

March 5, 1998

Mr. William T. Cottle
President and Chief Executive Officer
STP Nuclear Operating Company
South Texas Project Electric
Generating Station
P. O. Box 289
Wadsworth, TX 77483

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON PROPOSED CONVERSION
TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS, SOUTH
TEXAS PROJECT, UNITS 1 AND 2 (STP) (TAC NOS. M95529 AND M95530)

Dear Mr. Cottle:

The Nuclear Regulatory Commission staff is reviewing STP Nuclear Operating Company's (STPNOC's) proposed license amendment to convert to the format of the Improved Standard Technical Specifications. STPNOC provided a major supplement to the proposed license amendment (Supplement 1) by letter dated July 22, 1997.

The staff has reviewed selected portions of the application and its supplements. Based on its review, the staff has determined that additional information is needed, as discussed in the enclosure.

Sincerely,

ORIGINAL SIGNED BY:
Thomas W. Alexion, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure: As stated

cc w/encl: See next page

DISTRIBUTION:

Docket File	PUBLIC	PD4-1 r/f
EAdensam (EGA1)	JHannon	CHawes
TAlexion	OGC	ACRS
TGwynn, RIV	WBeckner	

1/1
OFC1

Document Name: STP95529.RAI

OFC	PM/PD4-1	LA/PD4-1	BC/TSB	PD/PDIV-1
NAME	TAlexion	CHawes	WBeckner	JHannon
DATE	3/1/98	3/4/98	3/5/98	3/5/98
COPY	YES/NO	YES/NO	YES/NO	YES/NO

OFFICIAL RECORD COPY

9803110345 980305
PDR ADOCK 05000498
P PDR



NRC FILE CENTER COPY



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20585-0001

March 5, 1998

Mr. William T. Cottle
President and Chief Executive Officer
STP Nuclear Operating Company
South Texas Project Electric
Generating Station
P. O. Box 289
Wadsworth, TX 77483

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION ON PROPOSED CONVERSION
TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS, SOUTH
TEXAS PROJECT, UNITS 1 AND 2 (STP) (TAC NOS. M95529 AND M95530)

Dear Mr. Cottle:

The Nuclear Regulatory Commission staff is reviewing STP Nuclear Operating Company's (STPNOC's) proposed license amendment to convert to the format of the Improved Standard Technical Specifications. STPNOC provided a major supplement to the proposed license amendment (Supplement 1) by letter dated July 22, 1997.

The staff has reviewed selected portions of the application and its supplements. Based on its review, the staff has determined that additional information is needed, as discussed in the enclosure.

Sincerely,

A handwritten signature in black ink that reads "Thomas W. Alexion".

Thomas W. Alexion, Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket Nos. 50-498 and 50-499

Enclosure: As stated

cc w/encl: See next page

Mr. William T. Cottle
STP Nuclear Operating Company

South Texas, Units 1 & 2

cc:

Mr. David P. Loveless
Senior Resident Inspector
U.S. Nuclear Regulatory Commission
P. O. Box 910
Bay City, TX 77414

A. Ramirez/C. M. Canady
City of Austin
Electric Utility Department
721 Barton Springs Road
Austin, TX 78704

Mr. M. T. Hardt
Mr. W. C. Gunst
City Public Service Board
P. O. Box 1771
San Antonio, TX 78296

Mr. G. E. Vaughn/C. A. Johnson
Central Power and Light Company
P. O. Box 289
Mail Code: N5012
Wadsworth, TX 74483

INPO
Records Center
700 Galleria Parkway
Atlanta, GA 30339-3064

Regional Administrator, Region IV
U.S. Nuclear Regulatory Commission
611 Ryan Plaza Drive, Suite 400
Arlington, TX 76011

D. G. Tees/R. L. Balcom
Houston Lighting & Power Co.
P. O. Box 1700
Houston, TX 77251

Judge, Matagorda County
Matagorda County Courthouse
1700 Seventh Street
Bay City, TX 77414

Jack R. Newman, Esq.
Morgan, Lewis & Bockius
1800 M Street, N.W.
Washington, DC 20036-5869

Mr. Lawrence E. Martin
Vice President, Nuc. Assurance & Licensing
STP Nuclear Operating Company
P. O. Box 289
Wadsworth, TX 77483

Office of the Governor
ATTN: John Howard, Director
Environmental and Natural
Resources Policy
P. O. Box 12428
Austin, TX 78711

