Mr. James Knubel
Chief Nuclear Officer
Power Authority of the State of
New York
123 Main Street
White Plains, NY 10601

December 10, 1999

SUBJECT: JAMES A. FITZPATRICK NUCLEAR POWER PLANT: REQUEST FOR ADDITIONAL INFORMATION REGARDING SECTIONS 1.0, 3.0, 3.3.5, 3.3.6,3.3.8. 3.3.9, 3.4, 3.6, 3.8, 3.9, AND 5.0 OF THE IMPROVED TECHNICAL SPECIFICATIONS (TAC NO. MA5049)

Dear Mr. Knubel:

The NRC staff is reviewing your application for license amendment dated March 31, 1999, as supplemented by letters dated May 20, June 1, July 14, and October 14, 1999, to change the format and content of the Current Technical Specifications (TSs) for the James A. FitzPatrick Nuclear Power Plant (FitzPatrick) to be generally consistent with NUREG-1433, Revision 1, "Standard Technical Specifications for General Electric Plants, BWR/4, Revision I, dated April 1995, and extend surveillance requirements from 18 months to 24 months.

On the basis of our review of the changes proposed for Improved TS (ITS) Sections 1.0, 3.0, 3.5, 3.3.6, 3.3.8, 3.3.9, 3.4, 3.6, 3.8, 3.9 and 5.0, we find that additional information identified in the Enclosure is needed.

We have discussed this with your staff and it was agreeable to your staff to respond to this request for additional information and comments within 60 days from receipt of this letter.

If you have questions regarding this letter or are unable to meet this response schedule, please contact me by phone on (301) 415-1441 or by electronic mail at gsv@nrc.gov.

Sincerely,

Original signed by:

Guy S. Vissing, Sr. Project Manager, Section 1
Project Directorate I
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-333

Enclosure: Request for Additional Information

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 10, 1999

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123 Main Street
White Plains, NY 10601

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James A. FitzPatrick Nuclear Power Plant

Mr. Gerald C. Goldstein
Assistant General Counsel
Power Authority of the State
of New York
1633 Broadway
New York, NY 10019

Resident Inspector's Office
U. S. Nuclear Regulatory Commission
P.O. Box 136
Lycoming, NY 13093

Mr. Harry P. Salmon, Jr.
Vice President - Engineering
Power Authority of the State
of New York
123 Main Street
White Plains, NY 10601

Ms. Charlene D. Faison
Director Nuclear Licensing
Power Authority of the State
of New York
123 Main Street
White Plains, NY 10601

Supervisor
Town of Scriba
Route 8, Box 382
Oswego, NY 13126

Mr. Eugene W. Zeltmann
President and Chief Operating
Officer
Power Authority of the State
of New York
30 South Pearl Street
Albany, NY 12207-3425

Charles Donaldson, Esquire
Assistant Attorney General
New York Department of Law
120 Broadway
New York, NY 10271

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. F. William Valentino, President
New York State Energy, Research,
and Development Authority
Corporate Plaza West
286 Washington Avenue Extension
Albany, NY 12203-6399

Mr. Richard L. Patch, Director
Quality Assurance
Power Authority of the State
of New York
123 Main Street
White Plains, NY 10601

Mr. Gerard Goering
28112 Bayview Drive
Red Wing, MN 55066

Mr. James Gagliardo
Safety Review Committee
708 Castlewood Avenue
Arlington, TX 76012

Mr. Arthur Zaremba, Licensing Manager
James A. FitzPatrick Nuclear
Power Plant
P.O. Box 41
Lycoming, NY 13093

Mr. Paul Eddy
New York State Dept. of
Public Service
3 Empire State Plaza, 10th Floor
Albany, NY 12223

Michael J. Colomb
Site Executive Officer
James A. FitzPatrick Nuclear Power Plant
P.O. Box 41
Lycoming, NY 13093

Mr. Eric Beckjord
2909 29th St. NW
Washington, DC 20008-3416

Mr. James Knubel
Chief Nuclear Officer
Power Authority of the State of New York
123 Main Street
White Plains, NY 10601

REQUEST FOR ADDITIONAL INFORMATION AND COMMENTS REGARDING THE STAFF REVIEW OF THE FITZPATRICK PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

SECTION 1.0, USE AND APPLICATION

1.0-01 CTS 1.0, U. Thermal Parameters, 1. Minimum critical power ratio (MCPR), and 2. Fraction of Limiting Power Density

There is no DOC which discusses the changes made to these definitions.

Comment: Provide a proper DOC for these changes.

JAFNPP Response:

1.0-02 CTS 1.0 Radiological Effluent Technical Specifications, A. Dose Equivalent I-131

There is no DOC which discusses the changes made to this definitions.

Comment: Provide a proper DOC for these changes.

JAFNPP Response:

1.0-03 ITS 1.1, Emergency Core Cooling System (ECCS) Response Time
JFD CLB1

The licensee proposes not to adopt the definition of ECCS Response Time. The justification provided in JFD is not adequate. Specifically, a previously approved TS change by using the BWR Owners Group Topical Report, NEDO-32291, "System Analyses for Elimination of Selected Response Time Testing Requirements," dated January 1994, is required for this deviation from the ITS. If the licensee has already submitted plant specific request for TS changes based upon this Topical Report, revise and provide detailed information in JFD supporting this change.

Comment: Revise JFD to address whether the Topical Report was adopted. If not, this definition should be retained in the ITS.

JAFNPP Response:

1.0-04 ITS 1.1, Isolation System Response Time
JFD CLB2

The licensee proposes not to adopt the definition of Isolation System Response Time. The justification provided in JFD is not adequate. Specifically, a previously approved TS change by using the BWR Owners Group Topical Report, NEDO-32291, "System Analyses for Elimination of Selected Response Time Testing Requirements," dated January 1994, is required for this deviation from the ITS. If the licensee has already submitted plant specific request for TS changes based upon this Topical Report, revise and provide detailed information in JFD supporting this change.

Comment: Revise JFD to address whether the Topical Report was adopted. If not, this definition should be retained in the ITS.

JAFNPP Response:

SECTION 3.0 LCO AND SR APPLICABILITY

ITS 3.0-1 changed to allow 9 hour Completion Time to be in Mode 2.

JD-X2 states that due to JAFNPP operating limitations, imposed by a restrictive exclusion zone as a result of thermal-hydraulic stability option 1D, the requirement to be in MODE 2 within 7 hours is revised to MODE 2 within 9 hours. The CTS 3.0.C (M1) Completion Time of 9 hours is consistent with current operating practice established in CTS Table 3.1-1Note 3.B, to reduce power and place the Mode switch in the startup position within 8 hours.

Comment: Provide more detailed plant specific information to justify this change.

JAFNPP Response:

Section 4,0 Design Features

4.0-1

ITS 4.3.2 Drainage is a new Technical Specification identifying the elevation, for the minimum water level, to prevent inadvertent draining from the spent fuel storage pool.

DOC-M3 states that CTS5.0 is being supplemented. ITS 4.3.2, Drainage- The proposed minimum design elevation to prevent inadvertent draining is 367 feet 3 inches.

Comment: Provide plant specific data to demonstrate how the minimum design elevation is derived.

JAFNPP Response:

SECTION 3.3.5 THROUGH 3.3.9, INSTRUMENTATION SPECIFICATIONS

3.3.5.1-01 CTS Table 3.2-2
DOC A.12
STS Table 3.3.5.1-1 and Table 3.3.5.2-1
JFD DB11

CTS Table 3.2-2 lists ESFAS Trip Function "trip level settings." The corresponding ITS Table 3.3.5.1-1 and ITS Table 3.3.5.2.-1 lists these "trip level settings" as "Allowable Values". It is not clear that the CTS "trip level settings" are not the physical trip actuation setpoints set into the actuation devices. Furthermore, it is assumed that the "Allowable Values" listed in ITS Table

3.3.5.1-1 and Table 3.3.5.2-1 are the values derived from the setpoint methodology analyses that include instrument channel uncertainties associated with the measured parameter and the installed instrumentation. Discussions of this change (DOC A.12) indicates that the CTS values are treated consistent with the ITS values when determining Function or Channel OPERABILITY, therefore, it is assumed that the change is an acceptable Administrative Change.

Comment: Revise submittal DOC to provide a more complete explanation of the defined terminology required to ensure the CTS "trip settings" and the ITS "Allowable Values" are both the administrative (TS limit) values placed on the trip actuation setpoint that includes all applicable instrument channel and measurement uncertainties.

JAFNPP Response:

BEYOND SCOPE ISSUE

3.3.5.1-02 CTS Table 3.2-2 Item 5
DOC M.6
ITS Table 3.3.5.1-1 Function 2.e
JFD DB11

The CTS Table 3.2-2, Item 5, Reactor Low Level Containment Spray Interlock trip level setting of ≥0.0 inch is changed in ITS Table 3.3.5.1-1 Function 2.e to ≥1.0 inch. DOC M.6 bases the new value on the current setpoint methodology. This item is considered beyond the scope of this (TSB) review and will be forwarded to the appropriate technical branch (EEIB) for additional consideration.

Comment: This RAI is provided for information purpose only and therefor no response is necessary.

BEYOND SCOPE ISSUE

3.3.5.1-03 CTS Table 3.2-2 Item 9
DOC M.4
ITS Table 3.3.5.1-1 Function 1.c and 2.c
JFD DB11

The CTS Table3.2-2 Item 9, Reactor Low Pressure, LPCI and Core Spray Injection Valve Open Permissive of ≥450 psig is changed in ITS Table 3.3.5.1-1 Functions 1.c and 2.c to ≥410. DOC M.4 bases the new value on the current setpoint methodology. This item is considered beyond the scope of this (TSB) review and will be forwarded to the appropriate technical branch (EEIB) for additional consideration.

Comment: This RAI is provided for information purpose only and therefor no response is necessary.

BEYOND SCOPE ISSUE

3.3.5.1-04 CTS Table 3.2-2 Item 11, 12, and 13
DOC L.1
ITS Table 3.3.5.1-1 Function 1.d, 2.f, 4.b, and 5.b
JFD DB2, DB3, and DB11

The trip setpoint Allowable Values in CTS Table 3.2-2 for the Core Spray Pump Start Timer (item 11), the RHR (LPCI) Pump Start Timer (item 12), and the Auto Blowdown Timer (item 13) are modified to reflect values corresponding to a 6 month to 24 month reduction in calibration Frequency. DOC L.1 justifies the changes in setpoint Allowable Values and SR Frequency based on the current setpoint methodology. This item (L.1) is considered beyond the scope of this (TSB) review and will be forwarded to the appropriate technical branch (EEIB) for additional consideration.

Comment: This RAI is provided for information purpose only and therefor no response is necessary.

BEYOND SCOPE ISSUE

3.3.5.1-05 CTS Table 3.2-2 Item 18
DOC A.16
ITS Table 3.3.5.1-1 Function 3.e
JFD DB11

The trip setpoint Allowable Values in CTS Table 3.2-2 for the Suppression Chamber High Level (item 13) is modified to reflect a value corresponding to $\leq$6 inches above normal level. The CTS 3.7.A.1 specifies the normal level as being from 13.88 to 14.00 inches. In the conversion, the assumption was to use the higher value of 14.00 inches which results in a setpoint value of 14.5 inches. DOC A.16 justifies the changes in setpoint Allowable value without discussing the assumption of using the higher value for the "normal level." This item (A.16) is considered beyond the scope of this (TSB) review and will be forwarded to the appropriate technical branch (EEIB) for additional consideration.

Comment: This RAI is provided for information purpose only and therefor no response is necessary.

BEYOND SCOPE ISSUE

3.3.5.1-06 CTS Table 3.2-2 Item 24
DOC L.6
ITS Table 3.3.5.1-1 Function 2.d
JFD DB11

The CTS Table 3.2-2 trip level setting for Item 24, Reactor Low Pressure is 285 to 335 psig. The corresponding Table 3.3.5.1-1 Function 2.d value for this setting is changed to ≥300 psig. DOC L.6 justifies this change based on the current setpoint methodology calculations. This item (L.6) is considered beyond the scope of this (TSB) review and will be forwarded to the appropriate technical branch (EEIB) for additional consideration.

Comment: This RAI is provided for information purpose only and therefor no response is necessary.

3.3.6.1-01 CTS 4.2.A and Table 3.2-8 Function 4
DOC L.2
ITS NA
JFD NA

The instrument ID numbers included in CTS 4.2.A and CTS Table 3.2-8 for Function 4, Containment High Range Radiation Monitor, are delete for this conversion. In this submittal, this change is categorized as a L-2, Less Restrictive discussion of change. This change is a removal of detail, not necessary to ensure OPERABILITY, and should be categorized as a LA change.

Comment: Provide corrected categorization for this discussion of change.

JAFNPP Response:

3.3.6.1-02 CTS Table 3.2-1 and Table 3.10-1
DOC A.16
STS Table 3.3.6.1-1 3.3.6.2-1 and SR 3.3.7.1.2 and 3.3.7.2.2
JFD DB10

CTS Table 3.2-1 and CTS Table 3.10-1 lists Isolation Trip Function "trip level settings." The corresponding ITS Table 3.3.6.1-1, ITS Table 3.3.6.2.-1, ITS SR 3.3.7.1.2, and ITS SR 3.3.7.2.2 lists these "trip level settings" as "Allowable Values". It is not clear that the CTS "trip level settings" are not the physical trip actuation setpoints set into the actuation devices. Furthermore, it is assumed that the "Allowable Values" listed in ITS Table 3.3.6.1-1, Table 3.3.6.2-1, ITS SR 3.3.7.1.2, and ITS SR 3.3.7.2.2 are the values derived from the setpoint methodology analyses that include instrument channel uncertainties associated with the measured parameter and the installed instrumentation. Discussions of this change indicates that the CTS values are treated consistent with the ITS values when determining Function or Channel OPERABILITY, therefore, it is assumed that the change is an acceptable Administrative Change. However, a more complete explanation of the defined terminology is required to ensure the CTS "trip settings" and the ITS "Allowable Values" are both the administrative (TS limit) values placed on the trip actuation setpoint that includes all applicable instrument channel and measurement uncertainties.

:

Comment: Revise submittal DOC to provide a more complete explanation of the defined terminology required to ensure the CTS "trip settings" and the ITS "Allowable Values" are both the administrative (TS limit) values placed on the trip actuation setpoint that includes all applicable instrument channel and measurement uncertainties. Reference RAI 3.3.5.1-01.

JAFNPP Response:

3.3.6.1-03 CTS Table 3.2-1 Action 3.A
DOC L.5
STS Table 3.3.6.1-1 Function 6.b and 3.3.6.1 Action I.1 and I.2
JFD CLB7

CTS Table 3.2-1 Action 3.A requires cold shutdown within 24 hours when the Reactor Vessel Water Level - Low (Level 3) Function of Shutdown Cooling Isolation is inoperable. ITS 3.3.6.1 Actions I.1 and I.2 change the requirement to proceed to cold shutdown to immediate initiation of action to restore inoperable channels "or" isolate the RHR Shutdown Cooling System. The justification for the change (L.5) states that the ITS Actions ensure that the shutdown cooling operations are not unnecessarily interrupted when needed, while ensuring action is continued to restore channels. Although this change appears to be consistent with the STS, DOC L.5 does not provide detailed information to ensure that the change is consistent with the plant safety analysis.

Comment: Provide additional discussion and justification concerning how this change is consistent with the plant safety analysis.

JAFNPP Response:

3.3.6.1-04 CTS Table 3.2-1 Action 3.B
DOC L.15
STS Table 3.3.6.1-1 Function 1.b Action E and 3.3.6.1 Action E
JFD CLB9

The CTS Table 3.2-1 Action 3.B requirement to isolate the Main Steam Lines is being relaxed in the corresponding ITS 3.3.6.1 Required Action E. ITS 3.3.6.1 Required Action E requires the plant placed in MODE 2 instead of isolating the Main Steam Lines. This Required Action appears acceptable because the initiating Function (Main Steam Line Pressure - Low) is only required in MODE 1. Therefore, placing the plant in MODE 2 under this Condition removes the plant from the MODE of Applicability. However, the corresponding STS 3.3.6.1 Completion Time for this Required Action is 8 hours. The ITS 3.3.6.1 Required Action E proposed 6 hour Completion Time results in a deviation from the STS which is not technically justified in CLB9.

Comment: Provide additional discussion and justification for the extended Completion Time, based on specific plant difference.

JAFNPP Response:

3.3.6.1-05 CTS Table 3.2-1
DOC A.7
STS Table 3.3.6.1-1 Function 1.e, 3.d 3.e, 3.f, 3.g, 3.h, 3.i, 3.j, 4.d, 4.e, 4.f, 5.a, 5.b, 5.c - Allowable Values
JFD DB10

Table 3.2-1 lists the trip level setting for RWC System, HPCI System, and RCIC Steam Line Area Temperature Functions and are listed as "≤40 degrees F above max ambient." In ITS Table 3.3.6.1-1 Function 1.e, 3.d 3.e, 3.f, 3.g, 3.h, 3.i, 3.j, 4.d, 4.e, 4.f, 5.a, 5.b, 5.c - "Allowable Values" these trip settings are changed to specific temperature values. DOC A.7 discusses and justifies the changes as administrative changes. However, it is not clear that the ITS values are equal to the CTS values for these trip Functions.

Comment: Provide a more in-depth discussion which verifies that each of these CTS values are not changed in the ITS or provide clear discussion how this change differs for the CTS.

JAFNPP Response:

BEYOND SCOPE ISSUE
3.3.6.1-06 CTS Table 3.2-1 Allowable Value "HPCI Turbine Steam Line High Flow"
DOC L.16
ITS Table 3.3.5.1-1 Function 3.a
JFD DB10

The trip setpoint Allowable Values in CTS Table 3.2-1 for the HPCI Turbine Steam Line High Flow are modified to reflect values corresponding to 160 to 161 in H_2O dp. DOC L.16 justifies the changes in setpoint Allowable Values based on the current setpoint methodology. This item (L.16) is considered beyond the scope of this (TSB) review and will be forwarded to the appropriate technical branch (EEIB) for additional consideration.

