February 22, 1994

Docket Nos. 50-416, 50-440
          50-458, 50-461

LICENSEES: Entergy Operations, Inc.
                    Cleveland Electric Illuminating Company
                    Illinois Power Company

FACILITIES: Grand Gulf Nuclear Station
                    River Bend Station
                    Perry Nuclear Power Plant
                    Clinton Power Station

SUBJECT: MEETING SUMMARY OF FEBRUARY 8-9, 1994

On February 8 and 9, 1994, representatives for the BWR/6 licensees and EG&G,
Idaho, met with members of the NRC staff at the Grand Gulf Nuclear Station in
Port Gibson, Mississippi, to discuss their planned conversions to the BWR/6
Improved Standard Technical Specifications (NUREG-1434). The list of
attendees and the handouts presented at the meeting are enclosed.

The purpose of the meeting was to discuss the results of the staff's review of
the second and third sequences of technical specification sections that make
up the conversion packages. The second sequence included Section 2.0, "Safety
Limits," Section 3.1, "Reactivity Control Systems," and Section 3.2, "Power
Distribution Limits." The third sequence included Section 3.8, "Electrical
Power Systems." The specific staff findings, as presented to the owners, are
included in the attached.

The next meeting, which will be at the River Bend Station in St Francisville,
Louisiana, has been rescheduled for March 22, 1994.

                              ORIGINAL SIGNED BY
                              Douglas V. Pickett, Lead Project Manager
                              Project Directorate III-3
                              Division of Reactor Projects III/IV/V
                              Office of Nuclear Reactor Regulation

Enclosures:
1. List of Meeting Attendees
2. Handouts

cc: See next page

DISTRIBUTION
See attached page

LA:PDIII-3   PM:PDIII-3   D:PDIII-3
MRushbrook   DPickett:dy   JHannon
2/ /94   2/22/94   2/2 /94

9403070279 940222
PDR   ADOCK 05000416
P   PDR

Mr. Richard F. Phares
Illinois Power Company

Clinton Power Station
Unit No. 1

cc:

Clinton Power Station
ATTN: Mr. Richard F. Phares
        Director - Licensing
Post Office Box 678
Mail Code V920
Clinton, Illinois 61727

Mr. J. S. Perry
Senior Vice President
Clinton Power Station
Post Office Box 678
Clinton, Illinois 61727

Mr. J. A. Miller
Manager Nuclear Station
  Engineering Department
Clinton Power Station
Post Office Box 678
Clinton, Illinois 61727

Resident Inspector
U.S. Nuclear Regulatory Commission
RR#3, Box 229 A
Clinton, Illinois 61727

Mr. R. T. Hill
Licensing Services Manager
General Electric Company
175 Curtner Avenue, M/C 481
San Jose, California 95125

Regional Administrator, Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

Chairman of DeWitt County
c/o County Clerk's Office
DeWitt County Courthouse
Clinton, Illinois 61727

Mr. Robert Neumann
Office of Public Counsel
State of Illinois Center
100 W. Randolph, Suite 11-300
Chicago, Illinois 60601

Mr. J. W. Blattner
Project Manager
Sargent & Lundy Engineers
55 East Monroe Street
Chicago, Illinois 60603

Illinois Department
  of Nuclear Safety
Office of Nuclear Facility Safety
1035 Outer Park Drive
Springfield, Illinois 62704

Mr. John R. McGaha

cc w/enclosure:
Winston & Strawn
ATTN: Mark J. Wetterhahn, Esq.
1400 L Street, N.W.
Washington, D.C. 20005-3502

Mr. Otto Bulch
Director - Nuclear Licensing
Entergy Operations, Inc.
River Bend Station
St. Francisville, Louisiana 70775

Mr. Philip G. Harris
Cajun Electric Power Coop, Inc.
10719 Airline Highway
P. O. Box 15540
Baton Rouge, Louisiana 70895

Senior Resident Inspector
P. O. Box 1051
St. Francisville, Louisiana 70775

President of West Feliciana
Police Jury
P. O. Box 1921
St. Francisville, Louisiana 70775

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 76011

Mr. J. David McNeill, III
William G. Davis, Esq.
Department of Justice
Attorney General's Office
P. O. Box 94095
Baton Rouge, Louisiana 70804-9095

Ms. H. Anne Plettinger
3456 Villa Rose Drive
Baton Rouge, Louisiana 70806

Administrator
Louisiana Radiation Protection Division
P. O. Box 82135
Baton Rouge, Louisiana 70884-2135

Mr. Harold W. Keiser
Executive Vice President and
  Chief Operating Officer
Entergy Operations, Inc.
P. O. Box 31995
Jackson, Mississippi 39286

Mr. Michael B. Sellman
Plant Manager
Entergy Operations, Inc.
River Bend Station
Post Office Box 220
St. Francisville, Louisiana 70775

Mr. James J. Fisicaro
Manager - Safety Assessment and Quality
  Verification
Entergy Operations, Inc.
River Bend Station
Post Office Box 220
St. Francisville, Louisiana 70775

Entergy Operations, Inc.
River Bend Station
ATTN: Mr. John R. McGaha, Jr.
        Vice President Operations
Post Office Box 220
St. Francisville, Louisiana 70775

Perry Nuclear Power Plant
Centerior Service Company

Unit Nos. 1 and 2

cc:

Mr. Robert A. Stratman
Vice President Nuclear - Perry
Centerior Service Company
P. O. Box 97, S270
Perry, Ohio 44081

Jay E. Silber, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N. W.
Washington, D. C. 20037

Mary E. O'Reilly
Centerior Energy Corporation
300 Madison Avenue
Toledo, Ohio 43652

Resident Inspector's Office
U. S. Nuclear Regulatory Commission
Parmly at Center Road
Perry, Ohio 44081

Regional Administrator, Region III
U. S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, Illinois 60532-4531

Lake County Prosecutor
Lake County Administration Bldg.
105 Main Street
Painesville, Ohio 44077

Ms. Sue Hiatt
OCRE Interim Representative
8275 Munson
Memtor, Ohio 44060

Terry J. Lodge, Esq.
618 N. Michigan Street, Suite 105
Toledo, Ohio 43624

Ashtabula County Presecutor
25 West Jefferson Street
Jefferson, Ohio 44047

Mr. Kevin P. Donovan
Cleveland Electric Illuminating
Company
Perry Nuclear Power Plant
P. O. Box 97, E-210
Perry, Ohio 44081

Jerry R. Williams, Chief of Staff
Ohio Emergency Management Agency
2825 West Granville Road
Worthington, Ohio 43085

Mr. James W. Harris, Director
Division of Power Generation
Ohio Department of Industrial
Relations
P. O. Box 825
Columbus, Ohio 43216

The Honorable Lawrence Logan
Mayor, Village of Perry
4203 Harper Street
Perry, Ohio 44081

The Honorable Robert V. Orosz
Mayor, Village of North Perry
North Perry Village Hall
4778 Lockwood Road
North Perry Village, Ohio 44081

Attorney General
Department of Attorney General
30 East Broad Street
Columbus, Ohio 43216

Radiological Health Program
Ohio Department of Health
Post Office Box 118
Columbus, Ohio 43266-0118

Ohio Environmental Protection
  Agency
DERR--Compliance Unit
ATTN: Zack A. Clayton
P. O. Box 1049
Columbus, Ohio 43266-0149

Mr. Thomas Haas, Chairman
Perry Township Board of Trustees
3750 Center Rd., Box 65
Perry, Ohio 4408'

State of Ohio
Public Utilities Commission
East Broad Street
Columbus, Ohio 43266-0573

David P. Igyarto, General Manager
Cleveland Electric Illuminating
  Company
Perry Nuclear Power Plant
P. O. Box 97, SB306
Perry, Ohio 44081

Mr. C. Randy Hutchinson
Entergy Operations, Inc.

Grand Gulf Nuclear Station

cc:

Mr. H. W. Keiser, Exec. Vice President
  and Chief Operating Officer
Entergy Operations, Inc.
P. O. Box 31995
Jackson, Mississippi 39286-1995

Robert B. McGehee, Esquire
Wise, Carter, Child & Caraway
P. O. Box 651
Jackson, Mississippi 39205

Nicholas S. Reynolds, Esquire
Winston & Strawn
1400 L Street, N.W. - 12th Floor
Washington, D.C. 20005-3502

Mr. Sam Mabry, Director
Division of Solid Waste Management
Mississippi Department of Natural
  Resources
P. O. Box 10385
Jackson, Mississippi 39209

President,
Claiborne County Board of Supervisors
Port Gibson, Mississippi 39150

Regional Administrator, Region II
U.S. Nuclear Regulatory Commission
101 Marietta St., Suite 2900
Atlanta, Georgia 30323

Mr. W. W. Watson
Project Manager
Bechtel Power Corporation
P.O. Box 808, 4600 W. Main
Russellville, Arkansas 72801

Mr. K. G. Hess
Bechtel Power Corporation
P. O. Box 2166
Houston, Texas 77252-2166

Mr. Rudolph H. Bernhard
Senior Resident Inspector
U.S. Nuclear Regulatory Commission
Route 2, Box 399
Port Gibson, Mississippi 39150

Mr. D. L. Pace
GGNS General Manager
Entergy Operations, Inc.
P. O. Box 756
Port Gibson, Mississippi 39150

The Honorable William J. Guste, Jr.
Attorney General
Department of Justice
State of Louisiana
P. O. Box 94005
Baton Rouge, Louisiana 70804-9005

Dr. F. E. Thompson, Jr.
State Health Officer
State Board of Health
P. O. Box 1700
Jackson, Mississippi 39205

Office of the Governor
State of Mississippi
Jackson, Mississippi 39201

Mike Moore, Attorney General
Frank Spencer, Asst. Attorney General
State of Mississippi
Post Office Box 22947
Jackson, Mississippi 39225

Mr. Jerrold G. Dewease
Vice President, Operations Support
Entergy Operations, Inc.
P.O. Box 31995
Jackson, Mississippi 39286-1995

Mr. Michael J. Meisner
Director, Nuclear Safety
  and Regulatory Affairs
Entergy Operations, Inc.
P.O. Box 756
Port Gibson, Mississippi 39150

DISTRIBUTION
*Docket Files: 50-416, 50-440, 50-458, 50-461
NRC & Local PDRs
*PDIII-3 r/f
TMurley/FMiraglia
LReyes, A/ADP
JRoe
JZwolnski
EAdensam
JHannon
SBlack
WBeckner
LMarsh
CGrimes
CSchulten
RSchaaf
PO'Connor
JHopkins
DPickett
MRushbrook
OGC
EJordan (MNBB 3701)
WDean (ED)(17-G-21)
EGreenman, RIII

*ENCLOSURE 2 to Docket Files, PDIII-3 r/f and DPickett only.

FEBRUARY 8 & 9, 1994

MEETING ATTENDEES

NRC

Carl Schulten

LICENSEES

Dale Sheldon, Illinois Power - Clinton
John Fowler, Entergy Operations - Grand Gulf
Bryon Ford, Entergy Operations - Grand Gulf
Mike Meisner, Entergy Operations - Grand Gulf
John Peters, Entergy Operations - River Bend
Charles Orogvany, Cleveland Electric - Perry

EG&G, IDAHO

Harold Oakes

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
1	CTS Section 1.1 Definitions for OPERATIONAL CONDITION and MODE and many applications all over Sections 2.0, 3.1, and 3.2	Delete definition for OPERATIONAL CONDITION, add the definition for MODE, and switch to the new applications over the whole CTS document.	A	x	x	x	x	Justification A.19, indicating consistency with the NUREG and for interchangeability of definition usage, provides adequate basis for this change. This justification is not marked or used for the same applications in the rest of the CTS document where specified, as if no change is involved. If to do this was a conscious decision, provide a statement in Justification A.19 to specifically support that action.	a	
2	CTS 2, 3.1, and 3.2	Relocate CTS requirement details to ITS Bases or to other specified licensee controlled documents or to both.	R	x	x	x	x	Many otherwise acceptable "L[x]" type justifications are really relocations of CTS details without being truly less restrictive for other reasons than just relocation. These must be changed to "R" type justifications and treated as such in the Discussion.	a	
3	CTS SL 2.1.2	Change pressure and flow operating regimes from ">" to "≥" for Thermal Power, High Pressure and High Flow.	L	x	x	x		Justification M.1 claims more restrictive operating regimes. However, increasing the regimes is actually less restrictive. Supply a Technical - Less Restrictive change and a safety basis justification.	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
4	ITS Bases B 2.1.2 for Applicable Safety Analyses and Safety Limits	Add specific recirculation system design pressure information.	P			x		Justification P.1 references "current Technical Specification Bases" as the source of the added information. This is not a valid reference, since formal "Technical Specification Bases" are not part of "current" licensing?	a	
5	ITS Bases B 2.1.2 for Applicable Safety Analyses and Safety Limits	Add specific recirculation system design pressure information.	C	x	x	x	x	Justification P.1 provides a plant specific license document reference for the change. The change is not, however, plant specific, but is a generic change to the NUREG. Submit a "C" type justification and a traveler to support this change.	a	
6	ITS Bases B 2.1.2 for Safety Limit Violations 2.2.2	Add information for consistency with the same section in B 2.1.1.	C	x	x	x	x	Submit a traveler to support the change to the NUREG spelled out in Justification C.14.	a	
7	ITS SL 2.2.4 and Bases B 2.1.1 and B 2.1.2 for Safety Limit Violations 2.2.4	Add CTS required "PORC" review to the LER requirements for a Safety Limit Violation.	P			x		"PORC" must be spelled out each time, since that is the first use of the acronym in each section.	a	
8	ITS Bases B 2.1.2 References	Change Reference 3 to provide the correct reference.	C	x	x	x	x	Provide a traveler to support the change to the NUREG specified in Justification C.15.	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated,
B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
9	ITS Bases B 2.0, B 3.1, and B 3.2 References	Add various topical reports to the current licensing basis to support plant specific analyses or parameters in the ITS.	P	x	x	x	x	Supply the reference to the NRC Staff licensing document that accepted each referenced topical report document as a valid plant specific reference for each such reference in the ITS.	a	
10	CTS 3.1	Add requirements that are in the NUREG.	M	x	x	x	x	Each additional requirement that is not in the CTS, but is in the ITS, must be shown and provided with an "M" type justification. Typically, this type of requirement is now listed as another type of justification that is not used at a given plant.	o	
11	ITS Bases B 3.1.1 for LCO and References	Delete Reference 5 and information about SWM safety design basis margin.	P	x		x		Justification P.5 says, "For the . . . specific licensing basis, neither Reference 5 or other references reviewed confirmed this 'design basis' bases." Reference 5 is to FSAR Section 4.3.2.4.1. This Clinton FSAR section references the same document listed as B 3.1.1 Reference 6 (Subsection A.4.3.2.4.1, therein), and this Perry FSAR section has the same information as the Grand Gulf UFSAR. The above Reference 6 section is the likely reference in the Clinton USAR and a highly possible one in the Perry USAR. Since this reference must meet NRC acceptance requirements, it certainly has the same information as the GGNS UFSAR. Therefore, B 3.1.1 Reference 6 is also valid for this case; the information cannot be removed, only the reference changed.	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
12	CTS LCO 3.1.1 Actions b. and c.	Change "establish [containment] within 8 hours" actions to new ITS requirements.	A				x	Justification A.4 must include references to new ITS Actions D.3 and E.4 (see ITS 3.1.1 Justification P.4).	a	
13	ITS LCO 3.1.1 Actions D.4 and E.5 and Bases B 3.1.1 for these Actions	Add plant specific information: "and secondary containment bypass."	P	x				Justification P.2 provides for only adding "and secondary containment bypass," but is used for making many more changes concerning secondary containment applications than just this. This is true in only the Bases sections. Revise the justification to include all these additional changes.	a	
14	ITS LCO 3.1.1 new Actions D.5 and E.6 and new Bases B 3.1.1 for these Actions	In the Bases, add Inserts B4A and B5A to provide information for the new Actions.	P	x				New Actions D.5 and E.6 allow the one required closed door in the upper primary containment air lock opened "during entry and exit under administrative control." (Emphasis added) Inserts B4A and B5A do not fully reflect this requirement. They say, "With the appropriate administrative controls, ..." (Emphasis added) This wording is unlike that of the LCO, since it can be viewed as, "We have them in place, but don't need to use them." Change the wording in the Bases inserts to agree with that of the LCO.	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
15	CTS and ITS Sections 1.1 Definitions for CORE ALTERATION, as referenced in CTS LCO 3.1.1 Action C and ITS LCO 3.1.1 Action E.1	In the CTS definition, add Insert 2A, the same as the third sentence in the ITS definition: "In addition, control rod movement with other than the normal control rod drive is not considered a CORE ALTERATION provided there are no fuel assemblies in the associated core cell."	L	x	x	x	x	CTS Justification L.4 describes a "physical removal" of the control rod, and supports any removal as not a CORE ALTERATION, with no fuel in that cell. However, the CTS change and the ITS definition imply use of the control rod drive (CRD) for rod removal is a CORE ALTERATION. This disallows CRD maintenance to continue when CORE ALTERATION must be ceased, surely not the intent of the change. Submit a generic change and a traveler to delete "with other than the normal control rod drive" from the ITS.	o	
16	ITS Bases B 3.1.1 for References	Change reference to NEDE-24011 to most recently approved revisions.	P			x		Justification P.3 says, "This comment is not used for this station." This is not correct, and must be changed to be like Clinton and River Bend.	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
17	CTS Surveillance Requirements 4.1.1 and 4.1.1 a. and Bases B 3.1.1 for LCO and SR 3.1.1.1	Address CTS requirement in the ITS.	R C	x	x	x	x	CTS Surveillance Requirement 4.1.1 a., "determined . . . by measurement," must be marked and supplied with an "R" type justification for its relocation to the ITS Bases. "Determined . . . by measurement" is not well covered in the ITS Bases. No specific mention of this CTS requirement or how it is performed exists. Words like "demonstrated by calculations not associated with a test," "demonstrated by testing," "demonstrated," "evaluation," and "demonstrations that rely solely on calculation," are used and can lead to misunderstanding. When changing the LCO area and moving and changing the "solely" statement in the SR area, ITS 3.1.1 Justification C.6 creates even more confusion. Make a generic change and submit a traveler to adequately cover this requirement.	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated,
B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
18	CTS Surveillance Requirements 4.1.1 and 4.1.1 b.; ITS LCO 3.1.1 and SR 3.1.1.1; and ITS Bases B 3.1.1 for these items	Address CTS requirement in the ITS.	C	x	x	x	x	CTS Surveillance Requirement 4.1.1, "at any time during the fuel cycle," remains, and Surveillance Requirement (SR) 4.1.1 b., to satisfy that requirement, is being deleted. Justification L.3 for deleting the SR says, in part, "The SDM limits adequately account for . . . fuel cycle changes . . . as determined by the initial startup test [required by SR 4.1.1 a.] . . . [as] supported in . . . NUREG-1434 . . .." This is true only when viewing the ITS Bases for the revised CTS SR 4.1.1 a. condition, but not the ITS LCO or SR. The human factor approach to the LCO and SR requires them to stand alone for basic applicable requirements, with the Bases providing greater definition. To satisfy the CTS SR 4.1.1 requirement "at any time during the fuel cycle," the LCO and the SR must include the fuel cycle limit. To avoid confusion and to meet this requirement, the best approach would be to add a third LCO limit, which factors in the first two and the fuel cycle adder, and a separate SR (for the third limit) with the present ITS second frequency, with adequate Bases to support them. Make a generic change and submit a traveler to adequately cover this requirement.	a	

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
19	ITS Bases B 3.1.2 for Background, Applicable Safety Analyses, LCO, and SR 3.1.2.1	Change "core k_{eff}" to "rod density."	P			x	x	Justification P.2 says, in part, "The wording is consistent with NUREG-1434." This is not the proper reference, otherwise no change would be needed. The correct reference is NUREG-1433.	a	
20	CTS Surveillance Requirement 4.1.2 b.	Change "31 EFPDs" to "1000 MWD/T."	L				x	The CTS wording to be changed needs proper marking.	a	
21	ITS LCO 3.1.2 and Bases B 3.1.2 for Surveillance Requirement SR 3.1.2.1	Add performing the surveillance after 1000 MWD/T "during operation in MODE 1."	C	x	x	x	x	Justification C.1 says the NUREG Bases reflects "the need to conduct the surveillance in MODE 1 (during POWER OPERATION)." The only Bases mention of power operation (in the second sentence of the first paragraph of BACKGROUND) does not specifically support this. Delete the reference to NUREG-1434 from the justification. In addition, Perry and River Bend must reference the CTS requirement.	a	
22	ITS Bases B 3.1.2 Background	Delete "and operating moderator temperature" from the second sentence in the third paragraph.	C	x	x	x	x	Provide a traveler to support the change to the NUREG spelled out in Justification C.3.	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Res...ctive, L = Technical/Less Restrictive, R = Relocated,
                  B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
23	CTS LCO 3.1.4.2 Action b.1	Delete optional allowed use of the rod gang drive system (RGDS) for bypassing an inoperable control rod.	L			x	x	Justification M.1 argues this is more restrictive. It is actually less restrictive, by removing from use the more restrictive of the two options. It is not a matter of decreasing the number of options, but remaining with the less restrictive one of the two. Supply a Technical - Less Restrictive change and a safety basis justification for this.	a	
24	CTS LCO 3.1.3.1 Actions a.1.a) and b.1.a)	Change Actions to Condition D in ITS LCO 3.1.3.	L	x	x	x	x	CTS Justification L.1 does not talk about deleting these Actions; the markups show only "Cond D." ITS Bases B 3.1.3 for Actions D.1 and D.2 says the BPWS analysis applies to "inserted" control rods: partially inserted (ITS LCO 3.1.3 Condition A result) and fully inserted (ITS Condition C result). Provide a generic change and a traveler to ITS Condition A and Condition C to contain the respective CTS Action to determine if ITS Condition D exists.	o	
25	CTS LCO 3.1.3.4 Action a.1.c)	Delete.	L				x	Justification A.4 needs to reference the correct number of the action (i.e., "a.1.c)", not "c").	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated,
                  B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
26	ITS LCO 3.1.3 Condition D and Bases B 3.1.3 for Required Actions D.1 and D.2	In the LCO, remove brackets around "10%." In the Bases, change "Below 10%" to "At $\leq$ 10%," in the second sentence.	C		x			Provide, as a reference in ITS Bases B 3.1.3, the licensing basis document (other than CTS LCO 3.1.4.2 Action b.3 and NEDO-21231) that adopts 10% RTP as the cutoff for applying Condition D. The three other plants do not have a similar CTS action, but use the same NEDO reference to make Condition D applicable up to 20% RTP. CTS 3.1.3.1 Justification L.1 for Control Rod Operability, and CTS 3.1.4.2 Justification L.1 for Rod Pattern Control System, when reviewed together, seem to make valid argument for the 10% RTP cutoff. On the other hand, the other three plants use the same wording to make the argument for 20% RTP cutoff. Without another licensing basis document than the NEDO document, a 10 CFR 50.59 issue appears evident for the lack of application of Condition D for 10 - 20% RTP.	o	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, S = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
27	ITS LCO 3.1.3 Condition D and Bases B 3.1.3 for Applicable Safety Analyses and Required Actions D.1 and D.2	In the LCO, remove brackets around "10%." In the Bases for the Required Actions, change "Below 10%" to "At ≤ 10%," in the second sentence.	C	x	x	x	x	CTS 3.1.3.1 Justification L.1, Section 1) discusses the application of ITS Condition D up to 10% RTP (other plants, 20%). It argues that, above that power, control rod worth of concern for the relevant accident is not possible; above 25% power, the effects of close inoperable rods are checked by the fuel thermal limits; and, between these power levels, sufficient margin exists for adequate protection. It concludes, "Therefore, adequate limits to control core reactivity and power distribution above 10% [others, 20%] power remain with this proposed change." The Bases B 3.1.3 for Applicable Safety Analyses and Actions D.1 and D.2 must mention and justify these arguments, including the specific margin(s), for not extending the applicability beyond that stated. Also, proper arguments must justify why not extending to 25% RTP, where the fuel thermal limits take over. Submit a generic change and a traveler, as needed, to make these changes to the ITS.	o	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
28	ITS LCO 3.1.3 Condition D and Bases B 3.1.3 for Required Action D.2	Change Condition D and the Bases, from "One or more" to "Two or more," for the number of inoperable control rods not complying with BPWS and not separated by two or more OPERABLE control rods.	C	x	x	x	x	Justification C.5 says, in part, "Since . . . separation [is involved], one inoperable control rod is inherently not at issue." In "one or more," the motive force for separation is "more." Required Action (RA) D.2, reflecting only the "one" condition, is open to interpretation. "Two or more" shifts the emphasis, but the "or more" and the unchanged RA invite even more interpretation. The Bases invites still more by stating in part, "or restore the control rods to OPERABLE status." (Emphasis Added) Submit a generic change and a traveler to: 1) Change Condition D to read, "Two inoperable control rods . . . .." 2) Change RA D.2 to read, "Restore one control rod to OPERABLE status." 3) Change B 3.1.3 to be like items 1) and 2).	a	
29	CTS Surveillance Requirement 4.1.3.1.2a.	Change marked on the 7-day surveillance frequency and designated as "A9". (The other plants designate this change as "L7" and provide adequate justification as a Technical Change - Less Restrictive for a 31-day frequency on rods not full out.)	L		x			Justification A.9 and the markup do not explain or show what is the change to the frequency. The justification merely identifies the source document as a letter to the NRC and says the change is considered administrative, without explanation. Provide a specific Technical - Less Restrictive change and a safety basis justification explaining the change.	o	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
30	ITS Bases B 3.1.3 for References	Mark and, as applicable, change Reference 7.	P			x	x	Justification P.3, dealing with the nonapplicability of ITS Condition E for GE fuel, is shown as affecting Reference 7: for Perry, no change; for River Bend, brackets are placed around "Section 7.2, January 1977." It contains no reason for each, and appears to not be applicable.	a	
31	ITS LCO 3.1.4 b. and ITS Bases B 3.1.4 for LCO	Remove the NUREG presentation not allowing "more than 2" adjacent slow control rods.	C	x	x	x	x	Justification P.3, described as a "Plant Specific Difference," is not valid, since all plants are making these changes. Supply a generic change and a traveler to make them in the NUREG.	a	
32	ITS Bases B 3.1.4 for LCO	Parenthetical statement defining the number of slow control rods.	C	x	x	x	x	The parenthetical statement "(e.g., [numbers of control rods])" is not one of example. It defines specific numbers, hence must begin with "i.e." Submit a generic change and a traveler to make this change in the NUREG.	a	
33	ITS Bases B 3.1.4 for LCO	Change numbers of control rods to reflect plant specific design.	P	x		x	x	Justification B.1 for removing brackets and revising optional wording is not valid for this change, since brackets and optional wording do not exist at this point in the NUREG. Provide a "P" type justification.	a	
34	CTS Surveillance Requirement(s) 4.1.3.2	None	A	x	x	x	x	Explain how the CTS requirement "[demonstrate] by measurement" is captured in the ITS SRs.	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated,
                 B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
35	CTS Surveillance Requirement (CPS) 4.1.3.2.1 b. and (Others) 4.1.3.2 c.	Remove representative sampling details to plant procedures and summary to the Bases.	L	x	x	x	x	Justification LA.1 does not distinctly address "on a rotating basis" and how it applies in the ITS Bases. The CTS "shall" requirement is an ITS "should" recommendation and in all other words.	a	
36	CTS Surveillance Requirement 4.1.3.2 b. and Footnote *	Replace with ITS SRs 3.1.4.3 and 3.1.4.4.	L		x	x	x	Justification M.1 is not valid for replacing with these two SRs. Taken together, the two SRs are nearly equal to the CTS requirement coupled with the Specification 4.0.4 nonapplication statement. Each way demonstrates OPERABILITY at ≥ 950 psig RCP, but the former way requires completion before entry into Operational Condition 1; the new way, before exceeding 40% RTP in Mode 1. Thus, the change is less restrictive.	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
37	CTS Surveillance Requirement 4.1.3.2.2 and Footnote *	Delete Specification 4.0.4 nonapplication, require the currently alternative test at < 950 psig RC^ and its required followup at ≥ 950 psig, and remove to plant procedures the specified 0-psig-to-950-psig RCP limit interpolation requirement.	L	x				Justification M.1 is not valid: ITS SRs 3.1.4.3 and 3.1.4.4 merely make the CTS's alternative/may method a requirement, replacing the need for the former required way coupled with the Specification 4.0.4 nonapplication statement. This replacement is thus less restrictive: the former way required completion before entry into Operational Condition 1; the new way, before exceeding 40% RTP in Mode 1. Justification LA.2 must give a technical justification for removing this acceptance criterion. It must not credit the ITS as the source of this criterion in the CTS or as the entity that proposes to remove the criterion to plant procedures. Neither must it base removal on other BWRs not having this criterion.	a a	
38	ITS LCO 3.1.4 Table 3.1.4-1 and ITS Bases B 3.1.4 for Surveillance Requirement 3.1.4.3	In the Table, delete the 0-psig column, relocate the footnote (b) callout, and revise footnote (b) to discuss <950 psig pressure conditions. In the Bases, add an explanation for the <950 psig conditions.	L & C	x	x	x	x	Justification C.5 proposes to relocate the 0-psig data to plant procedures, but leave SR 3.1.4.3, and makes "Portions of the Bases" agree with these changes. Submit a generic change and a traveler to change the table, the footnote, and the Bases to specify how the SR "any . . . pressure" limits are set "within established limits" for the SR.	o	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated,
                  B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted r = rejected m = modify o = open item

NUM	CHANGE	DESCRIPTION	T Y P E	GENERIC				JUSTIFICATION/CONCLUSION	C O D E	A P L
				C	G	P	R			
39	ITS Bases B 3.1.4 for Surveillanc e Requirement 3.1.4.2	Add information to clarify representative sampling requirements.	C	x	x	x	x	Justification C.8 says, "Clarification necessary to avoid mis-reading the statement . . .." In the newly added parenthetical statement, "(e.g., 20% of the entire sample size)," the use of the introduction "e.g.," or "for example," is open ended and leaves the user wondering about the full intent of the requirement. Provide a generic change and a traveler changing "e.g.," to "i.e.," meaning "that is," and being all inclusive.	a	
40	CTS LCO 3.1.3.3 Action a.1; ITS LCO 3.1.5 Actions Conditions A, B, and C; and Bases B 3.1.5 for Actions A.1 & A.2, B.1, B.2.1, & B.2.2, and C.1 & C.2	Make all LCO Actions conditioned on "reactor steam dome pressure ≥ 600 psig."	L & C	x	x	x	x	Justification M.1 for the CTS does not give a specific value for "At reduced reactor pressures," but adding the stated pressure condition makes it a Technical - Less Restrictive change. (CTS Action A.1 is not so conditioned, thus applies to all pressures in Operational Conditions 1 and 2.) Provide a specific Technical - Less Restrictive change and a safety basis justification explaining the change. For the ITS LCO, Justification B.1 changes the bracketed "900" to "600." In the ITS Bases, Justification P.3 makes a similar, unbracketed change. These justifications would be valid if up to three plants made these changes. Since all four plants are doing this, submit a generic change and a traveler for all these changes to the NUREG.	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated,
                       B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
41	CTS Bases B 3.1.5 for Surveillance Requirements	Delete "to 2000 psig."	C	x	x	x	x	Justification P.4 is common to all four plants, thus is not valid. Supply a generic change and a traveler for this change to the NUREG.	a	
42	CTS LCO 3.1.4.2	Move specified requirements to LCO 3.3.2.1	C	x	X	x	x	Justification A.2 for GGNS moves specified requirements to other areas of the ITS and says changes to them are addressed with the content of the new area. Actions b.3.c) and b.3.e) are marked as SR (Surveillance Requirement) 3.3.2.1.9. Rather than the $\leq 10\%$ RTP application of these actions, the Bases for LCO 3.3.2.1, wherein SR 3.3.2.1.9 is discussed, makes the applicability and operability of the banked position withdrawal sequence (BPWS) to $\leq 20\%$ RTP, without noting the change in the CTS. Neither is that change translated to ITS LCO 3.1.3 Actions Condition D dealing with the separation of inoperable control rods not in compliance with BPWS, and ITS LCO 3.1.6 for the application of OPERABLE control rods to BPWS, both of which remain at $\leq 10\%$ RTP. Since all plants will now be making this change in the ITS, provide a generic change and a traveler to change every BPWS applicability and operability connection in the ITS to $\leq 20\%$ RTP.	o	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
43	ITS LCO 3.1.6 Applicability and Bases B 3.1.6 for Background, Applicable Safety Analyses, Applicability, Actions A.1 and A.2, and References	In the LCO and in the Bases Background and Actions A.1 and A.2, remove the brackets from around and, as needed, make plant specific changes to "10%." In the Bases Background, Applicable Safety Analyses, Applicability, and References, make plant specific reference numbering changes to appropriately support that power level.	P	x	x	x	x	Supply the reference to the NRC Staff licensing document that accepted the BWR Owners Group (new ITS Bases Reference 1) document as a valid plant specific reference in the ITS. Show in the appropriate Bases section(s) how it specifically accepted the $\leq 10\%$ power level applicability of low power set point of the Rod Pattern Control system. One other plant uses the same reference, again without an acceptance reference, to support 20%; the others use two other different references (one as new Reference 9) to support 20%, the other of which is not a valid reference without a primary licensing document to accept or support this power level. Supply a generic change and a traveler, as needed, to make these changes to the ITS Bases.	o	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
44	CTS LCO 3.1.4.2 and ITS LCO 3.1.6 Applicability and Bases B 3.1.6 for Background	Add LCO 3.1.6.	C	x	x	x	x	CTS 3.1.4.2 Justification L.1d proposes that ITS LCO 3.1.6 have a "specific requirement for control rods to be in compliance with the BPWS during operation," as follows: 1) Grand Gulf and River Bend, "at low power," and 2) Clinton and Perry, "below the Low Power Setpoint." The LCO 3.1.6 Applicability for Grand Gulf is set at $\leq$ 10% RTP and for the rest, at $\leq$ 20% RTP. The Bases B 3.1.6 Background for Grand Gulf has a stated application of "to 10% RTP," while the others change that statement to read, "up to the low power setpoint (LPSP)." CTS SR 4.1.4.2 a.2, marked to move to ITS SR 3.3.2.1, for both Grand Gulf and River Bend show the LPSP to be "20 +15, -0%" of RTP. Provide a consistent change justification for the CTS and a generic change and a traveler to make the ITS the same.	o	
45	ITS Bases B 3.1.6 for References	Delete Reference 1 to the "Current Cycle Safety Analysis."	C	x	x	x	x	Justification P.1 is used by all four plants to make this deletion and is, therefore, invalid. Provide a generic change and a traveler to make this change in the NUREG.	a	
46	CTS LCO 3.1.5 Action	Add new Condition A.	M				x	Justification L.8 provides adequate reason for adding this new condition, but presents the addition as less restrictive. On the contrary, this change is more restrictive. It must be presented as Technical - More Restrictive for proper justification.	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
47	ITS LCO 3.1.7 new Required Action A.1	Add plant specific requirements.	B		x			Justification B.1 removes brackets and revises optional wording. Make the new required action include a reference to the plant specific temperature limits in Table 3.1.7-1, as stated in the CTS.	o	
48	ITS LCO 3.1.7 and Bases B 3.1.7 for Actions Condition A and Required Action A.2	Add plant specific parameters.	B		x			Justification B.1 removes brackets and revises optional wording. Justification P.9 states, "The Bases are revised to be consistent with the LCO." Make the changes for the unit of measure contain the CTS requirement for weight percent.	o	
49	ITS Bases B 3.1.7 for Required Action A.2	Add Insert B38A.	P		x			Change Insert B38A to require adherence to the initial-capped "Figure 3.1.7-1," typical of all other references to specific figures in the ITS, rather than "figure 3.1.7-1."	o	
50	Bases B 3.1.7 for Required Actions A.2 and B.1	Add Inserts B39A and B39B.	C		x		x	Change Inserts B39A and B39B to say, "The 10 day Completion Time is an acceptable limit . . .." (emphasis added). (A limit is an outside imposed restriction; a limitation is an inherent maximum.)	o	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
51	CTS Surveillance Requirements 4.1.5 a.2 and b.2; ITS SR 3.1.7.1 and SR 3.1.7.5; and ITS Bases B 3.1.7 for these SRs	Make ITS include CTS requirements.	P				x	Justifications B.1, P.3, and P.5 make plant specific changes to the ITS to meet the CTS. Some CTS requirements, however, are not captured. To meet the CTS, make the B.1 change read, "$\geq$ the minimum required available volume"; the P.3 Note read, "The minimum required available volume is determined in SR 3.1.7.5"; and the P.5 change read, "Verify the . . . lbs and the . . . weight, and determine the . . . volume." (Emphasis Added) The Bases must discuss these items, including the general method for determining the minimum required solution volume and how "available" volume equates to "solution" volume.	o	
52	CTS Surveillance Requirements 4.1.5 b.4 and Footnote **; ITS SR 3.1.7.3; and ITS Bases B 3.1.7 for this SR	Make ITS include CTS requirements.	P				x	Justifications P.4 and P.5 make plant specific changes to the ITS to capture CTS requirements. The ITS changes do not fully do this. To capture all CTS requirements, make the second sentence in the Note in Insert 22A read, ". . ., is determined in SR 3.1.7.9" and make CTS Footnote ** into SR 3.1.7.9. (Emphasis Added) Also, the Bases must discuss these things, and must not discuss removed items (vestiges of former SRs 3.1.7.3 and 3.1.7.10 remain or were relocated to this area).	o	

CHANGE TYPES:
A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated,
B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
53	Bases B 3.1.7 for Surveillance Requirements SR 3.1.7.1, SR 3.1.7.2, and SR 3.1.7.3	Add a reference to include all the SRs in the parenthetical statement.	P	x	x	x	x	Adding the third SR to the first two or deleting the third SR in the LCO makes the parenthetical statement all inclusive. Change the introduction to be "i.e.," rather than "e.g.,".	a	
54	CTS Surveillance Requirement 4.1.5 b.1.	Delete this requirement.	L		x			Justification LA.1 which states, "The method of performing the surveillance test is relocated to plant procedures," is not valid. The other 31-day surveillances do not depend on performing this SR for their completions. Submit a less restrictive change and a safety basis justification for deleting this SR.	a	
55	ITS LCO 3.1.7 Surveillance Requirement SR 3.1.7.5	Remove brackets from around "within the limits of Figure 3.1.7-42."	B	x	x	x		Justification B.1 removes brackets and revises optional wording. The change does not revise the wording to reflect the CTS requirement of "by chemical analysis." Provide either a generic change and a traveler to change the ITS to include this wording or mark up the CTS with Justification LA.1 as the method of performance, to relocate it to plant procedures.	o	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES:

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
56	ITS LCO 3.1.7 Surveillance Requirement SR 3.1.7.6	Remove brackets from around "and automatic valve."	B	x	x	x	x	Justification B.1 removes brackets and revises optional wording. The change does not revise the wording to reflect the CTS requirement of "or automatic." A "manual, power operated, and automatic" valve does not exist; only one type in any given instance. Submit a traveler and a generic change to the ITS, as shown in the CTS "or automatic," the only correct use for "each valve."	a	
57	ITS LCO 3.1.7 SR 3.1.7.6 and Bases B 3.1.7 for Applicable Safety Analyses and Action B.1	Make an "obvious editorial correction," as noted on each page.	C	x	x	x	x	Provide a traveler to support these changes to the NUREG as stated in Justification C.5.	a	
58	ITS Bases B 3.1.7 for Actions A.1 (new)	Add information to support this action.	P		x			Justification P.9 says, "The Bases are revised to be consistent with the LCO." While this is adequate justification, make the change mention the increased time of 4 hours and explain why that frequency is acceptable. These are two of the requirements the Bases must include for completeness.	o	
59	CTS LCO 3.1.3.1 Actions d. and e.	Add a note "to periodically permit opening the affected [SDV] line for draining and venting.	L			x		Justification L.6 requires this note added, but none is shown in the CTS or in the ITS LCO 3.1.8. Provide this note as another "L6" markup to the CTS and as a "P" type change to the ITS.	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated,
B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES:

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
60	ITS Bases B 3.1.8 for Surveillance Requirement SR 3.1.8.3	Add title of LCO 3.1.3 in the callout.	C	x	x	x	x	Supply a traveler to support the change to the NUREG spelled out in Justification C.5.	a	
61	CTS LCO 3.2.1 Action	Delete loop operation specifications, "During two loop operation or single loop operation,".	A		x			Submit a Technical - Less Restrictive change and a safety basis justification for deleting the loop operation specifications.	a	
62	ITS Bases B 3.2.1 for Applicable Safety Analyses	Delete the second sentence of the second paragraph, "APLHGR limits are equivalent to the LHGR limit . . . ."	C	x	x	x	x	Provide a traveler to support the change to the NUREG specified in Justification C.4.	a	
63	ITS Bases B 3.2.1 for Applicable Safety Analyses and LCO	In ASA Section, add COLR reference in the next to last paragraph. In LCO, add COLR reference for single loop operation.	C	x	x	x	x	Submit a traveler to support these changes to the NUREG stated in Justification C.5.	a	
64	ITS Bases B 3.2.1 and B 3.2.2 for Applicability	Delete "not specifically applicable in the context presented" references.	C	x	x	x	x	Justification P.11 provides a plant specific reason for the change. This is not plant specific, but is a generic change to the NUREG. Submit a "C" type justification and a traveler to support this change.	a	
65	ITS Bases B 3.2.1, B 3.2.2, and B 3.2.3 for Actions	Delete or modify plural usages.	C	x	x	x	x	Provide a traveler to support these changes to the NUREG specified in Justification C.6.	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated,
                   B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
66	ITS Bases B 3.2.2 for Applicable Safety Analyses	Add a respective parenthetical reference to MCPR, in the first sentence of the second paragraph of the ASA section, at the top of pg 26.	P		x			Justification P.12 makes appropriate Bases revisions for plant specific parameters. Make the part in parentheses read "MCPR, MCPR, and MCPR, respectively" to match the sentence structure and have proper punctuation for readability.	a	
67	ITS Bases B 3.2.2 for Applicable Safety Analyses	Consistent information presentation for user friendly readability and application.	C	x	x	x	x	A new paragraph should begin with the second sentence in the first paragraph at the top of pg B 3.2-6. That sentence should have "(MCPR,)" after "limits" to agree with the next MCPR discussion(s) in the following paragraph(s). Submit a generic change and a traveler to include and justify these changes.	a	
68	ITS Bases B 3.2.2 for Applicability and References	Delete discussion and reference to "the nominal value of the initial MCPR expected at 25% RTP."	C	x	x	x	x	Justification P.8 says, "This information could not be substantiated and is proposed to be deleted. The reference will also be deleted since this is the only use." This is not plant specific, but is a generic change to the NUREG. Provide a "C" type justification and a traveler.	a	
69	ITS Bases B 3.2.2 and B 3.2.3 for References	Additions to complete/correct references.	C	x	x	x	x	Provide a traveler to support these changes to the NUREG stated in Justification C.1.	a	
70	ITS Bases B 3.2.3 for Surveillance Requirements	Change singular to plural references to LHGR and its usage.	C	x	x	x	x	Submit a traveler to support these changes to the NUREG specified in Justification C.8.	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

BWR/6 TECHNICAL SPECIFICATION CONVERSION REVIEW DATA

NUM	CHANGE	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
				C	G	P	R			
71	CTS Surveillance Requirement 4.2.2	Relocate APRM flow biased neutron flux-upscale control rod block trip setpoint application.	R				x	Justification R.1 justifies the noted requirement's relocation, but is not used to mark up the SR.	a	
72	CTS Surveillance Requirements 4.2.2 a., b., and c.	Capture CTS requirements in the ITS.	C				x	Justification C.2 only mentions the ITS LCO requirements as the reason for adding SR 3.1.4.2. It must call out the CTS SR requirements, as well, not just make a general reference to "existing licenses."	a	

CHANGE TYPES: A = Administrative, AM = Major Administrative, M = Technical/More Restrictive, L = Technical/Less Restrictive, R = Relocated, B = Brackets/Plant Specific, P = Plant Specific, C = Change to NUREG

CTS/ITS MARKUP	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
			C	G	P	R			
1. CTS LCO pg 3/4 8-1, 3.8.1.1.a ITS LCO 3.8.1.a	CTS LCO requirement for "physically independent" offsite circuits changed to "qualified" in ITS LCO 3.8.1.a. No CTS notation or discussion.	L	√	√	√	√	No justification provided for the change. Explain why "qualified' can be used to replace "physically independent".	a	
2. CTS LCO pg 3/4 8-1, 3.8.1.1.b ITS LCO 3.8.1.b	The CTS LCO requirement for "separate and independent" DGs deleted from ITS LCO 3.8.1.b. No CTS notation or discussion.	L	√	√	√	√	No justification provided for the change. Provide the safety basis for the deletion of the present LCO requirement.	a	
3. CTS LCO pg 3/4 8-1, 3.81.1.B.1/.2/.3	CTS LCO requirement for "separate" day tanks, fuel storage tanks, and fuel transfer pumps for each DG has been is deleted from ITS SRs 3.8.1.4, 3.8.1.6, and 3.8.3.1. No CTS notation or discussion.	L	√	√	√	√	No justification provided for the change. Provide the safety basis for the deletion of these LCO requirements from the Technical Specifications.	a	
4. CTS LCO pg 3/4 8-1, LCO 3.8.1.1.b.2 ITS CONDITION 3.8..3.A	The markup of the CTS does not indicate that the CTS LCO 3.8.1.1.b.2 requirement has been included in the ITS as LCO 3.8.3 CONDITION A. (In addition to its use as ITS SR 3.8.3.1.)	A	√	√	√	√	Correct markup.	a	

CHANGE TYPES:........   A = Administrative, AM = Major Administrative, M = Technical/More Restrictive,
                        L = Technical/Less Restrictive, R = Relocated

RESOLUTION CODES:....   a = accepted, r = rejected, m = modify, o = open item

CTS/ITS MARKUP	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
			C	G	P	R			
5. CTS ACTION pg 3/4 8-1 3.8.1.1.a ITS RA pg 3.8-2, 3.8.1.A.2	The CTS discussion M.2 justifies a more restrictive Completion Time (24 ho... when the loss of one offsite circu... results in two divisions with no offsite power. However, the ITS markup deletes the more restrictive (24 hour) completion time. ITS discussion P.36 justifies the deletion based on the plant design to automatically fast transfer between primary and alternate offsite circuits.	L	√				CTS and ITS markups disagree on requirement. Which markup is correct? Are there plant procedures (controlled by the 10 CFR 50.59) in place that require the standby offsite circuit to be declared inoperable when the fast transfer switch is not operable? Would the failure of the fast transfer switch and the failure of the operating offsite circuit require that both offsite circuits be declared inoperable?	B	
7. CTS ACTION pg 3/4 8-1/-2, 3.8.1.1.b./c ITS RA pg 3.8-3, 3.8.1.B.3.2	No CTS notation and discussion is provide for the deletion in ITS (RA 3.8.1.B.3.2) of the CTS requirement to perform SR 4.8.1.1.2.a.5 (ITS SR 3.8.1.3) on operable DGs when one required DG is inoperable. CTS discussion L.3 does not justify this deletion.	L	√		√		Provide justification of the deletion.	o	
8. CTS pg 3/4 8-2/-3, Footnote ITS CONDITION 3.8.1.B. NOTE	CTS markup shows the footnote is being transferred to ITS as a CONDITION 3.8.1.B NOTE. Footnote requires RA 4.8.1.1.2.A.4 (NUREG 3.8.1.2) to be completed regardless of when a DG is returned to operable status. However, the ITS markup of NUREG proposes to delete the CONDITION 3.8.1.B NOTE.	L				√	Provide indication of what is planned for the CTS footnote. If footnote is to be deleted in ITS provide CTS discussion of same. (The deletion of NUREG CONDITION 3.8.1.B NOTE is generic. A Traveler is being processed.)	a	
9. CTS SR 4.8.1.1.2.a.5 ITS SR 3.8.1.3	The CTS requirement for the verification of DG capability to start and load within 90/60 seconds is proposed to be deleted from ITS SR. CTS discussion L.9 states that other SRs are adequate to confirm this capability.	L	√	√	√	√	No SRs specifically verify the ability of each DG to start and load within the CTS specified time. Is the CTS requirement a limit required by any plant specific safety analysis, industry standard, or NRC guideline?	o	

CHANGE TYPES:........   A = Administrative, AM = Major Administrative, M = Technical/More Restrictive,
                            L = Technical/Less Restrictive, R = Relocated

RESOLUTION CODES:

ELECTRICAL POWER SYSTEMS - CTS/ITS REVIEW - OPEN ITEMS

CTS/ITS MARKUP	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
			C	G	P	R			
10. CTS SR 4.8.1.1.2.a.5 (all) - Clinton - 4.8.1.1.2.e.4.a.2 4.8.1.1.2.e.6.a.2 - Grand Gulf - 4.8.1.1.2.d.4.a.2 4.8.1.1.2.d.7.a.2 - Perry - 4.8.1.1.2.f.4.a.2 - River Bend - 4.8.1.1.2.f.4.a/b 4.8.1.1.2.f.6.a.2 /.b.2 NUREG SR 3.8.1.3/.11/.12	No CTS notation or discussion of the deletion of "through load sequencer/sequencing logic/sequence" in ITS SRs.	L	√	√	√	√	Provide justification for changes.	o	
11. CTS SR pg 3/4 8-5 4.8.1.1.2.d.7.b.2 ITS SR 3.8.1.19.c.2	The ITS markup deletes the current CTS SR requirement to verify that the Division 3 DG will assume the permanent and auto-connected loads within 20 seconds. CTS discussion LA.5 states that system design information is being placed in procedures which are controlled by CFR 10 50.59.	L		√			Why is the requirement to energize permanent connected loads in 10 seconds retain in the ITS, yet the requirement to energize the auto-connected loads in 20 seconds moved to plant procedures? Is the 20 second requirement a limit required by any plant specific safety analysis, industry standard, or NRC guideline?	a	
12. CTS SR pg 3/4 8-7 4.8.1.1.2.f.4.c ITS SR 3.8.1.14 NOTE 1	The CTS markup (CTS discussion M.11) proposes the deletion of "or until operating temperatures have stabilized." The ITS markup shows adding this allowance to the ITS SR.	L				√	Other plants have dropped this allowance. The CTS discussion (M.11) for the deletion states that the use of "until the temperature stabilizes" is subject to misinterpretation on its meaning. Which markup is correct?	a	

CHANGE TYPES:.......   A = Administrative, **AM** = Major Administrative, **M** = Technical/More Restrictive,
L = Technical/Less Restrictive, **R** = Relocated

RESOLUTION CODES:...   a = accepted, r = rejected, **m** = modify, o = open item

CTS/ITS MARKUP	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
			C	G	P	R			
13. <u>CTS SR</u> pg 3/4 8-7 4.8.1.1.2.e.6.b <u>ITS SR</u> 3.8.1.19.c.2	The ITS markup deletes the current CTS SR requirement to verify that the Division 3 DG will assume the permanent and <u>auto-connected</u> loads within 12 seconds. The CTS markup does not show this is being deleted or provide a discussion concerning the deletion.	L	✓				Provide a justification for dropping the 12 second requirement. Is the 12 second requirement a limit required by any plant specific safety analysis, industry standard, or NRC guideline?	a	
14. <u>CTS SR</u> - Perry - 4.8.1.1.2.g - River Bend - 4.8.1.1.2.h <u>ITS SR</u> 3.8.1.19	CTS SR requires that all 3 Division DGs be started simultaneously and obtain the required engine speed/frequency (A.13) within <u>10</u> seconds. However, ITS SR 3.8.1.19 specifies that the Division 1&2 DGs must obtain the required frequency in 10 seconds and the Division 3 DG in 13 seconds.	L			✓	✓	Justify the use of 13 seconds in ITS.	o	
15. <u>CTS SR</u> pg 3/4 8-9 4.8.1.1.2.e.12 <u>ITS SR</u> 3.8.1.17	River Bend proposes to rewrite <u>existing</u> CTS and NUREG SR requirements to verify the interval between each load block is within 10% of its design interval. CTS discussion A.15 states that the load blocks and associated time intervals included in their engineering calculations cannot be directly correlated to the "LOAD BLOCKS" and "DESIGN INTERVALS" discussed in the SR. However, the intervals are intrinsically defined by the timer setpoints.	L				✓	All other BWR-6s have retained the NUREG (and CTS) wording. How has River Bend complied with the current TS requirement (NUREG wording)?	o	
16. <u>CTS SR</u> 4.8.1.1.2.f.3/.8 (P) 4.8.1.1.2.e.8 (C) <u>ITS SR</u> 3.8.1.9/.14 (P) 3.8.1.15 (C)	No CTS notation and discussion of ITS SR NOTEs allowing momentary transients during the successful completion of SR.	L	✓		✓		Provide justification for allowing momentary transients during the successful completion of SR.	a	

CHANGE TYPES:........ A = Administrative, AM = Major Administrative, M = Technical/More Restrictive,
L = Technical/Less Restrictive, R = Relocated

CTS/ITS MARKUP	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
			C	G	P	R			
17. CTS ACTION 3.8.1.1.2 ITS RA 3.8.2.A NOTE	No CTS notation or discussion of ITS RA 3.8.2.A NOTE.	M	√	√	√	√	Provide justification for adding ITS RA 3.3.2.A NOTE.	a	
18. CTS ACTION 3.8.1.2.a 3.8.2.2.a 3.8.3.2.a.1/.b.1 ITS RA 3.8.2.A.2.2 3.8.5.A.2.2 3.8.8.A.2.2 3.8.10.A.2	No CTS notation or discussion of replacement of "handling" in CTS with "movement" in ITS RAs.	A	√	√	√	√	Provide justification for replacement of "handling" (CTS) with "movement" (ITS).	a	
19. CTS ACTION 3.8.1.2.a ITS RA 3.8.2.A.2.2	No CTS notation or discussion of replacement of "secondary containment" in CTS with "fuel handling building" in ITS RA 3.8.2.A.2.2.	A				√	Provide justification for replacement of "secondary containment" (CTS) with "fuel handling building" (ITS).	a	
20. CTS ACTION 3.8.1.2.a ITS RA 3.8.2.A.1	No CTS discussion of the addition of ITS RA 3.8.2.A.1.	M				√	Provide justification for adding ITS RA 3.8.2.A.1.	a	
21. CTS SR 4.8.1.2 ITS SR 3.8.2.1	No CTS notation or discussion of the deletion of the CTS requirement to perform SR 4.8.1.1.3 in ITS SR 3.8.2.1.	L	√	√			Provide justification for deleting CTS requirement in ITS.	a	

CHANGE TYPES:........ A = Administrative, AM = Major Administrative, M = Technical/More Restrictive,
L = Technical/Less Restrictive, R = Relocated

RESOLUTION CODES:... a = accepted, r = rejected, m = modify, o = open item

CTS/ITS MARKUP	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
			C	G	P	R			
22. CTS SR 4.8.1.2 ITS SR 3.8.2.1	CTS discussion L.3 provides a basis for not requiring performance of SRs which involve paralleling a DG with an offsite source during Modes 4 and 5. However, the ITS SR 3.8.2.1 NOTE also excludes the performance of two SRs which do not require the paralleling of sources.	L	√	√	√	√	Provide a justification for the non-performance of required AC source SRs that do not require paralleling of sources. These SRs include NUREG SRs 3.8.1.13 and 3.8.1.15.	a	
23. CTS SR 4.8.1.2 ITS SR 3.8.2.1 3.8.1.16 (RB/P) 3.8.1.17 (C/GG)	No CTS notation or discussion is provided for the deletion of the requirement for CTS SR 4.8.1.1.2.f.11(C, P, and RB) or 4.8.1.1.2.f.12 (GG) in ITS SR 3.8.2.1.	L	√	√	√	√	Provide justification for deletion.	o	
24. CTS ACTION 3.8.2.1.b ITS RA 3.8.4.B.1	No CTS notation or discussion for changing "associated SSW subsystem" in CTS ACTION statement to "standby Service Water System pump 2C" in the ITS RA statement.	L				√	Provide justification for the change in wording.	a	
25. CTS SR 4.8.2.1.b.2/.3 ITS SR 3.8.4.2/.3	No CTS notation or discussion for not including the CTS SR requirement to perform the SRs after a battery discharge or overcharge in the ITS SRs.	L				√	Provide a justification for the deletion.	o	
26. CTS SR 4.8.2.1.c.4/.5 ITS SR 3.8.4.6	No notation or discussion provided for replacement of battery charger identification numbers as found in the CTS SRs with "Division 1 and 2," and "Division 3" respectively in ITS SR.	A	√				Provide justification for the change.	a	

CHANGE TYPES:........ A = Administrative, AM = Major Administrative, M = Technical/More Restrictive,
L = Technical/Less Restrictive, R = Relocated

RESOLUTION CODES:

CTS/ITS MARKUP	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
			C	G	P	R			
27. CTS SR 4.8.2.1.d (GG) 4.8.2.1.d.1 (C/P/RB) ITS SR 3.8.4.7	No CTS notation or discussion is provided for the replacement of "actual" (C, P, & RB) or "actual or simulated" (GG) in CTS SR 4.8.2.1.d (.1) with "required" in ITS SR 3.8.4.7. [River Bend indicates discussion LA.3 to justify the change. However, LA.3 does not discuss the change.]	A	✓	✓	✓	✓	Provide justification for the change in wording.	a	
28. CTS SR 4.8.2.1.d.2 ITS SR 3.8.4.7	No CTS notation or discussion is provided for the deletion of SR 4.8.2.1.d.2 in ITS SR 3.8.4.7.	L	✓				Provide justification for the deletion of CTS SR requirement in ITS SR 3.8.4.7.	o	
29. CTS ACTION 3.8.2.2.c ITS RA 3.8.5.A NOTE	No CTS discussion provided for revision of CTS restriction on changes in operational conditions (per 3.0.4) as included in ITS RA 3.8.5.A NOTE.			✓			Provide justification for changes in RA NOTE.	o	
30. CTS CONDITION pg 3/4 8-19	No notation or discussion is provided for the addition of ITS CONDITION 3.8.9.F.	M	✓				Provide justification for adding ITS CONDITION 3.8.9.F.	a	
31. CTS ACTION pg 3/4 8-20	A number of proposed ITS CONDITIONS are incorrectly identified, including the insert (A.2).	A				✓		a	
32. CTS pg 3/4 8-16 LCO 3.8.3.1.a.4 ACTION 3.8.3.1.a.3 ITS LCO 3.8.1.c	The Grand Gulf CTS markup discussion A.1 states "Therefore, no separate LCO item is proposed" when discussing the proposed changes of the ITS LCO requirement for load sequencers. However, the ITS markup includes the load sequencers as LCO 3.8.1.c.			✓			Provide justification for ITS LCO.	a	

CHANGE TYPES:........   A = Administrative, AM = Major Administrative, M = Technical/More Restrictive,
                        L = Technical/Less Restrictive, R = Relocated

RESOLUTION CODES:

CTS/ITS MARKUP	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
			C	G	P	R			
33. CTS ACTION pg 3/4 8-16 3.8.3.1.a.3 ITS CONDITION 3.8.1.B/.D/.F	The CTS COMPLETION TIME of 12 hours for an inoperable load sequencer is proposed to be changed to 24 hours for the ITS CONDITION 3.8.1.F (CTS discussion L.1).	L		✓			Is the manually connection of emergency loads given credit in any plant specific safety analysis, industry standard, or NRC guideline?	o	
34. CTS ACTION pg 3/4 8-16 3.8.3.1.a.3 ITS CONDITION 3.8.1.B/.D	No CTS notation or discussion is provided for the addition of "for reasons other than CONDITION F." to ITS CONDITION B (one DG inoperable) and D (one DG and one offsite circuit inoperable) statements. ITS discussion P.34 states that the changes will prevent conflict if an inoperable sequencer results in both the DG and offsite source becoming inoperable. The discussion also states that a NOTE is provide to direct appropriate actions and avoid conflicts. The ITS markup does not include the stated NOTE.	L		✓			Provide the ITS discussion P.34 specified NOTE. The exclusion of CONDITION F as a cause to enter CONDITION B/D could result in a condition with one offsite circuit and one DG inoperable for up to 24 hours. Condition D only allows operation for up to 12 hours under this condition. What is the safety justification for allowing an inoperable sequencer to potentially double the COMPLETION TIME for CONDITION 3.8.1.D (from 12 to 24 hours)?	o	
35. CTS ACTION 3.8.3.1.a/.b (M.1) ITS RA 3.8.9.A.1/B.1/C.1 (C & RB) 3.8.7.A.1/.B.1 (GG & P)	CTS discussion M.1 justifies the addition of a second COMPLETION TIME for contiguous occurrences of failing to meet the LCO by a combination of AC AND DC distribution systems. However, NUREG CONDITIONs 3.8.9.A/.B/.C and related RAs do not consider the effects of both AC and DC distributions systems inoperability/operability.	M	✓	✓	✓	✓	Provide the proper justification for the second completion time for AC and DC distribution systems Note! The NUREG BASES discussion of the second COMPLETION TIME for NUREG RAs A.1 (pg B 3.8-82) and C.2 (B 3.8-86) are reversed.	a	
36. CTS ACTION 3.8.3.1.a.3.a/.b ITS CONDITION 3.8.9.B/.E	No CTS notation or discussion provided for deletion in ITS of invertor bus identification numbers.	A	✓				Provide justification for deletions.	a	

CHANGE TYPES:....... A = Administrative, AM = Major Administrative, M = Technical/More Restrictive,
L = Technical/Less Restrictive, R = Relocated

RESOLUTION CODES:... a = accepted, r = rejected, m = modify, o = open item

ELECTRICAL POWER SYSTEMS - CTS/ITS REVIEW - OPEN ITEMS

CTS/ITS MARKUP	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
			C	G	P	R			
37. CTS ACTION 3.8.3.1.a.3.b ITS CONDITION 3.8.9.E	No CTS notation or discussion provided for deletion in ITS of requirement to "take ACTION required by Specification 3.5.1."	L	√				Provide justification for deletion.	a	
38. CTS ACTION 3.8.3.1.a.4 ITS RA 3.8.7.C.1.2	No CTS notation and discussion of the addition of the ITS RA.	M	√				Provide justification for addition of ITS RA.	a	
39. CTS ACTION 3.8.3.2.a.2/b.2 ITS RA 3.8.8.A.1 3.8.10.A.1	No CTS notation or discussion of replacing CTS "declare the HPCS system (and C SSW pump)" with "Declare affected required feature(s) inoperable" in ITS.	M	√			√	Provide justification for changes.	a	
40. CTS ACTION 3.8.3.2.a.2/b.2 ITS RA 3.8.8.A.1	No CTS notation or discussion of replacing CTS "declare the HPCS system" with "Declare affected required feature(s) inoperable" in ITS.	M		√	√		Provide justification for changes.	a	
41. CTS ACTION 3.8.3.2 ITS RA 3.8.8.A.1 3.8.10.A.1	No CTS notation or discussion of addition of ITS RAs.	M	√			√	Provide justification for addition of RA in ITS.	a	
42. CTS ACTION 3.8.3.2 ITS RA 3.8.8.A.1	No CTS notation or discussion of addition of ITS RA.	M		√	√		Provide justification for addition of RA in ITS.	a	

CHANGE TYPES:........   A = Administrative, AM = Major Administrative, M = Technical/More Restrictive,
L = Technical/Less Restrictive, R = Relocated

RESOLUTION CODES:

CTS/ITS MARKUP	DESCRIPTION	T Y P E	GENERIC				JUSTIFICATION/CONCLUSION	C O D E	A f L
			C	G	P	R			
PROPOSED NUREG CHANGES									
43. NUREG CONDITION pg 3.8-3 3.8.1.B NOTE	NUREG CONDITION NOTE is proposed to be deleted. The NOTE requires that RA 3.8.1.B.3.1/.2 be completed if CONDITION B is entered and subsequently cleared. ITS discussion C.1. The requirement is presently a CTS requirement (CTS ACTION 3.8.1.1.b) for all plants. The deletion of requirement is noted and discussed (L.14) in the CTS markups.	L	√	√	√	√	A Traveler is required.	o	
44. NUREG RA pg 3.8-4 3.8.1.D.NOTE	Proposed to change NUREG "when CONDITION D is entered with no power source to one [division]." to "when any division is deenergized as a result of CONDITION D." ITS discussion C.32.	A	√	√	√	√	A Traveler is required.	a	
45. NUREG SR pg 3.8-7 3.8.1.3	Proposed to delete "is synchronized and loaded and" from NUREG SR. ITS discussion C.2.	A	√	√	√	√	Traveler required.	a	
46. NUREG SR pg 3.8-9 3.8.1.9	Proposed to add following NOTE to ITS (NUREG): "If performed with DG synchronized with offsite power, it shall be performed at a power factor ≤0.9." ITS discussion C.3.	M	√	√	√	√	Traveler in process.	o	

CHANGE TYPES:........ A = Administrative, AM = Major Administrative, M = Technical/More Restrictive,
L = Technical/Less Restrictive, R = Relocated

RESOLUTION CODES:

CTS/ITS MARKUP	DESCRIPTION	T Y P E	GENERIC				JUSTIFICATION/CONCLUSION	C O D E	A P L
			C	G	P	R			
47. NUREG SR pg 3.8-9 3.8.1.9	Proposed to delete specific loads from NUREG SR. The SR will then read: "Verify each DG rejects a load equivalent to the single largest post accident load." ITS discussion P.8.	A	✓	✓	✓	✓	Traveler required. Why replace ≥ with equivalent? What is the definition of equivalent?	o	
48. NUREG SR pg 3.8-9 3.8.1.10	Proposed to insert NOTE in SR stating: "Momentary transients outside the load and power factor ranges do no invalidate this test." ITS discussion C.42. Allowance is present in Clinton and River Bend CTS SRs.	L	✓	✓	✓	✓	Traveler being processed. ITS discussion C.42 states that this is presently allowed in 3 of 4 BWR-6s. However, I can only find this allowance in the Clinton and River Bend CTS SRs.	o	
49. NUREG SR pg 3.8-10 3.8.1.11.c.2	Proposed to change "energizes auto-connected shutdown loads through [automatic load sequencer]" in NUREG SR to "energizes auto-connected shutdown loads" in ITS SR. ITS discussion C.34.	A	✓	✓	✓	✓	Traveler required. No change in technical requirement.	a	
50. NUREG SR pg 3.8-11 3.8.1.12.e	Proposed to delete "energized " and "through [automatic load sequencer]" from NUREG SR statement. ITS discussion C.34. The NUREG SR requirement is not included in any plant CTS.	L		✓	✓	✓	Traveler required.	a	
51. NUREG SR pg 3.8-13 3.8.1.14	Proposed to restate NUREG SR requirement and remove the listing of separate P.F. requirements for each DG. ITS discussion C.28.	A	✓			✓	All DGs for the four plants have the same P.F. (.9) requirement. The proposed statement simplifies the SR requirement.	o	
52. NUREG SR pg 3.8-16 3.8.1.19	Proposed to delete "through [load sequencer]" from NUREG SR statement. ITS discussion C.34. The NUREG SR requirement is not included in the Perry CTS.	L	✓	✓	✓	✓	Traveler required.	a	

CHANGE TYPES:........ A = Administrative, AM = Major Administrative, M = Technical/More Restrictive,
L = Technical/Less Restrictive, R = Relocated

RESOLUTION CODES:

CTS/ITS MARKUP	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
			C	G	P	R			
53. NUREG Table pg 3.8-18 3.8.1-1 NOTE (b)	Proposed to delete "This is...Revision 3." ITS discussion C.5.	A	√	√	√	√	Traveler required.	a	
54. NUREG LCO PG. 3.8-19 3.8.2.c	Proposed editorial changes. ITS discussion C.6.	A	√	√	√	√	Traveler in process.	o	
55. NUREG RA pg 3.8-20 3.8.2.A NOTE	Proposed editorial changes. ITS discussion C.32.	A	√	√	√	√	Traveler required.	a	
56. NUREG SR pg 3.8-22 3.8.2.1	Proposed to make NUREG SR 3.8.1.8 not applicable during operating modes 4 and 5. ITS discussion C.7.	L	√	√	√	√	Traveler in process.	o	
57. NUREG CONDITION pg 3.8-23 3.8.3.8	Proposed editorial changes. ITS discussion C.32.	A	√	√	√	√	Traveler in process.	o	
59. NUREG SR pg 3.8.27	Proposed editorial changes (add "battery"). ITS discussion C.9.	A	√	√	√	√	Traveler in process.	o	
60. NUREG RA pg 3.8.36 NOTE	Proposed to add ACTION NOTE requiring entry into LCO 3.8.9 if AC Vital/Uninterruptable bus de-energized. (Similar to CONDITION 3.8.1.D RA.) ITS discussion C.29.	M	√			√	Traveler required.	o	
61. NUREG RA pg 3.8.42 3.8.10.A.2.2	Proposed to replace "handling" with "movement". ITS discussion C.28.	A	√	√	√	√	Traveler required.	a	

CHANGE TYPES:........ A = Administrative, AM = Major Administrative, M = Technical/More Restrictive,
L = Technical/Less Restrictive, R = Relocated

RESOLUTION CODES: a = accepted, r = rejected, m = modify, o = open item

CTS/ITS MARKUP	DESCRIPTION	TYPE	GENERIC				JUSTIFICATION/CONCLUSION	CODE	APL
			C	G	P	R			
62.	The CTS requirement to perform SRs during shutdown has been deleted in the ITS SR. CTS discussion A.4 stated that a SR note will limit performance in certaian modes.				x			o	
63.	Values are missing from the submital.				x	x		o	

CHANGE TYPES:....... A = Administrative, AM = Major Administrative, M = Technical/More Restrictive,
L = Technical/Less Restrictive, R = Relocated

RESOLUTION CODES:... a = accepted, r = rejected, modify, o = open item