Jon C. Wood
Matthews & Branscomb
One Alamo Center
106 S. St. Mary's Street, Suite 700
San Antonio, TX 78205-3692

Arthur C. Tate, Director
Division of Compliance & Inspection
Bureau of Radiation Control
Texas Department of Health
1100 West 49th Street
Austin, TX 78756

Jim Calloway
Public Utility Commission of Texas
Electric Industry Analysis
P. O. Box 13326
Austin, TX 78711-3326

Generic #1 DOC M4 and JFD #5 & #6
ITS 3.5.2, Action A and B, Completion Times
DOC M7 and JFD #11
ITS 3.6.6, Action A and B, Completion Times

CTS 3.5.2 and CTS 3.5.6 have been combined into ITS 3.5.2. CTS 3.6.2.1 and CTS 3.6.2.3 have been combined into ITS 3.6.6. Now, ITS 3.5.2 and 3.6.6 have separate Actions A and B for two different non-related systems inoperable. These situations do not appear to be covered under Section 1.3, Example 1.3-3 which attempts to limit the time spent in the respective actions because there is no Action in either ITS 3.5.2 or 3.6.6 which corresponds to Action C in Example 1.3-3.

Comment: STP is to explain in detail the operational "maneuvering" which occurs between Actions for ITS 3.5.2 as is discussed in DOC M4 and the limiting of "serial entries" as discussed in DOC M7 for ITS 3.6.6. Provide explicit examples. Provide this for each LCO where this example is applied. In addition, explain which Action of the LCO relates directly to the respective Actions A, B and C of the Example 1.3-3.

STP Response:

Generic #2 DOC L17 - CTS 4.5.6.1
JFD #5 - ITS SR 3.5.2.3
DOC A27 - CTS 4.6.2.1.a
JFD #5 - ITS SR 3.6.6.4
DOC L25 - CTS 4.7.7.b and CTS 4.7.7.e.3
JFD #20 - ITS SR 3.7.11.1 & SR 3.7.11.4
DOC L20 - CTS 4.7.8.a and 4.7.8.d.3; CTS 4.9.12.a and 4.9.12.d.3
JFD #5 - ITS SR 3.7.12.1 & 4; and ITS SR 3.7.13.1 & 4

ITS 3.5.2, 3.6.6, 3.7.11, 3.7.12 and 3.7.13 contain STAGGERED TEST BASIS requirements which have changed as a result of the adaptation of the two train STS to the three-train STP design. The CTS 1.35, STAGGERED TEST BASIS is changed significantly by the STAGGERED TEST BASIS revised definition in the STS. These changes have resulted in the identification of new frequency intervals that can not be determined to match the revised STAGGERED TEST BASIS definition.

Comment: Each application of the new STAGGERED TEST BASIS definition must be evaluated to determine if it is more frequent, less frequent or the same. STP is requested to provide the following for each situation. 1) State the current test cycles per train as derived directly from the CTS requirements; 2) If the specific number of days interval is not stated, and it is in accordance with CTS 4.0.5, then state the interval from the ASME code and identify the applicable code section.; 3) State the test cycles per train as derived directly from the STS requirements; 4) State the test cycles per train as derived directly from the proposed ITS requirements. Using DOC L17 as an example, use the format shown on page 7 in the STPEGS February 11, 1997 letter, #ST-HL-AE-5571. DOC L17 describes the addition of a fourth Train D in order to make the testing fit a 12-week cycle. A 12-week cycle is equally divisible by three as it is by four, so please explain what is this fourth train? Please provide the instrumentation schematics which are necessary to understand the addition of Train D.

STP Response:

Generic #3 DOC A1-1 for CTS 3.5.2, Action a
 DOC A1-1 for CTS 3.5.6, Actions a, b, and c
 DOC A1-3 for CTS 3.5.6, LCO Statement
 JFD #5 and #6 for ITS 3.5.2, All Actions

CTS 3.5.2 and CTS 3.5.6 have been combined into one LCO - ITS 3.5.2. ITS 3.5.2 requires three ECCS trains to be Operable. All ITS Actions refer to the inoperability of SI or RHR "subsystems". The Bases Background discussion uses "trains" and "subsystems" interchangeably when an ECCS train appears to be composed of components from more than one subsystem.

