PECO ENERGY

10 CFR 50.90

PECO Energy Company
Nuclear Group Headquarters
965 Chesterbrook Boulevard
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May 26, 1995

Docket Nos. 50-277
50-278

License Nos. DPR-44
DPR-56

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Subject: Peach Bottom Atomic Power Station, Units 2 and 3
Supplement 8 to TSCR 93-16
Conversion to Improved Technical Specifications

Reference: (1) Letter from G. A. Hunger, Jr. (PECO Energy) to USNRC dated September 29, 1994

Dear Sir:

In Reference (1), PECO Energy Company submitted Technical Specifications Change Request (TSCR) 93-16, requesting changes to Appendixes A and B of the Facility Operating Licenses for Peach Bottom Atomic Power Station (PBAPS), Units 2 and 3. This TSCR proposed an overall conversion of the current PBAPS Technical Specifications (TS) to the Improved Technical Specifications (ITS), as contained in NUREG 1433, "Standard Technical Specifications, General Electric Plants, BWR/4."

Enclosed is additional information supporting the relocations for Chapter 2.0, Sections 3.1, 3.2, 3.4, 3.5, 3.9, 3.10, and Chapter 5.0. Additionally, enclosed are the differences between the PBAPS, Unit 2 and the Unit 3 ITS for these same chapters and sections.

If you have any questions, please contact us.

Very truly yours,

G. A. Hunger, Jr.

G. A. Hunger, Jr.,
Director - Licensing

TRL/bgr

Affidavit, Enclosure

cc: T. T. Martin, Administrator, Region I, USNRC
W. L. Schmidt, USNRC Senior Resident Inspector, PBAPS
R. R. Janati, Commonwealth of Pennsylvania

020034

A001

COMMONWEALTH OF PENNSYLVANIA :

: ss.

COUNTY OF CHESTER :

W. H. Smith, III, being first duly sworn, deposes and says:

That he is Vice President of PECO Energy Company; the Applicant herein; that he has read the attached response to questions concerning Technical Specifications Change Request (TSCR 93-16, Supplement 8) for changes to the Peach Bottom Facility Operating Licenses DPR-44 and DPR-56, and knows the contents thereof; and that the statements and matters set forth therein are true and correct to the best of his knowledge, information and belief.

W. H. Smith, III

Vice President

Subscribed and sworn to
before me this 24th day
of May 1995.

Notary Public

Notarial Seal
Erica A. Santori, Notary Public
Tredyffrin Twp., Chester County
My Commission Expires July 10, 1995

ENCLOSURE

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

QUESTION:

AI-1 The following clarification is requested in the support of documentation for *RELOCATED* requirements.

In each of the following Discussion of Changes, add a discussion of the reasons why relocation of the subject item(s) is justified.

2.0 R_1, 2.0 R_2

3.1.1 R_1, 3.1.2 R_1, 3.1.3 R_1, 3.1.3 R_2,
3.1.7 R_1, 3.1.7 R_2, 3.1.7 R_3, 3.1.7 R_4,

3.1.8 R_1, 3.1.8 R_2, 3.1.8 R_3

3.2.1 R_1, 3.2.2 R_1

3.4.1 R_1, 3.4.1 R_2, 3.4.1 R_3, 3.4.1 R_4,
3.4.2 R_1, 3.4.2 R_2, 3.4.3 R_1, 3.4.3 R_3,
3.4.3 R_4, 3.4.5 R_1, 3.4.5 R_2, 3.4.6 R_1,
3.4.9 R_1, 3.4.9 R_2, 3.4.9 R_3, 3.4.9 R_4

3.5.1 R_1, 3.5.1 R_2, 3.5.1 R_3, 3.5.1 R_4,
3.5.1 R_5, 3.5.1 R_6, 3.5.2 R_1, 3.5.3 R_1,
3.5.3 R_2, 3.5.3 R_3, 3.5.3 R_4

3.9.1 R_2

5.0 R_4, 5.0 R_6, 5.0 R_{15}, 5.0 R_{16}

RESPONSE

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

AI-1 The following clarifications are provided in support of the relocated items.

CHAPTER 2.0, SAFETY LIMITS

2.0 R_1

The specific details relating to determining when a MCPR Safety Limit has been violated are proposed to be relocated to plant procedures. The requirements of the PBAPS ITS Safety Limit 2.1.1.2 are adequate for assuring compliance with the Safety Limit and for allowing the determination of when a MCPR Safety Limit has been violated so that the actions of Safety Limit Section 2.2, Safety Limit Violations, may be taken. As a result, the specific details relating to when a MCPR Safety Limit has been violated are not necessary for assuring a MCPR Safety Limit violation is identified and appropriate actions taken.

