**CHARLES H. CRUSE**
Vice President
Nuclear Energy

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
1650 Calvert Cliffs Parkway
Lusby, Maryland 206[illegible]7
410 495-4455

BGE

September 10, 1997

U. S. Nuclear Regulatory Commission
Washington, DC 20555

ATTENTION: Document Control Desk

SUBJECT: Calvert Cliffs Nuclear Power Plant
Unit Nos. 1 & 2; Docket Nos. 50-317 & 50-318
Revision 5 to the License Amendment Request to Convert to the Improved Technical Specifications (TAC Nos. M97363 and M97364)

**REFERENCE:** (a) Letter from A. W. Dromerick (NRC) to C. H. Cruse (BGE), dated May 29, 1997, Request for Additional Information Regarding the Technical Specification Change Request to Convert to the Improved Technical Specifications (TAC Nos. M97363 and M97364)

The referenced letter transmitted questions regarding Section 3.4 of Baltimore Gas and Electric Company's application to convert to the Improved Standard Technical Specifications.

The responses for Section 3.4 are provided in Attachment 1 of this letter. Also attached to this letter is Revision 5 to the original license amendment application. These changes result from the responses provided in Attachment 1, as well as other changes identified by plant personnel. Changes to the No Significant Hazards Considerations discussions are included where appropriate.

To assist in reviewing this revision, a table describing each of the changes is provided (Attachment 2). All of the material for each change is grouped by change in Attachment (3). Attachment (4) provides the revision by Improved Technical Specification Section for ease of replacing pages in the original amendment request. Page replacement instructions are provided. All changes are marked with revision bars and are labeled Revision 5.

The Plant Operations and Safety Review Committee and a subcommittee of the Offsite Safety Review Committee have reviewed revisions resulting in changes to the No Significant Hazards Considerations and concur that operation with the proposed revisions will not result in an undue risk to the health and safety of the public.



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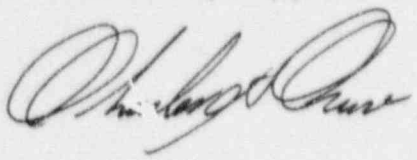
NRC

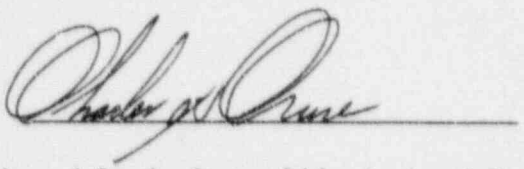
Should you have questions regarding this matter, we will be pleased to discuss them with you.

Very truly yours,



**STATE OF MARYLAND** :
: **TO WIT:**
**COUNTY OF CALVERT** :

I, Charles H. Cruse, being duly sworn, state that I am Vice President, Nuclear Energy Division, Baltimore Gas and Electric Company (BGE), and that I am duly authorized to execute and file this License Amendment Request on behalf of BGE. To the best of my knowledge and belief, the statements contained in this document are true and correct. To the extent that these statements are not based on my personal knowledge, they are based upon information provided by other BGE employees and/or consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.



Subscribed and sworn before me, a Notary Public in and for the State of Maryland and County of Calvert, this 10 day of September, 1997.

**WITNESS** my Hand and Notarial Seal: Michelle D. Hall
Notary Public

My Commission Expires: February 2, 1998
Date

CHC/PSF/dlm

Attachments: (1) Responses to Request for Additional Information
(2) Summary of Changes
(3) Amendment Revision by Change
(4) Amendment Revision by ITS Section

cc: M. L. Reardon, NRC

**(With Attachment 2 only)**

R. S. Fleishman, Esquire
J. E. Silberg, Esquire
Director, Project Directorate I-1, NRC
A. W. Dromerick, NRC
H. J. Miller, NRC
Resident Inspector, NRC
R. I. McLean, DNR
J. H. Walter, PSC

ATTACHMENT (1)

# IMPROVED TECHNICAL SPECIFICATIONS, REVISION 5

# RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION

Baltimore Gas and Electric Company
Calvert Cliffs Nuclear Power Plant
September 10, 1997

**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.1 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 3.4.1-1 | L.1 | JFD.1 | CTS 3.2.5 ACTION requires THERMAL POWER reduction to < 5% of RATED THERMAL POWER (RTP) if cold leg temperature cannot be restored to ≤ 548°F within two hours.<br><br>Under the same condition, ITS 3.4.1 ACTION D only requires THERMAL POWER reduction to ≤ 30% RTP.<br><br>STS 3.4.1 ACTION D includes the 30% of RTP value as a bracketed figure, indicating that a plant-specific value may be used in lieu of the STS value. However, the change from 5% to 30% of RTP is not consistent with the STS because the plant-specific value in CTS 3.5.2 ACTION is 5%, not 30%. | Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.<br><br>Provide additional discussion and justification demonstrating that power reduction to ≤ 30% RTP, versus the CTS value of ≤ 5% RTP, is acceptable based on plant specific analyses. | |
| ≤ | | | Furthermore, the acceptability of this change is justified merely by stating that the potential for violating the DNBR limit is very remote when operating at ≤ 30% RTP while cold leg temperature is not within limits. The No Significant Hazards Consideration (NSHC) also states that reducing power to ≤ 30% RTP ensures the potential for a DNB anomaly is remote. The NSHC further states that operating in accordance with this change results in meeting the DNBR criterion in the event of a DNB limited transient, and that operation in this manner ensures that a DNB limit will not be violated. No specific quantifiable information is provided or referenced, however. | | |

**CCNPP Response:**

The Current Technical Specification (CTS) 3.2.5, Improved Standard Technical Specification (ISTS) 3.4.1 and Improved Technical Specification (ITS) 3.4.1 markups will be modified to retain current licensing basis. DOC L.1 will not be used, and Justification for Deviation (JFD) 31 will be added.

DOC = Discussion of Change
JFD = Justification for Deviation

**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.1 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 3.4.1-2 | L.3 | JFD.1 | Performance of CTS Surveillance Requirement 4.2.5.2 is required at least once per 18 months.<br><br>In ITS SR 3.4.1.4, this Frequency is extended to 24 months.<br><br>STS SR 3.4.1.4 specifies an 18-month Frequency for this surveillance. The 18-month Frequency is a bracketed figure in the STS, indicating that a plant-specific value may be used in lieu of the STS value. The change from 18 months to 24 months is not consistent with the STS, however, because the plant-specific value in CTS Surveillance Requirement 4.2.5.2 is 18 months, not 24 months.<br><br>This change represents not only a relaxed CTS requirement, but also a deviation from the STS. | BEYOND SCOPE | |

**CCNPP Response:**

The 18-month frequency will be retained, and appropriate justifications provided.

DOC = Discussion of Change
JFD = Justification for Deviation

## ATTACHMENT (1)

### RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
### IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4

| 3.4.1 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 3.4.1-3 | L.2 | | CTS Surveillance Requirement 4.2.5.2 requires determining the Reactor Coolant System (RCS) total flow rate to be within its limit by measurement.<br><br>Discussion of change (DOC) L.2 states a note is added in ITS SR 3.4.1.4 which allows not performing this surveillance until 24 hours after reaching ≥ 90% RTP. The DOC goes on to say this change is required to ensure the test results are representative of RCS total flow, because the test results are more accurate when obtained at power levels > 90% RTP.<br><br>ITS SR 3.4.1.4 requires verifying measured RCS total flow rate is within limits. There is no note in ITS SR 3.4.1.4 to allow deferring this surveillance until 24 hours after reaching ≥ 90% RTP. Therefore, in this regard, there is no difference between CTS Surveillance Requirement 4.2.5.2 and ITS SR 3.4.1.4. | Correct or delete the L.2 DOC, and correct the CTS markup and/or the ITS accordingly. | |
| **CCNPP Response:**<br>The RCS total flow requirements were corrected as part of a supplemental amendment request dated June 9, 1997. | | | | | |

DOC = Discussion of Change
JFD = Justification for Deviation

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.1 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 3.4.1-4 | A.2 | | Most of the requirements contained in CTS 3/4.2.5, DNB Parameters, are placed in ITS 3.4.1, RCS Pressure, Temperature, and Flow DNB Limits.<br><br>However, CTS 3.2.5.d, requiring AXIAL SHAPE INDEX (ASI) and THERMAL POWER within specified limits, and its associated ACTION and Surveillance Requirements, are not placed in ITS 3.4.1, but are retained as ITS 3.2.5, Axial Shape Index.<br><br>Accordingly, any changes to these ASI requirements are addressed in the Discussion of Changes (DOCs) for ITS 3.2.5.<br><br>Since these requirements *are* retained, but are merely not placed in ITS 3.4.1, the CTS Markup should be annotated as such, rather than indicating the requirement is deleted, and then classifying this change as Administrative. | Correct the CTS Markup pages for ITS 3.4.1 to indicate that CTS 3.2.5.d and its associated ACTION and Surveillance Requirement are discussed in the conversion submittal DOCs for ITS 3.2.5, rather than being deleted as an Administrative Change. | |

**CCNPP Response:**

CTS Limiting Condition for Operation (LCO) 3.2.5.d markups will be revised to indicate that the requirements regarding Axial Shape Index are discussed in the DOCs for CTS 3.2.5. DOC A.2 will not be used.

