November 6, 1997

Mr. G. R. Horn
Sr. Vice President of Energy Supply
Nebraska Public Power District
1414 15th Street
Columbus, NE 68601

SUBJECT: COOPER NUCLEAR STATION - REQUEST FOR ADDITIONAL INFORMATION REGARDING THE IMPROVED TECHNICAL SPECIFICATIONS (TAC NO. M98317)

Dear Mr. Horn:

By letter dated March 27, 1997, the Nebraska Public Power District (NPPD) submitted a request for a license amendment to convert the current Technical Specifications (TSs) for the Cooper Nuclear Station (CNS) to a format consistent with NUREG-1433, Revision 1, "Standard Technical Specifications for General Electric Plants, BWR/4."

The NRC staff, with technical assistance from its contractor, the Idaho National Engineering Laboratory, has reviewed the information provided in the above submittal. Based upon that ongoing review, the staff will require additional information in order to complete its review of the conversion of the CNS TS to the improved format of NUREG-1433. The staff's initial request for additional information (RAI) is enclosed. In order for the staff to complete its review in a timely manner, we request that you submit a response to the enclosed RAI within 45 days of the receipt of this letter.

If you have any questions regarding this request, please call me at (301) 415-1336.

Sincerely,

ORIGINAL SIGNED BY:

James R. Hall, Senior Project Manager
Project Directorate IV-1
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

DFol

Docket No. 50-298

Enclosure: As stated

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

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2.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L.2		CTS 1.1.D ITS 2.1.1.3 The current Safety Limit (CTS 1.1.D) for the reactor vessel water level is that level shall be maintained not less than 18 inches above the top of the normal active fuel zone. This proposed Safety Limit (ITS 2.1.1.3) requires that level be greater than the top of the active irradiated fuel. This represents a less restrictive change because the top of the irradiated fuel at CNS is less than 18 inches above the top of the normal active fuel zone. The change still ensures adequate margin for effective action in the event of a level drop.	CTS bases refers to safety limit of 18 inches above TAF to ensure adequate decay heat removal and does not refer to "normal active fuel zone." Define differences between top of active fuel (TAF), top of irradiated fuel and top of "normal active fuel zone." How is "margin for effective action" still maintained? Explain.	
NPPD Response:					

ENCLOSURE

3.0	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.2		CTS 1.0.J STS LCO 3.0.1 ITS LCO 3.0.1 DOC A.2 states that the information contained in the first paragraph of CTS 1.0.J related to the definition of LCO is duplicative to that provided in ***10 CFR 50.36a***. 10 CFR 50.36a is the rule containing requirements for technical specification on effluents from nuclear power plants. It appears that this is a typo. The correct reference is ***10 CFR 50.36***.	Revise DOC A.2 to reflect the correct reference to 10 CFR.	
NPPD Response:					
2	A.8		STS LCO 3.0.6 ITS LCO 3.0.6 DOC A.8 describes the addition of LCO 3.0.6 which provides guidance regarding the appropriate actions to be taken when a single support system inoperability also results in the inoperability of one or more supported systems. No comparable guidance is provided in the CTS. DOC A.8 states that the CTS and various NRC guidance documents have not provided a consistent approach to the combined support/supported inoperability, but concludes that LCO 3.0.6 was included in the STS to "clarify existing ambiguities and maintain actions within the realm of previous interpretations. Therefore, the change is classified as administrative. The staff does not agree that this is an administrative change. Under the CTS, any time a support system inoperability also made a supported system inoperable, actions would have to be taken under the specifications for both system, unless otherwise stated. Therefore, the staff believes that this is a less restrictive change.	Reclassify this change as less restrictive and revise DOC accordingly.	
NPPD RESPONSE:					

Cooper Nuclear Station Improved TS Review Comments
iTS 3.1.3, Control Rod Operability

3.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.1		CTS 3.3.A.2.b and 3.3.B.1 ITS 3.1.3 Details of the methods for disarming control rod drives (CRDs) in CTS 3.3.A.2.b and 3.3.B.1 are proposed to be relocated to the Bases. These details are not necessary to ensure the associated CRDs of inoperable control rods are disarmed. ITS 3.1.3 Required Actions A.2 and C.2, which require disarming the associated CRDs of inoperable control rods, are adequate for ensuring associated CRDs and inoperable control rods are disarmed. As such, these details are not required to be in the ITS to provide adequate protection of the public health and safety. Changes to the Bases will be controlled by the provisions of the proposed Bases Control Program described in Chapter 5 of the Technical Specifications.	CTS 3.3.A and bases states to disarm CRD electrically while ITS bases states to disarm hydraulically. Explain.	
NPPD Response:					
2	M.8		CTS 4.3.2.a ITS SRs 3.1.3.2 and 3.1.3.3 The Surveillance condition described in CTS 4.3.2.a as "above 30% rated thermal power" is proposed to be changed to "Thermal Power is greater than the LPSP of the RWM," and shown in the form of a Note to proposed SRs 3.1.3.2 and 3.1.3.3. The LPSP is set at 22%, making this a more restrictive change. This change is necessary to ensure that control rod insertion capability is verified at the earliest opportunity in the applicable conditions.	Change is not more restrictive because 30% RTP > 22% RTP. Surveillance could be performed at or above 30%; therefore, it is noted that this is an administrative change.	
NPPD Response:					

3.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	A.2		CTS 3.3.C.3 Maximum scram insertion time ITS SR 3.1.3.4 Scram time verification CTS 3.3.C.3 requires that the maximum scram insertion time for 90% insertion of any OPERABLE control rod not exceed 7.0 seconds. 90% rod insertion is equivalent to notch position 4.8 or less. ITS SR 3.1.3.4 allows a maximum insertion time of 7.0 seconds to reach notch position 6 which is only 87.5% insertion. This is a less restrictive change to the maximum control rod insertion time.	Since control rod position is only readable at even number increments, ITS SR 3.1.3.4 must be adjusted to account for allowable maximum scram insertion times that meet the criteria of CTS 3.3.C.3. See comment 3.1.4-1 (DOC M.2).	
NPPD Response:					

3.1.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	M.4	2	ITS SRs 3.1.4.1 and 3.1.4.4 STS SRs 3.1.4.1 and 3.1.4.4 CTS 4.3.C.1 The wording of STS SR 3.1.4.1 could be interpreted to require testing all control rods following any fuel movement in the reactor pressure vessel (RPV) - even if only one bundle were moved in mid-cycle. The Bases for STS SR 3.1.4.1 make clear the intent is to only require testing of affected control rods following fuel movement in the RPV. To avoid misinterpretation of the intent, ITS SRs 3.1.4.1 and 3.1.4.4 only require testing of all rods following refueling and after shutdown ≥ 120 days. At other times, only affected rods are required to be tested. The proposed generic deviations from the STS appear consistent with the intent as expressed in the STS Bases.	Submit TSTF change request for this generic change. Add phrase to proposed words in SR 3.1.4.4 Bases establishing that individual rod testing occurs "at times other than after refueling."	
NPPD Response:					
2	M.2		CTS 3.3.C.3, maximum scram insertion time ITS 3.1.4 Table 3.1.4-1, control rod scram times ITS SR 3.1.3.4, scram time verification Note 2 to ITS Table 3.1.4-1 refers to ITS LCO 3.1.3 to identify control rods with scram times greater than 7.0 seconds to notch position 06 as inoperable. This criteria is not consistent with CTS 3.3.C.3 which specifies the criteria as not greater than 7.0 seconds to reach 90% of insertion which is notch position 4.8 or less. Notch position 06 is only 87.5% of rod insertion travel. This requirement is also identified separately in ITS 3.1.3 as incorrect for ITS SR 3.1.3.4, scram time verification.	Note 2 to ITS Table 3.1.4-1 must be adjusted to account for the allowable maximum scram insertion times that meet the criteria of CTS 3.3.C.3.	
NPPD Response:					

3.1.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		1 Bases 4	ITS 3.1.8 Actions CTS contain no action requirements in the event one or more SDV vent or drain valves are both inoperable and open, except for a unit shutdown by the definition of operability. (CTS are based on a design with only one valve in each vent or drain line.) Assuming a design change to add a valve to each line, the ITS proposes an action requirement for one valve inoperable in one or more lines (Action A) to isolate the associated line(s), instead of requiring the valve(s) to be restored to operable status, as required by the STS. The SDV vent and drain valve's primary function is to isolate the SDV during a scram to contain the reactor coolant discharge. Thus, JFD 1 justifies this difference by pointing out that the isolation function is satisfied if the line is isolated. In summary: ITS Required Action A.1 differs from the STS by requiring - in 7 days - isolation of the associated line, instead of requiring restoration of the SDV vent and drain valve to operable status. This action requirement is the same as STS Required Action B.1, in the event both valves are inoperable in one or more lines (except the allowed time is 8 hours). Because of this, the Note of STS Required Action B.1 precedes the Actions table in the ITS so that it applies to both ITS Actions A and B. JFD 1 justifies this placement of the note by pointing out that in both cases, it is necessary to unisolate the line under administrative controls to allow draining and venting of the SDV. This is done to prevent the scram on "Scram Discharge Volume Water Level - High." This difference to the STS has been approved by the NRC in the Safety Evaluations for Washington Nuclear Plant Unit 2 (WNP-2), Amendment 134 and LaSalle Units 1 and 2, Amendments 89 and 94, respectively. JFD 1 states the additional SDV vent and drain valves assumed by the ITS are being installed during refueling outage RE-17, Spring 1997 such that the CNS design will match the design assumed in the STS.	ITS Action A is less restrictive than STS Action A which requires a full return to operabiltiy in 7 days. With one valve inoperable in a line, the other valve can still perform the isolation function without the need to "permanently" isolate the line which requires periodic draining of the line. WNP-2 was granted this deviation from the STS based on their CLB. It is not an approved generic change. Revise the Actions and the note to adopt the STS wording and presentation.	

NPPD Response:

Cooper Nuclear Station Improved TS Review Comments
ITS 3.2.3, Linear Heat Generation Rate (LHGR)

3.2.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.1	1	CTS 3/4.11.B Linear Heat Generation Rate (LHGR) STS 3.2.3 Linear Heat Generation Rate (LHGR) CTS 3/4.11.B in total is not contained in the ITS and its requirements are moved to the Technical Requirements Manual based upon a letter from A.C. Thadani (NRC) to J.S. Charnley (GE), "Acceptance for Referencing of Amendment 19 to General Electric Topical Report NEDE-24011-P-A (GESTAR-II), General Electric Standard Application for Reactor Fuel" dated April 7, 1987.	Acceptance of this change is contingent upon NRC determiniation of CNS applicability to the General Electric Topical Report NEDE-24011-P-A (GESTAR-II), General Electric Standard Application for Reactor Fuel" dated April 7, 1987, as justification for moving CTS 3/4.11.B requirements to the TRM. NRC reviewing.	
NPPD Response:					

3.5.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L14		CTS 4.5.A.1.e CTS 4.5.G.2 The CTS requires daily checks and a quarterly calibration of the core spray header delta P instrumentation. The ITS does not include these requirements. CTS 4.5.G.2 requires functionally testing and caliorating the pressure switches which monitor the LPCI, Core Spray, HPCI and RCIC systems to ensure they are full, on a quarterly bases. ITS 3.5.1 does not include this requirement. Justification for omitting the CTS requirements is based on duplicate requirements in 10 CFR 50, Appendix B, Section XII. This section of the CFR deals with calibration of instruments and test equipment but not installed plant equipment.	There is inadequate justification for deleting the CTS Surveillance Requirements. Retain the requirements to check and calibrate the delta P instrumentation and pressure switches in the ITS or provide justification for the omission.	
NPPD Response:					
2			CTS 4.5.A.3.f CTS 4.5.A.3.f requires performing an air test on the drywell and torus headers and nozzles once every 5 years. These requirements are not included in the ITS. There is no justification for deleting this CTS requirement.	Revise the submittal to include the CTS requirement or to justify deletion of the requirement.	
NPPD Response:					

3.5.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	L2		CTS 4.5.A.1.b and c CTS 4.5.A.3.b and c CTS 4.5.C.1.b and c The Frequency of the CTS testing requirements for Containment Spray pump and valve operability, Low Pressure Coolant Injection pump and valve operability, and High Pressure Coolant Injection pump and valve operability, is monthly (31 days). ITS 3.5.1 does not include this testing requirement. The CTS requirement is included in the Inservice Testing Programs on a quarterly basis (once every 92 days). This decreases the Frequency of the CTS test requirements from 31 days to 92 days. There is no specific documentation included or referenced to support this test Frequency.	Revise DOC L2 with additional information such as plant-specific operating history or analysis to justify relaxing the Frequency for testing the pumps and motor operated valves associated with CS, LPCI, and HPCI.	
NPPD Response:					
4	L18	8	CTS 3.5.A.2 CTS 3.5.A.5 ITS 3.5.1, Required Actions B.1 and B.2 CTS 3.5.C.2 CTS 3.5.E.2 ITS 3.5.1, Required Actions H.1 and H.2 ITS 3.5.1 Required Actions B.1, and B.2, allow continued operation for 72 hours when one LPCI subsystem and one CS subsystem are inoperable. CTS 3.5.A.2, and 3.5.A.5, require entering an immediate shutdown track for the same condition. ITS 3.5.1, Required Actions H.1 and H.2 allow continued operation for 72 hours when one ADS valve and one HPCI system are inoperable. CTS 3.5.C.2 and 3.5.E.2 require entering an immediate shutdown track for the same condition. This change extends the CTS Completion Time for both situations from immediate to 72 hours.	ITS 3.5.1 Actions B and H are beyond-scope issues and are referred to the Reactor Systems Branch.	