Comments: The use of the term "subsystems" is not distinct as the use of the term "trains". The LCO/Bases terminology should be changed to "ECCS train(s)" or "RHR train(s)". This is because an inoperable RHR heat exchanger in one RHR subsystem also makes a "SI" subsystem flowpath inoperable. Likewise, the RHR "loop" terminology used in this LCO and elsewhere in the ITS should be clarified or RHR "trains" should be used consistently. Alternately, the two CTS LCOs could be retained as two separate ITS LCOs in this conversion.

STP Response:

Generic #4	DOC L21	-	CTS 4.6.2.1.c.2 and 4.6.2.3.b ITS SRs 3.6.6.5, 3.6.6.6 and 3.6.6.7
	DOC A9	-	CTS 4.5.2.e.1 and 2 ITS SRs 3.5.2.5 and 3.5.2.6
	DOC M3, L22,	-	CTS 4.7.1.5; 4.7.1.2.1.b.1 & 2 ITS SR 3.7.2.1; SRs 3.7.5.3, 3.7.5.4
	DOC L27; L28	-	CTS 4.7.3.0.1 & 2; CTS 4.7.4.b.1, 2 & 3 ITS SRs 3.7.7.1, 3.7.7.2; ITS SRs 3.7.8.2, 3, & 4
	DOC L32; L40	-	CTS 4.7.14 b; 4.7.7.e.2 ITS SRs 3.7.0.1 & 2; SR 3.7.11.3
	DOC L41;	-	CTS 4.7.P.d.2; 4.9.12.d.2 ITS SRs 3.7.12.3; 3.7.13.3

There are various CTS requirements, as identified above, which have verifications that pumps/chillers/trains or systems, actuate or start on the specified test actuation signal. ITS has changed these requirements to permit credit for either an "actual or simulated" test signal be given to satisfy this test for Operability.

Comment: It is acceptable to make this ITS change; however, there are consistency issues existing in the technical justification for these changes that needs a uniform resolution. These identical CTS changes have been justified simultaneously, at more restrictive, less restrictive and as administrative. It is proposed that DOC L21 of CTS 3/4.6.2 be used as a standard which has the following features: It is justified as less restrictive change and the specified design actuation signal is relocated to the Bases of the SR description with an "LA" DOC justification. STP is requested to standardize each CTS change which use these features.

STP Response:

3.5.2, ECCS - Operating

3.5.2-1 JFD #3
STS 3.5.2, Applicability, Note #1

STS 3.5.2, Applicability, Note #1 permits both (SI) pump flow paths to be isolated by closing the isolation valves for up to 2 hours to perform pressure isolation valve testing. The ITS deletes this note without adequate technical explanation.

Comment: Specifically explain how does STP perform PIV testing without isolating the ECCS flowpaths, without entering Actions and without the need of this exception to the LCO Applicability?

STP Response:

3.5.2-2 JFD #5 and #6
ITS 3.5.2 Actions A, B, C, D, F and G

Comment: This is the same as Generic Comments #1 and #3.

STP Response:

3.5.2-3 JFD #5
ITS 3.5.2 Action B, Completion Time and Action F

The JFD #5 justification in Action B for adding "21 days from discovery of failure to meet the LCO" implies this is part of the current licensing basis which is not the case. JFD #5 should only apply to the 7 day Completion Time. The JFD #5 justification in ITS Action F implies this new action is part of the current licensing basis which is not the case.

Comment: Please revise the submittal to clarify the difference between the proposed new requirements and the current licensing basis.

STP Response:

3.5.2-4 JFD #3
STS SR 3.5.2.1
DOC L4
CTS 4.5.2.a

CTS 4.5.2.a lists two valves in each ECCS train which needs to have position verified every 24 hours. ITS 3.5.2 deletes this CTS surveillance.

Comment: It is agreed that these valves are not those valves where a misalignment of a single valve will cause the defeat of multiple trains of equipment. A misaligned valve can re-direct ECCS flow, however, away from the intended cold-leg injection flowpath to the reactor core.

STP has already been provided with a 24 hour Frequency which is a relaxation from the 12 hours required by the more common Westinghouse ECCS design and the STS. With the proposed deletion of this verification, STP should state specifically how these valves will be verified in their correct position and at what frequency. Will ITS SR 3.5.2.1, as written, apply to these type of valves? It appears both sets of these valves are not controlled in the same manner. It has been verified on the ECCS F&ID's that the three High Head Hot Leg Recirculation valves state "power lockout" but the three Low Head Hot Leg Recirculation Isolation valves are not equally indicated. STP should explain this difference.