**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.1 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 3.4.1-5 | | JFD.1 | STS 3.4.1.a and STS 3.4.1.b impose requirements on the value of pressurizer pressure and RCS cold leg temperature, respectively. Each of these parameters' required values is stipulated as a range of acceptable values, the lower limit designated with a ≥ sign, and the upper limit designated with a ≤ sign.<br><br>ITS 3.4.1.a and ITS 3.4.1.b do not include both upper and lower limits for these parametric requirements. Instead, ITS 3.4.1.a requires pressurizer pressure ≥ 2200 psia, and ITS 3.4.1.b requires RCS cold leg temperature ≤ 548°F.<br><br>Likewise, while STS SR 3.4.1.1 and STS SR 3.4.1.2 respectively require verification that pressurizer pressure and RCS cold leg temperature are within the specified upper and lower limits, ITS SR 3.4.1.1 requires verification of pressurizer pressure ≥ 2200 psia, and ITS SR 3.4.1.2 requires verification of RCS cold leg temperature ≤ 548°F.<br><br>Beyond incorporation of plant-specific numbers into the brackets, there is no discussion of the reason(s) for not adopting the STS format and content. | Provide discussion and justification for not incorporating the STS format and content with regard to the requirement for a specified range of acceptable values for pressurizer pressure and RCS cold leg temperature.<br><br>Base the justification on current licensing basis, system design, or operational constraints. | |

**CCNPP Response:**

Justification based on current licensing basis is included in JFD 32.



DOC = Discussion of Change
JFD = Justification for Deviation

**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.1 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 3.4.1-6 | | JFD 1 | STS 3.4.1.b imposes requirements on the value of RCS cold leg temperature, with a specified allowable band for < [70]% RTP, and a different specified allowable band for ≥ [70]% RTP. Likewise, STS SR 3.4.1.2 requires verification that RCS cold leg temperature is within its specified range for operation at either < [70]% RTP, or ≥ [70]% RTP, as applicable.<br><br>ITS 3.4.1.b and ITS SR 3.4.1.2 merely state the required value for RCS cold leg temperature as ≤ 548°F, regardless of reactor power level.<br><br>Beyond incorporation of plant-specific numbers into the brackets, there is no discussion of the reason(s) for not adopting the STS format and content. | Provide discussion and justification for not incorporating the STS format and content with regard to including two separate bands of acceptable values for RCS cold leg temperature, depending on reactor power level. Base the justification on current licensing basis, system design, or operational constraints. | |
| **CCNPP Response:**<br><br>Justification based on current licensing basis is included in JFD 32. | | | | | |
| 3.4.1-7 | | | STS SR 3.4.1.4 requires RCS total flow rate verified by performing a precision heat balance (a calorimetric calculation).<br><br>ITS SR 3.4.1.4 stipulates this verification by measuring the RCS total flow rate.<br><br>This STS deviation is based on TSTF-105. | Acceptance of this change is contingent on NRC approval of TSTF-105. | |
| **CCNPP Response:**<br><br>The RCS total flow rate verification based on current licensing basis is justified by JFD 29 as part of a supplemental amendment request dated June 9, 1997. | | | | | |

DOC = Discussion of Change
JFD = Justification for Deviation

**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.2 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 2 | A.3 | | CTS Surveillance Requirement 4.1.1.5 b includes a stipulation that the surveillance is required when the RCS $T_{avg}$ is < 525°F.<br><br>ITS SR 3.4.2.1 changes this stipulation by specifying $T_{avg}$ < 525°F *in any RCS loop*.<br><br>This change constitutes a more restrictive change rather than an administrative change. In addition, this change constitutes an STS deviation, the basis for which is CEOG-113. | Provide discussion and justification for the more restrictive change, including why it is preferable and acceptable to require performance of the required surveillance whenever *any one RCS loop's* $T_{avg}$ is < 525°F, rather than when the RCS $T_{avg}$ of unspecified loop(s) is < 525°F<br><br>Contingent upon CEOG-113. Has this been rejected. What is the TSTF number. | |
| **CCNPP Response:**<br><br>The RCS $T_{ave}$ requirements were restored to current licensing basis as part of a supplemental amendment request dated June 9, 1997 | | | | | |
| 3 | M.1 | | ITS SR 3.4.2.2 is added, requiring RCS $T_{avg}$ in each loop verified ≥ 515°F once per 12 hours when $T_{avg}$ in any RCS loop is ≥ 525°F.<br><br>This requirement is not included in CTS 3.1.1.5.<br><br>This change from the<br><br>CTS requirements is based on CEOG-113. | Contingent upon CEOG-113. Has this been rejected. What is the TSTF number. | |
| **CCNPP Response:**<br><br>The RCS $T_{ave}$ requirements were restored to current licensing basis as part of a supplemental amendment request dated June 9, 1997. | | | | | |
| 4 | | | STS 3.4.2 Applicability is MODE 1 with $T_{avg}$ in one or more RCS loops < [525]°F, and MODE 2 with $T_{avg}$ in one or more RCS loops < [535]°F and $K_{eff}$ ≥ 1.0.<br><br>ITS 3.4.2 Applicability is merely MODE 1, and MODE 2 with $K_{eff}$ ≥ 1.0.<br><br>The discussion and justification for this STS deviation is contained in CEOG-113. | Contingent upon CEOG-113. Has this been rejected. What is the TSTF number. | |
| **CCNPP Response:**<br><br>The RCS $T_{ave}$ and $K_{eff}$ applicability requirements were restored to current licensing basis as part of a supplemental amendment request dated June 9, 1997. | | | | | |

DOC = Discussion of Change
JFD = Justification for Deviation

**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.3 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 1 | A.1 | JFD.2 | CTS 3.4.9.1 requires maintaining RCS temperature and pressure within the limits indicated on Figures 3.4.9-1 and 3.4.9-2.<br><br>These curves, CTS Figures 3.4.9-1 and 3.4.9-2, are included on two pages in ITS 3.4.3, as Figures 3.4.3-1 and 3.4.3-2. However, the wording of ITS 3.4.3 includes no direction to maintain RCS temperature and pressure according to the limits on these curves, nor does ITS 3.4.3 provide reference to another document wherein specific limits may be obtained. ITS 3.4.3 merely requires RCS temperature and pressure ". . . maintained within limits."<br><br>STS 3.4.3 requires maintaining RCS temperature and pressure within the limits specified in the PTLR but, again, ITS 3.4.3 neither states nor references the specific required limits. | Add information showing where limits are specified. As in ...maintained within the limits shown in Figures_and . | |
| **CCNPP Response:**<br><br>Surveillance Requirement (SR) 3.4.3.1 identifies where the limits are located. | | | | | |
| 2 | A.1 | | The Applicability of CTS 3.4.9.1 is stated as, "At all times," but, within the text of CTS 3.4.9.1, this Applicability is further modified to, ". . . during heatup, cooldown, criticality, and inservice leak and hydrostatic testing . . ." | Add reference to criticality, and inservice leak and hydrostatic testing in ITS 3.4.3 or provide justification why it should nto be added. STS references PTLR which has this. Since you are not using PTLR, include all parameters in the LCO. | |
| **CCNPP Response:**<br><br>The markup of CTS 3.4.9.1 will be revised to properly reflect these changes. The acceptance criteria for ITS 3.4.3 will be contained on Figures 3.4.3-1 and 3.4.3-2. ITS SR 3.4.3.1 will invoke the figures. DOC A.2 will be added to justify these changes. | | | | | |

| 3.4.4 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| No comments for 3.4.4 | | | | | |