3.5.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
NPPD Response:					
5		2	CTS 3.5.C.2 ITS3.5.1 Required Action D.1 STS 3.5.1 Required Action C.1 CTS 3.5.C.2 allows continued operation for a maximum of 7 days after HPCI is discovered Inoperable - providing that during such 7 days all active components that affect operability of the ADS, the RCIC system, both LPCI subsystems ans both core spray subsystems are operable. Corresponding STS 3.5.1 Action C allows continued operation for a maximum of 14 days for the same condition provided the RCIC system is verified operable within **1 hour** - by administrative means. (Apparently, the STS does not consider it necessary to specify verifying the operable status of the other systems - ADS, LPCI, and core spray - because it is expected that the operators are continuously aware of changes in the status of these systems.) Corresponding ITS 3.5.1 Action D replaces the 1 hour Completion Time with **Immediately**.	The reasons for specifying a Completion Time of immediately are not plant specific. In addition, staff disagrees that the 1-hour time could be confusing. Should RCIC become inoperable during the 14-day Completion Time for restoring HPCI operability, the unit would have to be in Mode 3 within the next 12 hours per ITS Action I (STS Action G). Revise the submittal to adopt the STS 1-hour Completion Time for verifying operability of the RCIC system.	
NPPD Response:					

3.5.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
6	L13		CTS 3.5.E.3 CTS 4.6.D.5 ITS SR 3.5.1.11 and Note STS SR 3.5.1.12 and Note CTS 4.6.D.5 requires performing the ADS manual operation test once per operating cycle with reactor pressure ≥ 100 psig. In the event this test is not performed during the required interval, CTS 3.5.E.3 requires performing this test within 12 hours after achieving 113 psig reactor steam pressure. ITS SR 3.5.1.11 requires the same test, with an equivalent Frequency of 18 months. The Note to this surveillance modifies to Frequency by only requiring the test be performed within a 12-hour limit same time, but not after achieving 113 psig, but when adequate steam pressure and flow are achieved. Adequate steam pressure is defined in the Bases as 920 psig. Thus, the time limit for performing the test is increased by the amount of time it takes to increase pressure from 113 psig to 920 psig. In addition, the 920 psig value is bracketed in the STS Bases. This means the ITS should use a plant-specific value. DOC L.13 does not explain why the 920 psig value is applicable to CNS and why increasing the time to complete the test after achieving 113 psig reactor pressure is an acceptable relaxation.	Provide additional documentation and justification for changing the CTS required pressure for performing the ADS manual operation test, from 113 psig to 920 psig, and the additional time permitted to perform this test after achieving 113 psig reactor pressure.	
NPPD Response:					

3.5.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L1		CTS 3.5.F.5.c ITS SR 3.5.2.1 CTS 3.5.F.5.c requires a Condensate Storage Tank (CST) level of 230,000 gallons when in Mode 5 during an OPDRV. ITS SR 3.5.2.1 requires 14 ft. (equivalent to 150,000 gallons) for the same conditions. There is inadequate justification for the decrease in CST level.	The bases suggests that NPSH, vortexing, and recirculation/makeup were considered to determine the lower water level limit. There is no discussion on why 80,000 gallons of water required in the CTS are no longer required in the ITS. Provide additional discussion describing the difference in analysis of the required water levels.	
NPPD Response:					
2		2	STS SRs 3.5.2.1 and 3.5.2.2 ITS SR 3.5.2.1 The ITS combines the two STS SRs to verify that the water supply(ies) to the LPCI subsystem(s) and/or core spray subsystem(s) are above the minimum volume required. STS appears to assume a design in which LPCI is not capable of being aligned to draw from a condensate storage tank (CST). Thus, STS SR 3.5.2.1 only addresses the LPCI subsystem water source - the suppression pool water level. JFD 2 indicates that because the CST is also available to the LPCI subsystem, then the core spray water supply surveillance, STS SR 3.5.2.2, can equally apply to the LPCI subsystem. It appears this adaptation of the STS to the CNS design is acceptable. But staff needs more information regarding why CNS design differs from that assumed in the STS.	Revise JFD 2 to further address the uniqueness of the CNS LPCI water supply design relative to other BWR/4 plants.	
NPPD Response:					

3.5.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	L5		CTS 4.5.G.2 ITS 3.5.2 STS 3.5.2 CTS 4.5.G.2 requires functionally testing and calibration of the low pressure ECCS "keep filled" pressure switches. ITS 3.5.2 does not include this requirement. Justification for omitting the requirements is based on duplicate requirements in 10 CFR 50, Appendix B, Section XII. This section of the CFR deals with calibration of instruments and test equipment but not installed plant equipment.	Maintain the CTS requirement to functionally test and calibrate the low pressure ECCS "keep filled" switches or provide justification for the omission. See Comment 3.5.1-1	
NPPD Response:					

3.5.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L3		CTS 4.5.D.1.b CTS 4.5.D.1.c CTS 4.5.D.1.b and c require performing an Operability test on the RCIC pump and motor operated valves once every month. ITS 3.5.3 does not include these requirements. Justification is based on industry plant operating experience. There is inadequate justification for deleting this CTS requirement.	Relying upon industry operating experience only is inadequate justification for deleting the CTS requirement for performing Operability tests on the RCIC pump and motor operated valves. Provide justification based on specific plant design or conditions to substantiate deleting these CTS surveillance requirements.	
NPPD Response:					
2	L7	2	CTS 4.5.D.2 ITS 3.5.3 Required Action A.1 STS 3.5.3 Required Action A.1 CTS 4.5.D.2 requires immediately verifying the HPCI system is Operable when the RCIC is determined Inoperable. ITS 3.5.3 Action A retains this CTS requirement. However, the Completion Time of "Immediate" differs from the corresponding STS time of 1 hour. Note: DOC L.7 incorrectly describes the disposition of CTS 4.5.D.2 as being deleted; in fact it is retained as ITS 3.5.3 Required Action A.1.	Revise the submittal to adopt the STS Completion Time of 1 hour. See Comment 3.5.1-5. Revise DOC L7 to address changing "immediate" to one hour and to address clarifying that HPCI system operability be verified by administrative means.	
NPPD Response:					

3.5.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	L5		CTS 4.5.D.1.e STS SR 3.5.3.4 ITS SR 3.5.3.4 Bases for ITS SR 3.5 3.4, STS markup page B 3.5-27 The steam pressure for performing the RCIC system cyclic flow test is changed from "approximately 150 psig" to "≤ 165 psig," a bracketed number in the STS. The CTS value of 150 psig should be retained, as indicated by the brackets in STS SR 3.5.3.4. Changing the current number is a beyond scope change. Note: The proposed Bases for ITS SR 3.5.3.4 is consistent with the STS, giving a number of 150 psig. Neither STS nor ITS Bases discuss the 165 psig allowance - but should.	Changing the steam pressure allowed for conducting the test is referred to the Reactor Systems Branch for review.	
NPPD Response:					
4	L9		CTS 4.5.G.2 CTS 4.5.G.2 requires functionally testing and calibrating the RCIC system "keep filled" pressure switches on a quarterly basis. ITS 3.5.3 does not include this requirement. Justification for omitting the CTS requirement is based on duplicate requirements in 10 CFR 50, Appendix B, Section XII. This section of the CFR deals with calibration of instruments and test equipment but not installed plant equipment.	There is inadequate justification for omitting the CTS requirement from the ITS. Retain the requirement to functionally test and calibrate the RCIC pressure switches in the ITS or provide justification for the omission. See Comment 3.5.1-1	
NPPD Response:					

Cooper Nuclear Station Improved TS Review Comments
ITS 3.5.3, RCIC System

CNS CMT

3.5.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5		Bases 2	Bases for ITS SR 3.5.3.5, STS markup page B 3.5-28 The omission from the second paragraph addressing the rational for the 18-month Frequency for the RCIC automatic actuation test is not based on a plant-specific design difference and is not editorial.	This is not a justifiable plant-specific or editorial difference. Adopt the STS language proposed for omission. Such omissions may occur throughout the CNS ITS Bases. Unless the CNS design or current licensing basis supports such omissions, the STS wording should be adopted. The response to this comment should address the global aspects of this type of Bases difference.	
NPPD Response:					

3.6.1.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.2 A.13		CTS 1.0.P CTS 3.7.A.2.a ITS B3.6.1.1 Bases - BACKGROUND CTS 1.0.P defines Primary Containment Integrity. A markup of CTS 1.0.P is provided in the CTS markup of ITS 1.0, but not in the CTS markup of ITS 3.6.1.1. Justification A.2 in the CTS markup of ITS 3.6.1.1 and justification A.13 in the CTS markup of ITS 1.0 both state that the definition of Primary Containment Integrity is deleted from the ITS. This is incorrect. The details of the definition are relocated to ITS B3.6.1.1 Bases- BACKGROUND, which is a Less Restrictive (LA) change. In addition, the individual statements within the definition (CTS 1.0.P.1, 1.0.P.2, 1.0.P.3 and 1.0.P.4) are used as the basis for various ITS SRs and Bases statements in ITS 3.6.1.2 and ITS 3.6.1.3, which are Administrative and Less Restrictive (LA) changes. See Item Numbers 3.6.1.2-1 and 3.6.1.3-3.	Revise the CTS markup of ITS 3.6.1.1 to include a markup of CTS 1.0.P and provide additional discussion and justification for relocating the details of the definition to ITS B3.6.1.1 Bases-BACKGROUND and to ITS 3.6.1.2 and ITS 3.6.1.3. See Item Numbers 3.6.1.2-1 and 3.6.1.3-3.	
NPPD Response:					

3.6.1.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	A.4		CTS 4.7.A.1.d CTS 4.7.A.2 STS SR 3.6.1.1.1 and Associated Bases ITS SR 3.6.1.1.1 and Associated Bases CTS 4.7.A.1.d and 4.7.A.2 specify the visual inspections and leak rate testing requirements for Primary Containment based on 10 CFR 50, Appendix J, Option A as modified by approved exemptions. Even though the STS is bases on Appendix J Option A, the ITS modifies the STS to explicitly state 10 CFR 50 Appendix J Option A, to avoid confusion since Appendix J also has an Option B. This change is acceptable. Changes to the STS with regard to Option A versus Option B are covered by a letter from Mr. Christopher I. Grimes to Mr. David J. Modeen, NEI, dated 11/2/95 and TSTF-52. While a majority of the changes in the letter and TSTF-52 as modified by staff comments deal with Option B, some of the changes are applicable to both Option A and Option B.	Licensee to consider updating the Bases to include those portions of the 11/2/95 letter and updated TSTF-52 when OG provides revisions that are applicable to 10 CFR 50 Appendix J, Option A.	
NPPD Response:					

3.6.1.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	A.4		CTS 4.7.A.2.c.2 CTS 4.7.A.2.f.3 CTS 4.7.A.2.f.4 CTS 4.7.A.2.f.5 ITS SR 3.6.1.2.1 and Associated Bases ITS SR 3.6.1.3.10 and Associated Bases CTS 4.7.A.2.c.2, 4.7.A.2.f.3, 4.7.A.2.f.4 and 4.7.A.2.f.5 specify exemptions to 10 CFR 50 Appendix J. The exemptions for MSIV leak rate testing (CTS 4.7.A.2.f.3) and containment air lock leak rate testing (CTS 4.7.A.2.f.5) are addressed in ITS SR 3.6.1.3.10, ITS SR 3.6.1.2.1 and their associated Bases, respectively. See item Number 3.6.1.2-3 for further concerns with regard to the air lock exemption. The exemptions for CTS 4.7.A.2.c.2 (ILRT frequency extension of up to 8 months) and CTS 4.7.A.2.f.4 (main steam line and feedwater line expansion bellows leakage testing) do not seem to be retained in the ITS or its associated Bases, except for the phrase in ITS SR 3.6.1.1.1 "in accordance with 10 CFR 50 Appendix J, as modified by approved exemptions." Justification A.4 implies that all the exemptions are to be retained.	Provide additional discussion and justification to verify that the Appendix J exemptions specified in CTS 4.7.A.2.c.2 and 4.7.A.2.f.4 are still valid exemptions at CNS and to which licensee controlled document they have been relocated.	
NPPD Response:					
4	A.5		CTS 3/4.7.A Justification A.5 indicates that a CTS requirement is moved to ITS 3.6.4.3, but does not identify the requirement nor the CTS location. CTS Sections 3/4.7.A.1 through 3/4.7.A.5 do not show requirements that are moved to ITS 3.6.4.3.	Correct this discrepancy.	
NPPD Response:					

3.6.1.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5		Bases 1	STS B3.6.1.1 Bases-APPLICABLE SAFETY ANALYSES ITS B3.6.1.1 Bases-APPLICABLE SAFETY ANALYSES STS B3.6.1.1 Bases-APPLICABLE SAFETY ANALYSES states: "Primary containment satisfies Criterion 3 of the NRC Policy Statement." ITS B3.6.1.1 Bases-APPLICABLE SAFETY ANALYSES changes this by deleting "NRC Policy Statement" and replacing it with "Reference 4." Ref. 4 is 10 CFR 50.36(c)(2)(ii). A similar change is made in all other sections of ITS B3.6. This change is incorrect; The Bases must be able to stand alone, references only provide supplemental information. Therefore, the correct change should replace "NRC Policy Statement" with "10 CFR 50.36(c)(2)(ii)". Reference 4 in the references may be retained if desired.	Revise the statement accordingly.	
NPPD Response:					
6		Bases 1	STS B3 6.1.1 Bases - SR 3.6.1.1.1 ITS B3.6.1.1 Bases - SR 3.6.1.1.1 STS B3.6.1.1 Bases SR 3.6.1.1.1 states that failure to meet various other STS SR 3.6.1.x.x's does not necessarily result in failure of STS SR 3.6.1.1.1. ITS B3.6.1.1 Bases-SR 3.6.1.1.1 deletes all STS SR 3.6.1.x.x's except STS/ITS SR 3.6.1.2.1. The total deletion of the other SR 3.6.1.x.x's is incorrect. STS SR 3.6.1.2.13 MSIV leakage is retained in the ITS as ITS SR 3.6.1.3.10.	Correct the ITS markup to include ITS SR 3.6.1.3.10 in the discussion of ITS B3.6.1.1 Bases - SR 3.6.1.1.1.	
NPPD Response:					

3.6.1.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.2 A.5 A.13		CTS 1.0.P.2 CTS 3.7.A.2.a ITS B3.6.1.1 Bases - BACKGROUND ITS B3.6.1.2 Bases-LCO CTS 1.0.P defines Primary Containment Integrity. A markup of CTS 1.0.P is provided in the CTS markup of ITS 1.0, but not in the CTS markup of ITS 3.6.1.2. Justification A.2 in the CTS markup of ITS 3.6.1.2 and justification A.13 in the CTS markup of ITS 1.0 both state that the definition of Primary Containment Integrity is deleted from the ITS. This is incorrect. The details of the definition with regard to CTS 1.0.P.2 are relocated to ITS B3.6.1.1 Bases-BACKGROUND, ITS 3.6.1.2 ACTIONS, ITS SR 3.6.1.2.1 Note, and ITS B3.6.1.2 Bases which are Administrative and Less Restrictive (LA) changes. See Item Number 3.6.1.2-7.	Revise the CTS markup of ITS 3.6.1.2 to include a markup of CTS 1.0.P.2 and provide additional discussion and justification for the Administrative and Less Restrictive (LA) changes of relocating the airlock details of the definition to ITS B3.6.1.1, ITS 3.6.1.2, and ITS B3.6.1.2.	
NPPD Response:					
2	A.4		CTS 4.7.A.2.f.5 STS SR 3.6.1.2.1 and Associated Bases ITS SR 3.6.1.2.1 and Associated Bases See Item Number 3.6.1.1-2.	Licensee to consider updating ITS SR 3.6.1.2.1 Notes and Associated Bases to include those portions of the 11/2/95 letter and updated TSTF-52 when OG provides revision that are applicable to 10 CFR 50 Appendix J, Option A.	
NPPD Response:					

3.6.1.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	A.4		CTS 4.7.A.2.f.5 ITS SR 3.6.1.2.1 and Associated Bases CTS 4.7.A.2.f.5 specifies the leak rate testing for the Primary Containment Air Lock, which contains an exemption from 10 CFR 50 Appendix J Option A. While the specifics of the exemption are included in ITS SR 3.6.1.2.1, the details of the performance of the test are relocated to the ITS B3.6.1.2 Bases-SR 3.6.1.2.1. Justification A.4 does not address this relocation of details to the Bases.	Provide additional discussion and justification for this relocation of details.	
NPPD Response:					
4	A.4	3	CTS 4.7.A.2.f.5 ITS SR 3.6.1.2.1 ITS SR 3.6.1.2.1.b specifies an overall air lock leakage rate of ≤ 0.23 scfh when tested at ≥ 3.psig. CTS 4.7.A.2.f.5 does not specify a leakage rate for the 3 psig air lock leakage test. However, CTS 4.7.A.2.f.5 does state that for test pressures less than 58 psig, the leakage is adjusted to the equivalent value at 58 psig. No discussion or justification is provided to show from where the 0.23 scfh leakage rate came.	Provide additional discussion and justification to show that the 0.23 scfh leakage rate is based on current licensing basis.	
NPPD Response:					

