

**Advanced Passive 1000 (AP1000)
Generic Technical Specification Traveler (GTST)**

Title: Changes Related to LCO 3.6.7, Passive Containment Cooling System (PCS) - Shutdown

I. Technical Specifications Task Force (TSTF) Travelers, Approved Since Revision 2 of STS NUREG-1431, and Used to Develop this GTST

TSTF Number and Title:

None

STS NUREGs Affected:

None

NRC Approval Date:

None

TSTF Classification:

None

II. Reference Combined License (RCOL) Standard Departures (Std. Dep.), RCOL COL Items, and RCOL Plant-Specific Technical Specifications (PTS) Changes Used to Develop this GTST

RCOL Std. Dep. Number and Title:

None

RCOL COL Item Number and Title:

None

RCOL PTS Change Number and Title:

VEGP LAR DOC A086: TS 3.6.6 Required Action B.1 revision
VEGP LAR DOC A087: TS 3.6.6 Condition C revision
VEGP LAR DOC M13: Combined TS 3.6.6 and TS 3.6.7
VEGP LAR DOC D06: TS 3.6.6 LCO statement revision
VEGP LAR DOC L14: TS 3.6.6 Applicability statement revision

III. Comments on Relations Among TSTFs, RCOL Std. Dep., RCOL COL Items, and RCOL PTS Changes

This section discusses the considered changes that are: (1) applicable to operating reactor designs, but not to the AP1000 design; (2) already incorporated in the GTS; or (3) superseded by another change.

VEGP LAR DOC M13 revises TS 3.6.6 to incorporate TS 3.6.7 and deletes the GTS 3.6.7. Changes applicable to TS 3.6.7 are incorporated into TS 3.6.6. Changes VEGP LAR DOC A086, VEGP LAR DOC A087, and VEGP LAR DOC D06 are applicable to both TS 3.6.7 and TS 3.6.6. Change VEGP LAR DOC L14 is applicable to TS 3.6.7 and is incorporated into TS 3.6.6 as part of change VEGP LAR DOC M13. Due to the change described above, GTS 3.6.8, GTS TS 3.6.9, and GTS TS 3.6.10 are renumbered as TS 3.6.7, TS 3.6.8, and TS 3.6.9, respectively.

IV. **Additional Changes Proposed as Part of this GTST (modifications proposed by NRC staff and/or clear editorial changes or deviations identified by preparer of GTST)**

None

V. Applicability

Affected Generic Technical Specifications and Bases:

Section 3.6.7, Passive Containment Cooling System (PCS) - Shutdown

Changes to the Generic Technical Specifications and Bases:

TS 3.6.7 is deleted and incorporated into TS 3.6.6. (DOC M13)

VI. Traveler Information

Description of TSTF changes:

None

Rationale for TSTF changes:

None

Description of changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:

VEGP LAR DOC M13 revises TS 3.6.6 to incorporate TS 3.6.7 and deletes TS 3.6.7. The Applicability for TS 3.6.6 is revised to include a new Applicability of "MODES 5 and 6 with the reactor decay heat > 6.0 MWt." TS 3.6.6 Condition D, first Condition, is revised to include the phrases "of Condition A, B, or C," and "in MODE 1, 2, 3, or 4." TS 3.6.6 Condition D, second Condition, is revised to include the phrase "in MODE 1, 2, 3, or 4." TS 3.6.6 Actions E and F are added.

Rationale for changes in RCOL Std. Dep., RCOL COL Item(s), and RCOL PTS Changes:

VEGP LAR DOC M13 change to incorporate TS 3.6.7 into TS 3.6.6 results in a more restrictive TS since it eliminates the separate restoration times when in Mode 5 or 6. Also, TS 3.6.6 and TS 3.6.7 have identical LCO statements.

Description of additional changes proposed by NRC staff/preparer of GTST:

None

Rationale for additional changes proposed by NRC staff/preparer of GTST:

None

VII. GTST Safety Evaluation**Technical Analysis:**

VEGP LAR DOC M13: GTS 3.6.6, Passive Containment Cooling System (PCS) - Operating and GTS 3.6.7, Passive Containment Cooling System (PCS) - Shutdown have the identical LCO statements. Thus, the two Specifications are combined into a single Specification. For Shutdown the "Applicability" statement is revised to include MODES 5 and 6 with the reactor decay heat > 6.0 MWt. GTS 3.6.7 Actions A, B, and C are identical to GTS 3.6.6 Actions A, B, and C. GTS 3.6.6 Condition D, is revised to specify the applicable Conditions and Modes by including the phrases "of Condition A, B, or C," and "in MODE 1, 2, 3, or 4." TS 3.6.6 Condition D, second Condition, is revised to specify the applicable Modes by including the phrase "in MODE 1, 2, 3, or 4." Action D of GTS 3.6.7 is separated into two individual Actions E and F in TS 3.6.6. The Surveillance Requirements for GTS 3.6.7 refers to the GTS 3.6.6 SRs as being applicable. Combining the GTS 3.6.6 and GTS 3.6.7 into a single new TS 3.6.6 is more restrictive due to the elimination of the separate restoration times when in Mode 5 or 6. This potential reduction in restoration time is acceptable, since the Passive Containment Cooling System has already been inoperable for at least 72 hours prior to entering Mode 5.

References to Previous NRC Safety Evaluation Reports (SERs):

None

VIII. Review Information

Evaluator Comments:

The AP1000 GTS 3.6.7 is for Passive Containment Cooling System (PCS) - Shutdown and is APPLICABLE in MODES 5 and 6 with the calculated reactor decay heat > 6.0 MWt. There is no equivalent Specifications in NUREG-1430 or NUREG-1431.

The AP1000 GTS 3.6.7 Passive Containment Cooling System (PCS) - Shutdown, and associated basis are shown in the Westinghouse AP1000 Design Control Documents [ML11171A382 and ML11171A381]

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Review Information:

Availability for public review and comment on Revision 0 of this traveler approved by NRC staff on 5/23/2014.

APOG Comments (Ref. 6) and Resolutions:

1. (Internal #6) The GTST sections often repeat VEGP LAR DOCs, which reference “existing” and “current” requirements. The inclusion in the GTST of references to “existing” and “current,” are not always valid in the context of the GTS. Each occurrence of “existing” and “current” should be revised to be clear and specific to GTS, MTS, or VEGP COL TS (or other), as appropriate. This is resolved by making the APOG recommended changes to the GTST.

NRC Final Approval Date: 5/12/2015

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IX. Evaluator Comments for Consideration in Finalizing Technical Specifications and Bases

None

X. References Used in GTST

1. AP1000 DCD, Revision 19, Section 16, "Technical Specifications," June 2011 (ML11171A500).
2. Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Technical Specifications Upgrade License Amendment Request, February 24, 2011 (ML12065A057).
3. Southern Nuclear Operating Company, Vogtle Electric Generating Plant, Units 3 and 4, Response to Request for Additional Information Letter No. 01 Related to License Amendment Request LAR-12-002, ND-12-2015, October 04, 2012 (ML12286A363 and ML12286A360).
4. TSTF-GG-05-01, "Writer's Guide for Plant-Specific Improved Technical Specifications," June 2005 (ML070660229).
5. NRC Safety Evaluation (SE) for Amendment No. 13 to Combined License (COL) No. NPF-91 for Vogtle Electric Generating Plant (VEGP) Unit 3, and Amendment No. 13 to COL No. NPF-92 for VEGP Unit 4, September 9, 2013, ADAMS Package Accession No. ML13238A337, which contains:

ML13238A355	Cover Letter - Issuance of License Amendment No. 13 for Vogtle Units 3 and 4 (LAR 12-002).
ML13238A359	Enclosure 1 - Amendment No. 13 to COL No. NPF-91
ML13239A256	Enclosure 2 - Amendment No. 13 to COL No. NPF-92
ML13239A284	Enclosure 3 - Revised plant-specific TS pages (Attachment to Amendment No. 13)
ML13239A287	Enclosure 4 - Safety Evaluation (SE), and Attachment 1 - Acronyms
ML13239A288	SE Attachment 2 - Table A - Administrative Changes
ML13239A319	SE Attachment 3 - Table M - More Restrictive Changes
ML13239A333	SE Attachment 4 - Table R - Relocated Specifications
ML13239A331	SE Attachment 5 - Table D - Detail Removed Changes
ML13239A316	SE Attachment 6 - Table L - Less Restrictive Changes

The following documents were subsequently issued to correct an administrative error in Enclosure 3:

ML13277A616	Letter - Correction To The Attachment (Replacement Pages) - Vogtle Electric Generating Plant Units 3 and 4-Issuance of Amendment Re: Technical Specifications Upgrade (LAR 12-002) (TAC No. RP9402)
ML13277A637	Enclosure 3 - Revised plant-specific TS pages (Attachment to Amendment No. 13) (corrected)

6. APOG-2014-008, APOG (AP1000 Utilities) Comments on AP1000 Standardized Technical Specifications (STS) Generic Technical Specification Travelers (GTSTs), Docket ID NRC-2014-0147, September 22, 2014 (ML 14265A493).