DOC = Discussion of Change
JFD = Justification for Deviation

| 3.4.5 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| Bases | | | TSTF 177 (CEOG 83) pending | Changes dependent upon completion of review of TSTF. | |
| **CCNPP Response:**<br>[Technical Specification Task Force] TSTF-177 references were removed, and ITS changed to match ISTS or changes were justified by current licensing basis, using JFD 27. The Bases were also modified to better reflect the LCO, justified in JFD-27. | | | | | |
| 1 | LA.1 | | The details of CTS 3.4.1.2.a.1 and 3.4.1.2.a.2, specifying precisely which two RCS loops shall be OPERABLE, and how many reactor coolant pumps in each of these two RCS loops must be OPERABLE, are moved to plant procedures. | Provide plant procedure(s) change conrol process. (50.59?) | |
| **CCNPP Response:**<br>Details will be moved to the Bases, and the change will be justified in LA.1. | | | | | |
| 2 | A.1 | | CTS 3.4.1.2 Applicability is modified by footnote ** which states that a reactor coolant pump shall not be started with the RCS temperature ≤ 365°F (Unit 1), ≤ 301°F (Unit 2).<br>In ITS 3.4.5 NOTE 2, the term "RCS temperature" is changed to "RCS cold leg temperature." There is no discussion or justification for this change.<br>Specifying which RCS temperature is applicable in meeting the limit enhances the Technical Specifications by removing ambiguity which exists in CTS 3.4.1.2 footnote **. The enhancement constitutes an additional restriction not found in CTS 3.4.1.2; therefore, this is a more restrictive change. | Provide discussion and justification for the more restrictive change, including, as applicable, how CTS 3.4.1.2 footnote ** is interpreted by plant operators, why it is advantageous to use cold leg temperature over other temperature sensor(s), how this enhancement improves plant safety, etc. | |
| **CCNPP Response:**<br>DOC A.3 will be added to justify changes made to clarify revisions to ITS 3.4.5 Note 2. | | | | | |

**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.5 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 3 | | | STS 3.4.5 NOTE b includes a criterion that core outlet temperature is maintained at least 10°F below saturation temperature.<br><br>Likewise, CTS 3.4.1.2.b footnote * states that core outlet temperature is maintained at least 10°F below saturation temperature.<br><br>However, ITS 3.4.5 NOTE 1.b changes the phrase, ". . . at least 10°F . . ." to ". . . ≥ 10°F . . ."<br><br>Placing the symbol meaning "greater than or equal to" and its associated numeric value directly adjacent to the word "below" causes the reader's mind to stumble. The intended meaning is more quickly grasped by using the phrase "at least 10°F below . . ."<br><br>The reason for this STS deviation is not clear, but it is justified by a handwritten comment in the STS 3.4.5 margin which states, "editorial generic." | Provide justification for the "generic editorial". Was this a TSTF? | |

**CCNPP Response:**

Notes for LCOs 3.4.5, 3.4.6, 3.4.7, and 3.4.8 will be changed to say "at least 10°F below" to be consistent with CTS and ISTS, and to be consistently applied, where appropriate.

| 3.4.6 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 1 | LA.1 | | The details of CTS 3.4.1.3.a.1, .2, .3, and .4, specifying precisely which two cooling loops of the four RCS and SDC loops possible shall be OPERABLE, and how many RCPs in any defined OPERABLE RCS loop(s) must be OPERABLE, are moved to plant procedures. | Provide information describing the plant procedure(s) to which the details of CTS 3.4.1.3.a.1, .2, .3, and .4 are moved, and how the plant procedures are controlled. | |

**CCNPP Response:**

Details will be moved to the Bases, and the change will be justified in LA.1.



DOC = Discussion of Change
JFD = Justification for Deviation

**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.6 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 2 | | | STS 3.4.6 NOTE b includes a criterion that core outlet temperature is maintained at least 10°F below saturation temperature.<br><br>Likewise, CTS 3.4.1.3.b footnote ** states that core outlet temperature is maintained at least 10°F below saturation temperature.<br><br>However, ITS 3.4.6 NOTE 1.b changes the phrase, ". . . at least 10°F . . ." to ". . . ≥ 10°F . . ."<br><br>Placing the symbol meaning "greater than or equal to" and its associated numeric value directly adjacent to the word "below" can cause the reader to stumble. The intended meaning is more quickly grasped by using the grammatically correct phrase ". . . at least 10°F below . . ."<br><br>The reason for this STS deviation is not clear, but it is justified by a handwritten comment in the STS 3.4.6 margin which states, "editorial generic." | Same as before. | |

**CCNPP Response:**

Notes for LCOs 3.4.5, 3.4.6, 3.4.7, and 3.4.8 will changed to say "at least $10^0$F below" to be consistent with CTS and ISTS, and to be consistently applied, where appropriate.

DOC = Discussion of Change
JFD = Justification for Deviation

**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.6 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 3 | A.6 | | Footnote * associated with CTS 3.4.1.3.a.3 and 3.4.1.3.a.4, allows the normal or emergency power source INOPERABLE for the SDC loops in MODE 5. ITS 3.4.6 does not include this allowance.<br><br>It is presumed that the handwritten "A.5" discussion of change (DOC) designator in the CTS markup for CTS 3.4.1.3.a.3 and 3.4.1.3.a.4 is in error, and was intended to be written "A.6." It is on the basis of this presumption that review of the A.6 change is performed.<br><br>If this presumption is incorrect, then the conclusion reached during the review of change A.6 must be re-addressed. | Correct or verify the "A.5" DOC designator in the CTS markup for CTS 3.4.1.3.a.3 and 3.4.1.3.a.4. | |
| **CCNPP Response:**<br>The CTS 3.4.1.3.a.3 and 3.4.1.3.a.4 will be modified to reference DOC A.6 instead of A.5. | | | | | |
| 4 | A.5 | | CTS 3.4.1.3 Applicability footnote # references CTS Special Test Exception (STE) 3.10.5. ITS 3.4.6 deletes the reference to STE 3.10.5.<br><br>It is presumed that in the CTS markup, the handwritten lines extending from the "A.5" DOC designator to the footnote * designator for CTS 3.4.1.3.a.3 and 3.4.1.3.a.4 are in error, and were actually intended to extend to the footnote # designator for CTS 3.4.1.3 Applicability MODE 4.<br><br>It is on the basis of this presumption that review of the A.5 change is performed.<br><br>If this presumption is incorrect, then the conclusion reached during the review of change A.5 must be re-addressed. | In the CTS markup, correct or verify the handwritten lines extending from the "A.5" designator to the footnote * designator for CTS 3.4.1.3.a.3 and 3.4.1.3.a.4. | |
| **CCNPP Response:**<br>The CTS 3.4.1.3.a.3 and 3.4.1.3.a.4 will be modified to reference DOC A.5 instead of A.6. | | | | | |

DOC = Discussion of Change
JFD = Justification for Deviation

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.6 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 5 | M.3 | | CTS 3.4.1.3 ACTION b prescribes operator actions in the event that no coolant loop is in operation. ITS 3.4.6 ACTION C includes the equivalent Condition of no RCS or SDC loops in operation, but also adds the Condition of required RCS or SDC loops INOPERABLE; the two described Conditions are linked by an OR statement.<br><br>The justification focuses on changing the one-hour completion time of CTS 3.4.1.3 ACTION b to a completion time of immediately in ITS 3.4.6 ACTION C, but does not address the further enhancement of adding the Condition of required RCS or SDC loops INOPERABLE. While reasoning for this enhancement may be intuitively obvious, the change must be discussed and justified in the license amendment submittal. | Provide discussion and justification for the more restrictive change of adding the Condition of required RCS or SDC loops INOPERABLE to ITS 3.4.6 ACTION C. | |

**CCNPP Response:**

DOC M.3 will be provided for the addition of the Condition with required RCS or shutdown cooling (SDC) loops being inoperable.