3.6.1.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5	M.1		STS SR 3.6.1.2.2 ITS SR 3.6.1.2.2 and Associated Bases STS SR 3.6.1.2.2 verifies that only one door in the air lock can be opened at a time on a frequency of 184 days. TSTF-17 modifies STS SR 3.6.1.2.2 and associated Bases by deleting the Note and changing the frequency to 24 months. ITS SR 3.6.1.2.2 and its associated Bases implement TSTF-17; however, the SR frequency and Bases changes are not in accordance with TSTF-17.	Licensee to update submittal to be in accordance with TSTF-17 or provide additional justification for the deviations based on current licensing basis, system design or operational constraints.	
NPPD Response:					
6			CTS 3.7.A.2.a ITS 3.6.1.2 Action A Justification L.2 states the following: "Proposed ITS 3.6.1.2 ACTION A is proposed to be added to CTS 3.7.1.2...". There is no CTS 3.7.1.2 in the CTS markup.	Correct this discrepancy.	
NPPD Response:					

3.6.1.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
7	L.2		CTS 1.0.P.2 CTS 3.7.A.2.a ITS 3.6.1.2 ACTION A CTS 3.7.A.2 requires containment integrity. The CTS definition of containment integrity (CATS 1.0.P.2) requires at least one OPERABLE air lock door. ITS 3.6.1.2 ACTION A is added to provide Required Actions when one air lock door is inoperable. The justification for this change (L.2) is classified as Less Restrictive. However, this change adds Required Actions where none were required by the CTS and is, therefore, More Restrictive.	Reclassify this change as More Restrictive and provide additional discussion and justification as appropriate.	
NPPD Response:					
8		Bases 1	ITS B3.6.1.2 Bases - APPLICABLE SAFETY ANALYSES ITS B3.6.1.2 Bases - REFERENCES See Item Number 3.6.1.1-5	See Item Number 3.6.1.1-5	
NPPD Response:					

3.6.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.4	3 Bases 3 Bases 6	CTS 3.7.A.2.b STS SR 3.6.1.3.2 Note 2 ITS SR 3.6.1.3.1 and Associated Bases CTS 3.7.A.2.b allows the Drywell and Suppression Chamber Purge and Vent Systems to be in operation with the 24 inch supply and exhaust valves open provided that if venting and purging is through the Standby Gas Treatment (SGT) System, both SGT trains shall be OPERABLE and only one SGT train shall be in operation. This condition is not applicable provided the 2 inch bypass lines are used. Note 2 to STS SR 3.6.1.3.2 is modified in the ITS to address this requirement. The Note in ITS SR 3.6.1.3.1 as proposed does not meet the intent of the CTS requirements. It would allow venting and purging to continue with one SGT subsystem inoperable. This is unacceptable. In addition, the justification (3) used to add the Note justifies deleting purge valve leakage limit SRs not the adding of this Note. See Item Numbers 3.6.1.3.2 and 3.6.4.3-8.	Revise the ITS markup of ITS SR 3.6.1.3.1 Note to reflect CTS 3.7.A.2.b requirements. Provide additional discussion and justification as necessary for this change. See Item Numbers 3.6.1.3-2 and 3.6.4.3-8.	
NPPD Response:					

3.6.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	A.4	3 Bases 3 Bases 6	CTS 3.7.A.2.b ITS 3.6.1.3 ACTIONS ITS SR 3.6.1.3.1 ITS 3.6.4.3 ACTIONS Because of the plant specific requirements associated with CTS 3.7.A.2.b, a Note has been added to ITS SR 3.6.1.3.1 (See Item Number 3.6.1.3-1.) and the staff proposes ACTIONS be included in ITS 3.6.4.3 with regard these requirements (See Item Number 3.6.4.3-8). Consideration should also be given to adding appropriate Conditions, Required Actions and Completion Times to ITS 3.6.13 to supplement the proposed staff requirements of ITS 3.6.4.3 ACTIONS.	Revise the ITS 3.6.1.3 ACTIONS as necessary and provide the appropriate discussions and justifications. See Item Number 3.6.4.3-8.	
NPPD Response:					

3.6.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	A.13 M.7		CTS 1.0.P.1 CTS 1.0.P.3 CTS 1.0.P.4 ITS 3.6.1.3 - SRs and Associated Bases CTS 1.0.P defines Primary Containment Integrity. A markup of CTS 1.0.P is provided in the CTS markup of ITS 1.0, but not in the CTS markup of ITS 3.6.1.3. Justification A.13 in the CTS markup of ITS 1.0 states that the definition of Primary Containment Integrity is deleted from the ITS. This is incorrect. The details of the definition with regards to CTS 1.0.P.1, 1.0.P.3 and 1.0.P.4 are relocated to ITS B3.6.1.1 Bases-BACKGROUND and to various ITS 3.6.1.3 SRs which are Less Restrictive (LA)/Administration changes.	Revise the CTS markup of ITS 3.6.1.3 to include a markup of CTS 1.0.P.1, 1.0.P.3, and 1.0.P.4 and provide additional discussion and justification for the Administrative/Less Restrictive changes.	
NPPD Response:					

3.6.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4	M.2	1 Bases 2	CTS 4.7.D.1.a ITS SR 3.6.1.3.5 and Associated Bases CTS 4.7.D.1.a requires verifying the closure time (isolation time) of the PCIVs on a frequency of once per operating cycle (18 months). ITS SR 3.6.1.3.5 will perform this requirement in accordance with the in service Testing Program (IST). This change in frequency is based on the fact that the IST program requires testing of some PCIVs every quarter. Thus the change is considered More Restrictive. While the staff does not dispute that some PCIVs may have to be tested for isolation times on a quarterly frequency, no mention is made in the justification (M.2) as to the isolation time test frequency for the balance of the PCIVs. Will the IST isolation time test frequencies for the balance of the PCIVs be less than once per operating cycle (18 months) (More Restrictive change), 18 months (Administrative change), or greater than 18 months (Less Restrictive)?	Provide additional discussion and justification for the IST isolation time frequency change for those PCIVs that are not tested on a quarterly frequency.	
NPPD Response:					

3.6.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5	M.6	6	CTS 3.7.D STS 3.6.1.3 ACTION I ITS 3.6.1.3 ACTION F ITS 3.6.1.3 ACTION F is proposed to be added to CTS 3.7.D in the event any RA and associated Completion Time cannot be met in MODES 4 and 5. STS 3.6.1.3 Condition I defines the acronym OPDRVs in Condition I. ITS 3.6.1.3 ACTION F removes the phrase "Operation with a potential for draining the reactor vessel (OPDRVs) from Condition F and places it in RA F.1 in place of "OPDRVs." The justification (M.6) states that the only OPDRVs that need to be suspended are those associated with the RHR Shutdown Cooling System. The justification does not provide adequate justification as to why ITS 3.6.1.3 ACTION F should not apply to the other OPDRVs implied by the justification. Since the RAs are connected by an "or" there is no guaranty that RA F.1 will be used for when the RHR valves are inoperable rather than RA F.2. While the staff considers the addition of ITS 3.6.1.3 ACTION F as acceptable, the staff has determined that the modifications made are a generic change which is beyond the scope of review for this conversion.	Delete this generic change.	
NPPD Response:					

3.6.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
6	L.9	4 Bases 6	CTS 1.0.J. CTS 3.7.A.2.a CTS 4.7.A.2.f.3 STS 3.6.1.3 ACTION D and Associated Bases ITS 3.6.1.3 ACTION D and Associated Bases CTS 4.7.A.2.f.3 specifies the MSIV leakage limits while CTS 1.0.J and 3.7.A.2.a specify the remedial actions to take upon discovery of leakage rates exceeding specified limits. CTS 4.7.A.2.f.3 provide additional operability requirements, and remedial actions in which to complete the repairs and retests associated with CTS 4.7.2.f.3. ITS 3.6.1.3 Condition D changes STS 3.6.1.3 Condition D from "Secondary containment bypass leakage rate not within limit" to "One or more penetration flow paths with one or more MSIVs not within leakage limits." Based on STS B.3.6.1.3 Bases RA D.1 discussion, STS 3.6.1.3 Condition D includes both secondary containment and MSIV leakage. Therefore, the proposed change to Condition D is acceptable. However, the change of the Completion Time associated with RA D.1 from 4 hours to an ITS time of 8 hours is not adequately justified. The justification used is consistency with the Completion Time of RA A.1. The Completion Time associated with STS 3.6.1.3 RA D.1 takes into account the safety significance of containment leakage versus valve inoperability. Thus the STS Completion Time for leakage is less than the Completion Time for an inoperable MSIV. In addition, the staff finds this change to be generic and beyond the scope of review for a conversion.	Delete this generic change.	

3.6.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
NPPD Response:					
7		7 Bases 3	STS SR 3.6.1.3.2 and Associated Bases STS SR 3.6.1.3.15 and Associated Bases ITS SR 3.6.1.3.1 and Associated Bases ITS SR 3.6.1.3.11 and Associated Bases STS SR 3.6.1.3.2, SR 3.6.1.3.15 and their associated Bases refer to purge valves. In the same situation ITS SR 3.6.1.3.1, SR 3.6.1.3.11 and their associated Bases refer to purge and vent valves. The justification (7) is based on being consistent with similar guidance in other specifications and not on plant specific considerations. This justification is not applicable to this plant specific case.	Revise the submittal justification to justify the change based on plant special nomenclature.	
NPPD Response:					
8		Bases 1	ITS B3.6.1.3 Bases - RA C.1 and C.2 ITS B3.6.1.3 Bases - RA C.1 and C.2 adds a sentence to the second paragraph. The additional sentence is justified (Bases 1) on editorial clarification. The sentence does not clarify the paragraph and only repeats what is said in the first sentence of the paragraph.	Delete this change.	
NPPD Response:					

3.6.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
9		Bases 1	STS B3.6.1.3 Bases-RA C.1 and C.2 STS B3.6.1.3 Bases-SR 3.6.1.3.3 STS B3.6.1.3 Bases-SR 3.6.1.3.4 ITS B3.6.1.3 Bases-RA C.1 and C.2 ITS B3.6.1.3 Bases-SR 3.6.1.3.2 ITS B3.6.1.3 Bases-SR 3.6.1.3.3 ITS B3.6.1.3 Bases-RA C.1 and C.2 changes the STS B3.6.1.3 Bases-RA C.1 and C.2 words in the third paragraph from "valves and blind flanges" to "isolation devices." Likewise ITS B3.6.1.3 Bases for SR 3.6.1.3.2 and SR 3.6.1.3.3 changes the STS word "PCIV" to "isolation device" in numerous places. In the first case the word change to "isolation devices" was proposed in TSTF 196 which has been rejected by the staff. In the other case, the paragraphs and sentences that refer to "PCIVs" are discussing valves and not blind flanges. Therefore the correct terminology to use is the STS wording "PCIVs." Isolation devices refer to more than just PCIVs and blind flanges.	Delete these changes.	
NPPD Response:					
10		Bases 3	ITS B3.6.1.3 Bases - APPLICABLE SAFETY ANALYSES ITS B3.6.1.3 Bases -REFERENCES See Item Number 3.6.1.1-5	See Item Number 3.6.1.1-5	
NPPD Response:					

3.6.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
11		Bases 3	ITS SR 3.6.1.3.11 STS B3.6.1.3 Bases-LCO ITS B3.6.1.3 Bases-LCO ITS B3.6.1.3 Bases-LCO deletes the following STS B3.6.1.3 Bases-LCO sentence from the second paragraph: "The [18] inch purge valves must be maintained sealed closed [or blocked] to prevent full opening." justification used (Bases 3) is a general addition/deletion justification, which is not applicable in this case. Because of ITS SR 3.6.1.3.11 the deleted statement is partially correct- that portion dealing with valve blockage. Therefore the sentence should be retained in the following form: "The inch 24 inch purge and vent valve is blocked to prevent full opening."	Revise ITS B3.6.1.3 Bases-LCO as proposed to reflect ITS SR 3.6.1.3.11 and provide the appropriate discussion and justification.	
NPPD Response:					

3.6.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
12		Bases 6	STS B3.6.1.3 Bases-SR 3.6.1.3.2 ITS B3.6.1.3 Bases-SR 3.6.1.3.1 The second and third sentences in STS B3.6.1.3 Bases-SR 3.6.1.3.2 state the following: "If a purge valve is open in violation of this SR, the valve is considered inoperable. If the inoperable valve is not otherwise known to have excessive leakage when closed, it is not considered to have leakage outside of limits." ITS B3.6.1.3 Bases-SR 3.6.1.3.1 deletes these sentences based on the justification (Bases 6) of changes made to the specification. This justification is inadequate, since no changes were made to ITS SR 3.6.1.3.1 which would justify these deletions.	Either delete this change or provide additional discussion and justification for this deletion based on current licensing basis, system design or operational constraints.	
NPPD Response:					
13		Bases 6	STS B3.6.1.3 Bases-SR 3.6.1.3.2 ITS B3.6.1.3 Bases-SR 3.6.1.3.1 The third sentence from the end of STS B3.6.1.3 Bases-SR 3.6.1.3.2 states the following: "The [18] inch purge valves are capable of closing in the environment following a LOCA." ITS B3.6.1.3 Bases-SR 3.6.1.3.1 deletes this sentence based on the justification (Bases 6) of changes made to the specification. No changes were made to ITS SR 3.6.1.3.1 which would require this change. In addition, changes made to the ITS B3.6.1.3 Bases-BACKGROUND and ITS SR 3.6.1.3.11 imply that the purge valves automatically close during or following a LOCA.	Delete this change or provide additional discussion and justification for this deletion based on current licensing basis, system design, or operational constraints.	

