May 16, 1997

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

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 2.0 Safety Limits, 3.1 Reactivity Control Systems, 3.2 Power Distribution Limits, 3.5 Emergency Core Cooling Systems, and 3.9 Refueling.

On May 15, 1997, in a telephone conference with Brian D. Mann, of BGE and NRC staff, Mr. Mann said that the supplement to the Calvert Cliffs conversion amendment would be sent to the NRC on May 31, 1997. The staff anticipates that review of the supplement will assist in the Calvert Cliffs conversion to the Standard Technical Specifications. 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,

Original Signed By

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

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Calvert Cliffs Nuclear Power Plant
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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

cc:

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CCNPP ITS 2.0 SAFETY LIMITS

2.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		JFD 7	Applicability changed from "closure bolts not fully tensioned" to "is unbolted," to be consistent with MODES in section 1.	"Not fully tensioned" is more accurate. Change section 1 not safety limits.	
CC Response					

CCNPP ITS 3.1.1 SHUTDOWM MARGIN

3.1.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.1		CTS 3.1.1.1 and 3.1.1.2 Actions require that boration at greater than 40 GPM of 2300 ppm boric acid solution or equivalent until the Shutdown Margin is restored. ITS 3.1.1 does not contain this information as it is moved to plant procedures. However, the specific procedures are not identified. There is no discussion of how the Calvert Cliffs procedure control process meets the regulatory control requirements.	Provide specific plant procedure where the requirement is located (i.e., relocate to TRM) and a discussion of the regulatory controls provided.	
CC Response					
2	L.2		CTS 3.1.1.2.b. Action requires that positive reactivity changes shall be suspended when the pressurizer is drained to < 90 inches and all sources of non-borated water is > 88 gpm. ITS has deleted this requirement based on a boron dilution analysis for three charging pumps. There is no justification provided for deleting the requirement rather than revising the limits to match the new boron dilution analysis.	Incorporate the limiting requirements of the boron dilution analysis into the ITS or provide justification for the deletion of the requirements.	
CC Response					

CCNPP ITS 3.1.2 REACTIVITY BALANCE

3.1.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L.1		CTS 3.1.1.1 Action required immediate boration initiation if the SHUTDOWN MARGIN was outside the limits provided in COLR. ITS 3.1.2 requires an evaluation to determine it the reactor core is acceptable for continued operation, and to establish operating restrictions and SRs. The completion time for this Action is 7 days. STS 3.1.3 requires the same action but the time tc complete was 72 hours. There is no justification provided for increasing the completing time from 72 hours to 7 days.	The ITS completion time is not consistent with either CTS or the STS Completion time. Justification required. Submit TSTF request.	
CC Response					
2	L.3		CTS 3.1.1.1 is applicable in MODES 1, 2, 3, and 4. ITS 3.1.2 for the reactivity balance is applicable in MODE 1. The justification for the change in the MODE applicability between the ITS and the STS is based on TSTF-141.	Acceptance of this change is contingent upon NRC approval of generic change TSTF-141.	
CC Response					

CCNPP ITS 3.1.2 REACTIVITY BALANCE

3.1.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	M.1		CTS 3.1.1.1 does not contain any requirement when Actions are not completed within the required time. Therefore ITS 3.0.3 is entered which requires entry into MODE 3 within 7 hours. ITS 3.1.2 requires entry into MODE 2 within 6 hours. STS 3.1.3 requires entry into MODE 3 within 6 hours whenever the required Action and associated completion time are not met. The justification for the change in final Definition of the final MODE 2 designation is cited in the ITS markup as being TSTF-141. Also, the final ITS requirement of entering MODE 2 within 6 hours rather than MODE 3 in 6 hours does not satisfy the definition of being More Restrictive, but rather Less Restrictive.	Acceptance of this change is contingent upon NRC approval of generic change TSTF-141. Change is less restrictive.	
CC Response					

CCNPP ITS 3.1.3 MODERATOR TEMPERATURE COEFFICIENT

3.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.1		CTS 4.1.1.4.1 requires that the determination of the MTC is within its limits with confirmatory measurements. These extrapolated confirmatory measured values are to permit direct comparison with the MTC limits. These requirement are procedural in nature. The ITS does not include these procedural requirements. The procedural requirements are moved to plant procedures controlled under the Calvert Cliffs procedural control process. However, the specific procedure and associated controls are not identified.	Provide specific plant procedure where the requirement is located and a discussion of the regulatory controls provided.	
CC Response					
2	None		CTS 4.1.1.4.2.a requires a MTC determination prior to initial operations above 5% RTP, after each fuel loading. ITS SR 3.1.3.1 requires that the MTC is verified within the upper limits specified in Figure 3.1.3-1 prior to entering MODE 1 after each fuel loading. In addition ITS SR 3.1.3.1 has a Note that specifies the Surveillance is not required prior to entry into MODE 2, consistent with the STS. This NOTE is not identified in the marked-up CTS.	Provide the justification for adding the NOTE to the SR.	
CC Response					

CCNPP ITS 3.1.3 MODERATOR TEMPERATURE COEFFICIENT

3.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	A.3		CTS 4.1.1.4.2.b and c requires the determination of the MTC: 1) when above 90% RTP within 7 EFPD of reaching equilibrium at or above 90% RTP; and 2) within 7 EFPD of reaching equilibrium boron concentration of 300 ppm. ITS SR 3.1.3.2 require the MTC determined at: 1) within 7 EFPD of reaching 40 EFPD core burnup; and 2) within 7 EFPD of reaching 2/3 of expected core burnup. STS SR 3.1.3.2 requires a MTC determination within 7 EFPD of reaching 40 EFPD core burnup is changed with a generic change, CEOG-82, to require a MTC determination prior to reaching 47 EFPD.	Acceptance of this change is contingent upon NRC approval of generic change CEOG-82.	
CC Response					
4		JFD 8	CTS 4.1.1.4.2.a requires the determination of the MTC prior to initial operation above 5% RTP after each fuel loading. ITS SR 3.1.3.1 requires verification of the MTC is within the upper limits specified by Figure 3.1.3-1. STS 3.1.4.1 requires the verification of the MTC is within the upper limits specified by COLR. The justification for the change from the STS to the ITS is with generic change CEOG-75.	Acceptance of this change is contingent upon NRC approval of generic change CEOG-75.	
CC Response					

CCNPP ITS 3.1.4 CONTROL ELEMENT ASSEMBLY ALIGNMENT

3.1.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	-		CTS 3.1.3.1.e allows continued operation with one CEA misaligned less than 15 inches if the alignment is restored in one hour. ITS 3.1.4 allows one or more CEAs trippable and misaligned less than 15 inches or one trippable CEA misaligned greater than 15 inches. For either of these conditions, the power is to be reduced to less than or equal to 70% RTP within 2 hours and restore the CEA alignment within 2 hours. The STS 3.1.5 Action A requires the power reduced to less than or equal to 70% RTP within 1 hour. The justification for the completion time is generic change CEOG-114.	Acceptance of this change is contingent upon NRC approval of generic change CEOG-114.	
CC Response					
2	L		CTS 3.1.3.1.i requires that with one or more CEAs misaligned by 15 inches or more from the others in the group, be in HOT STANDBY in 6 hours. ITS 3.1.4 Action D requires two or more CEAs misaligned by greater than 15 inches to be in MODE 3 within 6 hours. This is consistent with STS 3.1.5. The CTS requirements are more restrictive than those cited in the ITS or STS. A discussion of the justification for the less stringent requirements is required.	Provide the justification for the less stringent requirement of requiring two or more of the CEAs misaligned greater than 15 inches. The CTS 3.1.3.1.i requires being in MODE 3 with two or more misaligned greater than 7.5 inches and one or more of the CEAs misaligned greater than 15 inches.	
CC Response					

CCNPP ITS 3.1.4 CONTROL ELEMENT ASSEMBLY ALIGNMENT

3.1.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	M.6		CTS 4.1.3.1.1 requires determining the position to be within 7.5 inches of the other CEAs in the group at least once every 12 hours. ITS SR 3.1.4.1 requires verifying the position of the CEAs are within 7.5 inches of the other CEAs in the group within 1 hour following any CEA movement of greater than 7.5 inches AND every 12 hours thereafter. The STS SR 3.1.5.1 requires the frequency of 12 for the same surveillance. The justification for the ITS SR 3.1.3.1 change is generic change CEOG-107.	Acceptance of this change is contingent upon NRC approval of generic change CEOG-107.	
CC Response					
4	L.6		CTS 4.1.3.1.3 requires the CEA Motion Inhibit demonstrated OPERABLE at least once per 31 days. ITS SR 3.1.4.2 requires verification of the CEA motion inhibit is OPERABLE every 92 days. The STS SR 3.1.5.5 require the same every 31 days. The justification for the ITS SR 3.1.4.2 change in frequency is generic change TSTF-127.	Acceptance of this change is contingent upon NRC approval of generic change TSTF-127.	
CC Response					
5	M.4		New item - CTS None. ITS 3.1.4.3 requires verification of the CEA deviation circuit is OPERABLE every 92 days. STS 3.1.5.4 requires the same surveillance every 31 days. The justification for the frequency change is generic change TSTF-127.	Acceptance of this change is contingent upon NRC approval of generic change TSTF-127.	
CC Response					

CCNPP ITS 3.1.4 CONTROL ELEMENT ASSEMBLY ALIGNMENT

3.1.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
6	L.3		CTS 3.1.3.1.f with one CEA misaligned in a group more than 15 inches, operations may continue provided the misaligned CEA is restored to within the required alignment, immediately implement the reduced power requirements of Action g. Action g implements a completion time of one hour ITS 3.1.4 Action A.2 requires a reduction in the RTP to less than or equal to 70% within 2 hours. STS 3.1.3 Action A.1 requires the reduction in power to less than or equal to 70% in 1 hour. The justification for the change is CEOG-114.	Acceptance of this change is contingent upon NRC approval of generic change CEOG-114.	
CC Response					

CCNPP ITS 3.1.4 CONTROL ELEMENT ASSEMBLY ALIGNMENT

3.1.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
7			Several items in the STS are deleted from the ITS due to generic changes. These items include: STS 3.1.5 Action A.2.1 & .2 for one or more regulating CEA misaligned between 7.5 and 15 inches or one CEA greater than 15 inches requiring verification the SDM is less than or equal to 4.5% delta k/k in one hour OR initiate boration in 1 hour to restore SDM (TSTF-67); STS 3.1.5 Action A.3.2 for one or more regulating CEA misaligned between 7.5 and 15 inches or one CEA greater than 15 inches requiring the alignment of the remainder of the CEAs in the group to within 7 inches of the misaligned CEAs while maintaining insertion limit within 2 hours (TSTF-143); STS 3.1.5 Action B.1, .2, &.3 for one or more shutdown CEA misaligned between 7.5 and 15 inches or one CEA greater than 15 inches requiring reduce RTP to less than 70%, AND verify SDM greater than or equal to 4.5% delta k/k, OR initiate boration, all within 1 hour, AND restore misaligned CEAs to within 7 inches within 2 hours (TSTF-143); STS SR 3.1.5.2 to verify the for each of the CEAs the indication is within 5 inches every 12 hours (CEOG-107). The CTS requirements associated with these deleted sections were either covered in other section of the ITS or were not required by the CTS.	Acceptance of this change is contingent upon NRC approval of generic change TSTF-67, TSTF-143, and CEOG-107.	
CC Response					

CCNPP ITS 3.1.4 CONTROL ELEMENT ASSEMBLY ALIGNMENT

3.1.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
8	L.2 M.5		CTS 3.1.3.1 Action g requires Thermal Power to be reduced to less than (50%) or (75% of the Thermal Power level prior to the misalignment if above 50% RTP). ITS 3.1.4 requires the power to be reduced to less than 70% RTP. The justification provided for the change is that there is reasonable assurance that acceptable power distributions are maintained for all conditions when the power is less than 70% RTP.	What is a "reasonable assurance?" Provide the justification for the conclusion that acceptable power distributions are maintained for a power limit of less than 70% RTP for all misaligned CEA conditions that are allowed.	
CC Response					
9	L.3		CTS 3.1.3.1 Action f allows operation to continue in MODE 1 and 2 with one CEA misaligned greater than 15 inches within the time determined by the full core power distribution monitoring system or if this system is unavailable from the allowable time provided in COLR. CTS 3.1.4 Action A allows 2 hours to restore the CEA misalignment but does not define the restrictions that are imposed on the allowable operating time. The restrictions imposed in the CTS 3.1.3.1 need to be included in the Bases and in procedures.	Update the Bases and procedures.	
CC Response					
10	L.4		CTS 4.1.3.1.2 requires each CEA that is not fully inserted is exercised at least once per 31 days. ITS SR 3.1.4.5 requires the exercising of the CEAs once per 92 days. The STS SR 3.1.5.4 require the every 92 days.	Acceptance of this change is contingent upon NRC approval of the extension of the surveillance interval.	
CC Response					

