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ComEd

September 21, 1998

United States Nuclear Regulatory Commission
Attn: Document Control Desk
Washington D.C. 20555 - 0001

Subject: Commonwealth Edison's (ComEd's) Response to the NRC's Request for Additional Information (RAI) for Improved Technical Specifications (ITS) Section 3.3

Byron Nuclear Power Station, Units 1 and 2
Facility Operating Licenses NPF-37 and NPF-66
NRC Docket Numbers: 50-454 and 50-455

Braidwood Nuclear Power Station, Units 1 and 2
Facility Operating Licenses NPF-72 and NPF-77
NRC Docket Numbers: 50-456 and 50-457

References: G. Stanley and K. Graesser (ComEd) letter to USNRC, "Conversion to the Improved Standard Technical Specifications," dated December 13, 1996

The purpose of this letter is to transmit ComEd's Response to the NRC's RAI for ITS Section 3.3. The responses to the RAI questions are contained in the Attachment, Response to NRC RAI for ITS Section 3.3.

The RAI contains questions and comments stemming from the NRC's partial review of a ComEd request (Reference 1) to amend the Current Technical Specifications (CTS) for Byron Units 1 and 2 and Braidwood Units 1 and 2. The amendments were requested in order to adopt the Improved Technical Specifications of NUREG-1431, Revision 1.

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A001

As discussed with NRC Staff in an August 12, 1997 teleconference, this submittal does not include any replacement or CTS Markup pages. The required page changes and markups will be submitted at a later date when the NRC review and acceptance of ComEd's Response to this NRC RAI is complete.

Please address any comments or questions regarding this matter to our Nuclear Licensing Department.

Sincerely,

for

Timothy J. Tulon
Site Vice President
Braidwood Nuclear Generating Station

Attachment: Response to NRC RAI for ITS Section 3.3

cc: Regional Administrator - RIII
Senior Resident Inspector - Braidwood
Senior Resident Inspector - Byron
Office of Nuclear Facility Safety – IDNS

nrc/98058tjt.doc

Attachment

Byron / Braidwood
Response to NRC RAI for ITS Section 3.3
(Improved Technical Specification Submittal)

Response to NRC RAI For ITS Section 3.3

17-Sep-98

NRC RAI Number	NRC Issued Date	RAI Status
3.3.1-01	9/11/98	Open - ComEd Action Required

NRC Description of Issue

DOC L.26
CTS Table 3.3-1 Action 2.b
ITS LCO 3.3.1 Condition E

Discussion of Change L.26 states in one sentence that "The equivalent ITS Action ..... does not require these steps" whereas in the next sentence states that "these actions are necessary." This particular CTS Action is not included in the ITS as stated in the first part of the CTS DOC L.26. For the most part this change is justified. Comment: Review and revise DOC L.26 to eliminate conflicting statements.

ComEd Response to Issue

The word "not" was inadvertently omitted in the conflicting sentence. The sentence in CTS DOC 3.3-L26 was revised to state, "Since the Power Range Neutron Flux Rate Functions are not influenced by the power level, and do not impact the protection related to maintaining QPTR, these actions are not necessary." This change will be provided in our comprehensive ITS Section 3.3 closeout submittal revision upon NRC's concurrence with the ComEd Responses to the ITS Section 3.3 RAI.

NRC RAI Number	NRC Issued Date	RAI Status
3.3.1-02	9/11/98	Open - ComEd Action Required

NRC Description of Issue

CTS Table 2.2.1 Functional Unit 19.a
ITS Table 3.3.1-1 Function 17.a
STS Table 3.3.1-1 Function 18.a
ITS Table 3.3.1-1 Note c.
STS Table 3.3.1-1 Note d.
ITS Table 3.3.1-1 Note d.
STS Table 3.3.1-1 Note e.

The CTS references the term "Intermediate Range Neutron Flux, P-6" in the Tables and in associated Notes. The corresponding P-6 in the ITS has been changed to "Source Range Block Permissive" without supporting DOC. Comments: Provide specific DOC for the change in terminology from Intermediate Range Neutron Flux P-6 to Source Range Block Permissive P-6.

