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Vogtle Project

December 5, 1986

Director of Nuclear Reactor Regulation
Attention: Mr. B. J. Youngblood
PWR Project Directorate #4
Division of PWR Licensing A
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

File: X7N16
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NRC DOCKET NUMBER 50-424
CONSTRUCTION PERMIT NUMBER CPPR-108
VOGTLE ELECTRIC GENERATING PLANT - UNIT 1
TECHNICAL SPECIFICATIONS

Dear Mr. Denton:

Enclosed for your staff's information is a copy of our meeting notes documenting the October 20-24, 1986 Technical Specification meeting in Bethesda. These notes are being provided in response to a request from your staff.

If your staff requires any additional information, please do not hesitate to contact me.

Sincerely,

J. A. Bailey

J. A. Bailey
Project Licensing Manager

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Attachment 1

Meeting Notes

These notes reflect a page-by-page review of the Proof and Review copy. The order in which comments were discussed was dictated largely by the availability of the branch reviewers throughout the week. These notes are organized in the order in which each comment was discussed.

1. Pages 3/4 3-17 and 3-21: Our proposed revisions to Functional Unit 3b and our proposed footnote g were acceptable to the staff.

2. Page 3/4 3-25: Proposed revisions were acceptable.

3. Pages 3/4 3-32 and 3-33: Proposed revisions were acceptable.

4. Tables 3.3-2, 3.3-3 and 4.3-2: We agreed to add the ventilation radiation monitors which actuate the fuel handling building post accident ventilation system to these tables.

5. Page 3/4 3-38: Proposed revisions were acceptable.

6. Page 3/4 3-53: The staff will have to give our proposed revisions further consideration.

7. Table 3.3-3: We will have to provide radiation monitor setpoints for this table. (These setpoints were provided on November 14, 1986, GN-1184).

8. Page 3/4 9-14: We agreed to provide a specification on the fuel handling building post-accident ventilation system.

9. Tables 4.3-5 and 4.3-6: We proposed to delete the requirement for an analog channel operational test for flow rate measurement devices or monitors on the basis that these instruments do not provide alarm, trip or interlock functions. The staff found this acceptable.

10. Table 3.3-9, Action Statement 36b: The staff will have to give our proposed revision further consideration.

11. Table 4.3-5, Table Notations 1 and 2: Proposed revisions were acceptable.

12. Page 3/4 3-60: Proposed revision to 3.11.2.1.a was acceptable.

13. Pages 3/4 7-15 and 7-18: The staff took the position that surveillance requirements c.2 and d should specify 30°C as opposed to 80°C. We agreed to revise the requirements to 30°C but GPC will check to see if this causes any difficulties.

14. Pages 3/4 3-62, 3-65, 3-66, 3-67: Proposed revisions to operability requirements on samplers/monitors were acceptable.

15. Pages 3/4 6-20 and 6-21: The staff agreed to delete this specification on the basis that the FSAR will be revised so that the electrical penetration room filtration system is no longer referred to as an ESF system.

16. Page 2/4 4-28: The NRC staff stated that the definition of a gross radioactivity determination as it appears on this page states exactly what they expect to be done. Therefore, the revisions proposed by GPC were not acceptable. However, the staff did indicate that they would entertain some clarification in the bases. We proposed clarifying statements for pages B 3/4 4-7 and B 3/4 7-2 for consideration by the staff. (The proposed revisions are reflected in our November 6, 1986 submittal, GN-1166.)

17. Table 4.7-1: The staff will consider the deletion of the requirement to do a gross radioactivity determination and require only the DEI determination once per 31 days.

18. Page 3/4 7-14: Our proposed deletion of the surveillance requirement on control room air temperature at 12 hour intervals was not acceptable. We had proposed the deletion on the basis that the emergency system does not maintain control room air temperature during normal operation. In turn, we would perform surveillance on a monthly basis that would demonstrate the capability of the emergency system to maintain control room air temperature. However one of the members of the regional staff expressed concern that if control room temperature rose too high during normal operation, the emergency system might not be able to maintain temperature if called upon. GPC chose to drop the proposed revision rather than pursue an answer to this question.

19. Pages 3/4 7-15, 7-17 and 7-18: The staff would not accept our argument for an efficiency of 99.5% as opposed to 99.95% on the basis that 99.95% was "traditional."

20. Page 3/4 7-16: We must provide the correct pressurization flow rate. (This was provided in our November 14, 1986 submittal, GN-1184.)

21. Page 3/4 7-18: Item d.3 was revised to require a negative pressure of 1/4 inch relative to the outside atmosphere.

22. Page 3/4 7-14: The NRC staff will have to reconsider the applicability which appears in the Proof and Review Copy for consistency with Specification 3.3.3.7.

23. Pages 3/4 11-1 and 11-5: The staff did not accept our proposal to put Tables 4.11-1 and 4.11-2 into the FSAR. Their position was that if the tables are to be removed from the Technical Specifications, they should be relocated to the ODCM. GPC did not wish to include the tables in the ODCM and therefore the tables will remain in the Technical Specifications.

24. Pages 3/4 11-1 and 11-5: Both of these specifications include exceptions to the provisions of Specifications 3.0.3 and 3.0.4. The regional staff commented that, from the standpoint of enforceability, these exceptions should not apply since forcing a shutdown will definitely call to utility management's attention any noncompliance with these specifications. We responded that forcing plant shutdown, especially in the case of gaseous effluents, will only serve to exacerbate the situation. If the plant was found to be operating outside the limits of these specifications and appropriate action had not been taken to return to compliance with the limits, then the utility is subject to enforcement action regardless of whether or not the plant is shut down.

25. Pages 3/4 12-5, 12-6, 12-9, and 12-13: Proposed revisions were found to be acceptable.

26. Pages B 3/4 11-4 and 11-5: Proposed revisions were found to be acceptable.

27. Page B 3/4 12-1: Our proposed revisions to these pages were not accepted.

28. Tables 3.12-2 and 4.12-1: The staff questioned the limits we proposed for Zr-95, Nb-95, Ba-140, and La-140. We provided the staff with further information on the basis for our proposed limits.

29. Page 6-8, item 1: The staff questioned our proposed limits for PRB review of accidental, unplanned releases. Our proposed revision was not incorporated into the final draft. We did however provide the basis for our proposal in our November 14, 1986 transmittal GN-1184.

30. Pages 6-18 and 6-19: Proposed revisions were found to be acceptable.

31. Page 6-14: Our proposed revision was found to be acceptable but there is a mistake on page 11-2 of Supplement 3 to the SER which must be corrected. The SER reads "Containment Spray system including the NaOH subsystem" and it should read "excluding the NaOH subsystem."

32. Table 4.3-1: The staff's position is that reactor trip breaker bypass breaker testing will remain a tech. spec. requirement.

33. Page 3/4 3-50: We agreed to list all channels which are classified as Category 1 as defined in Regulatory Guide 1.97. Our proposed Action Statements were then revised to address those cases where we had more channels of instrumentation than required so the extra channels are not required to be operable by the tech. specs. The staff also took the position that containment isolation valve position indication be classified as Category 1. Our FSAR classifies containment isolation position indication as Category 2 on the basis that only single position indication is provided. This is the only deviation from Category 1 criteria. The staff found this acceptable in the SER and maintained that this instrumentation should be treated as Category 1 in the tech. specs. As a result, the final draft will reflect containment isolation valve position indication as Category 1 instrumentation.

At this point in the meeting we began a discussion of the ICSB reviewer's comments. In the subsequent notes the ICSB reviewers comments will appear followed by the disposition of the comment.

34. In Section 7.2.2.2 of the SER, a technical specification requirement for the turbine trip on reactor trip circuitry is discussed. Provide appropriate technical specification.

    Response: Turbine trip on reactor trip is accomplished by interlock P-4 which is listed in Tables 3.3-2, 3.3-3 and 4.3-2 as Functional unit 9b.

35. Proposed technical specifications include changes approved by the staff's review of WCAP-10271. The staff's letter of July 24, 1985, and the "Westinghouse Owners Group Guidelines for Preparation of Submittals Requesting Revisions to RPS Technical Specifications" related to WCAP-10271 discuss conditions upon which approval of technical specification changes is granted. Provide commitments covering programs or procedures which address common cause problems and instrument setpoint drift.

    Response: GPC agreed to provide this commitment in the meeting notes which will in turn be provided to the staff as documentation of this meeting.

    Plant Vogtle administrative procedures and engineering procedures are under revision to include the requirement of common mode failure analysis in the event that instrumentation fails the Reactor Protection System 3 months Staggered Base Surveillance Test. If a common mode failure is identified, the corrective action is included in the requirements for retesting the redundant protection channels.

    The Instrumentation and Controls Department has developed a program to trend setpoint drift. This program will apply to instruments currently under consideration by the NRC staff regarding a change in analog channel operational test frequency provided by WCAP 10271. A computer program

has been established to facilitate the trending, analysis and graphing of the associated analog channel operational test results. The loops that must be trended have been identified and a list has been forwarded to the appropriate personnel. Copies of the completed and approved analog channel operational test data sheets will be provided for periodic computer data base update. The trending results/graphs can be displayed or printed out upon request. Hard copies of the trending results/graphs will be maintained in a central file along with the copies of the approved analog channel operational test data. A procedure is currently being drafted to fully document this Setpoint Drift Trending Program.

36. On page 2-7 under NOTE 1: Correct the conflict between the equation used here and that used on page 7.2.1-5 of the FSAR.

On page 2-9 under NOTE 3: Correct the conflict between the equation used here and that used on page 7.2.1-6 of the FSAR.

Response: The FSAR is not actually in conflict with the tech specs. However, we agreed to revise the FSAR to provide clarification. (A mark-up of the FSAR pages in question was provided in our November 17, 1986 submittal, GN-1189).

37. Sections 4.3.1.2 and 4.3.2.2 refer to limits on response times. Tables covering response times have been eliminated from the technical specifications. Provide a reference to the source of response time limits in these two sections.

Response: We provided the requested reference in the bases for 3/4.3.1.2 and 3/4.3.2.2 in our November 6, 1986 submittal, GN-1166.

38. On page 3/4 3-2 under Functional Unit 5.b: Entry under "MINIMUM CHANNELS OPERABLE" has been reduced to one. Provide additional justification.

Response: The ICSB reviewer stated that if we could resolve this with the RSB reviewer then he would be satisfied. We discussed our justification provided in our February 28, 1986 submittal with the RSB reviewer and our proposed revision was found to be acceptable.

39. On pages 3/4 3-9 and 3/4 3-10: Functional Unit 18.d is missing. Renumber entries as appropriate.

Response: This discrepancy was corrected in our October 13, 1986 submittal, GN-1115.

40. On page 3/4 3-17 under Functional Unit 3.b.1: Rewrite entry around manual initiation of containment spray and isolation. Under Functional Unit 4.a.I: Correct the conflict between the logic used here and that shown in Figure 7.2.1-1 (Sheet 8) of the FSAR. Under Functional Unit 3.b.5: Entries under "MINIMUM CHANNELS OPERABLE" should be revised to encompass the redundancy provided by the design.

Response: The entry for manual initiation of containment spray and containment ventilation isolation was left as is in the Proof and Review Copy. With regard to Figure 7.2.1-1 (Sheet 8) and manual steamline isolation, we agreed to correct the FSAR figure to agree with the tech. specs. The comment about Functional Unit 3.b.5 was resolved with our proposed revision.

41. In WCAP-11269 errors are included for Veritrak pressure transmitters used in several protection channels. In light of Westinghouse's recent notification to licensees concerning possible excessive errors in these transmitters, affected channels should be identified and notes included in the technical specifications to ensure appropriate interim measures are taken.

    Responses: We agreed to the more conservative setpoints recommended by Westinghouse as interim corrective action until the problem is finally resolved.

At this point, we deferred discussion of the remainder of the ICSB reviewer's comments and moved to the RSB reviewer's concerns.

42. Engineering Safety Features Actuation System Instrumentation, Table 3.3-2 (Page 3/4 3-15): Automatic Safety Injection (high containment pressure) is not required to be operable in Mode 4 by Table 3.3-2. In a letter from J. Bailey, GPC, to H. Denton, NRC, December 9, 1985, an analysis of large break LOCA in Mode 4 was provided to the staff assuming immediate and automatic actuation of SI at the end of blowdown. Provide revisions to either the Safety Analysis or the Technical Specifications so that they are consistent. If you choose to revise the Safety Analysis the operator response time to manually actuate SI should be justified. In other reviews the staff has accepted operator response times of 10 minutes following a control room alarm.

    Response: We resolved this concern by agreeing to put operability requirements on safety injection initiation due to high containment pressure in Mode 4.

43. Reactor Trip System and Engineered Safety Features Actuation System Instrumentation (Page B 3/4 3-2)

    The bases describe the importance of response times testing for the Reactor Trip and Engineered Safety Features actuation functions. Limiting conditions for operation are not provided in the Technical Specifications for the response times or for their surveillance. Please correct this inconsistency.

Response: We resolved this item by providing a reference for response time limits in the bases as discussed with the ICSB reviewer.

44. Reactor Trip Instrumentation, Table 3.3-1 (Page 3/4 3-2): The FSAR Evaluation of inadvertent control bank withdrawal from subcritical or low power assumes reactor trip to be initiated by a high neutron flux signal from the power range channels (low setting). The Technical Specifications do not require the power range channels to be operable when the reactor is subcritical (modes 3, 4, and 5). Please correct this inconsistency. If your response is that the reactor would trip from signals generated by the source range channels. Provide the response times for this instrumentation under item 2 and demonstrate that the transient analysis in the FSAR is bounding.

Reactor Coolant System Hot Shutdown 3.4.1.3 and Cold Shutdown 3.4.4.1 and 3.4.1.4.2 (Pages 3/4 4-3 to 3/4 4-6): The FSAR evaluation for inadvertent control bank withdrawal from subcritical assumes that two reactor coolant pumps are operating. The Technical Specification do not require any reactor coolant pumps to be in operation in modes 4 and 5. If a control rod bank withdrawal transient were to occur without coolant pump flow, the minimum DNBR might be decreased below that calculated in the FSAR. Provide additional safety analyses of inadvertent control rod withdrawal transients in modes 4 and 5 without reactor coolant pump flow or demonstrate that inadvertent criticality from control rod bank withdrawal cannot occur in modes 4 and 5.

Response: Both of these concerns were resolved by a commitment to perform response times testing on the source range instrumentation and adding a statement to the bases for Section 2.0 to the effect that the source range instrumentation will be used to mitigate the consequences of an inadvertent control rod bank withdrawal in Modes 3, 4 and 5.

45. Main Steam Line Isolation Valves 3.7.1.5 (Page 3/4 7-9) and Engineered Safety Features Actuation Systems Instrumentations Table 3.3-2 (Page 3/4 3-17)

The Safety Evaluation in the FSAR for steam generator tube rupture assumes that the operator takes action to isolate the leak by closing the MSIV on the associated steam line. The Technical Specifications do not require manual isolation capability or operability of the MSIVs in Mode 3. Provide additional safety analyses of an unisolatable steam generator tube rupture accident in Mode 4 or provide Technical Specifications consistent with the current Safety Analysis.

Steam Line Atmospheric Relief Valves

The FSAR Safety Evaluation of Steam Generator Tube Rupture assumes operator action to open the atmospheric relief valves on the steam lines of the unaffected steam generators. This action is required to limit radiation release to the atmosphere if offsite power is lost. The Technical Specifications do not require operability of the atmospheric relief valves. Provide additional safety analyses of a steam generator tube rupture accident with inoperable stam line relief valves or provide Technical Specifications that are consistent with the Safety Analysis

Response: Both of these items were resolved by the fact that we are committed to a license condition which requires us to follow the recommendations resulting from interaction between the NRC staff and WOG Steam Generator Tube Rupture Subgroup.

46. Special Test Exception 3/4.10.4 Reactor Coolant Loops (Page 3/4.10.4) Power Operation in Mode 1 is permitted to the P-7 interlock setpoint which may be in excess of 10% power. The FSAR does not evaluate power operation without the reactor coolant pumps. Either provide a supporting Safety Evaluation or revise the Technical Specifications so that they are consistent with the existing safety analysis..

    Response: We will have to investigate this item and provide the staff with additional information.

47. Pages 3/4 1-7, 1-8, 1-9, 1-17, and 2-8: Our proposed revisions were found to be acceptable by the NRC staff.

48. Page 3/4 2-14: The staff accepted our proposed revision concerning the 12-hour surveillance requirement on RCS flow rate.

49. Pages 3/4 3-2 and 3-11: Proposed revisions were acceptable.

50. Page 3/4 3-41: The staff will have to give our proposed revisions further consideration.

51. Page 3/4 3-50: This spec was revised as noted in our November 6, 1986 submittal (GN-1166). The staff will have to give our proposed Action 32 further consideration.

52. Page 3/4 4-7: The staff found our proposed revision to be unacceptable on the basis that the COMS was not reviewed as a safety grade system. However the staff offered an alternative which allows the pressurizer code safeties to be inoperable in Mode 5 if an equivalent size hole is provided. GPC found this to be acceptable.

53. Page 3/4 4-10: This spec was revised as noted in our November 6, 1986 submittal (GN-1166).

54. Page 3/4 4-6: Our proposed revisions were found to be acceptable.

55. Page 3/4 5-4: Proposed revisions were acceptable provided the FSAR is revised to reflect that valves HV 8803 A&B are now effectively locked in position.

56. Pages 6-1 and 6-5, footnote * and Table 6.2-1: Our proposed revision was not accepted by the staff.

57. Figures 6.2-1 and 6.2-2: We had proposed to delete these figures on the basis that the figures were difficult to keep up-to-date on the basis that each change in organization would require a tech spec amendment. The offsite and onsite organizations are documented in Chapter 13 of the FSAR which is automatically updated each year. Duke Power successfully deleted these figures from the McGuire Tech Specs recently on this basis. However, since VEGP is an NTOL, and this is really a generic issue, we were not allowed to make the deletion.

58. Page 6-6: Our proposed revision to 6.2.3.3 was not acceptable to the staff.

59. Page 6-7: Specifications 6.4.1.2 and 6.4.1.3 were revised as noted in our November 6, 1986 submittal (GN-1166).

60. Page 6-8, item 1: We were asked to provide additional justification for our proposed revision. (This was provided in our November 14, 1986 submittal (GN-1184).)

61. Pages 6-9, 6-10, 6-13 and 6-14: These pages were revised as noted in our November 6, 1986 submittal (GN-1166).

62. Page 3/4 4-29: We agreed to put in the bases a reference to the FSAR table which will contain the specimen withdrawal schedule. (This was provided in our November 6, 1986 submittal (GN-1166).)

63. Page B 3/4 4-10: We will provide a more legible figure. (This was provided in our November 6, 1986 submittal (GN-1166).)

64. Page 3/4 3-43: The staff questioned the fact that we did not include all of our seismic instrumentation in the tech specs. They also questioned the fact that we did not require an analog channel operational test on the triaxial response spectrum analyzer. We responded to the first concern via a telecon subsequent to this meeting by reviewing R.G. 1.12 against our proposed tech specs with the reviewer. He agreed with our proposed list of instrumentation with the exception that we should include the instrument at auxiliary building floor elevation 220. We agreed and provided a marked-up table in our November 6, 1986 submittal (GN-1166).

    The second question was resolved by explaining to the reviewer that the response spectrum analyzer was not an on-line device at VEGP. The operator has to physically remove recorded data from the seismic instrumentation and insert the tapes into the analyzer for processing. Therefore, the analog channel operational test is not applicable.

65. Page 3/4 3-42: The staff will have to give our proposed revision further consideration.

66. Page 3/4 6-9: The reviewer will have to review our justifications for proposed revisions to items a and d.

67. Page 3/4 4-21: The staff will have to give our proposed revision further consideration.

68. Pages 3/4 7-19, 7-20 and B 3/4 7-5: The staff informed us that the STS were in error by correlating snubber failures on a system by system basis. They have found that the majority of snubber failures cannot be related to the system on which they are installed. Therefore, the final draft of the VEGP Unit 1 tech specs will be revised accordingly.

69. Page 3/4 4-15: Our proposed revision which would have allowed sleeving faulty steam generator tubes was unacceptable in the absence of an analysis providing a plugging limit for the sleeved tubes. The 40% plugging limit is not applicable to sleeved tubes.

70. Page 3/4 4-17: Our proposed revision was deemed appropriate.

71. Page 3/4 4-18: According to the staff the Code of Federal Regulations states that steam generator tubes which fall into Category C-3 constitute a condition which requires prompt notification. Therefore our proposed revision to this table was unacceptable.

72. Page 3/4 4-14: The addition of the words "Condition IV" was unacceptable to the staff.

73. Page 3/4 4-36: The staff requested that we clarify the wording found in 4.4.10.2. Our November 6, 1986 submittal reflects the revised wording.

74. Page 3/4 6-2: The staff stated that ANSI N 45.4-1972 is required by the Code of Federal Regulations. However, in our FSAR we are committed to ANSI N 56.8-1981. GPC will have to check this in order to ensure compliance with the law.

75. Page 3/4 6-6: The staff questioned our limits on containment pressure and we referred to sections 6.2.1.1.1 and 6.2.1.1.3 of the SER which indicates the acceptability of these limits.

76. Page 3/4 8-1: This page was revised as noted in our November 6, 1986 submittal. Footnote # was added to address a concern expressed by the reviewer arising from a TDI program requirement.

77. Page 3/4 8-3: We agreed to clarify the FSAR concerning diesel-generator start times.

78. Page 3/4 8-4: This page was revised as noted in our November 6, 1986 submittal. One of the commenters from the regional staff called to our attention a letter to J. Nelson Grace concerning some additional fuel oil testing for inorganic zinc contamination. During the ensuring discussion it became clear that tech specs were not the only issue since NRR made the statement that additional testing may not resolve the question of inorganic zinc contamination. This issue will have to be resolved in the realm of the FSAR and any questions concerning tech specs will have to be deferred until such resolution is achieved.

79. Page 3/4 8-6: Proposed revision were found to be acceptable.

At this point in the meeting we returned to the ICSB reviewers concerns.

80. On page 3/4 3-51 under Instrument 14: Expand entries to include wide range and narrow range instruments following the plants' R.G. 1.97 Type A designation for these instruments as discussed in the staff's SER.

    Response: This entry was revised appropriately.

81. In Table 3.3-8: Add appropriate entries for containment isolation valve positions following the plant's R.G. 1.97 categorization of this instrumentation as Category 1.

    Response: The VEGP FSAR states that containment isolation valve position indication is a Category 2 parameter. The position indication meets the intent of Category 1 requirements with the exception of redundant indication. We subsequently agreed to add this parameter to the table in the tech specs.

82. On page 3/4 3-18 under Functional Unit 5: Provide appropriate entries for feedwater isolation on low Tavg coincident with P-4 as shown in Figure 7.2.1-1 (Sheet 13) of the FSAR.

    Response: The feedwater isolation on low Tavg coincident with reactor trip is not assumed in any of the Vogtle FSAR Chapter 15 non-LOCA safety analyses. It is considered to be a diverse means of isolating main feedwater. It should be noted that this function was assumed in the Vogtle superheat steamline breaks (outside containment) mass/energy analysis to conservatively provide the earliest feedwater isolation signal available during the transient. However, because this modeling assumption is used to increase the severity of the transient, it is not considered necessary for reactor protection and is not considered necessary for inclusion in the Vogtle tech specs.

    The staff, however, insisted that the final draft include this functional unit.

83. On page 3/4 3-26 under Functional Unit 4.e: Entries under "TRIP SETPOINT" and "ALLOWABLE VALUE" should be positive following the guidance of the Westinghouse STS.

    Response: The Proof and Review Copy was corrected appropriately.

84. On page 3/4 3-30 under "TABLE NOTATIONS:" Verify correctness of "_" for T_2 in note *.

    Response: The Proof and Review Copy was corrected appropriately.

85. On page 3/4 5-2 under Section 4.5.1.2: Required surveillance deviates from the Westinghouse STS. Provide justification.

    Response: The final draft will include the requirement to perform an analog channel operational test on the accumulator level and pressure channels once per 31 days. We argued that it is more appropriate to verify accumulator level and pressure by checking the actual values using control board instrumentation rather than relying on the alarms. The reviewer agreed with our position but stated that our proposed revision was generic and could not be granted for VEGP at this time.

86. In Tables 2.2-1 and 3.3-3: Correct entries under "TRIP SETPOINT" and "ALLOWABLE VALUE" to agree with those provided in WCAP-11269, "Westinghouse Setpoint Methodology For Protection Systems Vogtle Station."

    Response: This was resolved by our October 13, 1986 submittal (GN-1115).

87. On page B 3/4 3-3: Correct the discussion provided under "P-11" to agree with that provided in Table 7.3.1-3 of the FSAR.

    Response: The bases were reworded as noted in our November 6 submittal.

88. On page 3/4 3-20 under Functional Unit 10: Provide appropriate entries for control room isolation on high chlorine input as shown in Figure 7.2.1-1 (Sheet 8) of the FSAR. Entry under "ACTION" deviates from Westinghouse STS. Provide justification.

89. On page 3/4 3-16 under Functional Unit 3.a.4: Entry under "ACTION" deviates from Westinghouse STS. Provide justification.

    Response: This item was resolved by discussion at the meeting. No revision of the Proof and Review Copy was required.

90. On pages 3/4 3-17 and 3/4 3-18 under Functional Unit 4: Reference to footnote f deviates from Westinghouse STS. Provide justification.

    Response: This item was resolved by discussion at the meeting.

91. In Tables 3.3-2, 3.3-3, and 4.3-2: Add instrumentation for all other ESFAS functions, such as control building ESF electrical equipment rooms HVAC, that are not included in other sections of the technical specifications.

    Response: This item was resolved by discussion at the meeting.

92. On page 3/4 3-19 under Functional Unit 6: Provide appropriate entries for auxiliary feedwater pump suction transfer following the guidance of the Westinghouse STS.

    Response: VEGP is not equipped with this feature.

93. Controlled Leakage: At this point in the meeting, we participated in a conference call between Westinghouse and the NRC staff during which Westinghouse explained the justification for our proposed revision to this specification. The staff asked about the intent of this specification and Westinghouse responded that the intent was to ensure proper ECCS flow by limiting flow to the seals. The intent is not to detect excessive seal leakage at the reactor coolant pumps. The staff was also concerned about maintaining seal injection throttle valve position. These valves are enclosed within protective covers which are locked under administrative control. Thus positive protection is afforded to prevent inadvertent movement of the valves. At this point the reviewers had no further questions and agreed that our proposed revision would be acceptable.

94. Pages 3/4 3-42 and 3-44: The staff will have to give our proposed revision further consideration.

95. Page 3/4 6-9: This page will require further consideration by the staff.

96. Page 3/4 0-2: The staff would not accept our proposed revision to this specification. GPC stated that they wished to pursue this item further with the staff.

97. Page 3/4 4-21: The staff could not accept our proposed revision since the following criteria are not met except for the RHR suction isolation valves.

    1. Full closure of pressure isolation valves indicated in control room.

    2. Interlocks to prevent opening when RCS pressure is above low pressure system design pressure.

    3. High pressure alarms.

98. Page 3/4 8-11: This page was revised as noted in our November 6, 1986 submittal in response to a comment from the regional staff.

99. Page 3/4 8-12: Our proposed revisions were accepted. We will have to revise the FSAR to be consistent with the tech specs.

100. Page 3/4 8-13: We need to verify that the allowable value for float voltage for each connected cell (2.10 volts) will be sufficient to maintain the battery in the fully charged condition. (We provided this in our November 14, 1986 submittal - GN-1184.)

101. Pages 3/4 8-15 and 8-16: We agreed to reinstate the STS version of footnote * in response to concerns expressed by the reviewer.

102. Page 3/4 8-18: The reviewers comments were resolved by discussion at the meeting.

103. Pages 3/4 8-19 and 8-20: The reviewers comments were resolved as noted in our November 6, 1986 submittal. We agreed to add a reference to the table of overcurrent protective devices to the bases. This was provided in our November 6, 1986 submittal.

104. Page 3/4 8-21: The reviewer was not willing to allow Table 3.8-2 to be deleted from the tech specs and removed to the FSAR. We agreed to replace the table in the tech specs. We also resolved the reviewers concern about the deletion of the surveillance requiring calibration of the thermal overload protection devices.

105. Page 3/4 3-19: The reviewer accepted our proposal to replace Action 19 with Action 23 as applied to Functional Unit 6e. Also, our proposed action 28 applied to Functional Unit 6f was acceptable.

106. Page 3/4 6-4: This page was revised as noted in our November 6, 1986 submittal.

107. Page 3/4 6-11: This page was revised as noted in our November 6, 1986 submittal.

108. Page 3/4 6-15: Our proposed revision was found to be acceptable.

109. Page 3/4 6-16: This page was revised as noted in our November 6, 1986 submittal and a reference to the containment isolation valve table was added to the bases.

110. Page 3/4 7-9: This page was revised as noted in our November 6, 1986 submittal. The allowed outage times will have to appear as "laters" until the staff reviews our PRA justifying our proposed allowed outage times.

111. Page 3/4 7-13: This specification was revised as noted in our November 6, 1986 submittal.

112. Page 3/4 4-37: We will have to address the two control valves in the head vent flow paths. Are these valves required to function in order for the head vents to be operable?

113. Page 3/4 3-70: The final draft will contain surveillance requirements similar to those which appear in the Hope Creek Tech Specs rather than a reference to our Turbine Overspeed Protection Reliability Program. We will discuss this further with the staff.

114. Page 3/4 8-4: The staff stated that the frequency at which accumulated water is checked for and removed from the diesel fuel oil tanks should be 31 days instead of 92 days regardless of where the fuel oil tanks are in relation to the water table. This is part of the McGuire diesel fuel oil surveillance package.

115. Page 6-15: Our proposed revisions were accepted.

116. Page 3/4 6-14: Our proposed revision was accepted but we have to provide the eductor flow rates as soon as possible.

117. Page 3/4 3-21: Action 18 was revised as noted in our November 6, 1986 submittal.

118. Page 3/4 6-1: The reviewer questioned our revision concerning the blind flange on the fuel transfer canal. They will consider this further.

119. Page 3/4 6-15: We have to provide additional information concerning the equivalence of the heat removal capacity of the containment spray system and the containment fan coolers. Are two trains of spray equivalent to the fan coolers? If not, we will have to revise the action statements appropriately.

The following paragraphs contain the resolution of the remaining concerns of the ICSB reviewer.

120. One page4 3/4 7-12 under Section 4.7.4.b: Since the nuclear service cooling water system pumps start is initiated automatically by more signals than just safety injection and surveillance requirements for the instrumentation for those other signals are not now included under Table 4.3-2, include appropriate surveillance requirements or, as stated above, include the instrumentation under Tables 3.3-2, 3.3-3, and 4.3-2.

On page 3/4 7-11 under Section 4.7.9.b: Since the component cooling water system pumps start is initiated automatically by more signals than just safety injection and surveillance requirements for the instrumentation for those other signals are not now included under Table 4.3-2, include appropriate surveillance requirements or, as stated above, include the instrumentation under Tables 3.3-2, 3.3-3, and 4.3-2.

Response: The above concerns are addressed by response time testing and the loss of offsite power test performed pursuant to diesel generator surveillance requirements.

121. In Table 4.3-2: Entries under "SLAVE RELAY TEST" should be changed to "M" in lieu of "Q" per Section 7.3.3.3 of the staff's SER. Also, the additional relief provided by Enclosure 3 to the staff's July 24, 1985 letter related to WCAP-10271 should be considered.

    Response: We addressed the item pertaining to slave relay testing in our August 27, 1986 submittal (GN 1064). We feel that we have taken full advantage of the relief provided by Enclosure 3 to the staff's July 24, 1985 letter related to WCAP 10271.

122. In Table 3.3-4: Cross-references to other tables should be corrected.

    Response: We resolved this in our October 13, 1986 submittal (GN-1115).

123. On page 3/4 3-49: Delete "[Illustrational Only]" and verify that all appropriate entries have been included in these tables.

    Response: The staff accepted our proposed revision to this specification. They did state however that they felt that auxiliary feedwater flow and steam generator pressure should be added to the table of remote shutdown instrumentation. We need to justify our position that our proposed table contains the necessary instrumentation.

124. On page 3/4 3-68 under "ACTION": Clarify "less than required" if this is intended to refer to "Minimum Channels Operable."

    Response: This was resolved as noted in our November 6, 1986 submittal.

125. On page 3/4 6-21 under Section 4.6.6.d.2: Since the electrical penetration room exhaust air cleanup system is initiated automatically by more signals than just safety injection and surveillance requirements for the instrumentation for those other signals are not now included under Table 4.3-2, include appropriate surveillance requirements or, s stated above, include the instrumentation under Tables 3.3-2, 3.3-3, and 4.3-2.

    Response: This item was resolved by the fact that we are revising the FSAR such that the electrical penetration room exhaust air cleanup system will no longer be referred to as an "ESF" system. Therefore since no credit is taken for the operation of this system, it will not appear in the tech specs.

126. On pages 3/4 7-15 and 7-16: Entries under Section 4.7.6.e.2 and Section 4.7.6.a.5 appear to be duplicate. Verify that separate entries are required.

    Response: This was resolved by discussion at the meeting.

127. On page 3/4 7-29 under Section 4.7.11.b and c: Since the ESF room cooler system is initiated by more signals than just safety injection and surveillance requirements for the instrumentation for those other signals are not now included under Table 4.3-2, include appropriate surveillance requirements or, as stated above, include the instrumentation under Tables 3.3-2, 3.3-3, and 4.3-2.

Response: This item was resolved by discussion at the meeting.

128. In Table 3.3-11 under "Electric Steam Boiler Isolation": Correct the conflict between the entries under "Instrument Channel" and Figure 7.6.6-6 of the FSAR.

Response: The FSAR will be revised to resolve the conflict.

129. On page B 3/4 3-1: Include the second paragraph a reference to the staff's February 21, 1985, SER on WCAP-10271. Also in the fourth line from the bottom insert a "+" in the equation.

Response: The appropriate revisions were made to the bases.

130. On page 3/4 3-12 under "TABLE NOTATIONS": Note 11 should be made consistent with corresponding note 12 of Generic Letter 85-09 to require independent testing of the undervoltage and shunt trip attachments of the reactor trip breakers for each train every 62 days on a staggered test basis.

Response: The final draft will be revised so the STS are consistent with Generic Letter 85-09.

131. In Section 6.7: Add programmatic requirements for surveillance and controls for restoration of inoperable instruments for all plant post-accident monitoring instrumentation that are classified Category 2 or 3 per R.G. 1.97 following the guidance provided in an October 12, 1983, memo from Roger J. Mattson to Darrell G. Eisenhut covering technical specifications for post-accident monitoring instrumentation.

Response: We will have to discuss this further with the staff. The final draft will be revised to include these requirements.

132. Specification 4.0.3: the staff will consider deleting the sentence from the baSes which states that action statements re entered when the surveillance requirements should have been performed rather than at the time of discovery.

133. Page 3/4 3-41: Proposed revision was found to be acceptable.

134. Pages 3/4 5-1, 5-4 and 5-6: Proposed revisions were found to be acceptable.

135. Page 3/4 9-1: Proposed revisions were found to be acceptable.

136. Specification 3.7.1.1: Our proposed revision was not acceptable in the absence of a safety evaluation by Westinghouse.

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ATTACHMENT 2

MEETING HANDOUTS