3.6.1.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
NPPD Response:					
14		Bases 6	STS SR 3.6.1.3.13 and Associated Bases ITS SR 3.6.1.3.10 and Associated Bases The Bases for STS SR 3.6.1.3.13 refers to a Note 1 while STS SR 3.6.1.3.13 does not show a Note. Therefore, the Bases discussion on the Note was deleted from the ITS SR 3.6.1.3.10. This is an error. The Note should be added to ITS SR 3.6.1.3.10 and the discussion retained in the Bases. This Note deals with leakage limit applicability and is associated with ITS 3.6.1.3 ACTIONS Note 4. Also, BWR 16 C.5 corrected this error. This error has been corrected by TSB-13.	Add Note to ITS SR 3.6.1.3.13 and retain Bases description of Note. Provide additional justification and discussion to support this change.	
NPPD Response:					

Cooper Nuclear Station Improved TS Review Comments
ITS 3.6.1.4, Drywell Pressure

3.6.1.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		Bases 2	ITS B3.6.1.4 Bases - Applicable Safety Analyses ITS B3.6.1.4 Bases - REFERENCES See Item Number 3.6.1.1-5	See Item Number 3.6.1.1-5	
NPPD Response:					

Cooper Nuclear Station Improved TS Review Comments
ITS 3.6.1.5, Drywell Air Temperature

3.6.1.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		Bases 1	ITS B3.6.1.5 Bases - APPLICABLE SAFETY ANALYES ITS B3.6.1.5 Bases - REFERENCES See Item Number 3.6.1.1-5	See Item Number 3.6.1.1-5	
NPPD Response:					

Cooper Nuclear Station Improved TS Review Comments
ITS 3.6.1.6, Low-Low Set (LLS) Valves

3.6.1.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		Bases 1	ITS B3.6.1.6 Bases - APPLICABLE SAFETY ANALYSES ITS B3.6.1.6 Bases - REFERENCES See Item Number 3.6.1.1-5	See Item Number 3.6.1.1-5	
NPPD Response:					

Cooper Nuclear Station Improved TS Review Comments
ITS 3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers

3.6.1.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.2	2 Bases 6	CTS 4.7.A.3.a STS SR 3.6.1.7.2 ITS SR 3.6.1.7.2 and Associated Bases CATS 4.7.A.3.a and STS SR 3.6.1.7.2 required performing a functional test of the each vacuum breaker every 3 months/92 days respectively. ITS 3.6.1.7.2 requires this test in accordance with the IST Program. The justification states that the IST Program requires this test quarterly and therefore is equivalent. However, while the IST program frequency is currently quarterly, there is no guaranty that it will remain quarterly. The staff deems this change to be generic and beyond the scope of review for this conversion.	Delete this generic change.	
NPPD Response:					

3.6.1.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	L.1		CTS 3.7.A.3 ITS LCO 3.6.1.7 ITS 3.6.1.7 ACTIONS and Associated Bases CTS 3.7.A.3.a requires to OPERABLE suppression chamber-reactor building vacuum breakers. ITS LCO 3.6.1.7 requires each vacuum breaker be OPERABLE. Since there are a total of 4 reactor building-to-suppression chamber vacuum breakers this change increases the number required OPERABLE vacuum breakers from 2 to 4. CTS 3.7.A.3.b specifies the ACTIONS to be taken when one of the required two reactor building-to-suppression chamber vacuum breakers is inoperable. Thus the CTS allows plant operation with 2 vacuum breakers inoperable and no ACTIONS need to be taken until 3 vacuum breakers become inoperable. The addition of ITS 3.6.1.7 ACTIONS A through D require remedial actions be taken as soon as one out of the four vacuum breakers becomes inoperable. In addition, the justification (L.1) states that the CTS fails to make the distinction between loss of function and loss of redundancy and is therefore "unnecessarily conservative." The staff believes that the CTS is less conservative because of this lack of distinction. Thus, the changes associated with L.1 are More Restrictive changes rather than Less Restrictive changes.	Provide discussion and justification for this More Restrictive change.	
NPPD Response:					

3.6.1.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3		Bases 1	STS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES ITS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES STS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES states that the analytical methods and assumptions involving the reactor building-to-suppression chamber vacuum breakers in the accident analyses are referenced in the FSAR. ITS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES deletes this reference, and just says that the analytical methods and assumptions are used. The justification used to delete this reference is Bases 1, which is a general justification. The Bases needs to either describe the methods and assumptions used or provide a reference to where they can be found. The same change is made in ITS B3.6.1.8 Bases - APPLICABLE SAFETY ANALYSIS (See Item Number 3.6.1.8-5).	Either retain the STS wording or provide the required details in ITS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES. Provide additional discussion and justification as necessary.	
NPPD Response:					
4		Bases 1	ITS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES ITS B3.6.1.7 Bases - REFERENCES See Item Number 3.6.1.1-5	See Item Number 3.6.1.1-5	
NPPD Response:					

3.6.1.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5		Bases 2	STS B3.6.1.7 Bases - LCO ITS B3.6.1.7 Bases - LCO ITS B3.6.1.7 Bases - LCO extensively modifies for enhanced clarity (Justification Bases 2) STS B3.6.1.7 Bases - LCO. The modifications do not provide enhanced clarity and are somewhat confusing. The staff would consider this extensive change as generic and beyond the scope of review for this conversion.	Delete this change.	
NPPD Response:					
6		Bases 4	STS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES ITS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES STS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES specifies the five case that were considered in the safety analyses to determine the adequacy of the external vacuum breakers. ITS B3.6.1.7 Bases - APPLICABLE SAFETY ANALYSES deletes this information entirely. The justification (Bases 4) states that the appropriate analyses are in the UFSAR, and that the discussion in the Bases is not needed. This is incorrect. The discussion is needed in the Bases to provide a degree of understanding on how these technical concerns were addressed at CNS.	Either retain the STS wording, provide plant-specific wording, or appropriate plant specific references for each of the five STS cases or the plant-specific cases. Provide additional discussion and justification as necessary.	
NPPD Response:					

3.6.1.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
7		Bases 5	STS B3.6.1.7 Bases - APPLICABILITY ITS B3.6.1.7 Bases - APPLICABILITY STS B3.6.1.7 Bases - APPLICABILITY justifies the operability of the Reactor Building-to-Suppression Pool vacuum breakers in MODES 1, 2, and 3. Two conditions related to excessive negative pressure necessitate this MODE Applicability, an inadvertent actuation of the Suppression Pool Spray System and depressurization of the drywell. ITS B3.6.1.7 Bases APPLICABILITY states that depressurization of the drywell could occur due to inadvertent actuation of the Drywell Spray System. All mention of inadvertent actuation of the Suppression Pool Spray System inadvertent actuation has been deleted. The justification does not adequately address this deletion except to say that the major concern is a LOCA inside the drywell. The STS does not differentiate between the two conditions, since they are both of concern. In addition, if this is such a major concern why isn't a plant specific LCO proposed for the Drywell Spray System as was done with Browns Ferry ITS? The staff also considers this change to be a potential generic change. In addition, see Item Number S3.6.2.4-1.	Provide additional justification and discussion for this deletion based on current licensing bases, system design or operational constraints.	
NPPD Response:					
8	None	None	CTS 3.7.A.3 ITS 3.6.1.7 and Associated Bases ITS 3.6.1.7 adds a Note to the ACTIONS stating that separate Condition entry is allowed for each line. The CTS does not contain this allowance. No discussion or justification is provided.	Provide discussion and justification for adding the ACTIONS Note.	

Cooper Nuclear Station Improved TS Review Comments
ITS 3.6.1.7, Reactor Building-to-Suppression Chamber Vacuum Breakers

3.6.1.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
NPPD Response:					

3.6.1.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.4 LA.1		CTS 3.7.A.4.c CTS 4.7.A.4.d ITS SR 3.6.1.1.2 Justification A.4 states that CTS 3.7.A.4.c and 4.7.A.4.d are moved to ITS 3.6.1.1 as ITS SR 3.6.1.1.2. Justification LA.1 states that the details of CTS 3.7.A.4.c are moved to the Bases. CTS 4.7.A.4.d is marked in the CTS markup "Moved to ITS 3.6.1.1; A.4." CTS 3.7.A.4.c in the CTS markup is shown as deleted, with no designations or explanation as in CTS 4.7.A.4.d.	Correct these discrepancies.	
NPPD Response:					
2		2	STS 3.6.1.8 RA A.1 ITS 3.6.1.8 RA A.1 ITS 3.6.1.8 RA A.1 makes editorial wording changes to corresponding portions of the STS. The justification is that editorial changes are made for consistency. The change is not consistent with other RAs, is considered generic, and beyond the scope of review for this conversion.	Delete this generic change.	
NPPD Response:					

3.6.1.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3		4	STS SR 3.6.1.8.1 ITS SR 3.6.1.8.1 and Associated Bases STS SR 3.6.1.8.1 requires the vacuum breakers be verified closed every 14 days and after any discharge or steam or any operation causing a vacuum breaker to open. ITS SR 3.6.1.6.1 deletes the second frequency (steam or operational opening). The justification (4) states that this frequency is not needed since ITS SR 3.0.1 would not be met and appropriate actions taken. The justification also states that if conditions exist for the vacuum breakers to be potentially opened, control room operators would be alerted to the possibility and would ensure the vacuum breakers were closed at the completion of the evolution. The SR frequency assures that this is done. Further justification for these frequencies/justifications is that they delay the entering into the appropriate actions based on statements made in the LCO Bases section (See Item Number 3.6.1.8-8). The staff has determined based on the justification that this is a generic change which is beyond the scope of review of a conversion.	Delete this generic change.	
NPPD Response:					

3.6.1.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4		5 Bases 5	STS 3.6.1.8.2 ITS 3.6.1.8.2 and Associated Bases STS SR 3.6.1.8.2 requires a functional test of the vacuum breakers within 12 hours of any discharge of steam into the suppression chamber and following any operation that causes the vacuum breaker to open. ITS SR 3.6.1.6.8.2 deletes these frequencies/conditions. The justification (5) quotes a memorandum from C. E. McCracken to C.I. Grimes, dated 9/8/92, providing the basis for the SR frequency. The staff determined that this was sufficient justification to retain the frequencies/conditions in Revision 1 to NUREG 1433. The licensee provides additional discussion for deleting these frequencies based on the NRC memorandum. Further justification for these frequencies/justifications is that they delay the entering into the appropriate actions based on statements made in the LCO Bases section (See Item Number 3.6.1.6-8). The staff has determined that this is a generic change which is beyond the scope of review for a conversion.	Delete this generic change.	
NPPD Response:					
5		Bases 3	ITS B3.6.1.8 APPLICABLE SAFETY ANALYSES See Item Number 3.6.1.7-3.	See Item Number 3.6.1.7-3.	
NPPD Response:					
6		Bases 3	ITS B3.6.1.3 Bases - APPLICABLE SAFETY ANALYSES ITS B3.6.1.8 Bases - REFERENCES See Item Number 3.6.1.1-5	See Item Number 3.6.1.1-5	

3.6.1.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
NPPD Response:					
7		Bases 4 Bases 6	ITS B3.6.1.8 Bases - APPLICABILITY See Item Numbers 3.6.1.7-7 and S3.6.2.4-1.	See Item Number 3.6.1.7-7 and S3.6.2.4.1	
NPPD Response:					
8		Bases 5	STS B3.6.1.8 Bases - LCO ITS B3.6.1.8 Bases - LCO ITS SR 3.6.1.8.1 The LCO Bases for STS 3.6.1.8 requires the vacuum breakers to be closed except during testing or when performing their intended function. ITS B3.6.1.6 Bases LCO deletes the exception for "during testing or." ITS SR 3.6.1.6.1 verifies that the vacuum breakers are closed. ITS SR 3.6.1.6.1 has a Note associated with it that provides an exception during surveillance testing. The deletion of phrases "during testing or" from the LCO Bases section negates the Note. It should be noted that the same phrase is retained in ITS B3.6.1.7 Bases - LCO.	Return the words "during testing or" to the LCO Bases section.	
NPPD Response:					

3.6.2.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L.2	2 Bases 4	CTS 3.7.A.1.c CTS 3.7.A.1.d CTS 3.7.A.1.e STS LCO 3.6.2.1 STS 3.6.2.1 ACTIONS and Associated Bases ITS LCO 3.6.2.1 ITS 3.6.2.1 Condition A ITS 3.6.2.1 RA B.1 ITS 3.6.2.1 Condition C and Associated Bases CTS 3.7.A.1.c requires a maximum suppression pool temperature of 95°F during normal power operation. CTS 3.7.A.1.d requires a maximum suppression pool temperature of 105°F during testing which adds heat to the suppression pool. CTS 3.7.A.1.e scrams the reactor when the suppression pool temperature reaches 110°F. STS LCO 3.6.2.1.a requires a suppression pool average temperature be ≤ 95°F when any OPERABLE intermediate range monitor (IRM) channel is ≥ 25/40 divisions of full scale on Range 7, while STS LCOs 3.6.2.1.b and c require a suppression pool average temperature be ≤ 105° F when any IRM channel ≥ 25/40 divisions on Range 7 and ≤ 110°F when all IRM channels are ≤ 25/40 divisions on Range 7. ITS 3.6.2.1 changes the IRM criteria in both the LCO and ACTIONS to 1% RTP. Both STS B3.6.2.1 Bases-LCO and justification 2 state that 1% RTP is not readily quantified with much accuracy. However, the Bases states that 25/40 divisions of full scale on IRM Range 7 is a convenient measure of when reactor is providing power essentially equivalent to 1% RTP. Since 1% RTP cannot be readily quantified with much accuracy the STS specifies an acceptable means to determine this. Therefore, the staff finds the ITS change unacceptable and generic. See Item Number 3.6.2.1.3.	Delete this generic change. See Item Number 3.6.2.1-3.	
NPPD Response:					

3.6.2.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	L.3		CTS 4.7.A.1.c CTS 4.7.A.1.c requires an external visual inspection of the suppression chamber whenever there is indication of relief valve operation with the local suppression pool temperature reaching 160°F or greater. L.3 states that ITS 3.6.2.1 does not retain this CTS requirement in accordance with NEDO-30832, "Elimination of Limit on BWR Suppression Pool Temperature for SRV Discharge with Quenchers," dated December 1984. The discussion and justification do not indicate if NEDO-30832 has been reviewed and approved by the staff. It also does not indicate its applicability to CNS. This item may be considered a beyond scope of review item for this conversion since its applicability to CNS may not have been approved by the staff.	Provide additional discussion and justification to show that NEDO-30832 has been reviewed and approved by the staff and its applicability and/or acceptance by the staff for use as CNS.	
NPPD Response:					

3.6.2.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3		2 Bases 4	CTS 3.7.A.1.c CTS 3.7.A.1.d CTS 3.7.A.1.e ITS LCO 3.6.2.1 ITS 3.6.2.1 ACTIONS A, B, and C and Associated Bases CTS 3.7.A.1.c requires a maximum suppression pool temperature of 95°F during normal power operation. CTS 3.7.A.1.d requires a maximum suppression pool temperature of 105° during testing which adds heat to the suppression pool. CTS 3.7.A.1.e scrams the reactor when the suppression pool temperature reacher 110°F. ITS LCO 3.6.2.1.a requires suppression pool average temperature is ≤ 95°F with THERMAL POWER ≥ 1% RTP and performing no testing that adds heat to the suppression pool. ITS LCO 3.6.2.1.b requires suppression pool average temperature ≤ 105°F with THERMAL POWER ≥ 1% RTP and testing that adds heat to the suppression pool. ITS LCO 3.6.2.1.c requires the suppression pool average temperature ≤ 110° F with Thermal Power ≤ 1% RTP. Adding a specific THERMAL POWER level limits to these CTS LCOs is a Less Restrictive change and was not discussed and justified. See Item Number 3.6.2.1-1.	Provide additional discussion and justification for this Less Restrictive change. See Item Number 3.6.2.1-1.	
NPPD Response:					
4		Bases 3	ITS 3.6.2.1 Bases - APPLICABLE SAFETY ANALYSES ITS B3.6.2.1 Bases - REFERENCES See Item Number 3.6.1.1-5	See Item Number 3.6.1.1-5	
NPPD Response:					

3.6.2.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5		Bases 5	STS B3.6.2.1 Bases - RA D.1.D.2 and D.3 ITS B3.6.2.1 Bases - RA D.1, D.2 and D.3 STS B3.6.2.1 Bases - RA D.1, D.2 and D.3 states the following: "Given the high suppression pool average temperature in this Condition..." ITS B3.6.2.1 Bases - D.1, D.2, and D.3 decapitalizes the "C" in "Condition" and justifies it as a typographical error. This is incorrect. The condition referred to is Condition D. Therefore, it should be "Condition" rather than "condition."	Correct this discrepancy.	
NPPD Response:					
6			CTS 3.7.1.c,d,e, and f. ITS LCO 3.6.2.1 ITS 3.6.2.1 ACTIONS A, C, D, and E. CTS 3.7.1.c, d, e, and f specify temperature limits that are expressed as "temperature" without specifying whether the temperature is an average for the suppression pool or a single temperature measurement. ITS LCO 3.6.2.1 and ACTIONS 3.6.2.1 A, C, D, and E specify the temperature limits as "average temperature." No discussion or justification is provided to indicate that the CTS and ITS are equivalent.	Provide additional discussion and justification regarding whether the CTS and ITS are equivalent in how temperature limits are specified.	
NPPD Response:					