Comment: This RAI is provided for information purpose only and therefor no response is necessary.

JAFNPP Response:

BEYOND SCOPE ISSUE
3.3.6.1-07 CTS Table 3.2-1 Allowable Value "HPCI/RCIC Steam Line Low Pressure"
DOC M.14
ITS Table 3.3.5.1-1 Function 3.b and 4.b
JFD DB10

The trip setpoint Allowable Values in CTS Table 3.2-1 for the "HPCI/RCIC Steam Line Low Pressure" are modified to reflect values corresponding to ≥60 and ≤90 for HPSI and ≥61 and ≤90 for RCIC. DOC M.14 justifies the changes in setpoint Allowable Values based on the current setpoint methodology. This item (M.14) is considered beyond the scope of this (TSB) review and will be forwarded to the appropriate technical branch (EEIB) for additional consideration.

Comment: This RAI is provided for information purpose only and therefor no response is necessary.

3.3.6.1-08 CTS Table 4.1-1 and 4.1-2
DOC L.14
ITS NA
JFD NA

The details removed from CTS Tables 4.1-1 and 4.1-2 as discussed in DOC L-14 are incorrectly identified as Less Restrictive changes. This change is a removal of detail, not necessary to ensure OPERABILITY, and should be categorized as a LA change.

Comment: Provide corrected categorization for this discussion of change.

JAFNPP Response:

3.3.6.1-09 CTS NA
DOC NA
ITS 3.3.6.1 Condition B
JFD CLB7

Justification For Difference CLB 7 provides discussion and justification for omitting the word "automatic" from ITS 3.3.6.1 Condition B, based on the fact that all Manual Initiation Functions are omitted. It is not clear that the STS wording is not correct. This omission results in a deviation from the STS that does not seem necessary.

Comment: Provide additional clarification for the change or include the term "automatic" in ITS Condition B.

JAFNPP Response:

3.3.6.2-01 CTS NA
DOC NA
ITS ITS 3.3.6.2 Condition B
JFD PA1

:

STS 3.3.6.2 Condition B wording is changed in the ITS to omit "automatic" and "secondary containment". It is not clear that the STS wording change is necessary. No discussion or justification is provided for the STS deviation.

Comment: Provide additional clarification for the change or include the term "automatic" and "secondary containment" in ITS Condition B.

JAFNPP Response:

3.3.6.2-02 CTS RETS Table 3.10-2 Note (f)
DOC L.6
ITS NA
JFD NA

CTS RETS Table 3.10-2 Note (f) provides detail of how to perform an LSFT (where possible using test jacks) which is omitted in the ITS as stated because this information is included in the definition for LSFT. DOC L.6 documents this change as less-restrictive. This change is actually a removal of detail not required to ensure OPERABILITY. Therefore, the change should be reclassified as an LA "Generic Less Restrictive Change."

Comment: Provide corrected change classification and associated documentation.

JAFNPP Response:

BEYOND SCOPE ISSUE
3.3.7.2-01 CTS Table 3.2.2 Note (3.E)
DOC L.1
ITS Table 3.3.8.1-1
JFD NA

The Trip Level Settings for the LOP Instrumentation listed in CTS Table 3.2-2 are changed in ITS Table 3.3.8.1-1. DOC L.1 states that the new ITS Allowable Values are consistent with the current JAFNPP setpoint methodology. This item (L.1) is considered beyond the scope of this (TSB) review and will be forwarded to the appropriate technical branch (EEIB) for additional consideration.

Comment: This RAI is provided for information purpose only and therefor no response is necessary.

3.3.8.2-01 CTS 3.9.G
DOC L.1, M.1
ITS 3.3.8.2.1
JFD CLB1

:

CTS 3.9.G does not provide specific Applicability requirements for the RPS Electric Power Monitoring instrumentation. The corresponding STS 3.3.8.2 requires Applicability for this instrumentation in MODES 1, 2, and 3, and in MODES 4 and 5 with any control rod withdrawn from a core cell containing one or more fuel assemblies. ITS 3.3.8.2 deletes the MODE 3 and 4 Applicability and changes the requirements of ITS SR 3.3.8.2.1 and added ITS 3.3.8.2 Condition D. JFD CLB1 justifies the omission of MODE 3 and 4 Applicability based on the ITS 3.3.1.1 Applicability of the RPS instrumentation. It is not clear why the STS Applicability requirement for this instrumentation is not maintained for the JAFNPP design. DOC L.1, M.1, and JFD CLB 1 do not provide adequate justification for omitting the MODE 3 and 4 Applicability due to design or operational differences.

Comment: Provide additional discussion and justification for the change, based on plant specific design or operational differences.

JAFNPP Response:

3.3.8.2-02 CTS 3.9.G.1, 3.9.G.2, 3.0.C
DOC L.3
ITS LCO 3.3.8.2 (ACTION C.2)
JFD CLB1

When the requirements of CTS 3.9.G.1 or CTS 3.9.G.2 are not met the plant must be placed in cold shutdown within 24 hours in accordance with CTS 3.0.C. STS 3.3.8.2 Action C also requires shutdown to MODE 4 when applicable RPS power sources are Inoperable. ITS 3.3.8.2 omits the requirement to place the plant in MODE 4 when Required Actions and Completion Times of Conditions A and B are not met. DOC L.3 justifies this change based on the automatic rod block Function during MODE 3 operation. It is not clear that a plant specific design difference justifies this STS deviation.

Comment: Provide additional discussion and justification for the STS deviation based on the specific JAFNPP design.

JAFNPP Response:

BEYOND SCOPE ISSUE

3.3.6.1-03 CTS 4.9.G.3
DOC M.3
ITS SR 3.3.8.2.3
JFD DB1

The CTS 4.9.G.3 setpoint or Allowable Value of $\geq$108V is changed in ITS SR 3.3.8.2.3 to $\geq$109.9V. DOC M.3 provides justification for the change based on current setpoint methodology. This item (M.3) is considered beyond the scope of this (TSB) review and will be forwarded to the appropriate technical branch (EEIB) for additional consideration.

:

Comment: This RAI is provided for information purpose only and therefor no response is necessary.

3.3.6.1-04 CTS 4.9.G.2
DOC A.3
ITS SR 3.3.8.2.2
JFD DB1

The CTS 4.9.G.2 setpoints for Channel A and Channel B RPS MG Set Source are changed in the corresponding ITS SR 3.3.8.2.2 to one value, ≥112.3V. JFD DB1 justifies the change as a simplification of presentation. The submittal does not discuss or justify the changed CTS setpoint values for this Function. In addition, as noted throughout the submittal, the CTS setpoint values are changed in the ITS to Allowable Values. It is not clear that the CTS values are equal to the ITS values for the trip actuation Functions (See RAI 3.3.5.1-01).

Comment: Provide additional discussion and justification for the changed presentation and changed/omitted setpoints.

JAFNPP Response:

SECTION 3.4, REACTOR COOLANT SYSTEM

RAIs

Generic Terminology for jet pump loop flow, jet pump flow, recirculation loop, recirculation pump loops, and recirculation drive flow have been changed, interchanged, etc. Only change the nomenclature that is plant specific. Other changes are generic and have to be changed through the established change process, e.g., the TSTF. This refers to all PA changes.

3.4.1 Recirculation Loops Operating

3.4.1-01 ITS 3.4.1
CTS 3.5.J.1
DOC M2
JFD CLB1
JFD X1

ITS 3.4.1 is revised to contain CTS 3.5.J.1 requirements related to core thermal hydraulic stability as ITS 3.4.1 ACTION A and ITS SR 3.4.1.1. These details deviate from the STS but are justified by JFD CLB1. Condition B has also been added and is not currently contained in the CTS or the STS. It is justified by JFD X1.

Comment: The staff considers this is a Beyond Scope issue. Both the licensing basis portion and the additions need to be reviewed in the context of their impact upon the specification as currently written.

JAFNPP Response:

3.4.1-02 CTS 3.5.J
DOC M3
JFD CLB1
JFD X2

Similarly, a surveillance requirement has been added that is not in the CTS or the STS and is therefore a Beyond Scope issue

JAFNPP Response:

3.4.1-03 JFD PA1

Editorial changes have been made that are generic and must therefore be made through the established change process.

Comment: These changes must be made through the TSTF. If this is a plant specific change, please justify on a plant specific basis.

JAFNPP Response:

3.4.2 Jet Pumps

3.4.2-01 LCO 3.4.2
JFD PA2

Editorial changes have been made that are generic and must therefore be made through the established change process.

Comment: These changes must be made through the TSTF. If this is a plant specific change, please justify on a plant specific basis.

JAFNPP Response;

3.4.3 Safety Relief Valves

3.4.3-01 DOC LA3
JFD X1

CTS 4.6.E.1 does not specify the IST program. The STS has a frequency of IST or [24?] months. JFD X1 proposed to delete the [24?] months. There appears to be no reason why the ITS should differ from the STS.

Comment: Retain the STS.

JAFNPP Response:

3.4.4 RCS Operational Leakage

3.4.4-01 JFD PA1

Same as above.

Comment: Retain STS or provide justification.

JAFNPP Response:

3.4.XXX RCS Pressure Isolation Valve (PIV) Leakage

3.4.XXX-01 CLB1

This specification has been deleted from the Technical Specifications (TS). It is this reviewer's opinion that a specification of this importance should be retained in the TS. To try to adopt the standard and not include this specification is not in keeping with our current practice. This is a Beyond Scope Issue and will be evaluated by the tech staff. No response is required from the licensee

3.4.5 RCS Leakage Detection Instrumentation

Comments: There are no comments. No response is required from the licensee.

3.4.6 RCS Specific Activity

3.4.6-01 JFD PA2

Many editorial changes have been made that do not appear to be reflected in the CTS.

Comment: As indicated above, the generic changes must be made through the TSTF. Any plant specific changes should be identified in the CTS justified as such.

JAFNPP Response:

:

3.4.7 Residual Heat Removal (RHR) Shutdown Cooling System - Hot Shutdown

3.4.7-01 DOC M1
JFD CLB1
JFD PA1, 2, 3

The CTS indicates that there is not an RHR Shutdown Cooling System-Hot Shutdown specification, however, changes have been made to the specification based on current licensing basis.

Comment: This is obviously confusing. No CTS specification references are provided. Licensee to provide detailed justification. These changes appear to be Beyond Scope issues.

JAFNPP Response:

3.4.8 Residual Heat Removal (RHR) Shutdown Cooling System - Cold Shutdown

3.4.8-01 Doc M1
JFD CLB1
JFD PA1

The same comment as RAI 3.4.7-01above applies.

Comment: Provide detailed justification.

JAFNPP Response:

3.4.9 Pressure and Temperature (P/T) Limits

3.4.9-01 JFD CLB1

The limits are not specified, i.e., Figures, etc.

Comment: Provide detail of implementation and indicate where the P/T limits are specified.

JAFNPP Response:

3.4.9-02 JFD PA2

The change from "and" to "or" to be consistent with the writer's guide is a generic change that changes the meaning of the Condition.

Comment: This change must be changed through the TSTF.

:

JAFNPP Response

3.4.9-03 JFD PA3

These changes are also generic and must follow established practice for these changes.

Comment: These changes must be changed by the TSTF process.

JAFNPP Response:

3.4.9-04 CTS 3.6.A.5
DOC A4

CTS 3.6.A.5 indicates that with any of the limits 3.6.1 through 3.6.A.4 exceeded.... 3.6.A.4 specifies "during all Modes of operation. Would this not imply that 3.6.A.5 then should be the same. CTS 3.6.A does not specify Applicability. DOC A2 concluded that because there was not a stated Applicability in CTS 3.6.A, it implies that CTS 3.6.A is applicable at all times. DOC A2 logic conflicts with DOC A4. DOC A4 concludes that because CTS 3.6.C does not include an Applicability statement then the Applicability can be determined from the actions required when the LCO cannot be met. DOC A4 states "Since this Specification requires that, if the Required Actions and Completion Times are not met, the reactor be placed in Cold Shutdown (MODE 4), it can be implied that the Specification is Applicable in MODES 1, 2 and 3." A similar difference in logic exists between DOC L3 of ITS 3.4.6 and DOC A2 of ITS 3.4.9.

Comment: Provide discussion regarding the above apparent conflict in the discussions.

JAFNPP Response:

3.4.9-05 CTS 4.6.A.1
SR 3.4.9.7
SR 3.4.9.8
DOC A1

CTS 4.6.A.1.a and b require recording the reactor vessel temperature when flange temperature is $\leq$ 120 °F and $\leq$ 100 °F respectively and the studs are tensioned. The corresponding ITS SR 3.4.9.7 and SR 3.4.9.8 do not specify that these surveillances are only performed when the studs are tensioned.

Comment: While this change is consistent with the STS, provide documentation for deleting the exception for performing the surveillances only when the studs are tensioned.

JAFNPP Response

:

3.4.9-06 CTS 3.6.A.2, .3, .4
Figure 3.6-1
Bases

CTS 3.6.A.2, 3.6.A.3 and 3.6.A.4 specify being to the right of CTS Figure 3.6-1 curves A, B, and C respectively, which makes clear the safe area for operation. By implication the same applies (being to the right) of the curves on ITS Figure 3.4.9-1. ITS 3.4.9 including ITS Figure 3.4.9-1, which is exactly the same as CTS figure 3.6-1 Part 3, and ITS 3.4.9 Bases do not specify anywhere that the safe area relative to curve A, B, or C is to the right. ITS 3.4.9 simply requires maintaining pressure and temperature within limits.

Comment: State where in the LCO the limits are found. Additionally, provide clarification in ITS 3.4.9 Bases where the safe area relative to ITS Figure 3.4.9-1 curves A, B, and C is located.

JAFNPP Response

3.4.9-07 CTS 4.6.A.6.a, .b, .c
DOC A6

CTS 4.6.A.6.a, 4.6.A.6.b, and 4.6.A.6.c specify that the differential temperatures be recorded. The corresponding ITS SR 3.4.9.3 and SR 3.4.9.5 do not include the explicit requirement to record the differential temperature.

Comment: The CTS Markup indicates that these deletions are justified by DOC A6. DOC A6 does not identify CTS 4.6.A.6.a, 4.6.A.6.b, and 4.6.A.6.c in the list of specifications affected by the change. Include these in DOC A6.

JAFNPP Response:

3.4.9-08 SR3.4.9.4
DOC L2
JFD X1
NOTE 2

ITS SR 3.4.9.4 did not have a corresponding CTS and it was added as a deviation from the STS. ITS SR 3.4.9.4 allows verifying the active recirculation drive flow exceeds 40% of rated drive flow or the active loop has been operating below 40% for a period no longer than 30 minutes as an alternative to performing ITS SR 3.4.9.3 (STS 3.4.10.3).

Comment: Justification for the change was provided in JFD X.1 and DOC L2. However, this is a deviation from both the CTS and the STS. Licensee is to provide detail information for the staff to review as a Beyond Scope issue.

JAFNPP Response;

3.4.9-09 JFD TA1

STS SR 3.4.9.3 is modified in the ITS to incorporate Revision 0 of TSTF-035. TSTF 035 does not delete the bracketed phrase [with reactor steam dome pressure greater than or equal to 25 psig].

Comment: Does this phrase apply to JAFNPP? Also a justification for incorporating the TSTF needs to be provided. It is not sufficient to say you are incorporating the TSTF.

JAFNPP Response

3.4.10 Reactor Steam Dome Pressure

3.4.10-01 DB1

This specification has been deleted from the Technical Specifications (TS). It is staff's opinion that a specification of this importance should be retained in the TS. To try to adopt the standard and not include this specification is not in keeping with our current practice.

Comment: The licensee should retain the CRTS requirements or provide detailed justification for this deviation for the staff to review as a Beyond Scope issue.

JAFNPP Response:

SECTION 3.6, CONTAINMENT SYSTEMS

3.6.1.1 Containment

3.6.1.1-01 DOC A2
DOC LA 1
CTS 1.0.M
ITS B.3.6.1 Bases - BACKGROUND

CTS 1.0.M defines PRIMARY CONTAINMENT INTEGRITY. A markup of CTS 1.0.M shows that only the requirements that the drywell and suppression chamber are intact and that the manways are closed are relocated to ITS B3.3.6.1 Bases and the relocation is justified by DOC LA1. The rest of CTS 1.0.M is covered by DOC A2. DOC A2 states that portions of CTS 1.0.M are covered or relocated to other LCOs in ITS 3.6 and that PRIMARY CONTAINMENT INTEGRITY is changed to containment shall be OPERABLE. DOC A2 also states that this

definition is deleted. While the former statements are correct and acceptable, the latter statement is incorrect. The definition is not deleted but is relocated to ITS B3.6.1 Bases - BACKGROUND which makes this portion of the change a Less Restrictive (LA) change.

Comment: Revise the CTS markup and the discussions and justifications associated with DOC LA1 to include the rest of CTS 1.0.M. Modify DOC A2 accordingly.