**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.7 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 1 | L.1 | | If credit is taken for RCS loop(s) OPERABLE for decay heat removal, then CTS 3.4.1.3.a.1 and 3.4.1.3.a.2 stipulate at least one associated RCP OPERABLE in the OPERABLE loop(s).<br><br>In ITS 3.4.7, RCP OPERABILITY is not a requirement, if credit is taken for the RCS loops as the backup decay heat removal method.<br><br>The justification states that acceptability of this change is based on:<br><br>- The large contained volume of secondary side water providing a heat sink for the RCS, and<br><br>- Forced RCS flow not necessary because natural circulation is sufficient to remove the small decay heat load generated by the reactor core until at least one SDC loop is made OPERABLE and/or placed in operation.<br><br>There is no specific information provided or described upon which to measure acceptability of the change. | Provide additional discussion and justification for the changed CTS requirement to quantifiably demonstrate adequacy of the SGs' combined heat sink capability, with both SG secondary side water levels at -50 inches, and without forced RCS flow. Development of this justification should include analysis or verification, using the most conservative case (full power history and minimum time to get to MODE 5), of heat transfer rates. The following items should be addressed, as applicable:<br><br>- Maximum core decay heat generation rate,<br><br>- Total primary to secondary heat transfer area,<br><br>- Heat transfer coefficient(s),<br><br>- Relative applicable primary and secondary temperatures,<br><br>- Total natural circulation flow rate,<br><br>- Combined SGs' ambient heat loss rate. | |

**CCNPP Response:**

DOC L.1 will be modified to state that the evaluation of natural circulation was conducted to meet the intent of NUMARC Guidance document 91-06 (Guidelines for Industry Action to Assess Shutdown Management).

DOC = Discussion of Change
JFD = Justification for Deviation

| 3.4.7 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 2 | L.2 | | The requirements of CTS 3.4.1.3 stipulate both RCS loops in operation if both SDC loops are removed from operation while in MODE 5.<br><br>ITS 3.4.7 NOTE 4 allows removing both SDC loops from operation during planned heatup from MODE 5 to MODE 4 when at least one RCS loop is in operation. This effectively reduces the CTS 3.4.1.3 requirement from both RCS loops to only one RCS loop in operation. | Provide additional discussion for the less restrictive change based on plant operations. Address factors relating to backup (standby) cooling capabilities of the SDC and RCS loops not in operation; the ability to restore one or both required SDC loops to operation if the decision to achieve MODE 4 is reversed; the intended heatup path obviating the need for the same level of required decay heat removal capability as when no heatup is intended; and so forth, as appropriate. | |
| **CCNPP Response**:<br><br>DOC L.2 will be revised to explain why the addition of the Notes is acceptable. ISTS Bases markups were appropriately changed. DOC L.1 for ITS 3.4.8 was also revised. | | | | | |
| 3 | L.2 | | The CTS 3.4.7 markup includes an insert for placement as ITS 3.4.7 NOTE 2, which allows removing one required SDC loop from operation for up to 2 hours provided the other SDC loop is OPERABLE and in operation.<br><br>However, ITS 3.4.7 NOTE 2 changes the word "loop" to the word "train," so the last of the sentence reads, ". . . provided the other SDC train is OPERABLE and in operation."<br><br>The terms loop and train are not equivalent; there is no discussion or justification for this change from the CTS markup. | Provide discussion and justification for this change from the CTS markup, including why the term "train" is preferable to the term "loop" in this instance.<br><br>Since, in some places in the ITS, the term train is left in, explain when there is a difference. | |
| **CCNPP Response:**<br><br>Changes will be made to ITS 3.4.7 and 3.4.8 to reflect that the term loop is appropriate. | | | | | |

| 3.4.7 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 4 | LA.2 | | CTS Surveillance Requirement 4.4.1.3.1 requires verifying correct breaker alignments and indicated power availability for SDC loop valves associated with required OPERABLE SDC loop(s) which are not in operation. Note that this requirement refers to the SDC loop(s) required OPERABLE, but *not* in operation (the standby loop).<br><br>ITS 3.4.7 does not retain the requirement to verify correct breaker alignment and indicated power availability for SDC loop valves associated with required OPERABLE SDC loop(s) which are not in operation.<br><br>The discussion of change indicates that this detail is moved to the ITS 3.4.7 Bases. However, the ITS 3.4.7 Bases only infers that SDC loop valve power must be available, and this inference is with regard to verifying one required OPERABLE coolant loop *in operation* (italics added) by verifying flow rate, temperature, or pump status monitoring. | Provide additional information in the Bases. | |

**CCNPP Response:**

ITS SR 3.4.7.3 will be revised to include the requirement regarding the SDC valves.

| 3.4.7 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 5 | | | STS 3.4.7 NOTE 1.b includes a criterion that core outlet temperature is maintained at least 10°F below saturation temperature.<br><br>Likewise, CTS 3.4.1.3.b footnote " states that core outlet temperature is maintained at least 10°F below saturation temperature.<br><br>However, ITS 3.4.7 NOTE 1.b changes the phrase, ". . . at least 10°F . . ." to ". . . ≥ 10°F . . ."<br><br>Placing the symbol meaning "greater than or equal to" and its associated numeric value directly adjacent to the word "below" can cause the reader to stumble. The intended meaning is more quickly grasped by using the grammatically correct phrase ". . . at least 10°F below . . ."<br><br>The reason for this STS deviation is not clear, but it is justified by a handwritten comment in the STS 3.4.6 margin which states, "editorial generic." | Same as before. | |
| **CCNPP Response:**<br><br>Notes for LCOs 3.4.5, 3.4.6, 3.4.7, and 3.4.8 will changed to say "at least 10°F below" to be consistent with CTS and ISTS, and to be consistently applied, where appropriate. | | | | | |
| 6 | LA.1 | | CTS 3.4.1.3.a.3 and 3.4.1.3.a.4 identify, by loop number, the SDC loops required OPERABLE. ITS 3.4.7 also imposes requirements on SDC loop(s) OPERABILITY, but does not identify the specific SDC loop numbers. This detail is moved to plant procedures. Theplant procedures to which this detail is moved are not identified. | Provide additional information describing the plant procedure(s) control (50.59?). | |
| **CCNPP Response:**<br><br>Details will be moved to the Bases, and the change will be justified in LA.1. | | | | | |

DOC = Discussion of Change
JFD = Justification for Deviation

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.8 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 1 | LA.1 | | CTS 3.4.1.3.a.3 and 3.4.1.3.a.4 identify, by loop number, the SDC loops required OPERABLE. ITS 3.4.8 also imposes requirements on SDC loop(s) OPERABILITY, but does not identify the specific SDC loop numbers. This detail is moved to plant procedures. The plant procedures to which this detail is moved are not identified. | Provide change control process (5..59?). | |
| **CCNPP Response:**<br>Details will be moved to the Bases, and the change will be justified in LA.1. | | | | | |
| 2 | LA.2 | | CTS Surveillance Requirement 4.4.1.3.1 requires verifying correct breaker alignments and indicated power availability for SDC loop valves associated with required OPERABLE SDC loop(s) which are not in operation. Note that this requirement refers to the SDC loop(s) required OPERABLE, but *not* in operation (the standby loop).<br><br>ITS 3.4.8 does not retain the requirement to verify correct breaker alignment and indicated power availability for SDC loop valves associated with required OPERABLE SDC loop(s) which are not in operation.<br><br>The discussion of change indicates that this detail is moved to the ITS 3.4.8 Bases. However, the ITS 3.4.3 Bases only infers that SDC loop valve power must be available, and this inference is with regard to verifying one required OPERABLE coolant loop *in operation* (italics added) by verifying flow rate, temperature, or pump status monitoring.<br><br>Because CTS Surveillance Requirement 4.4.1.3.1 addresses the required loop which is not in operation, this change is a less restrictive change for which there is no justification. | Provide Bases discussion that clearly indicates verification of power to the valves. | |
| **CCNPP Response:**<br>ITS SR 3.4.8.2 will be revised to include the requirement regarding the SDC valves. | | | | | |