ComEd Response to Issue

In the CTS Markups, the generic CTS DOC 3.3-A1 was changed to a specific CTS 'A' DOC and states, "CTS and STS use the term "Intermediate Range Neutron Flux" for the P-6 RTS interlock. In ITS, the P-6 interlock is referred to as "Source Range Block Permissive." This change was made so that the TS agree with plant design and terminology. The Byron/Braidwood Main Control Room annunciator and Bypass Permissive Panel windows, as well as plant procedures, reference "Source Range Block Permissive" for the P-6 interlock. This change is considered editorial in nature and does not involve a technical change (either actual or interpretational) to the TS." This change will be provided in our comprehensive ITS Section 3.3 closeout submittal revision upon NRC's concurrence with the ComEd Responses to the ITS Section 3.3 RAI.

NRC RAI Number	NRC Issued Date	RAI Status
3.3.1-03	9/11/98	Open - ComEd Action Required

NRC Description of Issue

CTS Table 2.2.1 Functional Unit 19.b 1) and 2) "Allowable Value"
ITS Table 3.3.1-1 Function 17.a
STS Table 3.3.1-1 Function 18.a

CTS Table 2.2-1 Functional Unit 19.a Items 1) and 2) Allowable Values is not retained in the ITS. There is no DOC to support the deletion of these items. Comment: Revise submittal to either include these Allowable Values in the ITS or provide DOC to support the deletion.

ComEd Response to Issue

An 'A' DOC was written and states, "CTS Table 2.2-1 for Functional Unit 19.b (P-7) lists the inputs into P-7, namely Functional Unit 19.b.1 (P-10) and Functional Unit 19.b.2 (P-13). Functional Unit 19.b.1 and Functional Unit 19.b.2 have been deleted since they are redundant to CTS Table 2.2-1 Functional Units 19.d (P-10) and 19.e (P-13). The Allowable Values in CTS Table 2.2-1 for Functional Unit 19.d and Functional Unit 19.e have been retained in ITS Table 3.3.1-1 for Function 17.d (P-10) and Function 17.e (P-13). During this reformatting, no technical changes (either actual or interpretational) were made to the TS unless they were identified and justified. The change is consistent with NUREG-1431." This change will be provided in our comprehensive ITS Section 3.3 closeout submittal revision upon NRC's concurrence with the ComEd Responses to the ITS Section 3.3 RAI.

NRC RAI Number	NRC Issued Date	RAI Status
3.3.1-04	9/11/98	Open - ComEd Action Required

NRC Description of Issue

CTS Table 2.2.1 Note 1
ITS Table 3.3.1-1 Note 1
STS Table 3.3.1-1 Note 1

Item P' in the CTS Table 2.2.1 Note 1 is defined by using the "=" sign. The same item in the ITS Table 3.3.1-1 Note 1 is defined by using the " " with no supporting DOC. Comment: Revise submittal to either include the "=" in the ITS or provide DOC to support the change.

ComEd Response to Issue

The "greater than or equal to" sign for P' in ITS Table 3.3.1-1 was changed to the "equal" sign, consistent with Current Licensing Basis in CTS Table 2.2-1. This change will be provided in our comprehensive ITS Section 3.3 closeout submittal revision upon NRC's concurrence with the ComEd Responses to the ITS Section 3.3 RAI.

NRC RAI Number	NRC Issued Date	RAI Status
3.3.1-05	9/11/98	Open - ComEd Action Required

NRC Description of Issue

CTS Table 4.3-1 Functional Unit 17 and 18
ITS Table 3.3.1-1 Function 11 and 16
CTS Table 4.3-1 Note 10
ITS SR 3.3.1.13 Note
STS SR 3.3.1.14 Note

The Note in the ITS SR 3.3.1.13 which states that "Verification of setpoint is not required" is not used in the CTS SR. CTS Table 4.3-1 Functional Unit 17 and 18 does not reference CTS Table 4.3-1 Note 10 which in other cases would provide exception to the verification of setpoints. There is no DOC to support this less restrictive change. Comment: Revise submittal to provide DOC to support this less restrictive change.

ComEd Response to Issue

An 'L' DOC was written and states, "CTS Table 4 3-1 for Functional Units 1, 17, and 18 for Manual Reactor Trip, SI Input from ESF, and RCP Breaker Position Trip, respectively, requires a TADOT be performed every refueling. ITS has added a Note to SR 3.3.1.13, the 18 month TADOT, to exclude verification of setpoints from the TADOT. This change is acceptable since the affected Functions have no setpoints associated with them. This change is consistent with NUREG-1431." This change will be provided in our comprehensive ITS Section 3.3 closeout submittal revision upon NRC's concurrence with the ComEd Responses to the ITS Section 3.3 RAI.

