

May 23, 1994

Docket Nos. 50-416, 50-440  
50-458, and 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 APRIL 11-14, 1994

On April 11-14, 1994, representatives for the BWR/6 licensees and INEL met with members of the NRC staff at the Clinton Power Station in Clinton, Illinois 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. Enclosure 1 is the list of attendees.

The purpose of the meeting was to discuss the results of the staff's review of the fifth sequence of the technical specifications that make up the conversion packages. The fifth sequence included Section 3.6, "Containment Systems." Enclosure 2 represents the status of this review.

Original Signed By:

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

Enclosures:  
1. List of Meeting Attendees  
2. Handouts

cc w/ enclosures:

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20565-0001

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*Douglas V. Pickett*

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BWR/6 MEETING

APRIL 11-14, 1994

MEETING ATTENDEES

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## Section 3.6 - Containment Systems

## LCO 3.6.1.1 - Primary Containment

## CTS to ITS LCO Evaluation

4/15/94

ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
1. CTS LCO 3.6.1.1.2 LCO 3.6.1.2 ITS LCO 3.6.1.1 LCO 3.6.1.10	LCO 3.6.1.1 title changed to include "operating" per plant terminology and new LCO 3.6.1.10 (Supplement) added for "shutdown".	A M	?	?	X	X	[P5 of 3.6.1.1 and P2 of 3.6.1.10] The format for all plants shall be the same. LCO 3.6.1.10 only contains one condition and one SR which could be included into LCO 3.6.1.1 and would look similar to LCO 3.6.4.1 of the NUREG. Otherwise CPS and GG should adopt two LCO format. This would maintain the NUREG format, consistency between plants. Traveler?	a	C	Based on Plant specific design and analysis. CPS and GGNS require only secondary containment integrity during fuel handling while RBS and PNPP each establish primary containment only.	

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			C	G	P	R					
2. CTS 3.6.1.2/3	Primary containment leakage rate exemptions are relocated and purge valve testing intervals are extended.	CLBR	X	X	X	X	[A1], [A2] This change will result in exemptions to Appendix J not being identified in Tech Specs. GG is requesting another exemption to extend interval to 24 months on purge valves and [A2] justification does not agree with SR 3.6.1.3.5/6.	a	G	A1 does result in the Technical Specifications identifying Appendix J exemptions but the Technical Specifications will require Appendix J as modified by any approved exceptions to be met.  A2 does not result in a exemption to Appendix J. As discussed in A2 the CTS and the ITS requires testing more frequently for the purge valves than Appendix J requires; therefore, the requirements of Appendix J are met by the surveillance requirements of the Technical Specifications. The A2 justification does agree with SR 3.6.1.3.5 (NUREG 3.6.1.3.6) since this SR requires the purge valves to be leak tested more frequently than Appendix J requires, thereby, meeting the requirements for Appendix J.	
3. ITS SR 3.6.1.2	This SR deleted because it is in brackets.	A	X	X	X	X	[B1] This can be deleted if OG verify the containment structure does not contain testable tendons.	a	N		

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			C	G	P	R					
4. ITS SR 3.6.1.1	A note is added to SR 3.6.1.1.1 to include results of new SR 3.6.1.2 testing into overall leakage rate test.	P	X				[P7] Why is the system not tested during the IRLT of SR 3.6.1.1.1?	a	C	Per App. J, the containment isolation valves must be closed by their normal means. In this configuration, the loop outside containment would not be tested. This is an additional test beyond App. J.	
5. ITS SR 3.6.1.2 CTS 4.6.7.1.c	This new SR covers the CTS requirement to perform Type A test on Primary Containment Hydrogen Recombiner System.	P	X				[P7] Are the hydrogen recombiners permanently installed or borrowed?	a	C	The hydrogen recombiners are permanently installed outside containment.	
6. CTS 3.6.1.2 a, b, & e	Various plant specific leakage rates.	A			X		[A3], [A4] These changes are approvable but the justifications need clarification.	o	N	Both A3 and A4 refer to previous submittals made by PNPP. A3 refers to letter PY-CEI/NRR-1576L dated March 1, 1993, and A4 refers to letter PY-CEI/NRR-1510L dated June 24, 1992. Presently PNPP is reviewing the March 1, 1993 submittal for possible partial withdrawal.  Open for OTSB tracking.	
7. CTS SR 4.6.1.1.a	Opening/closing requirements for Type 2 tested penetrations relocated to bases, etc.	R	X	X	X	X	[A3] This requirement can be removed because it is redundant to requirement similarly found in Appendix J-III.C.3.	a			V

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			C	G	P	R					
8. CTS SR 4.6.1.1.a	The P <sub>1</sub> value is relocated and specified in the Bases.	R	X	X	X	X	[LA1] The Appendix J-III.D.2.a permits the value to be specified in the Bases.	a			C
9. ITS 3.6.1.10	These new LCOs for Primary Containment-Operating/Shutdown are dependent upon discussions for item #1	AM	?	?	X	X	This is a place holder item. All items of LCO 3.6.1.10 need review prior to acceptance of 3.6.1.1.	a	C	See response to LCO 3.6.1.1 comment 1.	
10. CTS 4.6.1.5/6. 1	SR for structural integrity visual inspection is relocated to plant procedures	CLB	X	X	X	X	[A1] This is consistent with NUREG and some change will be made. To maintain further consistency with Drywell integrity, add new SR like NUREG SR 3.6.5.1.2 and update BASES.	a	C	Appendix J requires the surface of the containment to be inspected. Thus, this requirement is contained in SR 3.6.1.1.	

## CTS to ITS LCO Evaluation

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ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	DISCUSSION
			C	G	P	R					
1. CTS LCO 3.6.5.1	The Perry containment design requires a containment vacuum relief after actuation of the RHR Containment Sprays to limit the negative pressure differential.	P	-	-	X	-	River Bend has no containment spray and PC unit coolers. GG and CPS were verified in USAR 6.2.1.1.4.2 to not need a containment vacuum breaker system because negative pressure is less than 3 psid negative limit determined by liner plate deformation. What are the reasons for this system at PNPP?	a	P	Bases describes why they are needed at PNPP. They are used to mitigate containment negative pressure events. USAR 6.2.1.1.4.2 also provides similar discussion.	
2. ITS 3.6.1.11 CTS 3.6.5.1	The CTS define requirements for containment vacuum breakers only whereas ITS LCO and BASES define components as vacuum breaker, vacuum lines, various valves, subsystems and system?	P	-	-	X	-	[A1] A complete description of the system configuration components/subsystems is not provided to enable a review of this LCO. No USAR is available to the Chapter reviewer.	o	N	USAR 6.2.1.1.4.2.1 provided to help reviewer.  NRC to evaluate proposed changes.	

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			C	G	P	R					
3. ITS 3.6.1.11 Applicability Note	This is a new note which was not part of the CTS.	P	-	-	X	-	[A3] This is information best presented in the BASES. This is only needed when in an LCO Condition and should not be part of normal operation. Vacuum breakers are also needed for Containment Isolation function regardless of the RHR containment spray status.	o	P N	Review A3.  PNPP to provide additional justification for LCO Note.  NRC to evaluate proposed changes.	
4. ITS Condition A Actions Note	The Condition A is meant to assure PCIV isolation occurs if vacuum breakers are not closed.	P	-	-	X	-	[A4] This condition should be relocated to LCO 3.6.1.3 where CIV functions can be fully defined.	o	N	See comment 1 to 3.6.1.3.  NRC to evaluate proposed changes.	

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			C	G	P	R					
5. ITS Condition D	The new ITS imply movement of irradiated fuel in PC while in MODES 1, 2, and 3 by Required Actions and Applicability.	P	-	-	X	-	CTS-[M1] Explain Condition D and BASES Applicability. RHR containment spray is only required in MODES 1, 2, & 3, so why is this LCO applicability during the other conditions?	o	N	Even though Containment spray is not required, it may be capable of automatic or manual actuation outside of MODES 1, 2, or 3. Thus the assumptions used in USAR 6.2.1.1.4.2 would be valid and the need for vacuum breakers and humidity control are valid. Condition D covers all applicable actions for the condition described without regard to MODE the plant is in.  NRC to evaluate proposed changes.	
6. CTS 4.6.5.1 b.1.a, b.2.a	The details of how to perform these SRs have been relocated to BASES and plant procedures.	CLBR	-	-	X	-	[LA2] This is acceptable per the reformat change of the NUREG.	a	P		

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ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	STATUS
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1. ITS Applicability	Changed Applicability to add 3 new operational modes for refueling, core alterations and OPDRVs	CLB	-	?	X	X	[P3] This is approvable, however since Grand Gulf was the basis for the NUREG, all plants must clarify why needed or not needed?	a	C	RBS and PNPP establish primary containment during fuel handling. Thus, this Applicability is added for them. CPS and GGNS establish secondary containment during fuel handling. However, the upper containment air lock at CPS bypasses secondary containment. Thus, it is required in addition to the secondary containment.	
2. ITS Applicability	CPS adds same three new modes but restricts to only the upper air lock (required) and adds fuel movement in SC.	P	X				[P3] and CTS - [M2] This is not in the CPS CLB? Why is Clinton unique from Perry and River Bend? This distinction would require additional new LCOs or conditions for the inoperable "nonrequired" air locks? Can CPS just have item #1 above?	a	C	See response to LCO 3.6.1.2 comment 1. <i>CTS does not specify upper containment airlock operability but current plant practice included them</i>	
3. CTS 3.6.1.3/4. a and .b	The details of air lock OPERABILITY are relocated to SRs, BASES, procedures and administrative controls. P <sub>1</sub> is now defined in BASES.	CLBR	X	X	X	X	[LA1], [LA2] This is acceptable under the reformat changes of the NUREG.	a			V
4. ITS Note #3	LCO name changes	CLB			X	X	[P2] Dependent upon resolution of same items for ITS LCO 3.6.1.1.	a	C	See response to LCO 3.6.1.1 comment 1.	



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5. ITS Note #3	Adds Note applicability to only MODES 1,2,and 3.	P	X	?	X	X	[P3] The justification contradicts the explicit need for PC OPERABLE during all operations conditions of the Applicability.	a	C	See response to LCO 3.6.1.2 comment 1.	
6. ITS Condition "E"	New Condition "E" added for inoperability during new operational conditions.	C L B	X	?	X	X	[P3] This change is consistent with CLB for Perry and River Bend, but not CPS. Why does Clinton make LCO 3.0.3 not applicable?	a	C	See response to LCO 3.6.1.1 and LCO 3.6.1.2 comment 1.	
7. ITS SR 3.6.1.2.1	A new Note #1 or change to Note #2 limits test result evaluation to only MODES 1,2, and 3.	L	X	?	X	X	[P3] The waiver of SR 3.0.2 permits sufficient time to evaluate and take action in all MODES and operational conditions.	a	C		
8. ITS SR 3.6.1.2.1	Text change to first paragraph.	P				X	[P7] The added test balloon is a restatement of Note 2 above.	o	R	Note 2 only applies to MODES 1, 2, and 3. The air locks are required to be operable during other conditions such as CORE ALTERATIONS.  RBS to provide docketed markup changes.	

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ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	SCAT
			C	G	P	R					
9. ITS SR 3.6.1.2.1	Deletes items a and b and substitutes new text.	CLB				X	[P7] The new leakage limit is acceptable because it is CLB. However need to keep a. and b. which are same test from CTS 4.6.1.4a and 4b. Also maybe the leakage rate for an air lock should be 6750 cc/hr per CTS Table 3.6.1.3-1.	o	R	The correct limit is $\leq 13500$ cc/hr. The limits in CTS Table 3.6.1.3-1 also apply to penetrations other than air locks.  RBS to provide docketed markup changes.	
10. ITS SR 3.6.1.2.3	Word changes to note on directional entry and exit.	A				X	[C8] and CTS [L4]? This adds unnecessary words that were previously removed in approved changes to Condition B (under C11) of this LCO.	a	R	SR 3.6.1.2.3 wording changes made are consistent with the ACTION B Note 2 changes.	
11. ITS Condition A Note #2. Also Action Note #1	Entry and exit for 7 days under Administrative Controls with both air locks inoperable.	CLB	X	X	X	?	CTS - [L2], [L3], [L8]  L[3] for everyone but Perry General discussion needed on Action Note #1 precedes. River Bend has similar CTS 3.6.1.4 Action a.3 for "one door inoperable in each air lock" not "both air locks inoperable". This looks to be a NUREG problem otherwise this is Condition C. Text in brackets should be → [if both air locks are affected].	o	P	An inoperable air lock door results in an inoperable air lock.  This comment is being held open for OTSB to track submittal of changes by PNPP.	

## CTS to ITS LCO Evaluation

4/15/94

ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
12. CTS 3.6.1.2(4) .a	Verification of OPERABLE door lock closed in CTS now permitted checked by use of administrative "means" in Required Action Notes.	L	X	X	X	X	[L6] Discussion needed to clarify where high rad areas exists and when dedicated personnel are used versus the proposed changes to entries into high rad area via Section 5.11.	a	N		
13. CTSG 4.6.1.3(4) .a & .b	Exemptions to Appendix J.	R L	X	X	X	?	[A5] Exemptions are different for each plant, however these justifications are the same. The bases should state what are the approved exemptions. Also why is Note #1 not included and extended for maintenance?	a	G	Appendix J III.D2(b)(ii) requires that air locks that have been opened be tested prior to establishing Containment Integrity; therefore, the Frequency covers CTS 4.6.1.3.b.2.	
14. CTS 3.6.1.4 Action d and 4.6.1.3.d. 1	Deletion of the TS for inflatable seal pressure instrumentation channel.	R		X		X	[LC1] Acceptance of these changes are pending the chapter reviewer's approval of the technical justification.	a	N		
15. CTS 4.6.1.3.a & b.1	These TS Surveillance Frequencies are being extended via exemptions being sought through separate licensing action.	L		X			[A11] This is treated as information only. This item is rejected because no justification provided and it is implied this review takes place elsewhere.	o	N	This item should be open for tracking the License Amendment.  Open for OTSB tracking.	

## CTS to ITS LCO Evaluation

ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
1. ITS LCO 3.6.1.4 and SR 3.6.1.4	The containment pressure in the CTS is an "internal" pressure.	P				X	Suggest addition of "internal pressure" to clarify in LCO, Condition A, and SR.	a	R	This is an editorial preference.	

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CTS to ITS LCO Evaluation

ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
1. ITS SR 3.6.1.6.1	The new SR is added in lieu of existing CTS.	L ? T ?	X	X	X	X	[A2] This is approvable based upon format changes to NUREG, however verification that changes to Section 1.0 are made. Why is the staggered test basis in brackets?	a	N		
2. ITS SR 3.6.1.6.1	Note to SR adds text "and flow are adequate to perform the test".	L		X	X	X	[C6] This is a generic change - Traveler Required. This appears approvable because it is the only way to perform the test under normal operational conditions.	o	C	BWR-16, C.7.  This comment is being held open for NRC OTSB tracking only.	
3. ITS SR 3.6.1.6.2	New text changes to the wording of the SR.	A	?	?	X	?	[P5] Why don't other plants want this change?	o	P	Wording for PNPP should be changed to "Verify the LLS function of the six safety/relief valves actuates on an actual or simulated automatic initiation signal." This is a PNPP wording preference not requested by the other plants.  PNPP to provide docketed ITS markup.	

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Status Category: CG = Owner Group review, N = NRC review, GA = Owner Group appeal, NA = NRC appeal, C = Closed, V = Verify Relocated

## CTS to ITS LCO Evaluation

4/15/94

ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
4. CTS 4.4.2.2.b	CPS has the 18 month test which is independent of the SELF TEST SYSTEM.	P	X				Please explain this CTS requirement with respect to SR 3.6.1.6.2. Also where is [A3] used in this CTS justification?	o	C	SR 3.6.1.6 is the SR to overlap with the instrumentation SRs due to the change to delete the actuated device from the LSFT. The instrumentation and this CTS SR is included in Section 3.3 (ref SR 3.3.6.5.4 and 5).  This should have been an "LA" to detail the frequency of the specific tests. CPS to provide revised CTS 3/4 6-11(1) markup. Delete L1, replace with reference to SR 3.3.6.5.5	
5. CTS Action c and 4.4.2.2.1	The OPERABILITY requirements for the instrumentation channels are relocated to LCO 3.3.6.5.	C L B R	X	X	X	X	Acceptance of these changes are pending the chapter reviewer's approval of the technical justification.	a	N		
6. All CTS 3.4.2.2	The relief valve function of this CTS LCO is relocated to LCO 3.4.4.	C L B R	X	X	X	X	Acceptance of these changes are pending the chapter reviewer's approval of the technical justification.	a	N		

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## CTS to ITS LCO Evaluation

4/15/94

ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	STATUS
			C	G	P	R					
1. CTS 3.6.3.2 LCO Statement	The relocation to the BASES of the identification of the separate system design components required OPERABLE.	CLBR	-	-	-	X	[LA1] It is acceptable to relocate to the BASES; however, there are CTS requirements and new text which require discussion.	o	R	Changes made to LCO statement are consistent with similar changes made to other LCOs.  RBS to revise the Bases. Add "and capable of reject heat to SSWS...."	
2. CTS 3.6.3.2 Action a	The AOT of 72 hours is relaxed to 7 days for one PC unit cooler inoperable.	CLBL	-	-	-	X	[L1] The NUREG-1434 does not contain an LCO for PC unit coolers. The justification as being consistent to ECCS subsystem is not comparable. Operation is independent of ECCS therefore 72 hours is still appropriate.	o	N	The Primary Containment Unit Coolers at RBS serve the same function as Containment Sprays at GGNS, CPS, and PNPP which have an AOT of 7 days with one subsystem inoperable.  OTSB to review L.1.	
3. CTS 4.6.3.2.c ITS SR 3.6.1.7.3	The details of a system/component functional test are relocated to BASES or procedures.	CLBR	-	-	-	X	[LA2] It is acceptable to relocate details to procedure; however, it is not needed in this case. A rewrite of SR 3.6.1.7.3 to include CLB is possible.	o	R	Changes made are consistent with similar changes made to other SRs.  RBS to revise Bases to address pressure relief and backdraft dampers isolations	

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ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	SCAT
			C	G	P	R					
1. CTS 3.6.3.2 LCO Statement	The relocation to the BASES of the identification of the separate system design components required OPERABLE.	CLBR	-	-	-	X	[LA1] It is acceptable to relocate to the BASES; however, there are CTS requirements and new text which require discussion.	o	R	Changes made to LCO statement are consistent with similar changes made to other LCOs.  RBS to revise the Bases. Add "and capable of reject heat to SSWS...."	
2. CTS 3.6.3.2 Action a	The AOT of 72 hours is relaxed to 7 days for one PC unit cooler inoperable.	CLBL	-	-	-	X	[L1] The NUREG-1434 does not contain an LCO for PC unit coolers. The justification as being consistent to ECCS subsystem is not comparable. Operation is independent of ECCS therefore 72 hours is still appropriate.	o	N	The Primary Containment Unit Coolers at RBS serve the same function as Containment Sprays at GGNS, CPS, and PNPP which have an AOT of 7 days with one subsystem inoperable.  OTSB to review L.1.	
3. CTS 4.6.3.2.c ITS SR 3.6.1.7.3	The details of a system/component functional test are relocated to BASES or procedures.	CLBR	-	-	-	X	[LA2] It is acceptable to relocate details to procedure; however, it is not needed in this case. A rewrite of SR 3.6.1.7.3 to include CLB is possible.	o	R	Changes made are consistent with similar changes made to other SRs.  RBS to revise Bases to address pressure relief and backdraft dampers isolations	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
1. CTS 3.6.1.5	CLB refers to "Divisions" OPERABLE rather than "Subsystems".	P				X	[LA1] What is appropriate terminology? The BASES don't agree. In SR 3.6.1.9.3, what is the un- apparent difference? Also, explain with regards to terminology used in SR 3.6.1.3.7.	o	R	Both terms are correct.  RBS to provide consistent terminology.	
2. ITS 3.6.1.8/9 Condition B	The CLB requires a LCO 3.0.3 shutdown when two subsystems are inoperable. New Condition B is a relaxation in the NUREG that permits this degraded condition 7 days before shutdown.	L	X	X	X	X	[L1] This change can be approved provided this justification (which is needed for SER) explicitly qualifies the three factors used in the engineering judgment applied. The references are not available and item 2 is not addressed. What is the incremental (or percent) increase in the core damage frequency with two subsystems inoperable for 7 days? For RB, are these references the same for MSPLCS?	o	N	See response to LCO 3.6.1.8 comment 3.  OTSB to review L.1.	
3. ITS SR 3.6.1.9.2	The operation of the PVLCS compressor is specified here rather than in LCO 3.6.1.8.	R				X	Since the compressor air for MS- PLCS comes from PVLCS, shouldn't the SR be there? The new SR 3.1.9.1 verifies air pressure exists.	a	R	ITS SRs match the CTS SRs.	

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ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	SCAT
			C	G	P	R					
4. ITS SR 3.6.1.9.1 and .2	Deletion of SR which verifies OPERABILITY of MSIV-LCS per CTS 4.6.1.4	CLB L		X			CTS - [A1], ITS - [P4] The basis for this CLB deletion is that change was previously submitted to NRC on 6-25-93, however it's not approved yet.	o	N	This item should remain open for tracking the amendment.  This comment is being held open for NRC OTSB tracking only.	
5. CTS 4.6.1.4.d/ e	The relocation of OPERABILITY tests for MSIV-LCS & MS-PLCS control system instrumentation channels.	CLB R	X		X	X	[LA4], [L2] for others Acceptance of these changes are pending the chapter reviewer's approval of the technical justification.	o	N	NRC to review L.2	
6. CTS 4.6.1.4.a/ c	The details of how the SR is performed are relocated to procedures.	CLB R	X	X	X	X	[LA2] This is acceptable under the reformat changes of the NUREG.	a			V
7. CTS 4.6.1.4.b/ c	The IST requirements are not specified in ITS but are relocated to Section 5 ( ).	CLB R	X	X	X	X	[LA3] This is approvable per the NUREG format change but what exists to verify this CLB requirement will be fulfilled.	a	N	To be provided on LA matrix for each plant.	

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ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	SCAT
			C	G	P	R					
1. CTS 3.6.1.5	CLB refers to "Divisions" OPERABLE rather than "Subsystems".	P				X	[LA1] What is appropriate terminology? The BASES don't agree. In SR 3.6.1.9.3, what is the unapparent difference? Also, explain with regards to terminology used in SR 3.6.1.3.7.	o	R	Both terms are correct.  RBS to provide consistent terminology.	
2. ITS 3.6.1.8/9 Condition B	The CLB requires a LCO 3.0.3 shutdown when two subsystems are inoperable. New Condition B is a relaxation in the NUREG that permits this degraded condition 7 days before shutdown.	L	X	X	X	X	[L1] This change can be approved provided this justification (which is needed for SEF) explicitly qualifies the three factors used in the engineering judgment applied. The references are not available and item 2 is not addressed. What is the incremental (or percent) increase in the core damage frequency with two subsystems inoperable for 7 days? For RB, are these references the same for MSPLCS?	o	N	See response to LCO 3.6.1.8 comment 3.  OTSB to review L.1.	
3. ITS SR 3.6.1.9.2	The operation of the PVLCS compressor is specified here rather than in LCO 3.6.1.8.	R				X	Since the compressor air for MS-PLCS comes from PVLCS, shouldn't the SR be there? The new SR 3.1.9.1 verifies air pressure exists.	a	R	ITS SRs match the CTS SRs.	

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ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	STATUS
			C	G	P	R					
4. ITS SR 3.6.1.9.1 and .2	Deletion of SR which verifies OPERABILITY of MSIV-LCS per CTS 4.6.1.4	CLB		X			CTS - [A1], ITS - [P4] The basis for this CLB deletion is that change was previously submitted to NRC on 6-25-93, however it's not approved yet.	o	N	This item should remain open for tracking the amendment.  This comment is being held open for NRC OTSB tracking only.	
5. CTS 4.6.1.4.d/ e	The relocation of OPERABILITY tests for MSIV-LCS & MS-PLCS control system instrumentation channels.	CLR	X		X	X	[LA4], [L2] for others Acceptance of these changes are pending the chapter reviewer's approval of the technical justification.	o	N	NRC to review L.2	
6. CTS 4.6.1.4.a/ c	The details of how the SR is performed are relocated to procedures.	CLR	X	X	X	X	[LA2] This is acceptable under the reformat changes of the NUREG.	a			V
7. CTS 4.6.1.4.b/ c	The IST requirements are not specified in ITS but are relocated to Section 5.0.	CLR	X	X	X	X	[LA3] This is approvable per the NUREG format change but what exists to verify this CLB requirement will be fulfilled.	a	N	To be provided on LA matrix for each plant.	

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## CTS to ITS LCO Evaluation

4/15/94

ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	SCAT
			C	G	P	R					
1. ITS 3.6.2.2 LCO	The upper and lower limit of suppression pool does not agree with BASES.	A		X			[B1] It is acceptable to relocate to BASES but there should be agreement. Are fractions or decimals to be used?	o	G	The agree. But we will revise the fractions for clarity.  GGNS to submit Bases changes.	
2. ITS 3.6.2.2 LCO	The level limits of the suppression pool are proposed to be changed without the referenced technical justification that is unavailable for review.	L			X		[A2] This change appears approvable but can not be considered because the basis for the justification is not available and apparently not accepted yet by the NRC staff. Use the CLB limits. The BASES addition is good.	o	N	This is a previous submittal, PY-CEI/NRR-1510L dated June 24, 1992.  This comment is being held open for NRC OTSB tracking only.	
3. ITS 3.6.2.2 Condition A	The CT for suppression pool limits is relaxed from one hour to two hours.	L	X	X	X	X	[L1] This change is consistent with the NUREG. It can be approved provided the justification (which is needed for the SER) explicitly qualifies the three factors of the engineering judgement applied here. Such as what is the incremental (or percent) change in the core damage frequency with the CT increased to 2 hours, 2 days, or 2 weeks?	o	N	OTSB to review L.1.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
1. ITS LCO 3.6.2.4	River Bend states this system does not exist and therefore has deleted the LCO from ITS.	P	-	-	-	X	[P3] This acceptable provided Licensee can further explain where similar function of SPMU system exists in plant. Alternately, an explanation may be that the RHR heat exchanger is oversized to compensate for this missing system.	a	N		
2. CTS 3.6.3.4 LCO Statement	The CTS suppression pool makeup system is Tech Spec'd as two subsystems in ITS.	L	X	X	X	-	CTS-[A1], ITS-[C1] Are these subsystems really independent? The BASES markup seem to imply that the subsystems have a common power supply.	a	C	The C.1 change is not intended to apply that the subsystems have common power supplies. This change was made to eliminate confusion regarding requirements that are more appropriately addressed in Section 3.8.	
3. CTS 3.6.3.4 Action a.	The AOT at 72 hours for one suppression pool makeup line is relaxed to 7 days.	L	X	X	X	-	[L1] This relaxation is consistent with the NUREG format; however, the justification as compared to the ECCS design CTs is inadequate. Rewrite the justification while considering item #2 above.	a	N		

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ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	STATUS
			C	G	P	R					
4. ITS SR 3.6.2.4.1	This SR was replaced by INSERT 36A with plant specific levels.	P	X	-	-	-	[P5] This SR is acceptable; however, shouldn't item (a) state that all gates are open for clarity.	o	C	Item a needs to be met regardless of the gate positions to ensure that the "AND" works properly.  CPS to provide SPMU level calculation for NRC review.	
5. ITS SR 3.6.2.4.1	The methods for determining the level/volume of combined suppression pool volumes are proposed for this SR.	P	-	-	X	-	CTS-[A3], ITS-[B1], [P2] This is the apparent third change pending for this issue. It has become a licensing docketing problem to determine what basis to proceed with this myriad of changes.	o	N	The changes were discussed in two previous submittals, PY-CEI/NRR-1510L dated June 24, 1992, and PY-CEI/NRR-1537L dated November 16, 1992.  This comment is being held open for NRC OTSB tracking only.	
6. ITS SR 3.6.4.2	The temperature limits of the upper pool are proposed to be changed without any technical justification that is available for review.	L			X		[A2] This change can not be approved because the basis for this justification is not available and apparently not accepted yet by the NRC staff. Use CLB instead.	o	N	This is a previous submittal, PY-CEI/NRR-1510L dated June 24, 1992.  This comment is being held open for NRC OTSB tracking only.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
7. ITS SR 3.6.2.4	The word "required" is inserted to modify which gates are to be in this SR.	P			X		[B1] This change implies that additional gates remain installed in the upper pool. Is this true? Otherwise explain reason for word inserted.	o	N	See Bases discussion for SR 3.6.2.4.4 for gate requirements. This is discussed in the previous submittal, PY-CEI/NRR-1510L dated June 24, 1992.  This comment is being held open for NRC OTSB tracking only.	
8. CTS 4.6.3.4.c	The details of how this SR is performed are relocated to the BASES and procedures.	C L B R	X	X	X	-	[LA1] This is acceptable based upon the reformat changes in the NUREG.	a			V

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O U D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
1. ITS 3.6.3.2 CTS 3.6.6/7.3	The LCO OPERABILITY defined in the CTS is significantly different from the proposed ITS.	L	X	?	X	X	[L1]-CTS; [P2]-ITS The results of the HCOG were discussed and implemented by the NRC Staff during the review and preparation of the NUREG. Why is the ITS an "adaption" of the HCOG results? If this is truly generic why not submit as such to the staff for review?	a	G	The NUREG did not reflect the HCOG effort. The NUREG reflected GGNS current TS. The proposed LCO reflects the HCOG effort and has been submitted as a generic change (BWR-16, C.11, C.11, C.12, C.13, and C.14).	
2. ITS 3.6.3.2 CTS 3.6.7.2	The LCO OPERABILITY defined in the CTS is significantly different from the proposed ITS.	L		X			[A1]-CTS; [P2]-ITS The reference material identified in the justification is not available for this review and has apparently not been approved by the NRC. See item #1 above.	o	N	This item should be open tracking the submittal.  This comment is being held open for NRC OTSB tracking only.	
3. CTS 3.6.7.2 Action c.	The AOT for one subsystem inoperable has been relaxed from 7 days to 30 days.	L		X			[A1] This is not an administrative change. This relaxation is not justified. See item #2 above.	o	N	This item should be open tracking the submittal.  This comment is being held open for NRC OTSB tracking only.	
4. CTS 4.6.7.2.a	The SR frequency has been relaxed from 92 days to 184 days.	L		X			[A1] This is not an administrative change. This relaxation is not justified. See item #2 above.	o	N	This item should be open tracking the submittal.  This comment is being held open for NRC OTSB tracking only.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
5. ITS New Condition B	A new Condition B for two subsystems inoperable is proposed.	L	X	X	X	X	[L3] This was considered by the NRC Staff and rejected during the review and preparation of the NUREG. What new PRA work has been done to justify this condition? Why is it not submitted as a generic change for the NRC staff to review?	a	N	BWR-16, C.11.	
6. ITS SR 3.6.3.2.1 SR 3.6.3.2.2	New text in place of NUREG SR text description.	L	X	X	X	X	[C2] This is a generic change - Traveler Required. This is potentially acceptable if a period is placed after "measurement", the phrase "for each igniter" is inserted, and the rest of the sentence is deleted.	a	G	See comment 1. BWR-16, C.12.	
7. ITS SR 3.6.3.2.2	In the note to the SR, the number of igniters inoperable was relaxed from three to four.	L	X	X	-	X	This was not justified. Change back to CTS requirements like PNPP or provide specific justification for the change.	o	P	PNPP markup in error. Current Perry surveillance 4.6.7.3.a.1 states "if more than 3." This is correctly translated in ITS to "4 or more". PNPP markup will be revised to be consistent with other plants.  PNPP to delete "P.3" change.	