DOC = Discussion of Change
JFD = Justification for Deviation

**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.9 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 2 | | JFD.26 | The discussion of change states that ITS 3.4.9 requires two pressurizer heater banks OPERABLE, each with the capacity of ≥ 150kW and capable of being supplied by an emergency power supply source. ITS 3.4.9 does not specify that each heater bank must be capable of being supplied by an emergency power source. Not specifying that each heater bank must be capable of being supplied by an emergency power source deviates from STS LCO 3.4.9.b which requires two banks or pressurizer heaters OPERABLE with the capacity of each group ≥ 150 kW and capable of being powered from an emergency power supply. JFD 26 does not adequately discuss and justify this deviation from the STS. | Retain statement, "...capable of being powered from and emergency power supply. It is in the CTS and bracketed material stays in the LCO if it is applicable. | |
| **CCNPP Response:**<br>The Bases will be modified to state that the pressurizer heaters are permanently powered by Class 1E power supplies, and JFD 26 was revised to provide additional justification. | | | | | |
| 3 | | JFD.27 | ITS SR 3.4.9.2 adds a new requirement to verify pressurizer heater bank capacity ≥ 150 kW every 24 months. CTS Surveillance Requirement 4.4.4 does not contain this requirement. The STS SR 3.4.7.2 markup shows that the STS Frequency of 92 days is changed to 24 months. This change references TSTF-93 as its basis. There is inadequate discussion and justification for this deviation from the STS. | Acceptance of this change is contingent upon NRC approval of TSTF-93. TSTF is pending. However, it has been recommended that the NOTE be placed in the SR if we allow the change in surveillance frequency. Also, this may be further review. Since the SR is not in your CTS and you are changing the frequency to 24 months rather than the bracketed 18, we may need to revisit this. | |
| **CCNPP Response:**<br>JFD-27 will be modified to justify acceptability of 24-month SR frequency. This is a more restrictive change that is not contained in the CTS. | | | | | |
| 4 | | JFD.21 | STS SR 3.4.9.3 is deleted. There is inadequate discussion and justification for this STS deviation. | Provide discussion of the semming conflict between Discussion of Deviations from NUREG # 21 and 26. Retain the SR. | |
| **CCNPP Response:**<br>JFD 21 will be revised to provide additional justification. | | | | | |

DOC = Discussion of Change
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**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.10 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 1 | | | Change in Applicability from MODES 1, 2, 3, and 4 | **Possible Beyond Scope Issue.** Additional justification is needed to deviate from the STS. The STS has an LTOP specification also that covers a different temperature. MOPDE 4 in this LCO is > [285], while the LTOP LCO is < [285]. Retain the LCO as is in the STS. Change Bases accordingly. | |
| **CCNPP Response:**<br>DOC L.1 will be revised to provide additional justification for the change in applicability. The pressurizer safety valves provide pressure protection above the LTOP enable temperature. DOC M.1 is withdrawn because the resulting changes eliminate any need for DOC M.1. | | | | | |
| 2 | | JFD-8 | CTS 3.4.2.1 LCO statement specifies the actual pressurizer safety valves that shall be OPERABLE and provides their respective As-Found and As-Left tolerances as a percent function of their lift settings. ITS 3.4.10 LCO statement requires 2 pressurizer safety valves OPERABLE. The above details for each valve are moved into ITS SR 3.4.10.1. | If the valve settings will be moved to the SR, the As-Left Tolerences, which corresponds to the STS should be left in also. | |
| **CCNPP Response:**<br>The as-left tolerances are left in the SRs as described in JFD-8 and in accordance with the writer's manual. | | | | | |

DOC = Discussion of Change
JFD = Justification for Deviation

| 3.4.10 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 3 | M.1 | | The discussion of change states that ITS 3.4.10 adds an intermediate step to the shutdown track required by CTS 3.4.2.1. This is not the case. CTS 3.4.2.1 requires shutdown to MODE 4 within 12 hours with one pressurizer safety valve inoperable. ITS 3.4.10 only requires shutdown to MODE 3 within 6 hours and reducing RCS cold leg temperatures to $\leq 365^{\circ}F$ (Unit 1; $\leq 301^{\circ}F$ Unit 2) within 12 hours. ITS 3.4.10 does not require further shutdown to MODE 4. Therefore, the shutdown to MODE 3 is not an intermediate step. | Correct the discussion of change to accurately reflect the content of ITS 3.4.10. | |
| **CCNPP Response:**<br>DOC L.1 will be revised to provide additional justification for the change in applicability. The pressurizer safety valves provide pressure protection above the LTOP enable temperature. DOC M.1 is withdrawn because the resulting changes eliminate any need for DOC M.1. | | | | | |
| 4 | L.1 | | CTS 3/4.2.1 contains a footnote specifying that both pressurizer safety valves may be removed in MODE 5 provided that at least one valve is replaced by a spool piece which allows the pressurizer to relieve directly to the quench tank. This footnote is referenced to the L.1 discussion of change. ITS 3.4.10 does not contain any mention of the requirements contained in this footnote. There is no discussion or justification for this change. | Provide discussion and justification for this change to CTS requirements. Specify where this requirement is now located. Relocate to Bases? | |
| **CCNPP Response:**<br>DOC L.1 will be revised to address elimination of the footnote * of CTS LCO 3.4.2.1. | | | | | |



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**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.11 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 1 | | JFD.25 | ITS 3.4.11 Required Action A.1 broadens the applicability of CTS 3.4.3 Action a through a Note which allows delaying the Required Action for ≤ 120 hours if one block valve is inoperable and ≤ 72 hours if two block valves are inoperable. However, adding this Note to ITS 3.4.11 Required Action A.1 is a deviation from the STS. There is inadequate discussion and justification for this STS deviation. | This May Be Beyond Scope<br>What does consistent with the current licensing basis mean? Is it or is it not? Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints. | |
| **CCNPP Response:**<br>This change will be withdrawn and current licensing basis instated, and JFD 25 withdrawn. | | | | | |
| 2 | LA.1 | | CTS Surveillance Requirement 4.4.3.1.a requires performing a Channel Functional Test at least once per 31 days in accordance with the Reactor Protective System (RPS) Pressurizer Pressure Surveillance Test Procedure. ITS SR 3.4.11.1 requires performing the CHANNEL FUNCTIONAL TEST, but does not specify that it be done in accordance with the RPS Pressurizer Pressure Surveillance Test Procedure, thereby moving the CTS requirement outside of the ITS into licensee-controlled documents. The discussion of change does not specify which licensee-controlled documents contain this requirement. | Specify the controls for the change process. (50.59?) | |
| **CCNPP Response:**<br>DOC A.5 will be added to explain that the change is actually administrative, the requirements will be retained in the ITS, and DOC LA.1 will be withdrawn. | | | | | |
| 3 | | JFD.12 | CTS Surveillance Requirement 4.4.3.1.a requires performing a CHANNEL FUNCTIONAL TEST once per 31 days. ITS SR 3.4.11.1 retains this CTS requirement. However, adding ITS SR 3.4.11.1 is a deviation from the STS. There is inadequate discussion and justification for this STS deviation. | Provide discussion based on current licensing basis, system design, or operational constraints. | |
| **CCNPP Response:**<br>JFD.12 will be enhanced to provide additional justification and system description. | | | | | |