NRC RAI Number	NRC Issued Date	RAI Status
3.3.1-06	9/11/98	Open - ComEd Action Required

NRC Description of Issue

DOC A.11
CTS SR 4.3.1.2
ITS Table 3.3.1-1 Function 2.a, 2.b, 3.b, 5, 6, 7, 8.a, 8.b, 10, 12 ,13, and 14
ITS SR 3.3.1.15 Note
STS SR 3.3.1.16 Note

The Note in the ITS SR 3.3.1.15 which states that "Neutron detectors are excluded from response time testing" is not used in the CTS SR 4.3.1.2. DOC A.11, CTS Table 4.3-1 Functional Units or CTS Table 4.3-1 Table Notations do not provide exceptions to Neutron detection response time testing. There is no DOC to support this less restrictive change. Comment: Revise submittal to provide DOC to support this less restrictive change.

ComEd Response to Issue

An 'L' DOC was written and states, "CTS SR 4.3.1.2 requires a Response Time test be performed at least once per 18 months for each reactor trip function. ITS has added a Note to SR 3.3.1.15, the 18 month staggered RTS Response Time surveillance, to exclude the neutron detectors from response time testing. This Note is necessary because of the difficulty in generating an appropriate detector input signal. Excluding the detectors is acceptable because the principles of detector operation ensure a virtually instantaneous response. This change is consistent with NUREG-1431." This change will be provided in our comprehensive ITS Section 3.3 closeout submittal revision upon NRC's concurrence with the ComEd Responses to the ITS Section 3.3 RAI.

NRC RAI Number	NRC Issued Date	RAI Status
3.3.1-07	9/11/98	Open - NRC Action Required

NRC Description of Issue

JFD C.7
ITS BASES SR 3.3.1.15 Insert B 3.3-59A
ITS BASES SR 3.3.2.11 Insert B 3.3-119A
STS BASES SR 3.3.1.16
STS BASES SR 3.3.2.10

The ITS BASES for SR 3.3.1.15 and SR 3.3.2.11 have adopted TSTF-111. At this time, TSTF-111 has not been approved by the NRC and, in addition, Insert B 3.3-59A and Insert B 3.3-119A for the ITS does not contain the latest information discussions/revisions. These latest revisions relating to TSTF-111 are addressed in a memo from Dr. W. Beckner (NRC) to Mr. Davis (NEI) dated 17 August 1998. Comment: Revise submittal to either use the STS without TSTF-111 or adopt TSTF-111 (with the latest revisions) with the assumption that it (TSTF-111) will be adopted by the industry prior to issuance of COMED's TS amendment SE.

ComEd Response to Issue

No change. ComEd has adopted TSTF-111, Revision 0, which was approved by the NRC on March 13, 1997. ComEd is aware of the William Becker (NRC) to Mr. Davis (NEI) letter dated August 17, 1998 dispositioning changes to the STS made by the NEI Technical Specification Task Force (TSTF). The disposition of TSTF-111, Revision 1, was "modify." ComEd has reviewed proposed TSTF-111, Revision 2, and has found that it conflicts with the August 17, 1998 letter. Therefore, until these differences are resolved and a subsequent revision of TSTF-111 approved, ComEd continues to pursue the changes associated with NRC approved TSTF-111, Revision 0 (Bases JFD 3.3-C7).

NRC RAI Number	NRC Issued Date	RAI Status
3.3.3-01	9/11/98	Open - ComEd Action Required

NRC Description of Issue

JFD P26
ITS 3.3.3, PAM Instrumentation
ITS Table 3.3.3-1

The proposed ITS 3.3.3 PAM TS needs to be revised. Specifically, the following areas need to be modified:
1) The proposed Condition A is not general enough to encompass all of the conditions in Table 3.3.3-1. Suggest that Condition A be revised, similar to Condition A in TS 3.3.1 and TS 3.3.2, to read: "One or more functions with one or more required channels inoperable."
2) Proposed Condition B should read as proposed Condition A currently reads.
3) The Note to Condition E, declaring it not applicable to Function 15, is incorrectly discussed in the Bases as being a Note to Condition D.
Comment: Revise the submittal.

ComEd Response to Issue

Item a: ITS LCO 3.3.3 Condition A will be revised, similar to Condition A in ITS LCO 3.3.1 and ITS LCO 3.3.2, to read, "One or more functions with one or more required channels inoperable."
Item c: On page B 3.3-135 in the Bases Markups, the ACTIONS Section of the Bases for ITS LCO 3.3.3 (Actions D.1 and E.1) will be revised to state, "Condition E is modified by a Note that excludes hydrogen monitor channels." These changes will be provided in our comprehensive ITS Section 3.3 closeout submittal revision upon NRC's concurrence with the ComEd Responses to the ITS Section 3.3 RAI.