2.0 R_2

The requirement to notify the Nuclear Review Board (NRB) within 24 hours of a Safety Limit Violation and to submit an LER to the NRB is proposed to be relocated to plant procedures. Given that the notification is not required until 24 hours following the Safety Limit Violation and that the LER is an after-the-fact report, the proposed relocated requirement is clearly not necessary to assure operation of the unit in a safe manner. Additionally, in the event of a Safety Limit Violation, Safety Limit Section 2.2.5 does not allow operation of the unit to be resumed until authorization is received from the NRC.

SECTION 3.1, REACTIVITY CONTROL SYSTEMS

3.1.1 R_1

The details related to the method of how to perform the Shutdown Margin verification surveillance (by withdrawing sufficient control rods) are proposed to be relocated to procedures. These details are not necessary to ensure that Shutdown Margin is verified and maintained within limits. The requirements of Specification 3.1.1.1, Shutdown Margin, and SR 3.1.1.1 are adequate to ensure Shutdown Margin is verified and maintained within required limits.

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

SECTION 3.1, REACTIVITY CONTROL SYSTEMS (continued)

3.1.2 R_1

The details of the method of how to perform the Reactivity Anomalies surveillance, comparison based on appropriately corrected past data, and the purpose of the Reactivity Anomalies surveillance have been relocated to the Bases. These details are not necessary to ensure that the limits of the Reactivity Anomalies Specification are not exceeded. The requirements of Specification 3.1.2, Reactivity Anomalies, and SR 3.1.2.1 are adequate to ensure the limits of the Reactivity Anomalies Specification are not exceeded.

3.1.3 R_1

The details of recommended procedures for disarming control rods have been relocated to the Bases. These details are not necessary to ensure inoperable control rods are disarmed. Required Actions A.2 and C.2 of Specification 3.1.3, Control Rod OPERABILITY, which require disarming of inoperable control rods, are adequate for ensuring inoperable control rods are disarmed.

3.1.3 R_2

Requirements to have the control rod drive housing support in place for control rod OPERABILITY are proposed to be relocated to procedures. The CRD Housing Support does support control rod OPERABILITY. Having the CRD Housing Support out of place does impact control rod OPERABILITY. As a result, the requirement for the CRD Housing Support to be in place for the control rods to be considered OPERABLE is adequately addressed in Specification 3.1.3, Control Rod OPERABILITY, and the definition of OPERABILITY. There is no need for duplicate requirements in a subsystem LCO since the definition of OPERABILITY suffices.

3.1.7 R_1

The testing requirement of Current Technical Specification (CTS) 4.4.A.1 for Standby Liquid Control (SLC) System relief valves setting verification is proposed to be relocated to procedures and the Inservice Testing (IST) Program. These testing requirements do demonstrate the SLC System relief valves are OPERABLE. However, the IST Program, required by 10CFR50.55a, provides requirements for the testing of all

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

SECTION 3.1, REACTIVITY CONTROL SYSTEMS

3.1.7 R_1 (continued)

ASME Code Class 1, 2, and 3 valves in accordance with Section XI of the ASME Code. Compliance with 10CFR50.55a, and as a result the IST Program and implementing procedures, is required by the PBAPS Units 2 and 3 Operating Licenses. These controls are adequate to ensure the required testing to demonstrate OPERABILITY is performed.

3.1.7 R_2

The details of the method for performing the surveillance to verify flow through the SLC subsystem into the reactor pressure vessel are proposed to be relocated to the procedures. These details are not necessary to ensure that SLC System is maintained OPERABLE. The requirements of Specification 3.1.7, SLC System, and SR 3.1.7.9 are adequate to ensure the capability to provide flow through each SLC subsystem into the reactor pressure vessel and to ensure SLC System OPERABILITY.

3.1.7 R_3

The requirement to verify the boron enrichment by analysis within 30 days following each addition of boron to the SLC tank is proposed to be relocated to the procedures. In accordance with SR 3.1.7.10, boron enrichment is verified within 8 hours following addition of boron to the SLC tank. Given that the verification by analysis is not required until 30 days following the addition of boron to the SLC tank and that SR 3.1.7.10 requires verification of SLC boron enrichment within 8 hours following the addition of boron to the SLC tank, the proposed relocated requirement is not necessary to assure SLC boron enrichment is maintained within limits.