DOC = Discussion of Change
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**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.11 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 4 | L.1 | | ITS 3.4.11 Action A relaxes the CTS 3.4.3 Action a requirement of having one or more PORV(s) with excessive seat leakage to one or more PORVs inoperable and capable of being manually cycled. CTS 3.4.3 Actions b and c specify Required Actions and Completion Times for one PORV (Action b) and both PORVs (Action c) inoperable for causes other than excessive seat leakage. ITS 3.4.11 Actions B and D change these CTS requirements to one PORV (Action B) and two PORVs (Action D) inoperable and not capable of being manually cycled respectively. are briefly addressed. The only discussion and justification for these changes to CTS Actions is a reference to the ITS 3.4.11 Action A less restrictive change. Although related to the ITS 3.4.11 less restrictive change, these changes are separate issues. There is inadequate discussion and justification for the CTS 3.4.3 Actions b and c changes. | Provide additional discussion and justification for the CTS 3.4.3 Actions b and c changes.<br><br>NOTE: THIS LCO HAS TO BE REVIEWED IN ITS ENTIRETY BEFORE THE MAGNITUDE OF CHANGES ARE ALL ACCEPTED. | |
| **CCNPP Response:**<br>DOC L.1 will be enhanced to provide additional justification for the changes to Actions a, b, and c of LCO 3.4.11. | | | | | |
| 5 | L.2 | | CTS Surveillance Requirement 4.4.3.1.a requires performing the PORV STE every 31 days. ITS SR 3.4.11.1 extends the SR-Frequency to 92 days. The discussion of change states that the PORV actuation instrumentation is the same as that used for the RPS High Pressurizer Pressure Function. The RPS High Pressurizer Pressure Function STE Surveillance Frequency was decreased from 31 days to 92 days in the RPS and ESFAS "monthly to quarterly" Technical Specification change (approved in an NRC Safety Evaluation Report for Amendments 193 and 170 for Units 1 and 2, respectively, dated August 24, 1994). | This change is not necessarily acceptable simply because of the approval of the amendments. These have to be evaluated in their own right. | |
| **CCNPP Response:**<br>DOC L.2 will be modified to enhance the justification for this change. | | | | | |

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**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.11 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 6 | | JFD.12 | CTS Surveillance Requirements 4.4.3.1.a and b require performing a CHANNEL FUNCTIONAL TEST once per 31 days, and performing a CHANNEL CALIBRATION once per REFUELING INTERVAL respectively. ITS 3.4.11 retains these requirements by adding two SRs, ITS SR 3.4.11.1 and ITS SR 3.4.11.4. Adding these SRs is a deviation from the STS. There is inadequate discussion and justification in for this STS deviation. | Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints. | |
| **CCNPP Response:**<br>JFD.12 will be enhanced to provide additional justification and system description. | | | | | |
| 7 | | JFD.11 | STS 3.4.11 Action D requires shutting down to MODE 3 in 6 hours and to be in MODE 4 in 12 hours if the Required Actions and Completion Times of Condition A, B, or C are not met. ITS 3.4.11 Actions do not contain this requirement; it is deleted. Deleting this requirement in the ITS is a deviation from the STS. The justification for this deviation includes reference to Amendments 188 and 165 (for Units 1 and 2 respectively). There is inadequate discussion and justification for this STS deviation. | NOTE: THIS LCO HAS TO BE REVIEWED IN ITS ENTIRETY BEFORE THE MAGNITUDE OF CHANGES ARE ALL ACCEPTED. | |
| **CCNPP Response:**<br>JFD.11 has been enhanced, and the ITS modified, to better explain and describe the current licensing basis. | | | | | |

DOC = Discussion of Change
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**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.11 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 8 | | JFD.11 | STS 3.4.11 Action E specifies the Required Actions and Completion Times for two PORVs inoperable and not capable of being manually cycled. STS 3.4.11 Required Action E.3 and E.4 require shutdown to MODE 3 in 6 hours and be in MODE 4 in 12 hours. ITS 3.4.11 Action D retains this requirement. However, ITS 3.4.11 Action D deletes the requirements of STS 3.4.11 Action E.3 and E.4. These STS requirements are replaced by ITS 3.4.11 Action D.3 which requires restoring one PORV to OPERABLE status in 72 hours. This is a deviation from the STS. The justification for this deviation includes reference to Amendments 188 and 165 (for Units 1 and 2 respectively). There is inadequate discussion and justification for this STS deviation. | Same | |
| **CCNPP Response:**<br>JFD.11 has been enhanced, and the ITS modified, to better explain and describe the current licensing basis. | | | | | |
| 9 | | JFD.1 | STS SR 3.4.11.4 is not included in the ITS 3.4.11 SRs. It is deleted. Deleting this STS SR is an STS deviation. There is inadequate discussion and justification for deleting this STS SR. | Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints. | |
| **CCNPP Response:**<br>JFD.34 has been added to justify deletion of Standard Technical Specification (STS) SR 3.4.11.4. | | | | | |

DOC = Discussion of Change
JFD = Justification for Deviation

RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4

| 3.4.12 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 1 | | | This LCO will has to BE looked at in its entirety again for conformance to your licensing basis and current requirements. It is difficult to know what is in the LCO because of amendments and what is there for other reasons. a road map would help. | What does "to make it consistent with"? Was the amendment issued for the particular change. Provide a detailed discussion of the changes allowed based on the amendments stated, not those that were deemed consistent with or other changes that were allowed. It is necessary to distinguish actual changes allowed by amendments from those inferred by the amendment. Identify each amendment with each change and state specifically what these amendments allowed. Additional questions may then be generated. | |
| **CCNPP Response:** JFD 14 will be upgraded to better explain what changes to the current licensing basis are associated with various amendments to the CTS. | | | | | |
| 2 | A.4 | | CTS 3.4.9.3 Action g actions are deleted in the ITS 3.4.12 Actions because they are addressed in other ITS requirements. Specifically, if excessive flow is encountered, the LTOP System is declared inoperable and the appropriate Actions of ITS 3.4.12 are entered. Similarly, if a P/T violation is found to have occurred, the appropriate Actions of ITS 3.4.3 are entered. The discussion of change also states that the CTS 3.4.9.3 Action g requirement to verify that the excessive flow did not raise pressure above the P/T limits is addressed in ITS 3.4.3. This is not the case; ITS 3.4.3 does not require this Action. There is inadequate discussion and justification for deleting this particular element of the CTS 3.4.9.3 Action g requirements. | Provide additional discussion and justification for deleting the requirement to verify a P/T violation did not occur during an excessive HPSI flow event. Specify where this requirement now resides. | |
| **CCNPP Response:** DOC L.5 was added to justify deletion of this Action from the CTS. DOC A.4 was upgraded to better explain the disposition of the CTS Action statements. | | | | | |

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.12 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 3 | LA.1 | | CTS 3.4.9.3 LCO statements b, c, d, and e; and CTS 3.4.9.3 Actions e and f specify requirements for HPSI pump operation when the LTOP System is applicable. ITS 3.4.12 does not contain these requirements. The discussion of change states that these requirements are moved either fully or partially into plant procedures. However, it remains unclear which portions of the CTS requirements remain in the ITS. | Specify which portions of the CTS 3.4.9.3 LCO statements b, c, d, and e; and CTS 3.4.9.3 Actions e and f remain in ITS 3.4.12. Also state what goes to the Bases and what to Plant Procedures. Identify the change control process for Plant Procedures(50.59?). | |
| **CCNPP Response:**<br>DOC LA.1 has been modified to state that CTS 3.4.9.3 LCO statements b, c, e, and 3.4.9.3 Actions e and f regarding high pressure safety injection (HPSI) pump operation when the Low Temperature Overpressure Protection (LTOP) System is applicable will be moved to the ITS bases. Details in CTS 3.4.9.3 LCO d will be retained in LCO 3.4.12. The mark-up of the CTS 3.4.9.3 LCO will be modified to clarify which portion of the CTS remain in the ITS. | | | | | |
| 4 | LA.1 | | CTS 3.4.9.3 LCO statements b, c, d, and e; and CTS 3.4.9.3 Actions e and f specify requirements for HPSI pump operation when the LTOP System is applicable. ITS 3.4.12 does not contain these requirements. The discussion of change states that these requirements are moved either fully or partially into plant procedures. | SAME AS ABOVE | |
| **CCNPP Response:**<br>DOC LA.1 has been modified to state that CTS 3.4.9.3 LCO Statements b, c, e, and 3.4.9.3 Actions e and f regarding HPSI pump operation when the LTOP System is applicable will be moved to the ITS bases. Details in CTS 3.4.9.3 LCO d will be retained in LCO 3.4.12. | | | | | |

| 3.4.12 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 5 | | JFD.14 | The CTS 3.4.9.3 LCO statement a.1 requires tow PORVs with a trip setpoint below the curve in Figure 3.4.9-3. ITS 3.4.12 LCO statements a and b modify the CTS 3.4.9.3 LCO statement by adding the phrase "on or" to the CTS statement of "below the curve." This ITS 3.4.12 change to the CTS is a deviation from the STS. The discussion and justification for this STS deviation states that the changes are made to the STS to make it consistent with Amendments 188, 171, 146, and 145 (Unit 1); and Amendments 178, 165, and 131 (Unit 2). | SAME AS COMMENT # 1. | |
| **CCNPP Response:**<br>JFD 14 will be upgraded to better explain what changes to the current licensing basis are associated with various amendments to the CTS. | | | | | |
| 6 | | JFD.14 | CTS 3.4.3.3 Action c requires depressurizing and venting the RCS and then maintaining the unit in the vented condition. ITS 3.4.12 Actions D and E retains the CTS 3.4.9.3 Action c requirement to depressurize and vent the RCS by requiring depressurizing and venting the RCS. However, ITS 3.4.12 Actions D is added to the STS 3.4.12 Actions, making this a deviation from the STS. The justification for this STS deviation states in part that the changes are made to the STS to make it consistent with Amendments 188, 171, 146, and 145 (Unit 1); and Amendments 178, 165, and 131 (Unit 2). | see comment # 1 | |
| **CCNPP Response:**<br>JFD 14 will be upgraded to better explain what changes to the current licensing basis are associated with various amendments to the CTS. | | | | | |

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.12 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 7 | | JFD.24 | CTS 3.4.9.3 MODES OF APPLICABILITY requires RCS temperature ≤ 365°F and the RCS vented to < 8 square inches. ITS 3.4.12 MODES OF APPLICABILITY changes the CTS MODES OF APPLICABILITY to specify MODE 3 with all RCS cold leg temperatures ≤ 365°F (Unit 1) and ≤ 301°F (Unit 2), and MODES 4, 5, and 6. This change in the CTS MODES OF APPLICABILITY is a deviation from the STS. | Provide discussion regarding system design. | |
| **CCNPP Response:**<br>JFD 14 will be upgraded to better explain what changes to the current licensing basis are associated with various amendments to the CTS. | | | | | |
| 8 | | JFD.14 | The CTS 3.4.9.3 MODES OF APPLICABILITY requirement that the RCS is vented to < 8 square inches is moved to a Note in the ITS 3.4.12 MODES OF APPLICABILITY. Adding this Note to the ITS 3.4.12 MODES OF APPLICABILITY is a deviation to the STS. The justification for this deviation states that the changes are made to the STS to make it consistent with Unit 1 Amendments 188, 171, 146, and 145 and Unit 2 Amendments 178, 165, and 131. | SEE COMMENT # 1 | |
| **CCNPP Response:**<br>JFD 14 will be upgraded to better explain what changes to the current licensing basis are associated with various amendments to the CTS. | | | | | |

DOC = Discussion of Change
JFD = Justification for Deviation

| 3.4.12 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 9 | | JFD.14 | In addition to the HPSI pump requirement, the STS 3.4.12 LCO statement requires one charging pump capable of injecting into the RCS and having the SITs isolated. The ITS 3.4.12 LCO statement does not include the charging pump and SIT requirements. This is a deviation from the STS. There is inadequate discussion and justification for this STS deviation. The justification for this deviation states that the changes are made to the STS to make it consistent with Unit 1 Amendments 188, 171, 146, and 145 and Unit 2 Amendments 178, 165, and 131. | SAME | |
| **CCNPP Response:**<br>JFD 14 will be upgraded to better explain what changes to the current licensing basis are associated with various amendments to the CTS. | | | | | |
| 10 | | JFD.14 | ITS 3.4.12 adds a new LCO statement requiring one OPERABLE PORV with lift setting on or below the curve in Figure 3.4.12-1 and RCS vent of ≥ 1.3 square inches. This new ITS LCO statement is a deviation from the STS. The justification for this deviation states that the changes are made to the STS to make it consistent with Unit 1 Amendments 188, 171, 146, and 145 and Unit 2 Amendments 178, 165, and 131. | SAME | |
| **CCNPP Response:**<br>JFD 14 will be upgraded to better explain what changes to the current licensing basis are associated with various amendments to the CTS. | | | | | |



DOC = Discussion of Change
JFD = Justification for Deviation

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.12 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 11 | | JFD.14 | ITS 3.4.12 adds a new Note to the LCO statements specifying HPSI pump restrictions and PORV lift settings when in shutdown cooling. This new ITS LCO Note is a deviation from the STS. The justification for this deviation states that the changes are made to the STS to make it consistent with Unit 1 Amendments 188, 171, 146, and 145 and Unit 2 Amendments 178, 165, and 131. | | |
| **CCNPP Response:**<br>The Note to ITS LCO 3.4.12 will be replaced with modifications to the LCO, and JFD 14 will be modified to reflect these changes, and to better explain what changes to the current licensing basis are associated with various amendments to the CTS. | | | | | |
| 12 | | | The STS 3.4.12 MODES OF APPLICABILITY Note is deleted in the ITS 3.4.12 MODES OF APPLICABILITY. The STS MODES OF APPLICABILITY Note specifies SIT limitations related to RCS cold leg temperatures and P/T limit curves. Deleting this Note in the ITS is a deviation from the STS. There is no discussion or justification for deleting this Note. | Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints. | |
| **CCNPP Response:**<br>JFD 14 will be upgraded to better explain why the SIT Note in the STS is removed. | | | | | |
| 13 | | JFD.20 | STS SR 3.4.12.4 requires verifying RCS vent ≥ [1.3] square inches is open once per 12 hours for unlocked open vent valve(s) and once per 31 days for locked open vent valve(s). This requirement in contained in ITS SR 3.4.12.2. However, the ITS SR changes the STS requirement by adding a Note to the 31 day Frequency specifying that the 31 day Frequency is applicable to the pressurizer manway. This change is a deviation from the STS. There is inadequate discussion and justification for this STS deviation. | Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.<br>Explain what the pressurizer manway has to do with this SR and why.<br>THIS MAY BE A BEYOND SCOPE ISSUE | |
| **CCNPP Response:**<br>The Note to ITS SR 3.4.12.2 and JFD 20 have been withdrawn. | | | | | |

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JFD = Justification for Deviation

| 3.4.13 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 2 | A.2 | | ITS 3.4.13 does not contain the RCS leakage instrumentation referenced by CTS 3.4.6.2. The discussion of change states that the deleted monitors are required by other ITS Specifications, but does not specify which ones. | Specify the ITS Specifications that now contain these SRs. | |
| **CCNPP Response:**<br>DOC A.2 will be revised to justify the deletion of CTS surveillance requirements 4.4.6.a.2 and 4.4.6.2.c. | | | | | |
| 4 | A.3 | | Most of the discussion focuses on the addition of ITS SR 3.4.13.2 to the CTS 3.4.6.2 requirements. However, at the end of the discussion, the focus changes to the addition of an "OR" statement to ITS 3.4.13 Action B. The discussion states that the "OR" statement is added to CTS 3.4.6.2 Action a ("With any PRESSURE BOUNDARY LEAKAGE, be in at least HOT STANDBY within 6 hours and in COLD SHUTDOWN within the following 30 hours."). The new ITS 3.4.13 Action B "OR" statement specifies "One or more SGs inoperable." to account for a Condition with one or two SGs inoperable. The new ITS 3.4.13 Action B "OR" statement adds a requirement to CTS 3.4.6.2 and is therefore a more restrictive change. There is inadequate discussion and justification to support this more restrictive change. This more restrictive change is not consistent with the STS. Additionally, the STS markup for this change references TSTF 138. | TSTF 138 was rejected by NRC 4/11/97. Revise LCO accordingly. | |
| **CCNPP Response:**<br>Changes associated with TSTF-138 will be withdrawn. The ISTS Bases markup for ITS SR 3.4.13.2 will be changed to indicate that compliance with LCO 3.0.3 is required when one or more steam generators do not meet the requirements of the steam generator tube surveillance program. This deviation will be justified by JFD 13, and DOCs A.3 and A.5 will be revised. DOC M.1 will be withdrawn. | | | | | |

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.13 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 5 | A.5 | | ITS SR 3.4.13.2 requires verifying SG tube integrity per the Steam Generator Tube Surveillance Program. CTS 3.6.4.2 does not contain this requirement, nor does the discussion present issues associated with CTS 3.6.4.2. Instead, the discussion focuses on CTS LCO 3.4.5, "Steam Generators," which requires each SG Operable, and specifies required SG tube Surveillance Requirements. CTS 3.4.5 is incorporated into ITS 5.5.9, "Steam Generator (SG) Tube Surveillance Program." Although ITS 3.4.13 neither specifically requires the SGs Operable, nor specifies SG tube SRs, it does place limits on RCS leakage, indirectly requiring the SGs Operable. CTS 3.4.5 is included with the CTS 3.6.4.2 markup, and is the location of the A.5 comment. The discussion states that CTS 3.4.5 is incorporated into ITS 3.4.13. This is not the case. CTS 3.4.5 is incorporated into ITS 5.5.9. ITS SR 3.4.13.2 adds a requirement to the CTS and is therefore a more restrictive change. There is no discussion or justification for this more restrictive change. Additionally, the discussion states that SG OPERABILITY is determined by SG tube inspections per CTS 3.4.5 and ITS 5.5.9. However, SG OPERABILITY includes other factors besides tube inspections such as water level and temperature. The discussion makes no reference to where those requirements have gone. Finally, the discussion states the change is consistent with TSTF 138. | SAME AS ABOVE | |

**CCNPP Response:**

Changes associated with TSTF-138 will be withdrawn. The ISTS Bases markup for ITS SR 3.4.13.2 will be changed to indicate that compliance with LCO 3.0.3 is required when one or more steam generators do not meet the requirements of the steam generator tube surveillance program. This deviation will be justified by JFD 13, and DOCs A.3 and A.5 will be revised. DOC M.1 will be withdrawn.

RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION
IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4

| 3.4.13 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 6 | M.1 | | The discussion states that this more restrictive change is consistent with both the STS and TSTF 138. The STS markup contains a "cloud" with the STS 3.4.13 Condition B added "OR" requirement for one or more SGs inoperable. The STS does not contain this requirement. Additionally, this change is referenced to TSTF 138. | SAME AS ABOVE | |
| **CCNPP Response:**<br>Changes associated with TSTF-138 will be withdrawn. The ISTS Bases markup for ITS SR 3.4.13.2 will be changed to indicate that compliance with LCO 3.0.3 is required when one or more steam generators do not meet the requirements of the steam generator tube surveillance program. This deviation will be justified by JFD 13, and DOCs A.3 and A.5 will be revised. DOC M.1 will be withdrawn. | | | | | |
| 7 | L.1 | | The discussion of change focuses on the deletion of CTS Surveillance Requirements in ITS 3.4.13. However, the discussion and justification do not adequately describe how performing the RCS water inventory balance required by ITS SR 3.4.13.1 effectively replaces the monitoring functions performed by the CTS Surveillance Requirements. | Are these same requirements in Leakage Detetion? | |
| **CCNPP Response:**<br>DOC L.1 will be revised to provide additional justification for these changes. | | | | | |

| 3.4.14 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 1 | | L.6 | Notes are added to ITS 3.4.14 Actions A.1 and B.1.2 that allow waiting 12 hours after steady state conditions are established before performing a RCS inventory balance. CTS 3.4.6.1 does not allow this wait. The original STS 3.4.14 version does not contain these Notes either. The STS 3.4.14 markup inserts these notes with a reference to TSTF-116. | Acceptance of this change is contingent upon NRC approval of TSTF-116. | |
| **CCNPP Response:**<br>The changes associated with TSTF-116 have been withdrawn. | | | | | |

DOC = Discussion of Change
JFD = Justification for Deviation

**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.14 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 2 | | | CTS Surveillance Requirement 4.4.6.1 a references the Frequencies specified in Table 4.3-3. There are numerous changes to Table 4.3-3 with the only change referenced to A.1. There is inadequate discussion and justification for the changes noted. | Provide discussion and justification for the indicated changes. Specifically discuss how these requirements are addressed by the ITS 3.4.14 SRs. | |
| **CCNPP Response:** References in the CTS will be enhanced, DOC LA.1 will be added, DOC L.1 will be modified, and ISTS markups will be revised. | | | | | |
| 3 | | | The CTS 3.4.6.1 markup includes a Table 3.3-6 that contains several changes. The only reference to a discussion is A.1 and to see the discussion of change for 3.3.3.1, "Radiation Monitoring Instrumentation." There is no discussion or justification for the noted changes in any of the discussion of change files for 3.4.6.1. In fact, CTS 3.4.6.1 does not reference Table 3.3-6 at all. | Provide discussion and justification for the indicated changes on Table 3.3-6. Specifically address how these changes relate to CTS 3.4.6.1 and ITS 3.4.14. | |
| **CCNPP Response:** References in the CTS will be enhanced, DOC LA.1 will be added, DOC L.1 will be modified, and ISTS markups will be revised. | | | | | |

| 3.4.15 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| No comment for 3.4.15 | | | | | |

| 3.4.16 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| | | | No comments for 3.4.16 | | |

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**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4.17 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| 1 | A.1 | | The markup for CTS Surveillance Requirement 4.10.5.2 changes the original wording of, "...prior to suspending reactor coolant circulation." to "...prior to suspending LCO 3.4.6, LCO 3.4.7, or LCO 3.4.8." This Surveillance Requirement is contained in ITS SR 3.4.17.1 which requires verifying xenon reactivity is within limits once within 1 hour prior to suspending LCO 3.4.6, LCO 3.4.7, or LCO 3.4.8. ITS 3.4.6, "RCS Loops - MODE 4," ITS 3.4.7, "RCS Loops - MODE 5, Loops Filled," and ITS 3.4.8, "RCS Loops - MODE 5, Loops Not Filled," each have notes allowing exceptions to their respective LCOs under certain conditions. Although this change is arguably an administrative change, it is not of the generic nature addressed by A.1. This change is consistent with the STS, but there is no discussion or justification for this specific element of the change. | Provide additional discussion and justification for this specific change referenced by A.1. Specifically discuss the respective requirements of ITS 3.4.6, 3.4.7, and 3.4.8 and justify how suspending them does not affect plant safety. | |
| **CCNPP Response:** The CTS markups will be revised, DOCs LA.1, LA.2, and A.2 will be retracted, and DOC A.3 will be added added to address the changes. | | | | | |
| 2 | A.2 | | CTS 3.10.5.c requires verifying the shutdown margin per the requirements of CTS 3.1.1.2, "Shutdown Margin - $T_{avg}$ < 200°F," once per eight hours when no SDC pumps or RCPs are in operation. This requirement is moved to ITS SR 3.4.17.4. However, the discussion of change references two ITS SRs (i.e., ITS SR 3.4.17.4 and 3.4.17.5) that now contain the original CTS 3.10.5.c requirements, and two Notes that amplify and modify the ITS SRs. Neither the STS 3.4.17 markup, nor ITS 3.4.17 contain SR 3.4.17.5 or the referenced Note 1. ITS SR 3.4.17.4 does have a Note that is the Note 2 referenced in the discussion of change. ITS 3.4.17 is consistent with STS 3.4.17. This change is not adequately justified in the discussion of change. | Correct the discussion of change to accurately reflect the ITS 3.4.17 contents. | |
| **CCNPP Response:** The CTS markups will be revised, DOCs LA.1, LA.2, and A.2 will be retracted, and DOC A.3 will be added added to address the changes. | | | | | |

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**ATTACHMENT (1)**

**RESPONSES TO REQUEST FOR ADDITIONAL INFORMATION**
**IMPROVED TECHNICAL SPECIFICATIONS SECTION 3.4**

| 3.4 | DOC | JFD | CHANGE/DIFFERENCE | COMMENT | STATUS |
|---|---|---|---|---|---|
| | | | PIV Leakage specification should be retained | LCO should be retained for consistency with the STS and also because there is nothing to preclude the inclusion of the LCO. | |

**CCNPP Response:**

JFD 16 will be revised to explain that the only associated specification required for this LCO is CTS SR 4.5.2.e.1, which has been retained as ITS SR 3.5.2.9, and will explain why the primary isolation valve leakage specification does not need to be retained.



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