CCNPP ITS 3.1.4 CONTROL ELEMENT ASSEMBLY ALIGNMENT

3.1.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
11		JFD 6	SR 3.1.4.5 Frequency is being from 18 to 24 months to coincide with the change in refueling cycle, per GL 91-04.	Under NRC review.	
CC Response					
12	L.1		CTS 3.1.3.1 Action e. allows one CEA (regulating or shutdown) misaligned from the other CEA in its group by less than 15 inches. Operation may continue in MODE 1 or 2 provided the misaligned CEA is restored in one hour. ITS 3.1.4 Action A allows one or more CEAs misaligned from its group by greater than 7.5 inches and less than or equal to 15 inches requires restoration in 2 hours. The bases for allowing more than one misaligned CEA and the CT change are not provided.	The justifications for allowing more than one CEA to be misaligned is required and the CT change from 1 to 2 hours. Note: The allowance of more than one misaligned CEA is consistent with the STS.	
CC Response					

CCNPP ITS 3.1.5 SHUTDOWN CONTROL ELEMENT ASSEMBLY INSERTION LIMIT

3.1.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L.2 & L.3		CTS 3.1.3.1.i. requires that with more than one CEA misaligned more than 7.5 inches or any one CEA misaligned more than 15 inches from any other CEA in the group, enter into HOT SHUTDOWN within 6 hours. ITS 3.1.5 Action requires: verification of the times the CEAs are within 121.5 and 129.0 inches; restoration of the misaligned CEAs based on accumulated time out of specification, one misaligned CEA less than 121.5 inches; or two or more CEA not within limits; restore the CEAs to within limits in 2 hours. If this is not possible, enter into MODE 3 within 6 hours. The ITS allows 2 hours to correct the misalignment, this is an extension of the allowable outage time.	Acceptance of this change is contingent upon NRC approval of CEOG-114. Note: The ITS AOT is consistent with the STS.	
CC Response					

CCNPP ITS 3.1.5 SHUTDOWN CONTROL ELEMENT ASSEMBLY INSERTION LIMIT

3.1.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	-		CTS 3.1.3.5 Action requires with one or more SHUTDOWN CEAs withdrawn to less than 129.0 inches consider the CEAs misaligned and immediately apply specification 3.1.3.1 Actions e, f, h, or i as appropriate. ITS 3.1.5 Action has three Actions requiring: verification of the times the CEAs are within 121.5 and 129.0 inches; restoration of the misaligned CEAs based on accumulated time out of specification, one misaligned CEA less than 121.5 inches; or two or more CEA not within limits; restore the CEAs to within limits in 2 hours. If this is not possible, enter into MODE 3 within 6 hours. The STS 3.1.6 Action A requires with one or more SHUTDOWN CEAs not within limits, verify the SDM delta k/k, or initiate boration to restore the SDM, and restore SHUTDOWN CEAs to within limits. The STS 3.1.6 Action to verify the delta k/k SDM and initiate boration is deleted from the STS by Generic change TSTF-67.	Acceptance of this change to the STS is contingent upon NRC approval of generic change TSTF-67.	
CC Response					

CCNPP ITS 3.1.5 SHUTDOWN CONTROL ELEMENT ASSEMBLY INSERTION LIMIT

3.1.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3		JFD 7 JFD 9 JFD 10	CTS 3.1.3.5 Action requires that with one or more CEA misaligned, follow the Actions identified in CTS 3.1.3.1 Actions e, f, h, or i. Action g is referenced by the Action cited above. These Actions require for the respective Action items: h) more than one CEA misaligned and each misaligned CEA is within 15 inches of any other CEA, restore within one hour or be in HOT STANDBY within 6 hours; i) with more than one CEA misaligned and any one or more than one CEA misaligned CEAs is more than 15 inches from any CEA in the group, be in HOT STANDBY within 6 hours; g) allows continued POWER OPERATION for misaligned CEAs within 7.5 inches of the CEA group for 7 days per occurrence with a total accumulated time of greater than 14 days per calendar year. ITS 3.1.5 Action has three Actions requiring: verification of the times the CEAs are within 121.5 and 129.0 inches; restoration of the misaligned CEAs based on accumulated time out of specification, one misaligned CEA less than 121.5 inches; or two or more CEA not within limits; restore the CEAs to within limits in 2 hours. If this is not possible, enter into MODE 3 within 6 hours.	There are several differences between the STS and ITS 3.1.5 that need to be discussed, and they are as follows: 1) The change in MODE 2 definition; 2) The inclusion of time limits in the CONDITION Statements; and, 3) The 2 hour restoration time for one or more severely misaligned CEAs.	
CC Response					

CCNPP ITS 3.1.6 REGULATING CEA INSERTION LIMITS

3.1.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.2		CTS 3.1.3.1 Action c. and g. allow the insertion of one CEA beyond the long-term steady state insertion limit for up to 7 days per occurrence and up to 14 days per 365 days. This is allowed only if the remainder of the group is inserted within 7.5 inches of the out-of-alignment CEA. ITS does not limit the amount of time that a CEA is inserted beyond the long-term steady state limit, other than the alignment limits of ITS 3.1.6. However, the ITS and the CTS limit the time the group is inserted within the steady-state insertion limits to 5 EFPD per 30 EFPD, and 14 EFPD per 365 EFPD. In most cases, the CTS limit is less restrictive, however, the PDIL limits are required to be adhered to. The CTS long-term steady-state insertion limits are moved to plant procedures. This information is controlled under the Calvert Cliffs procedure control process.	1) Provide the justification and rationale used to determine when the PDIL limits are the most limiting. Also describe the other time limit requirements if the other limits are more limiting. 2) Provide specific plant procedures where the requirements are located and provide a discussion of how the regulatory change controls on these requirements are met.	
CC Response					

CCNPP ITS 3.1.7 SPECIAL TEST EXCEPTION (STE) - SHUTDOWN MARGIN (SDM)

3.1.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.1		CTS 3.10.1.a. Action requires with the CEA not fully inserted and less than required reactivity equivalent available for trip insertion, immediately initiate and continue boration until the Shutdown margin is restored. ITS 3.1.7 Action A requires the initiation of the Action to restore trippable CEA worth within 15 minutes. STS 3.1.8 required initiation of boration to restore Shutdown reactivity within 15 minutes. CTS 3.10.1.b. Action requires that with all CEAs inserted and the reactor subcritical by less than the above reactivity equivalent, immediately initiate boration until SHUTDOWN MARGIN in CTS 3.1.1.1.1 is restored. ITS 3.1.7 Action A (option) requires that all CEAs inserted and reactor subcritical by less than the above SHUTDOWN reactivity equivalent, initiate Action to restore trippable CEA worth within 15 minutes. The CTS Action b. has been completely marked for the markup for the ITS. The change is attributed to generic change CEOG-111.	Acceptance of this change is contingent upon NRC approval of generic change CEOG-111 [TSTF-67].	
CC Response					

CCNPP ITS 3.1.7 SPECIAL TEST EXCEPTION (STE) - SHUTDOWN MARGIN (SDM)

3.1.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	LA.1		CTS 3.10.1.b. Action requires that, with all full length CEAs inserted and the reactor subcritical by less than the required amount, initiate boration and continue at greater than 40 gpm of 2300 ppm until SDM is restored. ITS 3.1.7 requires the initiation of action to restore the trippable CEA worth. These actions are adequately defined and controlled by plant procedures and as such are being deleted from the ITS. However, the specific procedures are not identified. There is no discussion of how the Calvert Cliffs procedure control process meets the regulatory control requirements.	Provide specific plant procedure where the requirement is located and a discussion of the regulatory controls provided.	
CC Response					
3	LA.1		CTS 4.10.1.1 requires demonstrating each CEA not fully inserted is capable of full insertion from at least 50% withdrawn 7 days prior to reducing the SDM below its limit. ITS 3.1.7.2 requires the same, however, it is modified by a note to waive the CEA drop time test requirement during initial power escalation if SR 3.1.4.6 has been performed. The bases for this added note is that of generic change TSTF-134.	Acceptance of this change is contingent upon NRC approval of generic change TSTF-134.	
CC Response					

CCNPP ITS 3.1.8 SPECIAL TEST EXEMPTIONS - MODES 1 & 2

3.1.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1			TSTF-67 removes SDM requirement from LCO.	Acceptance of this change is contingent upon NRC approval of generic change TSTF-67; review this specific portion of TSTF-67 for acceptability. With insertion limit TS suspended, should a SDM (or similar) requirement remain?	
CC Response					

CCNPP ITS 3.1 RELOCATED SPECIFICATIONS

3.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			No Comments		

CCNPP ITS 3.2.1 LINEAR HEAT RATE

3.2.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		JFD 6	SR added to verify value of F^{T}_{xy}. Addition to STS.	Evaluate for generic applicability, and submit TSTF change to revise STS if found to be generic.	
CC Response					
2	A.5		CTS Surveillance Requirernent 4.2.1.3.a is deleted by this change. The discussion of change indicates that this surveillance is "duplicative of ITS 3.1.6 and future revisions to this information will be controlled under the Calvert Cliffs procedure control process." It is not clear that any portion of the CTS 4.2.2.1.2.d Surveillance Requirement is not maintained by ITS 3.1.6 SRs. Therefore, the discussion regarding requirements outside the ITS being controlled by Calvert Cliffs procedure control process is an error.	Provide additional justification and discussion on what CTS requirements are contained outside the ITS and controlled by the Calvert Cliffs procedure control process, if any.	
CC Response					

CCNPP ITS 3.2.2 TOTAL PLANAR RADIAL PEAKING FACTOR

3.2.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		JFD 4	Addition to SR 3.2.2.1 Note allowing Total Planar Radial Peaking Factor using incore detectors to obtain power distribution map limited to core planes between 15% and 85% of full core height.	Evaluate Note addition for generic applicability, and submit a TSTF change to the STS if found generic.	
2	LA.1		CTS 3.2.2.1 Action a requires the withdrawal of CEAs at or beyond the long-term steady state insertion limit, and a power reduction to bring the combination of Thermal Power and Total Planar Radial Peaking Factor with the limits provided in the COLR or the reduction in Thermal Power to less than or equal to the limit established by the full core power distribution monitoring system as a function of Total Planar Radial Peaking Factor when the Total Planar Radial Peaking Factor is outside the limits provided in the COLR. These specifics on how to restore the Total Planar Radial Peaking Factor provided by the CTS are moved to plant procedures. The discussion of change does not include what procedures these details are moved to or the procedure change control process in place. This change is consistent with Generic Change CEOG-110 to the STS.	Provide discussion on which procedure will contain these details as well as the applicable procedure change control process. Approval of this change is contingent on NRC approval of CEOG-110.	
CC Response					

CCNPP ITS 3.2.3 TOTAL INTEGRATED RADIAL PEAKING FACTOR

3.2.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.1		CTS 3.2.3 ACTION b requires the withdrawal of CEAs at or beyond the long-term steady state insertion limit, and a power reduction to bring the combination of Thermal Power and Total Integrated Radial Peaking Factor within the limits provided in the COLR and maintain the peripheral axial shape index with the DNB flux offset control limits provided in the COLR, or the reduction in Thermal Power to less than or equal to the limit established by the full core power distribution monitoring system, as a function of Total Integrated Radial Peaking Factor when the Total Integrated Radial Peaking Factor is outside the limits provided in the COLR. These specifics on how to restore the Total Integrated Radial Peaking Factor provided by the CTS are moved to plant procedures. The discussion of change contains no details on which procedure contains these requirements or the change control process in place. This change is consistent with Generic Change CEOG-110 to the STS.	Provide discussion on which procedure will contain these details as well as the applicable procedure change control process. Approval of this change is contingent on NRC approval of CEOG-110.	
CC Response					

CCNPP ITS 3.2.4 AZIMUTHAL POWER TILT

3.2.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L.1 A.5	JFD 7	CTS 3.2.4 Action b requires Tq to be restored to within limits in 2 hours or reduce power to ≤20% RTP. The ITS requires restoring Tq to within limits in 4 hours or reducing power to ≤50%RTP within the next 4 hours. The STS allows 2 hours to restore Tq and 4 hours to reduce power. Adequate justification is not provided for this "out-of-scope" change (the ITS is less restrictive than both the CTS and STS).	Either adopt the STS Completion Times of provide adequate justification for the less restrictive ITS Completion Times.	
CC Response					
2	LA.1		CTS Surveillance Requirement 4.2.4.2.b requires the determination of Azimuthal Power Tilt using the incore detectors at least once per 12 hours when one excore channel is inoperable and Thermal Power is > 75% RTP. This requirement is moved to plant procedures. The discussion of change contains no information on which procedure contains this information or the details of the applicable procedure control process.	Provide discussion on which procedure contains this information and the applicable procedure control process.	
CC Response					

CCNPP ITS 3.2.5 AXIAL SHAPE INDEX

3.2.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
			No Comments.		

CCNPP ITS 3.5.1, SAFETY INJECTION TANKS (SITs)

3.5.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
All			CCNPP relies upon CEOG-87 for many of the changes included in this LCO. Please revise to delete changes resulting from CEOG-87.	Provide changes deleting CEOG-87 based changes.	
CCNPP Response:					
1	LA.2		CTS Surveillance Requirement 4.5.1.f specifies the sample location for verifying boron concentration as "HPSI pump discharge." ITS SR 3.5.1.4 requires verifying boron concentration but does not specify the sample location. This detail is moved to plant procedures. However, the specific procedure and associated controls are not identified.	Provide specific plant procedure where the requirement is located and a discussion of the regulatory controls provided.	
CCNPP Response:					
3	L.1		STS 3.5.1 Action A requires restoration of boron concentration to within limits within 72 hours for the condition of one inoperable SIT, due to boron concentration outside limits. ITS 3.5.1 Action A requires restoration of the SIT to OPERABLE status and adds "inability to verify level or pressure" to this condition. The added inability to verify level or pressure to the Condition and the changed Requirement to restore the SIT to OPERABLE status results in a deviation from the STS based on generic change CEOG-87.	**BEYOND SCOPE** Acceptance of this change is contingent upon NRC approval of generic change CEOG-87.	
CCNPP Response:					

CCNPP ITS 3.5.1, SAFETY INJECTION TANKS (SITs)

3.5.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4	L.2		CTS 3.5.1 requires the restoration of the SIT to operable status within one hour with one tank inoperable. The STS requires the return to operable status within one hour if the one SIT is inoperable for reasons other than boron concentration not within limits. The ITS 3.5.1 Actions has increased the completion time from one hour to 24 hours based on generic change TSTF-59.	**TSTF AWAITING COMMISSION ACTION** Acceptance of this change is contingent upon NRC approval of generic change TSTF-59.	
CCNPP Response:					
5	L.3		CTS 3.5.1 requires that the isolation valve to be opened immediately when one SIT is inoperable. The STS requires the return to operable status within one hour if the one SIT is inoperable for reasons other than boron concentration not within limits. The ITS 3.5.1 Actions has increased the completion time for returning to operable status to 24 hours based on generic change TSTF-59.	**TSTF AWAITING COMMISSION ACTION** Acceptance of this change is contingent upon NRC approval of generic change TSTF-59.	
CCNPP Response:					
6	LA.1		CTS Surveillance Requirement 4.5.1.c specifies power is removed to the isolation valve operator by maintaining the feeder breaker open under administrative control. ITS SR 3.5.1.5 requires verifying power is removed from each isolation valve operator but does not specify the feeder breaker being open by administrative controls. This detail is moved to plant procedures. However, the specific procedure and associated controls are not identified.	Provide specific plant procedure where the requirement is located and a discussion of the regulatory controls provided.	

CCNPP ITS 3.5.1, SAFETY INJECTION TANKS (SITs)

3.5.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
CCNPP Response:					
7	L.6		CTS Surveillance Requirement 4.5.1.e requires a verification of the opening of the SIT isolation valves whenever the pressure is greater than 300 psia and upon receipt of a SIT signal. This requirement is deleted from the ITS 3.5.1 Surveillance Requirements. There is no justification presented that these automatic functions are not required or are being tested in another section.	Provide the justification for the deletion of this test requirement or a reference to another section that would satisfy the testing function.	
CCNPP Response:					
8	A.3		CTS 3.5.1 Actions a and b are based on the position of the isolation valve. The ITS Actions are not based on the isolation valve position. There is no justification or basis provided for not including the isolation valve position.	**IS THIS ALSO BASED, IN PART ON CEOG-87?** Provide the justification and basis for not basing the Actions on the position of the isolation valve.	
CCNPP Response:					
11	L.1		CTS 3.5.1 does not have an Action based on the inoperability due to boron concentration not being within limits or the inability to verify the pressure and level in the SIT. ITS 3.5.1 Action A incorporates these condition requirements to require the restoration of the SIT to OPERABLE status within 72 hours. The basis for these requirements is generic change CEOG-87.	Acceptance of this change is contingent upon NRC approval of generic change CEOG-87.	
CCNPP Response:					

CCNPP ITS 3.5.2 ECCS - OPERATING

3.5.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L.1		CTS 3.5.2 requires that with one or more ECCS subsystems inoperable that the subsystems should be returned to operable status within 72 hours. The proposed Action A extends this completion time to return the subsystem to operable status to within 7 days for the LPIS subsystem only. ITS 3.5.2 Action A proposes the same requirement for the LPIS to be returned to operable status be added to the STS. The STS does not have a specific action statement for the LPIS subsystem. The basis for changing the STS is the generic change TSTF-58.	**COMMENT SAME AS 3.5.1** Acceptance of this change is contingent upon NRC approval of generic change TSTF-58.	
CCNPP Response:					
2	LA.4		CTS Surveillance Requirement 4.5.2 specifies in a footnote, that whenever flow testing into the RCS is required at RCS temperatures of 365°F and less, the high pressure safety injection pump shall recirculate RCS water. This requirement is used to demonstrate operability of the ECCS subsystems. ITS SRs do not contain this requirement. This detail is moved to plant procedures. However, the specific procedure and associated controls are not identified.	Provide specific plant procedure where the requirement is located and a discussion of the regulatory controls provided.	
CCNPP Response:					

3.5.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	LA.5		CTS Surveillance Requirement 4.5.2.e.1 specifies that verification of the open-permissive prevents the Shutdown Cooling System suction isolation valves from being opened at RCS pressure of greater than 309 psia. ITS Srs do not contain this requirement. This detail is moved to plant procedures. However, the specific procedure and associated controls are not identified.	Provide specific plant procedure where the requirement is located and a discussion of the regulatory controls provided.	
CCNPP Response:					
4	LA.6		CTS Surveillance Requirement 4.5.2.h.1 specifies that verification of HPSI flow rates shall be greater than 470 gpm for the sum of the three lowest flow legs following completion of HPSI modifications. ITS Srs do not contain this requirement. This detail is moved to plant procedures. However, the specific procedure and associated controls are not identified.	Provide specific plant procedure where the requirement is located and a discussion of the regulatory controls provided.	
CCNPP Response:					
5	None		CTS Surveillance Requirement 4.5.2.b.1 provides a surveillance requirement for verifying the containment isolation valve opens upon a Recirculation Actuation Test Signal every 31 days. This requirement is moved to ITS SR 3.3.4 with a surveillance interval of 92 days. No justification is provided for the change in frequency of the surveillance interval.	**BEYOND SCOPE** **MAKE SURE THAT THIS IS COVERED IN 3.3.4.**	
CCNPP Response:					

3.5.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
6	A.5, A.7		CTS Surveillance Requirement 4.1.2.8 has been revised to require that each of the charging pumps develops a flow of greater than 37 gpm in accordance with the Inservice Testing Program. ITS 3.5.2.4 now contains the surveillance requirement. A qualifying note is added to the STS to only require the performance of the surveillance when greater than 80% reactor power. No justification is provided to support the added qualifying note. This change is a deviation from the STS requirements.	Provide the justification for the qualifying note added to the surveillance requirement limiting the surveillance to when the reactor power is greater than 80%, based on system design, current licensing basis or operational constraints. STS requires this at all times.	
CCNPP Response:					
7	LA.3		CTS Surveillance Requirement 4.5.2.c requires that a visual inspection of the containment be performed to verify that no debris could be transported to the containment sump resulting in plugging the pump suction during a LOCA. ITS Srs do not contain this requirement. This detail is moved to plant procedures. However, the specific procedure and associated controls are not identified.	Provide specific plant procedure where the requirement is located and a discussion of the regulatory controls provided.	
CCNPP Response:					
8	LA.7		CTS Surveillance Requirement 4.5.2.h specifies that verification of the head of the HPIS pumps be determined during the recirculation flow test to the refueling water tank. ITS Srs do not contain this requirement. This detail is moved to plant procedures. However, the specific procedure and associated controls are not identified.	Provide specific plant procedure where the requirement is located and a discussion of the regulatory controls provided.	

CCNPP ITS 3.5.2 ECCS - OPERATING

3.5.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
CCNPP Response:					

CCNPP ITS 3.5.3 EMERGENCY CORE COOLING SYSTEM (ECCS) - SHUTDOWN

3.5.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.2		The CTS 3.5.3 requirement to place the HPIS control switch in the pull-to-lock position at or below 365°F is moved to plant procedures. The specific plant procedures and associated regulatory controls are not identified.	Provide specific plant procedure where the requirement is located and a discussion of the regulatory controls provided.	
CCNPP Response:					

CCNPP ITS 3.5.4 REFUELING WATER TANKS (RWT)

3.5.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
No comments					

CCNPP ITS 3.5.5 TRISODIUM PHOSPHATE

3.5.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.2		CTS 3.5.2 Surveillance Requirements contain testing requirements for the Trisodium Phosphate (TSP). ITS 3.5.5 is created to address TSP that elevates the requirements to an LCO rather than just a Surveillance Requirement. This is considered as a more restrictive change.	Change the designation of this change from an Administrative to a More Restrictive designation.	
CCNPP Response:					
2	L.1		The CTS 3.5.2 and 3.5.3 Trisodium Phosphate (TSP) Surveillance Requirements are Applicable in MODES 3 when plant pressure is equal to or greater than 1750 psia and in MODE 4. ITS 3.5.5 changes the Applicability to MODES 1, 2, and 3, deleting MODE 4 Applicability. It is not clear that the TSP inventory is not assumed in the plant accident analysis for MODE 4 Conditions.	Provide additional discussion and justification for deleting the MODE 4 Applicability based on Safety Analysis assumptions.	
CCNPP Response:					

CCNPP ITS 3.9.1 REFUELING OPERATIONS - BORON CONCENTRATION
Table 3.9.1 Rev.1 May 9, 1997

3.9.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	JFD1		Terms in the ITS LCO for the volumes flooded with borated water during refueling operations are not consistently applied in the Bases.	Evaluate the Bases for inconsistent application of TS LCO terms and revise the submittal as necessary.	
CCNPP Comment:					
2	L.2		L.2 relates to deleting CTS SR 4.9.1.1 that specifies the boron concentration is required to be within the limits prior to special cases listed in the SR. The DOC discussion should be revised to state that the ITS Mode 6 requirements bound each case specified in SR 4.9.11. If it does not then additional justification needs to be provided.	Provide the requested additional justification.	
CCNPP Comment:					

CCNPP ITS 3.9.2 REFUELING OPERATIONS - NUCLEAR INSTRUMENTATION
Table 3.9.2 Rev.1 May 9, 1997

3.9.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	none	none	The CTS requirement for two "operating" SRMs is changed to two "operable" SRMs without justification.	Provide a DOC discussion for each proposed change to the CTS.	
CCNPP Response:					
2	M.2		Provide additional M.2 discussion to address changes to the applicabilities in the CTS to ITS translation and use of Core Alterations vice Mode 6 for specified surveillance.	Provide a DOC discussion for each proposed change to the CTS.	
CCNPP Response:					
3	L.1		The DOC states that the CTS SR 4.9.2.a tests only the Rate of Change Power-High RPS trip, yet the SR requries a CFT test of the SRM instrumentation. Explain how plant procedures meet the SRM CFT test requirements by testing the RPS Rate of Change Power- High instrumentation.	Provide additional explanation.	
CCNPP Response:					

CCNPP ITS 3.9.3 REFUELING OPERATIONS - CONTAINMENT PENETRATIONS
Table 3.9.3 Rv.1 May 9, 1997

3.9.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.7		CEOG-115 (TSTF-197) is incorporated in the ITS. CTS 3.9.4 is applicable for penetrations that provide direct access from the containment atmosphere to the "outside atmosphere." ITS 3.9.3.c is applicable for penetrations that provide direct access from the containment atmosphere to "the environment."	Withold accepting this change pending staff review and approval of CEOG-115.	
CCNPP Response:					
2		2	STS 3.9.3.c.2 requires the containment penetrations capable of being closed by an Operable Containment Purge and Exhaust Isolation System. ITS 3.9.3.c.2 requires closure capability from a Containment Radiation Signal (CRS). The equivalency of Operable Containment Purge and Exhaust Isolation System and Containment Radiation Signal (CRS) is unclear.	Provide justification for the STS deviation based on current licensing bases, system design, or operational constraints.	
CCNPP Response:					
3	LA.1		CTS 3.9.4.c.1-4 stipulates actions taken when both containment Personnel Airlock Doors are open. These requirements are moved to ITS 3.9.3 Bases and plant procedures. The proposed change results in the elimination of CTS limiting conditions for operation, as such the use of a less restrictive relocation of TS detail justification is not acceptable. Each proposed change to CTS limits requires a safety basis discussion.	Provide additional less restrictive change discussion including specific safety basis discussion for the CTS requirements and explain why the deletion will not result in a significant safety question in the operation of the plant.	
CCNPP Response:					

CCNPP ITS 3.9.3 REFUELING OPERATIONS - CONTAINMENT PENETRATIONS
Table 3.9.3 Rv.1 May 9, 1997

3.9.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4	L.2 L.5		CTS SR 4.9.4.b and 4.9.14 require verifying the penetrations are in their required condition, or capable of being closed by an Operable containment purge valve (4.9.4.b only) within 72 hours prior to the start of and at least once per 7 days during Core Alterations and movement of irradiated fuel in containment. ITS SR 3.9.3.1 does not retain the 72 hour requirement. This extends the CTS STI from < 72 hours to < 7 days.	These L justifications require additional discussion of the safety basis for the proposed extension in order to adopt the ITS Surveillance Test Interval.	
CCNPP Response:					
5	L.3	10	CTS SR 4.9.9 requires verifying the containment purge isolation valves isolate to their correct position on an actuation signal within 72 hours prior to the start of Core Alterations and at least every 7 days thereafter. ITS SR 3.9.3.2 requires this verification each refueling outage prior to the start of Core Alterations or movement of irradiated fuel assemblies within the containment, but deletes the 72 hour CTS STI. This extends the CTS STI from < 72 hours to once per refueling outage.	This L justification requires additional discussion of the safety basis for the proposed extension in order to adopt the ITS Surveillance Test Interval.	
CCNPP Response:					