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

SECTION 3.1, REACTIVITY CONTROL SYSTEMS (continued)

3.1.7 R_4

The details of performing the SLC pump flow rate surveillance (by pumping boron solution to the test tank) are proposed to be relocated to procedures. These details are not necessary to ensure that SLC System is maintained OPERABLE. The requirements of SR 3.1.7.8 of Specification 3.1.7, SLC System, are adequate to ensure the flow capabilities of the SLC pumps are maintained within the limits required for SLC System OPERABILITY.

3.1.8 R_1

The post maintenance testing requirements for Scram Discharge Volume (SDV) Vent and Drain valves are proposed to be relocated to procedures. Any time the OPERABILITY of a system or component has been affected by repair, maintenance or replacement of a component, post maintenance testing is required to demonstrate OPERABILITY of the system or component. After repair, maintenance or replacement of a system or component that could cause a required SR to be failed, SR 3.0.1 requires the appropriate SRs to be performed to demonstrate the OPERABILITY of the affected components. As a result, the requirements proposed to be relocated are not necessary to ensure the OPERABILITY of the SDV Vent and Drain valves.

3.1.8 R_2

The requirement to record the position of at least one other valve in a line containing an inoperable SDV Vent and Drain valve is proposed to be relocated to procedures. The SRs of Specification 3.1.8, SDV Vent and Drain Valves, provide adequate assurance that the remaining valve in the line is OPERABLE. As a result, for the Condition of one SDV Vent and Drain valve inoperable in one or more lines, the requirements of Specification 3.1.8 ensure the capability exists to isolate the affected penetrations. Therefore, the position (and the requirement to record valve position) of the remaining OPERABLE SDV Vent and Drain valve in the affected line does not affect the capability to isolate the line and is not necessary to ensure this capability exists.

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

SECTION 3.1, REACTIVITY CONTROL SYSTEMS (continued)

3.1.8 R_3

The specific details relating to the design and operation of the SDV Vent and Drain valves (the number of valves, their normal position, and their action on an initiating signal) are proposed to be relocated to the Bases. The detail relating to the number of valves is a design detail that is not necessary to ensure the OPERABILITY of the SDV Vent and Drain valves. The details relating to the normal position of the valves and the action of the valves on an initiating signal are adequately addressed by SR 3.1.8.1 and SR 3.1.8.3 of Specification 3.1.8, SDV Vent and Drain Valves, and need not be explicitly stated in the Technical Specifications.

SECTION 3.2, POWER DISTRIBUTION LIMITS

3.2.1 R_1

The requirement regarding which Average Planar Linear Heat Generation Rate limit to select from the Core Operating Limits Report (COLR) when limits are determined using hand calculations is proposed to be relocated to procedures. The requirements of Specification 3.2.1, Average Planar Linear Heat Generation Rate (APLHGR), are adequate to ensure the APLHGR limits are not exceeded. As a result, the requirement proposed to be relocated is not necessary to ensure the APLHGR limits are maintained.

3.2.2 R_1

The applicability of the MCPR limits are verified by performing scram time testing to determine the average control rod scram time (Tau). The details of the method used to determine Tau and the acceptance criteria associated with Tau are proposed to be relocated to procedures. The requirements for determining the applicable MCPR limit are adequately addressed in SR 3.2.2.2 of Specification 3.2.2, MCPR. As a result, the requirements proposed to be relocated are not necessary for ensuring that the required MCPR limits are maintained.

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

SECTION 3.4, REACTOR COOLANT SYSTEM

3.4.1 R_1

The requirement, "Following one-pump operation, the discharge valve of the low speed pump may not be opened unless the speed of the faster pump is less than 50% of its rated speed," is proposed to be relocated to procedures. This requirement is an instruction on the operation of equipment that is not assumed in safety analyses. Specific requirements related to Recirculation Loop flow mismatch and single recirculation loop operation are adequately addressed in the requirements of Specification 3.4.1, Recirculation Loops Operating. As a result, the proposed relocated requirement is not necessary for ensuring the requirements of Specification 3.4.1 are maintained.