3.6.2.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.2 L.1		CTS 3.7.A.1 ITS 3.5.2 CTS 3.7.A.1 specifies that at any time the nuclear system is pressurized or work is being done which has the potential to drain the vessel (OPDRVs) the suppression pool water level shall be within limits except as specified in CTS 3.5.F.5. The applicability that deals with OPDRVs has been moved to ITS 3.5.2 by justification A.2 which is acceptable. The exception for CTS 3.5.F.3 is also moved to ITS 3.5.2 but it is justified by an L.1. L.1 states that this is an Administrative Change that deals with OPDRVs. The staff agrees that the change is Administrative not Less Restrictive and believes that justification A.2 is the appropriate change designation.	Revise the CTS markup to indicate that the change "except as specified in...and 3.5.f.5." is an Administrative change (A.2).	
NPPD Response:					
2		Bases 3	ITS B3.6.2.2 Bases-APPLICABLE SAFETY ANALYSES ITS B3.6.2.2 Bases - REFERENCES See Item Number 3.6.1.1-5	See Item Number 3.6.1.1-5	
NPPD Response:					

3.6.2.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	M.1	1 Bases 4	STS 3.6.2.3 ACTION B ITS 3.6.2.3 ACTIONS B and C and Associated Bases STS 3.6.2.3 ACTION B requires a shutdown if the RAs and associated Completion Times are not met and for two RHR Suppression Pool Cooling subsystems inoperable (loss of function). ITS 3.6.2.3 breaks STS 3.6.2.3 ACTION B up into two ACTIONS - ACTION B - two subsystems inoperable (loss of function) and ACTION C - RAs and Completion Times not met. ACTION B instead of requiring a shutdown per the STS, requires the restoration of one RHR subsystem to OPERABLE status within 8 hours. The justification used (1) provides a number of reasons to allow this change. In addition, other BWR/4 conversions have proposed this same change using the stated reasons as well as others. In all cases, the staff finds that total loss of RHR Suppression Pool Cooling requires an immediate shutdown. It is the staff's understanding that this change was submitted to the OGs as a TSTF and was rejected. Therefore, the change is unacceptable and is considered a generic change that is beyond the scope of review for this conversion.	Delete this generic change.	
NPPD Response:					
2		Bases 2	ITS B3.6.2.3 Bases - APPLICABLE SAFETY ANALYSES ITS B3.6.2.3 Bases REFERENCES See Item Number 3.6.1.1-5.	See Item Number 3.6.1.1-5.	
NPPD Response:					

3.6.2.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3		Bases 3	STS B3.6.2.3 Bases - RA A.1 ITS B3.6.2.3 Bases RA A.1 STS B3.6.2.3 Bases - RA A.1 states the following: "In this Condition, the remaining RHR..." ITS B3.6.2.3 Bases-RA C.1 decapitalizes the letter "C" in "Condition". This is incorrect. The sentence is referring to Condition A; therefore, the "C" in "Condition" should be capitalized.	Correct this discrepancy.	
NPPD Response:					
4		Bases 6	STS B3.6.2.3 Bases - SR3.6.2.3.2 ITS B3.6.2.3 Bases - SR 3.6.2.3.2 STS B3.6.2.3 Bases - SR 3.6.2.3.2 states that the inservice inspections of the RHR Pump trend performance. ITS B3.6.2.3 Bases - SR3.6.2.3.2 deletes the reference to performance trending. The justification (Bases 6) states that the change is revised to be consistent with the specifications. This justification is inadequate and does not apply in this case.	Provide additional discussion and justification for this change.	
NPPD Response:					
5		Bases 7	ITS B3.6.2.3 Bases - LCO A paragraph has been added to ITS B3.6.2.3 Bases-LCO which discusses RHR OPERABILITY in Mode 3 when below the actual RHR shutdown cooling permissive pressure. The justification used (Bases 7) states that the addition is an editorial change for clarity. The change is not an editorial clarity change, but a technical change. As such, the staff finds the change to be generic and beyond the scope of review for this conversion.	Delete this generic change.	
NPPD Response:					

S3.6.2.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	R.1	1 Bases 1	CTS 3/4.5.A STS 3.6.2.4 and Associated Bases CTS 3.5.A specifies the OPERABILITY requirements for the Core Spray and LPCI Systems. CTS 4.5.A.3 specifies the surveillance required to determine Drywell and Suppression Pool Spray System OPERABILITY - RHR pump tests (CTS 4.5.A.3.b and d) and air test of spray header (CTS 4.5.A.3.f). STS 3.6.2.4 specifies the OPERABILITY requirement for the RHR Suppression Pool Spray. ITS 3.6. does not include STS 3.6.2.4 based on the premise (R.1) that CTS 4.5.A 3.f does not meet the Criterion specified in 10 CFR 50.36(c)(2)(ii). This justification is incomplete in that it does not address the other aspects of the RHR Suppression Pool Spray System and Drywell Spray System encompassed by CTS 3/4.5.A. In addition, the staff has determined and stated in the Bases of STS B3.6.2.4 that the RHR Suppression Pool Spray System does meet Criterion 3 of 10 CFR 50.36(c)(2)(ii). Since this system was in the CTS and the staff determination is that it meets Criterion 3, this specification should be included in the ITS. However, STS 3.6.2.4 of NUREG-1433 may not be the appropriate TS in the CNS case, STS 3.6.1.7 "RHR Containment Spray System" of NUREG-1434 (BWR-6) may be the more appropriate TS to use. Also, consideration should be given to adding a separate LCO for Drywell Spray System. See Item Number 3.6.1.7-7.	Include CTS 3/4.5.A in ITS 3.6. Provide additional discussions and justifications for any changes made to the CTS/STS.	
NPPD Response :					

3.6.3.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		1 Bases 4	STS 3.6.3.3 ITS 3.6.3.1 The change in numbering from STS 3.6.3.3 (Primary Containment Oxygen Concentration) to ITS 3.6.3.1 will depend on the resolution of Item Number S3.6.3.2-1	See Item Number S3.6.3.2-1.	
NPPD Response:					
2		Bases 1	STS B3.6.3.3 Bases - BACKGROUND ITS B3.6.3.3 Bases - BACKGROUND STS B3.6.3.3 Bases - BACKGROUND references certain STS LCO one of which is STS LCO 3.6.3.2 "Drywell Cooling System Fans". The ITS deletes this reference based on the justification that STS 3.6.3.2 is not included in the CNS ITS. This deletion will depend on the resolution of Item Number S3.6.3.2-1.	See Item Number S3.6.3.2-1.	
NPPD Response:					
3		Bases 2	ITS B3.6.3.1 Bases - APPLICABLE SAFETY ANALYSES ITS B3.6.3.1 Bases - REFERENCES See item Number 3.6.1.1-5.	See Item Number 3.6.1.1-5.	
NPPD Response:					

Cooper Nuclear Station Improved TS Review Comments
STS 3.6.3.2, Drywell Cooling System Fans

S3.6.3.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		1 Bases 1	STS 3.6.3.2 and Associated Bases STS 3.6.3.2 specifies the requirements and surveillances for Drywell Cooling System Fans. The ITS does not contain this specification. The justification (1) used states that CNS does not assume Drywell Cooling System Fans are available to assure adequate mixing. STS B3.6.3.2 Bases APPLICABLE SAFETY ANALYSES states that even though no credit for mechanical mixing is assumed in the analysis, the system does meet Criterion 3 of 10 CFR 50.36(c)(2)(ii), for other reasons.	Provide additional discussion and justification for this deletion based on current licensing bases, system design or operational constraints.	
NPPD Response:					

3.6.4.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.5 A.13 M.6	4 Bases 1 Bases 5	CTS 1.0.V ITS 3.6.4.1 CTS 3.7.C.1 ITS 3.6.4.2 CTS 3.7.B.1 ITS 3.6.4.3 CTS 1.0.V defines Secondary Containment Integrity. A markup of CTS 1.0.V is provided in the CTS markup of ITS 1.0, but not in the CTS markups of ITS 3.6.4.1, 3.6.4.2 and 3.6.4.3. Justification A.5 in the CTS markup of ITS 3.6.4.1 and 3.6.4.2 and justification A.13 in the CTS markup of ITS 1.0 both state that the definition of Secondary Containment Integrity is deleted from the ITS. This is incorrect. The details of the definition with regard to 1.0.V.1 is encompassed by ITS SR 3.6.4.1.3, 1.0.V.2 is encompassed by ITS LCO 3.6.4.3 and 1.0.V.3 is encompassed by ITS LCO 3.6.4.2, ITS SR 3.6.4.2 2 and ITS SR 3.6.4.2.3. These Administrative changes either have not been justified, or are characterized as More Restrictive changes. See Item Numbers 3.6.4.1-4, 3.6.4.2-2 and 3.6.4.3-2.	Revise the CTS markup of ITS 3.6.4.1, 3.6.4.2, and 3.6.4.3 to include a markup of CTS 1.0.V and provide additional discussion and justification for these Administrative changes. See Item Numbers 3.6.4.1-4, 3.6.4.2-2 and 3.6.4.3-2.	
NPPD Response:					
2	M.4		CTS 3.7.C.1 CTS 3.7.C.1.e.b ITS 3.6.4.1 APPLICABILITY ITS 3.6.4.1 ACTION C Justification M.4 states that a new APPLICABILITY is proposed to be added to CTS 3.7.C.1 (ITS 3.6.4.1) and a corresponding Condition (ITS 3.6.4.1 Condition C) and Required Actions (ITS 3.6.4.1 RA C.3) for Operations with the Potential for Draining the Reactor Vessel (OPDRVs). The CTS markup does not show these changes and the M.4 change that is shown (CTS 3.7.C.1.e.b) has nothing to do with these changes. See Item Number 3.6.4.1-3.	Revise the CTS markup to include these More Restrictive changes. See Item Number 3.6.4.1-3.	

3.6.4.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
NPPD Response:					
3	M.4		CTS 3.7.C.1.e.b ITS 3.6.4.1 RA C.1 Note CTS 3.7.C.1.e.b specifies the remedial actions for an inoperable secondary containment when moving irradiated fuel or during core alterations. A statement is provided in CTS 3.7.C.1.e.b that the provisions of CTS 1.0.J are not applicable. CTS 1.0.J is the shutdown requirement of the CNS TS. The CTS markup shows this as becoming ITS 3.6.4.1 RA C.1 Note "LCO 3.0.3 is not applicable" and is designated M.4. ITS LCO 3.0.3 and CTS 1.0.J are basically the same requirement. Thus the ITS 3.6.4.1RA C.1 Note and the CTS statement on 1.0.J are the same. Thus the change is an Administrative change rather than a More Restrictive change. See Item Number 3.6.4.1-2.	Revise the CTS markup to show this change as an Administrative change and provide discussion and justification for this Administrative change.	
NPPD Response:					
4	M.6	4 Bases 1 Bases 5	CTS 1.0.V.1 STS SR 3.6.4.1.3 and Associated Bases ITS SR 3.6.4.1.3 and Associated Bases STS SR 3.6.4.1.3 verifies that the secondary containment access doors are closed except when it is being used for entry or exit, then at least one door shall be opened. ITS SR 3.6.4.1.2 and its associated Bases modifies STS SR 3.6.4.1.3 and its associated Bases based on CTS 1.0.V.1 and TSTF 18. TSTF 18 has been rejected by the staff.	Delete the TSTF 18 changes or provide additional discussion and justification for the deviations from the STS.	
NPPD Response:					

3.6.4.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5	LA.2	ITS B3.6.4.3 Bases 1	CTS 4.7.C.1.c ITS B3.6.4.3 Bases - BACKGROUND CTS 4.7.C.1.c specifies details regarding wind conditions when verifying Secondary Containment integrity. These details (calm wind between 2 and 5 mph) are not included in ITS SR 3.6.4.1.4. The justification (LA.2) states that the design details are moved to the Bases for ITS 3.6.4.3. However, ITS B3.6.4.3 Bases - BACKGROUND states that wind conditions are "neutral wind conditions" which the staff defines as Omph, which is a Less Restrictive change.	Provide additional discussion and justification for this Less Restrictive change.	
NPPD Response:					
6		Bases 3	ITS B3.6.4.1 Bases - APPLICABLE SAFETY ANALYSES ITS B3.6.4.1 Bases - REFERENCES See Item Number 3.6.1.1-5.	See Item Number 3.6.1.1-5.	
NPPD Response:					
7		Bases 4	ITS B3.6.4.1 Bases - SR 3.6.4.1.1 The following statement is added to ITS B3.6.4.1 Bases - SR 3.6.4.1.1: "Momentary transients on the installed...failure to meet this SR." The justification used (Bases 4) to add this statement is an editorial clarity justification. This justification is inadequate for this technical change, which is not specified in the CTS.	Provide additional discussion and justification for this technical change.	
NPPD Response:					

3.6.4.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
8			CTS 3.7.C.1.e ITS 3.6.4.1 ACTION C CTS 3.7.C.1.e requires the restoration of secondary containment integrity within 4 hours or suspend fuel handling operations and core alterations. ITS 3.6.4.1 ACTION C requires the immediate suspension of fuel handling, core alterations and OPDRVs with no time is allowed to restore secondary containment. Thus ITS 3.6.4.1 ACTION C is More Restrictive than CTS 3.7.C.1.e. No discussion or justifications are provided for this More Restrictive change.	Provide a discussion and justification for this More Restrictive change.	
NPPD Response:					

3.6.4.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.4		CTS 3.7.C.1 ITS 3.6.4.2 ACTION Note 2 A new Note is proposed to be added to CTS 3.7.C.1 as proposed ITS 3.6.4.2 Note 2. Note 2 provides explicit instructions (separate Condition entry for each flow path) for the proper application of the ACTIONS for TS compliance. This change is classified as an Administrative change that is consistent with the intent of the CTS ACTIONS for inoperable secondary containment isolation valves. This justification is incorrect. The wording of CTS 3.7.C.1 and in particular CTS 3.7.C.1.e does not convey the implicit or explicit instructions to allow separate Condition entry for each secondary containment flow path. Thus the addition is considered as a Less Restrictive change.	Provide a discussion and justification for this Less Restrictive change.	
NPPD Response:					
2	A.5 A.13 M.5		^TS 1.0.V.3 ITS SR 3.6.4.2.2 CTS 3.7.C.1 ITS SR 3.6.4.2.3 ITS LCO 3.6.4.2 See Item Number 3.6.4.1-1.	See Item Number 3.6.4.1-1.	
NPPD Response:					
3		Bases 1	ITS B3.6.4.2 Bases - APPLICABLE SAFETY ANALYSES ITS B3.6.4.2 Bases - REFERENCES See Item Number 3.6.1.1-5.	See Item Number 3.6.1-1-5.	
NPPD Response:					

3.6.4.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4		Bases 1	STS B3.6.4.2 Bases - APPLICABILITY ITS B3.6.4.2 Bases - APPLICABILITY The last sentence in STS B3.6.4.2 Bases - APPLICABILITY states the following: "Moving irradiated fuel assemblies in the [secondary] containment may also occur in MODES 1, 2, and 3." ITS B3.6.4.2 Bases - APPLICABILITY deletes this sentence and justifies the deletion on the basis of a plant specific nomenclature, etc. This is a just an inadequate justification, since the statement is a true statement.	Provide additional discussion and justification for this deletion based on current licensing basis, system design or operational constraints.	
NPPD Response:					
5		Bases 4	STS B3.6.4.2 Bases - RA B.1 ITS B3.6.4.2 Bases - RA B.1 The last sentence of STS B3.6.4.2 Bases - RA B.1 states: "This clarifies that only Condition A is entered if one SCIV is inoperable in each of two penetrations." ITS B3.6.4.2 Bases -RA B.1 modifies the end of the sentence as follows: "...if only one SCIV is inoperable in multiple penetrations." The change is justified on the basis of enhanced editorial clarity. The staff concludes that the change does not clarify the sentence.	Delete the change.	
NPPD Response:					