3.9.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
6 OOS	L.4		CTS SR 4.9.9 requires verifying the containment purge supply and exhaust isolation system capable of isolating on an actuation signal once per 7 days during refueling. ITS SR 3.9.3.2 requires performing the test once each refueling outage prior to starting Core Alterations or movement of irradiated fuel assemblies within the containment, but deletes the 7 day STI. This extends the CTS STI from every 7 days to once per refueling outage.	This L justification requires additional discussion of the safety basis which includes instrument loop and actuated device reliability in order to adopt the proposed extension from 7 days to once per refueling interval.	
CCNPP Response:					
7	A.3	2	CTS 3.9.9 includes Operability and Action requirements for the Containment Purge Valve Isolation system during refueling. With the Containment Purge Valve Isolation inoperable, the requirements specify closing each penetration providing access from the containment atmosphere to the outside atmosphere. The CTS 3.9.9 requirements are moved to ITS 3.9.3. ITS 3.9.3 replaces the CTS requirement for the Containment Purge Valve Isolation System with the Containment Radiation Signal.	Provide discussion and justification for deleting Containment Purge Valve Isolation System Actions from CTS 3.9.9.	
CCNPP Response:					

CCNPP ITS 3.9.3 REFUELING OPERATIONS - CONTAINMENT PENETRATIONS
Table 3.9.3 Rv.1 May 9, 1997

3.9.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
8 OOS	A.3		CTS 3.9.14 requires that the Containment Vent Isolation Valves are closed during Core Alterations or movement of irradiated fuel assemblies in containment. The CTS markup indicates the requirements are moved to ITS 3.9.3. Discussion A.3 is provided for moving CTS 3.9.4 and CTS 3.9.9 but the discussion does not include moving CTS 3.9.14.	Provide discussion and justification for the disposition of CTS 3.9.14, Containment Vent Isolation Valves.	
CCNPP Response:					
9	L.5		CTS 3.9.14 provides requirements and actions for the Containment Vent Isolation Valves during refueling operations. CTS 4.9.14 requires verification that Containment Vent Isolation Valves are in the closed position 72 hours prior to the start of and at least every 7 days during Core Alterations. DOC L.5 discusses verifying that the valves actuate to their correct position on an actuation signal. DOC L.5 also discusses a Purge and Exhaust valve SR in ITS 3.9.3.2 which requires the Purge and Exhaust valves to actuate. It is unclear what changes to what systems L.5 is discussing.	Provide a revised discussion and justification for the desired CTS requirements changes.	
CCNPP Response:					

CCNPP ITS 3.9.3 REFUELING OPERATIONS - CONTAINMENT PENETRATIONS
Table 3.9.3 Rv.1 May 9, 1997

3.9.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
10	L.5		CTS 3.9.14 requires the Containment Vent Isolation valves closed during Core Alterations or irradiated fuel movement in containment. With one or more vent isolation valves open, CTS 3.9.14 Action requires closing the valve within one hour or suspending all operations involving Core Alterations or movement of irradiated fuel in containment. CTS 3.9.14 requirements were moved to ITS 3.9.3. but the requirement to close an open valve within one hour is not part of ITS 3.9.3 Required Action.	Provide discussion and justification for deleting the Containment Vent Isolation Actions from ITS 3.9.3.	
CCNPP Response:					
11	None		CTS 3.9.4.c and ITS 3.9.3.b provide requirements for Containment Airlock Doors. ITS 3.9.3.b adds requirements for the Emergency Airlock that are not contained in CTS 3.9.4.c. This change is based on TSTF-68 rev. 1.	Acceptance of this change is contingent upon staff approval of TSTF-68 rev 1.	
CCNPP Response:					
12		8	The JFD states that CTS requirements allow both Personnel Air Locks open if one door id capable of being closed. This statement is one item in a list of 4 CTS conditions which must be met for both airlock doors to be open. Revise the JFD discussion to include all limiting conditions for operation.	Provide a revised JFD discussion.	
CCNPP Response:					

CCNPP ITS 3.9.3 REFUELING OPERATIONS - CONTAINMENT PENETRATIONS
Table 3.9.3 Rv.1 May 9, 1997

3.9.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
13	LA.2		The DOC discussion justifies relocating details because "this detail does not change the requirement that the Action be performed." Provide a safety basis discussion for the change. The discussion of change should relate that LCO limits are not changed and that the relocated requirements establish a good practice for ensuring reactor operations do not pose a threat to public health and safety.	Provide revised LA.2 discussion.	
CCNPP Response:					
14	LA.3		Specific TS requirements, to verify that the containment purge valve isolates on a manual initiation and high radiation test signal from the containment radiation monitoring instrumentation channels, are deleted. Provide a DOC discussion for the deletions.	Provide DOC discussion for each proposed change.	
CCNPP Response:					
15	A.1		The A.1 DOC is used in CTS SR 4.9.9 to justify the addition of test applicabilities for containment purge valves. The proposed justification is not detailed enough to make a finding that the applicability changes are administrative.	Provide additional DOC discussion.	
CCNPP Response:					

3.9.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
16	A.6		The A.6 DOC is used to justify the deletion of surveillance test requirements specified in ITS SR 3.9.3.2 to verify valves close on test or actual signals if the valve is closed to comply with ITS LCO 3.9.3.c.1; i.e., the staff accepts that valves not included in the TS applicability because they are closed can be controlled under administrative controls. DOC A.6 does not present sufficient justification to make a finding that the SR changes are administrative.	Provide additional justification.	
CCNPP Response:					
17			TSTF-68 Rev.1 is incorporated into the Bases.	Withhold approval pending staff review.	
CCNPP Response:					

CCNPP ITS 3.9.4 REFUELING OPERATIONS - SHUTDOWN COOLING AND COOLANT CIRCULATION - HIGH WATER LEVEL
Table 3.9.4 Rev.1 May 9 1997

3.9.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	M.1		The logical connector "AND" between ITS 3.9.4 Required Action A.1 and A.2 is omitted from ITS 3.9.4 Required Action.	Insert the logical connector in accordance with common usage described in ITS 1.2, Logical Connectors.	
CCNPP Response:					
2	L.1	11	CTS 3.9.8.1 Action a requires with less than one SDC loop in operation that all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere are closed within 4 hours. CTS 3.9.8.1 allows the SDC pumps to be deenergized for local leak rate testing of penetration 41 and maintenance of SDC suction valves. Both of these requirements are changed to "Containment penetrations are in the status described in ITS 3.9.3." This change relaxes two fission product boundaries with only the cladding boundary intact. This change is justified by CEOG-115.	Acceptance of this change is contingent upon NRC approval of CEOG-115.	
CCNPP Response:					

CCNPP ITS 3.9.4 REFUELING OPERATIONS - SHUTDOWN COOLING AND COOLANT CIRCULATION - HIGH WATER LEVEL
Table 3.9.4 Rev.1 May 9 1997

3.9.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	A.6		The statement that CTS 3.9.8.1 applicability includes "operable" is incorrect. Also, the discussion states that splitting CTS LCO 3.9.8.1 requirements (Mode 6, all water levels) into two Mode 6 ITS LCOs (one for > 23 feet and the other for ≤ 23 feet of water) is administrative. When compared to CTS 3.9.8.2 (Mode 6 < 23 feet of water) a determination cannot be made that the change is administrative because the action for these two applicabilities are different and because CTS LCO 3.9.8.2 already exists for the condition of ≤ 21 feet of water.	Provide additional discussion that the proposed changes are administrative.	
CCNPP R nse:					
4	L.3		Current TS requirements allow shutdown cooling to be periodically removed from service during the performance of core alterations in the vicinity of the reactor pressure vessel hot legs. The DOC states the importance of this evolution is to prevent reducing boron concentration. Further, the DOC states that operations such as core mapping, RCS to SDC isolation valve testing etc. will be permitted. Explain how "core alterations in the vicinity of the RPV hot legs" can affect these operations that will now be permitted.	Provide additional justification.	
CCNPP Response:					
5		8	Incorporation of CEOG-85 in Bases	Withhold approval pending staff review.	

CCNPP ITS 3.9.4 REFUELING OPERATIONS - SHUTDOWN COOLING AND COOLANT CIRCULATION - HIGH WATER LEVEL
Table 3.9.4 Rev.1 May 9 1997

3.9.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
CCNPP Response:					
6	Bases		CEOG-115 (TSTF-196) changes to Action A.4 Bases were partially incorporated.	Revise the Bases to incorporate all of CEOG-118. Acceptance of CEOG-118 is pending staff review.	
CCNPP Response:					

CCNPP ITS 3.9.5 REFUELING OPERATIONS - SHUTDOWN COOLING AND COOLANT CIRCULATION - LOW WATER LEVEL
Table 3.9.5 Rev.1 May 9, 1997

3.9.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.6 M.3 L.1 L.2 L.3	5	ITS LCO 3.9.5 requires two SDC loop operable and one in operation in Mode 6 with reactor water level < 23 feet above irradiated fuel. ITS 3.9.5 has essentially the same limits and applicability as CTS 3.9.8.2. Certain limitations and allowances for operation in Mode 6 are proposed to be added to ITS 3.9.5 using requirements from CTS 3.9.8.1. CTS 3.9.8.1 requires one SDC loop to be in operation.	These LCOs do not address the same plant conditions. The changes proposed by these DOCs are rejected. Provide a revised markup of CTS 3.9.8.2 and associated DOCs for adopting NUREG 1432 LCO 3.9.5.	
CCNPP Response:					
2	L.1		CTS 3.9.8.1 Action a requires, with less than one SDC loop in operation, that all containment penetrations providing direct access from the containment atmosphere to the outside atmosphere are closed within 4 hours. ITS 3.9.5 Action B.3 changes these requirements to "Containment penetrations are in the status described in ITS 3.9.3." This change is justified by CEOG-115.	Acceptance of this change is contingent upon NRC approval of CEOG-115.	
CCNPP Response:					
3	A.6		ITS 3.9.5 does not include any Required Actions that restrict altering the decay heat load of the reactor. Water level and Core Alteration restrictions are established in ITS 3.9.6. A.6 is not applicable to ITS 3.9.5.	Delete DOC A.6 discussion and justification.	
CCNPP Response:					

CCNPP ITS 3.9.5 REFUELING OPERATIONS - SHUTDOWN COOLING AND COOLANT CIRCULATION - LOW WATER LEVEL
Table 3.9.5 Rev.1 May 9, 1997

3.9.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4	L.3 M.3	5	ITS 3.9.5 LCO Note 1 provides an allowance that the SDC loop is not required to be in operation for < 1 hour per 8 hour period provided no operations that would cause boron concentration to change are permitted. This note is added for consistency with CTS 3.9.8.1 which applies to applicability during all water levels and expands the allowance to operations beyond core alterations in the vicinity of the SDC hot leg discharge. Water level requirements provide a volumetric heat sink in the event of loss of SDC (M.1). Water level and Core Alteration restrictions are established in ITS 3.9.6.	Provide discussion and justification for the less restrictive change including securing SDC loop flow during low water level conditions and applicability of L.3 with respect to ITS 3.9.5.	
CCNPP Response:					
5	L.2		Surveillance Requirement CTS 4.9.8.1 requires verification that the SDC loop is operating and the flow rate is > 1500 GPM every four hours. ITS SR 3.9.5.2 sets the frequency at 12 hours.	Explain the safety analysis basis for this change to the ISTS.	
CCNPP Response:					
6	LA.1	6	CTS details for using the spent fuel pool to replace the shutdown cooling loop are proposed to be relocated to the Bases. This proposed change is rejected because these detail represent limiting conditions for operation.	Relocation of allowances which provide limits to operation is not acceptable. Provide a revised submittal that includes the entire CTS # footnote in ITS Note 2.	
CCNPP Response:					

CCNPP ITS 3.9.5 REFUELING OPERATIONS - SHUTDOWN COOLING AND COOLANT CIRCULATION - LOW WATER LEVEL
Table 3.9.5 Rev.1 May 9, 1997

3.9.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
7		7	ITS SR 3.9.5.1 requirements to verify that one SDC loop is in operation are deleted.	This change is rejected until the staff approves a TSTF for this generic change.	
CCNPP Response:					
8		8	Incorporation of CEOG-85 in Bases.	Withhold approval pending staff review of proposed changes.	
CCNPP Response:					
9		2	CEOG-115 (TSTF-197) insert #4 to Bases for Action B.3 was partially used.	Revise the Bases to incorporate all of CEOG-118. Acceptance of CEOG-118 is pending staff review.	
CCNPP Response:					

3.9.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	M.1		The M.1 DOC states that the proposed changes minimize the possibility of a fuel handling accident in containment that is beyond the assumptions of the safety analysis.	Based on the information provided the staff could not confirm the basis of the justification. Provide additional information to document the stated M.1 conclusion.	
CCNPP Response:					
2	M.2		The M.2 DOC concludes that the ITS changes expands the CTS required actions without specifying exactly how this conclusion is reached. In addition the DOC states the change were made to ensure that a fuel handling accident cannot (emphasis added) occur.	Provide clarifying information to support statements that the proposed more restrict change expand CTS requirements and ensures fuel handling accidents cannot occur.	
CCNPP Response:					

CCNPP ITS REFUELING OPERATIONS - RELOCATION
Table for Relocated Requirements Rev.1 May 9, 1997

RELOCATED	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
Decay Time	R1		Incomplete DOC discussion.	Revise R.1 to include evaluation of the 50.36 criteria for ITS.	
CCNPP Response:					