3.4.1 R_2

The stability requirement to obtain baseline APRM and LPRM neutron flux noise data is proposed to be relocated to procedures. This requirement is not necessary to ensure the capability for stability monitoring exists since Required Action A.1 of Specification 3.4.1, Recirculation Loops Operating, will still require (if operating in a region of potential thermal hydraulic instability) APRM and LPRM noise levels to be verified to be $\leq$ 3 times baseline noise levels. As such, the requirement to have baseline APRM and LPRM neutron flux noise data is adequately addressed in Technical Specifications.

3.4.1 R_3

The requirements to immediately initiate action to avoid operation in Region 1 of the power-to-flow map during single recirculation loop operation and to immediately initiate corrective action to restore noise levels to within required limits during operation in Region 1 or 2 of the power-to-flow map are proposed to be relocated to the Bases. These requirements are not necessary for inclusion in Technical Specifications since Required Actions B.1, C.1 and C.2 of Specification 3.4.1, Recirculation Loops Operating, require restoration of the requirements within a limited period of time. As a result, the requirements proposed to be relocated are not necessary for ensuring operation in Region

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

SECTION 3.4, REACTOR COOLANT SYSTEM

3.4.1 R_3 (continued)

1 during single recirculation loop operation or operation in Region 1 or 2 with noise levels exceeding required limits is restricted in accordance with the applicable Technical Specification Completion Times.

3.4.1 R_4

The specific details of the LPRM detectors to use and their location for determining LPRM neutron flux noise levels are proposed to be relocated to the Bases. These details are not necessary to be included in the Technical Specifications to ensure neutron flux noise levels are determined. The neutron flux noise level verification requirements of Required Action A.1 of Specification 3.4.1, Recirculation Loops Operating, are adequate for ensuring neutron flux is determined.

3.4.2 R_1

The requirements for jet pump flow indication instrumentation are proposed to be relocated to procedures. Jet pump flow instrumentation does not necessarily relate directly to the respective system OPERABILITY. In general, the BWR Standard Technical Specifications, NUREG-1433, do not specify indication only equipment to be OPERABLE to support OPERABILITY of a system or component. Control of the availability of, and necessary compensatory activities if not available, for indications, monitoring instruments, and alarms are addressed by plant operational procedures and policies. Therefore, the requirements associated with this instrumentation are proposed to be removed from the Technical Specifications. In addition, the requirements of SR 3.4.2.1 of Specification 3.4.2, Jet Pumps, ensures that adequate flow indication is available to demonstrate jet pump OPERABILITY.

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

SECTION 3.4, REACTOR COOLANT SYSTEM (continued)

3.4.2 R_2

The requirement to obtain baseline data to evaluate jet pump OPERABILITY is proposed to be relocated to procedures. This requirement is not necessary to be included in Technical Specifications since the requirements of SR 3.4.2.1 of Specification 3.4.2, Jet Pumps, requires comparison of data to established patterns. In order to have established patterns a baseline must exist. As such, the requirement to have baseline data to evaluate jet pump OPERABILITY is adequately addressed in Technical Specifications.

3.4.3 R_1

The requirement to disassemble and inspect one relief valve every 24 months is proposed to be relocated to procedures. This requirement is a preventative maintenance type requirement. The failure to perform this requirement does necessarily result in an inoperable relief valve. This requirement is oriented toward long term relief valve OPERABILITY and does not have an immediate impact on relief valve OPERABILITY. Relief valve OPERABILITY is verified by the SRs maintained in Specification 3.4.3, Safety Relief Valves and Safety Valves. As a result, this requirement is not necessary to include in the Technical Specifications.

3.4.3 R_3

The specific details on how to verify that a relief valve is manually opened have been relocated to the Bases. The requirement to manually open each relief valve is adequately addressed in SR 3.4.3.2 of Specification 3.4.3, Safety Relief Valves and Safety Valves. As a result, the requirements proposed to be relocated are not necessary for ensuring each of the relief valves is manually opened once per 24 months.

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

SECTION 3.4, REACTOR COOLANT SYSTEM (continued)

3.4.3 R_4

The requirement to inspect for relief valve accumulator and air piping leakage every 24 months is proposed to be relocated to procedures. This requirement is a preventative maintenance type requirement. The failure to perform this requirement does necessarily result in an inoperable relief valve. This requirement is oriented toward long term relief valve OPERABILITY and does not have an immediate impact on relief valve OPERABILITY. Relief valve OPERABILITY is verified by the SRs maintained in Specification 3.4.3, Safety Relief Valves and Safety Valves. As a result, this requirement is not necessary to include in the Technical Specifications.

3.4.5 R_1

The details regarding how reactor coolant system leakage will be determined (by the primary containment (Drywell) sump collection and flow monitoring system) are proposed to be relocated to the procedures. The requirements of SR 3.4.4.1 of Specification 3.4.4, RCS Operational LEAKAGE, are adequate to determine reactor coolant system leakage is within required limits. As a result, the details relocated to the Bases are not necessary for ensuring reactor coolant system leakage is determined.

3.4.5 R_2

The requirement to record drywell atmosphere radioactivity levels is proposed to be relocated to procedures. The requirement for recording drywell atmosphere radioactivity levels is not necessary to ensure the RCS Operational LEAKAGE is maintained within limits. SR 3.4.4.1 of Specification 3.4.4, RCS Operational LEAKAGE, is adequate to ensure RCS Operational LEAKAGE is maintained within limits. In addition, drywell atmosphere radioactivity levels will still be monitored during the performance of the CHANNEL CHECK of the primary containment atmospheric monitoring system (SR 3.4.5.1).

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

SECTION 3.4, REACTOR COOLANT SYSTEM (continued)

3.4.6 R_1

The additional sampling requirements for reactor coolant and offgas system sampling during startup, following significant power level changes, and following significant changes in offgas radiation levels are proposed to be relocated to procedures. The requirements associated with stack gas continuous gross activity measurement and coolant liquid sample monthly isotopic analysis are also proposed to be relocated to procedures. The results of any of these samples are intended to determine if RCS specific activity is exceeding specified limits. Main Steam Line radiation monitoring requirements are provided in Technical Specifications by Function 11 (Main Steam Line-High Radiation) of Reactor Protection System Instrumentation Table 3.3.1.1-1 and by Function 1.d (Main Steam Line Isolation - Main Steam Line-High Radiation) of Primary Containment Isolation Instrumentation Table 3.3.6.1-1. Offgas radiation monitoring requirements are provided in Technical Specifications by Specification 3.7.5, "Main Condenser Offgas." The combination of these Technical Specification requirements and the requirements of SR 3.4.6.1 of Specification 3.4.6, Specific Activity, provide adequate assurance that RCS specific activity will be maintained within required limits. As a result, the additional sampling requirements and other requirements specified in Table I of CTS 4.6.B (Stack gas continuous gross activity measurement and coolant liquid sample monthly isotopic analysis) are not necessary for assuring RCS specific activity is within required limits.

In addition, the criteria for when specific activity has been returned to limits (until two successive samples indicate a decreasing trend below the limit with at least 3 consecutive samples being taken) are proposed to be relocated to procedures. The requirements of SR 3.4.6.1 of Specification 3.4.6 are adequate for ensuring specific activity is within limits. As a result, the criteria proposed to be relocated are not necessary for assuring specific activity is restored to within limits.

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

SECTION 3.4, REACTOR COOLANT SYSTEM (continued)

3.4.9 R_1

The specific limits for reactor coolant system pressure and temperature are proposed to be relocated to the PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR). Specification 3.4.9, RCS Pressure and Temperature Limits, require the limits in the PTLR to be maintained. In addition, the requirements of Specification 5.6.6, PTLR, provide regulatory controls over the limits proposed to be relocated. As a result, the proposed relocated limits are not required to be included in the Technical Specifications to ensure RCS pressure and temperature are maintained within required limits.

3.4.9 R_2

The criteria for when the RCS temperature surveillance for heatups and cooldowns may be discontinued is proposed to be relocated to procedures. The requirements for when to monitor RCS temperature are adequately addressed in the Note to SR 3.4.9.1 of Specification 3.4.9, RCS Pressure and Temperature Limits. The note states that verification of RCS pressure, temperature, and heatup and cooldown rates is only required to be performed during RCS heatup and cooldown operations and RCS inservice leak and hydrostatic testing. As a result, these criteria are not necessary for ensuring RCS pressure and temperature are maintained within required limits.

3.4.9 R_3

The specific details of the RCS locations for monitoring temperature during heatups and cooldowns are proposed to be relocated to procedures. These details are not necessary to ensure that RCS pressure and temperature are maintained within required limits. The requirements of SR 3.4.9.1 of Specification 3.4.9, RCS Pressure and Temperature Limits, are adequate to ensure RCS pressure and temperature limitations are not exceeded.