3.6.4.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
6		Bases 4	STS B3.6.4.2 Bases - SR 3.6.4.2.2 ITS B3.6.4.2 Bases - SR 3.6.4.2.2 The last sentence of STS B3.6.4.2 Bases - SR 3.6.4.2.2 states: "The isolation time and frequency of this SR are in accordance with the Inservice Testing Program..." ITS B3.6.4.2 Bases - SR 3.6.4.2.2 deletes the words "isolation time and" using the justification of editorial clarity/consistency. The deletion is unacceptable. The wording of the sentence assumes that the isolation times for the SCIVs are specified in the IST program. Therefore the words must stay.	Retain the STS wording or provide plant specific wording specifying the location of the SCIVs isolation times. Provide additional discussion and justification as appropriate.	
NPPD Response:					

3.6.4.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.5	2 3 Bases 1 Bases 5	CTS 4.7.B.4.b STS SR 3.6.4.3.4 ITS SR 3.6.4.3.4 and Associated Bases CTS 4.7.B.4.b requires demonstrating manual OPERABILITY of the bypass valve for SGT subsystems filter cooling. STS SR 3.6.4.3.4 would meet this CTS requirement. However, STS SR 3.6.4.3.4 is modified by ITS SR 3.6.4.3.4 to require verifying the SGT units cross tie damper is in the correct position, and each SGT room air supply check valve and SGT dilution air shutoff valve can be opened. In addition, a Note is added to ITS SR 3.6.4.3.4 which specifies that the SR is not required when one SGT subsystem is isolated. Insufficient information is provided in the justifications and the ITS B3.6.4.3 Bases to assure the staff that the conversion from CTS 4.7.B.4.b to ITS SR 3.6.4.3.4 is correct.	Provide additional discussion and justification including an updated SGT System description and appropriate P&IDs to show that the conversion from CTS 4.7.B.4.b to ITS SR 3.6.4.3.4 is correct.	
NPPD Response:					
2	A.13		CTS 1.0.P.2 ITS LCO 3.6.4.3 See Item Number 3.6.4.1-1	See Item Number 3.6.4.1-1	
NPPD Response:					

3.6.4.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	L.1		CTS 3.7.B.3 CTS 3.10.E When one SGT subsystem is inoperable, CTS 3.7.B.3 and 3.10.E require the diesel generator (DG) for the redundant SGT subsystem be OPERABLE. If this is not met, the CTS definition of LCO requires immediately entering a shutdown path. This requirement is not included in ITS 3.6.4.3 but is moved to ITS 3.8.1, AC Sources- Operating. The justification for this change is designated L.1. This is incorrect. The change is an Administrative change. Any changes to the requirements with regard to DG OPERABILITY need to be discussed in ITS 3.8.1, not ITS 3.6.4.3.	Revise the submittal to show this change as an Administrative change.	
NPPD Response:					
4	L.2 L.3		CTS 4.10.E ITS 3.6.4.3 R.A. C.1 CTS 4.10.E. requires periodically verifying the OPERABILITY of the other SGT subsystem when one SGT subsystem is inoperable during fuel handling operations. This Surveillance Requirement is not adopted in ITS 3.6.4.3. This is not entirely correct. ITS 3.6.4.3 RA C.1 allows the option of placing the other SGT subsystem in operation rather than suspending fuel handling operations. This is discussed as part of justification L.3. Thus even though periodically verifying the OPERABILITY of the other SGT subsystem is not required by the ITS under certain circumstances CTS 4.10.E is used as stated above.	Revise CTS submittal to show that CTS 4.10.E is modified by L.3. Revise justification L.2 to account for the unique circumstances of L.3.	
NPPD Response:					

3.6.4.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5		Bases 1	ITS B3.6.4.3 Bases - BACKGROUND See Item Number 3.6.4.1-5.	See Item Number 3.6.4.1-5	
NPPD Response:					
6		Bases 1	ITS B3.6.4.3 Bases - APPLICABLE SAFETY ANALYSES ITS B3.6.4.3 Bases - REFERENCES See Item Number 3.6.1.1-5	See Item Number 3.6.1.1-5	
NPPD Response:					
7		Bases 3	STS B3.6.4.3 Bases - RA A.1 ITS B3.6.4.3 Bases - RA A.1 STS B3.6.4.3 Bases - RA A.1 states the following: "In this Condition, the remaining..." ITS B3.6.4.3 Bases -- RA C.1 decapitalizes the letter "C" in "Condition". This is incorrect. The sentence is referring to Condition A; therefore, the "C" in Condition" should be capitalized.	Correct this discrepancy.	
NPPD Response:					

3.6.4.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
8			CTS 3.7.A.2.b ITS 3.6.4.3 ACTIONS CTS 3.7.A.2.b allows the Drywell and Suppression Chamber Purge and Vent Systems to be in operation with the 24 inch supply and exhaust valves open provided that if the venting and purging is through the SGT System, both SGT trains shall be OPERABLE and only one SGT train shall be in operation. Based on the CNS CTS if one SGT subsystem is inoperable, then one of the following actions would be taken with regard to venting and purging of containment: a. The Venting and Purging System is realigned such that the 2 inch bypass lines are utilized per the *Note to CTS 3.7.A.2.b, b. Venting and purging is suspended until two SGT Systems are restored to OPERABLE status, or c. The plant is shutdown in accordance with CTS 1.0.J. This particular condition is plant specific and is not addressed in the ACTIONS for ITS 3.6.4.3, nor are justifications and discussions provided for not including this condition in ITS 3.6.4.3. See Item Number 3.6.1.3-1 and 3.6.1.3-2 for additional concerns with regard to this condition.	Revise the CTS/ITS markup to address CTS 3.7.A.2.b in ITS 3.6.4.3 and provide appropriate discussions and justifications for the retention of this condition and associated remedial measures in ITS 3.6.4.3 ACTIONS. See Item Numbers 3.6.1.3-1 and 3.6.1.3-2.	
NPPD Response:					

3.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	LA.1		CTS 3/4.6.H, Shock Suppressors (Snubbers) DOC LA.1 states that the snubber requirements of CTS 3/4.6.H are to be relocated from the CTS to the TRM, provides a justification for the relocation, and states that the relocated requirements are not required to be included in the ITS to provide adequate protection of the public health and safety. Why isn't this change classified and justified as an "R," i.e., a ***true*** relocated change?	Please reclassify this change as an "R" and modify the justification to address the TS criteria, or provide an explanation as to why this change should not be classified as an "R".	
NPPD Response:					

Cooper Nuclear Station Improved TS Review Comments
ITS 3.7.1, Residual Heat Removal Service Water Booster (RHRSWB) System

3.7.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		1	CTS 3.5.B CTS 4.5.B STS LCO 3.7.1 STS 3.7.1 Actions C and D STS SR 3.7.1.1 ITS LCO 3.7.1 ITS 3.7.1 Actions A and B ITS SR 3.7.1 The nomenclature for the system in CTS 3.5.B, CTS 4.5.5, STS 3.7.1 , LCO, Actions C and D, and SR 3.7.1.1 is Residual Heat Removal Service Water (RHRSW) System. The nomenclature in the ITS is Residual Heat Removal Service Water Booster (RHRSWB) System. No justification for the change to the CTS is provided. The justification for the deviation from the STS is that the change reflects plant specific nomenclature. This statement is not consistent with the CTS.	Provide plant specific justification for changing the nomenclature of the system.	
NPPD Response:					
2	M.2	1	STS SR 3.7.1.1 ITS SR 3.7.1.1 STS SR 3.7.1.1 is applicable to manual, power operated, and automatic valves in the RHRSW flow path. ITS 3.7.1.1 does not include automatic valves. The justification states that the change is made to reflect plant specific system description. This implies that there are no automatic valves in the RHRSW system , but it isn't explicitly stated.	Explicitly state whether the RHRSW system contains automatic valves and if it does, provide justification for not including them in ITS SR 3.3.1.1.	
NPPD Response:					

3.7.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3		3	STS 3.7.1 Required Actions C.1 and D.1 ITS 3.7.1 Required Actions A.1 and B.1 The marked up copy of STS 3.7.1 indicates that the note for Required Actions C.1 and D.1 are repositioned in ITS 3.7.1 Required Actions A.1 and B.1 to be consistent with the Writers Guide. However, the notes are not repositioned in the smooth copy of ITS 3.7.1.	It is the STS convention to place such notes in the Required Action column. Please revise the STS markup and eliminate JFD 3 to be consistent with the smooth copy of the ITS.	
NPPD Response:					
4	L.1	2	CTS 3.5.B.1 CTS 3.5.B.2 STS 3.7.1 Actions A and C ITS 3.7.1 Actions Both the CTS (CTS 3.5.B.1, CTS 3.5.B.2) and STS 3.7.1 Action A allow thirty days to restore an inoperable RHRSWB pump. STS 3.7.1 Action C is an additional requirement to address one inoperable RHRSW system for reasons other than an inoperable RHRSW pump. ITS 3.7.1 does not include the condition of one inoperable RHRSW pump nor the STS allowance to restore in 30 days. The justification states that only one pump in each subsystem (2 pumps) is required by the analyses. This justification is based, in part, on GENE 637-045-1293. This is a change to both the CTS and STS.	This change is beyond the scope of the conversion review and has been referred to the Project Manager for resolution.	
NPPD Response: None required at this time.					

Cooper Nuclear Station Improved TS Review Comments
ITS 3.7.1, Residual Heat Removal Service Water Booster (RHRSWB) System

3.7.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
5	M.1		CTS 3.5.B.3 ITS 3.7.1 Required Actions A.1 and B.1 The proposed change adds a note requiring the applicable Conditions and Required Actions of LCO 3.4.7 to be entered for an RHR SDC subsystem made inoperable by the inoperable RHRSWB System. The justification states that this is a more restrictive change because it is an added requirement to cascade to LCO 3.4.7.	Explain why you would *not* enter the Actions for an inoperable RHR SDC subsystem in the same circumstance under your CTS. The staff does not believe that this is a more restrictive change.	
NPPD Response:					

3.7.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L.4		CTS 3.12.C.2 ITS 3.7.2 ITS 3.8.1 Required Action B.2 With any inoperable active component that affects operability of one SW subsystem, CTS 3.12.C.2 requires that all active components that affect operability of the operable subsystem (the other subsystem), including the associated DG, be operable. These requirements are deleted in ITS 3.7.2 but are included in ITS 3.8.1 Required Action B.2. The justification for this change incorrectly states that the CTS requires ensuring operability of required features in the same division as an inoperable DG. The CTS actually requires ensuring operability of required features in the same division as the operable DG.	Revise the justification to correctly state the CTS requirement.	
NPPD Response:					
2		2	STS 3.7.2 Required Action D.1 ITS 3.7.2 Required Action A.1 The bracketed words "RHR shutdown cooling" in STS 3.7.2 Required Action D.1 are modified in ITS 3.7.2 Required Action A.1 to "RHR shutdown cooling subsystem." The justification provided for this change does not appear appropriate and the change makes the wording of this note inconsistent with the wording of similar notes in other specifications (e.g., ITS 3.7.1).	Revise the submittal to adopt the STS wording.	
NPPD Response:					

3.7.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	L.1	5	CTS 3.12.C.2 STS 3.7.2 Required Action D.1 ITS 3.7.2 Required Action A.1 CTS 3.12.C.2 allows continued operation for 30 days with one inoperable SW pump. With one SW subsystem (two inoperable SW pumps) the CTS requires shutdown to Mode 4 within 36 hours, STS 3.7.2 Required Action D.1 allows operation to continue indefinitely with one inoperable SW pump and continued operation for 72 hours with one inoperable SW subsystem. If STS Required Action D.1 is not met STS Required Action E.2 requires shutdown to Mode 4 within 36 hours. This is modified by ITS 3.7.2 Required Action A.1 to allow continued operation for 7 days with one inoperable SW subsystem. The ITS changes both the CTS and the STS. In addition ITS 3.7.2 Required Action A.1 extends the CTS Completion Time for shutdown by 7 days.	This change is beyond the scope of the conversion review and has been referred to the Project Manager for resolution.	
NPPD Response: None required at this time.					
4	L.1	2	CTS 3.12.C.2 and C.3 STS 3.7.2 Actions A, B and D ITS 3.7.2 Actions CTS 3.12.C.2 and 3.12.C.3 require all SW pumps to be operable and provide actions if one or two SW pumps are inoperable. STS 3.7.2 Actions A (also referenced in Action D) and B have Required Actions if one SW pump is Inoperable or if one SW pump in each subsystem (two SW pumps inoperable). These Actions are not retained in ITS 3.7.2. This is a change to both the CTS and STS.	This change is beyond the scope of the conversion review and has been referred to the Project Manager for resolution.	
NPPD Response: None required at this time.					

Cooper Nuclear Station Improved TS Review Comments
ITS 3.7.3, Reactor Equipment Cooling (REC) System

3.7.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L.1	4	CTS 3.12.B.1 and B.2 STS 3.7.2 Actions A and B ITS 3.7.3 Action A CTS 3.12.B.1 and CTS 3.12.B.2 allow 30 days to restore and inoperable REC pump. STS 3.7.2 Action A provides the same 30-day allowance for an inoperable pump. This requirement is replaced in ITS 3.7.3 Action A to allow 72 hours to restore one inoperable REC subsystem. The justification states that the change is based on the fact the either REC loop has sufficient capacity with one pump operating to transfer the essential services design cooling load during postulated transient or accident conditions. The justification also states "If one of the two subsystems is Inoperable, currently no time is allowed and a shutdown is required." This statement appears to be incorrect because CTS 3.12.B.2 allows an inoperable active component for 30 days if the other subsystem, the Core Standby Cooling Systems, and the associated DG are operable. This is a change to both the CTS and the STS.	This change is beyond the scope of the conversion review and has been referred to the Project Manager for resolution.	
NPPD Response: None required at this time.					

