwaste discharge limits has been removed from the improved tech specs (NUREG-1433/1434) and thus will not be included in the ABWR tech specs. Such control is to be accomplished in the future via appropriate administrative controls outside of tech specs.
14.2.10.1-1	RPV level/chemistry check before fuel load	RPV water level and chemistry checks are not specific tech spec items but will be included as specific prerequisites in the fuel loading procedure (see 14.2.12.2.3). Operability of required neutron instrumentation (including proper calibration) will be assured via LCO 3.3.1.3 which is required to be met prior to commencement of fuel loading (i.e., prior to entry into MODE 5).
14.2.12.4-1	RG 1.68, Position 2.c demonstration prior to fuel load	As stated, Section 14.2.12.2.3 specifically requires such demonstration prior to commencement of fuel loading. Furthermore, such demonstrations will be assured as part of the tech spec program (LCOs 3.3.1.1 & 3.3.1.2) which must be instituted prior to entry into MODE 5 (i.e., prior to commencement of fuel loading).
15.1-1	Availability, set points, surveillances of non-safety equipment	Operability of turbine bypass valves is assured by LCO 3.7.5. Operability of instrumentation for Level 8 trip and RPT will be assured by LCO 3.3.2.2 and LCO 3.3.4.1, respectively.
15.4.4.1-1	Suppression pool depth and DW leak-tightness	see ABWR Tech Specs, SR 3.6.2.2.1 & 3.6.1.1.1 for verification of suppression pool level (depth) and drywell leak tightness, respectively.
15.4.4.3-1	Post-LOCA leakage	Leakage from primary coolant sources outside containment is controlled administratively, through the program required by TS 5.7.2.4, required to be provided by the COL applicant as Section 5 of the ABWR Tech Spec is to be provided by the COL applicant.

15.5.1.2.1-1 (15.4.4.2.1-1)	Operability of drain valves	This valve is a pneumatically operated, normally closed, fail open valve. The valve is classified as ASME Category B, and is subject to the in-service testing (IST) program requirements of Section XI. As such, the valve is to be stroke tested at 3 month intervals (see SSAR Table 3.9-8 for Valve # B21-F017). This testing is sufficient to assure the valve's operability and thus further operability requirements via tech specs are not needed.
20.3-1	Outage times for ECCS components	This TS Item appears to be commentary regarding allowable outage times for ECCS and associated support systems and does not address any specific tech spec requirements. Furthermore, the Standard Tech Specs (NUREG-1433/1434) have no cumulative outage time limitations for ECCS. Such requirements are to be addressed outside of tech specs, for example, the Reliability Assurance Program.