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

SECTION 3.4, REACTOR COOLANT SYSTEM (continued)

3.4.9 R_4

The reactor vessel test specimen location and the associated details of the sample program are proposed to be relocated to the PBAPS UFSAR. The requirements proposed to be relocated describe the PBAPS reactor vessel surveillance capsule program requirements established by Appendix H to 10 CFR Part 50. Compliance with Appendix H to 10CFR50 is required by the PBAPS Units 2 and 3 Operating Licenses. As a result, the requirements proposed to be relocated are not necessary for ensuring the reactor vessel surveillance capsule program at PBAPS is maintained.

SECTION 3.5, ECCS AND RCIC SYSTEM

3.5.1 R_1

The details of what constitutes an OPERABLE Core Spray subsystem and an OPERABLE LPCI subsystem have been relocated to the Bases consistent with NUREG-1433. As stated in NEDC-31681,"BWR Owners' Group Improved BWR Technical Specifications," dated April 1989, details for system OPERABILITY are not necessary in the LCO. The definition of OPERABILITY suffices. NEDC-31681 was the BWR Owners' Group Topical Report from which NUREG-1433 was developed.

3.5.1 R_2

The requirements for Core Spray sparger delta P instrumentation are proposed to be relocated to procedures. Core Spray sparger delta P instrumentation does not necessarily relate directly to the respective system OPERABILITY. In general, the BWR Standard Technical Specifications, NUREG-1433, do not specify indication only equipment to be OPERABLE to support OPERABILITY of a system or component. Control of the availability of, and necessary compensatory activities if not available, for indications, monitoring instruments, and alarms are addressed by plant operational procedures and policies. Therefore, the requirements associated with this instrumentation are proposed to be removed from the Technical Specifications.

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

SECTION 3.5, ECCS AND RCIC SYSTEM (continued)

3.5.1 R_3

The specific details of how to demonstrate the ECCS piping is filled with water from the pump discharge valves to the injection valves have been relocated to the Bases. These details are not necessary to ensure that the ECCS piping is filled with water. The requirements of SR 3.5.1.1 of Specification 3.5.1, ECCS-Operating, are adequate to ensure the ECCS lines are filled with water to maintain ECCS OPERABILITY.

3.5.1 R_4

The requirements for Core Spray and LPCI lines "keep fill" system level monitoring instrumentation are proposed to be relocated to procedures. Core Spray and LPCI lines "keep fill" system level monitoring instrumentation does not necessarily relate directly to the respective system OPERABILITY. In general, the BWR Standard Technical Specifications, NUREG-1433, do not specify indication only equipment to be OPERABLE to support OPERABILITY of a system or component. Control of the availability of, and necessary compensatory activities if not available, for indications, monitoring instruments, and alarms are addressed by plant operational procedures and policies. Therefore, the requirements associated with this instrumentation are proposed to be removed from the Technical Specifications.

3.5.1 R_5

Requirements for Engineered Safeguards Compartments Cooling and Ventilation are proposed to be relocated to procedures. Engineered Safeguards Compartments Cooling and Ventilation does support ECCS OPERABILITY. Engineered Safeguards Compartments Cooling and Ventilation inoperabilities do impact ECCS OPERABILITY. As a result, the requirement for Engineered Safeguards Compartments Cooling and Ventilation to be OPERABLE for the ECCS to be considered OPERABLE is adequately addressed in Specification 3.5.1, ECCS-Operating, Specification 3.5.2, ECCS-Shutdown, and the definition of OPERABILITY. There is no need for duplicate requirements in a subsystem LCO since the definition of OPERABILITY suffices.

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

SECTION 3.5, ECCS AND RCIC SYSTEM (continued)

3.5.1 R_6

The specific details on how to verify that an ADS relief valve is manually opened have been relocated to the Bases. The requirement to manually open each ADS relief valve is adequately addressed in SR 3.5.1.12 of Specification 3.5.1, ECCS-Operating. As a result, the requirements proposed to be relocated are not necessary for ensuring each of the ADS relief valves is manually opened once per 24 months.

3.5.2 R_1

The details of what constitutes an OPERABLE Core Spray subsystem and an OPERABLE LPCI subsystem have been relocated to the Bases consistent with NUREG-1433. As stated in NEDC-31681,"BWR Owners' Group Improved BWR Technical Specifications," dated April 1989, details for system OPERABILITY are not necessary in the LCO. The definition of OPERABILITY suffices. NEDC-31681 was the BWR Owners' Group Topical Report from which NUREG-1433 was developed.

3.5.3 R_1

The requirement to include automatic RCIC System restart on low water level during a simulated automatic actuation test has been relocated to the Bases. As stated in NEDC-31681,"BWR Owners' Group Improved BWR Technical Specifications," dated April 1989, this is considered implicit in the system functional test of SR 3.5.3.5. NEDC-31681 was the BWR Owners' Group Topical Report from which NUREG-1433 was developed. As a result, the requirements of SR 3.5.3.5 of Specification 3.5.3, RCIC System, are adequate for ensuring the RCIC System functions as required in response to a low water level signal.

3.5.3 R_2

The requirement to verify automatic transfer of the RCIC pump suction from the CST to the suppression pool on low CST water level has been relocated to the Bases. This is considered implicit in the system functional test of SR 3.5.3.5. As a result, the requirements of SR 3.5.3.5 of Specification 3.5.3, RCIC System, are adequate for ensuring the RCIC System functions as required in response to a low CST water level signal.

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

SECTION 3.5, ECCS AND RCIC SYSTEM (continued)

3.5.3 R_3

The specific details of how to demonstrate the RCIC System piping is filled with water from the pump discharge valves to the injection valves have been relocated to the Bases. These details are not necessary to ensure that the RCIC System piping is filled with water. The requirements of SR 3.5.3.1 of Specification 3.5.3, RCIC System, are adequate to ensure the RCIC System piping is filled with water to maintain RCIC System OPERABILITY.

3.5.3 R_4

Requirements for Engineered Safeguards Compartments Cooling and Ventilation are proposed to be relocated to procedures. Engineered Safeguards Compartments Cooling and Ventilation does support RCIC System OPERABILITY. Engineered Safeguards Compartments Cooling and Ventilation inoperabilities do impact RCIC System OPERABILITY. As a result, the requirement for Engineered Safeguards Compartments Cooling and Ventilation to be OPERABLE for the RCIC System to be considered OPERABLE is adequately addressed in Specification 3.5.3, RCIC System, and the definition of OPERABILITY. There is no need for duplicate requirements in a subsystem LCO since the definition of OPERABILITY suffices.

SECTION 3.9, REFUELING OPERATIONS

3.9.1 R_2

The hoists load limit switch setpoints associated with refueling equipment interlocks are proposed to be relocated to procedures. These setpoints are not assumed in the safety analyses, just the interlocks themselves are assumed to function. In addition, the CHANNEL FUNCTIONAL TEST requirements of SR 3.9.1.1 of Specification 3.9.1, Refueling Equipment Interlocks, are adequate to ensure the interlocks are maintained OPERABLE.

SECTION 3.10, SPECIAL OPERATIONS

None

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

CHAPTER 5.0, ADMINISTRATIVE CONTROLS

5.0 R_4 (last paragraph)

ISEG requirements are proposed to be relocated to the QA Program. Reportable Event interval review requirements, requirement for procedures that meet ANSI N18.7-1972, the requirement that procedures covering Quality Assurance for environmental monitoring use the guidance in Regulatory Guide 4.1, Revision 1, and the Fire Protection Inspection requirements are proposed to be relocated to the UFSAR. The justification for relocating each of these requirements is as follows:

The ISEG performs independent safety reviews. Since the ISEG provides after-the-fact recommendations to improve safety, this organization is not necessary to ensure safe operation of the facility. Therefore, inclusion of the requirements for ISEG in Technical Specifications is not necessary.

The requirements associated with Reportable Event internal reviews prior to submittal of the report to the NRC are not necessary for inclusion in Technical Specifications. Since these internal reviews occur after the event has occurred these requirements are not necessary to ensure safe operation of the facility.

The requirement for procedures that meet Sections 5.1 and 5.3 of ANSI N18.7-1972 is adequately addressed by the requirements of Specification 5.4.1.a and the requirements of 10 CFR 50, Appendix B, as implemented by the QA Program. Section 5.1 of ANSI N18.7-1972 addresses "Rules of Practice" and Section 5.3 of ANSI N18.7-1972 addresses "Operating and Maintenance Procedures". The requirements in Sections 5.1 and 5.3 of ANSI N18.7-1972 are adequately addressed in Appendix A of Regulatory Guide 1.33 and the requirements of 10 CFR 50, Appendix B. Since Specification 5.4.1.a requires procedures to be maintained for the applicable procedures recommended in Appendix A of Regulatory Guide 1.33 and since compliance with 10 CFR 50, Appendix B, is required by the PBAPS Units 2 and 3 Operating Licenses, the proposed relocated requirements are not necessary to ensure safe operation of the facility.

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

CHAPTER 5.0, ADMINISTRATIVE CONTROLS

5.0 R_4 (last paragraph) (continued)

The requirements of Specification 5.4.1.c are adequate to ensure procedures are maintained for Quality Assurance for effluent and environmental monitoring. As such, the requirement specifying the guidance to be used for procedures governing Quality Assurance for environmental monitoring (Regulatory Guide 4.1, Revision 1) is not necessary to ensure the applicable procedures are maintained and is not necessary to ensure safe operation of the facility.

The Fire Protection Inspection requirements are audit inspections performed once per 12 months (by qualified offsite licensee or an outside fire protection firm) and once per 36 months (by a qualified outside fire consultant). These independent audits provide recommendations to improve facility fire protection and are not necessary to ensure safe operation of the facility.

5.0 R_6

The requirements for the Loss of Shutdown Margin Report, the Reactor Vessel Inservice Inspection Report, the Seismic Monitoring Instrumentation Inoperability Report, the Primary Containment Leak Rate Testing Report, and the Sealed Source Leakage Report are proposed to be relocated to procedures. Given that these Special Reports are required to be provided to the Commission no sooner than 10 working days following the event, report completion and submittal is clearly not necessary to assure operation of the facility in a safe manner. Additionally, given there is no requirement for the Commission to approve the reports, these Special Reports are not necessary to ensure operation of the facility in a safe manner.

The information contained in the Bases for Post Accident Sampling is proposed to be relocated to the UFSAR. The requirements of Specification 5.3.3, Post Accident Sampling, are adequate to ensure the Post Accident Sampling Program requirements are maintained. As a result, the information in the Bases is not necessary to ensure operation of the facility in a safe manner.

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4, SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

CHAPTER 5.0, ADMINISTRATIVE CONTROLS (continued)

5.0 R_{15}

The references to ASTM Standards (which specify certain diesel fuel oil testing) and acceptance criteria for diesel fuel oil testing have been relocated to the Bases of SR 3.8.3.3 of Specification 3.8.3, Diesel Fuel Oil, Lube Oil, and Starting Air. The requirements of Specification 5.5.9, Diesel Fuel Oil Testing Program, and SR 3.8.3.3 are adequate to ensure the required diesel fuel oil testing is performed. SR 3.8.3.3 of Specification 3.8.3 requires diesel fuel oil testing to be performed in accordance with the Diesel Fuel Oil Testing Program and the requirements of Specification 5.5.9 provide regulatory controls over the testing requirements proposed to be relocated. As a result, the requirements proposed to be relocated are not required to be included in the Technical Specifications to ensure required diesel fuel oil testing is performed.

5.0 R_{16}

The requirements for monitoring explosive gas downstream of the Off-Gas Recombiners are proposed to be relocated to procedures. The requirements of Specification 5.5.8, Explosive Gas Monitoring Program, are adequate to ensure explosive gas mixtures downstream of the Off-Gas Recombiners are maintained within limits. Specification 5.5.8 provides regulatory control over the limitations and surveillances proposed to be relocated. As a result, the requirements proposed to be relocated are not required to be included in the Technical Specifications to ensure explosive gas mixtures downstream of the Off-Gas Recombiners are maintained within limits.

APPENDIX B, ENVIRONMENTAL TECHNICAL SPECIFICATIONS

None

QUESTION

AI-2 Identify any differences between the Unit 2 ITS and the Unit 3 ITS for Chapter 2.0, Sections 3.1, 3.2, 3.4, 3.5, 3.9, and 3.10, Chapter 5.0 and Appendix B.

ADDITIONAL INFORMATION REGARDING
PBAPS ITS CHAPTER 2.0, SECTION 3.1, SECTION 3.2, SECTION 3.4,
SECTION 3.5, SECTION 3.9, SECTION 3.10, AND CHAPTER 5.0

RESPONSE

AI-2 Differences between the PBAPS Unit 2 and Unit 3 ITS and Bases (as applicable) for Chapter 2.0, Sections 3.1, 3.2, 3.4, 3.5, 3.9, and 3.10, Chapter 5.0 and Appendix B are identified in the marked up pages in Attachment A.