Cooper Nuclear Station Improved TS Review Comments
ITS 3.7.3, Reactor Equipment Cooling (REC) System

3.7.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	L.4		CTS 3.12.B.2 ITS 3.7.3 CTS 3.12.B.2 contains requirements to ensure that all active component that affect operability of the ECCS Systems and the DG associated with the operable subsystem are operable. These requirements are not retained in ITS 3.7.3. The justification incorrectly refers to the RHRSWB pumps instead of the REC pumps. Also, the CTS markup does not incorporate all of the text related to this change (i.e., text referring to the operability of the Core Standby Cooling Systems).	Correct the justification and the CTS markup.	
NPPD Response:					

Cooper Nuclear Station Improved TS Review Comments
ITS 3.7.6, Spent Fuel Storage Pool Water Level

3.7.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L.1		CTS 3.10.C ITS 3.7.6 Applicability CTS 3.10.C states that the applicability is whenever irradiated fuel is stored in the spent fuel pool. ITS 3.7.6 states that the applicability is during movement of irradiated fuel assemblies in the spent fuel storage pool. The justification (and the Bases) is based on satisfying the analysis of the fuel handling accident but does not address how water level is maintained when fuel assemblies are not being moved.	Provide additional discussion that addresses how minimum water level will be maintained when fuel assemblies are not being moved after ITS implementation (i.e., what is happening to the CTS requirement for this situation).	
NPPD Response:					

3.7.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	A.2	Bases 2	CTS 3.10.C ITS LCO 3.7.6 and associated Bases CTS 3.10.C specifies that spent fuel pool level be maintained 8.5 ft above the top of the fuel. ITS LCO 3.7.6 requires that spent fuel storage pool water level be ≥ 22 ft 5 inches over the top of the irradiated fuel assemblies seated in the spent fuel storage pool racks. The justification states that 8.5 ft above a bundle being handled by the refueling bridge grapple is approximately 22 ft 5 inches above the top of irradiated fuel seated in the spent fuel pool. Also, the Background section of the Bases for ITS 3.7.6 states that the water level above the irradiated fuel assemblies is an ***implicit*** assumption of the fuel handling accident. The STS Bases refer to the water level as an explicit assumption.	Provide additional discussion of the fuel handling accident analysis assumptions that demonstrate that the ITS value is the appropriate technical specification limit.	
NPPD Response:					

3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	L.1		CTS 3.9.B.1.b ITS 3.8.1 Action C CTS 3.9.B.1.b requires verifying operability of the diesel generators and associated critical buses. ITS 3.8.1 Action C does not require verifying the associated critical buses are OPERABLE. No discussion or justification is provided for deleting this requirement.	Provide additional discussion and justification for deleting the requirement.	
NPPD Response:					
2		2	STS SR 3.8.1.2 Note 2 ITS SR 3.8.1.2 Note 2 STS SR 3.8.1.2 Note 2 indicates that a modified start may be used for this SR as recommended by the manufacturer. When modified start procedures are not used, the time, voltage, and frequency tolerances of SR 3.8.1.7 must be used. The corresponding note in ITS SR 3.8.1.2 states that a modified start may be used for this SR consistent with the manufacturer's recommendations. When modified start procedures are not used, the time, voltage, and frequency requirements of SR 3.8.1.7 must be used. These changes in wording are not justified.	This is not a justifiable plant-specific or editorial difference. Revise the submittal to adopt the STS wording.	
NPPD Response:					

3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	A.11		CTS 1.0.J CTS 3.9.B.1 CTS 3.9.B.2 ITS 3.8.1 Condition G CTS 3.9.B.1 and 3.9.B.2 do not provide Actions for the condition of three or more AC sources inoperable. However CTS 1.0.J requires being in Mode 3 within 6 hours and Mode 4 within 36 hours when either the emergency or normal AC power source for one train of a system is inoperable and the redundant train of the system is inoperable (because of an inoperable support system or because the system itself is inoperable or because one of its AC sources is inoperable). ITS 3.8.1 Condition G is added to direct entry into LCO 3.0.3 for the condition of three or more AC sources inoperable. ITS LCO 3.0.3 requires being in Mode 3 within 13 hours and Mode 4 within 37 hours. This is a less restrictive change because an additional hour is allowed to complete the shutdown.	Revise the submittal with a L-type DOC to justify the longer shutdown Completion Times.	
NPPD Response:					

3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4	A.4	3	CTS 4.9.A.2.a.1 CTS 4.9.A.2.a.2 STS SR 3.8.1.2 Note 1 ITS SR 3.8.1.2 CTS 4.9.A.2.a.1 and CTS 4.9.A.2.a.2 state that CTS 4.9.A.2.a.2 (DG timed start test), satisfies CTS 4.9.A.2.a.1 (DG modified start test). This statement is omitted from corresponding ITS SR 3.8.1.2, the modified start test. This results in a STS deviation because STS SR 3.8.1.2 Note 1 states that performance of SR 3.8.1.7 satisfies SR 3.8.1.2. The justification for deleting this statement from the CTS and STS is not plant specific or editorial.	Revise the submittal to adopt STS SR 3.8.1.2 Note 1, which is consistent with CTS.	
NPPD Response:					
5	M.5	8	CTS 4.9.A.2.a.1 CTS 4.9.A.2.a.2 STS SR 3.8.1.3 ITS SR 3.8.1.3 CTS 4.9.A.2.a.1 and CTS 4.9.A.2.a.2 state that each diesel shall be started and loaded to $\geq$50% rated load. ITS SR 3.8.1.3 states that the EDG is loaded to greater than the 'assumed accident load'. This differs from STS SR 3.8.1.3 which indicates, by brackets, that plant-specific load values should be provided. DOC M.5 states that the specific values are in plant procedures and the Bases. The only load values given in the Bases are in the Bases Background discussion of DG load vs. time ratings. It is unclear which of these correspond to the 'assumed accident load'.	Revise the submittal to include specific load values in SR 3.8.1.3, consistent with the STS and the 'assumed accident load'. In the response, state the 'assumed accident load' and where it is stated in the Bases.	
NPPD Response:					

3.8.1	OOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
6	M.10	8	CTS 4.9.A.2.a.1 & 4.9.A.2.a.2 STS SR 3.8.1.2 & SR 3.8.1.7 ITS SR 3.8.1.2 & SR 3.8.1.7 CTS 4.9.A.2.a.1 states that each diesel shall be started and loaded for greater than 2 hours. ITS SR 3.8.1.2 requires starting the EDG and achieving rated voltage and frequency. This differs from the STS SR 3.8.1.2 which indicates, by brackets, that plant specific values for frequency and voltage should be provided. JFD 8 states that the specific values are already in plant procedures and will be added to the Bases for ITS SR 3.8.1.2 and SR 3.8.1.7.	Revise the submittal to include specific voltage and frequency values in SR 3.8.1.2, consistent with the STS and the current licensing basis.	
NPPD Response:					
7	L.5 L.9	2 9	CTS 4.9.A.2.a.1 STS SR 3.8.1.3 Notes 1 and 2 ITS SR 3.8.1.3 Notes 1 and 2 Note 1 to ITS SR 3.8.1.3, DG load test, differs from STS 3.8.1.3 Note 1 by stating that 'gradual loading is permitted consistent with the manufacturer's recommendations' instead of stating that 'gradual loading is permitted as recommended by the manufacturer.' Also, ITS Note 2 differs from STS Note 2 by replacing 'outside the load range' with 'below the required limit'	These are not justifiable plant-specific or editorial differences. Revise the submittal to adopt STS SR 3.8.1.3 Notes 1 and 2. See comment 3.8.1-05.	
NPPD Response:					

3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
8	M.12	8	CTS 4.9.A.2.b STS SR 3.8.1.19 ITS SR 3.8.1.11 CTS 4.9.A.2.b requires demonstrating that the diesel will start and accept the emergency load within the specified time sequence but does not specify voltage and frequency requirements. ITS SR 3.8.1.11 c.2 and c.3 specify that rated voltage and frequency must be achieved. This differs from STS SR 3.8.1.19 which indicates, by brackets, that plant specific values for frequency and voltage should be provided. JFD 8 states that the specific values are in plant procedures and are added to the Bases.	Revise the submittal to include specific voltage and frequency values in SR 3.8.1.11, consistent with the STS and the current licensing basis.	
NPPD Response:					
9	M.12	6	CTS 4.9.A.2.b STS SR 3.8.1.19 ITS SR 3.8.1.11 CTS 4.9.A.2.b requires demonstrating that the diesel will start and accept the emergency load within the specified time sequence but does not specify how long the EDG must supply the loads during the test. ITS SR 3.8.1.11 c.4 specifies that the EDG must supply only the auto-connected emergency load for ≥ 5 minutes. This differs from STS SR 3.8.1.19 which requires that the EDG supply both the permanently connected and auto-connected emergency loads for ≥ 5 minutes. No justification is provided for omitting permanently connected emergency loads from the requirement.	Provide justification for this STS deviation based on current licensing basis, system design, or operational constraints.	
NPPD Response:					

3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
10	M.8	12	STS SR 3.8.1.14 ITS SR 3.8.1.9 ITS SR 3.8.1.9 is a new requirement to load test the DG for at least 8 hours where 2 of the hours are at 105% to 110% of the continuous rating and the remaining hours are at 90% to 100% of the continuous rating. ITS SR 3.8.1.9 differs from STS SR 3.8.1.14 which requires (1) a 24 hour test with 2 hours at a specified load range and the remaining hours at another specified load range; and (2) stating plant-specific load values in kW. JFD 12 bases the 8-hour test on IEEE Standard 387-1995, Section 7.5.9 and Table 3 for cyclic testing, noting that a 24-hour test is only recommended for preoperational testing. Staff does not agree with this justification. In addition, plant-specific load values in kW should be specified in the SR itself, not only in the Bases.	Revise the submittal to adopt STS SR 3.8.1.14 with a 24-hour load test and load value ranges specified in kW.	**Check with ET.**
NPPD Response:					
11	M.8	6	STS SR 3.8.1.18 ITS SR 3.8.1.10 ITS 3.8.1.10 is a new requirement to verify that the interval between each sequenced load is 'within specified limits' for the timed logic sequence. ITS SR 3.8.1.10 differs from corresponding STS SR 3.8.1.18 which specifies that the interval must be '± 10% of design interval'. The '± 10% of design interval' is a bracketed item where the plant specific value is to be entered. JFD 6 does not specifically discuss substituting "within specified limits" for a specific percentage limit.	Revise ITS SR 3.8.1.10 to include a plant-specific acceptance limit expressed as a percentage of the design interval.	
NPPD Response:					

3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
12		2	STS LCO 3.8.1 c STS 3.8.1 Action F ITS 3.8.1 STS LCO 3.8.1.c requires three automatic sequencers and STS 3.8.1 Action F applies to one automatic load sequencer inoperable (these are bracketed items). ITS 3.8.1 does not adopt these requirements for automatic sequencers. JFD 2 states that these bracketed items are not applicable to CNS, but does not explain why.	Revise JFD 2 to explicitly state how the reviewer's note for not adopting STS 3.8.1 Action F is satisfied. Otherwise, adopt STS LCO 3.8.1 c and Action F.	
NPPD Response:					
13		2	STS SRs 3.8.1.4, 3.8.1.5, and 3.8.1.6 ITS SRs 3.8.1.4, 3.8.1.5, and 3.8.1.6 STS SRs 3.8.1.4, 3.8.1.5, and 3.8.1.6 indicate that surveillances are to be performed on engine mounted tanks (this is a bracketed item). Requirements for engine mounted tanks are not adopted in corresponding ITS SRs 3.8.1.4, 3.8.1.5, and 3.8.1.6. JFD 2 contains no specific information to explain why these requirements are not applicable to CNS.	Revise the submittal to explicitly confirm whether or not CNS DGs have engine mounted tanks. If they do, adopt the STS requirements.	
NPPD Response:					

3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
14		10	STS SR 3.8.1.9 single-largest-load rejection by DG STS SR 3.8.1.10 full load rejection by DG STS SR 3.8.1.11 DG start on LOOP STS SR 3.8.1.12 DG start on ECCS initiation STS SR 3.8.1.13 automatic DG trip bypass test STS SR 3.8.1.15 DG hot-restart and load test STS SR 3.8.1.16 transfer of loads from DG to offsite circuit STS SR 3.8.1.17 automatic return of DG to standby mode from test mode upon an ECCS initiation signal STS SR 3.8.1.20 simultaneous start of both DGs ITS do not adopt the listed SRs because they do not "materially contribute to the demonstration of DG Operability." This conclusion is based on the following reasons: (a) test of non-credited design feature SR 3.8.1.9 SR 3.8.1.10 SR 3.8.1.13 SR 3.8.1.16 (b) other DG is adequate to mitigate DBA SR 3.8.1.9 (c) consequences of overspeed bounded by failure of DG itself SR 3.8.1.10 (d) operator action required regardless of overspeed, but not assumed for first 10 minutes after DBA SR 3.8.1.10 SR 3.8.1.16 continued	*Note: Comments are numbered the same as for the associated reason.* Comment for reasons (a), (b), (c), (d), (e), (h), (l), (k), (l), and (m).: This is likely true for most facilities; thus this reason is generic, not plant-specific. Except for SR 3.8.1.17, which tests a feature not in the Cooper deign, no plant-specific reasons are given for not adopting these surveillances. Revise the submittal to adopt these requirements. continued	

3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
14 contd.			(continued) (e) combined LOOP-LOCA test (ITS SR 3.8.1.10) bounds separate tests SR 3.8.1.11 SR 3.8.1.12 (f) not consistent with current test practices (CTS 4.9.A.1.a and 4.9.A.1.b). SR 3.8.1.11 SR 3.8.1.12 (g) not consistent with current test practices SR 3.8.1.15 SR 3.8.1.20 (h) Hot restart capability demonstrated during initial plant startup testing. SR 3.8.1.15 (i) Monthly start and load test adequately demonstrate ability to operate and start at normal operating temperatures - the DG is designed to start when "hot". SR 3.8.1.15 continued	(continued) (f) CTS specify separate LOOP and LOCA tests, apparently in conflict with 'current test practices.' (g) Adding these test requirements is not inconsistent with current testing practice, since they are not currently done. continued	

3.8.1	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
14 contd.			(continued) (j) Not consistent with current test practices SR 3.8.1.17 (k) DGs do not perform any safety-related function for a LOCA event (i.e., ECCS initiation), when offsite sources remain available. SR 3.8.1.17 (l) Current licensing basis does not require postulating that a LOOP occurs some time subsequent to when a LOCA occurs. SR 3.8.1.17 (m) Separation and Independence are part of the design and thus do not need to be verified by [periodic] testing; they are ensured by configuration control and existing maintenance practices SR 3.8.1.20	(continued) (j) It appears that automatic realignment to standby mode is not part of design, so it cannot be tested. Thus, this reason is plant-specific and acceptable.	
NPPD Response:					

3.8.2	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		3	STS 3.8.2 Action A Note ITS 3.8.2 Action A Note STS Action A Note states "....with one required division de-energized...." The corresponding note in the ITS states "....when any division is de-energized...." JFD 3 bases this difference on avoiding a possible misinterpretation that the note would not apply if more than one division is de-energized as a result of Condition A. This is not a plant specific basis.	This generic difference is consistent with the STS Bases for Action A and appears acceptable. NPPD is requested to propose a generic change to the STS as a condition of adopting this difference in the ITS.	
NPPD Response:					
2			ITS 3.8.2 Actions Note TSTF-36 ITS propose a note to the Actions that says LCO 3.0.3 is not applicable. This difference from the STS is based on TSTF-36. NRC rejected TSTF-36 and its first revision. The TSB reviewer has recommended rejection of Revision 2.	This note is unnecessary. Revise the submittal to omit this note. This Note should also be removed from ITS 3.8.5 and 3.8.8.	
NPPD Response:					
3		1	ITS SR 3.8.2.1 STS SR 3.8.2.1 The listed SRs of ITS 3.8.1 omit the SRs of STS 3.8.1 that CNS does not propose to adopt.	Make appropriate changes upon resolution of comment 3.8.1-14.	
NPPD Response:					

3.8.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1	A.2		CTS 4.9.A.2.d ITS SR 3.8.3.3 CTS 4.9.A.2.e ITS 5.5.9 Bases for ITS SR 3.8.3.3 DOC LA.3 for ITS Section 5.5 JFD 25 for ITS Section 5.5 Bases JFD 6 for ITS Section 3.8.3 TSTF-106 (approved) ITS 5.5.9, Diesel Fuel Oil Testing Program, and ITS SR 3.8.3.3, which requires verifying fuel oil properties in accordance with ITS 5.5.9, replace CTS 4.9.A.2.d and 4.9.A.2.e. ITS 5.5.9 establishes the diesel fuel oil tests the program must include But certain details, such as the surveillance test interval for new fuel oil parameters of density, kinematic viscosity, flash point, and appearance, are moved to the Bases for SR 3.8.3.3 and the Diesel Fuel Oil Testing Program itself, outside TS. As discussed in JFD 25 for ITS Section 5.5, ITS 5.5.9.a.3 (and associated Bases discussion of SR 3.8.3.3) allow an alternate test for verification of acceptability of new fuel (prior to addition to the storage tank) with regard to water and sediment content - the ASTM-D975-1989a water and sediment by centrifuge test - in lieu of the ASTM-D4176-1991 clear and bright test as specified by CTS 4.9.A.2.e.1.d.	Adding the centrifuge test for new fuel is a difference from the STS and a change to the CTS. Thus, it is a beyond-scope change. Ed Tomlinson or EELB must review it.	