JAFNPP Response:

3.6.1.1-02 DOC LA 2
CTS 4.7.A.1
ITS SR 3.6.1.1.1 and Associated Bases

CTS 4.7.A.1 specifies that the accessible interior surfaces of the drywell and above the water line of the torus shall be inspected once per 24 months for evidence of deterioration. The corresponding ITS SR is SR 3.6.1.1.1. The CTS markup and DOC LA2 indicate that the details and frequency are proposed to be relocated to the Primary Containment Leakage Testing Program. Since the program implements 10 CFR 50 Appendix J, Option B, the frequencies for performing the various surveillances and tests can be changed based on previous satisfactory test performance. Nothing in DOC LA2 nor the SE associated with Amendment 234, dated October 4, 1996, which implements 10 CFR 50 Appendix J Option B at the James A. Fitzpatrick Nuclear Power Plant (JAFNPP) would allow the frequency of CTS 4.7.A.1 to change from once per 24 months, to almost anything which would be allowed by the Primary Containment Leakage Testing Program. See Comment Number 3.6.1.1-4 for additional concerns with regards to 10 CFR 50 Appendix J Option B changes to the ITS. The staff recognizes that 10 CFR 50 Appendix J, Section V.A requires that a visual inspection of the accessible interior and exterior surfaces of the containment structures and components be performed prior to any Type A test (i.e., every 40 months), for some reason the visual examination of the drywell and torus at JAFNPP is required to be done every 24 months and this surveillance was not modified by Amendment 234. The staff considers the relocation of this requirement with the associated allowance for a performance based surveillance frequency to be a beyond scope of review item for this conversion and the surveillance should be retained.

Comment: Revise the CTS/ITS markups to show the retention of this surveillance and provide any appropriate discussion and justification for this change. See Comment Number 3.6.1.1-04.

JAFNPP Response:

3.6.1.1-03 DOC LA 3
JFD DB 1
JFD Bases PA 2
JFD Bases DB 4
CTS 3.7.A.5.e
CTS 4.7.A.5.d
STS SR 3.6.1.1.2
ITS SR 3.6.1.1.2 and Associated Bases

The CTS and ITS markup of CTS 3.7.A.5.e, CTS 4.7.A.5.d and STS SR 3.6.1.1.2 shows that the details that the drywell and suppression chamber leakage rate limit shall be monitored via the suppression chamber 10 minute pressure transient of 0.25 inches of water/minute are relocated to ITS B3.6.1.1 Bases - SR 3.6.1.1.2. This change is justified by DOC LA1 and JFD DB1. The staff considers this change to be a generic change which is a beyond the scope of review **(BSCR)** for this conversion.

Comment: Delete this generic change.

JAFNPP Response:

3.6.1.1-04 JFD CLB1
JFD Bases CLB1
JFD Bases CLB 3
JFD Bases PA 2
CTS 4.7.A.2
STS SR 3.6.1.1.1 and Associated Bases
ITS SR 3.6.1.1.1 and Associated Bases

CTS 4.7.A.2.a requires leak rate testing in accordance with the Primary Containment Leakage Rate Testing Program which is based on the requirements of 10 CFR 50 Appendix J, Option B. STS SR 3.6.1.1.1 requires the visual examination and leakage rate testing be performed in accordance with 10 CFR 50 Appendix J as modified by approved exemptions. ITS SR 3.6.1.1.1 modifies STS SR 3.6.1.1.1 to conform to CTS 4.7.A.2 as modified in the CTS markup. The STS is based on Appendix J, Option A while the CTS and ITS are based on both Appendix J, Options A and B. Changes to the STS with regards to Option A versus Option B are covered by a letter from Mr. Christopher I. Grimes to Mr. David J. Modeen, NEI, dated 11/2/95 and TSTF-52 as modified by staff comments 10/96 and 12/98. The changes to ITS 3.6.1., 3.6.2, 3.6.3, 3.6.9 and their Associated Bases are not in conformance with the letter and TSTF-52 as modified by staff comments. See Comment Numbers 3.6.1.1-02, 3.6.1.1-06, 3.6.1.2-02, 3.6.1.3-01, 3.6.1.3-04 and 3.6.1.3-07.

Comment: Licensee should revise its submittal to conform to the 11/2/95 letter and TSTF-52 modified by the staff. See Comment Numbers 3.6.1.1-02, 3.6.1.1-06, 3.6.1.2-02, 3.6.1.3-01, 3.6.1.3-04 and 3.6.1.3-07.

JAFNPP Response:

3.6.1.1-05 JFD Bases TP1
ITS B3.6.1.1 Bases - BACKGROUND

The second paragraph, item a.2 of ITS B3.6.1.1 Bases - BACKGROUND is modified by the phrase "or equivalent isolation methods." The ITS markup shows that JFD Bases TP1 provides a justification for this change. No JFD Bases TP1 provided. A similar type change was proposed in TSTF-196 which was rejected by the staff. See Comment Numbers 3.6.1.3-11 and 3.6.4.2-05.

Comment: Delete this change. See Comment Numbers 3.6.1.3-11 and 3.6.4.2-05.

JAFNPP Response:

3.6.1.1-06 CTS 4.7.A.2.c
ITS SR 3.6.1.1.1 and Associated Bases
ITS SR 3.6.1.3.11 and Associated Bases

CTS 4.7.A.2.c specifies that once per 24 months the leakage rate of Low Pressure Coolant Injection (LPCI) System valves 10 AOV-68A and B and of Core Spray (CS) System Valves 14AOV - 13 A and B shall be within the specified limits when either pneumatically or hydrostatically tested. The corresponding ITS SR is ITS SR 3.6.1.3.11. The CTS and ITS surveillances for these valves is based on 10 CFR 50 Appendix J Option A for Type C testing. Amendment 234 did not convert this test and its associated frequency to 10 CFR 50 Appendix J Option B. Thus, ITS SR 3.6.1.1.1 needs to be modified either by a Note or a statement in the SR that the frequency for ITS SR 3.6.1.3.11 is in accordance with 10 CFR 50 Appendix J Option A, rather that 10 CFR 50 Appendix J Option B (Primary Containment Leakage Rate Testing Program). As proposed in the ITS, there could be some confusion as to which frequency to use. See Comment Numbers 3.6.1.3-04 and 3.6.1.3-07.

Comment: Revise the CTS/ITS markups to address this concern and provide the appropriate discussions and justifications. See Comment Numbers 3.6.1.3-04 and 3.6.1.3-07.

JAFNPP Response:

3.6.1.2 Primary Containment Air Lock

3.6.1.2-01 DOC A4
JFD DB1
JFD Base DB1
CTS 3.7.A.2
ITS 3.6.1.2 ACTIONS Note 2 and Associated Bases

CTS 3.7.A.2 is modified by the addition of ITS 3.6.1.2 ACTIONS Note 2, which allows separate condition entry for each air lock. The change is justified in the CTS by DOC A4. DOC A4 discusses the application of the Note as it applies to the ITS not the CTS. The staff cannot determine, based on the CTS wording and DOC A4, that the addition of this Note is an Administrative change to the CTS. The staff concludes based on the wording of CTS 3.7.A.2 and 3.7.A.8 that separate condition entry is not allowed in the CTS and thus the addition of this Note is a Less Restrictive (L) change.

Comment: Revise the CTS markup and provide a discussion and justification for this Less Restrictive change.

JAFNPP Response:

3.6.1.2-02 JFD CLB 1
JFD PA 2
JFD Bases CLB 1
JFD Bases PA 3
JFD Bases PA 5
JFD Bases PA 6
JFD Bases DB 1
JFD Bases X2
STS SR 3.6.1.2.1 and Associated Bases
ITS SR 3.6.1.2.1 and Associated Bases

Comment: See Comment Number 3.6.1.1-4.

JAFNPP Response:

3.6.1.2-03 JFD Bases PA 2
JFD Bases DB 1
STS B3.6.2/3.6.1.2 Bases - ACTIONS (NUREG 1430, 1431, 1432, and 1434)
STS B3.6.1.2 Bases - ACTIONS (NUREG 1433)
ITS B3.6.1.2 Bases ACTIONS

NUREG - 1433 STS 3.6.1.2 is based on one containment airlock. JAFNPP has modified NUREG STS 3.6.1.2 in the ITS to reflect the JAFNPP design of two containment airlocks. While the changes made in ITS 3.6.1.2 conform to STS 3.6.2/3.6.1.2 in NUREGs 1430, 1431, 1432, and 1434 which are based on two containment airlocks, some of the changes made to ITS B3.6.1.2 Bases - ACTIONS are not in conformance with the accepted wording found in the other NUREGs for two containment airlocks. In particular, the discussions for ACTION Note 1, for Required Action A Note 2, and Required Action B Note 1 deviate from the standard by deleting sentences, changing words or making similar sentences different, without adequate justification.

Comment: Revise the ITS markup to bring it into conformance with the other NUREGs or provide a discussion and justification for the deviations.

JAFNPP Response:

3.6.1.2-04 JFD Bases PA 2
ITS B3.6.1.2 Bases - A.1, A.2, and A.3

The last paragraph of ITS B3.6.1.2 Bases - A.1, A.2 and A.3 is modified by a sentence describing the administrative controls associated with entry and exit through the OPERABLE airlock door. The wording of the sentence is ambiguous and could allow the airlock door to remain open as long as it was being used for entry and exit. The STS/ITS requires that the airlock door be closed immediately after each entry and exit (See ITS B3.6.1.2 Bases ACTION first paragraph). This added sentence does not require this.

Comment: Revise this sentence or delete it.

JAFNPP Response:

3.6.1.2-05 JFD TA 1
JFD Bases PA 2
JFD Bases TA 1
STS SR 3.6.1.2.2 and Associated Bases
ITS SR 3.6.1.2.2 and Associated Bases

STS SR 3.6.1.2.2 requires verifying only one door in the airlock will open at a time at six month intervals. The interval is modified in ITS SR 3.6.1.2.2 from 6 months to 24 months. This modification is in accordance with TSTF-17; however, the Bases changes are not in accordance with TSTF-17.

Comment: Revise the ITS Bases to be in accordance with TSTF-17 or justify the deviations.

JAFNPP Response:

3.6.1.3 Primary Containment Isolation Valves (PCIVs)

3.6.1.3-01 DOC A6
JFD CLB 10
JFD CLB 11
JFD X4
JFD Bases CLB 10
JFD Bases CLB 11
JFD Bases DB 5
CTS 4.7.A.2.b
CTS 4.7.A.2.c
ITS SR 3.6.1.3.10, SR 3.6.1.3.11 and Associated Bases

Comment: See Comment Number 3.6.1.1-04, 3.6.1.1-06, 3.6.1.3-04 and 3.6.1.3-07.

JAFNPP Response:

3.6.1.3-02 DOC M1
JFD PA 2
CTS 3.7.D.3
STS 3.6.1.3 ACTION I
ITS 3.6.1.3 ACTION G

ITS 3.6.1.3 ACTION G is proposed to be added to CTS 3.7.D.3 in the event Condition A or B and associated Completion Times cannot be met in MODES 4 and 5. STS 3.6.1.3 Condition I

defines the acronym OPDRVs in Condition I. ITS 3.6.1.3 ACTION F removes the phrase "operation with a potential for draining the reactor vessel (OPDRVs) from Condition G and places it in RA G.1 in place of "OPDRVs." JFD PA 2 states the change is made for editorial clarity. DOC M.1 implies that there are a number of operations that deal with OPDRVs including but not limited to RHR Shutdown Cooling System operation. The justifications do not provide adequate justification as to why ITS 3.6.1.3 ACTION G should not apply to the other OPDRVs implied by the justifications. Since the required ACTIONs (RA) are connected by an "or" there is no guaranty that RA G.1 will be used for when the RHR valves are inoperable rather than RA G.2. While the staff considers the addition of ITS 3.6.1.3 ACTION G as acceptable, the staff has determined that the modifications made are a generic change which is beyond the scope of review for this conversion.

Comment: Delete this generic change.

JAFNPP Response:

3.6.1.3-03 DOC M2
JFD X5
JFD Bases X5
CTS 4.7.D.1.b
STS SR 3.6.1.3.10 and Associated Bases
ITS SR 3.6.1.3.8 and Associated Bases

CTS 4.7.D.1.b specifies that the instrument line EFCVs shall be tested for proper operation. The CTS is modified by DOC M2 to add the acceptance criteria that the EFCV actuates to the isolation position on an actual or simulated instrument line break. The corresponding ITS SR is ITS SR 3.6.1.3.8. The modified CTS 4.7.D.1.b and ITS SR 3.6.1.3.8 differ from STS SR 3.6.1.3.10 in two places. The STS words "to restrict flow to less than 1 gph" is replaced with "to the isolation position" and the ITS adds the words "an actual or". While the former change can be considered plant specific and therefore is acceptable; the later change is not acceptable. The addition of the words "an actual or" is applicable to other BWR-4 and BWR-6 plants and the technical implications of the change are unknown. Thus the change is considered as a generic change which would be a beyond scope of review item **(BSCR)** for this review.

Comment: Delete this generic change.

JAFNPP Response:

3.6.1.3-04 DOC L3
DOC L10
JFD X8
JFD Bases X12
CTS 3.7.A.2
CTS 3.7.D
STS 3.6.1.1 ACTIONS
STS 3.6.1.3 ACTIONS A, B and Associated Bases
ITS 3.6.1.1 ACTIONS

:

ITS 3.6.1.3 ACTIONS A, B, E and Associated Bases

CTS 3.7.A.2 has been modified by the addition of ITS 3.6.1.3 ACTION E which provides the Required Actions for the LPCI and CS Systems' check valve leakage not within limit. In addition, STS 3.6.1.3 Conditions A and B have been modified in the ITS to account for this new ACTION. With regards to these changes associated with the pneumatically/hydrostatically tested valve leakage, the pneumatic/hydrostatic test leakage is considered as part of the 10 CFR 50 Appendix J Type B and C leakage (See Comment Numbers 3.6.1.1-04, 3.6.1.1-06 and 3.6.1.3-07) and thus is covered by STS 3.6.1.1 ACTIONS and 3.6.1.3 ACTIONS A, B and C for PCIVs. In the IT'S THE ACTIONS would be ITS 3.6.1.1 ACTIONS and ITS 3.6.1.3 ACTIONS A and B. Even though the CTS completion time change from no restoration time (immediate shutdown per CTS 3.7.A.8) to an ITS Completion Time of 4 hours (ITS 3.6.1.3 ACTION A) or 1 hour (ITS 3.6.1.1 ACTION or ITS 3.6.1.3 ACTION B) is a Less Restrictive change which would be acceptable, the addition of ITS 3.6.1.3 ACTION E is a variation of the generic change proposed in TSTF-207 Rev 2, which is under review by the staff and it is uncertain at this time as to whether it will be rejected in part or accepted. See Comment Number 3.6.1.3-08 for additional concerns with regards to TSTF-207.

Comment: Delete this generic change. See Comment Numbers 3.6.1.1-04, 3.6.1.1-06, 3.6.1.3-07, and 3.6.1.3-08.

JAFNPP Response:

3.6.1.3-05 DOC L4
JFD TA3
JFD Bases DB6
JFD Bases DB10
JFD Bases TA3
STS 3.6.1.3 ACTION C and Associated Bases
ITS 3.6.1.3 ACTION C and Associated Bases

ITS 3.6.1.3 ACTION C and its Associated Bases modifies STS 3.6.1.3 ACTION C and its Associated Bases to incorporate TSTF-30. The changes to ITS 3.6.1.3 ACTION C are not in accordance with TSTF-30, in particular the Note Associated with Condition C should read "Only applicable to penetration flow paths with only one PCIV and a closed system" since DOC L4 states that the valves covered by this ACTION are in closed systems, this change should not cause a problem. In addition , the Bases is not in accordance with TSTF 30.

Comment: Licensee to update submittal to conform to TSTF-30.

JAFNPP Response:

3.6.1.3-06 JFD CLB 4
JFD Bases CLB 4
CTS 3.7.A.3
ITS SR 3.6.1.3.1 Note 1 and Associated Bases

Comment: See Comment Number 3.7.A.3-02.

JAFNPP Response:

3.6.1.3-07 JFD CLB 11
JFD Bases CLB 11
CTS 4.7.A.2.c
STS SR 3.6.1.3.14 and Associated Bases
ITS SR 3.6.1.3.11 and Associated Bases

CTS 4.7.A.2.c specifies that once per 24 months the leakage rate of LPCI System valves 10 AOV-68A and B and of CS System valves 14AOV-13 A and B shall be within the specified limits when either pneumatically or hydrostatically tested. The corresponding ITS SR is ITS SR 3.6.1.3.11. The CTS and ITS surveillances for these valves is based on 10 CFR 50 Appendix J Option A for Type C testing. Amendment 234 did not convert this test and its associated frequency to 10 CFR 50 Appendix J Option B. Thus, ITS SR 3.6.1.3.11 needs to be modified to conform to the frequency specified in STS SR 3.6.1.3.14. See Comment Numbers 3.6.1.1-04, 3.6.1.1-06, 3.6.1.3-01 and 3.6.1.3-04.

Comment: Revise the ITS markup and provide any necessary discussion and justification for this change. See Comment Numbers 3.6.1.1-04, 3.6.1.1-06, 3.6.1.3-01, and 3.6.1.3-04.

JAFNPP Response:

3.6.1.3-08 JFD Bases CLB 9
JFD Bases X1
JFD Bases X12
STS 3.6.1.3 ACTION A, B, and D
ITS 3.6.1.3 ACTIONS A, B, and D and Associated Bases

STS 3.6.1.3 ACTIONS A, B, and D have been modified in ITS 3.6.1.3 ACTIONS A, B, and D to reflect the changes associated with TSTF-207 Rev O, which has been approved by the staff. While the changes made to ITS 3.6.1.3 ACTIONS A, B, and D are in accordance with TSTF 207 Rev 0, the changes made to the Associated Bases are not in accordance with the TSTF. See Comment Number 3.6.1.3-04.

Comment: Licensee should revise submittal to conform to TSTF 207 Rev 0. See Comment Number 3.6.1.3-04.

JAFNPP Response:

3.6.1.3-09 JFD Bases PA 1
STS B3.6.1.3 Bases - BACKGROUND
ITS B3.6.1.3 Bases - BACKGROUND

The first sentence in STS B3.6.1.3 Bases - BACKGROUND states the following: "The function of the PCIVs...is to limit fission product release...to within limits." ITS B3.6.1.3 Bases - BACKGROUND modifies this sentence to state the following: "The function of the PCIVs...is to ensure fission product release...is within limits." The change of the word "limit" to "ensure" changes the meaning of the sentence. The ITS implies that the PCIV function guarantees that the fission product release will always be at its limit, where the STS words do not imply this, which is the intent of the sentence.

Comment: Delete this change.

JAFNPP Response:

3.6.1.3-10 JFD Bases PA 1
STS B3.6.1.3 Bases - ACTIONS
ITS B3.6.1.3 Bases - ACTIONS

The third paragraph, last sentence of STS B3.6.1.3 Bases - ACTIONS states: "Pursuant to LCO 3.0.6, these actions are not required...". ITS B3.6.1.3 Bases - ACTIONS modifies this sentence by deleting "are not" and replacing it with "would not be". For consistency sake, this change has not been made in other places within the ITS where this statement occurs. In addition, the change is for editorial clarity. The staff does not believe it enhances clarity and may change the meaning of the sentence.

Comment: Delete this change.

JAFNPP Response:

3.6.1.3-11 JFD Bases PA 1
STS B3.6.1.3 Bases - C.1, C.2, SR 3.6.1.3.3 and SR 3.6.1.3-4
ITS B3.6.1.3 Bases - C.1 and C.2, SR 3.6.1.3.2 and SR 3.6.1.3-3

In a number of places, ITS B3.6.1.3 Bases changes the STS words "valves," "valves and blind flanges", "these valves," and "PCIVs" to the generic term "isolation devices". The change is incorrect. The term "isolation device" is not defined in the Bases and based on its intended use encompasses more than just valves, it would include blind flanges, plugs, caps, and other suitable closure devices (See Comment Number 3.6.1.1-05). In all cases where the change was made the discussion concerned the applicability of the Note and/or the verification of valve misposition. Blind flanges, plugs, caps and other suitable closure devices cannot be mispositioned. They are fixed isolation devices. In addition, a similar change was proposed in TSTF 196 which was rejected by the staff. Thus the STS words are the correct words. See Comment Number 3.6.4.2-05.

Comment: Delete this change. See Comment Numbers 3.6.1.1-05 and 3.6.4.2-05.

JAFNPP Response:

3.6.1.3-12 JFD Bases PA1
ITS B3.6.1.3 Bases - C.1 and C.2

The second paragraph of ITS B3.6.1.3 Bases - C.1 and C.2 adds the following sentence at the end of the paragraph: "This Note is necessary since this Condition is written specifically to address those penetrations with a single PCIV." This change is based on enhanced editorial clarity or correction of a grammatical/typographical error. This addition does neither of these items. In fact, it duplicates or restates the first sentence in that paragraph.

Comment: Delete this change.

JAFNPP Response:

3.6.1.3-13 JFD Bases PA 3
JFD Bases X 10
STS SR3.6.1.3.13 and Associated Bases
ITS SR 3.6.1.3.10 and Associated Bases

STS B3.6.1.3 Bases-SR 3.6.1.3.13 describes a Note 1 that is added to STS SR 3.6.1.3.13. STS SR 3.6.1.3.13 does not contain such a Note, however, BWR 16 justification C.5, approved by the staff, added this Note to STS SR 3.6.1.3.13. It was inadvertently omitted in Revision 1 to the NUREGs. TSB 13 has been generated to correct this problem. ITS B3.6.1.3 Bases SR 3.6.1.3.13 deletes this Note description based on JFD Base X10. JFD Bases X10 is incorrect. JFD Bases PA 3 would be a more appropriate justification for deleting the Note description.

Comment: Provide additional discussion and justification for the deletion of this Note description.

JAFNPP Response:

3.6.1.3-14 JFD Bases DB 8
STS B3.6.1.3 Bases - APPLICABLE SAFETY ANALYSES
ITS B3.6.1.3 Bases - APPLICABLE SAFETY ANALYSES

The third paragraph in STS B3.6.1.3 Bases - APPLICABLE SAFETY ANALYSES discusses Bases for PCIV closure times. The ITS deletes this entire paragraph. The basis for the deletion is discussed in JFD Bases DB 8. The change should not have been a deletion but the discussion in JFD Bases DB 8 should be used in place of the STS words to provide a complete discussion on the APPLICABLE SAFETY ANALYSES for PCIVs with regards to isolation times.

Comment: Revise the ITS markup to substitute the discussion in JFD Bases DB 8 for the deleted STS words.

JAFNPP Response:

3.6.1.3-15 JFD Bases X 3
STS B3.6.1.3 Bases - SR 3.6.1.3.2
ITS B3.6.1.3 Bases - SR 3.6.1.3.1

ITS B3.6.1.3 Bases - SR 3.6.1.3.1 modifies STS B3.6.1.3 Bases - SR 3.6.1.3.2 by deleting the second and third sentences. While the deletion of the third sentence is acceptable, the deletion of the second sentence is not. The second sentence describes what constitutes an inoperable open purge valve with regards to this SR. Thus, it needs to be retained in order to fully describe the intent of the SR.

Comment: Revise the ITS markup to retain the STS sentence.

JAFNPP Response:

3.6.1.6 Reactor Building-to-Suppression Chamber Vacuum Breakers

3.6.1.6-01 DOC M3
JFD X1
JFD Bases DB 5
JFD Bases X2
CTS 4.7.A.4
STS SR 3.6.1.6.3
ITS SR 3.6.1.6.4 and Associated Bases

CTS 4.7.A.4 is modified by the addition of ITS SR 3.6.1.6.4. This addition is justified by DOC M3. DOC M3 states that the addition is ITS SR 3.6.1.6.3. In addition, ITS SR 3.6.1.6.4 has a frequency of 24 months. JFD X1 and JFD Bases X2 states that the frequency change from the STS frequency of I8 months to the ITS frequency of 24 months is justified in DOC M3. DOC M3 does not provide a justification for the 24 months.

Comment: Correct the discrepancy between the CTS/ITS markup and DOC M3 and provide a discussion and justification for the 24 month surveillance frequency.

JAFNPP Response:

3.6.1.6-02 DOC L1
JFD DB1
CTS 3.7.A.4
ITS 3.6.1.6 ACTIONS and Associated Bases

CTS 3.7.A.4.a requires two OPERABLE suppression chamber-reactor building vacuum breakers. ITS LCO 3.6.1.7 requires each vacuum breaker be OPERABLE. Since there are a total of 4 reactor building-to-suppression chamber vacuum breakers this change increases the number required OPERABLE vacuum breakers from 2 to 4. CTS 3.7.A.4.b specifies the ACTIONS to be taken when one of the required two reactor building-to-suppression chamber vacuum breakers is inoperable. Thus the CTS allows plant operation with 2 vacuum breakers

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inoperable and no ACTIONS need to be taken until 3 vacuum breakers become inoperable. The addition of ITS 3.6.1.7 ACTIONS A through D require remedial actions be taken as soon as one out of the four vacuum breakers becomes inoperable. In addition, the justification (DOC L1) states that the CTS fails to make the distinction between loss of function and loss of redundancy and is therefore "unnecessarily conservative." The staff believes that the CTS is less conservative because of this lack of distinction. Thus, all the changes associated with DOC L1, including the addition of the ACTION Note are More Restrictive changes rather than Less Restrictive changes.

Comment: Revise the CTS markup and provide discussion and justification for these More Restrictive changes.

JAFNPP Response:

3.6.1.6-03 JFD Bases DB3
STS B3.6.1.7 Bases - APPLICABILITY
ITS B3.6.1.6 Bases - APPLICABILITY

STS B3.6.1.7 Bases - APPLICABILITY justifies the OPERABILITY of the reactor building-to-chamber suppression chamber vacuum breakers in MODES 1, 2, and 3. Two conditions related to excessive negative pressure necessitate this MODE applicability, an inadvertent actuation of the Suppression Pool Spray System and depressurization of the drywell. ITS B3.6.1.6 Bases APPLICABILITY states that depressurization of the drywell could occur due to a DBA. All mention of inadvertent actuation of the RHR Containment Spray System has been deleted or severely modified. JFD Bases DB3 states that inadvertent actuation of the RHR Containment Spray System is not the main concern. The justification does not adequately address this deletion since it implies that it is a concern in drywell depressurization, just not the main concern. In addition, the change could be considered a potential generic change.

Comment: Provide additional justification and discussion for this deletion based on current licensing bases, system design or operational constraints.

JAFNPP Response:

3.6.1.7 Suppression Chamber-to-Drywell Vacuum Breakers

3.6.1.7-01 DOC M1
JFD CLB1
JFD Bases CLB1
CTS 4.7.A.5
STS SR 3.6.1.8.1 and Associated Bases
ITS SR 3.6.1.7.1 and Associated Bases

CTS 4.7.A.5 is modified by the addition of a new surveillance requirement (ITS SR 3.6.1.7.1). Since the CTS does not have a similar SR the change is a More Restrictive change. ITS SR 3.6.1.7.1 which is based on STS SR 3.6.1.8.1 modifies the STS frequencies by deleting the frequency "and within 2 hours after any discharge..reduced by ≥ [0.5] psid." The justifications

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for this deletion JFD CLB1 and JFD Bases CLB1 implies that the SR and the associated ITS frequency is based on the retention of existing requirements/current licensing basis. If the addition of the SR is a new surveillance per DOC M1 then there is no existing requirements to justify the deletion of the second STS frequency. In addition the discussion provided in JFD CLB1 and JFD Bases CLB1 to delete the frequency can apply to any BWR/4 suppression chamber-to-drywell vacuum breaker. Thus the staff finds the change to be generic and beyond the scope of review for this conversion **(BSCR)**.

Comment: Delete this generic change.

JAFNPP Response:

3.6.1.7-02 DOC M3
JFD X1
JFD Bases DB6
JFD Bases X2
CTS 3.7.A.5.g
STS 3.6.1.8 ACTION B and Associated Bases
ITS 3.6.1.7 ACTION B and Associated Bases

CTS 3.7.A.5.g imposes limitations if one suppression chamber-to-drywell vacuum breaker is made or found to be inoperable for any reason. CTS 3.7.A.5.g is modified to address the condition of one suppression chamber-to-drywell vacuum breaker not closed (ITS 3.6.1.7 ACTION B). This change is considered as a More Restrictive change in which the staff agrees. However, as part of this change ITS 3.6.1.7 ACTION B has a Completion Time of 12 hours. The STS for this similar condition (STS 3.6.1.8 ACTION B) has a Completion Time of 2 hours. The justification provided (JFD X1, JFD Bases DB6, and JFD Bases X2) to justify the additional time (10 hours)) is that adequate time is needed to prepare and perform the leakage test of STS SR3.6.1.1.2/ITS SR 3.6.1.1.2. The staff finds that the STS Completion Time of 2 hours is adequate in light of the safety concern associated with an open vacuum breakers (breach of containment). In addition, the staff finds that the change is generic and beyond the scope of review for this conversion **(BSCR)**.

Comment: Delete this generic change.

JAFNPP Response:

3.6.1.7-03 DOC L3
JFD Bases DB3
CTS 3.7.A.5.b
ITS B3.6.1.7 Bases-SR 3.6.1.7.1

CTS 3.7.A.5.b states that "One drywell suppression chamber vacuum breaker may be non-fully closed so long as it is determined to be not more than 1° open as indicated by the position lights." The CTS markup indicates and DOC L3 states that this requirement has been deleted. This is incorrect. This OPERABILITY requirement on what constitutes a closed valve has been

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relocated to ITS B3.6.1.7 Bases - SR 3.6.1.7.1 as "Insert SR 3.6.1.7.1." Thus this change is a Less Restrictive (LA) change rather than a Less Restrictive (L) change.

Comment: Revise the CTS markup and provide a discussion and justification for this Less Restrictive (LA) change.

JAFNPP Response:

3.6.1.7-04 JFD PA2
JFD Bases PA3
CTS 3.7.A.5.f
CTS 4.7.A.5.g
STS SR 3.6.1.8.3 and Associated Bases
ITS SR 3.6.1.7.3 and Associated Bases

CTS 3.7.A.5.f and 4.7.A.5.g specify that the self actuated vacuum breakers shall "open" when subjected to a force equivalent to 0.5 psid acting on the valve disc. The corresponding STS SR is STS SR 3.6.1.8.3. ITS SR 3.6.1.7.3 modifies the STS to require the verification of the "full open" setpoint rather than the CTS/STS requirement of "opening setpoint". This change is characterized in the ITS as an editorial clarification (JFD PA2 and JFD Bases PA3). This is incorrect. There is a technical difference between CTS/STS requirement of being capable of opening or starting to open at a set pressure versus the ITS requirement of being fully open at a set pressure. The staff considers this change to be a More Restrictive change.

Comment: Revise the CTS markup and provide a discussion and justification for this More Restrictive change.

JAFNPP Response:

3.6.1.7-05 JFD Bases PA3
JFD Bases DB4
STS B3.6.1.8 Bases - APPLICABILITY
ITS B3.6.1.7 Bases - APPLICABILITY

See Comment Number 3.6.1.6-3.

Comment: See Comment Number 3.6.1.6-3.

JAFNPP Response:

3.6.1.7-06 JFD Bases DB2
STS B3.6.1.8 Bases - LCO
ITS B3.6.1.7 Bases - LCO

The first two sentences of STS B3.6.1.8 Bases - LCO states the following: "Only [9] of the [12] vacuum breakers must be OPERABLE for opening. All suppression chamber-to-drywell vacuum breakers, however, are required...their intended design function." ITS B3.6.1.7 Bases-LCO modifies these sentences as follows: "All vacuum breakers must be OPERABLE." The ITS deletes the words "for opening. All...design function." The basis for this deletion JFD Bases DB2 states that the "change is consistent with the format of ITS 3.6.1.7 for reactor building-to-suppression chamber vacuum breakers." This is incorrect. First, the ITS reference is wrong; it should be ITS 3.6.1.6 even though ITS B3.6.1.6 Bases-LCO is worded slightly different, the deleted ITS B3.6.1.7 Bases-LCO words are in ITS B3.6.1.6 Bases -LCO. In addition, the deleted words define what constitutes an OPERABLE vacuum breaker and need to be retained in this section which defines OPERABILITY.

Comment: Delete this change.

JAFNPP Response:

3.6.1.9 Residual Heat Removal (RHR) Containment Spray System

3.6.1.9-01 DOC A.1
CTS 3/4.5.B
STS 3.6.1.7 and Associated Bases
ITS 3.6.1.9 and Associated Bases

CTS 3/4.5.B has been converted into the Improved Technical Specifications requirements using the guidance of NUREG-1434 for STS 3.6.1.7, Residual Heat Removal (RHR) Spray System. DOC A.1 states that this ITS is based upon the guidance provided in NUREG-1433 which contradicts with the presentation of the ITS markup.

Comment: Revise the DOC A.1 to be consistent.

JAFNPP Response:

3.6.1.9-02 DOC M2
DOC LA1
DOC L4
JFD PA1
JFD Bases PA1
JFD Bases PA2
CTS 3.5.B.1
CTS 4.5.B.1.a
ITS LCO 3.6.1.9 SR 3.6.1.9.2 and Associated Bases

CTS 3.5.B.1 states that both RHR containment spray subsystems shall be OPERABLE and that each subsystem contains two (2) RHR pumps and 2 RHR service water pumps. CTS 4.5.B.1.a requires for each pump an operability and flow rate test. The CTS markup of CTS 3.5.B.1 shows that the details concerning the number of pumps required for an OPERABLE subsystem has been relocated to the Bases by DOC LA1. This is incorrect. The ITS markup for ITS SR

3.6.1.9.2, ITS B3.6.1.9 Bases - BACKGROUND, ITS B3.6.1.9 Bases-LCO and ITS B3.6.1.9 Bases SR 3.6.1.9.2 states that only one RHR pump per subsystem is required to be OPERABLE and only tests that one "required" RHR pump. This is not in accordance with the current licensing basis as stated in CTS 3.5.B.1 and 4.5.B.1.a. In addition, no justification is provided in the CTS markup to indicate this change. The staff considers this total change to be a beyond scope of review item for this conversion **(BSCR)**. This concern is also applicable to ITS 3.6.2.3. See Comment Number 3.6.2.3-01.

Comment: Revise the ITS markup to bring it into conformance with the CTS and provide any appropriate discussions and justifications for these changes. See Comment Number 3.6.2.3-01.

JAFNPP Response:

3.6.1.9-03 DOC LA2
CTS 4.5.B.1.b
ITS 5.5.8

The CTS markup of CTS 4.5.B.1.b shows that the entire specification is being relocated to the Inservice Testing Program (DOC LA2). This relocation designation is incorrect. CTS 4.5.B.1.b is incorporated into ITS 5.5.8. Thus the CTS markup should reflect that these requirements have been moved to ITS 5.5.8 and that this is an Administrative change (movement within the TS) rather than a Less Restrictive (LA) change. This concern is also applicable to ITS 3.6.2.3. See Comment Number 3.6.2.3-02.

Comment: Revise the CTS markup of CTS 4.5.B.1.b to show that it has been moved to ITS 5.5.8 and provide the appropriate discussion and justification for this Administrative change. See Comment Number 3.6.2.3-02.

JAFNPP Response:

3.6.1.9-04 DOC LA3
CTS 4.5.B.1.f
ITS SR 3.6.1.9.3 and Associated Bases

CTS 4.5.B.1.f requires that the containment headers and spray nozzles are verified to be unobstructed. The corresponding ITS SR is ITS SR 3.6.1.9.3. The details on the method used to perform this verification (i.e., an air test) is according to DOC LA3 relocated to the Bases. The staff cannot find this detail in the Bases for ITS 3.6.1.9.

Comment: Revise the ITS markup to include this detail.

JAFNPP Response:

3.6.1.9-05 DOC L1

CTS 4.5.B.3

CTS 4.5.B.3 requires that the redundant containment cooling subsystem be verified to be OPERABLE immediately and daily thereafter when one containment cooling subsystem becomes inoperable. The CTS markup shows this requirement as being deleted and indicates that it is a Less Restrictive (L) change. This is incorrect. The discussion provided for DOC L1 indicates that the change is an Administrative change, rather than a Less Restrictive (L) change. This change is the equivalent to the Administrative change of the deletion of restore an inoperable item to OPERABLE status. It is implicit within the CTS and ITS. The change would be considered a Less Restrictive (L) change if verify meant perform all surveillance tests or demonstrate subsystem OPERABILITY. However, the staff believes that verify is an administrative verification (paper check) of system OPERABILITY which is implicit in the structure of the CTS/ITS. This concern is also applicable to ITS 3.6.2.3. See Comment Number 3.6.2.3-03.

Comment: Revise the CTS markup and provide a discussion and justification for this Administrative change. See Comment Number 3.6.2.3-03.

JAFNPP Response:

3.6.1.9-6 JFD PA 2
JFD Bases PA2
JFD Bases PA3
STS SR 3.6.1.7.1 and Associated Bases
ITS SR 3.6.1.9.1 and Associated Bases

ITS SR 3.6.1.9.1 modifies STS SR 3.6.1.7.1 by deleting the SR Note on system alignment in MODE 3 and adds the phrase "or can be aligned to the correct position." The details of the SR Note have been relocated to ITS B3.6.1.9 Bases-LCO. The justification for this change (JFD PA2, JFD Bases PA2 and JFD Bases PA 3) states that the change is made to be consistent with the format of STS SR 3.6.2.3.1 and ITS B3.6.2.3 Bases-LCO. See Comment Number 3.6.2.3-5 for additional concerns with regards to the changes to ITS B3.6.2.3 Bases-LCO. STS SR 3.6.2.3.1 has the same wording in both NUREG-1433 and 1434. ITS SR 3.6.1.9.1 is based on NUREG-1434 (STS SR 3.6.1.7.1). Thus basing a change on format consistency when both NUREGs have the same wording is unacceptable and a better justification would need to be provided. In addition, based on the changes made, the staff considers this change as generic and beyond the scope of review for this conversion **(BSCR)**.

Comment: Delete this generic change. See Comment Number 3.6.2.3-05.

JAFNPP Response:

3.6.2.1 Suppression Pool Average Temperature

3.6.2.1-01 DOC A.2
CTS 3.7.A.1.c.(2)
CTS 3.7.A.8

ITS 3.6.2.1 ACTION C and Associated Bases

CTS 3.7.A.1.c.(2) allows the suppression pool normal power operation temperature limit of 95°F to be exceeded by no more than 10°F during testing which adds heat to the suppression pool. The CTS markup shows that ITS 3.6.2.1 ACTION C has been added to CTS 3.7.A.1.c(2), and that the change is considered as Administrative (DOC A2). DOC A2 states that the change clarifies that if the temperature exceeds 105°F, testing that adds heat to the suppression pool must be immediately suspended and that the current requirements imply this. This is incorrect. If the limits specified in CTS 3.7.A.1.c.(2) are exceeded then the requirements of CTS 3.7.A.8 apply which requires a shutdown to cold shutdown within 24 hours. The addition of ITS ACTION C as well as ITS 3.6.2.1 ACTION A would allow an additional 24 hours before the shutdown begins. Thus the change would be a Less Restrictive (L) change rather than an Administrative change. See Comment Number 3.6.2.1-06.

Comment: Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change. See Comment Number 3.6.2.1-06.

JAFNPP Response:

3.6.2.1-02 DOC A5
DOC M2 (ITS 3.6.2.2)
CTS 3.7.A.1
ITS 3.6.2.1 APPLICABILITY and Associated Bases
JTS 3.6.2.2 APPLICABILITY and Associated Bases

CTS 3.7.A.1 specifies the APPLICABILITY for both suppression pool average temperature and water level. The CTS APPLICABILITY is the same for both. In the IT'S THE APPLICABILITY is also the same for both ITS 3.6.2.1 and ITS 3.6.2.2. However, the CTS markup for ITS 3.6.2.1 show the APPLICABILITY change as Administrative while for ITS 3.6.2.2 it shows the change as More Restrictive. Based on the discussions in DOC A5 and M2 (ITS 3.6.2.2) the staff concludes that the changes should be More Restrictive for both specifications. See Comment Number 3.6.2.2-01.

Comment: Correct this discrepancy. See Comment Number 3.6.2.2-01.

JAFNPP Response:

3.6.2.1-03 DOC L3
CTS 4.7.A.1

CTS 4.7.A.1 requires an external visual inspection of the suppression chamber whenever there is indication of relief valve operation with the local suppression pool temperature ≥ 160°F and RCS pressure ≥ 200 psig. DOC L3 states that ITS 3.6.2.1 does not retain this CTS requirement in accordance with NEDO-30832, "Elimination of Limit on BWR Suppression Pool Temperature for SRV Discharge with Quenchers," dated December 1984. The discussion and justification do not indicate if NEDO-30832 has been reviewed and approved by the staff for its

applicability to JAFNPP. This item may be considered a beyond scope of review item for this conversion since its applicability to JAFNPP may not have been approved by the staff.

Comment: Provide additional discussion and justification to show that NEDO - 30832 has been reviewed by the staff and found to be acceptable for use at JAFNPP.

JAFNPP Response:

3.6.2.1-04 JFD Bases PA4
STS B3.6.2.1 Bases - D.1 and D.2
ITS B3.6.2.1 Bases - D.1, D.2 and D.3

STS B3.6.2.1 Bases - D.1 and D.2 uses the phrase "In this Condition..." ITS B3.6.2.1 Bases - D.1, D.2 and D.3 decapitalizes the "C" in "Condition" and justifies it as a typographical or editorial change. This is incorrect. The condition referred to in the sentence is Condition D and not the system operating or physical condition. Therefore, it should be "Condition" rather than "condition".

Comment: Correct this discrepancy.

JAFNPP Response:

3.6.2.1-05 JFD Bases DB3
STS B3.6.2.1 Bases - SR3.6.2.1.1
ITS B3.6.2.1 Bases - SR3.6.2.1.1

STS B3.6.2.1 states the following: "The average temperature is determined by taking an arithmetic average of OPERABLE suppression pool water temperature channels." The ITS modifies this sentence by deleting the word "OPERABLE". Insufficient justification is provided for this deletion.

Comment: Provide additional discussion and justification on this deletion.

JAFNPP Response:

3.6.2.1-06 CTS 3.7.A.1.c.(2)
ITS 3.6.2.1 ACTION A

CTS 3.7.A.1.c.(2) allow the suppression pool normal operational temperature limit of 95°F to be exceeded by no more than 10°F during testing which adds heat to the suppression pool. CTS 3.7.A.1.c.(2) also states the following: "In connection with such testing, the pool temperature must be reduced to below the normal power operation limit specified in (1) above with 24 hours." The CTS markup shows this statement as being part of ITS 3.6.2.1 ACTION A. The staff does not believe this is the correct change. Based on the structure of the paragraph and

the words in the sentence, the staff interprets the above statement to mean that during testing which adds heat to the suppression pool, one is allowed to remain between 95°F and 105°F for only 24 hours. If one exceeds the time limit or temperature limit then a shutdown per CTS 3.7.A.8 is required. In the ITS during testing which adds heat to the suppression pool, there is no time limit specified for this condition only a temperature limit. Thus the CTS statement is not associated with ITS 3.6.2.1 ACTION A, but is deleted for the CTS. Therefore, the change would be a Less Restrictive (L) change. See Comment Number 3.6.2.1-01.

Comment: Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change. See Comment Number 3.6.2.1-01.

JAFNPP Response:

3.6.2.2 Suppression Pool Water Level

3.6.2.2-01 DOC A5 (ITS 3.6.2.1)
DOC M2
CTS 3.7.A.1
ITS 3.6.2.1 APPLICABILITY and Associated Bases
ITS 3.6.2.2 APPLICABILITY and Associated Bases

See Comment Number 3.6.2.1-02.

Comment: See Comment Number 3.6.2.1-02.

JAFNPP Response:

3.6.2.3 Residual Heat Removal (RHR) Suppression Pool Cooling

3.6.2.3-01 DOC M1
DOC LA1
DOC L2
JFD PA2
CTS 3.5.B.1
CTS 4.5.B.1.a
ITS LCO 3.6.2.3, SR 3.6.2.3.2 and Associated Bases

See Comment Number 3.6.1.9-2. In addition, the change proposed for ITS SR 3.6.2.3.2 can be considered as generic.

Comment: See Comment Number 3.6.1.9-02. Delete the generic change.

JAFNPP Response:

3.6.2.3-02 DOC LA2
CTS 4.5.B.1.b
ITS 5.5.8

See Comment Number 3.6.1.9-03.

Comment: See Comment Number 3.6.1.9-03.

JAFNPP Response:

3.6.2.3-03 DOC L1
CTS 4.5.B.3

See Comment Number 3.6.1.9-05.

Comment: See Comment Number 3.6.1.9-05.

JAFNPP Response:

3.6.2.3-04 JFD X1
JFD Bases X2
STS 3.6.2.3 ACTION B and Associated Bases
ITS 3.6.2.3 ACTIONS B, C and Associated Bases

STS3.6.2.3 ACTION B requires a shutdown if the Required Actions and Associated Completion Time of Condition A is not met or two RHR suppression pool cooling subsystems are inoperable. ITS 3.6.2.3 breaks STS 3.6.2.3 ACTION B up into two separate Conditions and allows an 8 hour Completion Time to restore one RHR suppression pool cooling subsystem to OPERABLE status. This change is justified by JFD X1 and JFD Bases X2 is not in accordance with TSTF-230.

Comment: Revise the ITS mark for ITS 3.6.2.3 ACTIONS B, C and their Associated Bases to bring them into conformance with TSTF-230.

JAFNPP Response:

3.6.2.3-05 JFD Bases PA2
STS B3.6.2.3 Bases-LCO
ITS B3.6.2.3 Bases-LCO

ITS B3.6.2.3 Bases-LCO adds "Insert LCO" to STS B3.6.2.3 Bases-LCO which defines RHR Suppression Pool Cooling System OPERABILITY in MODE 3. The justification used to add this insert (JFD Bases PA2) states the addition is for enhanced clarity or consistency with other Bases. Since this paragraph is not currently in either NUREG 1433 or 1434, the change would

modify the OPERABILITY of this system in MODE 3 and would apply to all BWR-4 and BWR-6 plants. Therefore, this change for this specification is considered as generic and beyond the scope of review for this conversion **(BSCR)**. See Comment Number 3.6.1.9-06.

Comment: Delete this generic change.

JAFNPP Response:

3.6.2.3-06 JFD Bases PA3
STS B3.6.2.3 Bases-A.1
ITS B3.6.2.3 Bases-A.1

See Comment Number 3.6.2.1-04.

Comment: See Comment Number 3.6.2.1-04.

JAFNPP Response:

S3.6.2.4 Residual Heat Removal (RHR) Suppression Pool Spray

S3.6.2.4-01 JFD DB1
JFD Bases CLB1
JFD Bases DB1
STS 3.6.2.4 and Associated Bases

STS 3.6.2.4 and its Associated Bases is not included in the ITS for JAFNPP. The justifications for this deletion are JFD DB1 and JFD Bases DB1. While the deletion of this specification is acceptable, the ITS markup of the Bases shows a JFD Bases CLB1 also associated with the deletion. No justification for JFD Bases CLB1 is provided.

Comment: Correct this discrepancy.

JAFNPP Response:

3.6.3.1 Primary Containment Oxygen Concentration

3.6.3.1-01 JFD Bases DB1
JFD Bases DB2
STS B3.6.3.3 Bases - BACKGROUND
ITS B3.6.3.1 Bases - BACKGROUND

STS B3.6.3.3 Bases - BACKGROUND states that the capability to inert the primary containment and maintain oxygen concentration limits is dependent on the Drywell Cooling System fans. ITS B3.6.3.1 Bases - BACKGROUND deletes all references to the Drywell

Cooling System fans. This is unacceptable. Resolution of this item is dependent on resolution of Comment Number S3.6.3.2-01.

Comment: See Comment Number 3.6.3.2-01.

JAFNPP Response:

3.6.3.2 Drywell Cooling System Fans

3.6.3.2-01 JFD DB1
JFD Bases DB1
JFD Bases DB1 (ITS 3.6.3.1)
STS 3.6.3.2 and Associated Bases

STS 3.6.3.2, Drywell Cooling System Fans is deleted from the ITS. The discussion and justification (JFD DB1 and JFD Bases DB1) for deleting Drywell Cooling System fans states that the specification "is being deleted because no comparable system exists for post accident drywell atmosphere mixing at JAFNPP." This statement is incorrect. JFD Bases DB1 (ITS 3.6.3.1) states that this system does exist at JAFNPP. It also states that the JAFNPP specific analysis does not assume Drywell Cooling System fans are available to assure adequate mixing. However, the Bases for STS 3.6.3.2 APPLICABLE SAFETY ANALYSIS states that hydrogen is released to the drywell within 2 minutes following a DBA LOCA. Natural circulation phenomena results in a gradient concentration difference in the drywell and suppression chamber. "Even though this gradient is acceptably small and no credit for mechanical mixing was assumed in the analysis, two [Drywell Cooling System fans] are [required] be OPERABLE (typically four to six fans are required to keep the drywell cool during operation in MODE 1 or 2) by this LCO." The staff has determined that this system meets Criterion 3 of 10 CFR 50.36(c)(2)ii)(C). Thus, in light of the STS Bases discussion, JFD DB1, JFD Bases DB1, and JFD Bases DB1 (ITS 3.6.3.1) are inaccurate and incomplete.

Comment: Provide additional justification and discussion for the STS deviation based on current licensing basis, system design or operations constraints, or retain STS 3.6.3.2 and Associated Bases.

JAFNPP Response:

3.6.4.1 Secondary Containment

3.6.4.1-01 DOC A5
CTS 3.7.C.1
CTS 3.7.C.2
ITS 3.6.4.1 Required Action C.1 Note and Associated Bases

CTS 3.7.C.2 requires that when secondary containment integrity cannot be met within 24 hours then all conditions specified in CTS 3.7.C.1 must be met. The CTS is modified by the addition of ITS 3.6.4.1 Required Action C.1 Note which states that if secondary containment is inoperable during movement of irradiated fuel assemblies ITS LCO 3.0.3 is not applicable. This

change is characterized as an Administrative change (DOC A5). This is incorrect. The CTS requires all 4 conditions of CTS 3.7.C.1 to be met if secondary containment is inoperable. Therefore, if secondary containment is inoperable during movement of irradiated fuel and the plant is in MODES 1, 2, and 3, then the CTS requires a shutdown (CTS 3.7.C.1.a and CTS 3.7.C.1.b must be met) as well as the suspension of irradiated fuel assembly movement (CTS 3.7.C.1.d) within 24 hours. If secondary containment is inoperable during movement of irradiated fuel and the plant is in cold shutdown, then CTS 3.7.C.1.a and CTS 3.7.C.1.b are already met and only CTS 3.7.C.1.d needs to be met within 24 hours. As stated in ITS B3.6.4.1 Bases C.1, C.2 and C.3 "The inability to suspend movement of irradiated fuel assemblies would not be a sufficient reason to require a reactor shutdown." Thus the Note is added to ITS 3.6.4.1 Required Action C.1, which would make the CTS change a Less Restrictive (L) change since a shutdown would be required by the CTS. See Comment Numbers 3.6.4.2-02, and 3.6.4.3-04.

Comment: Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change. See Comment Numbers 3.6.4.2-02, and 3.6.4.3-04.

JAFNPP Response:

3.6.4.2 Secondary Containment Isolation Valves (SCIVs)

3.6.4.2-01 DOC A3
CTS 3.7.C.1
CTS 3.7.C.2
ITS 3.6.4.2 ACTIONS Note 2 and Associated Bases

CTS 3.7.C.2 is modified by the addition of ITS 3.6.4.2 ACTIONS Note 2, which allows separate Condition entry for each penetration flow path. The change is justified in the CTS by DOC A3. DOC A3 discusses the application of the Note as it applies to the ITS not the CTS. The staff cannot determine based on the CTS wording and DOC A3 that the addition of this Note is an Administrative change to the CTS. The staff concludes based on the wording of CTS 3.7.C.1 and 3.7.C.2 that separate Condition entry is not allowed in the CTS and thus the addition of this Note is a Less Restrictive (L) change.

Comment: Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change.

JAFNPP Response:

3.6.4.2-02 DOC A5
CTS 3.7.C.1
CTS 3.7.C.2
ITS 3.6.4.2 Required Action D.1 Note and Associated Bases

See Comment Number 3.6.4.1-01 and 3.6.4.3-04.

Comment: See Comment Numbers 3.6.4.1-01 and 3.6.4.3-04.

JAFNPP Response:

3.6.4.2-03 DOC L6
CTS Table 3.10-2 Note(f)
ITS 1.0 LOGIC SYSTEM FUNCTIONAL TEST

The CTS markup shows that the details in CTS Table 3.10-2 Note(f) identifying how the LOGIC SYSTEM FUNCTIONAL TEST is to be performed (i.e., using the test jacks) has been deleted. This deletion is justified by DOC L6. The discussion provided in DOC L6 indicates that this information is not really deleted but encompassed by the definition of LOGIC SYSTEM FUNCTIONAL TEST in ITS 1.0. Therefore, the change would be considered as an Administrative change rather than a Less Restrictive (L) change.

Comment: Revise the CTS markup and provide a discussion and justification for this Administrative change.

JAFNPP Response:

3.6.4.2-04 JFD Bases PA3
STS B3.6.4.2 Bases - APPLICABILITY
ITS B3.6.4.2 Bases - APPLICABILITY

The last sentence in STS B3.6.4.2 Bases - APPLICABILITY states that "Moving irradiated fuel assemblies in the [secondary] containment may also occur in MODES 1, 2, and 3." ITS B3.6.4.2 Bases - APPLICABILITY deletes this sentence based on the reason that MODE 1, 2, and 3 operation is justified in the previous paragraph of the APPLICABILITY. This is not entirely correct since that paragraph deals with secondary containment OPERABILITY with regards to primary containment leakage as a result of a DBA. The deleted statement states that irradiated fuel movement can occur in MODES 1, 2, and 3, as well as MODES 4 and 5 which is not addressed in the previous APPLICABILITY paragraph.

Comment: Delete this change.

JAFNPP Response:

3.6.4.2-05 JFD Bases PA5
STS B3.6.4.2 Bases - A.1 and A.2, and SR 3.6.4.2.1
ITS B3.6.4.2 Bases - A.1 and A.2, and SR 3.6.4.2.1

See Comment Numbers 3.6.1.2-05 and 3.6.1.3-11.

Comment: See Comment Numbers 3.6.1.1-05 and 3.6.1.3-11

JAFNPP Response:

:

3.6.4.2-06 JFD Bases X3
JFD Bases X4
ITS B3.6.4.2 Bases - LCO

ITS B3.6.4.2 Bases - LCO is modified to reflect that the SCIVs isolation times are included in the Inservice Testing Program. This change in the ITS markup is designated as JFD Bases X4. No discussion or justification for JFD Bases X4 is provided. However, the discussion and justification provided for JFD Bases X3 seems to cover this change.

Comment: Correct this discrepancy.

JAFNPP Response:

3.6.4.3 Standby Gas Treatment (SGT) System

3.6.4.3-01 DOC A4
JFD CLB3
JFD Bases CLB3
CTS 4.7.B.1.e
ITS SR 3.6.4.2.4 and Associated Bases

CTS 4.7.B.1.e requires that manual operability of the bypass valve for filter cooling shall be demonstrated once per 24 months. The corresponding ITS SR is ITS SR 3.6.4.3.4 which requires verifying the SGT System filter cooling cross tie valves are open. There are a number of changes made to the CTS SR in order to arrive at the ITS SR wording. All the changes are considered and described as Administrative changes (DOC A4, JFD CLB3, and JFD Bases CLB3). This is incorrect. The changes associated with the manual operability of the valve and the addition of the ITS SR Note are discussed in Comment Numbers 3.6.4.3-02 and 3.6.4.3-03 respectively. There is a nomenclature change from "bypass valve for filter cooling" to "SGT System filter cooling cross tie valves". Based on similar nomenclature changes on other conversions, it is difficult to determine from the Bases discussions if the "bypass" valves are the same as the "cross tie" valves since the terminology "bypass" and "cross tie" imply two different types of designs. "Bypass" connotates going around a component(s) whereas "cross tie" connotates connecting two trains or two similar components.

Comment: Provide a simplified PID of the SGT System showing all valves. Indicate the valves to be tested by the CTS/ITS SR. If the valves specified in the CTS are different from the ITS valves, provide a discussion and justification for this Less Restrictive (L) change. See Comment Numbers 3.6.4.3-02 and 3.6.4.3-03.

JAFNPP Response:

3.6.4.3-02 DOC A4
JFD CLB3
JFD Bases CLB3

CTS 4.7.B.1.e
STS SR 3.6.4.2.4 and Associated Bases
ITS SR 3.6.4.2.4 and Associated Bases

CTS 4.7.B.1.e requires that manual operability of the bypass valve for filter cooling shall be demonstrated once per 24 months. The corresponding ITS SR is ITS SR 3.6.4.3.4 which requires verifying the SGT System filter cooling cross tie valves are open. There are a number of changes made to the CTS SR in order to arrive at the ITS SR wording. All the changes are considered and described as Administrative changes (DOC A4, JFD CLB 3, and JFD Bases CLB 3). This is incorrect. The changes associated with the valve nomenclature and the addition of the ITS SR Note are discussed in Comment Numbers 3.6.4.3-01 and 3.6.4.3-03 respectively. CTS 4.6.B.1.e requires demonstrating manual operability of the valves which implies operating or stroking the valve. The ITS only verifies that the valve is open. STS SR 3.6.4.3.4 excluding fan starting would more accurately be a reflection of the CTS requirements of opening and closing the valve. Thus, the change to the CTS would be Administrative only if the STS words were used. Thus the proposed ITS change would be considered as a Less Restrictive (L) change.

Comment: Revise the CTS/ITS markups as appropriate and provide the appropriate discussion and justification for this change. See Comment Numbers 3.6.4.3-01 and 3.4.3.3-02.

JAFNPP Response:

3.6.4.3-03 DOC A4
JFD CLB 3
JFD Bases CLB 3
CTS 4.7.B.1.e
ITS SR 3.6.4.2.4 and Associated Bases

CTS 4.7.B.1.e requires that manual operability of the bypass valve for filter cooling shall be demonstrated once per 24 months. The corresponding ITS SR is ITS SR 3.6.4.3.4 which requires verifying the SGT System filter cooling cross tie valves are open. There are a number of changes made to the CTS SR in order to arrive at the ITS SR wording. All the changes are considered and described as Administrative changes (DOC A4, JFD CLB3, and JFD Bases CLB3). This is incorrect. The changes associated with the valve nomenclature and manual operability of the valve are discussed in Comment Numbers 3.6.4.3-01 and 3.6.4.3-02 respectively. CTS 4.7.B.1.e is modified by a Note which exempts performance of ITS SR 3.6.4.3.4 when one SGT subsystem is isolated. The CTS does not currently allow this exemption. Thus the addition of the Note would be a Less Restrictive (L) change. In addition insufficient information is provided to make a determination that the addition of the Note is plant specific. There is the potential that this change is generic and thus beyond the scope of review for this conversion.

Comment: Revise the CTS markup and provide a discussion and justification for this Less Restrictive (L) change based on plant specific system design or operational constraints.

JAFNPP Response:

3.6.4.3-04 DOC M5
CTS 3.7.B.1
CTS 3.7.B.2
CTS 3.7.B.3
ITS 3.6.4.3 Required Action C Note, Required Action E.1 Note and Associated Bases

See Comment Number 3.6.4.1-1. In addition the CTS requirements referenced above seem to be very close to the CTS requirements discussed in Comment Numbers 3.6.4.1-1 and 3.6.4.2-2, yet the change, which is the same in all three cases, is characterized different. It is Administrative in Comment Numbers 3.6.4.1-01 and 3.6.4.2-02 and More Restrictive here.

Comment: See Comment Numbers 3.6.4.1-01 and 3.6.4.2-02. In addition, clarify the discrepancy.

JAFNPP Response:

3.6.4.3-05 DOC L1
DOC L2
CTS 3.7.B.3
CTS 4.7.B.2
ITS 3.6.4.3 Required Action C.1 and Associated Bases

CTS 3.7.B.3 is modified by the addition of ITS 3.6.4.3 Required Action C.1 which allows placing the OPERABLE SGT subsystem in operation in lieu of the performing the other CTS requirements for an inoperable SGT subsystem during movement of irradiated fuel assemblies in secondary containment, during CORE ALTERATIONS and during OPDRVs. CTS 4.7.B.2 requires that when one circuit of the SGT system becomes inoperable the OPERABLE circuit shall be verified to be OPERABLE immediately and daily thereafter. By adding ITS 3.6.4.3 Required Action C.1, one is meeting the requirements of CTS 4.7.B.2. by operating the system which verifies OPERABILITY. Thus CTS 4.7.B.2 is associated with the addition of ITS 3.6.4.3 Required Action C.1 and would be an Administrative change in this situation. See Comment Number 3.6.4.3-06 for additional concerns with regards to CTS 4.7.B.2.

Comment: Revise the CTS markup and provide a discussion and justification for this Administrative change.

JAFNPP Response:

3.6.4.3-06 DOC L2
CTS 4.7.B.2

See Comment Number 3.6.1.9-05.

Comment: See Comment Number 3.6.1.9-05.

JAFNPP Response:

3.6.4.3-07 DOC L5
CTS Table 3.10-2 Note f
ITS 1.0 LOGIC SYSTEM FUNCTION TEST

See Comment Number 3.6.4.2-03.

Comment: See Comment Number 3.6.4.2-03.

JAFNPP Response:

3.6.4.3-08 JFD Bases PA3
STS B3.6.4.3 Bases - A.1
ITS B3.6.4.3 Bases - A.1

See Comment Number 3.6.2.1-04.

Comment: See Comment Number 3.6.2.1-04.

JAFNPP Response:

3.7.A.3 Containment Purge Through Standby Gas Treatment System

3.7.A.3-01 DOC R1
CTS 3.7.A.3
CTS 3.7.A.8

The CTS markup shows that CTS 3.7.A.3 is being relocated out of the JAFNPP TS by DOC R1. DOC R1 states that "The CTS 3.7.A.3 LCO and associated surveillance requirement,...is proposed to be relocated to the Offsite Dose Calculator Manual (OCDM)." The CTS markup and DOC R1 are incorrect and/or incomplete. DOC R1 states that there is an "associated surveillance requirement", but the CTS markup does not include this surveillance requirement. In addition CTS 3.7.A.8, primary containment shutdown requirements, is directly associated with CTS 3.7.A.3 and needs to be included as part of this specification relocation. See Comment Numbers 3.6.1.3-06 and 3.7.A.3-02 for additional concerns with regards to relocation this specification.

Comment: Revise the CTS markup and provide additional discussions and justifications for surveillance and shutdown requirements associated with CTS 3.7.A.3. See Comment Numbers 3.6.1.3-06 and 3.7.A.3-02.

JAFNPP Response:

3.7.A.3-02 DOC R1

CTS 3.7.A.3
ITS SR 3.6.1.3.1 and Associated Bases

CTS 3.7.A.3 states that "The containment shall be purged through the Standby Gas Treatment System whenever the primary containment integrity is required." Based on the CTS and the ITS markup, the staff does not conclude that CTS 3.7.A.3 can be relocated out of the JAFNPP TS. CTS 3.7.A.3 has a direct relationship to the OPERABILITY of the containment vent and purge valves, in that purging shall be through the SGT System. If purging cannot be through the SGT System then based on CTS 3.7.A.3 the vent and purge valves need to be closed. Thus CTS 3.7.A.3 needs to be retained in ITS SR 3.6.1.3.1 either as part of Note 1 or as a separate Note.

Comment: Revise the CTS/ITS markups and provide, as appropriate, additional discussion and justification adding CTS 3.7.A.3 to ITS SR 3.6.1.3.1.

JAFNPP Response:

SECTION 3.8, ELECTRICAL POWER SYSTEMS

3.8.1, AC Sources - Operating

3.8.1-01 DOC M.5
CTS 3.9.B.2
ITS 3.8.1 Required Action D.1 and D.2
Bases for Required Action D.2 for ITS 3.8.1, STS Bases markup page B 3.8-12 (insert page)

CTS allow operation for 7 days with 2 offsite circuits inoperable provided that all EDGs are OPERABLE and all core and containment cooling systems and shutdown cooling systems are OPERABLE. In the ITS, it is proposed to delete the requirement that cooling systems must be OPERABLE, and substitute (1) A requirement to declare required features inoperable when the redundant required features are inoperable, and (2) A requirement to reduce power to less than 45% of RTP. The 7 day completion time to restore both offsite circuits to OPERABLE status would remain unchanged.

Comment: The staff is of the opinion that this proposed change is beyond the scope of a conversion review **(BSCR)** since it does not totally represent what is in the CTS or in NUREG-1433. Therefore, it will have to be addressed outside of the conversion review

JAFNPP Response:

3.8.1-02 CTS 4.9.B.1
DOC L.3
ITS SR 3.8.1.3

The licensee has proposed to modify the loading requirements for the EDG subsystems to include a load range. The staff finds this acceptable. However, the licensee has also proposed to delete the CTS requirement to demonstrate the load sharing capability of the EDG subsystems. DOC L.3 does not explain why this is proposed or why it is acceptable.

Comment: The licensee should revise DOC L.3 to discuss why deletion of this CTS requirement is acceptable.

JAFNPP Response:

3.8.1-03 CTS 3.9.B.3, 3.9.B.4
ITS 3.8.1, Condition F

The CTS and the proposed ITS include conditions of one EDG inoperable, two EDGs in one subsystem inoperable, and two EDG subsystems inoperable. However, it is not clear in the CTS or proposed ITS what constitutes an inoperable EDG subsystem. Is a subsystem considered inoperable when one of the two EDGs is inoperable, or must both EDGs in the subsystem be inoperable before the subsystem is considered inoperable.

Comment: Consideration should be given to revising the language in proposed Condition F to make it clear when the Condition is entered. Language such as "Two EDG subsystems with one or more EDGs inoperable" is a possibility.

JAFNPP Response:
:

3.8.1-04 CTS 3.9.B.3, 3.9.B.5
ITS 3.8.1, Condition H
DOC A.6

Proposed Condition H addresses three or more AC sources inoperable. However, it is not clear what constitutes three inoperable AC sources. Proposed Condition E addresses one offsite inoperable coincident with one or both EDGs in a subsystem inoperable. This appears to be 3 inoperable sources, but LCO 3.0.3 is not involved.

Comment: Under what conditions, then, is LCO 3.0.3 invoked? Is LCO 3.0.3 invoked when two offsite circuits and any one of the 4 EDGs is inoperable? Is it invoked with one offsite circuit and one EDG in each EDG subsystem inoperable? It appears that Condition H requires some rewording consistent with the language used in other 3.8.1 Conditions that will make it clear when Condition H is entered.

JAFNPP Response::

3.8.1-05 CTS 4.9.C.2

:

DOC L.10

The proposal to change the frequency of monitoring automatic operation of the fuel oil transfer system from monthly to every 92 days is not acceptable. DOC L.10 states that the proposed change is consistent with NUREG-1433. This is not entirely correct.

Comment: The NUREG Bases state that the fuel oil system surveillance interval may be extended to as much as 92 days if the amount of fuel consumed during a monthly EDG load run is not enough to cause the transfer pump to automatically start. If, however, the amount of fuel consumed each month is enough to cause the transfer pump to start, then the surveillance interval is monthly.

JAFNPP Response:

3.8.1-06 Condition B
JFD DB7

The proposed Condition has the possibility of being confusing. The Condition addresses one EDG inoperable, but LCO 3.8.1.b addresses two EDG subsystems. It is possible that Condition B could be interpreted to mean one EDG subsystem inoperable rather than 1 of 4 EDGs inoperable.

Comment: The LCO and/or the Condition should be modified such that they use the same language. For example, the LCO could be stated as requiring four EDGs in two EDG subsystems.

JAFNPP Response:

3.8.1-07 Required Action B.2
JFD DB3

The Conditions associated with these Required Actions both address inoperable EDGs. The staff does not understand why there should be a difference between Required Actions B.2 and C.1, and JFD DB3 does not provide a great deal in way of an explanation.

Comment: The licensee is requested to provide an explanation for why Required Action B.2 differs significantly from Required Action C.1.

JAFNPP Response:

3.8.1-08 Required Action B.3.1, B.3.2, B.4

The language of these Required Actions is possibly confusing.

:

Comment: Consideration should be given to modifying the language to address only EDGs as opposed to EDG and EDG subsystem. See comment 3.8.1-06.

JAFNPP Response:

3.8.1-09 Condition E and Required Action E.2

The Condition E is stated in terms of EDGs (in a subsystem) while the Required Action E.2 is stated in terms of restoring a EDG subsystem to OPERABLE status. This is potentially confusing because the relationship of individual EDGs to a subsystem or to the OPERABILITY of a subsystem has not been established.

Comment: Consideration should be given to modifying the language of this Condition to eliminate this potential confusion. See also comment 3.8.1-06.

JAFNPP Response:

3.8.1-10 Condition F, Required Action F.1

Condition B, C, and E are stated in terms of inoperable EDGs. Condition F, however, is stated in terms of EDG subsystems. This is potentially confusing because the relationship between individual EDGs and the OPERABILITY of the EDG subsystems has not been established.
Comment: Consideration should be given to revising the language of this Condition to eliminate this potential confusion. The Condition could be worded as follows: One or two EDGs or both EDG subsystems inoperable. The Required Action could be worded as follows: Restore two EDGs in one EDG subsystem to OPERABLE status.

JAFNPP Response:

3.8.1-11 Condition H

The wording of this Condition needs some revision. As stated, the plant status in Condition E (with two EDGs in a subsystem inoperable) would invoke this Condition.

Comment: Something is necessary to make it clear that the Condition applies to multiple inoperabilities other than those covered by Condition E.

JAFNPP Response:

3.8.1-12 SR 3.8.1.2

:

JFD DB6

Note 2 to this SR in NUREG-1433 is a permissive, not a requirement. Without this Note, the SR can be interpreted as not allowing prelube, and as requiring immediate EDG loading following a start.

Comment: The licensee might want to reconsider including at least part of this Note in the ITS.

JAFNPP Response

3.8.1-13 SR 3.8.1.3

This proposed SR does not accurately reflect CTS requirements in that the requirement to demonstrate load sharing is not included.

Comment: The staff is of the opinion that this proposed change is beyond the scope of a conversion review **(BSCR)** since it does not totally represent what is in the CTS or in NUREG-1433. Therefore, it will have to be addressed outside of the conversion review . See comment 3.8.1-02

JAFNPP Response:

3.8.1-14 SR 3.8.1.6
JFD X12

The 92 day frequency for verifying fuel oil transfer system OPERABILITY is not acceptable.
Comment: See comment 3.8.1-05.

JAFNPP Response:

3.8.1-15 JFD CLB.9
ITS SRs 3.8.1.7, 3.8.1.8, and 3.8.1.11
STS SR 3.8.1.8 Note
STS SR 3.8.1.9 Note 1
STS SR 3.8.1.14 Note 2
Bases for ITS SR 3.8.1.7, STS Bases markup page B 3.8-20
Bases for ITS SR 3.8.1.8, STS Bases markup page B 3.8-21
Bases for ITS SR 3.8.1.11, STS Bases markup page B 3.8-28

JFD CLB.9 references GL 91-04 which in turn, addresses giving proper regard for the effect of performing surveillance at power on safe operational of the plant.

Comment: JFD CLB.9 states, "This change is consistent with the current JAFNPP licensing basis which does not restrict the Mode in which these Surveillances may be performed."
The licensee should provide the results of an analysis that demonstrates that these SRs can be performed at power without adversely affecting safety. Special attention should be focused on voltage perturbations during performance of these SRs.

JAFNPP Response:

3.8.1-16 ITS SR 3.8.1.10

Part of the acceptance criteria for this SR is to demonstrate that permanently connected loads remain energized from offsite power and that emergency loads are energized from offsite power.

Comment: The licensee has changed "offsite" to "reserve" which is consistent with plant terminology. However, it is the staff's understanding that power to the emergency busses during power operation comes from the main generator and not from the reserve transformers. In the event of an accident (ECCS initiation) there would be a reactor trip and a generator trip followed by a transfer of power to the reserve transformers. Since this is the scenario that would occur in the event of an actual design basis accident, should it not be a part of the acceptance criteria for this SR?

JAFNPP Response:

3.8.1-17 JFD X.8
DOC M.11
CTS 4.9.B
ITS SRs 3.8.1.9 and 3.8.1.12

ITS SRs 3.8.1.9 and 3.8.1.12 require achieving steady state voltage $\geq$ 3830 volts and $\leq$ 4400 volts. This is a proposed change relative to corresponding CTS 4.9.B, which does not specify these values.

Comment: JFD X.8 and DOC M.11 do not explain why proposed the lower limit (3830 volts) for ITS SRs 3.8.1.9 and 3.8.1.12 which differs from the lower limit (3744 volts) for ITS SRs 3.8.1.2 and 3.8.1.10 values are acceptable. Revise the submittal to explain why these proposed values are acceptable.

JAFNPP Response:

3.8.1-18 ITS SR 3.8.1.11

JFD CLB 3

The licensee has deleted the value for power factor ($\leq$ 0.9) from this SR and substituted the phrase "within the power factor limit." It is assumed that the "limit" is stated in the Bases. This is not acceptable because the valve in the Bases becomes a part of the TS.

Comment: The Bases are intended to explain the TS, but should not include requirements such as has been done in this case. This SR needs to be revised to eliminate this problem.

JAFNPP Response:

3.8.1-19 NUREG SR 3.8.1.18
JFD DB2

The licensee has proposed to delete this SR. The justification is that JAFNPP does not have sequencers, and the SR is, therefore, not applicable. JAFNPP may not have sequencers, but it does have individual load timers.

Comment: The purpose of this NUREG surveillance is to verify that the interval between load applications to the EDGs (and offsite circuit in some cases) is adequate to ensure the EDG has recovered from one load application before another load is applied. This SR is applicable to individual load timers as well as to sequencers. It should be included in the TS.

JAFNPP Response:

3.8.1-20 SR 3.8.1.12
Note 1 JFD DB1

Proposed Note 1 indicates that force paralleling is only applicable to an EDG subsystem with two OPERABLE EDGs. This Note may be acceptable in some cases, but does not appear to be acceptable here.

Comment: This SR is a test of the response of the onsite power sources to a LOOP/LOCA, and the onsite power sources, by design, include two EDGs in each of 2 subsystems. The force paralleling of the EDGs in a subsystem is also a design feature that must be tested as part of this SR. If one or more of the EDGs is inoperable, this SR cannot be adequately performed. Consequently, Note 1 is not acceptable. This staff comment may apply to other SRs with the same Note.

JAFNPP Response:

:

3.8.1-21 Bases for ITS LCO 3.8.1, STS Bases markup page B 3.8-4 (insert page)
Bases for STS LCO 3.8.1

:

The Bases for ITS LCO 3.8.1 states, "The Limiting Condition for Operation may be met with the 115 kV North and South bus disconnect (10017) open or closed. With the disconnect closed, the automatic opening feature must be Operable."

Comment: Identify the proposed Surveillance Requirement that verifies the Operability of the automatic opening feature, and explain how the verification is accomplished. Also provide a discussion regarding the purpose of the disconnects and under what conditions they are supposed to function.

JAFNPP Response:

:

3.8.1-22 Bases PG. B3.8-8
Action B.2 JFD DB2

The licensee is requested to provide a more detailed discussion regarding Action B.2. The discussion should address how the RHR pumps function when both EDGs in a subsystem are OPERABLE, and how they function when one EDG in a subsystem is inoperable.

Comment: The response should also discuss which RHR pump is declared inoperable under what circumstances per Action B.2, and why it is tied to inoperable core or containment cooling features. It should also be noted that the proposed Bases discussion for Action B.2 does not appear to adequately describe the Action or its intended effect. A Bases revision may be required.

JAFNPP Response:

:

3.8.1-23 Bases Pg. B3.8-12
Insert Condition D

In the last part of the second paragraph of the insert there is a discussion of a scenario wherein both reserve circuits become inoperable at different times. For this scenario, it is stated that Action A.3 must be met for the first inoperable reserve circuit.

Comment: The staff understanding of this is that if Action A.3 is not satisfied, Condition G must be entered. Is this correct? The staff further understands that if Condition D is entered, it continues to apply until both reserve circuits are restored to OPERABLE, or until Condition G is entered 7 days following the inoperability of the second reserve circuit. Is this also correct?

JAFNPP Response:

3.8.1-24 Bases PG. B3.8-13
Condition F

:

The Bases discussion does not clearly state what constitutes an inoperable EDG subsystem.

Comment: The staff believes that one or both EDGs in a subsystem constitutes subsystem inoperability. The licensee should revise this Bases discussion to clearly state under what conditions the subsystem is inoperable. See also 3.8.1-10.

JAFNPP Response:

3.8.1-25 Bases Pg. B3.8-15
Condition H

This Bases discussion needs to be revised to clearly state under what circumstance the Condition is entered. For example, Condition E includes a plant status in which one reserve circuit and two EDGs in one subsystem could be inoperable, but Condition H is not invoked.

Comment: The above inconsistency needs to be addressed.

JAFNPP Response:

3.8.1-26 Bases Pg. B3.8-19
SR 3.8.1.6

The staff does not agree with the 92 day frequency for this SR.

Comment: See 3.8.1-05.

JAFNPP Response:

3.8.1-27 Bases Pg. B3.8-20
SR 3.8.1.7 JFD PA1

JFD PA1 does not provide an adequate justification for inclusion of Insert BSR 3.8.1.7-A.

Comment: The licensee is requested to provide a detailed justification of the acceptability of this proposed change. Also, in order for the staff to understand this proposed change, the licensee is requested to provide a discussion of how this SR can be successfully demonstrated is a "series of sequential, overlapping, or total steps."

JAFNPP Response:

3.8.1-28 Bases Pg. B3.8-25

SR 3.8.1.10

Comment: See 3.8.1-16

JAFNPP Response:

3.8.1-29 Bases Pg. B3.8-30
NUREG SR 3.8.1.18

Comment: See 3.8.1-19

JAFNPP Response:

3.8.1-30 Bases Pg. B3.8-31
Insert BSR 3.8.1.12NT

Comment: See 3.8.1-20

JAFNPP Response:

3.8.2, AC Sources - Shutdown

3.8.2-01 LCO 3.8.1

Part a. of LCO 3.8.2 requires one reserve circuit between the 115KV transmission network and the plant class IE electrical power distribution subsystem (s) required by LCO 3.8.8.

Comment: Given the Fitzpatrick design (each reserve transformer can power only one division), how can one reserve circuit provide power to required loads per LCO 3.8.8 if those loads are associated with the division not connected to the one reserve circuit? Does this LCO need to be revised?

JAFNPP Response:

3.8.2-02 DOC M.4
JFD TP.1
ITS 3.8.2 Actions Note
STS 3.8.2
Bases for ITS 3.8.2 Actions Note, STS Bases markup
page 3.8-38 (insert page)

A NOTE is proposed to be added to the Actions of this LCO for ITS 3.8.2 states. The NOTE states that "LCO 3.0.3 is not applicable," and the justification provided is that inclusion of this NOTE is consistent with TSTF-36. TSTF-36 has not been accepted by the staff.

Comment: Any proposed changes that use an unapproved TSTF as a justification are likely not acceptable. The prosed NOTE should be deleted.

JAFNPP Response:

3.8.2-03 ITS LCO 3.8.2
STS LCO 3.8.2

ITS LCO 3.8.2 requires, "One emergency diesel generator capable of supplying one division of the plant Class 1E AC electrical power distribution subsystem(s) required by LCO 3.8.8," in conformance with the STS.

Comment: Confirm that each emergency diesel generator can provide the power required in Modes 4 and 5.

JAFNPP Response:

3.8.2-04 Bases Pg. B3.8-37
LCO discussion

In the second paragraph of the LCO discussion it is stated that the reserve circuits (plural) must be capable of maintaining rated frequency and voltage while connected to their respective 4.16KV emergency bus (singular).

Comment: This seems to support the question raised in 3.8.2-01 regarding how one reserve circuit can supply loads associated with 2 divisions. Is this Bases discussion correct? Is some revision required here as well as in the LCO?

JAFNPP Response:

3.8.2-05 Bases Pg. B3.8-37
LCO discussion

The next to last paragraph includes a statement to the effect that "proper sequence operation is an integral part of reserve circuit OPERABILITY–." Is this correct?

Comment: If the statement is correct, what function do the sequences or load times play, and why is this not reflected in LCO 3.8.1?

:

JAFNPP Response:

3.8.2-06 Bases Pg. B3.8-38
Action A.1, Insert Action A.1

This Bases discussion is based on a plant design which allows one offsite circuit to power more than one 4.16KV emergency bus. This is not the Fitzpatrick design.

Comment: (1) The Bases should be revised to make it clear that a reserve circuit is inoperable if it is not available to its associated bus (no one required bus), and that if 2 divisions are required, then both reserve circuits must be OPERABLE.

(2) The staff does not understand the purpose of proposed Insert Action A.1. How can a reserve circuit be considered inoperable because it is not powering other required features? The licensee is requested to provide a detailed explanation of what the proposed insert means.

JAFNPP Response:

3.8.2-07 Bases Pg. B3.8-38 and B3.8-39
Action A.2.1, A.2.2, etc.

On Pg. B3.8-37, there is another reference to a single reserve circuit not being available to multiple 4.16KV emergency busses. As discussed previously, this is not the Fitzpatrick design. The Bases should be revised accordingly. On Pg. B3.8-38 (first paragraph) the licensee has proposed to add "or the required reserve circuit inoperable and Required Action A.1 not taken" in the discussion of EDG inoperability.

Comment: The staff does not understand what the intent of this proposed addition is. The licensee is requested to provide a discussion of what the purpose of this addition is.

JAFNPP Response:

3.8.3, Diesel Fuel Oil, Lube Oil, and Starting Air

3.8.3-01 NUREG SR 3.8.3.6
JFD TA.1

The licensee has proposed to relocate this SR to licensee control in accordance with TSTF-2.

Comment: This is acceptable in concept. However, the licensee should provide information regarding where the SR will be relocated to, and the controls associated with the relocation.

JAFNPP Response:

3.8.3-02 Bases for ITS SR 3.8.3.3, STS Bases markup page B 3.8-46
Bases for STS SR 3.8.3.3

The Bases for STS SR 3.8.3.3 states, "These tests are to be conducted prior to adding the new fuel to the storage tank(s), but in no case is the time between receipt of the new fuel and conducting the tests to exceed 31 days." The Bases for corresponding ITS SR 3.8.3.3 states, "These tests are to be conducted prior to adding the new fuel to the storage tank(s), but in no case is the time between ~~receipt~~ the sample (and corresponding test results) of the new fuel and ~~conducting the tests~~ addition of new fuel oil to the storage tanks to exceed 31 days." PA.2 states, "Editorial changes have been made for enhanced clarity ..."

Comment: The proposed difference is not editorial. Revise the submittal to provide the appropriate justification for the proposed difference, or conform to the STS.

JAFNPP Response:

3.8.3-03 Bases Pg. B3.8-47
JFD DB3

The NUREG Bases reference to ASTM D2276 is deleted and a reference to ASTM D5452 is substituted. However, JFD DB3 does not explain why this change should be considered acceptable.

Comment: The licensee is requested to provide a discussion of why the change should be acceptable; i.e., D5452 replaces D2276 and provides the same information, or other justification.

JAFNPP Response:

3.8.3-04 Bases JFD PA.1
Bases for ITS SR 3.8.3.3, STS Bases markup insert page B 3.8-47
Bases for STS SR 3.8.3.3

The Bases for STS SR 3.8.3.3 states, "Within 31 days following the initial new fuel oil sample, the fuel oil is analyzed to establish that the other properties ... ." The Bases for corresponding ITS SR 3.8.3.3 states, "These additional analyses are required by Specification 5.5.10, Diesel Fuel Oil Testing Program, to be performed within 31 days following sampling and addition."

Comment: The proposed difference does not provide a clear reference point for the additional analyses because sampling and addition are not concurrent events. Bases JFD PA.1 does not explain why the proposed difference is acceptable. Revise the Bases to clarify the intent and provide the appropriate justification for the proposed difference, or conform to the STS.

JAFNPP Response:

3.8.4, DC Sources - Operating

3.8.4-01 DOC A.4
ITS 3.8.4
STS 3.8.4
CTSs 3.9.E.3 and 3.9.F.3

CTSs 3.9.E.3 and 3.9.F.3 state, "From and after the time that both batteries/power supplies are made or found to be inoperable for any reason, the reactor shall be in a cold condition within 24 hours." This requirement has not been retained in the Actions for corresponding ITS 3.8.4, in conformance with the STS.

Comment: DOC A.4 states that in the event that this Condition occurs, the plant would be shutdown in accordance with ITS LCO 3.0.3, which requires achieving Mode 4 in 37 hours. This proposed change appears to be less restrictive. Revise the submittal to provide the appropriate justification for the proposed change.

JAFNPP Response:

3.8.4-02 CTS 4.9.E.1
DOC L2

The proposed change to decrease the frequency for overall battery voltage measurement from every 7 days to every 31 days is not acceptable.

Comment: The submittal should be revised to retain the current 7 day frequency.

JAFNPP Response:

3.8.4-03 CTS 3.9.F.1

The CTS include a requirement that MCC-155 and MCC-165 be OPERABLE. The CTS markup indicates that this requirement is moved to ITS 3.5.1. However, the staff is unable to locate any requirement for MCC OPERABILITY in LCO 3.5.1.

Comment: The licensee is requested to provide additional discussion on why they consider this CTS requirement to be included in LCO 3.5.1, or revise the ITS to include a specific requirement.

JAFNPP Response:

:

3.8.4-04 CTS 3.9.F.2.a
DOC A.2, L3

The proposed change deletes the requirement that the other LPCI MOV independent power supply be OPERABLE. The justification is that the ITS does not have a Condition for two inoperable independent power supplies, and that such a plant status would invoke LCO 3.0.3. However, the Required Action with one power supply inoperable is to declare the associated LPCI subsystem inoperable. With this arrangement, ITS Section 3.5 will control in one case, while ITS Section 3.8 will control in another case. Is this not a possible cause for confusion? Would it not be better to have only one section of the ITS control the actions for single or multiple independent power supply inoperabilities?

Comment: The licensee is requested to reconsider the proposed organization of ITS 3.5 and ITS 3.8.

JAFNPP Response:

:

3.8.4-05 CTS 3.9.F.2.C
DOC L6

The licensee has proposed to delete this CTS requirement because failure to meet the requirement is cause for an immediate plant shutdown.

Comment: Such action is overly restrictive when viewed in light of the 7 day AOT allowed for a LPCI subsystem inoperability for other reasons. The staff understands and accepts this proposed change. However, staff acceptance notwithstanding, is it not desirable to repower the MOV bus from an alternate source if it can be done? Should this requirement be considered for relocation to something like the TRM instead of being completely deleted?

JAFNPP Response:

:

3.8.4-06 SR 3.8.4.1
Bases Pg. B3.8-54 SR 3.8.4.1
JFD TP1

TSTF-202 has not been accepted by the staff.

:

Comment: Therefore, the change in frequency for this SR from 7 days to 31 days is not acceptable.

JAFNPP Response::

3.8.4-07 Bases Pg. B3.8-54
Action C.1

The Bases discussion needs to be expanded to include a discussion of what constitutes an inoperable LPCI MOV power supply subsystem similar to what is included in the Action A.1 Bases.

Comment: Licensee to address the above staff concern.

JAFNPP Response:

:

3.8.4-08 CTS 3.9.F.1

The CTS includes a reference to inverter busses MCC-155 and MCC-165. The CTS markup shows these busses being moved to LCO 3.5.1. However, LCO 3.5.1 does not appear to include any reference to these MCCs.

Comment: The licensee should revise the submittal to show these MCCs appropriately in LCO 3.5.1 or retain them in the appropriate 3.8 LCO.

JAFNPP Response:

:

3.8.4-09 DOC M.3
ITS SR 3.8.4.1
STS SR 3.8.4.1
CTSs 4.9.E.1 and 4.9.F.1

ITS SR 3.8.4.1 requires to "Verify battery terminal voltage is

a. ≥ 127.8 VDC for 125 VDC batteries, and
b. ≥ 396.2 VDC for 419 VDC LPCI MOV independant power supply batteries,"

Comment: Why is the voltage for the 419 VDC LPCI MOV independent power supply batteries specified as 396.2 VDC as opposed to 419 VDC? How many cells are in these batteries, and what individual cell voltage is maintained in each?

JAFNPP Response:

:

3.8.5, DC Sources - Shutdown

3.8.5-01 ITS LCO 3.8.5, Bases Pg. B3.8.61
Proposed Actions Note
JFD TP.1

TSTF-36 has not been accepted by the staff. Therefore, inclusion of the proposed Actions Note regarding LCO 3.03 is not acceptable.

Comment: Licensee to revise submittal to retain current requirement or provide justification.

JAFNPP Response:
:

3.8.6, Battery Cell Parameters

3.8.6-01 CTS 4.9.E.1, 4.9.F.1, SR 3.8.6.1
DOC L1, JFD TP1

TSTF-202 has been accepted by the staff. The proposed change in frequency for this surveillance from 7 days to 31 days is not acceptable.

Comment: Licensee to retain current requirement or provide justification.

JAFNPP Response:
:

3.8.6-02 Base Pg. B3.8-67, Table 3.8.6-1
JFD X3

The Bases discussion should be revised to more clearly state the purpose and limitation of the term "and following" which is added to footnote (a).

Comment: The staff suggests that the Bases discussion be in two parts, one covering during the equalizing charge, and a second part covering "and following" the equalizing charge. In addition, the second part should include some of the material in JFD X3 such as "72 hours", and "allows time for the electrolyte temperature to stabilize---". The proposed Bases language of "several days following—" is not specific enough and should be replaced with a definite time; i.e., 72 hours.
Licensee Response:

3.8.7, Distribution Systems - Operating

3.8.7-01 CTS 4.9
DOC L1

:

CTS require a plant shutdown if a 125VDC distribution bus is inoperable. The licensee has proposed to change the CTS requirement to allow an 8 hour AOT for an inoperable dc distribution system in the ITS. The justification provided in support of this change (DOC L1) does not provide adequate information on why this change is acceptable.

Comment: The licensee should revise this justification to specifically address the impact of an inoperable distribution system and, based on this, justify the proposed 8 hours. Otherwise, adopt the NUREG limit of 2 hours.

JAFNPP Response:

:

3.8.7-02 CTS 4.9
DOC A3

The proposed addition of Action D is designated as an Administrative change. The staff does not agree with this classification. CTS requires a plant shutdown if any distribution system is inoperable. Changing the CTS to require a plant shutdown when two (or more) distribution systems are inoperable, and only then if a loss of function is involved, is a decidedly less restrictive change.

Comment: The classification of the DOC covering the addition of Condition D should be changed to less restrictive and an adequate justification for the change provided. The discussion should also address why the allowance of "two or more" AC distribution subsystems inoperable is acceptable.

JAFNPP Response:

:

3.8.7-03 LCO 3.8.7 Condition B
Required Action B.1 Completion Time
JFD XI

Condition B addresses "one or more" DC electrical power distribution subsystems inoperable. At this plant, there are only two DC distribution subsystems, and more than one inoperable means that at least two (or both) subsystems are inoperable. Since the DC subsystems provide control power to both divisions of engineered safeguards systems, the loss of 2 subsystems means a complete loss of safeguards systems and is a condition for 3.0.3 entry.

Comment: In light of the above, it seems to be inappropriate for the Condition to address "one or more". The Condition should address only "one" DC subsystem inoperable.
With regard to Required Action B.1 Completion Time,The licensee should revise this justification to specifically address the impact of an inoperable distribution system and, based on this, justify the proposed 8 hours. Otherwise, adopt the NUREG limit of 2 hours. (see 3.8.7-01 above.)

JAFNPP Response:

:

:

3.8.7-04 Bases Pg. B3.8-82
Action A.1 JFD PA5

In the first paragraph of the Action A.1 discussion on this page, the term "active component" is inserted between single and failure. What is the purpose of this addition? How does the licensee identify what constitutes active components in the distribution subsystems? JFD PA5 does not provide any clarification for this proposed change.

Comment: The licensee is requested to provide a revised justification which discusses what the change is intended for and why it is acceptable.

JAFNPP Response::

3.8.7-05 Bases Pg. B3.8-82
JFD X3

The licensee has proposed to change the CTS requirement to allow an 8 hour AOT for an inoperable dc distribution system in the ITS. The justification provided in support of this change (JFD X3) does not provide adequate information on why this change is acceptable.

Comment: The licensee should revise this justification to specifically address the impact of an inoperable distribution system and, based on this, justify the proposed 8 hours. Otherwise, adopt the NUREG limit of 2 hours. See 3.8.7-01

JAFNPP Response:

:

3.8.7-06 Bases Pg. B3.8-85 Action B.1
JFD PA5, JFD X3

The Bases discussion for Action B.I is proposed to be changed by adding "or more" following "one" in the first sentence of the first paragraph. The discussion then goes on to state that the remaining DC distribution subsystem is adequate, etc. For this plant, there are only two DC distribution subsystems, and loss of more than one (i.e., two) means there is no DC distribution remaining.

Comment: The term "or more" should be deleted from the Bases. This Bases discussion is also modified by adding "active component" between "single" and "failure". See 3.8.7-04 for staff comments on this proposed change. See also 3.8.7-01 for staff comments regarding the 8 hour Completion Time. The above comments are also applicable to the second and third paragraphs on this page.

JAFNPP Response:

:

:

3.8.7-07 Bases Pg. B3.8-86 Action B.1
JFD X3

The staff concern regarding Completion Time addressed in 3.8.7-01 is also applicable to the second Completion Times discussed in the Bases on this page.

Comment: Licensee to address the above staff concern.

JAFNPP Response:

:

3.8.7-08 Bases Pg. B3.8-87
Condition D

This Bases discussion addresses more than one AC or DC electrical power distribution subsystem inoperable and the potential for loss of function.

Comment: See staff comments regarding loss of more than one DC distribution subsystem in 3.8.7-03 and 3.8.7-06. Some Bases revision may be required here.

JAFNPP Response:

:

3.8.7-09 Bases for Required Action A.1 for STS 3.8.9
Bases for Required Action A.1 for ITS 3.8.7, STS Bases markup page B 3.8-81, first paragraph
Bases Table B 3.8.7-1 Footnote *, STS Bases insert markup page B 3.8-88

The Bases for Required Action A.1 for STS 3.8.9 refers to "With one or more required AC buses, load centers, ... in one division." "In one division" has not been adopted in the Bases for Required Action A.1 for ITS 3.8.7.

Comment: No justification has been provided to support this proposed difference. Revise the submittal to provide the appropriate justification, or conform to the STS.

JAFNPP Response:

:

3.8.7-10 Bases for Required Action C.1 for STS 3.8.9
Bases for Required Action B.1 for ITS 3.8.7, STS Bases markup page B 3.8-85, second paragraph
Bases Table B 3.8.7-1 Footnote *, STS Bases insert markup page B 3.8-88

:

The Bases for Required Action C.1 for STS 3.8.9 refers to "... one division without adequate DC power, ..." The Bases for Required Action B.1 for corresponding ITS 3.8.7 refers to "... one or more DC buses without adequate DC power, ...".

Comment: No justification has been provided to support this proposed difference. Revise the submittal to provide the appropriate justification, or conform to the STS.

JAFNPP Response:

3.8.8, Distribution Systems - Shutdown

3.8.8-01 ITS LCO 3.8.8, Bases Pg. B3.8-91
Proposed Actions Note
JFD TP.1

TSTF-36 has not been accepted by the staff. Therefore, the proposed Actions Note which addresses LCO 3.0.3 is not acceptable.

Comment: Licensee to retain current requirement or provide justification for the proposed change.

JAFNPP Response:

:

NOTE TO LICENSEE:
3.8 There are two proposed changes (see items 3.8.1.01 and 3.8.1.13 above) that have been identified by the staff as Beyond Scope of Conversion Review (BSCR) items, these items will need to be addressed separately.

SECTION 3.9 REFUELING OPERATIONS

3.9.1 Refueling Equipment Interlocks

3.9.1-01 JFD TP1
DOC L2

This TSTF is pending and may not be completed in time for this conversion.

Comment: Licensee should provide detailed justification.

JAFNPP Response:

:

3.9.1-02 JFD DB1, 2

DB1 and DB2 have been interchanged in the JFDs and the ITS markup.

Comment: Change to agree with which ever is desired.

JAFNPP Response:

3.9.2 Refuel Position One-Rod-Out Interlock

Comment: No comments - No response is necessary.

3.9.3 Control Rod Position

Comment: No comments - No response is necessary

3.9.4 Control Rod Position Indication

Comment: No comments - No response is necessary

3.9.5 Control Rod OPERABILITY - Refueling

Comment: No comments - No response is necessary

3.9.6 [Reactor Pressure Vessel (RPV)] Water Level - [Irradiated Fuel]

3.9.6-01 JFD X1

This specification has been deleted from the ITS. It is the staff's opinion that this specification is important enough to be included. This specification is of such significance that the deletion should be reviewed by the tech staff.

Comment: Licensee should provide justification for this deletion as a Beyond Scope issue.

3.9.7 [Reactor Pressure Vessel RPV)] Water Level - New Fuel or Control Rods

Comment: No comments - No response is necessary

3.9.8 Residual Heat Removal (RHR) - High Water Level

3.9.8-01 JFD CLB 1

The Condition related to no RHR subsystem in operation has been deleted as well as the requirement to verify that the system is operating. The CTS markup shows this as a new specification, yet the ITS has deleted information based on current licensing basis. This

obviously is confusing. These deletions are of sufficient magnitude of such safety significance that they should be reviewed by tech staff.

Comment: The licensee should provide justification in more detail for the staff to review these changes as Beyond Scope issues.

JAFNPP Response:

3.9.9 Residual Heat Removal (RHR) - Low Water Level

3.9.9-01

The is same issue RAI 3.9.8-01 above.

Comment: Licensee should provide detailed information for the staff to evaluate as a Beyond Scope issue.

JAFNPP Response:

SECTION 5.0, ADMINISTRATIVE CONTROLS

5.2 Organization

5.2-01 CTS 6.2.2.6
DOC LA.2
STS 5.2.2.e
JFD TP1

STS Section 5.2.2.e and CTS Section 6.2.2.6 have been deleted and the ITS introduces a revised version of text. JFD TP1 and DOC LA.2 state that this change is based on TSTF-86. TSTF-86 has been withdrawn during the TSTF review process and has been superceded by TSTF-258 R.4. This TSTF (TSTF-258 R.4) has been approved by the NRC on June 1999.

Comment: Revise the submittal to either include CTS wording or re-evaluate and revise ITS as it pertains to TSTF-258 R.4.

JAFNNP Response:

5.5 Programs and Manuals

5.5-01 CTS 6.20.D
DOC A.5
ITS 5.5.6

JFD CLB1

CTS section 6.20.D markup has deleted the reference that states "The provisions of specification 4.0.B do not apply...." Changes to the STS with regards to SR 3.0.2 are covered in a letter from Mr. C. Grimes to Mr. David Modeen dated 11/2/95 and TSTF-52 as modified by staff comments on 10/96 qnd 12/98. See NRC RAI 3.6.1.1-4 for additional information.

Comment: Revise ITS 5.5.6 as needed to be consistent with Staff letter and TSTF-52 (as modified by staff comments).

JAFNNP Response:

5.5-02 CTS 4.7 & 4.11
DOC M.2
ITS/STS 5.5.8
JFD CLB3

In the STS markup section 5.5.8, the use of Regulatory Guide 1.52 and ASME N510-1989 has been replaced with insert 5.5.8-1 in which the basis for this deviation was provided as the Current Licensing Basis(CBL3). Part of this insert uses the term "significant" in reference to painting, fire, or chemical release in any ventilation zone communicating with the system. This term is not used in Regulatory Guide 1.52 or ASME N510-1989. It is understandable and reasonable in that this usage of the term "significant" is meant to define a threshold at which the test frequency should occur following painting, fire, or chemical releases. Conversely the term "significant" being used without specific definition does not really set any defined thresholds and it is left to individual for interpretation, be it the operator or the resident inspector. In addition, the use of this term is not in the (provided) current licensing basis and does not have an associated DOC. Recently this issue has been addressed in several correspondences between the NRC and the industry. In a letter from Mr. Jack N. Donahue of the NRC to Mr. Jerrrold G. Deweese of Entergy Operations, Inc. dated September 11, 1997 the NRC offered guidance relevant to this particular issue.

Comment: Review and revise insert 5.5.8-1 as necessary to encompass a reasonable understanding of when this test should be performed. This review and revision should take in to account the previously mentioned letter and Regulatory Guide 1.52, Revision 2 and in addition, there should also be a DOC/JFD to explain this change. Another option would be simply to adopt in total Regulatory Guide 1.52, Revision 2 and ASME N510-1989 as provided in first the bracketed item in STS 5.5.8.

JAFNNP Response:

5.5-03 CTS 4.7 & 4.11
DOC M.2
ITS/STS 5.5.8
JFD CLB3

In the STS markup section 5.5.8, the use of Regulatory Guide 1.52 and ASME N510-1989 has been replaced with insert 5.5.8-1 in which the basis for this deviation was provided as the Current Licensing Basis(CBL3). Assuming that insert 5.5.8-1 reflects the general intent of Regulatory Guide 1.52, Revision 2, several inconsistencies have been noted. In insert 5.5.8-1, the sentence that starts with "After each complete or partial...." should include the phrase "or removal of the charcoal absorber sample." at the end to make it consistent with Regulatory Guide 1.52. In addition, the sentence pertaining to 5.5.8.c that starts with "After any structural maintenance..." includes the term "HEPA filter" which is actually not necessary in this particular section.

Comment: Revise submittal to address issues as discussed above or provide discussion to justify why these changes are not necessary.

JAFNNP Response:

5.5-04

CTS 4.7 & 4.11
DOC VARIOUS
ITS/STS 5.5.8
JFD VARIOUS

In the STS markup section 5.5.8, references of the ASME N510-1989 standard have been deleted in several places and kept in section 5.5.8.e. It is unclear why the ASME N510-1989 standard is not used consistently throughout section 5.5.8.

Comment: Provide response for inconsistency in ASME N510-1989 standard usage as stated above.

JAFNNP Response:

5.5-05

CTS 4.7 & 4.11
DOC NA
ITS/STS insert 5.5.8-2(5.5.8.a), insert 5.5.8-3(5.5.8.b),
insert 5.5.8-5(5.5.8.b)
JFD PA9

In the STS markup section 5.5.8, insert 5.5.8-2, insert 5.5.8-3, and insert 5.5.8-5 have been provided for the bracketed items in 5.5.8.a, 5.5.8.b, and 5.5.8.e respectively. The numerical values in the column "Penetration" from insert 5..5.8-2, 5.5.8-3, and 5.5.8-5 do not appear to be consistent with Regulatory Guide 1.52 and it is not clear if these value are actually in the current licensing basis.

Comment: Provide response for inconsistency in Regulatory Guide 1.52 usage or provide supplemental current licensing basis information to support the numerical values as stated above.

JAFNPP Response:

5.5-06

CTS 4.7 & 4.11
DOC NA
ITS/STS 5.5.8.d
JFD X4

In the STS markup section 5.5.8.d the term "in accordance with [Regulatory Guide....." has been deleted. The JFD X4 appears to adequately justify the change but this test needs to been done in accordance with some procedure, guide, or standard.

Comment: Review and revise issue mentioned above such that this test will be administered in accordance with proper regulatory procedures. This situation would appear to be a "Generic Issue" that would warrant forwarding to the "Technical Specification Task Force" (TSTF) Owners Group(s) for consideration.

JAFNNP Response:

5.5-07

CTS RETS 2.5
STS 5.5.10
ITS 5.5.9
JFD None

CTS RETS 2.5 contains the statement "the amount that would result in concentrations less than...." There is indication in the CTS markup that this statement will be relocated or deleted. The STS 5.5.10 markup deletes this statement and replaces it with the statement ".. Or equal to 10 curies..." CLB5 states that this change reflects JAFNNP's current requirements. For this DOC to be true, both previously mentioned statements would have to be included in the ITS.

Comment: Revise the submittal to either include both previously mentioned wording in the ITS or provide less restrictive documentation to justify this change.

JAFNNP Response:

5.6 Reporting Requirements

5.6-01

CTS 6.9.A.4.d
STS/ITS 5.6.5.d

Last several words in paragraph CTS section 6.9.A.4.d have been deleted (omitted) with no discussion of change.

Comment: Noting that this change (deletion) is consistent with NUREG-1433, either provide DOC to justify change or retain original CTS wording.

JAFNNP Response:

5.7 High Radiation Area

5.7-01 CTS 6.11
STS 5.7
TSTF-258R.4 sections 5.7.1.4.i, 5.7.1.4.ii, 5.7.2.a, 5.7.2.e,5.7.2.f
ITS 5.7.1.d.4, 5.7.1.e, 5.7.2.a, 5.7.2.e, 5.7.2.f
JFD X1

In the proposed section 5.7 change, JFD X1 references a letter from the NRC to the Owners Groups dated 7/28/95. This letter eventually evolved into what is now the NRC approved TSTF-258, R.4. The latest revision (R.4) of this generic issue was approved by the NRC on 4/99 and the TSTF (Owners Groups) were notified of deposition (approved) via letter dated 6/29/99. In this proposed section 5.7 submittal, the sections as referenced above are not consistent with the NRC approved TSTF-258 R.4.

Comment: If adopting TSTF-258 R.4, revise sections (as mentioned above) for consistency or provide justification for changes. If not adopting TSTF-258 R.4, provide additional JFD(s) (explicit and technical) to explain the differences and in addition, to justify why you are not adopting the NUREG-1433 R.1 or the TSTF-258 R.4 (which in a few months will be in the standard NUREG-1433 R.2)

JAFNNP Response:
