



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20545-0001

FAX TRANSMITTAL

TO: TONY / STEVE
FROM: ANDREW KUGLER (301-415-2828)
DATE: 7/23
PAGES: (Excluding Cover) 1

MESSAGE:

EXCEPT FROM I.T.S.
SUBMITTAL, APPENDIX A,
DISCUSSION OF RELOCATION
OF CTS 3/4.8.4.5
SEE CRITERION 4 DISCUSSION

Location: One White Flint North
11555 Rockville Pike
Rockville, Maryland 20852-2738

clp

**DISCUSSION OF CHANGES
RELOCATED CTS INCLUDED IN APPENDIX A TO THE SPLIT REPORT**

- R.17 Circuit breakers and thermal overload devices actuated by fault currents are used as isolation devices to protect equipment associated with the Standby Liquid Control (SLC) System. Lack of continuity of any isolation device associated with either the incoming line or the pumps will disable only one train of the SLC System; the other train would still be available. Only one train is needed to be Operable for the SLC System to perform its intended function (i.e., meet 10 CFR 50.62 requirements). The SLC tank heaters are only required when mixing sodium pentaborate and/or water to establish the required solution operating parameters. Normal operation of the SLC System does not depend upon these heaters. Therefore, failure of the circuit breakers associated with the heaters and the heat tracing will not affect SLC System performance.

Comparison to Screening Criteria:

1. The SLC System associated isolation devices are not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary prior to a DBA.
2. The SLC System associated isolation devices do not monitor a process variable that is an initial condition of a DBA or transient analyses.
3. The SLC System associated isolation devices are not part of a primary success path in the mitigation of a DBA or transient.
4. The SLC System is judged by DECo to be risk significant. However, SLCS is retained as ITS 3.1.7 with pump surveillance requirements that adequately assure their operation without the need to separately test the continuity of the isolation devices. The isolation function itself is not judged to be risk significant nor are the function of the heaters as discussed above. Thus, this LCO provides no additional risk benefits.

Conclusion:

Since the screening criteria have not been satisfied, the SLC System Associated Isolation Devices LCO and Surveillances may be relocated to other plant controlled documents outside the Technical Specifications.