Item b: No change. ComEd disagrees that the proposed Condition B should read as the proposed (old) Condition A currently reads. The new Condition A will read, "One or more functions with one or more required channels inoperable." The new Condition A will encompass the old Condition A, and therefore the old Condition A does not need to be changed to Condition B. This is consistent with ITS LCOs 3.3.1 and 3.3.2. ComEd continues to pursue this change.

NRC RAI Number	NRC Issued Date	RAI Status
3.3.4-01	9/11/98	Open - ComEd Action Required

NRC Description of Issue

JFD P29 and DOC LA23
STS Table 3.3.4-1 and ITS Bases Table B 3.3.4-1
CTS Table 3.3-9

Information in CTS Table 3.3-9 and STS Table 3.3.4-1, listing "Required Number of Channels," similar to information that is retained in other ITS 3.3 sections, has been moved to ITS Bases Table B 3.3.4-1. Comment: Since this information/table is in the CTS and the STS, and similar information has been retained in tables in other ITS 3.3 sections, retain Table 3.3.4-1 in the ITS.

ComEd Response to Issue

ComEd will withdraw the plant specific change of relocating the RSD table to the ITS Bases in accordance with "NRC pending" TSTF-266. Table 3.3.4-1 will be retained in ITS LCO 3.3.4. LCO and Bases JFDs 3.3-P29 will be deleted. This change will be provided in our comprehensive ITS Section 3.3 closeout submittal revision upon NRC's concurrence with the ComEd Responses to the ITS Section 3.3 RAI.

NRC RAI Number	NRC Issued Date	RAI Status
3.3.4-02	9/11/98	Open - NRC Action Required

NRC Description of Issue

JFD P30
STS SR 3.3.4.2 and STS SR 3.3.4.4

The STS includes SR 3.3.4.2 and SR 3.3.4.4 to confirm the operability of the Remote Shutdown System, not merely its instrumentation, as P30 indicates the CTS does. The ITS does not include these SRs. Comment: Include STS SR 3.3.4.2 and STS SR 3.3.4.4 in the ITS to adequately confirm the operability of the Remote Shutdown System.

ComEd Response to Issue

No change. As discussed in LCO and Bases JFDs 3.3-P30, it is not Byron/Braidwood Current Licensing Basis (CLB) to include control function in CTS 3.3.3.5, only instrumentation function. ComEd, therefore, continues to pursue this change based on CLB.

NRC RAI Number	NRC Issued Date	RAI Status
3.3.5-01	9/11/98	Open - ComEd Action Required

NRC Description of Issue

JFD P54
ITS 3.3.5, Editorial Change

The word "if" has been added to Required Action C.1, "to be consistent with changes in section 3.7." Comment: The addition of "if" does not add clarity, and might add confusion. Suggest deleting the word "if" from sections 3.3.5 and 3.7, for clarity and consistency.

ComEd Response to Issue

The Note will be revised to adopt the STS wording. This change will be provided in our comprehensive ITS Section 3.3 closeout submittal revision upon NRC's concurrence with the ComEd Responses to the ITS Section 3.3 RAI. (See RAIs 3.4.14-02, 3.6.2-02, 3.6.3-03, 3.7.7-04, 3.7.8-06, and 3.8.1-22.)

NRC RAI Number	NRC Issued Date	RAI Status
3.3.6-01	9/11/98	Open - NRC Action Required

NRC Description of Issue

JFD C4 and DOC L18
STS 3.3.6 Applicability
ITS Table 3.3.6-1

In the STS the applicability is explicitly stated in the Applicability section of the TS, while in the ITS the applicability is referred to on Table 3.3.6-1. Comment: The ITS applicability is incorrect on Table 3.3.6-1, in that it does not have footnotes to include the conditions "During CORE ALTERATIONS," and "During movement of irradiated fuel assemblies within containment." Correct the applicability on ITS Table 3.3.6-1.

ComEd Response to Issue

No change. ITS Table 3.3.6-1 Functions 1, 2, and 5 refer to LCO 3.3.2 for all initiation functions and requirements. Therefore, footnotes are not required for Functions 1, 2, and 5.

The Applicability for Function 3, Automatic Actuation Logic and Actuation Relays, is MODES 1, 2, 3, and 4. This is consistent with CTS Table 3.3-3 Functional Unit 3.c.3 Applicability of MODES 1, 2, 3, and 4 on CTS Markup page 3/4 3-16. Therefore, by maintaining Current Licensing Basis (CLB), footnotes are not required for Function 3.

As justified by CTS DOC 3.3-L18, the CTS Applicability of "All" has been changed in ITS for Function 4, Containment Radiation - High, to MODES 1, 2, 3, and 4, and when Item C.2 of LCO 3.9.4 is required. The Applicability for ITS LCO 3.9.4 is "During CORE ALTERATIONS, During movement of irradiated fuel assemblies within containment." Therefore, footnotes are not required for Function 4. ComEd continues to pursue this change based on CLB.

NRC RAI Number	NRC Issued Date	RAI Status
3.3.6-02	9/11/98	Open - NRC Action Required

NRC Description of Issue

JFD P34
STS 3.3.6 Condition B
ITS 3.3.6 Condition B

The ITS deletes the STS reference to manual functions in ITS 3.3.6 Condition B.
Comment: Why? Can't the system be manually actuated? Include if appropriate.

ComEd Response to Issue

No change. The Byron/Braidwood plant specific design does not contain a Containment Ventilation Isolation - Manual Initiation function. Therefore, LCO JFD 3.3-P34 is correct in deleting this reference. ComEd continues to pursue this change based on Current Licensing Basis. (See RAI 3.3.6-03.)

NRC RAI Number	NRC Issued Date	RAI Status
3.3.6-03	9/11/98	Open - NRC Action Required

NRC Description of Issue

JFD P34
STS SR 3.3.6.6
CTS Table 4.3.2

The CTS includes TADOT surveillances of Manual Initiation capabilities of Containment Ventilation Isolation in CTS Table 4.3.2. The STS includes this surveillance as SR 3.3.6.6. The ITS deletes this SR. Comment: Why? Include STS SR 3.3.5.6 in the ITS.

ComEd Response to Issue

No change. The Byron/Braidwood plant specific design does not contain a Containment Ventilation Isolation - Manual Initiation function. Therefore, LCO JFD 3.3-P34 is correct in deleting the corresponding SR, STS SR 3.3.6.6, for performing a TADOT on this function. However, the SR for performing an 18 month TADOT on Containment Ventilation Isolation from a Manual Initiation of Phase A and a Manual Initiation of Phase B is addressed by ITS SR 3.3.2.9. ComEd continues to pursue this change based on Current Licensing Basis. (See RAI 3.3.6-02.)

NRC RAI Number	NRC Issued Date	RAI Status
3.3.6-04	9/11/98	Open - NRC Action Required

NRC Description of Issue

DOC L12
ITS 3.3.6
CTS Table 3.3-6

DOC L12 explains that the CTS requires immediate closure of containment purge valves whenever a radiation monitoring channel is inoperable, while the ITS allows 8 hours to place the valves in the closed position. Comment: It appears to this reviewer that the ITS (and STS) allow 4 hours to close the containment purge valves, not 8 hours. Explain how 8 hours is allowed. Correct DOC L12 if appropriate.

ComEd Response to Issue

One radiation monitoring channel inputs into train 'A' of Containment Ventilation Isolation Instrumentation, while the other channel inputs into train 'B' of Containment Ventilation Isolation Instrumentation. With one radiation monitoring channel inoperable, one of two CIVs is affected per penetration. With the unit in MODE 1, 2, 3, or 4, ITS LCO 3.3.6 Condition A for one radiation monitoring channel inoperable allows 4 hours to restore the affected channel to OPERABLE status. If the Required Action and associated Completion Time of Condition A is not met, Condition B requires immediately entering the applicable Conditions and Required Actions of LCO 3.6.3 for containment purge valves made inoperable by Containment Ventilation Isolation Instrumentation. ITS LCO 3.6.3 Condition A, for one inoperable CIV, requires that the affected penetration flow path be isolated within 4 hour. Thus a total of 8 hours would be allowed to place the valves (one CIV per penetration) in the closed position whenever one radiation monitoring channel is inoperable.

NRC RAI Number	NRC Issued Date	RAI Status
3.3.7-01	9/11/98	Open - NRC Action Required

NRC Description of Issue

JFD C4
STS 3.3.7 Applicability
ITS Table 3.3.7-1

In the STS the applicability is explicitly stated in the Applicability section of the TS, while in the ITS the applicability is referred to on Table 3.3.7-1. Comment: The ITS applicability is incorrect on Table 3.3.7-1, in that it does not have a footnote to include the condition "During CORE ALTERATIONS" on ITS Table 3.3.7-1.

ComEd Response to Issue

No change. ITS Table 3.3.7-1 Applicability for Function 1, Control Room Radiation - Gaseous, is MODES 1, 2, 3, 4, 5, and 6, and during movement of irradiated fuel assemblies. The ITS definition for CORE ALTERATIONS states in part, "CORE ALTERATION shall be the movement of any fuel, sources, or reactivity control components, within the reactor vessel with the vessel head removed and fuel in the vessel." Since the definition of MODE 6 is one or more reactor head closure bolts less than fully tensioned (and fuel in the vessel), CORE ALTERATIONS is encompassed in the MODE 6 Applicability. Therefore, the footnote is not required for Function 1.

Function 2 refers to LCO 3.3.2 for all initiation functions and requirements. Therefore, the footnote is not required for Function 2. ComEd continues to pursue this change. (See RAI 3.3.6-01.)

NRC RAI Number	NRC Issued Date	RAI Status
3.3.7-02	9/11/98	Open - NRC Action Required

NRC Description of Issue

JFD P38
STS SR 3.3.7.3, STS SR 3.3.7.4, STS SR 3.3.7.5, and , STS SR 3.3.7.6

STS SR 3.3.7.3, STS SR 3.3.7.4, STS SR 3.3.7.5, and , STS SR 3.3.7.6 have not been included in the ITS based on their absence in the CTS (to reflect plant specific functions ...).
Comment: Explain why the deleted STS surveillances do not confirm the operability of the VC Filtration System Actuation Instrumentation. Include surveillances as appropriate.

ComEd Response to Issue

No change. STS was revised to delete the SRs based on Current Licensing Basis (CLB). ComEd agrees that the deleted SRs provide additional verification of operability of the VC Filtration System Actuation Instrumentation. However, CTS provides adequate operability verification for the same actuation instrumentation. In addition, ITS SRs 3.3.2.4, 3.3.2.5, 3.3.2.7, and 3.7.10.3 provide the same operability verification as STS SRs 3.3.7.3, 3.3.7.4, 3.3.7.5, and 3.3.7.6. ComEd continues to pursue this change based on CLB. (See RAI 3.3.8-02.)

NRC RAI Number	NRC Issued Date	RAI Status
3.3.8-01	9/11/98	Open - NRC Action Required

NRC Description of Issue

JFD P40
ITS 3.3.8 Required Action B.1

ITS 3.3.8 Required Action B.1 states to "Place in emergency mode one FHB Ventilation System Train capable of being powered by an OPERABLE emergency power source."
Comment: Explain why the phrase "capable of being powered by an OPERABLE emergency power source" is necessary for this required action. The status of support systems is not generally stipulated in action statements.

ComEd Response to Issue

No change. The requirement to have the FHB ventilation capable of being powered by an OPERABLE emergency power source is a CTS requirement. The rationale behind this requirement is that the FHB ventilation is credited for mitigating a fuel handling accident in the FHB. It is recognized that this could occur independent of unit operation, and could potentially occur when the normal emergency power source for the affected bus is out of service for overhaul. This additional requirement allows utilization of the unit crosstie feature to align the affected bus to the opposite unit's diesel generator, thus providing an alternate source of AC power. ComEd continues to pursue this change.

NRC RAI Number	NRC Issued Date	RAI Status
3.3.8-02	9/11/98	Open - NRC Action Required

NRC Description of Issue

JFD P40
STS 3.3.8 SR 3.3.8.3 and STS 3.3.8 SR 3.3.8.4

STS 3.3.8 SR 3.3.8.3 and STS 3.3.8 SR 3.3.8.4 have not been included in the ITS based on their absence in the CTS (to reflect plant specific functions ...).
Comment: Explain why the deleted STS surveillances do not confirm the operability of the FBACS Actuation Instrumentation. Include surveillances as appropriate.

ComEd Response to Issue

No change. STS was revised to delete the SRs based on Current Licensing Basis (CLB). ComEd agrees that the deleted SRs provide additional verification of operability of the FHB Ventilation System Actuation Instrumentation. However, CTS provides adequate operability verification for the same actuation instrumentation. In addition, ITS SRs 3.3.2.4 and 3.7.13.4 provide the same operability verification as STS SRs 3.3.8.3 and 3.3.8.4. ComEd continues to pursue this change based on CLB. (See RAI 3.3.7-02.)

Bottom of Report