STP Response:

3.5.2-5 DOC A1-2
CTS 4.5.2.b.2, 4.5.2.e.1 and 2, 4.5.2.f
JFD #4
ITS SRs 3.5.2.1, 3.5.2.4 and 3.5.2.5

CTS 4.5.2.b.2, 4.5.2.e.1 and 2, 4.5.2.f have been modified to change "ECCS" to the specific names and identity of the components to be tested in each ECCS train flow paths. This similar change has been made inconsistently in the ITS to SRs 3.5.2.1, 3.5.2.4 and 3.5.2.5.

Comment: Because of the new ITS SR 3.5.2.3, the ITS 3.5.2.4 does not need to redundantly verify the RHR developed pump head. Also, the LCO applies to ECCS trains and the Bases define the components in each ECCS train. Therefore, reference to each valve in an ECCS train will apply equally to all the valves in the HHSI, LHSI and the RHR piping. It appears that only ITS SR's 3.5.2.3 and 3.5.2.4 need specific name clarification. STP is requested to revise the submittal or otherwise explain if there is another plant specific reason to identify each component differently than the STS. Please note resolution of Generic Comment #3 may affect this comment.

STP Response:

3.5.2-6 DOC A1-5
CTS 3.5.6 Action b
ITS 3.5.2, Action C

CTS 3.5.6 Action b states "With two RHR loops inoperable, restore at least two RHR loops to Operable status within 24 hours...". ITS 3.5.2 Action C requires one restored Operable.

Comment: This is a technical change which has been justified with an editorial DOC A1. At question, specifically, is whether two inoperable trains must both be made Operable within 24 hours or is only one inoperable train to be made Operable in 24 hours. STP is requested to explain how this is currently interpreted and procedurally implemented for the CTS and provide an appropriate L DOC or explain why this is not necessary.

STP Response:

3.5.2-7 DOC A8
CTS 4.5.2.e.1
ITS SR 3.5.2.1

CTS 4.5.2.e.1 verifies that each valve actuates to the correct position on an Automatic Switchover to Containment Sump test signal. ITS SR 3.5.2.4 exempts from repeated verification any valve that is locked, sealed or otherwise secured in position.

Comment: This change is acceptable to make because it is a relaxation provided in the guidance of NUREG-1431. The categorization by STP is in error. This change is not an administrative change but it is a less restrictive technical change because there is a reduction in the number of valves positions to be checked. STP should revise the submittal and provide a revised "L" DOC.

STP Response:

3.5.2-8 DOC A9
CTS 4.5.2.e.1 and 2
ITS SRs 3.5.2.5 and 3.5.2.6

CTS 4.5.2.e.1 and 2 verifies that each valve actuates to the correct position on an Automatic Switchover to Containment Sump or a Safety Injection test signal. The ITS SR 3.5.2.5 and SR 3.5.2.6 uses these same test signals or an actual actuation signal.

Comment: This change is acceptable to make because it is a relaxation provided in the guidance of NUREG-1431. The categorization by STP is in error. This change is not an administrative change but it is a less restrictive technical change. STP should revise the submittal and provide a revised "L" DOC just like the L21 for LCO 3.6.6 for the same CTS change.

STP Response:

3.5.2-9 NOT USED

3.5.2-10 NOT USED

3.5.2-11 DOC A1-4
CTS 4.5.2.f
ITS SR 3.5.2.4

CTS 4.5.2.f has been revised to eliminate the specific reference to test the pumps on recirculation flow. ITS SR 3.5.2.4 provides that pump performance may be verified with more accuracy at the "test flow point" with higher flows.

Comment: This technical change in the pump test requirements is justified as a "DOC A.1" which is for reformatting or editorial CTS changes. STP should revise the submittal to provide a new technical DOC justification which specifically addresses this change in pump testing requirements.

STP Response:

3.5.2-12 DOC LA4
CTS 3.5.2 and Action a
CTS 3.5.6
ITS 3.5.2

CTS 3.5.2 and 3.5.6 explicitly define the components which make each ECCS train and RHR loop Operable. ITS 3.5.2 has relocated these descriptions of the Operability requirements to the Bases.

Comment: This relocation is acceptable; however, the text descriptions are confusing due to the comments noted in Generic Comment #3. Resolution of this Comment is dependent upon the generic resolution.

STP Response:

3.5.2-13 DOC A7 and L2
CTS 4.5.2 Action a
ITS 3.5.2 Action D, E and F

CTS 4.5.2 Action a provides compensatory action when only one ECCS train is inoperable. When two ECCS trains are inoperable, LCO 3.0.3 is invoked. ITS 3.5.2 adds Action D with two ECCS trains inoperable which allows 24 hours to restore two trains Operable before going to Mode 3. ITS 3.5.2 also adds Action F with three ECCS trains inoperable which invokes LCO 3.0.3.

Comment: In the CTS, the invoking of LCO 3.0.3 begins when two ECCS trains become inoperable rather than after three trains are inoperable. DOC A7 is not an administrative change but a technical CTS change which is really part of DOC L2. It is contradictory as presented in the CTS markup to justify these CTS changes as both administrative and less restrictive technical, concurrently. STP is requested to delete DOC A7 and just expand DOC L2, accordingly.

STP Response:

3.5.2-14 NOT USED

3.5.2-15 DOC LA4
CTS 3.5.6 Footnote (*)

CTS 3.5.6 Footnote (*) states that valves MOV-0060 and MOV-0061 may have power removed to support the Fire Hazards Analysis Report (FHAR) assumptions. This footnote is not retained in ITS 3.5.2.

Comment: DOC LA4 discusses the relocation of the Operability requirements for the ECCS trains and the RHP loops. There is no specific justification for not retaining this CTS 3.5.2

Footnote (*). These valves are apparently the RHR Suction Isolation valves which protect the RHR from the higher RCS pressure. Why was this footnote placed in the CTS? Doesn't the RHR System interlock perform the same function? The Bases apparently do not contain any discussion to explain why these RHR valves are deactivated to support the FHAR assumptions. There is no discussion for how long these valves are deactivated and how often? STP is requested to provide a separate "LA" DOC for this CTS change.

STP Response:

3.5.2-16 DOC L17
 CTS 4.5.6.1
 ITS SR 3.5.2.3

Comment: This is the same as Generic Comment #2.

STP Response:

3.5.2-17 JFD #3
 STS SR 3.5.2.7

The ITS has not adopted SR 3.5.2.7 based on JFD #3.

Comment: It is assumed from JFD #3 that there are no ECCS throttle valves in the STP design. Verify if this assumption is correct.

STP Response:

3.5.2-18 ITS 3.5.2 Actions
 CTS 3.5.2 Actions
 CTS 3.5.6 Actions

CTS 3.5.2 & 3.5.6 provide Actions for the Safety Injection and RHR Systems. ITS 3.5.2 Actions combine these requirements into one LCO.

Comment: ITS 3.5.2 does not contain Conditions for various combinations of Safety Injection and RHR Systems inoperable. As written, each applicable individual Condition would be entered for any combination. Was this the intention? If so, what was the purpose of combining these systems into one LCO?

STP Response:

3.6.6 Containment Spray and Cooling System

- 3.6.6-1** JFD #11
ITS 3.6.6, Action A and B, Completion Times
DOC M7
CTS 3.6.2.1 Action a and CTS 3.6.2.3 Action a

Comment: This is the same as Generic Comment #1.

STP Response:

- 3.6.6-2** JFD #5
ITS 3.6.6 Condition B, Note
DOC A23
CTS 3.6.2.3, LCO Statement

CTS 3.6.2.3 states "Three independent groups of RCFCs shall be Operable with a minimum of two units in two groups and one unit in the third group." The following note is added to ITS 3.6.6 Condition B: "One RCFC fan of one RCFC train may be removed from service without entering Condition B for that train. If more than one RCFC fan is removed from service, appropriate condition(s) must be entered."

Comment: The retention of this CTS requirement is acceptable. However, the following rewording is proposed to the Note: "One RCFC fan of one RCFC train may be removed from service without entering Condition B for that train. If more than one RCFC fan is removed from service, enter applicable ~~appropriate~~ Conditions and Required Actions." This is consistent with other Action table notes in the STS.

STP Response:

- 3.6.6-3** ITS 3.6.6 Actions
CTS 3.6.2.1 Actions
CTS 3.6.2.3 Actions

CTS 3.6.2.1 & 3.6.2.3 provide Actions for the Containment Spray System and the RCFCs. ITS 3.6.6 Actions combine these requirements into one LCO.

Comment: ITS 3.6.6 does not contain Conditions for various combinations of containment spray trains and RCFCs inoperable. As written, each applicable individual Condition would be entered for any combination. Was this the intention? If so, what was the purpose of combining these systems into one LCO?

STP Response:

3.6.6-4 NOT USED

3.6.6-5 JFD #12
ITS 3.6.6 Action F
DOC A26

ITS 3.6.6 Action F has been modified to replace the "Any combination of three or more trains inoperable" with "Three RCFC trains inoperable."