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			C	G	P	R					
8. ITS SR 3.6.3.2.3	This SR is proposed to be deleted.	L	X	X	X	X	[B1], [P2] This is a CTS requirement for some plants; however, there is no specific reason for this deletion.	o	N	This is a CTS requirement for GGNS which has an out standing submittal to remove. This change is BWR-16, C13.  This comment is being held open for NRC OTSB tracking only.	
9. ITS SR 3.6.3.2.4 SR 3.6.3.2.5	The text of the NUREG SRs are changed.	L	X	X	X	X	[C3] This is a generic change - Traveler Required. This is potentially acceptable if the word "required" is deleted.	a	C	The LCO does not require all of the igniters to be OPERABLE. If the SR did not have the word "required" in it, even when the LCO required number of igniters were available the LCO would have to be considered "not met" by SR 3.0.1. Therefore, the word "required" is required to be in the SR. This change is BWR-16 C14.	

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CTS to ITS LCO Evaluation

ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	STATUS
			C	G	P	R					
1. ITS 3.6.4.1 Applicability	This SC - LCO has been divided into SC - Operating and Fuel Building - Operating which changes multiple LCOs, Conditions and SRs.	CLBAM	?	?	?	X	[B1] There is no specific justification. This is consistent with and dependent on new LCO for Containment - Operating. Why don't other plants want this?	a	R	See response to LCO 3.6.1.1 comment 1.	
2. CTS 3.6.6.1 Applicability	The addition of SC operability for handling of irradiated fuel in the PC.	P	X				[A4] This change is acceptable but why is change administrative? Doesn't design analysis change and it become more restrictive? Is this an error or oversight in the CTS?	a	C	The addition of SC operability when handling fuel in the PC is considered administrative since this is how CPS currently interprets the requirements. The SC completely surrounds PC and thus PC is inside SC.	
3. ITS 3.6.4.1 Applicability	The SC operability during movement of irradiated fuel is deleted.	P			X		[B1] There is no specific justification. Why is Perry different to <u>not</u> have SC operable during fuel moves, core alterations or OPDRVs like RB which has created a new LCO?	a	P	See response to LCO 3.6.1.1 comment 1.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
4. ITS Condition C Note C.1	Deletion of note "LCO 3.0.3 is not applicable".	CLB			X		[B1] There is no specific justification for this deletion. Even though its part of the CLB in CTS 3.6.6.1, why is Perry different from other plants?	a	P	Due to plant design, PNPP can not move fuel inside their secondary containment. Movement of fuel inside primary containment can only occur with the plant shutdown in MODE 4 or 5. LCO 3.0.3 already has a statement that LCO 3.0.3 is only applicable in MODES 1, 2, and 3. Therefore, by plant design and the language of LCO 3.0.3, the NOTE to Required Action F.1 is not required.	
5. ITS SR 3.6.4.1.1	Changes to CLB vacuum water gauge limit from "0.40" to "0.66" inches.	CLBT			X		[A3] This change has apparently not been accepted yet by NRC even though it is more restrictive. No justification here.	o	P	This is previous submittal, PY-CEI/NRR-1459L, dated March 19, 1992.  This comment is being held open for NRC OTSB tracking only.	
6. ITS SR 3.6.4.1.1	Deletion of this bracketed SR from ITS. In CTS 4.6.6.1, there is no 24 hours verifications only 18 month draw-down capability check for one SGTS subsystem.	CLB		X			[B1] There is no justification for deletion even though keeping SC pressure less than external pressure is written into bases. Is this instrumentation not installed?	a	N		

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			C	G	P	R					
7. ITS SR 3.6.4.1.2	Deletion of verification that door is "sealed".	L	X	X	X	X	[C1], CTS-[LA2], Except RB This is a generic change - Traveler is required. Explain CTS justification which refers to unidentified pressure test on this seal? Also explain why all doors/hatches have different identities? List all!	o	C G P R	BWR-16, C.15.  STET C.1 change on NUREG page 3.6-45 and make Bases addition on NUREG page B 3.6-93.	
8. ITS SR 3.6.4.1.3	Deletion of bracketed exception permitting one door only closed for all plants and there is a CPS difference.	P ?	X	X	X	X	[B1], [P6] for CPS There is no explanation why text is removed for all plants. Is a traveler required? Explain CPS difference?	a	C	This is an issue of plant specific design. Some of these access penetrations only have one door. Also, the NUREG would not allow 1 of 2 doors to be propped open for repairs, etc.	
9. ITS SR 3.6.4.1.4/ 5	Deletion of this SR since it is not part of the CLB.	P			X		[B1], [P7] It is accepted that a system in operation need not be retested, however what system is this? Does this system have a backup? Explain Perry differences?	a	P	System at PNPP is Annulus Exhaust Gas Treatment System (AEGTS). This system has its own LCO (LCO 3.6.4.3) and is described there.	

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## CTS to ITS LCO Evaluation

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ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	STATUS
			C	G	P	R					
10. ITS SR 3.6.4.1.4	Change in SR frequency from 18 months to staggered test basis.	CLB	X	X	-	X	[A2] This can be approved if it is justified. This is a relaxation to CLB via NUREG, however A2 justification can't be used especially for CPS. What is increased risk of failure of the SGTS subsystem when called to operate if not tested every 18 months?	o	C	As stated in the Bases for SR 3.6.4.1.4, this SR verifies SC boundary. Since this is a SC test, it need not be performed on each SGT subsystem. The SGTS subsystem is adequately tested each 18 months per SR 3.6.4.3.3.  CPS to provide an "L" DOC and NSHC for this change.	
11. ITS 3.6.4.1.4	The draw-down time is graphed in Figure 4.6.6.1-1 and proposed relocated.	CLB  R	X				[B1] There is no justification for not stating that draw-down time is $\leq$ 76 seconds which is faster than the 120 seconds in the NUREG. [LA1] This relocation of the Figure to BASES and the procedures is acceptable.	a  o	N  N	As provided in the CPS CTS, the drawdown acceptance criteria is a curved based on system flowrate, inleakage rate, and wind speed. This is adequately controlled by plant procedures to ensure the analysis dose limits are supported.  NRC to review LA.1.	V
12. ITS SR 3.6.4.1.6/ 7	The CLB doesn't specify the SGTS or Fuel Building flow rates.	CLB				X	[P10] Please explain why the plant specific flow condition can't be described in these SRs?	a	R	As described in P10 the SGTS and FB fans do not incorporate inlet flow control vanes like GGNS, CPS, and PNPP. Flow rate is a function of building inleakage (and that which is recirculated in the case of SGTS). This is CLB.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
13. Not used.	NA						NA	a		N	
14. ITS All LCO 3.6.4.1	In accordance with the writers guide, should measurement of vacuum water gauge be "inch" or "inches"?	C L B V S I T S	X	X	X	X	This is editorial, requires general discussion and perhaps a traveler.	a			
15. New LCO 3.6.4.5	New LCO 3.6.4.5 for Fuel Building's containment.	C L B P				X	New LCO needs review if accepted in Item #1 above. This is a place holder.	a			

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			C	G	P	R					
1. CTS LCO 3.6.5.4 3.6.6.2/3	The details related to the design of the system are relocated to the BASES.	CLBR	X	X	X	X	[LA2] This is acceptable to relocate; however, a discussion is required to compare and establish differences and independence in each plant's design. RBS is not justified.	o	R	RBS to provide LA.2 DOC.	
2. ITS 3.6.4.3 Applicability	The OPERABILITY of SGTS is changed depending if fuel is handled in PC or SC.	L ? A ? M ? P ?	X ?	-	X ?	X ?	[B1]-PNPP; [M2]-CPS; [P3]-RBS This is similar to LCO 3.6.4.1, item #2 and #3. Review together. For RBS, P3 does not explain what plant specific differences exist. What is the status of the SGTS when not in Modes 1, 2 or 3?	a	C	See response to LCO 3.6.1.1 comment 1.	
3. ITS 3.6.4.3 Applicability	The LCO applicability is limited to MODE 1, 2, and 3 and hence Conditions C and D are deleted.	P				X	[P3] P3 does not explain the specific plant difference. Is this related to CTS 3.6.1.9.b?	a	R	See response to LCO 3.6.1.1 comment 1.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
4. ITS Condition C & E	The Note stating that LCO 3.0.3 is not applicable is deleted.	P			X		[P4] This needs to be reviewed with item #2 above.	a	P	Due to plant design, PNPP can not move fuel inside their secondary containment. Movement of fuel inside primary containment can only occur with the plant shutdown in MODE 4 or 5. LCO 3.0.3 already has a statement that LCO 3.0.3 is only applicable in MODES 1, 2, and 3. Therefore, by plant design and the language of LCO 3.0.3, the NOTE to Required Action F.1 is not required.	
5. ITS Condition A	A new Required Action A.1 is added.	P				X	[P3] P3 does not explain the specific plant difference.	a	R	At RBS the SGTS is capable of being used to purge the DW or Primary Containment. This is CLB.	
6. CTS 3.6.6.2/3 Action a & b	The relaxation or interpretation on the timing of the suspension of OPDRVs.	L ? A ?	X	X	X	?	[A1] This is a placeholder for discussion occurring in LCO 3.6.4.2.	a	N		
7. ITS New Condition D	The new Condition D for two SGTS inoperable.	A	X	X	X		[A2]-CTS; [C1]-ITS This is acceptable but please clarify in justification where the handling of fuel is taking place in the respective plant designs.	a	C	See response to LCO 3.6.1.1 comment 1. BWR-4, C.8.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
8. CTS 4.6.5.4 or 4.6.6.2/3 a and d.1	The details of how this SR is performed are relocated to the BASES and procedures.	CLB R	X	X	X	X	[LA1] This is acceptable based upon the reformat changes of the NUREG.	a			V
9. CTS 4.6.5.4 or 4.6.6.2/3 d.3	The details of how this SR is performed are relocated to the BASES and procedures.	CLB R	X	X	X	X	[LA1]-CPS; [A3]-RBS & GG; [?]-PNPP For d.3, there is no consistency on how this CLB is handled. If this is relocated to LCO 3.3.6.2, then the Chapter 3.3 reviewer's approval is required. Also, verification that the filter train starts and the isolation dampers open are not specifically addressed. Perhaps this should just be covered in SR BASES description.	o	C G P R	This is addressed by SR 3.6.4.3.3 and provides the overlap for the LSFT for the initiation instruments. The details are considered adequately addressed by "verify the SGT subsystem actuates on an actual or simulated initiation signal."  BWR-6s to provide markup of CTS page to reflect application of LA.1 for start signals being tested.	V
10. ITS SR 3.6.4.3.4	Deletion of this SR from GG and PNPP even though GG has the partial statement in CTS 4.6.6.3.d.4.	CLB	X	X ?	X ?	X	[B1] Does GG and PNPP have a filter cooling bypass or equivalent? Also in SR, should "cooler" be changed generically to "cooling". Lastly, the CTS requires the verification of the manual fan start and manual damper opening whereas the ITS doesn't differentiate.	a	G	SBGT does not have a cooling mode of operation; therefore, this SR is not applicable. The manual fan start in the GGNS CTS is the start of the SBGT fan.	

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## CTS to ITS LCO Evaluation

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ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	SCAT
			C	G	P	R					
1. CTS 3.6.5.2 LCO	The OPERABILITY of the secondary containment during various operational conditions is being relocated to other LCOs.	CLBA? L?				X	[A1] The justification implies this is administrative; however, what LCO covers SC OPERABILITY during fuel movement in PC, CORE ALTERATIONS and OPDRVs?	a	R	RBS maintains Primary Containment during CORE ALTERATIONS, OPDRVs, and fuel handling in primary containment.	
2. CTS 4.6.5.2	Demonstrating fuel building OPERABLE 24 hours before use is stated as equivalent to proposed SR 3.0.4.	CLB				X	[A2] This item is referred to the Chapter 3.0 reviewer for an evaluation.	a	N		
3. ITS SR 3.6.5.2 SR 3.6.5.3	The frequency of these SRs is relaxed from 7 days to 31 days.	L				X	[L1] The justification for consistency does not establish why basis for similarity is acceptable.	a	R	The Fuel Building is part of secondary containment.	
4. ITS SR 3.6.5.4	The bracketed SR that is deleted.	L				X	[B1] The CTS 4.6.5.2.c clearly requires a least one door closed in an implied two door designed access passage.	a	R	All accesses to the Fuel Bldg. have only one door.	
5. CTS 4.6.5.2.d	This CTS is indicated as being covered by LCO 3.6.4.2 Conditions A and B.	L				X	Explain this determination?	a	R	The Fuel Building is part of secondary containment.	

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			C	G	P	R					
6. ITS SR 3.6.4.5.4 SR 3.6.4.5.5	These SRs are deleted.	L				X	Explain why these SRs are not here or reference is not made to same SRs in LCO 3.6.4.1?	a	R	Mark up level of detail.	

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			C	G	P	R					
1. ITS 3.6.4.7 LCO	The LCO statement is incorrectly numbered as LCO 3.6.4.9.	A				X	Correct typo.	a	R	Fix typo. (Typed version checked and is OK)	
2. CTS 3.6.5.6 and ITS 3.6.4.7	The BASES are to define the independence of the subsystem.	A				X	[no justification] Please add statement to show the independence of the subsystem.	a	N		
3. CTS 4.6.5.6 b and e.1	The details of how these SRs are performed are relocated to the BASES and plant procedures.	C L B R				X	[LA1] This is acceptable based upon the reformat changes of the NUREG.	a			V
4. ITS SR 3.6.4.7.5 CTS 4.6.5.6.e. 4	The CTS verifies manual opening of dampers and the fan can be manually started.	A ? L ?				X	[no justification] The ITS requirement does not differentiate between a manual or automatic opening/start of these components. This is similar to item in LCO 3.6.4.3.	a	R	Wording is consistent with similar SR for SGTS.	
5. CTS 4.6.5.6 c, d, e.2,e.3, f and g	These CTS SRs are being relocated to ITS LCO 3.3.6.2 and 5.7.13.	C L B R				X	[A1] These items are pending the review of Chapter 3.3 and 5.0 Reviewers' approvals.	o	N	This comment is being held open for NRC OTSB tracking only.	

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			C	G	P	R					
1. CTS 3.6.2.3.a and .b	The details of air lock OPERABILITY are relocated to SRs, BASES, procedure and administrative controls. Maintenance on systems result in SR controls being placed in procedures.	CLBR	X	X	X	X	[LA1], [LA2] This is acceptable under the reformat changes of the NUREG.	a			V
2. ITS "new note" - Insert 55A	A new note is proposed to enter LCO 3.6.5.1 when excessive air lock leakage exceeds overall drywell criteria for OPERABILITY.	AM	X	X	X	X	[C1] This is a generic change - Traveler Required. This is approvable with discussion. Are BASES of LCO 3.6.5.1 adequate? Evaluate with changes proposed on defining the drywell leakage limit.	o	N	BWR-16, C.16.  This comment is being held open for NRC OTSB tracking only.	
3. ITS Action Note #1 and Condition A Note #2	Note #1 permits entry and exit to perform repairs. Note #2 of Condition A permits entry and exits for a 7 day period.	L	X	X	X	X	CTS - [L3], [L4] General discussion required with LCO 3.6.1.2. Explain one hour per year limitation for Perry and why RBS has only MODE 3 applicability for 7 day period?	a	N		
4. CTS 3.6.2.3 Action a.2	A dedicated individual assures both doors are not open at same time.	CLB				X	[LA3] Why has this been categorized as less restrictive? Does it have to do with being applicable now for MODES 1 and 2? A rewrite of justification is required.	a	N		

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			C	G	P	R					
5. ITS Condition A & B , Note #1 and Condition C	This note #1 for the conditions is a clarification of what condition is applicable when not in Condition C. There is only one air lock for this LCO.	L	X	X	X	X	[A2] This is a reformat change per the NUREG, however with only one air lock, then the note is unnecessary when two doors inoperable is added to Condition C. Traveler Required?	a	G	<p>Condition A is entered when the first door in the airlock becomes inoperable. At which time the Completion Time clocks would start. When the second door in the airlock becomes inoperable, in addition to Condition A being applicable Condition C would be applicable. When one of the inoperable doors was repaired Condition C would be exited and Condition A would still apply with Completion time clocks for the Required Actions based on the first inoperability.</p> <p>The reason for Note 1 is that when the second door becomes inoperable the Required Actions for Condition A (or B) can not be met but Condition C provides the appropriate Required Actions. When one of the doors is restore to OPERABLE status the Required Actions of Condition A (or B) must be met but you should not be allowed to restart your clocks for performing the Required Actions like you would if Condition A (or B)</p>	

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## CTS to ITS LCO Evaluation

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			C	G	P	R					
6. CTS 3.6.2.3.b	The test pressure for the overall air lock leakage test is not P <sub>a</sub> .	CLBL	?	X	?	?	[L1] for GG The test pressure for GG should be 22 psig based upon Table 6.2-8 of USAR. Peak pressure is after uncovering second row of vents, therefore justification needs rewriting. What is test pressure for other plants?	a	G	Test pressure is Drywell pressure minus containment pressure. CTS SR 4.6.2.3 identifies this required test pressure as 11.5 psig.  The L.1 discussion is extraneous.	
7. ITS SR 3.6.5.2.1 and SR 3.6.5.2.3/ 4	There is a pressurized air lock test in addition to the overall air lock test per CLB. New ITS needs change to accommodate. Also relaxation from 6 months to 18 months is already in NUREG.	CLBL	X	X	X	X	CTS - [L6], ITS - [P4] This requires a generic traveler. This needs a general discussion. Grand Gulf is the closest to solution. Perhaps staff concurrence is needed on the non-Applicability of Appendix J, the relaxation and new changes to NUREG.	a	N		
8. CTS 3.6.2.3 Action c and 4.6.2.3.d	Deletion of TS for two OPERABLE air lock door inflatable seal system pressure instrumentation channels.	R		X		X	[LC1] Acceptance of these changes are pending the chapter reviewer's approval of the technical justification.	a	N		
9. ITS SR 3.6.5.2.5	The NUREG SR doesn't match the CLB for all plants with inflatable seals.	CLB	-	X	X	X	There should be a traveler for this proposed change. Also should the words "equivalent to" be deleted from the SR text, since it is "not greater than"?	a	N		

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- LCOs -	All proposed changes to the ITS LCO are approved. There are no LCO items requiring additional discussion.						NA	a		NA	

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			C	G	P	R					
1. ITS 3.6.5.6 LCO	There is no CTS for drywell vacuum relief and Licensee states that River Bend does not have this system.	P	-	-	-	X	[P3] It is acceptable to delete this LCO if the Licensee explains how after the LOCA, the drywell negative pressure gradient is mitigated or analyzed to be of no consequence.	a	N		
2. ITS 3.6.5.6 CTS 3.6.5.3	The BASES state that the only safety function of the system is to provide drywell to containment isolation.	P	-	-	X	-	[P2]-ITS; also see [L4]-CTS LCO 3.6.5.3 already provides DIV function. Justification implies PNPP design doesn't require a drywell vacuum relief system contrary to USAR Section 6.2. If this is true, why is there a CTS and ITS LCO? Otherwise, please explain how after the LOCA, the drywell negative pressure gradient is mitigated or analyzed to be of no consequence.	o	P	Perry is reviewing this issue, and will respond later.	
3. ITS 3.6.5.6 LCO	Grand Gulf LCO covers two separate systems as one drywell vacuum relief system.	P	-	X	-	-	[B1] The BASES imply that drywell purge vacuum relief subsystem and drywell purge subsystem of LCO 3.6.3.3 maybe the same system. Contrary to BASES-REFERENCES, the UFSAR in Chapter 6.2 does not cover the drywell vacuum relief.	a	G	They are essentially one system. UFSAR page 6.2-94.	

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			C	G	P	R					
4. ITS 3.6.5.6 LCO	The markup to the BASES imply that LCO 3.6.3.3 OPERABILITY is dependent upon at least two 10-inch lines being open.	P	X	-	-	-	[P2] Explain plant specific design that results in major markup of LCO and its affect upon LCOs 3.6.3.3 and 3.6.5.3.	a	C	The CPS design is post-LOCA vacuum relief subsystems, not drywell purge subsystems (even though that is the function that it serves). The design is four separate penetrations, each with two check valves in series and no MOV isolation valves. Three subsystems were assumed to open in the containment loading analyses. This supports the Bases for Action A.	
5. ITS ACTIONS NOTE	A new Actions Note to alert TS users that excessive valve leakage also affects Drywell OPERABILITY in LCO 3.6.5.1.	A	X	X	X	-	[C2]-ITS; [A3]-CTS This is a generic change - Traveler Required.	o	N	BWR-16, C.16.  This comment is being held open for NRC OTSB tracking only.	

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			C	G	P	R					
6. ITS Conditions A thru G	The phrase "for reasons other than Condition A proposed to be added to all Conditions for clarification.	A	X	X	X	-	[C1] This is a generic change - Traveler Required. It is acceptable to clarify which Condition to be entered. This phrase to be added seven times for GG. Other ways are to add to BASES, add another limiting note to Condition A, or reword like CTS. Alternately, this Condition for DIV function could be deleted and/or modified for LCO 3.6.5.3.	o	N	BWR-16, C.19.  This comment is being held open for NRC OTSB tracking only.	
7. ITS Condition A	The plant specific names of the drywell vacuum relief system are identified.	P	X	X	X	-	[C3] This is a generic change - Traveler Required. It is acceptable to provide plant specific terminology so shouldn't these names be in brackets. Review items #1 -#4 together.	a	N		
8. ITS Condition A,B & C (old E)	Various text changes to Condition Statements to fit plant specific design. Cond. A - "with one or more valves" Cond. B - "one subsystem to restore" Cond. C - "all subsystems inoperable"	P	X	-	-	-	[B1], [C3], and [P2] not justified  Delete phrase - adds confusion. Remove Plurality Restore at least two subsystems OPERABLE.	a	C	1. This was added to adress the situation where SR 3.6.5.6.1 is failed due to one valve not closed yet the subsystem is closed. 2. Agree. 3. Change to restore... subsystems to OPERABLE status.	

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			C	G	P	R					
9. ITS New Condition C (old E)	In CTS 3.6.5, Action a, the AOT of 72 hours for both valves in subsystem inoperable relaxed to 30 days and all subsystems inoperable (Loss of function) permitted 72 hours before unit shutdown.	L	X	-	-	-	[L4], [L6] The justification for L4 is appears acceptable but L6 is different from the ITS markup of the previous item #8. Please clarify.	a	C	See response to Item 8 above.	
10. ITS Condition B CTS 3.6.5.3 Action a	Various text changes to fit plant specific design. Relaxation of CTS AOT of 72 hours for one subsystem inoperable to ITS CT of 30 days for one or <u>two</u> subsystems inoperable.	P	-	-	X	-	[B1]-ITS; [L4]-CTS Review with item #2 above.	o	P	Perry is reviewing this issue, and will respond later.	

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			C	G	P	R					
11. ITS Condition D CTS 3.6.5 Action c	ITS contains a condition for two inoperable subsystems of drywell purge vacuum relief.	L	-	X	-	-	[L7]-CTS Explain how CTS Action c is equivalent to ITS Condition D? Why do two inoperable subsystems of drywell purge vacuum appear more severe than two inoperable subsystems of post-LOCA vacuum relief? What happens if two post-LOCA subsystems isolation MOVs are closed per Condition A and then two drywell purge subsystems become inoperable?	o	G	<p>CTS Action C corresponds to ITS Condition E.</p> <p>Each drywell vacuum relief subsystem has its own 10 inch line into the drywell. The two post LOCA vacuum relief subsystems share a 10 inch line. DBA analysis assume two 10 inch lines are OPERABLE; therefore two drywell purge vacuum relief subsystems inoperable is more severe than two post LOCA subsystem inoperable.</p> <p>When the post LOCA subsystems are closed by Condition A, Condition A no longer applies since Condition A is "subsystems not closed." If the subsystem is made inoperable by the method that it was closed then for your example Condition G would apply because the subsystems are inoperable for reasons other than being open.</p> <p>The C3 change to Condition A is inappropriate. GGNS will revise to remove.</p>	

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			C	G	P	R					
12. CTS 3.6.5 and 3.6.5.3	The CTS specifies OPERABILITY of vacuum breakers and now ITS specifies vacuum relief subsystems are OPERABLE.	L ? T ?	-	X	X	-	[L1] and [L4]-PNPP only Explain how change is less restrictive versus more restrictive? Also for PNPP, explain apparent last sentence contradiction in L1 with the second sentence of L4.	o	P	Perry is reviewing this issue, and will respond later.	
13. CTS 3.6.5 Footnote (* )	Deletion of reference to Special Test Exception 3.10.1.	A	X	-	-	-	[A4] This is pending the review of the Chapter 3.10 reviewers approval.	a	C	Cross references to STEs have been deleted throughout the TS.	
14. ITS SR 3.6.5.6.1	The addition of two new notes to SR 3.6.5.6.1.	A	X	X	X	-	[C6]-ITS and [A5]-CTS, CPS only It is implicit that valves required to be closed will have to be opened in order to perform certain SRs and to perform their intended function. Why are these notes required here and not other places in the ITS? This does not appear to be a generic change.	a	C	See BWR-15, C.7.	
15. CTS 4.6.5/4.6. 5.3 b.1.a	The details for performing this SR are relocated to the procedures for performing system functional tests.	C L B R	X	X	X	-	[LA2] It is acceptable to relocate per the reformat changes of the NUREG; however, the justification of what is exactly being relocated needs revision.	o	P	PNPP to provide an LA.2 DOC.	V

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			C	G	P	R					
16. CTS 4.6.5/4.6. 5.3 b.1.b, b.2.b, b.3	The CTS requirements for Actions required and performance of SRs are relocated.	CLBR	X	X	X	-	[LC1] These several items are pending the Chapter 3.3 reviewers approval.	a	N		
17. ITS SR 3.6.5.6.3 CTS 4.6.5(.3) b.3	The opening setpoint for the isolation valve on the vacuum relief subsystem is not specified in the ITS.	CLB	-	X	X	-	[P4]-PNPP Why does GG not specify this CTS requirement in SR 3.6.5.6.3 like PNPP?	o	G	GGNS to provide markup.	

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			C	G	P	R					
5. CTS 4.6.1./1.2 .a ITS SR 3.6.1.10. 1	The deletion of note pertaining to penetrations not capable of being closed by OPERABLE PCIVs.	P			X	X	CTS-[A5], ITS-[B1] Why are these plants different in their ITS markup? Shouldn't these requirements be identified in LCO 3.6.1.3 rather than in 3.6.1.10?	a	R	See response to LCO 3.6.1.1 comment 1.  RBS and PNPP utilize Primary containment as a boundary during CORE ALTERATIONS, OPDRVS, and handling fuel in the Primary Containment. 3.6.1.3 PCIVs does not require operability of all the necessary valves for establishing the boundary.	
6. ITS SR 3.6.1.10. 1 CTS SR 4.6.1.2.a SR4.6.1.1 .2a	Specifies frequencies that PC penetrations must be verified closed.	P			X	X	CTS-[A4], ITS-[B1] Why is the Frequency for River Bend 24 hours rather than 31 days for other plants?	o	R	RBS originally proposed a 31 day frequency in 1984. As a result of NTOL the frequency was changed to 24 hours. PNPP developed their Primary Containment - Shutdown LCO after RBS and was allowed a 31 day frequency.  RBS to provide a "L" to justify change to 31 days.	

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			C	G	P	R					
1. CTS LCO 3.6.1.1.2 LCO 3.6.1.2 ITS LCO 3.6.1.1 LCO 3.6.1.10	LCO 3.6.1.1 title changed to include "operating" per plant terminology and new LCO 3.6.1.10 (Supplement) added for "shutdown".	AM	?	?	X	X	[P5 of 3.6.1.1 and P2 of 3.6.1.10] The format for all plants shall be the same. LCO 3.6.1.10 only contains one condition and one SR which could be included into LCO 3.6.1.1 and would look similar to LCO 3.6.4.1 of the NUREG. Otherwise CPS and GG should adopt two LCO format. This would maintain the NUREG format, consistency between plants. Traveler?	a	C	See response to LCO 3.6.1.1 comment 1.	
2. CTS 3.6.1.2 Applicability Footnote *	The deletion of the Special Test Exception reference.	A				X	[A2] This is pending the acceptance by the Chapter 3.10 Reviewer.	a	N		

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3. CTS LCO 3.6.1.1.2 Applicability	Deletion of operability linkage to inclined fuel transfer system and CTS LCO 3.6.1.2.	P			X		[LA2] Shouldn't these requirements be identified in LCO 3.6.1.3 rather than in 3.6.1.10?	a	P	Maintaining the fuel transfer discussion in the Primary Containment - Shutdown specification was done for consistency with present CTS. Since nothing about this flexibility is being changed by the ITS, the need to change locations was not deemed necessary. Operators are used to finding these flexibilities in the present Primary containment - Shutdown spec. Maintaining it in the ITS shutdown spec will aid operators in finding information.	

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4. CTS LCO 3.6.1.2 & 3.6.1.1.2 Footnote# /**	Various exceptions to valves and pathways which may be opened under administrative controls and for testing.	P			X	X	[LA1], [A3] Should these requirements be identified in LCO 3.6.1.3 rather than in 3.6.1.10?	o	P R	Maintaining the fuel transfer discussion in the Primary Containment - Shutdown specification was done for consistency with present CTS. Since nothing about this flexibility is being changed by the ITS, the need to change locations was not deemed necessary. Operators are used to finding these flexibilities in the present Primary containment - Shutdown spec. Maintaining it in the ITS shutdown spec will aid operators in finding information.  RBS and PNPP to provide Bases changes to discuss SR 3.6.10.1 Notes. Also, PNPP will revise 12 lines back to 6 or provide an "L" DOC and NSHC.	

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			C	G	P	R					
5. CTS 4.6.1./1.2 .a ITS SR 3.6.1.10. 1	The deletion of note pertaining to penetrations not capable of being closed by OPERABLE PCIVs.	P			X	X	CTS-[A5], ITS-[B1] Why are these plants different in their ITS markup? Shouldn't these requirements be identified in LCO 3.6.1.3 rather than in 3.6.1.10?	a	R	See response to LCO 3.6.1.1 comment 1.  RBS and PNPP utilize Primary containment as a boundary during CORE ALTERATIONS, OPDRVS, and handling fuel in the Primary Containment. 3.6.1.3 PCIVs does not require operability of all the necessary valves for establishing the boundary.	
6. ITS SR 3.6.1.10. 1 CTS SR 4.6.1.2.a SR4.6.1.1 .2a	Specifies frequencies that PC penetrations must be verified closed.	P			X	X	CTS-[A4], ITS-[B1] Why is the Frequency for River Bend 24 hours rather than 31 days for other plants?	o	R	RBS originally proposed a 31 day frequency in 1984. As a result of NTOL the frequency was changed to 24 hours. PNPP developed their Primary Containment - Shutdown LCO after RBS and was allowed a 31 day frequency.  RBS to provide a "L" to justify change to 31 days.	

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			C	G	P	R					
1. CTS 3.6.5.2	The Figure 3.6.5.2-1 is being deleted.	P	-	-	X	-	[LA1] The information presented in the Figure is easier to determine rather than the text presented in the BASES. Why not relocate the Figure to the BASES? Also what is the TSPS 0068 in the right hand margin?	a	P	Will consider relocating the figure to the Bases. The TSPS is not part of ITS submittal and should be ignored.	

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			C	G	P	R					
2. CTS 3.6.5.2 Action a	The CTS requires temperature and relative humidity be within limit in 8 hours or enter shutdown track.	L	-	-	X	-	[A2] This is not an administrative change. The ITS permits continued operation after RHR containment spray is deactivated. This appears to be a safety problem.	o	N	If ACTION A is taken this would result in LCO 3.6.1.12 being met. However, it would also result in the inoperability of both Containment Spray subsystems. Thus LCO 3.6.1.7 would apply which does require a plant shutdown. If no action is taken per ACTION A within the 8 hours, then CONDITION B requires a plant shutdown. If the temperature/humidity is restored within the 8 hour period the CONDITION A is exited as it would be today.  The AOT for 2 sprays inop is 8 hours. This should be an "L".  OTSB to review acceptability of the proposed change.	

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			C	G	P	R					
3. CTS 3.6.5.2 Action b	"All other times" of operational conditions per CTS have been defined in ITS as only refueling in PC, CORE ALTERATIONS, and OPDRVs.	T ? L ?	-	-	X	-	[M1] This appears to be less restrictive rather than more restrictive. Does PNPP move fuel in PC in MODES 1, 2 & 3? What can occur during MODE 4?	o	N	ITS is consistent with CLB and CTS. See the Applicability to CTS 3.6.1.1.1 and 3.6.1.1.2.  OTSB to review acceptability of the proposed change.	
4. ITS Condition B	This new Condition B does not follow NUREG format.	T ? L ?	-	-	X	-	Please explain Condition B and BASES Applicability. RHR containment spray is only required in MODES 1, 2, & 3, so why is this LCO applicability during other conditions?	o	N	See answer 5 to 3.6.1.11.  OTSB to review acceptability of the proposed change.	

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## CTS to ITS LCO Evaluation

4/15/94

ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	SCAT
			C	G	P	R					
1. ITS LCO Statement	Exempts containment vacuum breakers from LCO.	AM	?		X		[C6] The justification appears to state that this is a dual function valve but so are many others which have a functional capability and also an isolation capability. This LCO covers the isolation capability and Note 3 assures operators are alerted to PCIVs system operability functions which are covered in this case in LCO 3.6.1.11. This is not covered very well in the BASES. See CPS CTS [LA6] - seems lacking.	o	N	Justification is that containment vacuum breakers have their own Specification to deal with their OPERABILITY. This justification is stated in the C6 DOC. LCO 3.6.1.11 controls the isolation function of the containment vacuum breakers.  BWR-15, C.6.  This comment is being held open for NRC OTSB tracking only.	
2. ITS Applicability vs CTS Applicability	Various differences in applicability of certain CTS specific systems for all plants. See Table at end of this for descriptions and comparison.	CLB? T?	X	X	X	X	[A4], [A11], [M1] Discuss Table. These can be approved provided there are no BWR/6 design differences. Explain the selection differences between plants. Why was RB CTS [M1] not included in ITS?	o	P	PNPP to mark up SR 3.6.1.10.1 to allow opening of Fire Protection valves under administrative controls allowed by CTS.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
3. CTS 3.6.4.1 Applicability CTS 4.6.1.1 footnote **	Addition of Mode 4 and 5 for certain CTS specific systems and new RHR shutdown cooling valves, limitation of operability of SC bypass leakage valves. Deletion of unique applicability for Reactor Water Cleanup System. From 4.6.1.1, where are valves 1HG016 and 1HG017?	C L B T ? L ?	X	?	?	?	[A16], [L9], [M1], [P12] These can be approved provided there are no unique BWR/6 design differences. Why don't other plants want this? Also rework justification to explain why CTS requirement was there. Also identify what "proposed changes" in justification permit this deletion?	a	N		
4. ITS Note #1 & BASES	Deletion of bracketed exception which keeps certain purge valves closed.	A T ?	X	X		X	[B1], Perry [P5] and CTS [A8] BASES should include justification statement to state that purge valves are qualified to close under accident conditions. Perry is not.	o	C G R	In general all of the automatic PCIVs are qualified to close when they are required to close. This note is only need if you are trying to explain why you can't open these valves like you can all of the other PCIVs.  CPS, GGNS, and RBS to provide markup and "L" DOC & NSHC. DOC is to delete Note 1 [], thus allowing purge vlvs to open under administrative controls.	

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			C	G	P	R					
5. CTS LCO 3.6.1.9 ITS Note #1	LCO statement states 20-inch purge valves to be kept closed.	CLB		X			[A8], CTS-[L1], & footnote (*) Is GG qualified? The Bases do not explain the reason for keeping these valves closed. Is it CLB? There needs discussion by all on length of time purge valves are open versus the time valves are closed under note #2 of SR 3.6.1.3.1. CLB required SR every 92 days but NUREG permits 184 day Frequency per resolution of Generic Issue B-20, "Containment Leakage Due to Seal Deteriation"	o	G	Yes the valves are qualified. This restriction is CTS 3.6.1.9.  GGNS to provide a markup of SR Note 2 and Action Note 1.  ITS Containment Purge and Drywell Purge Notes 2 to SR 3.6.1.3 & SR 3.6.5.3	
6. CTS LCO 3.6.1.8/9	Deletion of time limitation for opening certain size supply/exhaust valves.	RCLB	X	?	X	X	[L2] This CLB requirement is being replaced with "specific criteria" not defined, nor told where located.	a	N	OTSB action to review L.2. Also, see SR Note 2. L2 justifies replacing time limits on opened purge valves.  May 13, 1994-iSTS Bases support proposed changes to CTS. L2 is adequate.	
7. ITS Note #4	Wording change for proposed LCO 3.6.1.10	CLB			X	X	[P9] Dependent upon change approved for LCO 3.6.1.1.	a	C	See response to LCO 3.6.1.1 comment 1.	

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			C	G	P	R					
8. ITS Note #4	The addition of limitation for Actions to only apply in Modes 1, 2, and 3.	L	X	X	X	X	[C7] Dependent upon change approved for LCO 3.6.1.1.	a	C	See response to LCO 3.6.1.1 comment 1.  BWR-15, C.3	
9. CTS 3.6.4 LCO footnote	This footnote on opening closed isolation on CPS & GG has been adopted by P & RB. This shows up as Note #2 in SR 3.6.1.3.3 &.4 and in LCO for DIVs.	C L B L ?	X	X	X ?	X ?	[A1] Discussion is required for all. The key word missing is "intermittent" from CTS. This is a relaxation for RB.	a	R	The CTS requirements are consistent with ITS SR 3.6.1.3 Note 3 which does contain the word "intermittently".	

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			C	G	P	R					
10. ITS Condition A & C	The Applicants propose combining Condition A and C and no longer pursue longer CTs for Condition C. Major change and several issue and items related here.	A M ? ? T ?	X	X	X	X	[C8], [C10] The Condition C should be retained to cover GDC 57 penetrations and to cover one or more purge valves open where CTS permits only 4 hours versus Condition B only allows 1 hour.	a o	N	For penetration flow paths with only one isolation valve (eg, GDC 57 penetrations) Condition A will apply allowing 4 hours to isolate. Condition B only applies if two PCIVs are inoperable in a flow path; therefore, Condition B will never apply to flow paths with only one PCIV. Purge valve leakage is covered by Condition D, one purge valve inoperable (for those plants which can not open the valves this includes the valves being open) Condition A is entered (4 hours), and for two purge valves inoperable Condition B is entered (1 hour).  GGNS should have marked the Condition B entry as a more restrictive change.  C.8 is acceptable. C.10 is BWR-15, C.4. This comment is being held open for NRC OTSB tracking only.	

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## CTS to ITS LCO Evaluation

4/15/94

ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
11. ITS Condition B	Deletion of Note	A M ? L ? T ?	X	X	X	X	[C14] This note should stay and be rewritten and perhaps a rewritten note on Condition should explicitly exclude PCIVs under GDC 57.	a	G	See response to comment 10 above.	
12. ITS Condition A, B, and C	It is not clear whether Conditions apply to valves open or unable to close as described in CTS 3.6.1.8/9, Action a.	C L B L ?	X	X	X	X	This is an apparent relaxation which is not justified. See [M2] of RB.	a	N		
13. ITS Condition A, B and E	Word changes in Required Actions A.1, A.2 and B.1. Also in E.1 and E.2.	A M ? L ? T ?	X	X	X	X	[C9], [C11] "Isolation barriers" can be used instead of "isolation devices", except isolation barrier cannot mean "a check valve with flow thru the valve secured". All references to devices shall be changes to barriers. This eliminates confusion with active and passive devices.	o	N	BWR-15, C.1 and C.5 still open.  This comment is being held open for NRC OTSB tracking only.	

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			C	G	P	R					
14. CTS LCO 3.4.7 Action b.	The CLB to isolate by deactivation is expanded to use of other manual valves, etc.	CLB	X	X	X	X	[L5] The BASES should be written to explain isolation method is deactivation only unless there is method to only use manual valves inboard of affected MSIV.	a	N	OTSB to evaluate L.5.  May 13, 1994-acceptance of the criteria "not affected by a single active failure" is accepted by the Bases, but an additional criteria is that the valve isolating the penetration must be the valve closest to primary containment.	
15. ITS Condition A	Word change in CT of Required Action A.2 of "and" to "or". Also see SR 3.6.1.3.2(3) and SR 3.6.1.3.3(4).	A	X	X	X	X	[C1], [C12] There is an apparent difference whether "and" is used on "outside" and "or" is used on "inside" which is not obvious to me. The use of "or" seems to satisfy both.	a	G	The "or" indicates that the valve must be in one of these areas. The "and" would result in this frequency not applying to any valves since the valve would have to be in the containment, drywell and steam tunnel.  BWR-16, C.1.	

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4/15/94

ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
16. ITS Condition A	Notes to NUREG Required Actions, A.2, C.2, E.2 and SR 3.6.1.3.3/4	L	X	X	X	X	[L1], [L2] This change needs general discussion. This new test permits verification of penetrations isolated by administrative "means" not "controls" and exempts certain high radiation areas. When will these isolated penetration ever get inspected and where is it stated? Access to high rad areas does not need a radiation work permit (RWP) for every entrance per proposed changes to Section 5.0. So what are the controls in place?	a	N		
17. ITS Condition A	Excess Flow Check Valves added with extended Completion Times from 4 hours to 12 hours.	C L B L	X				[L8] CLB states isolation in 4 hours. There is no engineering justification to support this increase. This rejection meets CLB for Condition A or like CPS-CTS it should be a new Condition with a 4-hour CT.	a	C	This change is consistent with the BWR-4 standard NUREG 1433.	
18. CTS 3.6.1.9 Action A	A CTS requirement for inoperable 36" valves says "close and/or seal" contrary to the Condition A which says "close".	C L B	X	X		X	There is no justification for this relaxation. If the valves are sealed closed then BASES need changing and SR 3.6.1.3.1 will apply.	w	N		

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			C	G	P	R					
19. ITS Condition: D CTS 3.6.1.2	Deletion of Secondary Containment bypass leakage rate.	CLB		X			[C10] Explain how Grand Gulf does not have any leakage pathways to the Secondary Containment or where is this requirement fulfilled elsewhere.	a	G	UFSAR Table 6.2-42 reviews all of the bypass leakage paths and shows GGNS does not have any. Design and CLB.	
20. ITS Condition E	Text changes to Completion Time for Required Action E.2.	A	X	X		X	[C5], [P20] These changes appear to be acceptable but Perry requests addition of "primary" in two locations. Why do others not want this? A traveler is needed.	a	C G R	C.5 is acceptable [BWR16, C.2]. For P.20: CPS, GGNS, and RBS agreed to add "primary" in two locations to match PPNP submittal. Docket submittal.	
21. CTS 3.6.1.9 Action C	There is reference in the CTS to a New Condition E that is not in the ITS 3.6.1.3	?				X	[L4] Typo?	o	R	L.4 should refer to Cond D. RBS to provide corrected DOC L.4.	
22. ITS Conditions F,G,H and I	Renumbering of Conditions is dependent upon Major changes to Conditions	A	X	X	X	X	[P2] These changes are dependent upon Major changes to Conditions A, B, and C.	a	C	See comment 10.	
23. ITS Condition F	Deletion of Required Action Note stating "LCO 3.0.3 is not applicable" and also "secondary containment" is deleted.	P			X		No justification provided.	a	P	See response to LCO 3.6.1.1 comment 1. <i>delete 3.0.3 N/A note bec. fuel handled in prim cntmnt during Mode 4 &amp; 5.</i>	

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			C	G	P	R					
24. ITS Condition G & H	These conditions on movement of irradiated fuel and core alterations are deleted.	P				X	[B1] No discussion why not applicable. <i>LCO 3.6.1.10 covers PCIVs for core ats/irrad fuel, F008/F009 vlvs needed for OPDRVS are Condition I.</i>	a	R	RBS PCIV requirements during fuel movement in primary containment or during CORE ALTERATIONS are covered by SR 3.6.1.10.1, "Verify each penetration flow path, required to be closed during accident conditions, is closed".	
25. ITS Condition I	Deletion of Applicability during OPDRVs.	P	X			X	No justification provided.	o	C	In Cond H, STET the "MODE 4 or 5 or during.....OPDRVs" CPS to provide revised ITS markup.	
26. ITS SR 3.6.1.3.1	Deletion of the SR because the purge valves are qualified.	P	X	X		X	[B1] A statement to this effect must be in the BASES. Please see first paragraph of ACTIONS.	a	C	CPS believes such a statement would confuse Operations personnel to have an explanation for why there is not a requirement in the Tech Specs.	

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			C	G	P	R					
27. ITS SR 3.6.1.3.1/2	a. Addition of special testing. b. Deletion of concurrent opening of DIVs. c. Addition of valves to be allowed open.	CLBL	X	X	X X	X X	[P3], [P14], [P16], CTS-[L1], [L2] There is no consistency between CTS and SR notes changes and BASES for all plants for these relaxations. Revise with similar item for DIVs.  [P3] - OPEN, ALL OTHERS ARE CLOSED	a	N	This is design and CLB for the plants.  OTSB to review P.3. Ask staff to about meaning of "Special Testing" in O'Connor SER.  May 13, 1994-Closed for NRC, SER added the special testing limit to the LCO.	
28. ITS SR 3.6.1.3.1 thru .12	There are differences of opinion regarding SR Applicability by Notes limiting SR to only Modes 1, 2, and 3.	L			X	X	[B1], [P4] Discussion required. [P4] depends upon resolution of new LCO 3.6.1.10.	a	C	See response to LCO 3.6.1.1 comment 1.	

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			C	G	P	R					
29. ITS SR 3.6.1.3.4/5 SR 3.6.1.3.7 LCO 3.4.7	NUREG SR 3.6.1.3.7 deleted and proposed to be added to NUREG SR 3.6.1.3.6.	CLB	X	X	X	X	[C13], CTS [L7] Need to discuss with NRR Staff because CLB is plant specific values for all plants. A traveler would be required if NRC accepted.	r	G	Many isolation valves (not just the MSIVs) have specific values for their isolation times SR 3.6.1.3.5 (NUREG) will test all of these times.  NRC did not generically agree with C.13 change. BWR-6 plants to evaluate rejection. OTSB to markup ITS	
30. ITS SR 3.6.1.3.9	NUREG SR 3.6.1.3.9 is deleted for verification that combined leakage rate for all SC bypass paths is not exceeded.	P		X			[B1] Justification not provided with [B1]. How is Grand Gulf design different from others?	a	N	See SR 3.6.1.1.  CLB see #19	
31. ITS NUREG SRs 3.6.1.3.9/11	These SRs for SC bypass path leakage rate and hydrostatic tested lines leakage rate have new SR frequency.	P	X		X	X	No justification provided here for change from 18 months. Assume it is contained in LCO 3.6.1.1. Clarify why CLB changed.	a	C	See LCO 3.6.1.2 justification L.1.  BWR-14, C.4 and C.5.	
32. CTS 3.6.1.2	Action e applying just prior to going above 200°F.	T	X	X	X	X	[M1] This is acceptable but justification needs clarification.	w	N		

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			C	G	P	R					
33. CTS 3.6.1.2	Action b relocates the requirement to verify combined B & C leakage tests are less than 0.6 L <sub>s</sub> every 24 months, except for other tests.	CLB R	X	X	X	X	[A1] This SR should be in ITS so that excessive leakage action statement can be entered.	a	N	See SR 3.6.1.1.1.  This is an Appendix J requirement.	
34. CTS 4.6.1.2/3 f/h/i	This SR for MSIVs and hydrostatically CIVs covers tests every 18 months.	CLB	X	X	X	X	[L1] This requirement is changed from 18 to 24 months based on a letter to NRC not yet approved.	a	N		
35. CTS 4.5.1.2.g	This SR for continuous leakage monitoring systems are tested every three years.	CLB	X	X	-	X	This three year SR should be in the ITS. Traveler is required?	a	C	This provision is included in App. J. This is included in SR 3.6.1.1.	
36. ITS New SR- Insert17A	New SR for in-leakage rate to MS-PLCS and PVLCS.	CLB				X	[P14] New SR is needed, however discussion is requested.	o	R	P14 code on ITS page 3.6.17 should be P18. P18 DOC should be reworded to apply to Insert 17A also.  RBS to provide revised P.18 DOC.	
37. ITS SR 3.6.1.3.9	Change in text to add exceptions for PVLCS and MS-PLCS.	CLB				X	[B1], [P18] This is CLB that is approvable but discussion is requested.	o	R	P18 DOC should be revised. See comment #36.  RBS to provide revised P.18 DOC.	

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			C	G	P	R					
38. ITS New SR- Insert18A	A new SR for combined leakage rate for all annulus bypass leakage.	CLB				X	[P15] This is CLB that is approvable but discussion is requested.	o	R N	New SR 3.6.1.3.11 needed to satisfy CLB.  RBS to provide markup. OTSB to review equivalence of ITA SRs 3.6.1.2.1 & 3.6.1.3.11 presentation for CTS Table 3.6.1.3-1 see #8 3.6.1.2, Airlocks.	
39. ITS 3.6.1.3.10	Text change from "all four" to "each".	P	X				[P17] This is approvable for CPS, however Perry should make same change to be like CTS.	o	P	See PNPP L.2.  PNPP to provide additional safety justification.	
40. ITS New SR 3.6.1.3.10	New SR proposed for excess flow control valves.	P	X				[P13] This change must be evaluated with earlier plant specific change to add EFCVs to Condition A.	a	N		
41. CTS 3.6.4	Deletion of Table 3.6.4-1	R				X	[A12] Relocation to USAR is acceptable	a			V

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OPERATIONAL CONDITIONS ↓	SYSTEMS →	PRIMARY CONTAINMENT ISOLATION VALVES -PCIVs								SECONDARY CONTAINMENT ISOLATION VALVES -SCIVs								DRYWELL ISOLATION VALVES							
		C		GG		P		RB		C		GG		P		RB		C		GG		P		RB	
PLANTS		C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I
CTS - ITS		C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I
MODES 1, 2, and 3 and		X	X	X	X	X	X	X	X											X				X	
• When required by instrumentation			X	X	X		X		X											X					
• When moving irradiated fuel in primary containment and secondary containment and during core alterations and OPDRVs for only the valves with secondary bypass leakage paths		X	X																						
• When moving irradiated fuel in primary containment, during core alterations and OPDRVs						X																			
• Modes 1, 2, 3, and 5 for all valves that isolate the RWCU system suction containment penetration with any control rod withdraw, however not applicable to control rod removed per 3.9.10.1 or 3.9.10.2.		X																							

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OPERATIONAL CONDITIONS ↓	SYSTEMS →	PRIMARY CONTAINMENT ISOLATION VALVES -PCIVs								SECONDARY CONTAINMENT ISOLATION VALVES -SCIVs								DRYWELL ISOLATION VALVES							
		C		GG		P		RB		C		GG		P		RB		C		GG		P		RB	
PLANTS		C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I	C	I
CTS - ITS						X	B																		
<ul style="list-style-type: none"> <li>• Containment vessel and drywell purge system 42" inboard purge valves, M14-F045 and -F085, not required operable during Modes 1,2,3</li> </ul>																									
<ul style="list-style-type: none"> <li>• RCIC System CIVs are not operable when moving irradiated fuel in primary containment, during core alterations and OPDRVs</li> <li>• Fire Protection CIVs IP54-F726 and F727 are not operable when moving irradiated fuel in primary containment, during core alterations and OPDRVs</li> </ul>						X																			
						X	c																		
							o																		
							m																		
							e																		
							n																		
							t																		
							2																		
Modes 4 and 5 except for RHR Shutdown Cooling suction line valves E12-F008 and F009		X																							

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
1. ITS LCO 3.6.1.5	The LCO temperature limit has been increased to match the initial temperature limit assumed in the accident analysis.	L	?	X			[L1] GG requests to exceed the CLB based upon the sentence in the NUREG. There are various assumptions and analysis already based upon this CLB limit. CPS matches its 122°F CLB limit, however the USAR also includes Tables 6.2-13 and 15 where initial temperature is assumed to be 90°F.	o	N	GGNS UFSAR Table 6.2-4 explicitly states 95°F. This change isn't just based on a sentence in the NUREG but is in accordance with the Policy statement which says the TS are to control the assumptions of the analysis.  OTSB to review CPS CLB and evaluate GGNS change. ITS use containment air temp limit = initial condition of Containment response.	
2. ITS LCO 3.6.1.5	The LCO temperature limit has been increased to match a requested change to NRC dated 6-24-92.	L			X		[A1] There is no basis for this change. The letter to the NRC identified as P4-CEI/NRR-1510 has not been accepted yet by the staff.	o	P	This is a previous submittal, PY-CEI/NRR-1510L dated June 24, 1992.  This comment is being held open for NRC OTSB tracking only.	
3. CTS 4.6.1.7/8	The methods for performing this SR have been relocated to the BASES and procedures.	R	X	X	X	X	[LA1] This is an acceptable relocation which is in conformance with the NUREG. Verify now.	a			V

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
1. ITS 3.6.1.7 CTS 3.6.3.2	River Bend does not have an RHR Containment Spray System but instead has proposed TS on Primary Containment Unit Cooler in accordance with CTS 3.6.3.2.	CLB A	-	-	-	X	[P3] Any ITS/CTS items requiring discussion are included on Table for LCO 3.6.1.7A.	a			
2. CTS 3.6.3.2 LCO Statement	The relocation to the BASES of the identification of the separate system design components required to be OPERABLE.	CLB R	X	X	X	-	[LA1] It is acceptable to relocate to BASES, however there are terminology changes from CLB and plant-to-plant differences which should be discussed in BASES.	a	N		
3. CTS 3.6.3.2 Action a	The AOT of 72 hours is relaxed to 7 days for one containment spray loop inoperable.	L	X	X	X	-	[L1] This is approvable as being consistent with NUREG-1434; however, aside from similarity to CTs for ECCS subsystems what justifies increase to 7 days.	a	N		
4. ITS SR 3.6.1.7.1 Note	The note added permitting RHR containment spray to remain OPERABLE with automatic actuation defeated while realigned to RHR-SDC mode of operation.	L	X	X	X	-	[L2] The addition of this note is acceptable; however, some discussion required on terminology and further justification of what "not otherwise inoperable" means.	a	N		

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
5. ITS SR 3.6.1.7.2	It is proposed that pump flow in TS be the accident analyzed flow rather than the actual ECCS pump flow thru containment spray loop.	L	X	X	X	-	[L3] This will be atypical to specified flows in ITS which are based upon pump performance. Isn't flow based upon installed pipe orifices to balance or achieve a minimum flow while in RHR containment spray mode? Why does GG flow stay the same?	o r 1	N	OTSB to review L.3.  May 13, 1994-Since this is the same pump as the ECCS function, this justification is inadequate. Refer to CTS Section 3.5, page 7 which proposes a 7450 gpm flow rate at 125 psid for LPCI.	
6. ITS SR 3.6.1.7.3	The details of how this SR is performed are relocated to BASES and procedures.	C L B R	X	X	X	-	[LA2] This is acceptable under the reformat changes of the NUREG.	a			V

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
7. ITS SR 3.6.1.7.4	It is proposed this SR be deleted because it is deemed a post-maintenance test only.	C L B L	-	X	-	-	ITS-[P4], CTS-[LA3] This justification in ITS does not explain contents of SSER #6 which is not available and GG appears not to be any different from Perry or CPS.	a	G	SER Supplement 6. Chapter 16 states "The addition of the requirement to perform an air or smoke flow test to Surveillance Requirement 4.6.3.2 and the revision to Bases 3/4.6.3 constitutes an additional requirement not presently included in the Technical Specifications. The licensee contends that the design of the containment spray system is such that nozzle obstruction should not occur unless caused by maintain activities; therefore, the surveillance frequency should not be time dependent but instead should be coordinated with the completion of applicable maintenance activities. The containment spray nozzles were initially air-tested during the preoperational test phase and no maintenance has been performed on the system since that time that could cause nozzle blockage. Based on the above discussion, the staff finds the proposed Technical Specification changes to be acceptable and necessary."	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
1. ITS 3.6.1.8 All	This LCO is not used.	P	X				[P4] Why is this not applicable? USAR 6.2.6.5.4 only refers to MSIV-LCS but are there any other positive air pressure or water pressurizing leakage control systems? What about in USAR 6.2.6.2.b.2.d, where electrical penetrations have a leakage surveillance system?	a	C	The CPS design does not include a feedwater leakage control system nor does it include a penetration valve leakage control system.	
2. CTS 3.6.1.10	CLB refers to "Divisions" OPERABLE rather than "Subsystems".	P				X	[LA1] What is appropriate terminology? The BASES don't agree. In SR 3.6.1.9.3, what is the unapparent difference? Also, explain with regards to terminology used in SR 3.6.1.3.7.	o	R	Both terms are correct.  RBS to make terminology consistent.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
3. CTS 3.6.1.5/9/ 10 Action	The CLB requires a LCO 3.0.3 shutdown when two subsystems are inoperable. New Condition B is a relaxation in the NUREG that permits this degraded condition 7 days before shutdown.	L	-	X	X	X	[L1] This change can be approved provided this justification (which is needed for SER) explicitly qualifies the three factors used in the engineering judgment applied. The references are not available and item 2 is not addressed. What is the incremental (or percent) increase in the core damage frequency with two subsystems inoperable for 7 days? For RB, are these references the same for PVLCS?	o	N	The proposed change in the allowed out of service time does not increase the core damage frequency.  OTSB to review L.1.	
4. CTS 3.6.1.10	The CLB permits one subsystem inoperable for only 7 days rather than NUREG Condition A which permits 30 days.	C L B L				X	[L1] This is same justification for item 3 above, however this CLB relaxation is not discussed. Why should this change be made? Why is RBS different from other plants?	o	N	OTSB to review L.1.	
5. CTS 4.6.1.5.b	The IST requirements are not specified in ITS but are relocated to Section 5.0.	C L B R	-	X	X	X	[LA2] for GG, Perry and [LA3] for RBS This is approvable per the NUREG format change but what exists to verify this CLB requirement will be fulfilled.	a	N	This will be provided on the LA matrix from each plant.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
6. ITS SR 3.6.1.8.2	This SR is deleted which requires a system functional test every 18 months.	P		X	X		[P5] Why not leave as is? River Bend has the same manual system and has kept this SR.	a	G	River Bend uses a positive pressure air system.	
7. CTS 4.6.1.10. c	The details of how to perform the SR are relocated to procedures.	C L B R				X	[LA2] This is acceptable under the reformat changes of the NUREG.	a			V
8. CTS 4.6.1.10. d	The relocation of OPERABILITY tests for PVLCS control system instrumentation channels.	C L B R				X	[LA4], [L2] Acceptance of these changes are pending the chapter reviewer's approval of the technical justification.	o	N	OTSB to review L.2.	
9. CTS 3.6.1.9 Action	The second "or" is changed to "and".	C L B A ? P ?			X		[A1] The justification referenced letter is not available. Is there a plant specific reason for difference? Is this an error or oversight in CTS?	o	P	This is a previous submittal, PY-CEI/NRR-1459L dated March 19, 1992.  This comment is being held open for NRC OTSB tracking only.	

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## CTS to ITS LCO Evaluation

4/15/94

ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
1. ITS 3.6.2.1	The temperature limits of the suppression pool are proposed to be changed without any technical justification that is available for review.	L			X		[A2] This change can not be approved because the basis for the justification is not available and apparently not accepted yet by the NRC staff. Use the CLB limits.	o	N	This is a previous submittal, PY-CEI/NRR-1510L dated June 24, 1992.  This comment is being held open for NRC OTSB tracking only.	
2. CTS 3.6.3.1 Action b,b.1,& b.2.a	There is a difference in Actions between the CTS and the ITS if the temperature is not returned to < limit in 24 hours. CTS requires to be in HOT SHUTDOWN in 12 hours and in COLD SHUTDOWN in the following 24 hours. ITS just reduces to $\leq$ 1% RTP in 12 hours.	L	X	X	X	X	This less restrictive change is not specifically justified. Shouldn't Condition C become Condition B and then Condition B (modified as Condition C) to include Condition A and B not met. Otherwise suppression pool can be greater than limit for 36 hours before power is reduced. Review with the next item.	a	C	The SP limit when <1 % RTP is 110 degrees. When power is reduced to 1%, the limit becomes 110, not 95. If greater than 110, Cond A does not apply.	
3. ITS Condition C	There is no action or condition if Condition C is not met.	L	X	X	X	X	This change is not identified in ITS. The ITS expects Condition A to be automatically entered after required action but what if recovery from testing can not be performed immediately, shouldn't the power level be reduced.	a	G	We did not feel that Condition C could fail to be met other than by deliberate non compliance.	

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## CTS to ITS LCO Evaluation

4/15/94

ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
4. CTS 3.6.3.1 Action b.2.b	The CTS actions to place an RHR loop in suppression pool cooling mode are deleted.	CLBR	X	X	X	X	[L2] This is approvable provided questions on justification are answered. Such as explain what circumstances make the RHR unavailable and what other systems are available to remove decay heat? Why does justification seem to permit situation to reach the 10CRF50.54(x) stage? Why do the BASES not state what are the appropriate procedures to remove heat from the reactor without additional heat being added to the suppression pool?	a	N		
5. ITS Condition D	New required Action D.3 to place the plant in MODE 4 for which the LCO is not applicable.	CLBA	X	X	X	X	[C1] This is a generic change approved as item C7 of change package BWR-04. Why didn't plants incorporate the editorial change?	a	N	Acceptable as-is.	

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ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	SCAT
			C	G	P	R					
6. CTS 4.6.3.1.b. 2	The CLB has an SR to verify THERMAL POWER $\leq$ 1% RTP after suppression pool has exceeded limit for more than 24 hours.	CLBL	X	X	X	X	[L3] This would be the same as a "new" Required Action B.2 to verify $\leq$ 1% RTP once every hour while greater than limit. Is this not already done? Shouldn't Condition D also include the condition of Condition B not met to assure MODE 4 is entered if Required Action B.1 is not sufficient?	a	C	Required Action B.1 directs the plant to be less than 1% RTP in 12 hours which will result in exiting Conditions A and B. There should not be a RA to verify you have not re-entered Cond B. Once the plant was below 1 % RTP, then B.1 would be met without a further need to go to MODE 4.	
7. CTS 4.6.3.1.b and 4.6.3.1.c	The text limiting the temperature verification to Operational Conditions 1 and 2; and for RBS only, for Operational Condition 3 have been deleted.	M	X	?	X	X	[M2] This deletion is acceptable as noted for Perry; however, why doesn't other plants show this as more restrictive change? Should BASES be revised?	a	C	Yes this should be shown as an "M" for the other plants. However, generic NSHC has been provided for "M" changes.	
8. CTS 4.6.3.1.b. 3	The phrase "following a scram" has been deleted.	M?	X	X	X	X	This deletion has not been categorized or justified but the CTS markup indicates it is "same" as Required Action D.1. Please explain. Shouldn't BASES be revised?	a	C	When the plant scrams, it is automatically in MODE 3. This is considered to be a level of markup detail issue.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
9. CTS 3.4.2.1 Action b	With S/R valve(s) stuck open and suppression pool temperature > 105°F, place the reactor mode switch in the shutdown position.	CLBL				X	This is a placeholder from the Chapter 3.4 reviewer for a relaxation to 110°F via Condition D. Review with item #3 above.	a	N	See Section 3.4 comment #33.	

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4/15/94

ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
1. ITS 3.6.2.1	The temperature limits of the suppression pool are proposed to be changed without any technical justification that is available for review.	L			X		[A2] This change can not be approved because the basis for the justification is not available and apparently not accepted yet by the NRC staff. Use the CLB limits.	o	N	This is a previous submittal, PY-CEI/NRR-1510L dated June 24, 1992.  This comment is being held open for NRC OTSB tracking only.	
2. CTS 3.6.3.1 Action b,b.1,& b.2.a	There is a difference in Actions between the CTS and the ITS if the temperature is not returned to < limit in 24 hours. CTS requires to be in HOT SHUTDOWN in 12 hours and in COLD SHUTDOWN in the following 24 hours. ITS just reduces to $\leq$ 1% RTP in 12 hours.	L	X	X	X	X	This less restrictive change is not specifically justified. Shouldn't Condition C become Condition B and then Condition B (modified as Condition C) to include Condition A and B not met. Otherwise suppression pool can be greater than limit for 36 hours before power is reduced. Review with the next item.	a	C	The SP limit when <1 % RTP is 110 degrees. When power is reduced to 1%, the limit becomes 110, not 95. If greater than 110, Cond A does not apply.	
3. ITS Condition C	There is no action or condition if Condition C is not met.	L	X	X	X	X	This change is not identified in ITS. The ITS expects Condition A to be automatically entered after required action but what if recovery from testing can not be performed immediately, shouldn't the power level be reduced.	a	G	We did not feel that Condition C could fail to be met other than by deliberate non compliance.	

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4/15/94

ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
4. CTS 3.6.3.1 Action b.2.b	The CTS actions to place an RHR loop in suppression pool cooling mode are deleted.	C L B R	X	X	X	X	[L2] This is approvable provided questions on justification are answered. Such as explain what circumstances make the RHR unavailable and what other systems are available to remove decay heat? Why does justification seem to permit situation to reach the 10CRF50.54(x) stage? Why do the BASES not state what are the appropriate procedures to remove heat from the reactor without additional heat being added to the suppression pool?	a	N		
5. ITS Condition D	New required Action D.3 to place the plant in MODE 4 for which the LCO is not applicable.	C L B A	X	X	X	X	[C1] This is a generic change approved as item C7 of change package BWR-04. Why didn't plants incorporate the editorial change?	a	N	Acceptable as-is.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
6. CTS 4.6.3.1.b. 2	The CLB has an SR to verify THERMAL POWER $\leq$ 1% RTP after suppression pool has exceeded limit for more than 24 hours.	CLB L	X	X	X	X	[L3] This would be the same as a "new" Required Action B.2 to verify $\leq$ 1% RTP once every hour while greater than limit. Is this not already done? Shouldn't Condition D also include the condition of Condition B not met to assure MODE 4 is entered if Required Action B.1 is not sufficient?	a	C	Required Action B.1 directs the plant to be less than 1% RTP in 12 hours which will result in exiting Conditions A and B. There should not be a RA to verify you have not re-entered Cond B. Once the plant was below 1 % RTP, then B.1 would be met without a further need to go to MODE 4.	
7. CTS 4.6.3.1.b and 4.6.3.1.c	The text limiting the temperature verification to Operational Conditions 1 and 2; and for RBS only, for Operational Condition 3 have been deleted.	M	X	?	X	X	[M2] This deletion is acceptable as noted for Perry; however, why doesn't other plants show this as more restrictive change? Should BASES be revised?	a	C	Yes this should be shown as an "M" for the other plants. However, generic NSHC has been provided for "M" changes.	
8. CTS 4.6.3.1.b. 3	The phrase "following a scram" has been deleted.	M ?	X	X	X	X	This deletion has not been categorized or justified but the CTS markup indicates it is "same" as Required Action D.1. Please explain. Shouldn't BASES be revised?	a	C	When the plant scrams, it is automatically in MODE 3. This is considered to be a level of markup detail issue.	

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			C	G	P	R					
9. CTS 3.4.2.1 Action b	With S/R valve(s) stuck open and suppression pool temperature > 105°F, place the reactor mode switch in the shutdown position.	CLBL				X	This is a placeholder from the Chapter 3.4 reviewer for a relaxation to 110°F via Condition D. Review with item #3 above.	a	N	See Section 3.4 comment #33.	

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ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	STATUS
			C	G	P	R					
1. CTS 3.6.3.3 LCO Statement	This is the relocation to the BASES of the identification of the separate system design components required OPERABLE.	CLBR	X	X ?	X	X ?	[LA1], [P3] It is acceptable to relocate details to the BASES; however, the BASES do not agree on GG and RBS for the number of heat exchangers. Is this an error in the CTS?	o	G	These differences are due to the differences in the design between the two plants.  GGNS to provide Bases changes.	
2. ITS Condition A	Condition A is a relaxation from 72 hours to 7 days with one suppression cooling loop inoperable.	L	X	X ?	X	X	[L1] This change is approvable as being consistent with the NUREG; however, the NUREG did not intend relaxation to be coincident with both loops inoperable. This justification needs review.	a	N		

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## CTS to ITS LCO Evaluation

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
3. ITS Condition B	Condition B is divided into two conditions with the creation of a new LCO for two RHR suppression subsystems inoperable.	CLB	-	X	-	-	[P2] Grand Gulf's AOT of 8 hours with both subsystems inoperable is unique to the old STS and previously licensed plants. This loss of function was specifically excluded from the NUREG after extensive discussion with the staff. NUREG specifically prescribes a unit shutdown written into the LCO. Please supply a copy of the Safety Evaluation to the license amendment which approved this action. Why won't GG accept the more restrictive NUREG? Why is this not a possible error in the CTS?	a	G	This is not a mistake. This 8 hour AOT was part of Tech Spec Problem Sheet 169. The close out of this TSPS was discussed in SER 6 and the CS and Supp. Pool Cooling Actions were deemed OK. The specific 8 hours was not discussed in the SER. This is CLB.	
4. CTS 3.6.3.3 Footnote (*)	This is the deletion of the footnote regarding alternate heat removal methods when both subsystems are inoperable.	CLB	X	X	X	X	[A1] The deletion of this footnote is acceptable as consistent with the NUREG; however, contrary to the justification the BASES should fully describe the intent of the footnote.	a	N		

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			C	G	P	R					
1. CTS 3.6.7.1	The hydrogen recombiner is located outside primary containment.	P			X		It is not clear whether recombiner is temporary or permanently installed.	a	P	Hydrogen Recombiners are permanently installed at PNPP. Bases discussion adequately describes installation.	
2. CTS 4.6.6/7.b. 1	Relocation of CTS requirements out of ITS to plant procedures.	CLBR	X	X	X	X	[LC1] This is a placeholder awaiting the Chapter 3.3 reviewer's approval.	a	N		
3. CTS 4.6.6/7.b 2, 3 and 4	The details of performing these SRs are relocated to the BASES and plant procedures.	CLBR	X	X	X	X	[LA2] This is acceptable under the reformat changes of the NUREG.	a			V
4. CTS 4.6.7.1.c	The ILRT test and CIV leak tests of CTS moved to ITS LCO 3.6.1.1 and 3.6.1.3.	P	X				This is a placeholder to verify that the CTS requirement is consistent with changes made to the ITS.	a	N	See SR 3.6.1.1.2.	
- BASES -											
5. ITS Condition B	What are the identities of the alternate hydrogen control capabilities?	P	X	X	-	X	[B1], [L2]-CTS Why not list all alternates like PNPP? Also see item B.	a	P	Combustible gas mixing system discussion deleted from PNPP. Igniters do not require mixing system to operate.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
6. ITS Condition B	The Completion Time of "Once every 12 hours ..." is not justified.	A	X	X	X	X	[C1] This is a generic change - Traveler Required. Why has the BASES not been revised due to the proposed change? Also the NUREG-1434 BASES appear deficient when compared to NUREG-1431, LCO 3.6.9.	o	C G P R	A similar Frequency was proposed by the Staff for addition to the ECCS ACTIONS. This reverification frequency was determined to be unnecessary. The BWR6s will revise to remove this frequency.  Plants to delete "AND once per ..." for LCOs 3.6.3.1, 3.6.3.2, 3.6.3.3.	
7. ITS SR 3.6.3.1.1	The temperature of the heater sheath and reaction chambers are all different from the respective CTS.	P	X	X	X	X	[B1] BASES, second paragraph Background and SR 3.6.3.1.1. The requirements of 4.6.6/7.a and b need co-review with proposed BASES.	o	C	RBS, GGNS, and PNPP do not have reaction chambers, all other temperatures in ITS are the same as CTS.  CPS to revise B 3.6-77 to replace "it" in two locations.	

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			C	G	P	R					
1. CTS 3.6.6/7.2/ 3	The details relating to the system design and identification of components are relocated to the BASES.	C L B R	X	X	X	X	[LA1] This is acceptable to relocate to the BASES based upon the reformat changes to the NUREG. A general discussion is required to clarify each plants' system differences.	a	N		
2. CTS 3.6.6.2 Footnote (*)	There is (was) an ammonia purge inside PC which is proposed to be deleted.	C L B				X	[A1] This is probably acceptable; however, please discuss more pertaining to ammonia purge in PC which does not appear to be self limiting.	a	R	Problems associated with ammonia no longer exist since all insulation has cured.	
3. CTS 3.6.6.2	The CTS requirement for hydrogen mixing valves being closed and time limits for being open are relocated.	C L B R				X	[L4] This change justification is not provided. This is a placeholder until a re-review of these CTS requirements being located in ITS LCO 3.6.5.3 can be completed.	o	R	RBS to provide L.4 DOC and NSHC.	
4. ITS 3.6.3.3 Applicability	This CTS LCO 3.6.6.2 was applicable in Operational Conditions 1, 2 & 3. ITS applicability is only MODES 1 & 2.	C L B L				X	There is no change justification for this relaxation. Please provide.	a	R	The MODE 3 applicability was for opening time limits which are covered by ITS LCO 3.6.5.3.  L.2 addresses elimination of LCO 3.0.3 for 2 subsystems inop.	

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			C	G	P	R					
5. ITS 3.6.3.3 Condition A	The ITS has stated that LCO 3.0.4 is not applicable.	L	X	X	X	X	[L1] It is acceptable based upon the NUREG; however, the text justification supporting this change needs discussion.	a	N		
6. CTS 4.6.6.2.b. 1 4.6.7.2.a. 1 4.6.7.3.a. 1 and b.1	The details of these SRs are relocated to the BASES or procedures.	C L B R	X	X	X	X	[LA2] It is acceptable to relocate these details per the reformat changes of the NUREG.	a			V
7. CTS 4.6.7.3.c	The CTS requirements for instrumentation channel OPERABILITY are relocated.	C L B R		X			[LA3], [L3] This is pending the Chapter 3.3 reviewer's approval.	o	G	GGNS to provide revised SRs for NRC to review.	
8. CTS 4.6.7.3.b. 2	Is this CTS requirement deleted or is it part of new SR 3.6.3.3.3?	L		X			[LA3] The new SR is acceptable; however, where is this CTS requirement located? LA3 does not justify these changes. Please provide. Also why is there not a system functional test for other plants?	o	G	These requirements are part of SR 3.6.3.3.3.  GGNS to provide revised SRs for NRC to review.	

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ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	SCAT
			C	G	P	R					
1. CTS ??	There appears to be no CTS LCO for SCIVs or dampers. There is also no applicability for SC operability during fuel movement.	P			X		[B1] Explain what current requirements for verifying operability of SCIVs exist today and where in the CTS or elsewhere these requirements are located.	a	P	Only requirements in CTS appear in LCO 3/4.6.6.1 under Secondary Containment OPERABILITY.	
2. ITS/CTS Name changes	It is requested that SC isolation "valves" be changed to "dampers" or SCIDs. It is also proposed other devices be used to achieve isolation.	AM	X	X	?	X	[P2], [P3], CTS-[LA1] for GG and justification Plant specific name changes are acceptable; however, LCO and BASES must agree. Problems - CPS BASES still refer to automatic isolation valves. GG mentions no dampers in LCO. RBS uses [P2] rather than [P3], why? Are manual valves and blind flanges now SCIVs or is this limited to automatic valves? Are there automatic dampers? Manual dampers? What are the other SC isolation devices <u>now</u> only defined in FSARs?	a	N		

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			C	G	P	R					
3. ITS 3.6.4.2 Applicability	Change to NUREG Applicability and changes to Condition D consequentially.	P				X	[B1], [P2] and CTS [A1] Justification insufficient. Change appears to delete SC isolation operability during fuel movement, core alterations, and OPDRVs. This contradicts BASES and perhaps new LCO is required for just fuel building.	a	R	See response to LCO 3.6.1.1 comment 1.	
4. CTS 3.6.6.2 Applicability	This change to CLB adds handling of fuel in PC to this LCO applicability.	T	X				[M3] Does this addition of new applicability require a change to the current secondary containment design analysis for FHA in PC?	a	C	Since SC completely surrounds PC, this is considered to be the same thing.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	P	R					
5. ITS Conditions A & B	Deletions of specific mechanisms which isolate flowpaths.	L	X	X X	X	X	[C2], [C3] This is a generic change - Traveler required. [P2] The use of rupture disks should not be allowed. This is especially important if there is no verification of isolation status in lieu of administrative means. Disk rupture can go undetected.	o	N	Generic Change BWR-15, C.1. This comment is being held open for NRC OTSB tracking only.	
								o	G	The Bases for Conditions A and B do not allow the use of a rupture disc to isolate the flow path. But, as identified in the CTS definition of Secondary Containment Integrity a rupture disc is an acceptable secondary containment isolation device, as a result it was included in the definition of an SCIV.  Insert B97A need to change "SCID" to "SCIV". GGNS to submit ITS markup.	
6. CTS 3.6.4 Action a	This CTS CIV AOT is 4 hours which has been referenced in the justification for increasing CT from 4 to 8 hours.	C L B ?	?	?	X	?	[L7] This justification is not understood. Does this relate to item #1 above? Are SCIVs covered now in CTS 3.6.4? How does other plants relate as implied in justification?	o	P	The L7 DOC will be relocated/renumbered into ACTION a for LCO 3/4.6.6.1 DOC. The NSHC does not need to be revised because of this relocation.  PNPP to revise CTS pages 3/4 6-45 and 3/4 6-28 markups.	

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ITEM # CHANGE	DESCRIPTION	T Y P E	GENERIC				EVALUATION/RESOLUTION	C O D E	L E A D	DISCUSSION	S C A T
			C	G	O	R					
7. ITS Condition D	The deletion of LCO 3.0.3 note in Perry.	P			X		[P4] Is this related to item #1 above and it may be dependent upon its resolution?	a	P	Due to plant design, PNPP can not move fuel inside their secondary containment. Movement of fuel inside primary containment can only occur with the plant shutdown in MODE 4 or 5. LCO 3.0.3 already has a statement that LCO 3.0.3 is only applicable in MODES 1, 2, and 3. Therefore, by plant design and the language of LCO 3.0.3, the NOTE to Required Action F.1 is not required.	
8. ITS Condition D	The text changes to Condition D for RBS.	P				X	[P2] Is this related to item #3 above and it may be dependent upon its resolution?	a	R	See response to LCO 3.6.1.1 comment 1.	
9. CTS 3.6.6.2 Action	This action for operational condition (*) could result in an LER if not clarified.	C L B	X	X			[A3] Please discuss more. Why is the clarification only noted here when similar wording has appeared elsewhere? Why are not all plants affected? Shouldn't CTS LCO 3.6.6.1 also be identified?	a	N		
10. ITS SR 3.6.4.2.2/ 3	Deletion of NUREG SRs.	P			X		[P7] Is this related to item #1 above and it may be dependent upon its resolution?	a	P	There are no automatic Secondary Containment isolation valves in PNPP design.	

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			C	G	P	R					
11. CTS 3.6.5.3 3.6.6.2	An allowance to open SC penetration flowpaths under administrative controls proposed.	L	X	X	?	X	[L1] Addition of note #1 is acceptable but justification needs rewrite. Why shouldn't Note #2 of SR 3.4.2.1 be deleted?	a	C	The Actions Note 1 is provided to reopen inoperable valves. The Note 2 to SR 3.4.2.1 is provided to allow manual valves open under admin control to be considered Operable, thus not resulting entry into the Action.	
12. CTS 4.6.5.1 4.6.6.1	Surveillance of all manual valves, blind flanges, and de-activated dampers/valves.	C L B	X	X	?	X	[M1], [M2] This CLB requirement in CTS is carried forward to SR 3.6.4.2.1. This is not more restrictive, but equivalent. Delete M1, M2.	a	N		

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			C	G	P	R					
1. ITS 3.6.5.5 LCO	The BASES are required to define the independence, redundancy and identification of the design components comprising a subsystem.	A				X	The BASES need to be reviewed to establish what components are part of an independent OPERABLE subsystem.	a	N		
2. CTS 4.6.4.4 a, b.1.a, b.3	The details of how these SR's are performed are relocated to the BASES and plant procedures.	C L B R				X	[LA1] This is acceptable based upon the reformat changes of the NUREG	a			V
3. CTS 4.6.4.4.b. 3	The verification that the system starts and the isolation dampers open. ITS 3.6.4.4.1	C L B R				X	[LA1] For consistency, SGTS proposes this is part of the system functional test of the SR rather than be relocated.	a	R		
4. New SRs required?	The BASES LCO states one subsystem is required to maintain the annulus at a negative pressure to the environment.	T				X	Shouldn't there be an SR to verify every 18 months the subsystem can draw down the annulus to a negative pressure limit.	a	R	Annulus does not maintain a negative pressure, SGTS does this.	
5. New SRs required?	The BASES do not explain the design in sufficient detail to know what the SR's verify.	T				X	Does this LCO need an SR for manual start of any components?	a	R	This info relocated per LA1.	

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			C	G	P	R					
1. CTS 3.6.5.6 and ITS 3.6.4.6	The BASES are to define the independence of the subsystem.	A				X	[no justification] Please add statement to show the independence of the subsystem.	a	R	Wording is consistent with similar SR for SGTS.	
2. CTS 4.6.5.6 b and e.1	The details of how these SRs are performed are relocated to the BASES and plant procedures.	C L B R				X	[LA1] This is acceptable based upon the reformat changes of the NUREG.	a			V
3. ITS SR 3.6.4.6.4 CTS 4.6.5.6.e. 4	The CTS verifies manual opening of dampers and the fan can be manually started.	A ? L ?				X	[no justification] The ITS requirement does not differentiate between a manual or automatic opening/start of these components. This is similar to item in LCO 3.6.4.3.	a	N		
4. CTS 4.6.5.6 c, d, e.2,e.3, f and g	These CTS SRs are being relocated to ITS LCO 3.3.6.2 and 5.7.13.	C L B R				X	[A1] These items are pending the review of Chapter 3.3 and 5.0 Reviewers' approvals.	o	N	This comment is being held open for NRC OTSB tracking only.	

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			C	G	P	R					
1. CTS 3.6.2.1 Actions	The creation of a new LCO 3.6.5.3 is considered both "more" and "less" restrictive.	L ? M ?	X	?	X	?	[L2], [M1] Why is this new LCO more restrictive? Why is it not true for all plants?	a	C	Under the CTS requirements for CPS and PNPP, the drywell isolation valves are not specifically identified, they are considered part of drywell integrity. Drywell integrity can be satisfied by the operability of only one valve (i.e., no action with 1 inop). With the one required valve inop, it would be required to be restored (or isolated) in 1 hour per drywell integrity. LCC 3.6.5.3 allows 4 hours to isolate (L). Also, new SRs for the drywell valves (M).	
2. ITS SR 3.6.5.1.1 SR 3.6.1.1.3	The drywell bypass leakage shall be less than "or equal" to the limit .	C L B	X	X	X	-  X	[C1] This is approvable. Generic change - Traveler required.	a	G	Consistent with CTS.	
3. ITS SR 3.6.5.1.3	Deletion of the second "bypass" word in SR text.	L				X	[B1] This deletion is not specifically justified and contradicts attempts to be consistent.	a	R	This is a copy smudge. Second bypass is not being deleted.	

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			C	G	P	R					
4. ITS New SR 3.6.5.1.1/ 2	Addition of new SRs for personnel door per CTS.	CLB				X	[P2] This personnel door is not discussed in the BASES. It is assumed not to be the drywell airlock. Should these SRs be here or in LCO 3.6.5.3?	o	R	See CTS SR 4.6.2.1.e, and ITS INSERT page B 3.6-110.  RBS to submit revised Bases.	
5. CTS 3.6.2.2 4.6.2.2	The drywell bypass leakage acceptable design value and the details of how tests are performed are relocated to the BASES and procedures.	CLBR	X	X	X	X	[LA1], [LA2], [L1] This change can be approved when the BASES are upgraded to explain why and to comply with the justifications. Why doesn't Frequency have a note for two consecutive test failures reverting to 9 month interval? What if RB personnel door is "ajar"?	a	N		

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CTS to ITS LCO Evaluation

ITEM # CHANGE	DESCRIPTION	TYPE	GENERIC				EVALUATION/RESOLUTION	CODE	LEAD	DISCUSSION	SCAT
			C	G	P	R					
1. ITS LCO Statement	Exempts drywell vacuum relief system valves.	AM	X	X	X		[C1] This is a generic change - Traveler Required. Justification for exemption is that these are dual function valves but so are others (ie. ECCS) which have functional capability and isolation capability. This LCO covers the isolation capability and Note 3 assures operators are alerted to the functional capability which is covered in LCO 3.6.5.6	o	C	See BWR-15, C.6.  This comment is being held open for NRC OTSB tracking only.	
2. ITS LCO Operability	CPS has provided an unique LCO operability statement which reformats Conditions A & B.	P	X				[P10] Is this a design difference? Is it in the CTS?	a	C	The CTS for CPS does not specifically identify the drywell isolation valves, they are considered part of drywell integrity. Drywell integrity is maintained by the operability of one isolation valve. Thus, entry into an Action is not required so long as 1 valve in the penetration remains operable. The ITS has been proposed consistent with these CTS requirements.	

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			C	G	P	R					
3. CTS Applicability Actions	GG has CTS Mode 1 and 2 applicability limitation for when DIVs can be open.	CLB		X			This is not in markup. Should this be placed in Applicability, Actions or Notes in SRs rather than omitted? Also could add to Condition B.	a	N		
4. ITS Actions Note #1	Certain DIV purge valves are sealed closed and not to be opened.	CLB	X	?	X	X	[P11] This is approved when plant terminology is verified. There should be a traveler for this change.	a	C	This change did not satisfy the threshold for a generic traveler since this is a BWR-6 issue only.	
5. ITS New Note #4	New note added to enter LCO 3.6.5.1 when drywell bypass leakage rate exceeded.	AM	X	X	X	X	[C2] This is a generic change - Traveler Required. New note adds consistency between LCOs but it doesn't replace restrictions placed on CTs for Condition A & B. Changes needed for justification. Also a better place would be a new condition for excessive leakage. Also is the BASES for LCO 3.6.5.1 adequate to accept this new leakage rate?	o	N	BWR-16, C.16.  This comment is being held open for NRC OTSB tracking only.	

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CTS to ITS LCO Evaluation

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			C	G	P	R					
6. ITS Condition A and B	The length of the CTs have been changed to delete the dependency upon the size of the inoperable DIV.	L	X	X	X	X	[C2] This is a generic change - Traveler Required. For all plants, the CLB is 4 hours CT regardless of size and number inoperable per penetration. OG wanted relaxation for small size now Applicants want relaxation to 8 hours for all sizes.	o	N	See BWR-16, C.18.  This comment is being held open for NRC OTSB tracking only.	
7. ITS Condition A & B	a. The Condition B note is deleted or changed. b. Also it is not clear whether or not open purge valves are covered as in CTS 3.6.2.7/8 Actions.	L  C L B	X	X	X	X	[C7], [P10] a. Discuss and define which penetrations are covered by this condition. b. This is an apparent relaxation for which there is no justification.	a	N		
8. ITS Condition A & B	Required Actions A.1, A.2, & B.1 - Text changed in how flowpaths are isolated.	L	X	X	X	X	[C5], [C6] This is a generic change - Traveler Required. "Isolation barriers" can be used instead of "isolation devices", except isolation barrier cannot mean "a check valve with flow thru the valve secured". All references to devices shall be changes to barriers. This eliminates confusion with active and passive devices.	o  r	N  C G P R	BWR-15, C.1 and C.5.  C.6 is still under generic review. This comment is being held open for NRC OTSB tracking only.  C.5 has been generically rejected. Owners to evaluate NRC rejection.	

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			C	G	P	R					
9. CTS LCO 3.6.2.7	Deletion of time limitation for opening certain size drywell vent and purge valves.	CLBR	X	X			[L1] This CLB requirement is being replaced with "specific criteria" which is not defined nor stated where it is to be located.	o	N	OTSB to review SR Note. Also see LCO 3.6.1.3 comment #6.	
10. CTS LCO 3.6.2.7	Drywell vent and purge valves in MODES 1 & 2 cannot be opened when Containment purge valves are open and must be open in MODE 3 for Containment Cooling system.	CLB	X	X		?	[A1] Pertains to SR 3.6.5.3.2 - Justification for treating valve as inoperable is unclear. What if text is moved to Note 1 Applicability and a new condition created to correspond to CTS?	a	C	This requirement has been included in SR 3.6.5.3.2 Note. The effect of this is to require the drywell valves to be closed when the containment valves are open. If the drywell valve is open in this configuration, the SR would be failed. Per SR 3.0.1, entry into the Action would be required.	
11. CTS 4.6.1.8.7	Verify 2" H <sub>2</sub> valves are closed within 4 hours following each purge.	CLB			X		[L3] This relaxation needs clarification.	a	N		
12. ITS SR 3.6.5.3.1/ 2 Notes	a. Differences in "special testing" text b. Deletion of concurrent opening of DIVs c. Addition of which valves open and when	L	X X X	X - X	X X -	? X -	[C12] This is a generic change - Traveler Required. There is no consistency between SR changes and BASES for all plants. Review with LCO 3.6.1.3.	o	N  C  P	OTSB to review C.12 and Notes.  CPS to revise SR 3.6.5.3 Note to identify the 12 and 36 inch containment purge valves in the Notes and Bases.  PNPP to revise ITS SR Notes.	

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			C	G	P	R					
13. ITS SR 3.6.5.3.3 New Note	A new note for verification by administrative "means".	L	X	X	X	X	[C8] This is a generic change - Traveler Required.	a	C	This change did not satisfy the threshold for a generic traveler.	
14. ITS SR 3.6.5.3.6	Deletion of SR for valves blocked open. Refer to CTS 4.6.1.8.6	C L B			X		[B1] This is acceptable with explanation of which valves in these drywell and containment penetrations are blocked open.	a	P	As shown in the markup of CTS LCO 3.6.1.8 item b. the only 42 inch valves with an opening restriction of 50 degrees are the 1M14-F040 and F090 valves. Also as shown by the markup, these valves will be covered by SR 3.6.1.3.11. This is also consistent with the markup of the present CTS surveillance requirement 4.6.1.8.6.	
15. CTS LCO 3.6.2.1	Notes on verification of penetration isolation by administrative means and in high radiation areas.	L	X	X	X	X	[L1], [L3] This is a place holder for general discussion on similar notes for LCO 3.6.1.3.	a	N		

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			C	G	P	R					
16. CTS 4.6.2.1 Action a (**)	This SR requires verification every 31 days except for penetrations inside the drywell or containment where it is 92 days.	CLB	X	X	X	X	[A4] Are all DIVs located inside PC or Drywell for all plants? If so, why doesn't the SR 3.6.5.3.1, Frequency be 92 days rather than 31 days?	a	G	DIVs are valves between the drywell and primary containment. PCIVs are valves between the drwell or primary containment and secondary containment or the outside world (eg, MSIVs). With this definition in mind all DIVs are in the drywell or primary containment. The 31 day SR Frequency for SR 3.6.5.3.1 and .2 were accepted by the utilities to conform with the NUREG. We are more than willing to make it 92 days.	

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			C	G	P	R					
1. CTS 4.6.2.6	The methods for performing this SR are relocated to BASES and procedures.	R	X	X	X	X	[LA1] This an acceptable relocation which is in conformance with NUREG. Verify now.	a			V
2. ITS 3.6.5.5	The specific temperature limit has been increased from 135°F to 150°F.	C L B	X				[B1] This is no specific justification for this change. The USAR data presented in Tables 6.2-12 and 13 still show initial drywell temperature condition of 135°F.	o	C	CPS is still evaluating this comment.	

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			C	G	P	R					
1. CTS 3.6.1.4 Action d and 4.6.1.3.d. 1	Relocation of the TS requirements for primary containment air lock inflatable seal pressure instrumentation channel.	C L B R		X		X	[LC1] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			
2. CTS 4.4.2.2.b	Relocation of the TS requirements for the low-low set function of the relief valve instrumentation channels to LCO 3.3.6.5.	C L B R	X	X	X	X	[No justification] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			
3. CTS 4.6.1.10. d	Relocation and relaxation of the TS requirements for the PVCLS control system instrumentation channels.	C L B R				X	[LA4], [L2] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			
4. CTS 4.6.1.4.d/ e	Relocation and relaxation of the TS requirements for MSIV-LCS and MS-PLCS control system instrumentation channels.	C L B R	X	X	X	X	[A1]-GG and [LA4], [L2] for others Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			
5. CTS 3.6.2.3 Action c and 4.6.2.3.d	Relocation of the TS requirements for drywell air lock door inflatable seal system pressure instrumentation channels	C L B R		X		X	[LC1] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			

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			C	G	P	R					
6. CTS 3.6.3.1 Action c & d or 4.6.3.1.c	Relocation of the TS requirements for the suppression pool level indicator instrumentation.	CLBR	X	X	X	X	[LC1] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			
7. CTS 4.6.3.1.c or Table 4.6.3.1-1	Relocation of the TS requirements for the suppression pool water temperature instrumentation.	CLBR	X	X	X	-	[LC1] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			
8. CTS 4.6.5 b.1.b/b.2. b Action c/e	Relocation of the TS requirements for the position indication of drywell post-LOCA vacuum relief valve.	CLBR	X	X		-	[LC1] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			
9. CTS 4.6.5.b.3	Relocation and relaxation of TS requirements for isolation valve differential pressure actuation instrumentation.	CLBR	-	X		-	[LA2], [L3] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			
10. CTS 4.6.5.1 b.1.b/b.2. b Action d	Relocation of the TS requirements for the position indication of containment vacuum relief breaker.	CLBR			X		[LC1] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			

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			C	G	P	R					
11. CTS 4.6.5.1.b. 3	Relocation and relaxation of TS requirements for vacuum breaker isolation valve differential pressure actuation instrumentation.	CLB R			X		[LA3], [L1] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			
12. CTS 4.6.5.3 b.1.b/b.2. b Action c	Relocation of the TS requirements for the position indication of drywell vacuum breaker.	CLB R			X		[LC1] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			
13. CTS 4.6.5.3.b. 3	Relocation and relaxation of TS requirements for vacuum breaker isolation valve differential pressure actuation instrumentation.	CLB R			X		[LA2] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			
14. CTS 4.6.5.4.d. 1.b	This annulus ventilation exhaust high radiation signal is proposed to be relocated per the justification in CTS 3.3.2.	CLB R				X	[R1] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			
15. CTS 4.6.5.5.b. 1.b	This annulus ventilation exhaust high radiation signal is proposed to be relocated per the justification in CTS 3.3.2.	CLB R				X	[R1] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			

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			C	G	P	R					
16. CTS 4.6.7(6).1	Relocation of TS requirements for control room recombiner instrumentation and control circuits.	CLBR	X	X	X	X	[LC1] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			
17. CTS 4.6.7.3.c	Relocation and relaxation of TS requirements for "drywell purge compressor discharge line vacuum breaker isolation valve differential pressure actuation!!!" instrumentation.	CLBR		X			[LA3], [L3] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			
18. CTS 4.6.5.4.d. 3	These CTS requirements are proposed to be moved to LCO 3.3.6.2.	CLBR		X		X	[A3] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification. Also note that other plants are all different in their treatment of this same SR.	o			
19. CTS 4.6.5.6.e. 3	These CTS requirements are proposed to be moved to LCO 3.3.6.2.	CLBR				X	[A1] Acceptance of these changes are pending the Chapter 3.3 reviewer's approval of the technical justification.	o			

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