

• Mr. Charles H. Cruse
 Vice President - Nuclear Energy
 Baltimore Gas and Electric Company
 Calvert Cliffs Nuclear Power Plant
 1650 Calvert Cliffs Parkway
 Lusby, MD 20657-4702

June 6, 1997

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING THE TECHNICAL SPECIFICATIONS CHANGE REQUEST TO CONVERT TO THE IMPROVED TECHNICAL SPECIFICATIONS FOR THE CALVERT CLIFFS NUCLEAR POWER PLANT, UNIT NOS. 1 AND 2 (TAC NO. M97363 AND M97364)

Dear Mr. Cruse:

On December 4, 1996, Baltimore Gas and Electric Energy (BGE), submitted a license amendment request to convert the Calvert Cliffs Nuclear Power Plant, Units 1 and 2 Current Technical Specifications to the Improved Technical Specifications (ITS). During the course of our review, we found that we require additional information to complete our evaluation. Please respond to the enclosed request for information (RAI) that seeks to clarify the ITS Sections 3.3.3 through 3.3.12. We anticipate sending staff comments on Sections 3.7 and 3.8 to you next week.

In a telephone discussion with BGE on June 2, 1997, the staff said they would not support the Technical Specifications Task Force (TSTF) changes 198 through 203 on battery testing. BGE said that the supplement would include use of NUREG-1432 in instances previously indicated for those TSTF changes. The staff anticipates receipt of the supplement the first week of June. Review of the supplement should assist in the conversion to the Standard Technical Specifications and preparation of the draft Safety Evaluation report. To support the NRC staff's review schedule, your written and electronic response in WordPerfect 5.1 to this RAI is requested within 15 days of the receipt of this letter. Should you have any questions, please do not hesitate to contact me at (301) 415-3473.

Sincerely,

Guy Vissing for
 Alexander W. Dromerick, Senior Project Manager
 Project Directorate I-1
 Division of Reactor Projects - I/II
 Office of Nuclear Reactor Regulation

Docket Nos. 50-317
 and 50-318

Enclosure: RAI

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

June 6, 1997

Mr. Charles H. Cruse
Vice President - Nuclear Energy
Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
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Sincerely,

A handwritten signature in cursive script, appearing to read "Alex Dromerick".

Alexander W. Dromerick, Senior Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket Nos. 50-317
and 50-318

Enclosure: RAI

cc w/encl: See next page

June 6, 1997

Mr. Charles H. Cruse
Baltimore Gas and Electric Company

Calvert Cliffs Nuclear Power Plant
Units Nos. 1 and 2

cc:

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CCNPP ITS 3.3.3 REACTOR PROTECTIVE SYSTEM (RPS) LOGIC AND TRIP INITIATION tabl333.cc1

3.3.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.3		<p>CTS 4.3.1.1.1 requires a Channel Functional Test (CFT) for Matrix Logic, Trip Path Logic, and RTCBs as shown in CTS Table 4.3-1. ITS 3.3.3 moves the CFT requirements to ITS SR 3.3.3.1, RTCB channels every 31 days, and ITS 3.3.3.2, RPS Logic channels (Functions 12 and 13 of CTS Table 4.3-1) and RTCB channels every 92 days. This requires the CFT for the RTCBs at two frequencies; ITS SR 3.3.3.1, every 31 days, and ITS SR 3.3.3.2, every 92 days.</p>	<p>Clarify that this double testing is intended in the ITS.</p>	<p>6/2/97 open</p>
BGE Response:					
2	M.1		<p>The CTS 3.3.1.1 Applicability for the Manual Trip is MODES 1 and 2, and with any RTCBs closed and the CEA system capable of CEA withdrawal. ITS 3.3.3 changes the Applicability for these functions to MODES 1 and 2, and MODES 3, 4, and 5, with any RTCBs closed and any CEA capable of being withdrawn. Adding MODES 3, 4, and 5 to the APPLICABILITY "with any RTCBs closed and the CEA system capable of CEA withdrawal" is an administrative change.</p>	<p>Address this change to the Manual Trip APPLICABILITY and provide justification for it as an administrative change.</p>	<p>6/2/97 open</p>
BGE Response:					
3	M.6		<p>CTS 4.3.1.1.1 does not require a CHANNEL FUNCTIONAL TEST (CFT) for the Manual Reactor Trip Function in any specific MODE. The CFT is, however, required by CTS Table 4.3-1 within 7 days prior to startup. ITS SR 3.3.3.3 requires the test once within 7 days prior to startup for Modes 1 and 2, and Modes 3, 4, and 5 with any RTCBs closed and any CEAs capable of being withdrawn. The surveillance in both the CTS and the ITS is required for all operating MODES, within 7 days prior to startup (before exiting MODE 6). The change and justification support this change as an administrative change.</p>	<p>Provide additional discussion and justification for this change, describing how it is more restrictive, or reclassifying as administrative.</p>	<p>6/2/97 open</p>

CCNPP ITS 3.3.3 REACTOR PROTECTIVE SYSTEM (RPS) LOGIC AND TRIP INITIATION tab1333.cc1

3.3.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response:					
4			The STS 3.3.3 NOTE in Conditions B and C are adopted as notes in Required Actions B.1 and C.1, respectively, in ITS 3.3.3. This deviation from the STS is based on TSTF-181 (CEOG-93), which has not yet been approved by the NRC.	Acceptance of this change is contingent on NRC approval of TSTF-181 (CEOG-93).	6/2/97 open
BGE Response:					
5			The wording of STS 3.3.3 Required Action C.1 to "Open all RTCBs" is not adopted; rather ITS 3.3.3 Required Action C.1 states "Open the affected RTCBs." This deviation from the STS is based on TSTF-170 (CEOG-73), which has not yet been approved by the NRC.	Acceptance of this change is contingent on NRC approval of TSTF-170 (CEOG-73).	6/2/97 open
BGE Response:					
6			ITS 3.3.3 Condition D lists two inoperable manual trip channels in addition to two inoperable channels of RTCBs or initiation logic affecting the same trip leg as specified in STS 3.3.3 Condition D. This deviation from the STS is based on TSTF-182 (CEOG-94), which has not yet been approved by the NRC.	Acceptance of this change is contingent on NRC approval of TSTF-182 (CEOG-94).	6/2/97 open
BGE Response:					
7			The wording of STS 3.3.3 Condition E, "One or more Functions with," is omitted from corresponding ITS 3.3.3 Condition E. This deviation from the STS is based on TSTF-183 (CEOG-95), which has not yet been approved by the NRC.	Acceptance of this change is contingent on NRC approval of CEOG-95.	6/2/97 open
BGE Response:					

CCNPP ITS 3.3.3 REACTOR PROTECTIVE SYSTEM (RPS) LOGIC AND TRIP INITIATION tabl333.cc1

3.3.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
8			ITS SR 3.3.3.1, a 31-day CHANNEL FUNCTIONAL TEST on each RTCB channel, is not specified in STS 3.3.3. This deviation from the STS is based on TSTF-79, which was modified, but not yet approved, by the NRC on 3/17/97.	Acceptance of this change is contingent on NRC approval of TSTF-79.	6/2/97 open
BGE Response:					

CCNPP ITS 3.3.4 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) INSTRUMENTATION tab1334.cc1

3.3.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.6		<p>CTS 4.3.2.1.2 requires demonstrating the total bypass logic during the at-power Channel Functional Test. ITS 3.3.4 moves this bypass testing requirement to unidentified plant procedures. The justification does not identify the plant procedure that maintains this requirement nor the specific controls that maintain the requirement in plant procedures.</p>	<p>Provide additional discussion and justification, identifying the plant procedures that contain the requirement to demonstrate the bypass logic during the at-power Channel Functional Test, and controls over changes to that requirement.</p>	6/2/97 open
BGE Response:					
2	LA.5		<p>CTS Table 3.3-4 contains "Trip Setpoint" and "Allowable Values" columns. ITS Table 3.3.4-1 contains only the "Allowable Values" column. Specific trip setpoints are maintained in plant procedures. The justification for deleting the "Trip Setpoint" column from ITS Table 3.3.4-1 does not identify the plant procedures that maintain the trip setpoints nor the specific controls that maintain the requirement in plant procedures.</p>	<p>Provide additional discussion and justification, identifying the plant procedures that contain the trip setpoints, and controls over changes to the trip setpoints in those plant procedures.</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.4 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) INSTRUMENTATION tabl334.cc1

3.3.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	LA.3		<p>CTS Table 3.3-3 Action 7.b requires, within one hour, placing all functional units receiving a parameter input from the inoperable channel in the same tripped or bypassed condition as the inoperable trip channel. DOC LA.3 states this requirement is moved to the Safety Function Determination Program (SFDP) of ITS 5.5.15. Although the SFDP is activated under ITS LCO 3.0.6 and ITS LCO 3.0.6 would apply when ITS LCO 3.3.4 is not met, it is not certain that the SFDP would require taking the same action as Action 7.b of CTS Table 3.3-3 or an equivalent action.</p>	<p>Revise the submittal to fully explain how Action 7.b of CTS Table 3.3-3 will be accomplished under the ITS. In addition, this is an L-type, not an LA-type change.</p> <p>See comment 3.3.1-04</p> <p>See comment 3.3.4-12</p>	6/2/97 open
BGE Response:					
4	M.3		<p>The justification for this change states that CTS Table 3.3.3 Action 7.c does not specify a time for placing the additional inoperable channel in bypass and ITS 3.3.4, Action B, requires placing one channel in trip and one channel in bypass in one hour. The justification does not address the reason for placing the additional inoperable channel in bypass - the reason being testing and maintenance, with a 48 hour limit (both CTS and ITS) from the beginning of testing. Therefore, the one hour limit of ITS 3.3.1, Action B, to place the channel under test in bypass is a less restrictive change providing a 1 hour extension of the allowed outage time (AOT) for testing and maintenance that is not justified.</p>	<p>Provide discussion and justification for this less restrictive change that provides a 1 hour extension of the AOT for testing and maintenance.</p> <p>See comment 3.3.1-05</p>	6/2/97 open
BGE Response:					

CCNPP ITS 3.3.4 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) INSTRUMENTATION tabl334.cc1

3.3.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5	L.1		<p>CTS Table 3.3-3, Action 11, Containment Spray Actuation System (CSAS), Containment Pressure - High, when one or two sensor (trip) channels are inoperable, allows continued operation with one inoperable channel provided the inoperable channel is bypassed and the other channels are demonstrated OPERABLE within one hour. ITS 3.3.4, Action A, allows one hour to place the affected sensor (trip) module in bypass or trip. There is no ITS requirement to demonstrate the remaining sensor (trip) channels OPERABLE within one hour. This less restrictive change from the CTS is not justified.</p>	<p>Provide justification for this less restrictive change removing the requirement to verify the remaining Containment Pressure - High channels OPERABLE within one hour.</p>	<p>6/2/97 open</p>
BGE Response:					
6	L.1		<p>CTS Table 3.3-3, Action 11, Containment Spray Actuation System (CSAS), Containment Pressure - High, when one or two channels are inoperable, allows continued operation with one inoperable channel provided the inoperable channel is bypassed. One additional channel may be bypassed for surveillance testing for up to 2 hours. ITS 3.3.4, Action B, allows one hour to place one affected sensor (trip) module in bypass and the other affected sensor (trip) module in trip. This more restrictive change to the ITS requires bypassing one sensor (trip) module and bypassing the other rather than the CTS requirement to bypass both. This more restrictive change is not justified.</p>	<p>Provide justification for this more restrictive change requiring bypassing one sensor (trip) module of the Containment Pressure - High instrumentation and bypassing the other rather than the CTS requirement to bypass both.</p>	<p>6/2/97 open</p>
BGE Response:					

CCNPP ITS 3.3.4 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) INSTRUMENTATION tabl334.cc1

3.3.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
7	L.2		<p>ITS Table 3.3.4-1 adds Footnote c to the CTS Table 3.3-3 footnotes. This footnote allows the Steam Generator Isolation Signal (SGIS) function and the Steam Generator Pressure - Low signal and the Containment Pressure - High signal to be inoperable when all associated valves isolated by the SGIS function are closed and deactivated. DOC L.2 does not discuss the Containment Pressure - High signal nor why it is included in the footnote. Further, Footnote c is not applied in ITS Table 3.3-3 for any function associated with Containment Pressure - High.</p>	<p>Provide additional discussion for this less restrictive change, addressing the inclusion of the Containment Pressure - High function in the footnote.</p>	6/2/97 open
BGE Response:					
8	A.1 LA.6		<p>CTS 4.3.2.1.2 requires demonstrating the logic for the automatic block removal function Operable during the at-power Channel Functional Tests of channels affected by blocks. These CFTs are required quarterly by CTS Table 4.3-2 for Functions --</p> <ul style="list-style-type: none"> 1.c (Pressurizer Pressure - Low) and 4.b (Steam Generator Pressure - Low). <p>ITS Table 3.3.4-1, for Functions --</p> <ul style="list-style-type: none"> 1.b (Pressurizer Pressure - Low) and 4.a (Steam Generator Pressure - Low), <p>requires a CFT on each automatic block removal feature (total bypass function) at a 24-month Frequency (ITS SR 3.3.4.3) rather than quarterly. This less restrictive change in the Frequency for testing the logic for the bypasses is not justified.</p>	<p>Provide justification for this less restrictive change extending the CFT Frequency for the logic for the automatic block removal features for the two functions listed from 3 months to 24 months.</p>	6/2/97 open
BGE Response:					

CCNPP ITS 3.3.4 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) INSTRUMENTATION tabl334.cc1

3.3.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
9			<p>STS 3.3.4 Actions Note allows separate Condition entry for each "ESFAS trip or bypass removal Function." Corresponding ITS 3.3.4 Actions Note allows separate Condition entry for each "ESFAS Function." This difference in wording from the STS is based on TSTF-178 (CEOG-89), which has not yet been approved by the NRC.</p>	<p>Acceptance of this STS deviation is based on NRC approval of TSTF-178 (CEOG-89).</p>	<p>6/2/97 open</p>
BGE Response:					
10		26	<p>In the event of one or more Functions with the automatic block removal feature of one sensor block inoperable, ITS 3.3.4 Action C, does not require restoring the bypass removal channel and affected trip units to Operable status within 48 hours or placing the affected unit in trip within 48 hours as required by STS 3.3.4 Required Action D.2.2.1 or Required Action D.2.2.2.</p> <p>JFD-26's justification for not adopting these STS requirements appears to be consistency with ITS 3.3.1 Required Actions A.2.1 and A.2.2, which allows within 48 hours either restoring the affected bistable trip unit and associated measurement channel to Operable status or placing the affected unit in trip, which places the unit in a one-out-of-three coincidence logic. Thus, indefinite operation is allowed once the function is in a one-out-of-three coincidence logic.</p> <p>Since the STS action requirements are logically the same as the action requirements of ITS 3.3.1, they should be adopted. JFD-26 does not explain how ITS 3.3.4 Required Actions C.1 and C.2 result in placing the unit in a one-out-of-three coincidence logic. Therefore, the justification for this STS deviation is inadequate.</p>	<p>Revise the submittal to adopt the STS action requirements.</p>	<p>6/2/97 open</p>
BGE Response:					

CCNPP ITS 3.3.4 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) INSTRUMENTATION tab1334.cc1

3.3.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
11	LA.1		<p>Portions of CTS 3.3.2.1, SIAS Endnote @, which discusses when to place the high pressure safety injection pumps in pull-to-lock, are moved to unidentified plant procedures. The justification does not identify the plant procedure that maintains this requirement nor the specific controls that maintain the requirement in plant procedures.</p>	<p>Provide additional discussion and justification, identifying the plant procedures that contain the requirement for placing the high pressure safety injection pumps in pull-to-lock, and controls over changes to that requirement.</p>	6/2/97 open
BGE Response:					
12	LA.3		<p>CTS Table 3.3-3, Action 7.b, requires placing all functional units receiving a parameter input from the inoperable channel in the same tripped or bypassed condition as the inoperable trip channel within one hour. ITS 3.3.4 does not require this action. This requirement is moved to the Safety Function Determination Program (SFDP) of ITS 5.5.15.</p> <p>DOC LA.3 states that changes to the SFDP are in accordance with the plant change control process. The plant change control process is not identified.</p>	<p>Revise the submittal to describe the regulatory basis for the plant change control process and how changes to the SFDP implementing procedures will be approved.</p>	6/2/97 open
BGE Response:					

CCNPP ITS 3.3.4 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) INSTRUMENTATION tabl334.cc1

3.3.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
13			<p>ITS Table 3.3.4-1, Function 1.b, SIAS - Pressurizer Pressure - Low</p> <p>CTS Table 3.3-3, Functional Unit 1.c, SIAS - Pressurizer Pressure - Low</p> <p>CTS markup indicates CTS Table 3.3-3 Notation (a) corresponds to ITS Table 3.3.4-1 Note (b), but the ITS clearly indicate it corresponds to ITS Table 3.3.4-1 Note (a).</p>	<p>Confirm that the ITS is correct and correct the CTS markup.</p>	<p>6/2/97 open</p>
BGE Response:					
14	A.8		<p>ITS 3.3.4, Table 3.3.4-1, Function 2.a, CSAS - Containment Pressure - High</p> <p>Note (b) to ITS Table 3.3.4-1</p> <p>CTS Table 3.3-3, Functional Unit 2.b, CSAS - Containment Pressure - High</p> <p>DOC A.8 and the CTS Table 3.3-3 markup indicate that Note (c) of ITS Table 3.3.4-1 is being added, but the ITS designates this note as Note (b) to ITS Table 3.3.4-1.</p>	<p>Confirm that the ITS is correct, and correct the CTS markup and DOC A.8.</p>	<p>6/2/97 open</p>
BGE Response:					
15	L.2		<p>ITS Table 3.3.4-1 Note (c)</p> <p>STS Table 3.3.4-1 Note (d)</p> <p>ITS Note (c) is a new note that relaxes the CTS operability requirements on the steam generator isolation signal function (steam generator pressure - low) when all valves closed by SGIS are closed and deactivated.</p>	<p>Why does the note also include the containment pressure - high function? (Note that the STS includes it too.)</p>	<p>6/2/97 open</p>

CCNPP ITS 3.3.4 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) INSTRUMENTATION tab1334.cc1

3.3.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response:					
16			<p>CTS Table 3.3-3 Markup (page 3 of 16)</p> <p>Action 7 is marked as being replaced by ITS ACTIONS B and C for Functional Units 4.B Steam Generator Pressure - Low, 5.B Refueling Water Tank - Low, and 9. Auxiliary Feedwater Actuation System. The markup should indicate ITS ACTIONS A and B. Verify that this is correct and correct the markup.</p>	Revise the submittal with a corrected markup.	6/2/97 open
BGE Response:					
17			<p>ITS 3.3.4 ACTION B Note ITS Table 3.3.4-1 Function 9. AFAS CTS Table 3.3-3 Action 7 CTS Table 3.3-3 Notation *</p> <p>CTS Action 7 applies to the AFAS functional units but CTS Notation * (LCO 3.0.4 does not apply) does not apply to the AFAS functions. ITS 3.3.4 ACTION B Note, corresponding to CTS Notation *, applies to the AFAS functions.</p>	The submittal contains no justification for adding the LCO 3.0.4 exception to the AFAS functions. Revise the submittal with this justification.	6/2/97 open
BGE Response:					

CCNPP ITS 3.3.5 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) LOGIC AND MANUAL ACTUATION tabl335.cc1

3.3.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.8		<p>CTS Table 3.3-3 Action 6 requires restoring an inoperable ESFAS Actuation Logic channel to OPERABLE status within 48 hours, or being in MODE 3 within 6 hours and in MODE 5 within 36 hours. ITS 3.3.5 Actions, when one channel in one or more functions is inoperable, allows 48 hours to restore the inoperable ESFAS Actuation Logic channel to OPERABLE status. If not restored within 48 hours, MODE 3 is required within 6 hours. MODE 5 is not required for ITS 3.3.5 Actions B and E for not meeting the Required Actions and Completion Times of Actions A and C (one actuation logic channel), respectively. ITS 3.3.5 Actions B and E require shutdown to MODE 4. There is no justification for requiring MODE 4 rather than MODE 5 for this less restrictive change.</p>	<p>Provide justification for this less restrictive change and discussion justifying the shutdown to MODE 4 rather than MODE 5 for ITS 3.3.5, Actions B and E.</p>	6/3/97 open
<p>BGE Response:</p>					

CCNPP ITS 3.3.5 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) LOGIC AND MANUAL ACTUATION tab1335.cc1

3.3.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	A.8		<p>CTS Table 3.3-3 Action 6 does not address multiple inoperable redundant channels. If two or more channels in one or more function are inoperable, entry into CTS 3.0.3 is required. ITS 3.3.5 Action B when two Manual Auxiliary Feedwater Actuation System (AFAS) Logic channels are inoperable, requires MODE 3 within 6 hours and MODE 4 within 12 hours. ITS 3.3.5 Action D, for two Manual non-AFAS Manual Trip or Actuation Logic channels are inoperable, requires MODE 3 within 6 hours and MODE 5 within 36 hours. The justification states that in this situation both the CTS and the ITS require entering (CTS or ITS LCO) 3.0.3. The justification does not include discussion of ITS 3.3.5, Actions B and D, which are entered for multiple inoperable channels.</p>	<p>Provide additional justification including when ITS LCO 3.0.3 is required for two or more channels in one or more functions are inoperable and when ITS 3.3.5, Actions B and D, are required.</p>	6/3/97 open
BGE Response:					
3	A.8		<p>CTS Table 3.3-3, Action 6, does not address multiple inoperable channels within a Function. If two or more channels in one or more functions are inoperable, entry into CTS 3.0.3 is required. ITS 3.3.5, Actions B and D, do not address when two AFAS Actuation Logic channels are inoperable, yet address other multiple redundant channels. It is not clear that this entry into ITS LCO 3.0.3 for the two AFAS Actuation Logic channels is intentional.</p>	<p>Provide additional discussion for ITS 3.3.5, Actions B and D, when two AFAS Actuation Logic channels are inoperable.</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.5 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) LOGIC AND MANUAL ACTUATION tabl335.cc1

3.3.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4	LA.2		<p>CTS Table 4.3-2, Endnotes (2) through (6), discuss the logic circuits that cannot be tested during power operation. They are identified as only tested at least once per REFUELING INTERVAL during shutdown. These endnotes are moved to unidentified plant procedures. Change control of these requirements moved to procedures is not specifically identified.</p>	<p>Provide additional justification and discussion, identifying the plant procedures that contain the CTS Table 4.3-2, Endnotes (2) through (6), requirements, and how those requirements are controlled.</p>	6/3/97 open
BGE Response:					
5	A.4		<p>CTS Table 4.3-2 and Endnote (1) require performing the CHANNEL FUNCTIONAL TEST of the ESFAS automatic actuation logic manually every 31 days. ITS SR 3.3.5.1 requires performing a CHANNEL FUNCTIONAL TEST of each ESFAS actuation logic channel every 92 days. This less restrictive change extending the CTS Table 4.3-2 Surveillance Test Interval from 31 days to 92 days is not justified.</p>	<p>Provide justification for extending the Surveillance Test Interval from 31 days to 92 days.</p> <p>Note: Consistent with the STS.</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.5 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) LOGIC AND MANUAL ACTUATION tabl335 cc1

3.3.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
6	A.9		<p>CTS Table 3.3-3, Function 9.a, requires two sets of two manual trip buttons per steam generator (a total of eight pushbuttons). ITS 3.3.5 requires two channels for manual start of the Auxiliary Feedwater Actuation System (AFAS) A and AFAS B, ITS Table 3.3.5-1, Function 9.a. The justification discusses the ITS Table 3.3.5-1, Function 9.a, requirement for two manual start channels, one for AFAS A and one for AFAS B. The justification does not discuss the acceptability of changing the CTS Table 3.3-3, Function 9.a, two sets of two manual trip buttons per steam generator, to the ITS Table 3.3.5-1, Function 9.a, two channels for manual start, one for AFAS A and one for AFAS B.</p>	<p>Provide additional discussion and justification for changing the CTS Table 3.3-3, Function 9.a, two sets of two manual trip buttons per steam generator (a total of eight pushbuttons), to the ITS Table 3.3.5-1, Function 9.a, two channels.</p>	6/3/97 open
BGE Response:					
7	A.9		<p>CTS Table 3.3-3, Function 9.a, requires two sets of two manual trip buttons per steam generator (a total of eight pushbuttons). ITS Table 3.3.5, Function 9.a, requires two channels for manual start of the Auxiliary Feedwater Actuation System (AFAS) Signal. The justification for this change states that ITS Table 3.3.5-1, Function 9, requires two channels for manual start, one for AFAS A and one for AFAS B (Function 9.a). ITS Table 3.3.5 does not separate the requirements on a per AFAS basis or a per steam generator basis. Manual Start is listed, and ITS 3.3.5 requires 2 channels, not the eight pushbuttons of CTS Table 3.3-3, Function 9.a.</p>	<p>Provide additional discussion and justification for this administrative change, showing how ITS 3.3.5 implements the CTS Table 3.3-3 requirements.</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.5 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) LOGIC AND MANUAL ACTUATION tab1335.cc1

3.3.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
8			ITS Table 3.3.5-1, adds Function 6.c, Steam Generator 1 Isolation (Block) Logic, and Function 6.d, Steam Generator 2 Isolation (Block) Logic, to STS Table 3.3.5-1. The ITS 3.3.5 BASES, LCO 6, does not include a description of ITS Table 3.3.5-1, Function 6.c and 6.d.	Provide a description of ITS Table 3.3.5-1, Function 6.c, Steam Generator 1 isolation (Block) Logic, and Function 6.d, Steam Generator 2 Isolation (Block) Logic in the ITS 3.3.5 BASES, LCO.	6/3/97 open
BGE Response:					
9			ITS 3.3.5, Condition B, adds a second Condition to STS 3.3.5, Condition B. The Condition added is two AFAS Manual Actuation Logic channels inoperable. ITS 3.3.5, Condition D, adds a second Condition to STS 3.3.5, Condition D. The Condition added is one or more Functions with two non-AFAS Manual Trips or Actuation Logic channels inoperable. The additions are based on TSTF-187 (CEOG-99) which has not yet been approved by the NRC. However, with this STS deviation, there is no specific Condition that provides Actions for 2 inoperable, non-manual AFAS Actuation Logic Channels.	Provide additional discussion and justification for this change, showing how ITS 3.3.5 provides appropriate Actions for 2 inoperable, non-manual AFAS Actuation Logic Channels. Acceptance of this STS deviation is contingent on NRC approval of CEOG-99 (TSTF-187).	6/3/97 open
BGE Response:					
10			CEOG-99 (TSTF-187) ITS 3.3.5 Action B The Condition "Two AFAS Manual Actuation Logic channels inoperable" is added to Condition B. It appears that this wording means "Two AFAS Manual Start channels or two Actuation Logic channels inoperable." This difference is based on TSTF-187 which has not yet been approved.	Verify Condition B is worded correctly and revise the STS markup and ITS ACTIONS Condition B accordingly. Acceptance of this difference is dependent upon NRC approval of TSTF-187 or a plant-specific justification which would have to be added to the submittal.	6/3/97 open

CCNPP ITS 3.3.5 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM (ESFAS) LOGIC AND MANUAL ACTUATION tab1335.cc1

3.3.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response:					
11			<p>ITS 3.3.5</p> <p>As presented, ITS Table 3.3.5-1 indicates that the operability of the manual actuation and the operability of the actuation logic for each function are independent; thus manual actuation and actuation logic may be treated as separate "functions." Even if the operability is independent, this does not appear consistent with the CTS and the STS.</p>	<p>Revise the submittal to clarify the intent of the CTS, the STS, and the proposed ITS.</p>	<p>6/3/97 open</p>
BGE Response:					
12		<p>4 12</p>	<p>ITS Table 3.3.5-1</p> <p>The titles of the functions in Table 3.3.5-1 use the word "channel." This is misleading given the wording of LCO 3.3.5, which requires two channels of each function to be operable.</p>	<p>Revise the table to omit the word channel in the function titles.</p>	<p>6/3/97 open</p>
BGE Response:					

CCNPP ITS 3.3.6 DIESEL GENERATOR (DG) - LOSS OF VOLTAGE START (LOVS) tabl336.cc1

3.3.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L.3		<p>CTS Surveillance Requirement 4.3.2.1.3 requires response time testing for the DG-LOVS instrumentation on a staggered test basis every 24 months. ITS 3.3.6 does not require response time testing for the DG-LOVS instrumentation because the DG-LOVS instrumentation response time is negligible compared to the ten second DG start time required, and does not contribute significantly to determining operability of the DGs. The DG start time testing of ITS SR 3.8.1.16 verifies the DG starts within 10 seconds of a actual or simulated loss of power in conjunction with a actual or simulated ESFAS. ITS SR 3.8.1.16 is satisfied with a less than 10 second start, regardless of whether the start signal from the LOVS instrument Functions is timely. For instance, the ITS SR 3.8.1.16 testing could show satisfactory results based on the ESFAS initiation with the LOVS initiations being inadequate to meet the 10 second requirement. The justification does not show that both LOVS Functions (Loss of Voltage and Degraded Voltage) meet the response time requirements.</p>	<p>Provide additional discussion and justification showing the response time testing for the DG start is inclusive of the DG-LOVS instrumentation response time for both LOVS Functions.</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.6 DIESEL GENERATOR (DG) - LOSS OF VOLTAGE START (LOVS) tab1336.cc1

3.3.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	LA.2		<p>CTS Table 3.3-3, Action 7.b, requires, within one hour, placing all functional units receiving a parameter input from the inoperable channel in the same tripped or bypassed condition as the inoperable trip channel. ITS 3.3.6 does not require this Action. This requirement is moved to the Safety Function Determination Program (SFDP) of ITS 5.5.15. However, the SFDP is activated under ITS 3.0.6, which is not required by any ITS 3.3.6 ACTION, and does not accomplish CTS Table 3.3-3, Action 7.b, or an equivalent action.</p>	<p>Provide additional discussion and justification, identifying how CTS Table 3.3-3 Action 7.b is accomplished under the ITS.</p> <p>See comment 3.3.4-03</p>	6/3/97 open
BGE Response:					
3	LA.2		<p>CTS Table 3.3-3, Action 7.b, requires placing all functional units receiving a parameter input from the inoperable channel in the same tripped or bypassed condition as the inoperable trip channel within one hour. ITS 3.3.6 does not require this action. This requirement is moved to the Safety Function Determination Program (SFDP) of ITS 5.5.15. The justification states that changes to the SFDP are in accordance with the plant change control process. The plant change control process is not identified.</p>	<p>Provide additional discussion and justification, identifying the plant procedures that maintain control over the plant change control process and controls over changes to the SFDP.</p> <p>See comment 3.3.4-12</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.6 DIESEL GENERATOR (DG) - LOSS OF VOLTAGE START (LOVS) tab1336.cc1

3.3.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4	A.4 M.1		<p>With one inoperable LOVS channel in trip, CTS Table 3.3-3, Action 7.c, allows bypassing an additional channel for test or maintenance for up to 48 hours. ITS 3.3.6, Action B, allows placing either of two inoperable channels in trip and bypassing the remaining inoperable channel, without restriction on the second channel, that is, the second channel can be inoperable for testing, maintenance, or for any other reason. This is a less restrictive change because the second LOVS channel can be inoperable for reasons other than the CTS Table 3.3-3, Action 7.c, allowed testing and maintenance. Adding the allowance for the second inoperable channel to the CTS Table 3.3-3, Action 7.c, allowance for reasons other than testing and maintenance is not justified.</p>	<p>Provide discussion and justification for this less restrictive change that provides for bypassing a second inoperable channel for reasons other than testing and maintenance.</p> <p>See comment 3.3.1-05 and 3.3.4-04</p>	6/3/97 open
BGE Response:					
5	L.1		<p>CTS 3.3.2.1 and Table 3.3-3 do not require Actions if more than two channels are inoperable; immediate entry into CTS 3.0.3 (shutdown) is required. ITS 3.3.6 Action C allows one hour to restore all but two DG - Loss of Voltage channels per DG to OPERABLE status if more than two (three or four) channels are inoperable. This increases the Completion Time for the action from immediately to one hour.</p>	<p>Provide additional discussion and justification for this less restrictive change that changes the Completion Time from immediately initiating a shutdown to 1 hour to restore all but two DG - Loss of Voltage channels per DG to OPERABLE status.</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.6 DIESEL GENERATOR (DG) - LOSS OF VOLTAGE START (LOVS) tab1336.cc1