Comment: DOC A26 is not a single administrative CTS change. It contains multiple of technical CTS changes which are inadequately justified. It appears that being in Condition C and Condition D simultaneously is equally or more degraded than the new ITS Action F Condition statement. Adopting the STS Action F Condition statement, as is, prevents four trains of the six total Containment Spray and Cooling trains being inoperable. STP is requested to explicitly state the percentage of cooling capacity remaining, as each train and combinations of trains are assumed unavailable, until loss of function exists as defined by the safety analysis of record.

STP Response:

3.6.6-6 JFD #5
ITS SR 3.6.6.4
DOC A27
CTS 4.6.2.1.b

CTS 4.6.2.1.b requires verification on a Staggered Test Basis of the listed performance features of the CS pump. ITS SR 3.6.6.4 verifies these performance requirements in accordance with the IST Program.

Comment: This is the same as Generic Comment #2. Also, the testing of the CS pump at the "required developed head" is a technical CTS change and not administrative. STP is requested to provide a specific technical justification for this change.

STP Response:

3.6.6-7 JFD #3
ITS SR 3.6.6.5

ITS SR 3.6.6.5 verifies if each automatic containment spray valve in the flowpath actuates to the correct position. The ITS has not adopted the phrase which exempts any valve "that is not locked, sealed, or otherwise secured in position".

Comment: The JFD #3 justification is not sufficiently explicit to explain why this phrase is not applicable for STP in ITS SR 3.6.6.5 while it is applicable for ITS SR 3.6.6.1. STP is requested to provide this additional detailed explanation.

STP Response:

3.6.6-8 DOC A1-1
CTS 3.6.2.1 and CTS 3.6.2.3
ITS 3.6.6 and Bases

CTS 3.6.2.1 and CTS 3.6.2.3 require the "independence" of the Containment Spray System (CS) and the RCFC groups in the LCO Statements. ITS 3.6.6 does not retain the "independence" requirements in the LCO statement but relocates this to the Bases where the LCO Operability requirements are established for the respective CS and RCFC trains.
Comment: It is acceptable to make these changes; however, the DOC A1-1 justification is inadequate when this should be an "LA" DOC. (For reference, see Section 3.7, DOC LA.8 for similar situation.) STP is requested to revise the submittal to provide a new justification.

STP Response:

3.6.6-9 NOT USED

3.6.6-10 NOT USED

3.6.6-11 DOC LA11
CTS 4.6.2.1.b, c.1, c.2, and d
CTS 4.6.2.3.a

CTS 4.6.2.1.b, c.1, c.2, d, and CTS 4.6.2.3.a contain details for how the CTS surveillance requirements are to be performed which are better relocated to the Bases. In most cases, these requirements have been relocated to the ITS 3.6.6 Bases.

Comment: It is acceptable to relocate the details for how to perform the CTS surveillance requirements to the ITS 3.6.6 Bases. DOC LA11 only justifies the relocation of the definition of the components and features for Operability of the Containment Spray and Cooling System. STP is requested to revise the submittal and provide a new "LA" DOC for relocating these CTS surveillance requirement details to the Bases. In addition, CTS 4.6.2.1.c.2 does not relocate the portion of the CTS requirement stating "coincident with a sequencer start signal" to the Bases for ITS SR 3.6.6.6. Also, CTS 4.6.2.3 does not relocate the entire portion indicated as moved to the Bases of ITS SR 3.6.6.2. Please modify the Bases to account for these discrepancies or justify their deletion from the TS.

STP Response:

3.6.6-12 DOC I.21
CTS 4.6.2.1.c.2 and 4.6.2.3.b
ITS SRs 3.6.6.5 and 3.6.6.6

Comment: This pertains to the "actual or simulated test signal" issue of Generic Comment #4.

STP Response:

3.6.6-13 DOC LA15
CTS 4.6.2.1 c
ITS SRs 3.6.6.5 and 3.6.6.6

CTS 4.6.2.1.c requires various verifications performed "during shutdown" which ITS 3.C.6 has not retained as a specific requirement.

Comment: It is acceptable to not state this specific requirement in the ITS 3.6.6; however, DOC LA15 states the CTS requirement is relocated to the Bases. A cursory review of the Bases does not show this requirement has been relocated. Please revise the submittal in accordance with DOC LA15 or direct the staff to the appropriate Bases location.

STP Response: