September 3, 1998

Mr. Otto L. Maynard
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
Burlington, Kansas 66839

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON THE PROPOSED CONVERSION TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS FOR WOLF CREEK NUCLEAR GENERATING STATION, UNIT NO. 1 (TAC NO. M98738)

Dear Mr. Maynard:

The Nuclear Regulatory Commission staff is reviewing the Wolf Creek Nuclear Operating Corporation's proposed license amendment to convert the current technical specifications for Wolf Creek Nuclear Generating Station, Unit No. 1 to the Improved Standard Technical Specifications. Wolf Creek Nuclear Operating Corporation provided their proposed license amendment request by letter dated May 15, 1997.

The staff has reviewed selected portions of the application. Based on its review, the staff has determined that additional information is needed in Section 3.8, Subsections 3.4 through 3.8, Electrical Power Systems, as discussed in the enclosure. Since you worked with three other utilities in preparing your submittal, the enclosure contains the request for additional information (RAI) questions for all four utilities. However, you need only reply to the RAI questions associated with the Wolf Creek Nuclear Generating Station, Unit No. 1 as identified in the enclosure.

To assist the staff in maintaining its review schedule, please respond to the questions pertaining to Wolf Creek Nuclear Generating Station, Unit No. 1 within 30 days of the date of this letter. If you have any questions regarding the RAI, please contact me at (301) 415-1362. If all four utilities would like to have a common discussion, a single meeting, or phone call, it can be coordinated by contacting the NRR Lead Project Manager, Jack Donohew at (301) 415-1307.

Sincerely, Original Signed By
Kristine M. Thomas, Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-482

Enclosure: Request for Additional Information

cc w/encl: See next page

DISTRIBUTION:

Docket	OGC
PUBLIC	ACRS
PDIV-2 Reading	PGwynn, RIV
EAdensam (EGA1)	WJohnson, RIV
WBateman	WBeckner
KThomas	EPeyton
JLuehman	

Document Name: WCITS.RAI

OFC	PD4-2	PD4-2	TSB WDB
NAME	KThomas KMT	EPeyton esp	WBeckner
DATE	9/2/98	9/2/98	9/2/98

OFFICIAL RECORD COPY

DF01

cc w/encl:
Jay Silberg, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, NW
Washington, D.C. 20037

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

Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 311
Burlington, Kansas 66839

Chief Engineer
Utilities Division
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

Office of the Governor
State of Kansas
Topeka, Kansas 66612

Attorney General
Judicial Center
301 S.W. 10th
2nd Floor
Topeka, Kansas 66612

County Clerk
Coffey County Courthouse
Burlington, Kansas 66839

Vick L. Cooper, Chief
Radiation Control Program
Kansas Department of Health
and Environment
Bureau of Air and Radiation
Forbes Field Building 283
Topeka, Kansas 66620

Chief Operating Officer
Wolf Creek Nuclear Operating Corporation
P. O. Box 411
Burlington, Kansas 66839

Supervisor Licensing
Wolf Creek Nuclear Operating Corporation
P.O. Box 411
Burlington, Kansas 66839

U.S. Nuclear Regulatory Commission
Resident Inspectors Office
8201 NRC Road
Steedman, Missouri 65077-1032

FOUR LOOP GROUP (FLOG) IMPROVED TS REVIEW COMMENTS
ITS SECTION 3.8 - ELECTRICAL POWER SYSTEMS
SUBSECTIONS 3.4 through 3.8

3.8.4 - DC Sources - Operating

3.8.4-01	**Callaway**	**Description of Change (DOC) 02-01-LG** **CTS LCO 3.8.2** **JFD 3.8-45** **ITS LCO 3.8.4**

The proposed limiting condition for operation (LCO) and the justification for difference (JFD) are not consistent with the proposed ITS Bases or with the current Technical Specifications (CTS). The proposed Bases indicated that more than one train of safety equipment may be required at times. The LCO and the JFD are based on only a single train being required. The LCO and the JFD are in conflict with the Bases. They are also in conflict with the CTS which states "As a minimum...."

Comment: Some correction is required here. In addition, a justification for deleting CTS "As a minimum..." is required. This comment applies to the LCO and to Required Action A Note.

FLOG Response:

3.8.4-02	**Callaway** **DCPP** **WCGS**	**DOC 02-01-LG** **ITS 3.8.4 Condition A and Required Action A.1** **STS 3.8.4 Condition A and Required Action A.1** **CTS 3/4.8.3.1 Action**

Condition A and Required Action A.1 for Standard Technical Specifications (STS) 3.8.4 require that with one DC electrical power subsystem inoperable, restore the DC electrical power subsystem to Operable status. This requirement has been adopted as Condition A and Required Action A.1 for corresponding ITS 3.8.4. The Action for corresponding CTS 3/4.8.3.1 requires that with one of the required battery banks and/or full capacity chargers inoperable, restore the inoperable battery bank and/or full capacity charger to Operable status. DOC 02-01-LG states that the list of batteries and chargers would be moved to the Bases.

Comment: DOC 02-01-LG does not address this proposed change. Revise the submittal to provide the appropriate justification for the proposed change and state how the relocated TS items will be controlled (e.g., 10 CFR 50.59 or other regulations).

FLOG Response:

3.8.4-03 DCPP ITS LCO 3.8.4, Condition B

What is the purpose of the second part of this Condition? It appears to be redundant to the first part of the Condition; i.e., if a battery charger was not being powered from its associated 480 vac vital bus, it must be powered from another 480 vac vital bus. This invokes the first part of the Condition, thereby making the second part unnecessary.

Comment: Consideration should be given to revising the Condition.

FLOG Response:

3.8.4-04 Callaway DOC 02-01-LG
ITS 3.8.4 Condition B and Required Actions B.1 and B.2
STS 3.8.4 Conditions Band Required Actions B.1 and B.2
CTS 3/4.8.2.1 Action

Condition B and Required Actions B.1 and B.2 for STS 3.8.4 specify that for Required Action and associated Completion Time not met, be in Mode 3 and Mode 5 with respective Completion Times of 6 and 36 hours. These requirements have been adopted as Condition B and Required Actions B.1 and B.2 for corresponding ITS 3.8.4. The Action for corresponding CTS 3/4.8.2.1 requires, "... or be in at least Hot Standby within the next 6 hours and in Cold Shutdown within the following 30 hours." DOC 02-01-LG states that the list of batteries and chargers would be moved to the Bases.

Comment: DOC 02-01-LG does not address this proposed change. Revise the submittal to provide the appropriate justification and state how the relocated TS items will be controlled for the proposed change (i.e., 10 CFR 50.59 or others).

FLOG Response:

3.8.4-05 All JFD 3.8-34
DOC 02-06-LS
ITS SR 3.8.4.1 Frequency
Bases for ITS SR 3.8.4.1, STS Bases markup page B 3.8-60
CTS 4.8.[2,3].1.a.2
STS SR 3.8.4.1 Frequency

The Frequency for STS SR 3.8.4.1 is 7 days which is consistent with corresponding CTS 4.8.2(3).1.a.2. The Frequency for corresponding ITS SR 3.8.4.1 is 31 days. JFD 03-08-34 and DOC 02-06-LS reference TSTF-115.

Comment: TSTF-115 has been rejected. Revise the submittal to conform to the STS.

FLOG Response:

3.8.4-06 Callaway CTS 4.8.2.1.d footnote #

Footnote # to CTS 4.8.2.1.d addresses the performance of the Surveillance Requirement prior to restart following the first refueling, and also addresses the provisions of Specification 4.0.2. This material has not been retained in corresponding ITS 3.8.4.

Comment: No justification has been provided to support this proposed change. Revise the submittal to provide the appropriate justification for the proposed change.

FLOG Response:

3.8.4-07 DCPP STS SRs 3.8.4.2 and 3.8.4.5
ITS SRs 3.8.4.2 and 3.8.4.5
Bases for ITS SRs 3.8.4.2 and 3.8.4.5, STS Bases markup pages B 3.8-105 and 107

STS SRs 3.8.4.2 and 3.8.4.5 require verifying that battery connection resistance is ≤ [1E-5 ohm] for inter-tier connections. These requirements have not been adopted in corresponding ITS SRs 3.8.4.2 and 3.8.4.5.

Comment: No justification has been provided to support this proposed difference. Revise the submittal to provide the appropriate justification or conform to the STS.

FLOG Response:

3.8.4-08 WCGS JFD 3.8-38
DOC 02-25-LS
ITS SR 3.8.4.7 Note 1
Bases for ITS SR 3.8.4.7, STS Bases markup page B 3.8-60
CTS 4.8.2.1.e
STS SR 3.8.4.7 Note 1

Note 1 for STS SR 3.8.4.7 states that the modified performance discharge test may be performed in lieu of the service test once per 60 months. Corresponding CTS 4.8.2.1.e states that the performance discharge test may be performed in lieu of the service test once per 60 months. Note 1 for corresponding ITS SR 3.8.4.7 has not retained "once per 60 months." JFD 03-08-38 and DOC 02-25-LS reference TSTF-115.

Comment: TSTF-115 has been rejected. Revise the submittal to conform to the STS. Also, provide the load profiles for the modified performance discharge test and the service test that will be substituted for the service test. The purpose of this request is to provide assurance that the staff and the licensee are in agreement regarding what a modified performance discharge test is and when it may be substituted for a service test.

FLOG Response:

3.8.4-09	**All**	**JFD 3.8-39** **ITS SR 3.8.4.6**

The proposed deletion of the Mode restriction Note does not appear to be acceptable. It is suggested that the Note be modified to state that this SR will not be performed on the OPERABLE battery charger in Modes 1, 2, 3, or 4. The OPERABLE charger is the one aligned to the battery/bus and which is credited for meeting the LCO.