3.3.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
6	L.1 L.2		<p>Because CTS 3.3.2.1 and Table 3.3-3 contain no Actions for more than two channels inoperable, entry into CTS 3.0.3 is required. ITS 3.3.6 Action C allows one hour to restore all but two DG - Loss of Voltage channels per DG to OPERABLE status if more than two (three or four) channels are inoperable per DG. If restoration is not completed within one hour, ITS 3.3.6 Action D is required. This changes the required action from initiating a shutdown to entering the actions for the associated DG made inoperable by this condition, allowing operation to continue. While the justification notes that this change prevents a shutdown, the justification does not show that a shutdown is not necessary under these circumstances. As separate condition entry is allowed for each Function, the overall total of inoperable equipment may warrant a shutdown rather than continued operation.</p>	<p>Provide additional discussion and justification for this less restrictive change to the required action from initiating a shutdown to entering the actions for the associated DG made inoperable by this condition, allowing operation to continue.</p>	6/3/97 open
BGE Response:					
7	LA.3		<p>CTS Table 3.3-4 contains "Trip Setpoint" and "Allowable Values" columns. ITS 3.3.6 does not maintain the Trip Setpoint requirements. Specific trip setpoints are maintained in plant procedures. The justification for deleting the "Trip Setpoint" column from CTS Table 3.3-4 does not identify the plant procedures that maintain the trip setpoints nor the specific controls that maintain the requirement in plant procedures.</p>	<p>Provide additional discussion and justification, identifying the plant procedures that contain the trip setpoints, and controls over changes to the trip setpoints in those plant procedures.</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.6 DIESEL GENERATOR (DG) - LOSS OF VOLTAGE START (LOVS) tabl336.cc1

3.3.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
8			CTS Table 3.3-4 contains "Trip Setpoint" and "Allowable Values" columns. ITS 3.3.6 does not maintain the Allowable Value requirements. There is no justification for deleting the "Allowable Values" column from CTS Table 3.3-4. This is not in conformance with the STS, which includes the allowable values in STS SR 3.3.6.2. This difference from the STS is based on TSTF-91 which was rejected by the NRC on 3/14/97. (See TSTF meeting summary dated April 8, 1997).	Revise the submittal to include Allowable Values in ITS SR 3.3.6.2, consistent with STS SR 3.3.6.3 and CTS Table 3.3.4 Functional Units 7.a and 7.b.	6/3/97 open
BGE Response:					
9		19	STS 3.3.6 applies in MODES 1, 2, 3, and 4, and when the associated DG is required OPERABLE by STS 3.8.2. ITS 3.3.6 applies only in MODES 1, 2, and 3. Not requiring the DG - LOVS instrumentation OPERABLE in MODE 4 and when the associated DG is required OPERABLE by ITS 3.8.2 is because ESFAS APPLICABILITY is MODES 1, 2, and 3. The justification does not address the requirements for DG OPERABILITY which includes SHUTDOWN conditions.	Revise the submittal to conform to the Applicability of STS 3.3.6.	6/3/97 open
BGE Response:					
10	L.2		ITS 3.3.6 Required Action D.1 - Bases discussion DOC L.2 and the Bases refer to LCO 3.8.2 for appropriate action requirements in response to Required Action D.1. Since the Applicability of ITS 3.3.6 is Modes 1, 2, and 3, only entering the action requirements of ITS 3.3.1, not ITS 3.3.2, would be appropriate.	Revise the Bases and DOC L.2 to correct this error.	6/3/97 open

CCNPP ITS 3.3.6 DIESEL GENERATOR (DG) - LOSS OF VOLTAGE START (LOVS) tab1336.cc1

3.3.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response:					
11	A.13		<p>ITS SR 3.3.6.1 Notes 1 and 2 STS SR 3.3.6.2</p> <p>a. The allowances of Notes 1 and 2 in ITS SR 3.3.6.1, Channel Functional Test of the DG loss of voltage instrumentation, are not explicitly specified in corresponding CTS 4.3.2.1.1 (Functional Unit 7 of CTS Table 3.3-3). Thus including them in SR 3.3.6.1 is a less restrictive change.</p> <p>b. DOC A.13 states the inclusion of Notes 1 and 2 in ITS SR 3.3.6.1 is consistent with the NUREG-1432 (the STS). However, the STS does not include them in corresponding STS SR 3.3.6.2, and the STS markup offers no specific justification for this difference.</p>	<p>Revise the submittal with an appropriate justification of this less restrictive change.</p> <p>Revise the submittal with an appropriate justification of this apparently plant-specific difference from the STS.</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.7 CONTAINMENT RADIATION SIGNAL (CRS) tab1337.cc1

3.3.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L.1		<p>CTS 3.3.2.1 and CTS Table 3.3-3, Function 6.a, require two Containment Purge Valve Isolation Manual Trip channels per penetration OPERABLE. ITS 3.3.7 reduces this requirement to one Manual Actuation channel. The required actions in the event a channel is inoperable are either ITS 3.3.7 Required Action B.1 (based on CTS Table 3.3-3 Action 8) or ITS 3.3.7 Required Action B.2, to enter the applicable Conditions and Required Actions of ITS 3.9.3. The justification does not explain why ITS 3.3.7 Required Action B.2 is an acceptable option to Required Action B.1.</p>	<p>Provide additional discussion and justification for this less restrictive change, addressing the adequacy of ITS 3.3.7, Required Action B.2, for an inoperable Containment Purge Valve Isolation Manual Trip channel.</p>	6/3/97 open
BGE Response:					
2	M.2		<p>In the event less than the required number of containment radiation monitors are OPERABLE, CTS Table 3.3-3 Action 8 allows continued operation if the containment purge isolation valves are kept closed. ITS 3.3.7 Action A requires, if one radiation monitor sensor module or associated measurement channel is inoperable with the containment purge valves or containment vent valves open, placing the affected sensor module in trip, or suspending Core Alterations and all movement of irradiated fuel assemblies within containment. This less restrictive change adds options of tripping the affected sensor module or suspending Core Alterations and movement of irradiated fuel assemblies within containment. The justification does not address this less restrictive change.</p>	<p>Provide additional discussion and justification for this less restrictive change, addressing the adequacy of ITS 3.3.7, Action A, for fewer than the required number of containment radiation monitors OPERABLE.</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.7 CONTAINMENT RADIATION SIGNAL (CRS) tab1337.cc1

3.3.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4	M.3 M.4 A.8		<p>In the event less than the required number of containment radiation monitors are OPERABLE, CTS Table 3.3-3 Action 8 allows continued operation provided the containment purge isolation valves are kept closed. ITS 3.3.7 Action B requires, if one required manual Actuation channel or Actuation Logic channel is inoperable, or more than one instrument channel is inoperable, or the Completion Time of ITS 3.3.7, Action A, is not met, either closing the containment purge and exhaust valves and maintaining them in a closed position, or entering the applicable Conditions and Required Actions of ITS 3.9.3, which requires suspending Core Alterations and all movement of irradiated fuel assemblies within containment. By providing alternative Actions, this is a less restrictive change. The justification does not address or justify this as a less restrictive change.</p>	<p>Provide additional discussion and justification for this less restrictive change.</p>	6/3/97 open
BGE Response:					
5	LA.1		<p>CTS Table 3.3-4 contains a "Trip Setpoint" column and an "Allowed Values" column. ITS 3.3.7 contains only the allowable values for the trip setpoints. These specific trip setpoints are moved in plant procedures. The justification does not identify the plant procedures receiving these trip setpoints nor the specific controls that maintain the requirement in plant procedures.</p>	<p>Provide additional discussion and justification, identifying the plant procedures that contain the trip setpoints, and controls over changes to the trip setpoints in those plant procedures.</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.7 CONTAINMENT RADIATION SIGNAL (CRS) tabl337.cc1

3.3.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
6	LA.3		<p>CTS Table 4.3-2, Functional Unit 6.a, requires a CHANNEL FUNCTIONAL TEST (CFT) for the manual purge valve control switches every refueling interval. ITS SR 3.3.7.5 requires a CFT of the Containment Radiation Signal Manual Actuation Channels every 24 months. This is justified as a Less Restrictive Removal of Requirements rather than as an administrative change.</p>	<p>Provide justification for this as an administrative change or provide details clearly showing the details removed from the CTS requirements.</p>	6/3/97 open
BGE Response:					
7			<p>STS 3.3.7 Required Actions B.1 and B.2 are connected by an 'AND' logical connector. Corresponding ITS 3.3.7 Required Actions B.1 and B.2 are connected by an 'OR' logical connector. Changing the logical connector from 'AND' to 'OR' is based on TSTF-185 (CEOG-97) which has not yet been approved by the NRC.</p>	<p>Provide justification for this STS deviation based on current licensing basis, system design, and operational constraints. Acceptance of this STS deviation is based on NRC approval of TSTF-185 (CEOG-97).</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.8 CONTROL ROOM RECIRCULATION SIGNAL (CRRS) tabl338.cc1

3.3.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		15	<p>STS/ITS 3.3.8 Applicability STS/ITS 3.3.8 Actions A, C</p> <p>The Applicability of STS 3.3.8 is MODES 1, 2, 3, 4, 5, and 6, during CORE ALTERATIONS, and during movement of irradiated fuel. The Applicability of corresponding ITS 3.3.8 is only MODES 1, 2, 3, and 4. This difference in Applicability is also reflected in certain STS action requirements that are not being adopted in the ITS. JFD-15 does not explain why this specification need not be applicable during CORE ALTERATIONS and during movement of irradiated fuel, except to say the proposed Applicability is based on consistency with the plant design and current testing methods. The submittal should discuss the system design and testing methods to make clear why the entire Applicability of STS 3.3.8, and related action requirements, need not be adopted.</p>	<p>Revise the submittal to justify this STS difference in Applicability and action requirements by discussing the system design and the adequacy of current testing practices.</p>	6/3/97 open
BGE Response:					
2		4	<p>STS SR 3.3.8.1, CHANNEL CHECK, is not adopted in ITS 3.3.8. JFD-4 does not directly justify this STS deviation nor explain why a Channel Check is not needed based on system design and testing practices.</p>	<p>Provide justification for this STS deviation based on system design and the adequacy of current testing practices.</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.8 CONTROL ROOM RECIRCULATION SIGNAL (CRRS) tab1338.cc1

3.3.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3		15	STS SR 3.3.8.3, CHANNEL FUNCTIONAL TEST of the Actuation Logic, and SR 3.3.8.5, CHANNEL FUNCTIONAL TEST of the Manual Trip, are not adopted in ITS 3.3.8. JFD-15 does not explain how the system design and testing practices justify omission of these surveillances.	Provide justification for this STS deviation based on system design and the adequacy of current testing practices.	6/3/97 open
BGE Response:					
4		3	Why does STS SR 3.3.8.6, response time testing, not need to be adopted in ITS 3.3.8? The justification for this STS deviation is based on incorporating plant specific information into brackets not sufficient basis.	Revise the submittal to explain why response time testing is unnecessary for the control room recirculation signal.	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.9 CHEMICAL AND VOLUME CONTROL SYSTEM (CVCS) ISOLATION SIGNAL tab1339.cc1

3.3.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.4		<p>The CTS Table 3.3-3 requirements for the CVCS Isolation Manual Initiation, Function 8.a, are moved to unidentified plant procedures. ITS 3.3.9 does not contain requirements for manual initiation of the CVCS Isolation system. The justification does not identify the plant procedures receiving these CVCS manual initiation requirements nor the specific controls that maintain the requirement in plant procedures.</p>	<p>Provide additional discussion and justification, identifying the plant procedures that contain the CVCS manual initiation requirements, and controls over changes to the requirement in plant procedures.</p>	6/3/97 open
BGE Response:					
2	LA.2		<p>CTS Table 3.3.3 Action 7.b requires placing all functional units receiving a parameter input from the inoperable channel in the same tripped or bypassed condition as the inoperable trip channel within one hour. ITS 3.3.9 does not require this action. This requirement is moved to the Safety Function Determination Program (SFDP) of ITS 5.5.15. However, the SFDP is activated under ITS 3.0.6, which is not required by any ITS 3.3.9 ACTION, and does not accomplish CTS Table 3.3-3, Action 7.b, or an equivalent action.</p>	<p>Provide additional discussion and justification, identifying how CTS Table 3.3-3, Action 7.b, is accomplished under ITS 3.3.9.</p> <p>See comment 3.3.4-3</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.9 CHEMICAL AND VOLUME CONTROL SYSTEM (CVCS) ISOLATION SIGNAL tab1339.cc1

3.3.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	LA.2		<p>CTS Table 3.3-3, Action 7.b, requires placing all functional units receiving a parameter input from the inoperable channel in the same tripped or bypassed condition as the inoperable trip channel within one hour. ITS 3.3.9 does not require this action. This requirement is moved to the Safety Function Determination Program (SFDP) of ITS 5.5.15. The justification states that changes to the SFDP are in accordance with the plant change control process. The plant change control process is not identified.</p>	<p>Provide additional discussion and justification, identifying the plant procedures that maintain control over the plant change control process and controls over changes to the SFDP that affect the CTS Table 3.3-3, Action 7.b, requirement for placing all functional units receiving a parameter input from the inoperable channel in the same tripped or bypassed condition as the inoperable trip channel within one hour.</p> <p>See comment 3.3.4-12</p>	6/3/97 open
BGE Response:					
4	M.2		<p>CTS 3/4.3.2.1 does not include specific requirements if an Action cannot be completed within the required Completion Time, or if two Actuation Logic channels are inoperable. Thus, entering CTS 3.0.3 is required if the Action is not completed within the Completion Time or if two Actuation Logic channels are inoperable. CTS 3.0.3 allows 7 hours to reach MODE 3, and 13 hours to reach MODE 4. ITS 3.3.9 Action D is added for when two Actuation Logic channels are inoperable, or the Required Action and Associated Completion Times cannot be met. It requires MODE 3 in 6 hours and MODE 5 in 36 hours. No justification is provided for changing the CTS 3.0.3 - 13 hour requirement to reach MODE 4 to the ITS 3.3.9, Action D, 36 hour requirement to reach MODE 5.</p>	<p>Provide discussion and justification for this change from the CTS 3.0.3 - 13 hour requirement to reach MODE 4 to the ITS 3.3.9, Action D, 36 hour requirement to reach MODE 5.</p>	6/3/97 open

CCNPP ITS 3.3.9 CHEMICAL AND VOLUME CONTROL SYSTEM (CVCS) ISOLATION SIGNAL tabl339.cc1

3.3.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response:					
5	LA.3		CTS Table 3.3-4 contains "Trip Setpoint" and "Allowable Values" columns. ITS SR 3.3.9.2 contains only the "Allowable Values" column. Specific trip setpoints are maintained in plant procedures. The justification for deleting the CTS Table 3.3-4 "Trip Setpoint" column does not identify the plant procedures that maintain the trip setpoints nor the specific controls that maintain the requirement in plant procedures.	Provide additional discussion and justification, identifying the plant procedures that contain the trip setpoints, and controls over changes to the trip setpoints in those plant procedures.	6/3/97 open
BGE Response:					
6			ITS 3.3.9 adds the note "LCO 3.0.4 is not applicable" to ITS 3.3.9, Action C. The note "LCO 3.0.4 is not applicable" is not contained in STS 3.3.9, Action C. This STS deviation is based on TSTF-84. On 4/22/97 BGE indicated by e-mail that TSTF-84 was being withdrawn from the submittal.	Verify that the changes associated with TSTF-84 have been withdrawn.	6/3/97 open
BGE Response:					
7			ITS 3.3.9 adds the condition "two Actuation Logic Channels inoperable" to Action D, that is not contained in STS 3.3.9, Action D. This STS deviation is based on TSTF-187 (CEGG-99) which has not yet been approved by the NRC.	Acceptance of this STS deviation is based on NRC approval of TSTF-187 (CEGG-99).	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.9 CHEMICAL AND VOLUME CONTROL SYSTEM (CVCS) ISOLATION SIGNAL tab1339.cc1

3.3.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
8		4	<p>ITS SR 3.3.9.2 limits CHANNEL FUNCTIONAL TESTING of relays associated with plant equipment that cannot be operated during plant operation to once per 24 months, instead of the STS SR 3.3.9.2 "during each MODE 5 entry exceeding 24 hours unless tested within the previous 6 months." This STS deviation is not justified by JFD-4.</p>	<p>Provide a plant-specific justification for this STS deviation based on current licensing basis or system design.</p>	6/3/97 open
BGE Response:					
9	A.11	4	<p>ITS SR 3.3.9.2 Notes 1 and 2 CTS 4.3.2.1.1 for Table 4.3-2 Functional Unit 8 "CVCS Isolation"</p> <p>a. Notes 1 and 2 for ITS SR 3.3.9.2 have been adopted as an administrative change. However, because Note 1 specifies a requirement not explicitly given in CTS 4.3.2.1.1, adopting it is a more restrictive change. In addition, because Note 2 specifies an allowance not given in CTS 4.3.2.1.1, adopting it is a less restrictive change.</p> <p>b. ITS SR 3.3.9.2 Note 2 is less restrictive than the corresponding Note 2 of STS SR 3.3.9.2. The STS markup indicates that JFD 4 explains the basis for the difference. However, JFD 4 does not explain why it is acceptable to only test the relays "once per 24 months" instead of "during each Mode 5 entry exceeding 24 hours unless tested within the previous 6 months."</p>	<p>a. Revise the submittal with appropriate justifications.</p> <p>b. Revise the submittal with a JFD to address this difference.</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.9 CHEMICAL AND VOLUME CONTROL SYSTEM (CVCS) ISOLATION SIGNAL tabl339.cc1

3.3.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
10	M.3		<p>ITS SR 3.3.9.1 CTS 4.3.2.1.1 CTS Table 4.3-2 Functional Unit 8 "CVCS Isolation"</p> <p>A Channel Check for the CVCS Isolation functional unit is adopted as ITS SR 3.3.9.1 and justified by DOC M.3, as indicated on the markup of CTS Table 4.3-2. However, the markup of CTS 4.3.2.1.1 mistakenly lists this DOC as M.4, which doesn't exist.</p>	Revise the submittal to correct this error.	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.9 CHEMICAL AND VOLUME CONTROL SYSTEM (CVCS) ISOLATION SIGNAL tabl339.cc1

3.3.9	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
11	A.1 LA.4		<p>ITS 3.3.9 ACTIONS A and D CTS 3/4.3.2.1 Action b and Table 3.3-3 Action 6 for Functional Unit 8.a "Manual (CVCS Isolation Valve Control Switches) CTS 3/4.3.2.1 Action b and Table 3.3-3 Functional Unit 8.b "CVCS Isolation"</p> <p>a. CTS Table 3.3-3 Action 6 corresponds to both ACTION A and ACTION D of ITS 3.3.9. The markup of CTS Table 3.3-3 (page 3/4 3-15) does not show the correspondence to ACTION D.</p> <p>b. CTS Table 3.3-3 Action 6 is listed with Functional Unit 8.a, not with 8.b. All requirements for Functional Unit 8.a are moved from the CTS to plant procedures according to DOC LA.4. Yet Action 6 is treated as being retained for Functional Unit 8.b, "CVCS Isolation." Only CTS Action 7 is listed with Functional Unit 8.b. Thus, applying the requirements of Action 6 to Functional Unit 8.b in ITS 3.3.9 is a more restrictive change.</p>	<p>a. Revise the CTS markup accordingly.</p> <p>b. Revise the submittal with an appropriate justification for applying the requirements of Action 6 to Functional Unit 8.b.</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.10 POST-ACCIDENT MONITORING (PAM) INSTRUMENTATION tabl3310.cc1

3.3.10	DCC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.2		<p>CTS Table 3.3-10 Note * states that a channel of the Reactor Vessel Water Level instrumentation consists of eight sensors per probe, and that a channel is OPERABLE if four or more sensors (one or more among the upper three and three or more in the lower five) are OPERABLE. The justification for deleting these details from ITS 3.3.10 states these details are relocated to the BASES <i>and</i> moved to plant procedures. LA.2 is not clear as to the disposition of these design details and the controls that maintain these details once they are removed from the ITS.</p>	<p>Provide additional discussion and justification for moving these details, documenting the recipient documentation for these design details and controls over changes to the details located in that documentation.</p>	6/4/97 open
BGE Response:					
2			<p>CTS Table 3.3-10 Instrument 3, Reactor Coolant Outlet Temperature, requires a minimum of 2 channels Operable. Corresponding ITS Table 3.3.10-1, Function 2, Reactor Coolant Outlet Temperature, requires 2 indication channels per loop Operable. The change from a minimum of 2 channels to 2 indication channels per loop appears to be a more restrictive change.</p>	<p>Revise the submittal to justify the change from a minimum of 2 channels to 2 indication channels per loop.</p>	6/4/97 open
BGE Response:					

CCNPP ITS 3.3.10 POST-ACCIDENT MONITORING (PAM) INSTRUMENTATION tabl3310.cc1

3.3.10	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3			<p>CTS Table 3.3-10 Instrument 9 and ITS Table 3.3.10-1, Function 4, RCS Subcooled Margin Monitor, require a single instrument channel for this Regulatory Guide 1.97, Type A, variable. The ITS 3.3.10 Actions for that inoperable channel are the same as the ITS 3.3.10 Actions for the loss of a single channel of a Function with redundant channels. It is not clear how the loss of the single RCS Subcooled Margin Monitor channel is compensated for as it is the only indicator of RCS Subcooled Margin. This deviates from STS 3.3.11, as redundant instrument channels are required for all variables in STS Table 3.3.11-1.</p>	<p>Justify having the same action for both the inoperability of the only required RCS Subcooled Margin Monitor channel and the inoperability of one channel of a redundant pair of instrument channels.</p> <p>Provide justification for this STS deviation based on current licensing basis and system design.</p>	6/4/97 open
BGE Response:					
4	LA.8 LA.10		<p>CTS Table 3.3-6 requires two channels of Containment Area High Range monitors OPERABLE in MODES 1, 2, 3, and 4. In addition, CTS Table 4.3-3 specifies surveillances to be met in these Modes. Corresponding ITS Table 3.3.10-1 does not specify these requirements in Mode 4, which is a less restrictive change. The Mode 4 requirements are moved to unidentified plant procedures.</p>	<p>Provide additional discussion and justification for moving this detail, documenting the plant procedure containing this requirement and controls over changes to this requirement located in that procedure.</p>	6/4/97 open
BGE Response:					

CCNPP ITS 3.3.10 POST-ACCIDENT MONITORING (PAM) INSTRUMENTATION tabI3310.cc1

3.3.10	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5	LA.8 LA.10		<p>CTS Table 3.3-6 requires two Containment Area High Range monitors in MODES 1, 2, 3, and 4. Similarly, CTS Table 4.3-6 requires surveillances for this PAM instrumentation to be met in Modes 1, 2, 3, and 4. Corresponding ITS 3.3.10 and Table 3.3.10-1 require two PAM channels of Containment Area Radiation (high range) and corresponding testing requirements (SR 3.3.10.1 and SR 3.3.10.3) in MODES 1, 2, and 3 only. The deletion of the MODE 4 from the Applicability is a less restrictive change. LA.8 does not explain why this PAM instrumentation is not needed in Mode 4.</p>	<p>Revise the submittal to discuss and justify this less restrictive change, documenting why CTS Table 3.3-6 and 4.3-3 requires two channels of Containment Area High Range monitors OPERABLE in MODE 4 and detailing the acceptability of deleting that requirement.</p>	6/4/97 open
BGE Response:					
6			<p>CTS Table 3.3-6 lists for Instrument 1.b, Containment Area High Range monitors, a range of 1 to 10⁴ R/hr and a alarm/trip setpoint of ≤ 10 R/hr. The disposition of the required range and the alarm/trip setpoint is not identified in the markup of CTS Table 3.3-6. These requirements are not contained in corresponding ITS 3.3.10 for Function 9.</p>	<p>Revise the submittal to identify and justify the removal of the required range and the alarm/trip setpoint for the Containment Area High Range monitors.</p>	6/4/97 open
BGE Response:					

CCNPP ITS 3.3.10 POST-ACCIDENT MONITORING (PAM) INSTRUMENTATION tbl3310.cc1

3.3.10	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
7			ITS Table 3.3.10-1 Function 4, RCS Subcooled Margin Monitor, requires a single instrument channel for this Regulatory Guide 1.97, Type A, variable. The ITS 3.3.10 Bases states the "two SMMs consist of redundant microprocessor based instruments," indicating one analog indicator for the two microprocessor based channels.	Provide additional discussion, clarifying there are 2 required channels for this Type A variable in ITS Table 3.3-10, as required by Regulatory Guide 1.97.	6/5/97 open
BGE Response:					
8	LA.7		The requirements for CTS Table 3.3-10, PAM Instrumentation, include requirements for the non-Category 1 variables Auxiliary Feedwater (AFW) Flow Rate, Power-Operated Relief Valve (PORV)/Safety Valve Acoustic Flow Monitoring, PORV Solenoid Power Indication, and Feedwater Flow. These requirements are moved to unidentified plant procedures.	Provide additional discussion and justification for moving these PAM instrumentation requirements, documenting the plant procedures containing these requirements and controls over changes to these requirements located in those procedures.	6/5/97 open
BGE Response:					
9	LA.6		CTS Table 4.3-10, Footnote *, requires calibrating the core exit thermocouple prior to installation into the reactor core. This requirement is moved to unidentified plant procedures.	Provide additional discussion and justification for moving the requirement to calibrate the core exit thermocouple prior to installation into the reactor core, documenting the plant procedures containing these requirements and controls over changes to these requirements located in those procedures.	6/5/97 open
BGE Response:					

CCNPP ITS 3.3.10 POST-ACCIDENT MONITORING (PAM) INSTRUMENTATION tabl3310.cc1

3.3.10	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
10	LA.12		CTS Table 4.3-3, requires a CHANNEL CHECK of the Containment Area High Range radiation monitors each shift. ITS SR 3.3.10.1 requires a monthly CHANNEL CHECK for these PAM instrument channels. The requirement for the CHANNEL CHECK every shift is moved to unidentified plant procedures.	Revise the submittal documenting the plant procedures containing the shiftly Channel Check requirement and controls over changes to these procedures.	6/5/97 open
BGE Response:					
11	LA.12		CTS Table 4.3-3, requires a CHANNEL CHECK of the Containment Area High Range radiation monitors each shift. ITS SR 3.3.10.1 requires a monthly CHANNEL CHECK for these PAM instrument channels. Decreasing the Channel Check Frequency from shiftly to monthly is a less restrictive change.	Revise the submittal to justify the Channel Check Frequency relaxation as a L-type change.	6/6/97 open
BGE Response:					
12	LA.4		CTS Surveillance Requirement 4.6.5.1.1 requires demonstrating each hydrogen analyzer is OPERABLE at least biweekly, on a Staggered Test Basis, by drawing a sample from the Waste Gas System through the hydrogen analyzer. This requirement is moved to unidentified plant procedures. In addition, no justification is given for removing this surveillance from CTS.	Provide additional discussion and justification for moving the requirement for demonstrating each hydrogen analyzer is OPERABLE, documenting the plant procedures containing these requirements and controls over changes to these requirements located in those procedures.	6/6/97 open
BGE Response:					

CCNPP ITS 3.3.10 POST-ACCIDENT MONITORING (PAM) INSTRUMENTATION tab13310.cc1

3.3.10	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
13	LA.9		<p>CTS Table 3.3-6, Action 30, requires, with the number of channels of Containment Area High Range radiation monitors less than that required, initiating an alternate pre-planned method of monitoring within 72 hours. The 72-hour requirement to implement the pre-planned alternative method of monitoring this variable is moved to an unidentified procedure.</p>	<p>Provide additional discussion and justification for moving the requirement for implementing the pre-planned alternative method of monitoring this variable, documenting the plant procedures containing these requirements and controls over changes to these requirements located in those procedures.</p>	6/6/97 open
BGE Response:					
14	LA.11		<p>CTS Table 4.3-3, requires a monthly CHANNEL FUNCTIONAL TEST (CFT) of the Containment Area High Range Radiation Monitor. This CTS Table 4.3-3 CFT requirement is not required by ITS 3.3.10, and is moved to unidentified plant procedures.</p>	<p>Revise DOC LA.11 to contain additional discussion and justification for moving the requirement for a monthly CHANNEL FUNCTIONAL TEST of the Containment Area High Range Radiation Monitor, documenting the plant procedures containing these requirements and controls over changes to these requirements located in those procedures.</p>	6/6/97 open
BGE Response:					

CCNPP ITS 3.3.10 POST-ACCIDENT MONITORING (PAM) INSTRUMENTATION tab13310.cc1

3.3.10	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
15			<p>ITS Table 3.3.10-1 Function 4 requires a single RCS Subcooled Margin Monitor channel. For this Function, ITS Table 3.3.10-1 requires Condition F when referenced from ITS 3.3.10, Action E. However, for Action E to apply, and hence, Action F, the Action C is not completed. Action C is required when two required indication channels are inoperable, a condition that can not occur for Function 4, RCS Subcooled Margin Monitor, because only one channel is required by ITS Table 3.3.10-1. Thus, the ITS Table 3.3.10-1, Function 4, entry for Condition F (a forced shutdown), is not possible with the single RCS Subcooled Margin Monitor channel.</p>	<p>Provide discussion on how the loss of the RCS Subcooled Margin Monitor channel requires the forced shutdown of ITS 3.3.10-1, Condition F, as required by ITS Table 3.3.10-1, Function 4.</p>	6/6/97 open
BGE Response:					

CCNPP ITS 3.3.11 REMOTE SHUTDOWN INSTRUMENTATION tabl3311.cc1

3.3.11	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.1		The CTS 3.3.3.5 and CTS Table 3.3-9 details of the readout location and measurement range of the individual instruments for the Remote Shutdown Instrumentation are moved to unidentified plant procedures and the Updated Final Safety Analysis Report.	Provide additional discussion and justification for moving the details of the readout location and measurement range of the individual instruments, documenting the plant procedures containing these requirements and controls over changes to these requirements located in those procedures.	6/6/97 open
BGE Response:					
2	LA.1		The CTS 3.3.3.5 and CTS Table 3.3-9 details of the readout location and measurement range of the individual instruments for the Remote Shutdown Instrumentation are moved to unidentified plant procedures and the Updated Final Safety Analysis Report. The justification for moving these requirements does not discuss the acceptability nor the safety impact of moving these requirements.	Provide additional discussion and justification for moving the details of the readout location and measurement range of the individual instruments, discussing the acceptability and the safety impact of moving these requirements.	6/6/97 open
BGE Response:					
3			CTS Table 4.3-6 specifically requires the wide-range steam generator level channels for the remote shutdown instrumentation. Corresponding ITS Table 3.3.11-1, while requiring steam generator level instrumentation, does not specifically require the wide-range channels. Not controlling the requirement for the wide-range channels in ITS 3.3.11 could result in their replacement with the narrow-range channels.	Provide justification and discussion on moving of the specific requirement for wide-range channels to monitor the steam generator level for the remote shutdown instrumentation.	6/6/97 open

CCNPP ITS 3.3.7 CONTAINMENT RADIATION SIGNAL (CRS) tabl337.cc1

3.3.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	M.1		<p>In the event fewer than the required number of containment radiation monitors are OPERABLE, CTS Table 3.3-3 Action 8 allows continued operation provided the containment purge isolation valves are maintained closed. This allowance has no time limit. ITS 3.3.7, Action A, requires, if one instrument channel is inoperable, either placing the affected sensor module in trip within 4 hours, or immediately suspending Core Alterations and all movement of irradiated fuel assemblies within containment. The justification does not explain why the 4 hour Completion Time of ITS 3.3.7 Required Action A.1 (similar to the 1 hour limit in ITS 3.3.2, Required Action A.1) is acceptable.</p>	<p>Provide additional discussion and justification for this more restrictive change, addressing the adequacy of ITS 3.3.7, Action A, Completion Times.</p> <p>Note: The ITS 3.3.7 Completion Times are consistent with the STS.</p>	6/3/97 open
BGE Response:					

CCNPP ITS 3.3.11 REMOTE SHUTDOWN INSTRUMENTATION tab13311.cc1

3.3.11	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
BGE Response:					
4		JFD 17	STS SR 3.3.12.2 verifies each required control circuit and transfer switch is operational. ITS 3.3.11 does not adopt STS SR 3.3.12.2 because it is not required in the CTS. The justification does not discuss system design and operational constraints that preclude adding this requirement to ITS 3.3.11.	Revisae the submittal to adopt this STS surveilance requirement or provide justification for this STS deviation based on current licensing basis, system design, and operational constraints.	6/6/97 open
BGE Response:					
5			The Bases discussion of ITS 3.3.11 Required Action A.1 states that the control and transfer switches are included in the Functions required OPERABLE. However, the control and transfer switches are not included in ITS Table 3.3.11-1, and have no requirements in ITS 3.3.11.	Resolve this discrepancy between ITS 3.3.11 and the ITS 3.3.11 Bases.	6/6/97 open
BGE Response:					

CCNPP ITS 3.3.12 WIDE-RANGE LOGARITHMIC NEUTRON FLUX MONITOR CHANNELS tab13312.cc1

3.3.12	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.3 LA.1		<p>CTS Table 3.3-1 contains a "Total No. of Channels" column, a "Minimum Channels Operable" column, and a "Channels to Trip" column, requiring 4 wide-range logarithmic neutron flux monitor channels, at least 3 OPERABLE, and 2 channels to trip. Corresponding ITS 3.3.12 requires 2 OPERABLE channels of wide-range logarithmic neutron flux monitor channels. The change from the CTS Table 3.3-1 minimum of 3 OPERABLE wide-range logarithmic neutron flux monitor channels to 2 OPERABLE channels in ITS 3.3.12 is a less restrictive change that is not justified.</p>	<p>Provide justification and discussion showing the acceptability of the change from the CTS Table 3.3-1 minimum of 3 OPERABLE wide-range logarithmic neutron flux monitor channels to 2 OPERABLE channels in ITS 3.3.12.</p>	6/6/97 open
BGE Response:					