

Richard A. Muench Vice President Engineering

MAR 5 1999

ET 99-0010

U. S. Nuclea: Regulatory Commission ATTN: Document Control Desk Mail Station P1-137 Washington, D. C. 20555

Reference:

- 1) Letter ET 97-0050. deted May 15, 1997, from R. A. Muench, WCNOC, to USNRC
- 2) Letter ET 98-00049, dated June 30, 1998, from R. A. Muench, WCNOC, to USNRC
- 3) Letter WO 98-0078, dated August 5, 1998, from C. C. Warren, WCNOC, to USNRC
- 4) Letter ET 98-0071, dated August 28, 1998, from R. A. Muench, WCNOC to USNRC
- 5) Letter ET 98-0078, dated September 24, 1998, from R. A. Muench, WCNOC, to USNRC
- 6) Letter ET 98-0085, dated October 16, 1998, from R. A. Muench, WCNOC, to USNRC
- 7) Letter ET 98-0087, dated October 23, 1998, from R. A. Muench, WCNOC, to USNRC
- 8) Letter WO 98-0105, dated November 24, 1998, from C. C. Warren, WCNOC, to USNRC
- 9) Letter ET 98-0098, dated December 2, 1998, from R. A. Muench, WCNOC, to USNRC
- 10) Letter ET 98-0102, dated December 17, 1998 from R. A. Muench, WCNOC to USNRC
- 11) Letter ET 98-0107, dated December 21, 1998, from R. A. Muench, WCNOC, to USNRC
- 12) Letter ET 99-0004, dated February 4, 1999, from R. A. Muench, WCNOC, to USNRC

Subject:

Docket No. 50-482: Follow-up Items Related to the Proposed Conversion to the Improved Technical Specifications Section 1.0, 3.1, 3.2, 3.3, 3.4, 3.6, 3.7, 3.8, 3.9, 4.0 and 5.0

Gentlemen:

Wolf Creek Nuclear Operating Corporation (WCNOC) requested an amendment to the Wolf Creek Generating Station (WCGS) Unit 1 facility operating license (NPF-42) by incorporating changes to the WCGS Technical Specification; (TS) as provided in Reference 1. The NRC staff requested additional information regarding Section 3.6, "Containment Systems," which was provided in Reference 2. The NRC staff requested additional information regarding Section 3.1, "Reactivity Control Systems," Section 3.2, "Power Distribution Systems," Section 3.5, "Emergency Core Cooling Systems," Section 3.9, "Refueling Operations," and 4.0, "Design Features," which was provided in Reference 3. The NRC staff requested additional information regarding Section 1.0, "Use and Application," Section 2.0, "Safety Limits," and Section 3.0, "Limiting Conditions for Operation Applicability/Surveillance Requirement Applicability" which was provided in Reference 4. The NRC staff requested additional information regarding Section 3.4, "Reactor Coolant System," and Section 5.0, "Administrative Controls," which was provided in Reference 5. The NRC staff

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Pool

9903160209 990305 PDR ADOCK 05000482 requested additional information regarding Section 3.7, "Plant Systems," which was provided in Reference 6. The NRC staff requested additional information regarding Section 3.3, "Instrumentation," which was provided in Reference 9. The NRC staff requested additional information regarding Section 3.8, "Electrica" power Systems," which was provided in Reference 10.

The Attachments to this letter provide (1) additional information or supporting documentation not provided in the original Request for Additional Information response, (2) answers to follow-up questions, or (3) additional changes identified by the licensee. Reference 7 provided the first follow-up letter, affecting ITS Sections 3.1, 3.2, 3.4, 3.5, and 5.0. Reference 8 provided the second follow-up letter, affecting ITS Sections 1.0, 3.4, 3.5, and 3.6. Reference 11 provided the third follow-up letter, affecting ITS Sections 1.0, 3.1, 3.2, 3.3, 3.4, 3.7, 3.9, and 5.0. Reference 12 provided the fourth follow-up letter, affecting ITS Sections 1.0, 3.2, 3.3, 3.4, 3.7, 3.9, and 5.0. Reference 12 provided the fourth follow-up letter, affecting ITS Sections 1.0, 3.2, 3.3, 3.4, 3.0, 3.7, 3.8, 3.9 and 5.0.

This letter and Enclosure are not a supplement to Reference 1 and have not been reviewed by the Plant Safety Review Committee or Nuclear Safety Review Committee. A supplement to Reference 1 is provided current with this letter.

If you have any questions concerning this response, please contact me at (316) 364-4034, or Mr. Michael J. Angus, 316-354-4077.

Very truly yours,

Richard A. Muench

Attachments Enclosure

RAM/rlr

cc: W. D. Johnson(NRC), w/a
E. W. Merschoff (NRC), w/a
Canior Resident Inspector (NRC), w/a
K. M. Thomas (NRC), w/a

STATE OF KANSAS)

COUNTY OF COFFEY)

Richard A. Muench, of lawful age, being first duly sworn upon oath says that he is Vice President Engineering of Wolf Creek Nuclear Operating Corporation; that he has read the foregoing document and knows the content thereof; that he has executed that same for and on behalf of said Corporation with full power and authority to do so; and that the facts therein stated are true and correct to the best of his knowledge, information and belief.

Richard & Muench

Vice President Engineering

SUBSCRIBED and sworn to before me this 5th day of March, 1999.

Phonda & C

Notary Public

Expiration Date 5-11-2002

The item numbers are formatted as follows: [Source] [ITS Section]-[nnn]

Source =

Q - NRC Question

NR - NRC Follow-up Question

CA - AmerenUE DC - PG&E WC - WCNOC CP - TU Electric

TR - Traveler

ITS	Item Number	Applicability	Enclosed
1.0	Q 1.1-1 TSTF-205	WG	YES
3.1	WC 3.1-001 (new)	WC	YES
3.2	WC 3.2-002 (new)	WC	YES
3.3	Q 3-LS-GEN	WC	YES
3.3	Q 2-02 (3.3)	CA, WC	YES
3.3	Q 2-18	CA, WC	YES
3.3	Q 2-37	WC	YES
3.3	Q 3-01	WC	YES
3.3	Q 7-13	CA, WC	YES
3.3	Q 3.3-04	CA	NA
3.3	Q 3.3-21	CA, WC	YES
3.3	Q 3.3-30	WC	YES
3.3	Q 3.3-32	CA, WC	YES
3.3	Q 3.3-34	CA, WC, DC	YES
3.3	Q 3.3-55	CA, WC	YES
3.3	Q 3.3-80	CA, WC	YES
3.3	Q 3.3-99	CA, WC	YES
3.3	Q 3 3-135	CA, WC	YES
3.3	CA 3.3-024 (new)	CA	NA
3.3	CA 3.3-025 (new)	CA	NA
3.3	TR 3.3-007	DC	NA
3.3	WC 3.3-020 (new)	WC	YES
3.3	WC 3.3-021 (new)	WC	YES
3.3	WC 3.3-022 (new)	WC, CA	YES
3.3	WC 3.3-023 (new)	WC	YES
3.3	WC 3.3-024 (new)	WC	YES
3.4	Q 3.4.11-2, TSTF-288	CA, DC, WC	YES
3.4	Q 3.4.11-3, TSTF-113	CA, WC	YES
3.4	WC 3.4-011	WC	YES

3.6 Q 3.6.3-1 3.6 Q 3.6.3-1 3.6 Q 3.6.3-1 3.6 Q 3.6.3-1 3.6 Q 3.6.3-2 3.6 Q 3.6.3-2 3.6 Q 3.6.3-3 3.6 Q 3.6.3-3 3.7 Q 3.7.16-3 3.7 Q 3.7.17 3.7 CA 3.7-0 3.7 CA 3.7-0 3.7 CA 3.7-0 3.7 WC 3.7-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3	00010		
3.6 Q 3.6.3-4 3.6 Q 3.6.3-1 3.6 Q 3.6.3-1 3.6 Q 3.6.3-2 3.6 Q 3.6.3-2 3.6 Q 3.6.3-3 3.6 Q 3.6.6-8 3.7 Q 3.7.16-3 3.7 Q 3.7.17 3.7 CA 3.7-0 3.7 CA 3.7-0 3.7 WC 3.7-0 3.7 WC 3.7-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.1-3 3.8 Q 3.8.1-3 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.1-2 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.1-3 3.8 Q 3.8.1-3 3.8 Q 3.8.1-1	Q 3.6.1-6	DC, CA	NA
3.6 Q 3.6.3-1 3.6 Q 3.6.3-1 3.6 Q 3.6.3-2 3.6 Q 3.6.3-3 3.6 Q 3.6.6-8 3.7 Q 3.7.16-3.7 3.7 CA 3.7-0 3.7 CA 3.7-0 3.7 CA 3.7-0 3.7 WC 3.7-0 3.7 WC 3.7-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1		WC	YES
3.6 Q 3.6.3-1 3.6 Q 3.6.3-1 3.6 Q 3.6.3-2 3.6 Q 3.6.3-3 3.6 Q 3.6.6-8 3.7 Q 3.7.16-3 3.7 Q 3.7.17 3.7 CA 5.7-00 3.7 CA 3.7-0 3.7 WC 3.7-0 3.7 WC 3.7-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.1-3 3.8 Q 3.8.1-1		CA	NA
3.6 Q 3.6.3-1 3.6 Q 3.6.3-2 3.6 Q 3.6.3-3 3.6 Q 3.6.6-8 3.7 Q 3.7.16-3.7 Q 3.7.17. 3.7 CA 3.7-0 3.7 CA 3.7-0 3.7 WC 3.7-0 3.7 WC 3.7-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.1-3 3.8 Q 3.8.1-1		CA	NA
3.6 Q 3.6.3-2 3.6 Q 3.6.3-3 3.6 Q 3.6.3-3 3.6 Q 3.6.6-8 3.7 Q 3.7.16-3 3.7 Q 3.7.17 3.7 CA 5.7-00 3.7 CA 3.7-0 3.7 WC 3.7-0 3.7 WC 3.7-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.1-3 3.8 Q 3.8.1-3 3.8 Q 3.8.1-1		WC	YES
3.6 Q 3.6.3-3 3.6 Q 3.6.6-8 3.7 Q 3.7.16- 3.7 Q 3.7.17. 3.7 CA 5.7-00 3.7 CA 3.7-01 3.7 WC 3.7-0 3.7 WC 3.7-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.1-1		CA	CA
3.6 Q 3.6.6-8 3.7 Q 3.7.16- 3.7 Q 3.7.17. 3.7 CA 5.7-00 3.7 CA 3.7-01 3.7 WC 3.7-01 3.7 WC 3.7-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.1-1		CA, WC	YES
3.7 Q 3.7.16- 3.7 Q 3.7.17. 3.7 CA 5.7-00 3.7 CA 3.7-01 3.7 WC 3.7-0 3.7 WC 3.7-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3	Q 3.6.3-33	CA	NA
3.7 Q 3.7.17. 3.7 CA 5.7-00 3.7 CA 3.7-01 3.7 CA 3.7-01 3.7 WC 3.7-0 3.7 WC 3.7-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.1-3 3.8 Q 3.8.1-1	Q 3.6.6-8	DC	NA
3.7 CA 5.7-00 3.7 CA 3.7-01 3.7 CA 3.7-01 3.7 WC 3.7-0 3.7 WC 3.7-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.1-1	Q 3.7.16-3	CA, WC	YES
3.7	Q 3.7.17.1-6	CA, WC	YES
3.7 CA 3.7-01 3.7 CA 3.7-01 3.7 WC 3.7-0 3.7 WC 3.7-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.1-1	CA 3.7-005	CA	NA
3.7	CA 3.7-010 (new)	CA	NA
3.7 WC 3.7-0 3.7 WC 3.7-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.2-0 3.8 Q 3.8.2-0 3.8 Q 3.8.4-1 3.8 Q 3.8.8-0	CA 3.7-011 (new)	CA	NA
3.7 WC 3.7-1 3.8 Q 3.8.1-0 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.2-0 3.8 Q 3.8.2-0 3.8 Q 3.8.4-1 3.8 Q 3.8.8-0	WC 3.7-009 (new)	WC	YES
3.8 Q 3.8.1-1; 3.8 Q 3.8.1-1; 3.8 Q 3.8.1-1; 3.8 Q 3.8.1-2; 3.8 Q 3.8.1-2; 3.8 Q 3.8.1-2; 3.8 Q 3.8.1-3; 3.8 Q 3.8.2-0; 3.8 Q 3.8.2-0; 3.8 Q 3.8.4-1; 3.8 Q 3.8.8-0;	WC 3.7-101 (new)	WC	YES
3.8 Q 3.8.1-1; 3.8 Q 3.8.1-1; 3.8 Q 3.8.1-1; 3.8 Q 3.8.1-2; 3.8 Q 3.8.1-2; 3.8 Q 3.8.1-2; 3.8 Q 3.8.1-3; 3.8 Q 3.8.2-0; 3.8 Q 3.8.2-0; 3.8 Q 3.8.4-1; 3.8 Q 3.8.8-0;	Q 3.8.1-09CW	CA	NA
3.8 Q 3.8.1-1; 3.8 Q 3.8.1-1; 3.8 Q 3.8.1-2; 3.8 Q 3.8.1-2; 3.8 Q 3.8.1-2; 3.8 Q 3.8.1-2; 3.8 Q 3.8.2-0; 3.8 Q 3.8.2-0; 3.8 Q 3.8.4-1; 3.8 Q 3.8.4-2; 3.8 Q 3.8.8-0;	Q 3.8.1-12DC	DC	NA
3.8 Q 3.8.1-1 3.8 Q 3.8.1-2 3.8 Q 3.8.1-2 3.8 Q 3.8.1-2 3.8 Q 3.8.2-0 3.8 Q 3.8.2-0 3.8 Q 3.8.3-0 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-2 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0	Q 3.8.1-12WC	WC	YES
3.8 Q 3.8.1-2 3.8 Q 3.8.1-2 3.8 Q 3.8.1-2 3.8 Q 3.8.2-0 3.8 Q 3.8.2-0 3.8 Q 3.8.3-0 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-2 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0	Q 3.8.1-15WC	WC	YES
3.8 Q 3.8.1-2 3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.2-0 3.8 Q 3.8.3-0 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-2 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0	Q 3.8.1-18DC	DC	NA
3.8 Q 3.8.1-2 3.8 Q 3.8.1-3 3.8 Q 3.8.2-0 3.8 Q 3.8.3-0 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-2 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0	Q 3.8.1-27DC	DC	NA
3.8 Q 3.8.1-3 3.8 Q 3.8.2-0 3.8 Q 3.8.3-0 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-2 3.8 Q 3.8.8-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0	Q 3.8.1-29DC	DC	NA
3.8 Q 3.8.2-0 3.8 Q 3.8.3-0 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-2 3.8 Q 3.8.8-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0	Q 3.8.1-33DC	DC	NA
3.8 Q 3.8.4-0 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-2 3.8 Q 3.8.8-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0	Q 3.8.2-04CW	CA	NA
3.8 Q 3.8.4-0 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-2 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0	Q 3.8.3-06DC	DC	NA
3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-1 3.8 Q 3.8.4-2 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0	THE RESERVE OF THE PROPERTY OF	ViC	YES
3.8 Q 3.8.4-1 3.8 Q 3.8.4-2 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0 3.8 Q 3.8.8-0		ic.	NA
3.8 Q 3.8.4-1 3.8 Q 3.8.4-2 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0	Q 3.8.4-17	WC	YES
3.8 Q 3.8.4-2 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0	Q 3.8.4-18	CA	NA
3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0	Q 3.8.4-29	WC	YES
3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0	Q 3.8.B-01.a	CA	NA
3.8 Q 3.8.B-0 3.8 Q 3.8.B-0 3.8 Q 3.8.B-0	Q 3.8.B-01.g	CA	NA
3.8 Q 3.8.B-0 3.8 Q 3.8.B-0	Q 3.8.B-01j	CA	NA
3.8 Q 3.8.B-0	Q 3.8.B-01p	CA	NA
	Q 3.8.B-04.r	WC	YES
	CA 3.8-003 (new)	CA	NA NA
THE RESIDENCE OF THE PERSON OF	DC 3.8-ED	DC	NA
e de transcer de mancada de la reconstanción de la reconstanción de la reconstanción de la reconstanción de la	WC 3.8-007 (new)	WC, CA	YES

Attachment 1 to ET 99-0010 Page 3 of 3

3.9	WC 3.9-007 (new)	WC, CA, DC	YES
4.0	WC 4.0-ED (new)	WC	YES
5.0	Q 5.2-1	CA	NA
5.0	WC 5.0-007 (new)	WC	YES

ADDITIONAL INFORMATION COVER SHEET

ADDITIONAL INFORMATION NO: Q 1.1-1 APPLICABILITY: WC

REQUEST: CTS 1.3, Analog Channel Operations Test

CTS 1.3, Channel Operational Test [Diablo Canyon] CTS 1.7, Channel Functional Test [Diablo Canyon]

CTS 1.35, Trip Actuating Device Operational Test [Wolf Creek] CTS 1.36, Trip Actuating Device Operational Test [Callaway]

CTS 1.37, Trip Actuating Device Operational Test [Comanche Peak] CTS 1.38, Trip Actuating Device Operational Test [Diablo Canyon]

DOC 1-30-A

ITS 1.1, Channel Operational Test (COT)

ITS 1.1, Channel Functional Test (CFT) [Diablo Canyon]

ITS 1.1, Trip Actuating Device Operational Test (TADOT)

JFD 1.1-9

These are changes to both the CTS and the STS and are considered generic. Therefore, they are beyond the scope of the conversion review. The DOC states that these changes are consistent with TSTF-39, Rev. 1. Also, Diablo Canyon's ITS markup appears to be in error as shown by "Channel Operational" versus "Channel Operational Test (COT)."

Comment: If NRC has not approved TSTF-39 by the time the draft safety evaluation is prepared, then these changes should be withdrawn from the conversion submittal at that time. These changes will not be reviewed on a plant-specific basis. In addition, correct the Diablo Canyon ITS markup for COT.

FLOG RESPONSE: (original) TSTF-39 Rev. 1 has been withdrawn by the TSTF. However, changes addressed in TSTF-39 Rev. 1 have been subsumed by TSTF-205. Revision 1 of TSTF-205 is currently undergoing final review by the TSTF members. After final wording changes for the COT definition as well as Section 3.3 Bases changes to establish the requirements for relay contact surveillance testing (issue originally raised at Peach Bottom) are agreed upon, Revision 1 will be submitted for NRC review. The attached pages represent the definition changes to be included in Revision 1. The Section 3.3 Bases changes will be addressed under that Section's review.

FLOG RESPONSE: (supplement) The FLOG proposes to incorporate Revision 3 of TSTF-205 which has been approved by NRC. The only changes required involve the definitions of MASTER RELAY TEST and SLAVE RELAY TEST. ITS Section 3.3 Bases changes to relax the requirements for relay contact surveillance testing, which per the traveler may be performed during COTs and TADOTs by the verification of the change of state of a single contact of the relay, have not been incorporated.

FLOG RESPONSE: (supplement) During final safety committee reviews, it was identified that the Wolf Creek revision did not accurately reflect TSTF-205, Rev. 3. The changes to the attached pages are consistent with TSTF-205, Rev. 3.

ATTACHED PAGES:

Attachment No. 4, CTS 1.0 - ITS 1.0

Encl. 2 1-1 Encl. 5A 1.1-1, 1.1-2, 1.1-6