Comment: Revising the Note in this manner will avoid all potential confusion regarding when and on which battery charger surveillance may be performed. Consideration should be given to retaining the Mode Restriction Note in a modified form; i.e., this surveillance shall not be performed on the OPERABLE battery charger in Modes 1, 2, 3, or 4.

FLOG Response:

3.8.4-10	**Callaway** **CPSES**	**JFD 3.8-38** **DOC 02-25-LS** **ITS SR 3.8.4.7 Note 1** **Bases for ITS SR 3.8.4.7, STS Bases markup page B 3.8-63** **CTS 4.8.2.1.e** **STS SR 3.8.4.7 Note 1**

Note 1 for STS SR 3.8.4.7 states that the modified performance discharge test may be performed in lieu of the service test once per 60 months. Corresponding CTS 4.8.2.1.e states that the performance discharge test may be performed in lieu of the service test once per 60 months. Note 1 for corresponding ITS SR 3.8.4.7 has not retained "once per 60 months." JFD 03-08-38 and DOC 02-25-LS reference TSTF-115.

Comment: TSTF-115 has been rejected. Revise the submittal to conform to the STS. Also, provide the load profiles for the modified performance discharge test and the service test. The purpose of this request is to provide assurance that the staff and the licensee are in agreement regarding what a modified performance discharge test is and when it may be substituted for a service test.

FLOG Response:

3.8.4-11	**DCPP**	**JFD 3.8-38** **ITS SR 3.8.4.7 Note 1** **CTS 4.8.2.1.e**

CTS 4.8.2.1.e states that the performance discharge test may be performed in lieu of the service test. Note 1 for corresponding ITS SR 3.8.4.7 states that the modified performance discharge test may be performed in lieu of the service test.

Comment: Provide the load profiles for the modified performance discharge test and the service test. The purpose of this request is to provide assurance that the staff and the licensee are in agreement regarding what a modified performance discharge test is and when it may be substituted for a service test.

FLOG Response:

3.8.4-12	**Callaway**	**CTS SR 4.8.2.1.e** **DOC 02-25-LS-23** **ITS SR 3.8.4.8** **JFD 3.8.-16**

Provide a load profile for the battery service test and for the modified performance discharge test that will be substituted for the service test.

Comment: The purpose of this request is to provide assurance that the staff and the licensee are in agreement regarding what a modified performance discharge test is and when it may be substituted for a service test. Also revise DOC 02-25-LS-23 because TSTF-115 has been rejected.

FLOG Response:

3.8.4-13	**WCGS**	**Bases for ITS SR 3.8.4.2, STS Bases markup page B 3.8-57** **Bases for STS SR 3.8.4.2**

The Bases for ITS SR 3.8.4.2 states, "The visual inspection is to detect corrosion in cell post connection area; corrosion outside the connection area is not an operability concern and would not require measuring resistance." This is a proposed difference relative to the Bases for corresponding STS SR 3.8.4.2.

Comment: No justification has been provided for this proposed difference. Revise the submittal to explain why corrosion outside the connection area is not an operability concern.

FLOG Response:

3.8.4-14	**CPSES**	**Bases for ITS SR 3.8.4.3, STS Bases markup page B 3.8-51** **Bases for STS SR 3.8.4.3** **ITS SR 3.8.4.3** **JFD 3.8-41** **CTS 4.8.2.1.c.1**

Changes have been proposed for CTS 4.8.2.1.c.1 in accordance with TSTF-38, and are provided as corresponding ITS SR 3.8.4.3. Additionally, differences have been proposed for the Bases for corresponding STS SR 3.8.4.3 as the Bases for corresponding ITS SR 3.8.4.3 which states, "Visible corrosion discovered during the performance of the surveillance is acceptable provided that the battery terminal resistance is less than 150 x 10^{-6} ohms. Visible corrosion discovered between surveillances does not invalidate the current surveillance."

Comment: The proposed ITS Bases difference does not conform to the acceptable Bases difference provided by TSTF-38. No justification has been provided to support the proposed ITS Bases difference. Revise the submittal to conform to TSTF-38.

FLOG Response:

3.8.4-15	**WCGS**	**ITS SR 3.8.4.6** **Bases for ITS SR 3.8.4.6, STS Bases page B 3.8-59**

The Bases for ITS SR 3.8.4.6 refers to a Note. ITS SR 3.8.4.6 does not contain a Note.

Comment: Revise the submittal to resolve this discrepancy.

FLOG Response:

3.8.4-16	**Callaway** **DCPP**	**JFD 3.8-16** **ITS SR 3.8.4.8 Frequency** **Bases for ITS SR 3.8.4.8, STS Bases markup page B 3.8-65** **STS SR 3.8.4.8 Frequency**

(Callaway) The Frequency for STS SR 3.8.4.8 is 24 months when the battery has reached [85]% of the expected life with capacity ≥ 100% of the manufacturer's rating. This Frequency has not been adopted in corresponding ITS SR 3.8.4.8. JFD 3.8-16 states that this requirement would be adopted.

(Callaway) The Frequency for STS SR 3.8.4.8 is 18 months when the battery has reached [85]% of the expected life with capacity <100% of the manufacturer's rating. Corresponding ITS SR 3.8.4.8 has not adopted "with capacity <100% of the manufacturer's rating." JFD 3.8-16 states that this would be retained.

(DCPP) The Frequency for STS SR 3.8.4.8 is 18 months when the battery has reached [85]% of the expected life with capacity < 100% of the manufacturer's rating. The Frequency for corresponding ITS SR 3.8.4.8 is 18 months when the battery has reached 85% of the expected life for the application. JFD 03.8-16 states that, "and was less than 100% on the last performance test" would be retained.

Comment: There is a discrepancy between the STS markup and JFD 03.8-16. Revise the submittal to resolve the discrepancy.

FLOG Response:

3.8.4-17 WCGS CTS 4.8.2.1.f
ITS SR 3.8.4.8 Frequency
STS SR 3.8.4.8 Frequency

The Frequency for STS SR 3.8.4.8 is 18 months when the battery has reached 85% of expected life with capacity < 100% of manufacturer's rating . This Frequency has been adopted in corresponding ITS SR 3.8.4.8. Corresponding CTS 4.8.2.1.f is required to be performed when the battery has reached 85% of the service life expected for the application. The capacity for this SR should be 95% of rated capacity for the currently installed AT&T round-cells with no aging factor.

Comment: This is an additional requirement for the CTS and the ITS. Based on the criteria in the Commission's Final Policy Statement on technical specification improvements for nuclear power reactors, the NRC staff has concluded that this additional requirement is needed in the technical specifications, based on the batteries installed at WCGS. Provide a justification why this requirement should not be added to both technical specifications. If this is to be added to the CTS and ITS, revise the submittal to provide the appropriate justification. Also, this additional requirement would be a beyond scope issue for the ITS conversion.

FLOG Response:

3.8.4-18 Callaway CTS SR 4.8.2.1.f
DOC 02-18-LG
ITS SR 3.8.4.8
JFD 3.8.16
Markup Bases page B3.8-65

The definition of degradation (proposed for moving to the Bases) is not acceptable. Degradation has occurred when the battery capacity drops more than 10% from the previous performance test, not 10% from the average of the previous performance tests.

Comment: The proposed ITS Bases should be revised to reflect this definition of degradation.

FLOG Response:

3.8.4-19	**CPSES**	**Bases for ITS SR 3.8.4.7, STS Bases markup page B 3.8-53** **Bases for STS SR 3.8.4.7** **Bases for ITS SR 3.8.4.8, STS Bases markup page B 3.8-54** **Bases for STS SR 3.8.4.8**

The Bases for ITS SRs 3.8.4.7 and 3.8.4.8 state, "The SR is modified by a Note. This Note does not allow the surveillance to normally be performed in Modes 1, 2, 3, or 4. This Note does not prohibit the application of LCO 3.0.5 or the performance of this SR to restore equipment operability." This is a proposed difference with the Bases for corresponding STS SRs 3.8.4.7 and 3.8.4.8. The Bases cannot modify the TS. The prohibition on performing this SR in Modes 1 and 2 is all inclusive, and cannot be negated by a Bases statement. This is an issue that must be resolved as part of TSTS-283.

Comment: Revise the submittal to provide the appropriate justification or conform to the STS.

FLOG Response:

3.8.4-20	**CPSES**	**Bases for ITS SR 3.8.4.8, STS Bases markup page B 3.8-54** **Bases for STS SR 3.8.4.8** **ITS SR 3.8.4.8 Frequency**

A portion of the Frequency for ITS SR 3.8.4.8 states, "... and capacity is < 100% of the manufacturer's rating." This statement also appears in the Bases for corresponding STS SR 3.8.4.8. This statement has not been adopted in the Bases for ITS SR 3.8.4.8.

Comment: The Bases appears to be discrepant relative to ITS SR 3.8.4.8. Revise the submittal to correct the discrepancy in the ITS Bases.

FLOG Response:

3.8.4-21	**Callaway**	**Bases for ITS SR 3.8.4.2, STS Bases markup page B 3.8-61** **Bases for STS SR 3.8.4.2**

The Bases for ITS SR 3.8.4.2 states, "The visual inspection is to detect corrosion in cell post connection area; corrosion outside the connection area is not an operability concern and would not require measuring resistance." This is a proposed difference relative to the Bases for corresponding STS SR 3.8.4.2.

Comment: No justification has been provided for this proposed difference. Revise the submittal to explain why corrosion outside the connection area is not an operability concern.

FLOG Response:

3.8.4-22 Callaway ITS SR 3.8.4.6
Bases for ITS SR 3.8.4.6, STS Bases page B 3.8-63

The Bases for ITS SR 3.8.4.6 refers to a Note. ITS SR 3.8.4.6 does not contain a Note.

Comment: Revise the submittal to resolve this discrepancy.

FLOG Response:

3.8.4-23 DCPP Bases Background for ITS 3.8.4, STS Bases markup page B 3.8-99, Last paragraph

The Bases Background for ITS 3.8.4 describes the capacity of the battery chargers.

Comment: Material appears to be missing from the last paragraph. Revise the submittal to complete the Bases Background.

FLOG Response:

3.8.4-24 DCPP Bases Applicable Safety Analysis for ITS 3.8.4, STS Bases markup page B 3.8-101, last paragraph

Comment: Revise the submittal to delete the reference to the NRC Policy Statement.

FLOG Response:

3.8.4-25 DCPP Bases for ITS SR 3.8.4.2, STS Bases markup page B 3.8-105, first paragraph
Bases for ITS SR 3.8.4.5, STS Bases markup page B 3.8-107, first paragraph
Bases for STS SRs 3.8.4.2 and 3.8.4.5

The Bases for ITS SRs 3.8.4.2 and 3.8.4.5 state, "The resistance of cell to cell connecting cables does not have to be included in measurement of connection resistance." These are proposed differences relative to the Bases for corresponding STS SRs 3.8.4.2 and 3.8.4.5.

Comment: No justification has been provided to support these proposed differences. Revise the submittal to provide the appropriate justification or conform to the STS.

FLOG Response:

3.8.4-26 DCPP Bases for ITS SR 3.8.4.7, STS Bases markup page B 3.8-111
Bases for STS SR 3.8.4.7

The Bases for ITS SR 3.8.4.7 states, "The modified performance discharge test and service test should be performed in accordance with IEEE-450." This is a proposed difference with the Bases for corresponding STS SR 3.8.4.7.

Comment: No justification has been provided to support this proposed difference. Revise the submittal to provide the appropriate justification or conform to the STS.

FLOG Response:

3.8.4-27 DCPP Bases for ITS SR 3.8.4.7, STS Bases markup page B 3.8-111
Bases for STS SR 3.8.4.7
Bases for ITS SR 3.8.4.8, STS Bases markup page B 3.8-114
Bases for STS SR 3.8.4.8

The Bases for ITS SRs 3.8.4.7 and 3.8.4.8 state, "This Note does not prohibit the application of LCO 3.0.5." These are proposed differences with the Bases for corresponding STS SRs 3.8.4.7 and 3.8.4.8.

Comment: No justification has been provided to support these proposed differences. Revise the submittal to provide the appropriate justification or conform to the STS.

FLOG Response:

3.8.4-28 DCPP Bases for ITS SR 3.8.4.8, STS Bases markup page B 3.8-113, Third paragraph
Bases for STS SR 3.8.4.8

The Bases for ITS SRs 3.8.4.8 states, "However, if the battery shows no degradation but has reached 85% of its expected life, the Surveillance Frequency is only reduced to 24 months for batteries that retain capacity ≥ 100% of the manufacturer's rating." This material has not been adopted in the Bases for corresponding ITS SR 3.8.4.8. However, this material appears to be consistent with the Frequency for corresponding ITS SR 3.8.4.8.

Comment: The Bases appear to be discrepant relative to ITS SR 3.8.4.8. Revise the Bases to conform to the STS.

FLOG Response:

3.8.4-29 **WCGS** **DOC 02-20-A**
CTS 4.8.2.1.a.2
ITS SR 3.8.4.1
CTS 4.8.2.1.c.4
ITS SR 3.8.4.6
Bases for ITS SR 3.8.4.6, STS Bases markup page B 3.8-59

CTSs 4.8.2.1.a.2 and 4.8.2.1.c.4 specify the battery voltage as 130.2 volts. Corresponding ITS SRs 3.8.4.1 and 3.8.4.6 specify the battery voltage as 128.4 volts.

Comment: These proposed changes are beyond the scope of the ITS and should be identified as such by the licensee. Justify why this change is administrative which is no change to the requirements in the CTS. This change appears to be a less restrictive change that reduces the minimum allowable total battery voltage.

FLOG Response:

3.8.5 - DC Sources - Shutdown

3.8.5-01 **DCPP** **JFD 3.8-35**
ITS 3.8.5 Actions Note
Bases for ITS 3.8.5 Actions
STS 3.8.5 Actions

The Actions Note for ITS 3.8.5 states that LCO 3.0.3 is not applicable. This is a proposed difference with corresponding STS 3.8.5 and a change relative to corresponding CTS 3/4.8.3.2. JFD 03-08-35 states that this proposed difference is consistent with TSTF-36. This proposed change is not shown on the CTS markup, and no justification has been provided to support the proposed change.

Comment: TSTF-36 has not been approved yet. Revise JFD to justify the proposed change.

FLOG Response:

3.8.5-02 **WCGS** **DOC 02-15-LS-4**
ITS SR 3.8.5.1 Note
STS SR 3.8.5.1 Note
CTS 4.8.2.2

The Note for STS SR 3.8.5.1 states, "The following SRs are not required to be performed: SR 3.8.4.6, SR 3.8.4.7, and SR 3.8.4.8." This Note has been adopted in corresponding ITS SR 3.8.5.1. DOC 02-15-LS-4 describes the proposed change.

Comment: DOC 02-15-LS-4 does not explain why the proposed change is acceptable. Revise the submittal to explain why the proposed change is acceptable.

FLOG Response:

3.8.5-03 CPSES CTS 3/4.8.2.2 Applicability
ITS 3.8.5 Applicability
Bases Applicable Safety Analysis discussion for ITS 3.8.5, STS Bases markup page B 3.8-57

The Applicability for CTS 3/4.8.2.2 is Modes 5 and 6, which has been retained in corresponding ITS 3.8.5. The Bases Applicable Safety Analysis discussion for ITS 3.8.5 states, "The operability of the minimum DC electrical power sources during Modes 5 and 6 and during movement of irradiated fuel assemblies ensures ..."

Comment: There appears to be a discrepancy between the Applicability for ITS 3.8.5 and the Bases Applicable Safety Analysis discussion. Revise the submittal to resolve the discrepancy.

FLOG Response:

3.8.5-04 WCGS Bases for Applicable Safety Analyses for ITS 3.8.5, STS Bases markup pages B 3.8-63 and 64
Bases for Applicable Safety Analyses for STS 3.8.5

The Bases for Applicable Safety Analyses for ITS 3.8.5 contains generic descriptive material that compares the requirements in Modes 5 and 6 with those in Modes 1, 2, 3, and 4. This is a proposed difference relative to Bases for Applicable Safety Analyses for corresponding STS 3.8.5.

Comment: No justification has been provided to support this proposed difference. Revise the submittal to provide the appropriate justification for the proposed difference or conform to the STS.

FLOG Response:

3.8.5-05 Callaway Bases for Applicable Safety Analyses for ITS 3.8.5, STS Bases markup pages B 3.8-67 and 68
Bases for Applicable Safety Analyses for STS 3.8.5

The Bases for Applicable Safety Analyses for ITS 3.8.5 contains generic descriptive material that compares the requirements in Modes 5 and 6 with those in Modes 1, 2, 3, and 4. This is a proposed difference relative to Bases for Applicable Safety Analyses for corresponding STS 3.8.5.

Comment: No justification has been provided to support this proposed difference. Revise the submittal to provide the appropriate justification for the proposed difference or conform to the STS.

FLOG Response:

3.8.5-06 DCPP Bases for ITS LCO 3.8.5, STS Bases markup page B 3.8-118
Bases for STS LCO 3.8.5

The Bases for ITS LCO 3.8.5 includes a discussion regarding cross-tie between DC busses. There is no provision for this in the DCPP CTS, and no such provisions are included in the ITS.

Comment: No justification has been provided to support this proposed difference. Since this Bases discussion addresses a permissive that is not included in TS, it should be deleted from the Bases. Alternatively, the TS can be modified to allow cross-tie provided the allowance can be justified. Revise the submittal to provide the appropriate justification for the proposed difference.

FLOG Response:

3.8.5-07 DCPP DOC 02-13-A
ITS LCO 3.8.5
STS LCO 3.8.5
CTS 3.8.3.2
Bases for ITS LCO 3.8.5, STS Bases markup page B 3.8-118
Bases for STS LCO 3.8.5

STS LCO 3.8.5 specifies the DC electrical power subsystem requirements. These requirements have been adopted as corresponding ITS LCO 3.8.5 which states, "The Class 1E DC electrical power subsystem shall be Operable to support the DC electrical power distribution subsystem(s) required by LCO 3.8.10, Distribution Systems - Shutdown." This is a proposed change relative to corresponding CTS 3.8.3.2 that states, "As a minimum, one 125 volt battery bank and an associated full capacity charger shall be Operable." The Bases for ITS LCO 3.8.5 describes an Operable subsystem as A DC bus connected to a battery with an Operable battery charger which is fed from an Operable AC vital bus. The Bases also goes on to describe cross-tie arrangements. This is a proposed difference with the Bases for corresponding STS 3.8.5. The proposed change has been characterized as administrative.

Comment: The proposed change appears to be less restrictive. Revise the submittal to provide the appropriate justification for the proposed change. The Bases discussion addresses a permissive that is not included in TS and it should be deleted from the Bases. Alternatively, the TS can be modified to allow cross-tie provided the allowance can be justified. The justification shall include an evaluation of all of the events identified in the USAR that are postulated to occur during the Applicability. The evaluation should confirm that all of the

equipment that is assumed to operate to mitigate the various postulated events can still be relied on to operate with this proposed change.

FLOG Response:

3.8.6 - Battery Cell Parameters

3.8.6-01 **All** **JFD 3.8-34**
DOC 2-06-LS-22
ITS SR 3.8.6.1 Frequency
STS SR 3.8.6.1 Frequency
CTS 4.8.2(3).1.a.1
Bases for ITS SR 3.8.6.1

STS SR 3.8.6.1 requires verifying that the battery cell parameters meet Table 3.8.6-1 Category A limits with a Frequency of 7 days. This requirement is consistent with corresponding CTS 4.8.3.1.a.1. Corresponding ITS SR 3.8.6.1 has a Frequency of 31 days. JFD 03.08-34 and DOC 02-06-LS-22 reference TSTF-115 as the basis for the proposed change.

Comment: TSTF-115 has been rejected. Revise the submittal to conform to the STS.

FLOG Response:

3.8.6-02 **WCGS** **DOC 2-20-A**
JFD 3.8-27
ITS Table 3.8.6-1 Float Voltages
CTS Table 4.8-2 Float Voltages
ITS Table 3.8.6-1 footnote (d)
STS Table 3.8.6-1
CTS Table 4.8-2 Note 6
Bases for ITS Table 3.8.6-1, STS Bases markup pages B 3.8-72, second paragraph and B 3.8.73, third paragraph

The Float Voltages for ITS Table 3.8.6-1 are 2.14 V for Categories A and B, and 2.09 V for Category C. These are proposed changes relative to the Float Voltages for corresponding CTS Table 4.8-2 which lists 2.13 V for the Category A and B limits, and 2.07 V for the Category B allowable value. DOC 02-20-A and JFD 03.08-27 state that these proposed changes are based on the battery manufacturer's recommendations.

Footnote (d) to ITS Table 3.8.6-1 states, "Provided no Lead-Sulfate crystals exist it is acceptable for the float voltages in Category "A," "B," and "C" to be 0.02 volts lower." This is a proposed difference relative to corresponding ITS Table 3.8.6-1 and is a proposed change

relative to corresponding CTS Table 4.8-2. DOC 02-20-A and JFD 03.08-27 state that these proposed changes are based on the battery manufacturer's recommendations.

Comment: The licensee should provide an expanded discussion of why Table 3.8-6 footnote 6 is acceptable. DOC 02-20-A and JFD 03.08-27 are not adequate. The discussion should address lead-sulfate crystals, where they occur, and why the absence or presence of the crystals would make a difference in voltage. The licensee should provide the basis, beyond the reference to the manufacturer's recommendations, for why, in the absence of lead-sulfate crystals, the float voltages in the three categories can be 0.02 volts lower. This appears not to be an administrative change. The revised DOC should include applicable references to standards.

FLOG Response:

3.8.6-03	**DCPP**	**DOC 02-17-LS-2** **CTS 4.8.3.1.b** **ITS 3.8.6.2**

DOC 02-17-LS-2 is confusing

Comment: As worded, it appears that the CTS requirements to verify no visible corrosion and to verify electrolyte temperature are being deleted. Apparently, however, the intent of this DOC and associated change is to delete these requirements only following a battery discharge or overcharge. If this is correct, the DOC should be revised accordingly.

FLOG Response:

3.8.6-04	**DCPP**	**DOC 02-22-A** **ITS SR 3.8.6.3** **STS SR 3.8.6.3** **CTS 4.8.3.1.b.3**

STS SR 3.8.6.3 requires verifying that the average electrolyte temperature of representative cells is ≥ 60°F. This requirement has been adopted in corresponding ITS SR 3.8.6.3. Corresponding CTS 4.8.3.1.b.3 requires "above 60°F." The proposed change has been categorized as administrative.

Comment: DOC 02-22-A does not explain why this proposed change is administrative. The proposed change appears to be less restrictive. Revise the submittal to provide the appropriate justification.

FLOG Response:

3.8.6-05	**All**	**DOC 02-07-A** **ITS Table 3.8.6-1 footnote (a)** **STS Table 3.8.6-1 footnote (a)** **CTS Table 4.8-2(3)**

Footnote (a) to STS Table 3.8.6-1 states, "It is acceptable for the electrolyte level to temporarily increase above the specified maximum during equalizing charges provided it is not overflowing." This material has been adopted as footnote (a) to corresponding ITS Table 3.8.6-1 which is a change relative to corresponding CTS Table 4.8-2. The proposed change has been categorized as administrative.

Comment: DOC 02-07-A does not explain why the proposed change is administrative. The proposed change appears to be less restrictive. Revise the submittal to provide the appropriate justification for the proposed change.

FLOG Response:

3.8.6-06	**All**	**DOC 02-10-A** **ITS Table 3.8.6-1 footnote (b)** **STS Table 3.8.6-1 footnote (b)** **CTS Table 4.8-2(3) Notation (4)**

Footnote (b) to STS Table 3.8.6-1 states, "Level correction is not required, however, when battery charging is < 2 amps when on float charge." This material has been adopted as footnote (b) to corresponding ITS Table 3.8.6-1 which is a change relative to corresponding CTS Table 4.8-2 Notation (4). The proposed change has been categorized as administrative.

Comment: The proposed change appears to be less restrictive. Revise the submittal to provide the appropriate justification for the proposed change.

FLOG Response:

3.8.6-07	**DCPP**	**DOC 02-12-LG** **CTS Table 4.8-3 Table Notation (6)** **Bases for ITS Table 3.8.6-1, STS Bases markup page B 3.8-130**

CTS Table 4.8-3, Table Notation (6), states, "Corrected for average electrolyte temperature," is applicable to the Category B limit for the float voltage. DOC 02-12-LG states that this material will be moved to the Bases.

Comment: This material could not be found in the Bases for ITS Table 3.8.6-1. Revise the Bases to implement DOC 02-12-LG.

FLOG Response:

3.8.6-08 **CPSES** **DOC 02-12-LG**
CTS Table 4.8-2 Table Notation (6)
Bases for ITS Table 3.8.6-1, STS Bases markup pages B 3.8-63, paragraph 4, and B 3.8-64, paragraph 3

CTS Table 4.8-2, Table Notation (6), states, "Corrected for average electrolyte temperature," is applicable to the Category B limit for the float voltage. DOC 02-12-LG states that this material will be moved to the Bases. The portion of the Bases for ITS Table 3.8.6-1 that addresses the Category A limits contains the statement, "Float voltage is corrected for average electrolyte temperature." This statement does not appear in the Bases discussion of the Category B limits.

Comment: The footnote is a modification to the TS. Consequently, the footnote needs to be retained in TS Table 3.8.6-1. If this is not acceptable, the footnote should be deleted. If included in the TS, ensure that the Note is applicable to the correct Category.

FLOG Response:

3.8.6-09 **CPSES** **DOC 02-18-LG**
DCPP **CTS 4.8.2(3).1.b.3**
ITS SR 3.8.6.3
Bases for ITS SR 3.8.6.3, STS Bases page B 3.8-128

(CPSES) CTS 4.8.2.1.b.3 refers to "12 connected cells." Corresponding ITS SR 3.8.6.3 refers to "representative cells." DOC 02-18-LG states that the number of connected cells that constitutes the "representative cells" requirement would be moved to the Bases.

(DCPP) CTS 4.8.3.1.b.3 refers to "10 of the connected cells." Corresponding ITS SR 3.8.6.3 refers to "representative cells." DOC 02-18-LG states that the number of connected cells that constitutes the "representative cells" requirement would be moved to the Bases.

Comment: This material could not be found in the Bases for ITS SR 3.8.6.3. Revise the Bases to implement DOC 02-18-LG.

FLOG Response:

3.8.6-10 **WCGS** **STS Table 3.8.6-1 footnote (c)**
ITS Table 3.8.6-1 footnote (c)

Footnote (c) to STS Table 3.8.6-1 is acceptable based on CTS, however it should be noted that footnote (c) is not applicable to Category B. In order to meet the requirements of Category B, which applies to all connected cells, the specific gravity for each cell must be measured and be

within the specified values. Float current less than 2 amps is not acceptable for meeting Category B limits.

Comment: Consideration should be given to retaining NUREG footnote (c) in its entirety with applicability as shown in NUREG Table 3.8.6-1.

FLOG Response:

3.8.7 - Inverters - Operating

3.8.7-01 CPSES ITS LCO 3.8.7
STS LCO 3.8.7

At CPSES there are four inverters per train (a total of eight). The proposed wording of LCO 3.8.7 can be interpreted to mean that all eight inverters may be disconnected from their associated DC bus. This is not acceptable.

Comment: The LCO should be revised to limit the number of inverters that may be disconnected to two.

FLOG Response:

3.8.7-02 CPSES STS LCO 3.8.7 Note
ITS LCO 3.8.7 Note
Bases for ITS LCO 3.8.7, STS Bases markup page B 3.8-67
CTS 3.8.3.1.c, d, e, and f footnote ★

The Note for STS LCO 3.8.7 states, "[One/two] inverter(s) may be disconnected from..." The Note for ITS LCO 3.8.7 states, "Inverters may be disconnected from..." The Bases for ITS LCO 3.8.7 states, "This LCO is modified by a Note that allows two inverters to be disconnected from a common battery..."

Comment: The Note for ITS LCO 3.8.7 seems unnecessarily vague. Revise the submittal to conform to the STS. The LCO should state the number of inverters that may be disconnected; i.e., two inverters from a common battery.

FLOG Response:

3.8.7-03	**WCGS**	**Bases for ITS LCO 3.8.7, STS Bases markup page B 3.8-76** **Bases for ITS SR 3.8.7.1, STS Bases markup page B 3.8-78** **ITS SR 3.8.7.1**

The Bases for ITS LCO 3.8.7 refers to the inverter output voltage and frequency being within tolerances. ITS SR 3.8.7.1 and its Bases refer to the output voltage of the inverter, but do not refer to the frequency.

Comment: There is an apparent discrepancy between the Bases for ITS LCO 3.8.7 and ITS SR 3.8.7.1 and its Bases. Revise the submittal to resolve the discrepancy.

FLOG Response:

3.8.7-04	**Callaway**	**Bases for ITS LCO 3.8.7, STS Bases markup page B 3.8-80** **Bases for ITS SR 3.8.7.1, STS Bases markup page B 3.8-82** **ITS SR 3.8.7.1**

The Bases for ITS LCO 3.8.7 refers to the inverter output voltage and frequency being within tolerances. ITS SR 3.8.7.1 and its Bases refer to the output voltage of the inverter, but not to the frequency.

Comment: There is an apparent discrepancy between the Bases for ITS LCO 3.8.7 and ITS SR 3.8.7.1 and its Bases. Revise the submittal to resolve the discrepancy.

FLOG Response:

3.8.8 - Inverters - Shutdown

3.8.8-01	**Callaway** **CPSES**	**ITS LCO 3.8.8** **CTS LCO 3.8.3.2**

ITS LCO 3.8.8 states, "The Train A or Train B inverters shall be Operable to support one train of the onsite Class 1E AC vital bus electrical power distribution subsystem required by LCO 3.8.10, Distribution Systems - Shutdown." This is a proposed change relative to the CTS.

Comment: (Callaway) The CTS requirement is "as a minimum, one of the following 120 VAC Vital busses shall be energized...." This is interpreted to mean that more than one could be required at any time. The ITS says "Train A <u>or</u> Train B (i.e., one train) inverters.. OPERABLE...." DOC 03-06-LS-26 does not address this difference. The submittal should be revised to address the staff's concern.

(CPSES) This LCO does not seem to be consistent with the Bases for LCO 3.8.10 or LCO 3.8.2. This LCO indicates that <u>one</u> train of Vital AC electrical power is required. However, the Bases for LCO 3.8.10 as well as 3.8.2 indicate that a second train of AC and Vital AC electrical

power may be required. This inconsistency needs to be addressed. Also, Action A.1 is an allowance to declare required features inoperable that is based on two trains of electrical power being required. Action A.1 is not appropriate for the LCO as written. The CTS requirement is "as a minimum, one of the following 120 VAC Vital busses shall be energized...." This is interpreted to mean that more than one could be required any time. The ITS says "Train A or Train B (i.e., one train) inverter... OPERABLE...." DOC 03-06-LS-26 does not address this difference. The submittal should be revised.

FLOG Response:

3.8.8-02	**Callaway**	**ITS LCO 3.8.8** **CTS LCO 3.8.3.2**

The Bases for LCO 3.8.2 indicate that there may be times when more than one train of safety equipment is required to be OPERABLE. Given this, how will DC power for support of the second train be made available since the LCO (and JFD 3.8-45) specifically address only one Train of DC being required?

Comment: How does the proposed LCO address the CTS wording of "As a minimum..."? Revise the Bases to address this staff concern.

FLOG Response:

3.8.8-03	**Callaway** **WCGS**	**Bases for Applicable Safety Analyses for ITS 3.8.8, STS Bases markup pages B 3.8-84(80) and 85(81)** **Bases for Applicable Safety Analyses for STS 3.8.8**

The Bases for Applicable Safety Analyses for ITS 3.8.8 contains generic descriptive material that compares the requirements in Modes 5 and 6 with those in Modes 1, 2, 3, and 4. This is a proposed difference relative to Bases for Applicable Safety Analyses for corresponding STS 3.8.8.

Comment: No justification has been provided to support this proposed difference. Revise the submittal to provide the appropriate justification for the proposed difference or conform to the STS.

FLOG Response:

3.8.8-04 DCPP Bases for ITS LCO 3.8.8, STS Bases markup page B 3.8-144
Bases for STS LCO 3.8.8

The Bases for ITS LCO 3.8.8 states, "The resulting circuit is not required to be single failure resistant." This statement is a proposed difference relative to the Bases for corresponding STS LCO 3.8.8.

Comment: No justification has been provided to support this proposed difference. Revise the submittal to provide the appropriate justification for the proposed difference or conform to the STS.

FLOG Response:

3.8.8-05 DCPP JFD 3.8-35
ITS 3.8.8 Actions Note
STS 3.8.8 Actions

The Actions Note for ITS 3.8.8 states, "LCO 3.0.3 is not applicable." This is a proposed difference relative to the Actions for corresponding STS 3.8.8, and is a proposed change relative to the CTS. JFD 3.8-35 references TSTF-36.

Comment: TSTF-36 has not been approved yet. Revise JFD 3.8-35 to justify the proposed change or withdraw the proposed change.

FLOG Response:

3.8 Bases

3.8.B-01 Callaway

a. Bases Page 3.8-4

A paragraph is included at the bottom of the page which addresses the inoperability of DG ventilation supply fans.

Comment: While this statement may be acceptable, this appears to be the wrong place for its inclusion. This would be more appropriately addressed in Section 3.7 of the TS and Bases.

Response:

b. Bases Page 3.8-6

A proposed addition to the first paragraph includes a discussion of why the turbine driven auxiliary feedwater pump is not considered a redundant feature.

Comment: This discussion is not understood by the staff, especially in light of the fact that the pump is considered a redundant feature in Condition B and Required Action B.2. The Bases discussions for Conditions A & B are very similar. One discusses the potential loss of a DG when one train is without offsite power, and the other discusses the loss of offsite power when one DG is inoperable. Based on this, the staff does not understand why the turbine driven auxiliary feedwater pump can be considered a redundant feature in one case, but not the other. Some additional discussion is required. Condition A in the TS may also need revision.

Response:

c. Bases Page 3.8-12
Actions C.1 and C.2

The proposed addition to the Bases regarding the turbine driven auxiliary feedwater pump does not appear to be acceptable. Action C.1 assumes an event coincident with failure of one DG. In this case (no offsite available and the turbine driven auxiliary feedwater pump inoperable, adequate auxiliary feedwater would not be available. Consequently, the turbine driven auxiliary feedwater pump is a redundant required feature.

Comment: The Bases should be corrected. Action C.1 in the TS may also need some work.

Response:

d. Bases Page 3.8-25
SR 3.8.1.10 - Second Paragraph

SR 3.8.1.10 is a full load reject test with acceptance criteria expressed in terms of maximum voltage and frequency excursions. The proposed addition includes a discussion of voltage dip which is not applicable to this SR.

Comment: What is the purpose of adding a discussion of the ESW starting transient to this Bases section?

Response:

e. Bases Page 3.8-39
LCO 3.8.2

The Bases discussion specifically addresses "one train" of required loads being powered from offsite power. However, on the next page, the Bases include a discussion regarding the "second train" of AC electrical power distribution supporting redundant required features.

Comment: These two parts of the same Bases are not consistent with each other. Some correction is required. This also applies to TS LCO 3.8.2 as well as the TS and Bases for LCOs 3.8.5 and 3.8.8.

Response:

f. Bases Page 3.8-41

The proposed Bases addition regarding the Load Shedder and Emergency Load Sequencer (LSELS) only being required on the train supported by the OPERABLE DG does not appear to be acceptable. On the previous page, there is a discussion regarding a requirement for a "second train." Since the LSELS is an integral part of offsite power OPERABILITY, the LSELS would also have to be OPERABLE for the second train of required loads being powered from offsite power.

Comment: What is the "shutdown portion" of the LSELS? How does it differ from the rest of the LSELS?

Response:

g. Bases Page 3.8-41

The last paragraph in the LCO Bases addresses inoperability of the DG ventilation supply fans.

Comment: While this statement may be acceptable, this appears to be the wrong place for its inclusion. This would be more appropriately addressed in Section 3.7 of the TS and Bases.

Response:

h. Bases Page 3.8-42
Action A.1 and A.2

Deletion of the Bases statement regarding two trains being required by LCO 3.8.10 does not appear to be acceptable. The justification for retaining this statement is given in the discussion of a "second train" on Page B3.8-30.

Comment: Changing "all" to "one" in the first part of the Bases for Action A.2 also does not appear to be acceptable for the same reason the changes to A.1 are not acceptable.

Response:

i. Bases Page 3.8-50
Action E.1

The licensee should provide the basis for the values of starting air receiver pressure.

Comment: For example, why is a pressure of 610 psig in one receiver equivalent to two receivers with a pressure of 435 psig? Or, why is one receiver at 300 psig equal to two receivers at 250 psig?

Response:

j. Bases Page 3.8-57
LCO 3.8.4 Bases (5th paragraph)

Comment: What is the justification for deleting the Bases discussion on battery cell voltage and minimum battery voltage?

Response:

l. Bases Page 3.8-59
Action A1

Comment: What is the justification for deleting the Bases discussion on inoperable components (e.g., inoperable battery...)?

Response:

m. Bases Page 3.8-60
SR 3.8.4.1

Comment: TSTF 115 has not been approved. Retain CTS's 7 day frequency.

Response:

n. Bases Page 3.8-62
SP 3.8.4.5

Comment: What is the justification for deleting that part of the Bases dealing with connection resistance limits?

Response:

o. Bases Page 3.8-63
SR 3.8.4.6

Comment: See comment regarding the mode restriction Note for this SR. This Bases discussion may require revision.

Licensee Response:

p. Bases Page 3.8-65
SR 3.8.4.8

Comment: The proposed change to the definition of battery degradation is not acceptable. The change in battery capacity should be measured against the previous performance test, not against the average of the previous performance tests.

Response:

q. Bases Page 3.8-68
LCO 3.8.5

Comment: The Bases specifically state that one DC electrical power subsystem shall be OPERABLE. This is not consistent with the Bases for LCO 3.8.2 which indicates that a second train of AC electrical power may be required. If a second train of AC is required, a second train of DC for control power would also be required. This Bases should be revised to be consistent with the Bases for LCO 3.8.2.

Response:

r. Bases Page 3.8-70
Actions

Comment: Deletion of the first part of the Actions Bases does not appear to be acceptable. The deleted Bases material addresses the potential for requiring two trains of DC which may be

required if more than one train of safety equipment is required to be OPERABLE. See Bases for LCO 3.8.2.

Response:

s. Bases Page 3.8-74
Action B.1

Comment: What is the purpose of adding the sentence regarding representative cells to this Bases discussion?

Response:

t. Bases Page 3.8-76

Comment: The Category A limit for float voltage appears to be incorrect when viewed in light of the requirements of SR 3.8.4.1. This SR requires verifying that the battery float voltage is 130.2 VDC. For a 50 cell battery this equates to 2.17 volts per cell, and 2.24 volts per cell for a 58 cell battery. Is some correction required here as well as to Table 3.8.6-1?

Response:

u. Bases Page 3.8-77

Comment: How is float voltage corrected for electrolyte temperature?

Response:

v. Bases Page 3.8-86

Comment: The Bases specifically state that one train of inverters shall be OPERABLE. This is not consistent with the Bases for LCO 3.8.2 which indicates that a second Train of AC electrical power may be required. If a second train of AC is required, a second train of inverters for instrumentation and control would also be required. The Bases should be revised to be consistent with the Bases for LCO 3.8.2.

Response:

w. Bases Page 3.8-87
Actions

Comment: Deletion of the first part of the Actions Bases does not appear to be acceptable. The deleted Bases material addresses the potential for requiring two trains of inverters which may be required if more than one train of safety equipment is required to be OPERABLE. See Bases for LCO 3.8.2.

Response:

x. Bases Page 3.8-102

Comment: The proposed Bases additions regarding the "second" DC and vital AC electrical power distribution trains being powered from any available source do not appear to be acceptable. The reasons for this are (1) no justification has been provided for the proposed change, (2) LCOs 3.8.5 and 3.8.8 do not address a requirement for a second train, and (3) these Bases are not consistent with the Bases for LCO 3.8.5 and 3.8.8.

Response:

y. Bases Page 3.8-103
Actions

Comment: Deletion of the first part of the actions Bases does not appear to be acceptable. The deleted Bases material addresses the potential for requiring two trains of AC, DC, and Vital AC which may be required if more than one train of safety equipment is required to be OPERABLE. Deletion of this portion of the Bases makes it inconsistent with the Bases on the previous page which addresses electrical power sources to a second train of DC and Vital AC that may be required.

Response:

3.8.B-02 CPSES

a. Bases Page 3.8-5
Last paragraph

Comment: Delete the Bases with regard to single train systems and turbine-driven auxiliary feedwater pump. At Comanche Peak, the turbine-driven pump is a redundant required feature.

Response:

b. Bases Page 3.8-6
First paragraph

Comment: The second sentence seems to be incomplete.

Response:

c. Bases Page 3.8-10
First paragraph of C.1 and C.2

Comment: Delete the last sentence. The turbine-driven auxiliary feedwater pump is a redundant required feature at Comanche Peak.

Response:

d. Bases Page 3.8-18 (Comment also applies to related SR)
SR 3.8.1.6

Comment: The 92 day frequency is not justified. The frequency should be a function of how much fuel is consumed during a monthly surveillance and whether or not the transfer pump is required to operate to restore the day tank level.

Response:

e. Bases Page 3.8-19
SR 3.8.1.8, second paragraph

Comment: The Bases cannot modify the TS. The prohibition on performing this SR in Modes 1 and 2 is all inclusive, and cannot be negated by a Bases statement. This is an issue that must be resolved as part of TSTF-283. This Bases section must be revised; i.e., retain the NUREG discussion.

Response:

f. Bases Page 3.8-20
SR 3.8.1.9 discussion of Note

Comment: The Bases discussion is not acceptable; see the above similar comment for SR 3.8.1.8. Also, the discussion on unplanned events has no lead in; the Note regarding unplanned events was deleted from the SR. Also, the second part of the discussion regarding post maintenance testing is not acceptable.

Response:

g. Bases Page 3.8-21
SR 3.8.1.10, last paragraph

Comment: The Bases discussion is not acceptable. See similar comment for SR 3.8.1.8. (see item e. above).

Response:

h. Bases Page 3.8-23
SR 3.8.1.11, 3rd paragraph

Comment: The Bases discussion regarding performance of the SR in Modes 1, 2, 3, or 4 is not acceptable. In addition, the Bases discussion is incomplete. Something is missing between "manufactures recommendations" and "does not allow...".

What is the rationale for deleting the Bases discussion on subparts d and e of SR 3.8.1.12?

Response:

i. Bases Page 3.8-24
SR 3.8.1.12

Comment: The discussion regarding not prohibiting performance of this SR in Modes 1,2,3, or 4 to restore OPERABILITY is not acceptable. See comment on SR 3.8.1.8. Also, the last paragraph of this SR Bases is incomplete. Something is missing between "manufacture's recommendations" and "does not allow."

Response:

j. Bases Page 3.8-25
SR 3.8.1.13

Comment: The discussion regarding not prohibiting performance of this SR in Modes 1 or 2 to restore OPERABILITY is not acceptable. See comment on SR 3.8.1.8. (see item B3.8-05)

Response:

k. Bases Page 3.8-26
SR 3.8.1.14

Comment: What is the justification for deleting the Bases discussion on Power Factor? Also, the discussion regarding not prohibiting performance of this SR in Modes 1 or 2 to restore OPERABILITY is not acceptable. See comment on SR 3.8.1.8. (see item B3.8-05)

Response:

l. Bases Page 3.8-27
SR 3.8.1.16

Comment: The discussion regarding not prohibiting performance of this SR in Modes 1 or 2 to restore OPERABILITY is not acceptable. See comment on SR 3.8.1.8. (see item e. above).

Response:

m. Bases Page 3.8-28
SR 3.8.1.17

Comment: The discussion regarding not prohibiting performance of this SR in Modes 1, 2, 3, or 4 to restore OPERABILITY is not acceptable. See SR 3.8.1.8. (see item B3.8-05)

Response:

n. Bases Page 3.8-29
SR 3.8.1.18

Comment: The discussion regarding not prohibiting performance of this SR in Modes 1, 2, 3, or 4 to restore OPERABILITY is not acceptable. See comment on SR 3.8.1.1.8. (see item B3.8-05)

Response:

o. Bases Page 3.8-30
SR 3.8.1.19

Comment: The discussion regarding not prohibiting performance of this SR in Modes 1, 2, 3, or 4 to restore OPERABILITY is not acceptable. See comment on SR 3.8.1.8. (see item B3.8-05)

Response:

p. Bases Page 3.8-31
SRs 3.8.1.21 and 3.8.22

Comment: It appears that these SRs might be better located in Section 3.3 of the TS.

Response:

q. Bases Page 3.8-33
Applicable Safety Analysis

Comment: Deleting "during movement of irradiated fuel assemblies" is not acceptable.

Response:

r. Bases Page 3.8-36
Action A.1

Comment: With the proposed deletion, this Bases section is not compatible with the LCO Bases. The LCO Bases include a discussion about requiring a second train supported by an offsite circuit which is what the deleted material in the Action A.1 section is addressing. Deletion of this Bases material makes the two sections inconsistent. The NUREG Bases should be retained.

Response:

s. Bases Page 3.8-44
SR 3.8.3.3, first paragraph

Comment: What is the justification for deleting that part of this Bases section which addresses when the tests on new fuel should be conducted? Also, what is the justification for adding Saybolt viscosity?

Response:

t. Bases Page 3.8-51
SR 3.8.4.6

Comment: Deletion of the discussion on the SR Note does not appear to be acceptable. The Note regarding Mode restrictions should be retained with modifications to limit the restriction to the OPERABLE battery charger.

Response:

u. Bases Page 3.8-52
SR 3.8.4.6

Comment: Deletion of the discussion on the SR Note does not appear to be acceptable. The Note regarding Mode restrictions should be retained with modifications to limit the restriction to the OPERABLE battery charger.

Response:

v. Bases Page 3.8-53
SR 3.8.4.7, Last paragraph

Comment: The discussion regarding not prohibiting performance of this SR in Modes 1, 3, 3, or 4 to restore OPERABILITY is not acceptable. See comments on SR 3.8.1.8. (see item e. above).

Response:

w. Bases Page 3.8-54
SR 3.8.4.8

Comment: The discussion regarding not prohibiting performance of this SR in Modes 1, 2, 3, 4 to restore OPERABILITY is not acceptable. See comment on SR 3.8.1.8. (see item e. above).

Response:

x. Bases Page 3.8-57
LCO

Comment: This LCO is revised to specifically state that one subsystem is required to be OPERABLE to support one train of distribution systems required by LCO 3.8.10. This is not consistent with the Bases for LCO 3.8.2 wherein it states that a second train of AC electrical power distribution may be required to support redundant required systems. These redundant required systems in the second train will also require DC control power which, in turn, means that a second OC subsystem would be required to be OPERABLE. This inconsistency requires clarification with Bases changes, as necessary.

Response:

y. Bases Page 3.8-58
Actions

Comment: As proposed, the first paragraph of this Bases section does not read correctly. The NUREG allowance to declare required features inoperable is based on two trains being required with one of the trains inoperable. However, the NUREG discussion regarding multiple trains is deleted. In addition, the LCO specifically states the requirement to be one train.

Response:

z. Bases Page 3.8-63
Table 3.8.6-1, third paragraph

Comment: A sentence is added to the effect that float voltage is connected for average electrolyte temperature. What is the justification for this addition? How is the connection made? This allowance is not addressed in Table 3.8.6-1.

Response:

aa. Bases Page 3.8-66
LCO 3.8.7, Background

Comment: The Bases Background section is modified to delete reference to "an internal AC source/rectifier." However, the one line diagram for the uninterruptible AC shows an MCC feed to all of the inverters in both trains. What is the purpose of this AC feed to the inverters? Is the modified Bases correct? These questions are also applicable to the Bases changes in the third paragraph on Page 3.8-67.

Response:

bb. Bases Page 3.8-72
LCO 3.8.8

Comment: The Bases is modified to discuss a requirement to have only one train of vital AC OPERABLE. This is not consistent with the Bases for LCO 3.8.2 wherein it states that two trains of required features may need to be OPERABLE.

Response:

cc. Bases Page 3.8-73
Actions

Comment: The modified Bases are incorrect. The allowance to declare required features inoperable is based on a requirement to have more than one train of vital AC OPERABLE. The modified Bases deletes that part dealing with more than one train required OPERABLE, so the allowance to declare required features inoperable is not valid. The Bases should be revised accordingly.

Response:

dd. Bases Page 3.8-75
LCO 3.8.9, Background

Comment: Why are motor control centers and distribution panels deleted from the description of the AC electrical power subsystem? The licensee should provide a justification, or retain the NUREG language.

Response:

ee. Bases Page 3.8-76
LCO

Comment: Why are motor control centers and distribution panels deleted from the description of the AC electrical power subsystem? The licensee should provide a justification, or retain the NUREG language.

Response:

ff. Bases Page 3.8-77
Actions A.1

Comment: The proposed revision of the Bases is not acceptable. The staff has not accepted the generic change regarding loss of function and Action A.1. Also, why are bad centers, motor control centers, and distribution panels deleted from the Bases? The licensee should retain the NUREG Bases.

Response:

gg. Bases Page 3.8-79
Action B.1

Comment: The proposed revision to the Bases is not acceptable. The staff has not accepted the generic change regarding loss of function and Action B.1.

Response:

hh. Bases Page 3.8-80
Action C.1

Comment: The proposed revision to the Bases is not acceptable. The staff has not accepted the generic change regarding loss of function and actions.

Response:

ii. Bases Page 3.8-85
LCO 3.8.10, First paragraph

Comment: These Bases are not consistent with the Bases for LCO 3.8.2. The Bases for LCO 3.8.2 indicates that more than one train of required features may be required. These features would have to be supported by the associated AC distribution subsystems.

Fourth paragraph. The proposed Bases are not acceptable. They are not consistent with the Bases for LCO 3.8.5. In addition, no justification has been provided for the statement that the second AC vital bus may be "energized from any available source".

Response:

jj. Bases Page 3.8-86
Actions

Comment: Deletion of the first part of the first paragraph is not acceptable. This deletion makes the Actions Bases inconsistent with the LCO Bases which indicate a second train of AC, DC, and AC vital bus may be required. The Bases allowance to declare required features inoperable is based on two trains of electrical power being required. The proposed Bases disregards this but retains the allowance to declare required features inoperable. This is not acceptable.

Response:

3.8.B-03 DCPP

a. Bases Page 3.8-9
Action A.1

Comment: The proposed Bases discussion dealing with inoperable offsite power to one Class IE 4160 VAC bus does not appear to be acceptable. The purpose of conducting SR 3.8.1.1 on the remaining busses is to ensure that the cause of inoperability is not present and continues not to be present on the remaining offsite power sources. The Bases should be revised.

Response:

b. Bases Page 3.8-25

Comment: What is the justification for deleting the first paragraph of the discussion on Actions D.1 and D.2?

Response:

c. Bases Page 3.8-33
SR 3.8.1.2

Comment: The DGs are not capable of a modified start. Is it the licensee's intent to modify the DGs so they are capable of the modified start? If so, when is this modification to be made? The TS should reflect what exists, not what might exist. If the DG Modifications are not in the immediate future, this part of the TS and Bases should be deleted (i.e., that part dealing with modifications).

Response:

d. Bases Page 3.8.38
SR 3.8.1.6

Comment: What is the justification for deleting that part of the Bases which addresses automatic operation of the control system(s)?

Response:

e. Bases Page 3.8-41
SR 3.8.1.9

Comment: What is the justification for deleting that part of the Bases which addresses IEEE-303 and DG overspeed?

Response:

f. Bases Page 3.8-42
SR 3.8.1.9

Comment: What is the intent of adding the statement regarding LCO 3.0.5? Is this intended to be an exception to the Mode restriction on performance of this SR? If so, the proposed addition is not acceptable.

Response:

g. Bases Page 3.8-49
SR 3.8.1.12

Comment: What is the DCPP design with respect to a SI signal with offsite power available? Does the offsite power fast transfer from the auxiliary transformer to the 230 kv system via the start up transformers? If this is the design, it should be reflected in the Bases.

The last part of this SR Bases appears to be incorrect. The SR is to demonstrate that the DGs will start and run unloaded in the event of a SI signal with offsite power available. The Bases however, include a discussion of DG loading logic and OG loading. This is not appropriate for this SR and should be corrected.

Response:

h. Bases Page 3.8-59
SR 3.1.1.18

What is the difference/function between ESF timers and auto transfer timers?

Response:

i. Bases Page 3.8-65

Comment: Why is the last paragraph of the Bases section on DG Test Schedule retained for the DCPP Bases? Given that accelerated testing is deleted, this part of the Bases does not appear to be appropriate.

Response:

j. Bases Page 3.8-74
LCO

Comment: What is the purpose of retaining and modifying the Bases discussion on cross tied distribution subsystems? What cross tie capability exists at DCPP, especially with regard to the DGs?

Response:

k. Bases Page 3.8-84
LCO Note

The staff does not understand the Bases statement that "the Note would still allow separate Condition entry into a DG subsystem's Required Action coincident with Condition A." Condition A applies to all the DGs, and failure to comply with the Required Actions of Condition A will result in all three DGs being inoperable. How does this correspond to the above statement regarding separate Condition entry? Is some correction needed here?

Response:

l. Bases Page 3.8-90
SR 3.8.3.3

Comment: What is the justification for deleting that portion of the Bases dealing with the time between receipt of new fuel and conducting the acceptance tests?

Response:

m. Bases Page 3.8-109
SR 3.8.6

Comment: See comments regarding deletion of Mode restriction for this SR in the comments on TS LCO 3.8.4. Corresponding Bases changes will be required.

Response:

n. Bases Page 3.8-111
SR 3.8.4.7

The change to the Bases discussion regarding battery terminal voltage (i.e., adding "one minute") is not acceptable. The battery terminal voltage must remain above the minimum

specified for the service test for the duration of the modified performance discharge test up to the time of the service test.

Response:

o. Bases Page 3.8-118
LCO 3.8.5

Comment: The Bases includes a discussion regarding cross-ties between DC busses. There are no provisions for this in the DCPP CTS, and no such provisions are included in the ITS. Since this Bases discussion addresses a permissive that is not included in TS, it should be deleted from the Bases. Alternatively, the TS can be modified to allow cross-ties provided the allowance can be justified.

Response:

p. Bases Page 3.8-144
LCO 3.8.8

Comment: What is the meaning of the proposed bases addition which states "The resulting circuit is not required to be single failure resistant"? What is the justification for this proposed change? The Bases for LCO 3.8.7 include a definition of inverter OPERABILITY that is not consistent with the definition of OPERABILITY in the Bases for LCO 3.8.8.

Response:

q. Bases Page 3.8-155
Action A1

Comment: The proposed addition to the Bases regarding a loss of function not yet occurring is not acceptable and should be deleted from the Bases. Condition A and Action A.1 address one AC distribution subsystem inoperable, not multiple inoperabilities. The NUREG Bases should also be corrected to delete "or more" from the first sentence of Action A.1 Bases.

The Bases for LCO 3.8.7 include a definition of inverter OPERABILITY that is not consistent with the definition of OPERABILITY in the Bases for LCO 3.8.8.

Response:

r. Bases Page 3.8-157
Action B.1

Comment: The proposed addition to the Bases regarding a loss of function not yet occurring is not acceptable and should be deleted from the Bases Condition B and Action B.1 address one 120 vac vital bus inoperable, not multiple inoperabilites. Also, the addition of "or more" to the first sentence is not acceptable for the same reason.

Response:

s. Bases Page 3.8-161
Action C.1

Comment: The proposed addition to the Bases regarding a loss of function not yet occurring is not acceptable and should be deleted from the Bases. Condition C and Action C.1 address one DC power distribution subsystem inoperable, not multiple inoperabilities. Also, the addition of "or more" to the first sentence is not acceptable for the same reason.

Response:

3.8.B-04 WCGS

a. Bases Page 3.8-2
BACKGROUND

In the Background section, the licensee proposes to add a statement to the effect that a degraded voltage signal causes the normal and alternate offsite feeder breakers to open.

Comment: If this is the case, how can the 4.16KV bus in one train be aligned to the ESF transformer in the opposite train? Is the statement proposed for inclusion in the Bases correct, or is some revision required?

Response:

b. Bases Page 3.8-3
LCO

Comment: What is the justification for deleting the Bases material which addresses what qualified offsite circuits are?

Response:

c. Bases Page 3.8-6
ACTION A.2

Comment: The discussion for Action A.2 includes an addition regarding the turbine driven auxiliary feedwater pump not being a redundant feature. The staff does not agree with this addition. With the turbine driven auxiliary feedwater pump inoperable, an event coincident with a DG failure on the train with no offsite power would result in less than the required auxiliary feedwater pumps being available. Therefore, the turbine driven pump is a redundant feature for the purpose of this Action.

Response:

d. Bases Page 3.8-9
ACTION B.2

Comment: In the Action B.2 discussion regarding Completion Time, the phrase "and not in the safeguards position" is added to the paragraph dealing with a required feature on the other train inoperable. What does this phrase mean? Is some additional Bases discussion required?

Response:

e. Bases Page 3.8-12
ACTIONS C.1 and C.2

Comment: The proposed addition to the Bases discussion for Actions C.1 and C.2 regarding the turbine driven auxiliary feedwater pump not being a redundant required feature does not appear to be acceptable. See the staff comments on this issue for Action B.2. The Completion Time discussion for these Actions has the phrase "and not in the safeguards position" added. What does this phrase mean?

Response:

f. Bases Page 3.8-15
Action F.2

The proposed completion time for required Action F.2 does not appear to be appropriate. If the LSELS inoperability causes both the offsite and onsite power sources to the bus to be inoperable, this constitutes a dead bus. A dead bus invokes LCO 3.8.9 and its requirement to restore the bus to OPERABLE status in 8 hours. Should this Completion Time be changed. Also, consider that an inoperable LSELS renders both offsite circuits to the affected bus inoperable as well as the associated DG. Does this not constitute loss of 3 AC sources and entry into 3.0.3?

Comment: The licensee should address this question.

Response:

g. Bases Pages 3.8-19 and 3.8-20
SR 3.8.1.4 and SR 3.8.1.6

SR 3.8.1.4: What is the difference between SR 3.8.1.4 and SR 3.8.1.6? How can the fuel oil transfer pump start without transferring fuel? Also, the 92 day frequency for SR 3.8.1.6 is not acceptable.

Comment: The change from the CTS frequency of 31 days has not been justified. Note: The licensee should provide details of the fuel oil transfer system design and operation to support responses to these questions.

SR 3.8.1.6: A portion of STS NUREG is missing, the remaining is being deleted.

Comment: The licensee should provide a justification for deletion of this SR. The generic classification B-PS is not adequate. Similar comments on SR 3.8.1.4 and SR 3.8.1.6 for NUREG ITS markup.

Response:

h. Bases Page 3.8-20
SR 3.8.1.6

Comment: The frequency for this SR as stated in the Bases is 31 days. However, the frequency shown in the TS for this SR is 92 days. The TS and the Bases should agree. Since the CTS frequency for this SR is 31 days, it appears that the TS should be changed to be 31 days also.

Response:

i. Bases Page 3.8-25
SR 3.8.1.11

At the end of the Bases discussion on SR 3.8.1.11, the licensee has proposed to add "This does not prohibit the application of LCO 3.0.5".

Comment: What is the purpose of this addition? Is this Bases addition an attempt to modify the TS in some way? The licensee should provide a justification for adding this to the Bases.

Response:

j. Bases Pages 3.8-30, 31, and 32
SRs 3.8.1.17, 3.8.1.8, 3.8.1.19

Comment: The Bases discussion for SRs 3.8.1.17, 3.8.1.18, and 3.8.1.19 all include the statement regarding the application of LCO 3.0.5 that was included in the Bases for SR 3.8.1.11. SR 3.8.1.11 addresses a shutdown sequencer while SR 3.8.1.12 addresses a LOCA sequencer. What is the difference between the two sequencers? Are they both part of the LSELS which is covered by LCO 3.8.1, Condition F? (See also SR 3.8.1.18 for Load Shedder and Emergency Load Shedder).

Response:

k. Bases Page 3.8-37
LCO 3.8.2

The Bases discussion for LCO 3.8.2 is not consistent with the TS LCO 3.8.2. The TS LCO 3.8.2 requires one offsite source and one DG to support an electrical power distribution subsystem (singular) required by LCO 3.8.10. The Bases include a discussion about the offsite source supporting a second train of electrical power distribution subsystem, which makes it inconsistent with the TS.

Comment: The licensee should address this inconsistency.

Response:

l. Bases Page 3.8-39
ACTION A.1

Comment: The Bases discussion for Action A.1 is not consistent with the Bases discussion for the LCO. The NUREG Bases phrase "Although two trains are required by LCO 3.8.10" is deleted from the proposed Bases which creates the inconsistency. See comments on LCO Bases, above. The Bases discussion for Actions A.2.1, A.2.2, A.2.3, and A.2.4 is also not consistent with the LCO Bases because of changing "all" to "one".

Response:

m. Bases Page 3.8-48
SR 3.8.3.3

Comment: What is the justification for adding the material regarding API gravity and specific gravity to paragraph b. of the Bases discussion for SR 3.8.3.3?

Response:

n. Bases Page 3.8-49
SR 3.8.3.3

Comment: What is the justification for adding the material regarding sulphur analysis to the Bases discussion for SR 3.8.3.3?

Response:

o. Bases Page 3.8-57
SR 3.8.4.1 and SR 3.8.4.2

Comment: The change in frequency from 7 days to 31 days for SR 3.8.4.1 is not acceptable. The staff has rejected TSTF-115.

What is the justification for deleting the second paragraph of the discussion for SR 3.8.4.2?

Response:

p. Bases Page 3.8-58
SRs 3.8.4.4 and 3.8.4.5

Comment: What is the justification for deleting the third paragraph of the discussion for SRs 3.8.4.4 and 3.8.4.5?

Response:

q. Bases Page 3.8-59
SR 3.8.4.6

Comment: The third paragraph of the discussion for SR 3.8.4.6 is proposed to be deleted. The licensee should consider retaining the Mode restriction Note in a modified form; i.e., "This surveillance shall not be performed on the OPERABLE battery charger in Modes 1, 2, 3, or 4. The last paragraph of the Bases for SR 3.8.4.6 seems to be incorrect. The Note regarding credit for unplanned events is deleted from the SR.

Response:

r. Bases Page 3.8-61
SR 3.8.4.8

Comment: The proposed definition of degradation in the Bases for SR 3.8.4.8 is not acceptable. Degradation is measured relative to the previous performance test, not to the average of the previous performance tests. The licensee should revise the Bases accordingly.

Response:

s. Bases Page 3.8-64
LCO 3.8.5

Comment: The Bases for LCO 3.8.5 state that one DC electrical power subsystem is required to be OPERABLE. This is not consistent with the Bases for LCO 3.8.2 which states that, at times, two trains of AC electrical power distribution subsystems are required to be OPERABLE. The second AC train would require its associated DC subsystem to also be OPERABLE. It appears that some revision is required.

Response:

t. Bases Page 3.8-65
ACTIONS A.1, A.2.1, A.2.2, A.2.3, and A.2.4

Comment: What is the justification for deleting the first sentence in the Bases discussion for Actions A.1, A.2.1, A.2.2, A.2.3, and A.2.4? This appears to be a subset of the staff comment on LCO 3.8.5 Bases, above.

Response:

u Bases Page 3.8-74
Table 3.8.6-1

Comment: The proposed Bases discussion regarding footnotes to Table 3.8.6-1 is misleading with respect to the use of float current. As noted in staff comments on the TS, footnotes to Table 3.8.6-1, the use of float current as an alternative to specific gravity measurements is only applicable to Category A and Category C parameters. To meet Category B requirements, specific gravity measurements must be taken. Some revision to this Bases section is required.

Response:

v. Bases Page 3.8-82
LCO 3.8.8

Comment: The Bases for LCO 3.8.8 state that one train of AC vital bus electrical power distribution subsystem is required to be OPERABLE. This is not consistent with the Bases for LCO 3.8.2 which state that, at times, two trains of AC electrical power distribution subsystems are required to be OPERABLE. The second AC train would require its associated AC vital bus(es) also be OPERABLE. It appears that some revision is required.

Response:

w. Bases Page 3.8-83
ACTIONS A.1, A.2.1, A.2.2, A.2.3, and A.2.4

Comment: What is the justification for deleting the first sentence in the Bases discussion for Actions A.1, A.2.1, A.2.2, A.2.3, and A.2.4? This appears to be a subset of the staff comment on LCO 3.8.3 Bases, above.

Response:

x. Bases Page 3.8-88
ACTION A.1

Comment: In the Bases discussion for Action A.1, a statement regarding taking exception to LCO 3.0.2 is proposed to be added. What is the justification for this proposed addition?

Response:

y. Bases Page 3.8-94
Table 3.8.9-1

Comment: A footnote is added to Bases Table 3.8.9-1 which states that upon loss of 480 VAC load center NGO5E or NGO6E, the Required Actions of LCO 3.7.8 are entered. While this is acceptable in concept, it is a case of the Bases modifying a TS. This is not acceptable. The permissive to enter the actions of another LCO when the requirements of LCO 3.8.9 are not met must be included in the LCO TS proper. The Bases cannot be used to modify TS. A revision to LCO 3.8.9 is required.

Response:

z. Bases Page 3.8-98
ACTIONS A.1, A.2.1, A.2.2, A.2.3, A.2.4, and A.2.5

Comment: What is the justification for deleting the first sentence of the Bases discussion for Action A.1, A.2.1, A.2.2, A.2.3, A.2.4, and A.2.5?

Response:
