

Enclosure 1 to
ULNRC-06651

Summary of Changes to Enclosure 2,
"License Amendment Request," and
Enclosure 3, "Callaway Methodology for a
Risk-Informed Approach to Address Generic
Letter 2004-02," of ULNRC-06526

(2 pages)

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Section / Step Number	Description
Enclosure 2, Attachments 2-2, 2-3, 2-4, and 2-5	Markups of licensing documents have now been provided on current Technical Specifications (TS), TS Bases, or Final Safety Analysis Report (FSAR) pages, as applicable, and the clean TS pages have been reformatted to show header and footer information consistent with the format of the current TS. The revised markups also include punctuation, capitalization, section numbering, acronym usage, and other grammatical changes for consistency.
Enclosure 2, Attachment 2-3, TS Bases 3.6.8, LCO, first paragraph, second sentence and SURVEILLANCE REQUIREMENTS, second paragraph	Changed the description of "containment sump" to read "A containment sump consists of the in-containment ECCS and CSS recirculation flow paths (including debris Interceptors, trash racks, and curbs), the containment sump strainer, and the inlets to the ECCS and CSS piping."
Enclosure 2, Attachment 2-5, Table 1.6-2	Added "15.6.5.5" as an additional FSAR Section Reference for WCAP-16406-P-A and WCAP-17788-P.
Enclosure 2, Attachment 2-5, Section 6.3A.1.2.1, Step 2, first bullet	The PWROG / vendor proprietary threshold value for fiber deposited in fuel channels for a hot-leg break has been replaced with a reference to "the threshold value from Section 6.5.5.10.c of WCAP 17788-P, Volume 1, Rev. 0."
Enclosure 2, Attachment 2-5, Section 6.3A.1.2.3	Removed the unnecessary qualifiers "arguably" and "in a licensing context" from the bulleted items following the sentence "The evaluation demonstrates sufficient safety margin, as summarized below."
Enclosure 2, Attachment 2-5, Section 6.3A.2	Reworded the introductory paragraph to read "This section describes those methodologies or elements of the methodologies used in support of the RoverD approach for addressing sump debris concerns such that changes to the identified methodologies or elements may involve additional regulatory requirements for NRC approval or notification."

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Enclosure 2, Attachment 2-5, Section 6.3A.2.1	Reworded the introductory paragraph to read "Changes to any of the key methodologies (including acceptance criteria) used in the RoverD approach for addressing GSI-191/GL 2004-02 concerns, as described in Section 6.3A.1 of this Appendix, are to be evaluated as a potential 'departure from a method of evaluation described in the FSAR (as updated) used in establishing the design bases or in the safety analyses,' consistent with 10 CFR 50.59(c)(2)(viii) (notwithstanding the fact that some of the methodologies are risk-informed or involve risk-informed elements)."
Enclosure 2, Attachment 2-5, Section 6.3A.2.3	Removed the final sentence "Conditions that cause emergency sump strainers to be inoperable must exceed the RG 1.174 Risk Region II – low risk threshold."
Enclosure 2, Attachment 2-5, Section 6.3A.3	Changed Reference 1 to be the pending requested License Amendment, and References 2 and 3 to match FSAR Table 1.6-2.
Enclosure 2, Attachment 2-5, Sections 15.6.5.5 and 15.6.7	Added NUREG-1829, WCAP-16406-P-A, and WCAP-17788-P as References 27, 28, and 29, respectively in FSAR 15.6.5.5 and in the FSAR 15.6.7 listing of References.
Enclosure 3, Attachment 3-2, Section 3.n, Heading <u>Core-Fiber Accumulation Histories</u> , first paragraph, first sentence and second paragraph, first sentence	A footnote was added to clarify that the recommended early blockage fiber limit is not proprietary, based on its inclusion in WCAP-17788-NP, Rev. 1.
Enclosure 3, Attachment 3-2, Section 3.n, Heading <u>Core-Fiber Accumulation Histories</u> , first paragraph, fourth sentence	The PWROG / vendor proprietary threshold value for fiber deposited in fuel channels for a hot-leg break has been replaced with a reference to "the WCAP-17788-P (Volume 1, Section 6.5.5.10.c) recommended limit."