NPPD Response:

3.8.3	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2		4	STS 3.8.3 Required Action E.1 ITS 3.8.3 Required Action E.1 STS Required Action E.1 requires restoring starting air receiver pressure to $\geq$ [225] psig. ITS 3.8.3 Required Action E.1 replaces $\geq$ [225] psig with "within limit." The justification is based on being consistent with the Required Actions of this specification. This is not a plant specific change but is a possible generic change that should be accomplished with a TSTF.	This is not a justifiable plant specific or editorial difference. Revise the submittal to adopt the STS wording.	
NPPD Response:					
3		6	STS 3.8.3 Action E STS SR 3.8.3.4 ITS 3.8.3 Action E ITS SR 3.8.3.4 STS 3.8.3 Action E and SR 3.8.3.4 state "... starting air receiver..." ITS 3.8.3 Action E and SR 3.8.3.4 revises this statement to ".... required starting air receiver..." The justification states that the changes reflect plant specific design and analysis but does not provide any details about actual specific design or analysis.	Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	
NPPD Response:					

3.8.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		1	a. Bases discussion of ITS LCO 3.8.4 Bases discussion of ITS 3.8.4 Applicability The ITS Bases replaces the STS words 'anticipated operational occurrence (AOO)' with 'abnormal operational transient.' Note this is a **global** difference and should be addressed throughout the ITS Bases.	a. This is not a justifiable plant-specific or editorial difference. Revise the submittal to adopt the STS wording. b. Revise all Bases to reflect this STS preference.	
		4	b. Bases discussion of Applicable Safety Analysis for ITS 3.8.4 - last sentence This is a **global** comment - the last sentence should cite the regulation 10 CFR 50.36(c)(2)(ii) directly, not by referring to Reference 5.	c. Adopt the STS word since 'specified' doesn't add any clarity and could be confusing in the technical *specifications*. Note, this comment should be applied globally to all of the Bases.	
		3	c. Bases discussion of ITS 3.8.4 Required Actions B.1 and B.2 The ITS Bases uses the word 'specified' in place of the STS word 'required' regarding the time to reach Mode 4 allowed by RG 1.93.		
			d. Bases discussion of ITS SR 3.8.4.1 The ITS omits the STS words "(or a battery cell)."	d. This is not a justifiable plant-specific or editorial difference. Revise the Bases to adopt the omitted words.	
		3	e. Bases for ITS SR 3.8.4.8, 3rd paragraph The ITS Bases replace STS's "battery rate of deterioration is increasing" with "battery is getting old and capacity will decrease more rapidly."	e. This is not a justifiable plant-specific or editorial difference. Revise the submittal to adopt the STS wording.	

NPPD Response:

3.8.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
2	L.6		CTS 4.9.A.3.d.3 ITS SR 3.8.4.8 DOC L.6 does not address omitting from SR 3.8.4.8 the 17-year in-service criteria for requiring a battery discharge test.	Revise the submittal with a justification for this omission.	
NPPD Response:					
3		2	STS 3.8.4 Action C ITS 3.8.4 Actions STS 3.8.4, required actions for DG DC subsystem, is omitted from ITS 3.8.4. JFD 2 states these action requirements are not applicable to the CNS design, but fails to offer details explaining why it is not applicable to the CNS design.	Provide justification for this STS deviation which describes details of CNS design differences.	
NPPD Response:					

3.8.4	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4	L.1	3	CTS 3.9.B.3.a ITS 3.8.4 Action A CTS 3.9.B.3.b STS 3.8.4 Action A ITS 3.8.4 Action C CTS 3.9.B.3.a and CTS 3.9.B.3.b provide Actions, including restoring the inoperable battery within **2 hours** or the inoperable battery charger within **4 hours** when one 125 V DC or 250 V DC battery or battery charger is inoperable. ITS 3.8.4 Action A is applicable to only the 125 V DC batteries and associated chargers (subsystems) and ITS 3.8.4 Action C, not contained in STS 3.8.4, is separately specified for the 250 V DC subsystems. Action C requires declaring the associated supported features inoperable immediately. According to the Bases for ITS 3.8.4 Action C: a. An inoperable 250 V DC subsystem renders the RCIC system and the Division 1 LPCI subsystem inoperable. The applicable action requirements, Action A of ITS 3.5.1 and Action A of ITS 3.5.3 allow **7 days** and **14 days**, respectively, to restore the RCIC and LPCI subsystems. b. An inoperable 250 V DC subsystem renders the HPCI system and the Division 2 LPCI subsystem inoperable. Corresponding Action E of ITS 3.5.1 allow **3 days** to restore the HPCI and LPCI subsystems. Increasing the Completion Times from 2 or 4 hours to the times given in ITS Section 3.5 is a significant change and is beyond the scope of the conversion	This item is referred to the PM for tech staff review.	
NPPD Response:					

3.8.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		4	STS 3.8.5 SR 3.8.5.1 ITS 3.8.5 SR 3.8.5.1 STS SR 3.8.5.1 states "For DC sources required to be OPERABLE,:....." ITS SR 3.8.5.1 replaces sources with electrical power subsystems and states "For DC electrical power subsystems required to be OPERABLE, ... " The justification is based on being consistent with the wording of the LCO and ACTION. This is not a plant specific change but is a possible generic change to the STS that should be accomplished using the STS generic change process.	Revise the submittal to conform to the STS wording.	
NPPD Response:					
2		5	STS SR 3.8.5.1 ITS SR 3.8.5.1 STS SR 3.8.5.1 lists the SRs to be performed in a column format. ITS SR 3.8.5.1 lists the same SRs in a sentence format. The justification is based on being consistent with the Writers Guide. This is not a plant specific change but is a possible generic change to the STS that should be accomplished using the STS generic change process.	Revise the submittal to conform to the STS wording.	
NPPD Response:					

3.8.5	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3			ITS 3.8.5 Actions Note and associated Bases discussion TSTF-36 ITS 3.8.5 adds a note to the Actions of STS 3.8.5 stating LCO 3.0.3 is not applicable." The justification is based on information in TSTF-36. The disposition of TSTF-36 R.1 and R.2 is "Pending."	This note is not necessary. Explain how there could be an "inability to suspend movement of irradiated fuel assemblies" for up to 6 hours." Withdraw it from the submittal.	
NPPD Response:					

3.8.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1			CTS Table 3.9-1 footnote (5) ITS Table 3.8.6.1 footnote (b) CTS Table 3.9-1 footnote (5) requires correcting specific gravity for electrolyte temperature and level. ITS Table 3.8.6.1 footnote (b) has the same requirement but also states that level correction is not required when on float charge and battery charging current is < 2 amps. No discussion or justification is provided for this change to the CTS.	Provide discussion and justification for the CTS change stating that level correction is not required when on float charge and battery charging current is < 2 amps.	
NPPD Response:					
2		3	STS 3.8.6 Condition B STS Table 3.8.6.1 Category C ITS 3.8.6 Condition B STS Table 3.8.6.1 Category C a. The third Condition of STS Condition B states "...parameters not within Category C values." ITS 3.8.6 Condition B replaces the word "values" with "limits". The justification is to more closely match the LCO description. b. The STS Table 3.8.6.1 Category C column is entitled "Category C: Allowable Limits for Each Connected Cell." ITS Table 3.8.6.1 deletes the word "Allowable." The justification is to be consistent with manner in which Category C "Limits" are described in the Actions and that is will avoid confusion with the term "Allowable Value" used in the Instrumentation section. These are not plant specific changes but are possible generic changes that should be accomplished using the STS generic change process.	These are not plant specific differences. Revise the submittal to adopt the STS wording. NPPD is encouraged to initiate a generic change proposal to the TSTF.	
NPPD Response:					

3.8.6	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3		2	ITS LCO 3.8.6 ITS SR 3.8.6.3 Unlike the STS, the ITS specifically requires electrolyte temperature to be within limits (given in SR 3.8.6.3) because ITS Table 3.8.6-1 does not specify electrolyte temperature limits. This is a generic difference from the STS.	This difference is acceptable; thus the STS should be corrected. NPPD is encouraged to initiate a generic change proposal to the TSTF.	
NPPD Response:					

3.8.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		4	STS LCO 3.8.9 STS SR 3.8.9.1 STS 3.8.9 Action B ITS LCO 3.8.7 STS 3.8.9 Action E ITS 3.8.7 Actions ITS Bases Table B 3.8.7-1 The STS LCO 3.8.9 and SR 3.8.9.1 include the AC vital bus and Action B contains Conditions and Required Actions for the AC vital bus. These are not included in corresponding ITS 3.8.7. In addition ITS 3.8.7 does not include STS Action E for the DG DC electrical power distribution system. The justification for these STS changes is that the bracketed items are not applicable to CNS. This implies that CNS does not have a vital AC bus or a DG DC electrical power distribution system. However this is not specifically stated in either the justification for the deviation or in the Bases discussion.	Revise the submittal to explicitly confirm whether or not CNS has AC vital buses or a DG DC electrical power distribution system. In addition, the smooth version of the Bases table is incorrectly labeled B 3.8.9-1; it should be B 3.8.7-1.	
NPPD Response:					
2		1	STS 3.8.7 and 3.8.8 STS 3.8.7 and STS 3.8.8 contain requirements for inverters when operating and when shutdown, respectively. The ITS does not implement these requirements. The justification states that these STS sections are deleted because they are not applicable to CNS. Although not explicitly stated in either the justification or the Bases, this implies that CNS does not have inverters. In addition there is no discussion of how the function of supplying AC power that is derived from DC (such as by using inverters or MG sets) is provided.	Revise the submittal to explicitly confirm whether or not CNS has inverters or comparable equipment, such as MG sets.	
NPPD Response:					

3.8.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
3	A.4	5	CTS 3.9.A.1.d CTS 3.9.B.3.a CTS 3.9.B.3.b STS 3.8.9 ITS 3.8.7 Action D ITS 3.8.7 Action D is included to require that supported subsystems (including LPCI, RCIC, and HPCI subsystems) be declared inoperable immediately upon discovery that a 250 V DC distribution subsystem is inoperable. As discussed in Comment 3.8.4-4, in terms of when a shutdown is required, this changes relaxes this time from 2 or 4 hours to 3 or 7 days, depending upon the division that is inoperable. This is a significant change and is beyond the scope of the conversion.	This item is referred to the PM for tech staff review.	
NPPD Response:					

3.8.7	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
4		5	ITS LCO 3.8.7 ITS 3.8.7 Actions ITS Bases Table 3.8.7-1 Bases discussion of ITS LCO 3.8.7, STS markup Insert 1 The Bases for the simplified Actions table in STS 3.8.9 is that all safety related electrical busses, motor control centers, panels, etc. would be listed in the Bases table, relieving the operator from declaring inoperable numerous components supplied by one of these busses or panels. For simplicity, a common time of 8 hours was established for AC distribution subsystems and 2 hours for DC distribution subsystems, and 2 hours for Vital AC subsystems - regardless of the importance of the systems supported by these distribution subsystems. By not listing in the Bases table all panels supplying safety-related loads, the ITS conflicts with the rational behind the STS Actions table. NPPD proposes to mix cascading, no-cascading, and Action-directed cascading in the ITS 3.8.7 Actions table. The STS tries to avoid such an arrangement. The CTS requirements for distribution systems are only covered by the definition of operability - which implies that anytime a panel or bus is discovered inoperable, all supported loads should be declared inoperable and appropriate TS action requirements should be met. I.e., complete cascading. The STS approach - no cascading - was concluded to be an improvement. The 250 V DC busses may be a special case because of the relatively few safety related subsystems they support. Thus, ITS Action D, which directs cascading to the ECCS and RCIC specifications, may be an acceptable difference from the STS. Its acceptance is open pending resolution of Comments 3.8.4-4 and 3.8.7-3.	Revise the submittal to conform to the STS presentation of requirements - a complete list of electrical busses and panels in the Bases table. Note that the ITS for Hatch 1 and 2 were approved with no Bases table, but with a fairly comprehensive listing of electrical busses and panels in the LCO itself. See the Hatch SE page 278. Such a presentation may be acceptable for CNS.	

NPPD Response:

3.8.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		2	STS LCO 3.8.10 STS 3.8.10 Condition A and Required Action A.2.4 STS SR 3.8.10.1 ITS LCO 3.8.8 ITS 3.8.8 Condition A and Required Action A.2.4 ITS SR 3.8.10.1 The STS 3.8.10 LCO, Condition A, Required Action A.2.4 and SR 3.8.10.1 includes requirements, Conditions, and Required Actions for the AC vital bus. These are not included in the corresponding ITS 3.8.8. The justification for these STS changes is that the plant specific value/nomenclature has been provided for the bracketed items. This implies that CNS does not have a vital AC bus. However this is not specifically stated in either the justification for the deviation or in the Bases discussion.	Revise the submittal to explicitly confirm whether or not CNS has AC vital buses. See Comment 3.8.7-1.	
NPPD Response:					
2			STS 3 0 ACTIONS ITS 3.8 TIONS ITS 3.8.8 contains note to the ACTIONS not found in STS 3.8.10 stating " LCO 3.0.3 is not applicable." The justification is based on information in TSTF-36.	See Comments 3.8.2-2 and 3.8.5-3.	
NPPD Response:					

3.8.8	DOC	JFD	CHANGE/DIFFERENCE	COMMENT	STATUS
1		2	STS LCO 3.8.10 STS 3.8.10 Condition A and Required Action A.2.4 STS SR 3.8.10.1 ITS LCO 3.8.8 ITS 3.8.8 Condition A and Required Action A.2.4 ITS SR 3.8.10.1 The STS 3.8.10 LCO, Condition A, Required Action A.2.4 and SR 3.8.10.1 includes requirements, Conditions, and Required Actions for the AC vital bus. These are not included in the corresponding ITS 3.8.8. The justification for these STS changes is that the plant specific value/nomenclature has been provided for the bracketed items. This implies that CNS does not have a vital AC bus. However this is not specifically stated in either the justification for the deviation or in the Bases discussion.	Revise the submittal to explicitly confirm whether or not CNS has AC vital buses. See Comment 3.8.7-1.	
NPPD Response:					
2			STS 3.8.10 ACTIONS ITS 3.8.8 ACTIONS ITS 3.8.8 contains a note to the ACTIONS not found in STS 3.8.10 stating " LCO 3.0.3 is not applicable." The justification is based on information in TSTF-36.	See Comments 3.8.2-2 and 3.8.5-3.	
NPPD Response:					