

January 8, 2002

Mr. Mano Nazar
Site Vice President
Prairie Island Nuclear Generating Plant
Nuclear Management Company, LLC
1717 Wakonade Drive East
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SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2 - REQUEST
FOR ADDITIONAL INFORMATION REGARDING THE APPLICATION FOR
CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS, SECTION 3.7
(TAC NOS. MB0695 AND MB0696)

Dear Mr. Nazar:

By application dated December 11, 2000, as supplemented March 6, June 5, July 3, August 13, November 12, and December 12, 2001, Nuclear Management Company, LLC, submitted a license amendment request to convert the current Technical Specifications (TSs) for the Prairie Island Nuclear Generating Plant, Units 1 and 2, to a set of improved TSs (ITS).

Enclosed is the Nuclear Regulatory Commission staff's request for additional information (RAI) on Section 3.7, "Plant Systems," of the subject ITS submittal. The contents of the enclosed RAI have been previously forwarded to Mr. Dale Vincent of your staff to facilitate any questions or clarifications on the RAI. Subsequent dialogues have clarified the staff's understanding on a number of items, and thus requires no further information as noted in the enclosure. For the rest of the items in the enclosure, please respond within 60 days from the date of this letter.

Please contact me on (301) 415-1392 if you have any questions regarding this RAI.

Sincerely,

/RA/

Tae Kim, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-282 and 50-306

Enclosure: Request for Additional Information

cc w/encl: See next page

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Prairie Island Nuclear Generating Plant,
Units 1 and 2

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PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2
REQUEST FOR ADDITIONAL INFORMATION
ITS SECTION 3.7, PLANT SYSTEMS

General Comments:

The following comments are general in that they may reflect issues affecting more than one, and perhaps all sections of the ITS submittal. Accordingly, responses should address the full scope of the resolution, not just the specific case noted in the comment. Some of these general comments may duplicate or overlap comments from reviewers for other ITS sections. In such cases, in the response, reference the previous comment(s).

- G3.7-1 Attachment 1 of ITS submittal cover letter dated 12/11/00, page 3, states that deleted specifications from CTS that duplicate regulatory requirements are categorized as R-type changes. Such deletions should be designated as L-type changes because they are “deleted”, not relocated to licensee controlled documents such as the TRM.
- G3.7-2 Why no A-type DOC submitted for SRs 3.7.7.2, 3.7.7.3, 3.7.8.5, and 3.7.8.6? See Supplemental submittal of Jul 3, '01, Table entitled “Review of ITS submittal 24 month SRs”, page 7.
- G3.7-3 DOCs LR3.7-045 and LR3.7-047 say the requirements of CTS 3.3.D.2.a(1) and (2) and CTS 3.3.D.2.b(1) and (2) are relocated to the SFDP. Each of these changes should either be an L-type DOC or an A-type DOC, depending upon whether or not ITS is more restrictive than CTS in the event (a) two CL safeguards pumps are inoperable, or (b) one CL header is inoperable with the horizontal CL pump operable. (See page 23 of Attachment 7 to the 12/11/00 submittal cover letter.)
- G3.7-4 The specification relocated as described by DOC R3.7-069 appears to be information related to spent fuel storage in ITS Section 4.0; why is it not addressed there? (See page 26 of Attachment 7 to the 12/11/00 submittal cover letter.)
- G3.7-5 DOC R3.7-079 says the ISI program contains testing requirements for snubbers; isn't the IST program the location of these test requirements that are duplicative of CTS 3.12, 4.13, and Table 4.13-1? (See page 26 of Attachment 7 to the 12/11/00 submittal cover letter.)
- G3.7-6 DOC LR3.7-100 indicates that changes to the ODCM are governed by 10 CFR 50.59. This is incorrect. Changes to the ODCM is governed by administrative control Specification 5.5.1. (See page 29 of Attachment 7 to the 12/11/00 submittal cover letter.)
- G3.7-7 DOC LR3.7-102 considers the movement of VFTP details from the LCO/SR sections to the Administrative Controls section of the TS as a “relocation”. This is incorrect. It is only an administrative change in presentation of CTS requirements, and should be designated as an A-type change. (See page 30 of Attachment 7 to the 12/11/00 submittal cover letter.)

ENCLOSURE

- G3.7-8 DOC R3.7-106 fails to state the purpose of the surveillance requirement for the auxiliary building crane lifting devices prior to handling heavy loads. Specifically, why it is not germane to the analyzed fuel handling accident? The DOC should also state that an operability requirement (i.e., LCO) for the AB crane is implied by virtue of the SR, thus making an R-type designation appropriate. Otherwise, an LR-type designation seems more appropriate. Please state what WCAP-11618 is, and how it supports relocating this SR. (See page 30 of Attachment 7 to the 12/11/00 submittal cover letter.)
- G3.7-9 Why is CTS 3/4.4.C corresponding to STS 3.7.18, not retained, but relocated?
- G3.7-10 In general, the submittal does not refer to CTS action requirements and ITS action requirements with terminology commonly used in converting to ITS from CTS, consistent with STS.
- G3.7-11 JFD CL3.7-125
ITS 3.7.4 Applicability and Required Action C.2
JFD CL3.7-129
JFD CL3.7-133
ITS 3.7.5 Applicability, Conditions B and D, and ACTION E
JFD CL3.7-143
ITS 3.7.6 Applicability and Required Action B.2
- ITS 3.4.6, RCS Loops - Mode 4, requires decay heat removal capability via the steam generators when RHR system is not in service. Therefore, the systems necessary for this to occur should be required operable in Mode 4 as long as the SG is relied upon for heat removal. Therefore, the ITS should adopt the STS Mode 4 Applicability of STS 3.7.4, 3.7.5, and 3.7.6, and associated action requirements, as noted above.
- G3.7-12 JFD TA3.7-150
STS 3.7.5 ACTIONS A and B, 10-day Completion Time
- Adopt the STS convention of a 10-day Completion Time to limit continuous operation within the Modes of Applicability to 10 days with the LCO not met. Note, the JFD cited appears to be an example of a general approach to not adopt such STS Completion Times; thus address this issue on a submittal-wide basis, including in ITS Section 1.3.
- G3.7-13 ITS 3.7.6 - proposed Actions Note
JFD CL3.7-141
- The proposed Actions Note is unnecessary. Remove it. This is a global comment for all such proposed notes for all shared systems at PI included in ITS.

G3.7-14 DOC M3.7-46, 49, 51, and 52

Adding a 4-hour allowance to establish a condition that permits continued plant operation for a specified time period, when no time was previously specified for establishing that condition, is less restrictive, not more restrictive. Revise the designation of the referenced DOCs accordingly.

G3.7-15 DOC LR3.7-81

The CTS Table 4.1-2A Equipment 11 functional test of the turbine stop, governor and intercept valves implies an operability requirement in CTS for these valves - thus, instead of an LR designation, the relocation of this specification could be treated as an R-type change.

G5.0-1 DOC LR5.0-02 considers the movement of the CTS IST requirements from the LCO/SR sections to the Administrative Controls section of the TS as a "relocation". This is incorrect. It is only an administrative change in presentation of CTS requirements, and should be designated as an A-type change. (See page 41 of Attachment 7 to the 12/11/00 submittal cover letter.) Similar mis-categorizations exist for DOCs LR5.0-03; 04; 05; and 22. All internal movement of CTS requirements within TS should be treated as A-type changes; check all such LR-type DOCs in the submittal. See similar comment G3.7-7 above.

G5.0-2 PI proposes not to include a secondary water chemistry program in ITS. This affects disposition of CTS Table 4.1-2B Item 16 and Note (6), which is proposed to be moved to the TRM per DOC LR3.7-112. This issue is for tracking purposes pending outcome of not adopting this program.

ITS 3.7.1, MSSVs

3.7.1-1 DOC L3.7-03
CTS 3.0.3
ITS 3.7.1 Action A

DOC L3.7-03 states the 4-hour Completion Time for restoring one inoperable MSSV to operability is based on "engineering judgement in accordance with WCAP 11618." After reviewing the development of this Completion Time from the previous Westinghouse Standard TS 3/4.7.1 ACTION a, as marked up in (draft Commanche Peak Unit 1 TS) WCAP 11618, it appears that a more explicit statement of the basis for the 4 hours is warranted. How does this time apply to a two-loop plant design?

Revise DOC L3.7-03 and the ITS Bases for Required Action A.1 with an explicit statement supporting its Completion Time. That the STS Bases does not contain such a statement is insufficient reason to omit it.

ITS 3.7.2, MSIVs

3.7.2-1 JFD CL3.7-115
ITS LCO 3.7.2 Applicability
STS LCO 3.7.2 Applicability
CTS 4.7
DOCs L3.7-33 and A3.7-34
CTS Table 3.5-2B Note c for Functional Unit 5.a and Table 4.1-1B Note 23 for Functional Unit 5.a, Manual Steam Line Isolation

- a. Does the referenced JFD mean that it is impossible to remotely open an MSIV unless it is first manually bypassed because (1) the operator on the MSIV has insufficient torque to overcome the differential pressure induced friction on the MSIV disk, (2) opening the MSIV, without first equalizing pressure by opening the bypass, could damage the valve and/or valve operator, or (3) the operating procedure requires opening the manual bypass before opening the MSIV?
- b. Suggest adopting the word “deactivated” in the Applicability, or explain why it is not appropriate in addition to saying it is not in CTS.

3.7.2-2 JFD CL3.7-114
ITS 3.7.2 Condition C
STS 3.7.2 Condition C Note
CTS 4.7

The STS note for STS 3.7.2 Condition C, allowing separate Condition entry for each MSIV, is appropriate for a two loop design and should be adopted. For example, assume the unit has operated in Mode 2 in Condition C with one inoperable and closed MSIV for more than 8 hours. In the event a second MSIV becomes inoperable, 8 hours would be allowed to accomplish Required Action C.1 only because of the extension permitted by ITS 1.3; however, LCO 3.0.3 would apply and govern placing the unit in Mode 4, despite the 8-hour extension, because there is not a stated Condition for two inoperable MSIVs. Were the note adopted, there would be no question about LCO 3.0.3 applying. In addition, Condition C should say “One or both MSIVs inoperable in Mode 2 or 3.”

3.7.2-3 ITS SR 3.7.2.2 Frequency
JFD X3.7-137
CTS 4.7

This is a placeholder for the beyond scope change to relax the CTS 4.7 MSIV automatic actuation surveillance requirement frequency from 18 months (“during Refueling”) to 24 months. No response required.

- 3.7.2-4 CTS Table 3.5-2B ACTION 27 for Functional Unit 5.a, Manual Steam Line Isolation
DOC M3.7-40
STS 3.3.2, Table 3.3.2-1, Function 4.a
CTS Table 4.1-1B Functional Unit 5.a, Functional Test
CTS 4.7
ITS SRs 3.7.2.1 and 3.7.2.2

In the event an MSIV manual steam line isolation (SLI) switch is inoperable (both channels), the STS would require entry into LCO 3.0.3, because STS 3.3.2 contains no ACTION for this condition. For the equivalent situation at PI (inability to manually close all MSIVs), CTS allow 48 hours to restore operability of the switch before taking action to shutdown the unit. ITS proposes to exclude the manual SLI function from ITS 3.3.2, and consider it an integral part of the operability of the associated MSIV itself - which appears consistent with the referenced CTS action statement. (However, the ITS 3.7.2 Bases do not explicitly say that the manual switch function must be operable for the MSIV to be considered operable; reliance on the definition of operability is insufficient in this case.) Including the manual instrumentation function in ITS 3.7.2 entails reducing the time allowed to restore the switch to the time proposed for restoring the associated MSIV, regardless of the reason the MSIV is inoperable. Thus the proposed action requirement is more restrictive than CTS (48 to 8 hours) but less restrictive than STS (1 hour of LCO 3.0.3 vs. 8 hours).

- a. Staff considers that the manual SLI function is part of the PI ESFAS instrumentation design. Therefore, staff prefer that PI include the manual SLI function in Table 3.3.2-1 and explicitly specify an 8-hour action statement along with the associated shutdown actions, in keeping with the NUREG-1431, Rev. 2, approach to instrumentation action requirements. Because of the nature of the PI manual SLI function design, staff agrees that 8-hours is an appropriate Completion Time.
- b. The CTS also specify a "Functional Test" each refueling for the manual SLI function; but it is unclear what CTS require this test include compared to what the ITS will require; specifically, which SR in ITS corresponds to this CTS test? Is it SR 3.7.2.1 or SR 3.7.2.2?

STS 3.7.3, MFIVs and MFRVs and Associated Bypass Valves

no comments

ITS 3.7.4, SG PORVs

- 3.7.4-1 DOC A3.7-01
JFD CL3.7-124
LCO 3.7.4 and 3.7.4 ACTIONS A and B

STS 3.7.4 requires the line (flowpath) associated with each SG PORV (ADV) to be operable; this includes block valve operability.

Comment: Adopt the STS presentation.

3.7.4-2 DOC L3.7-07
 CTS 3.4.A.2.a; 3.0.3
 ITS 3.7.4 Action B

The STS assumes a four-loop design; so the likelihood that all four PORV flowpaths are inoperable is remote. Thus it is unclear whether the loss of function condition on a two-loop design warrants a 24-hour Completion Time.

Comment: See resolution of this action requirement in ITS for Point Beach, which had similar CTS action requirements and has a similar SG ADV design. Staff will not accept a 24-hour Completion time for loss of both PORV flow paths. Propose a 1-hour Completion time.

3.7.4-3 JFD CL3.7-126
 STS SR 3.7.4.2
 JFD X3.7-130 & ITS SR 3.7.4.1 Frequency

As recommended in the STS, the SG PORV manual block valves should be cycled every 18 months to demonstrate they can be manually shut if a SG PORV is stuck open, to demonstrate operability of the associated line or flowpath.

Comment: Adopt STS SR 3.7.4.2, but insert the word “manual” before the word “cycle,” which is how Point Beach (also has manual block valves) ITS states this SR. Since block valve cycling is already done during the PORV quarterly SR (as stated in the JFD), this should not be an additional burden on plant operations.

3.7.4-4 DOC L3.7-95
 CTS 4.8.B
 ITS SR 3.7.4.1

The DOC first sentence incorrectly seems to say the entire SR is moved to the IST program; this is not the case. Only the Frequency. Actually, this change is only about relaxing the Frequency from monthly to quarterly, with the actual time stated in the IST program.

ITS 3.7.5, AFW

3.7.5-1 DOC L3.7-011
 CTS 3.4.B.1.c
 JFD CL3.7-128
 ITS LCO 3.7.5 Note

The ITS note includes the entire train and not just the motor driven valves and piping as the CTS provision does. The DOC fails to discuss in detail why this relaxation is acceptable, except to say it incorporates a condition in a TS interpretation letter from 1997 - implying the TS has not been updated in the interim. Comment: Provide explicit detailed justification for the relaxation.

3.7.5-2 See G3.7-12

3.7.5-3 DOC LR3.7-19
 CTS 3.4.B.2.a (markup page 3 of 50)
 3.7.5 Bases
 JFD PA3.7-255 & CL3.7-258
 SR 3.7.5.2 Bases

- a. Point out exactly where each of the indicated details appear in the Bases. Provide a specific reference for deferral of the IST-required quarterly flow test. In the STS markup, the phrase in parentheses "(only required at 3 month intervals)" is not adopted, apparently because of this deferral. Keep the phrase, but modify it to account for the deferral.
- b. The disposition of the phrase in CTS 3.4.B.2.a, first sentence of the second paragraph, "and/or associated system valves," is unclear. It is not included in ITS SR 3.7.5.2 or its Bases discussion - and thus does not appear to be covered by DOC A3.7-21. Explain the disposition of this phrase.

3.7.5-4 JFD CL3.7-246
 3.7.5 Bases background

Explain the normal lineup of the motor driven AFW pumps - and the capability to supply the opposite unit SGs. How does this capability relate to action requirement in CTS 3.4.B.2, the phrase in parenthesis?

3.7.5-5 ITS 3.7.5 Bases

Comments on Bases not associated with Specification comments:

SR 3.7.5.1 (from STS markup) Last two paragraphs in reverse order from STS; correct typo in last sentence of misplaced close-parenthesis.

3.7.5-6 CTS 3.4.B.2.e
DOC LR3.7-29

The 72-hour provisional action statement for inoperable [control room?] valve position monitor lights [for the AFW block and flow regulatory valves?] is considered by CTS to be necessary for AFW train operability - is this the case in ITS? The ITS Bases for 3.7.5 do not explicitly require control room indication and the STS definition of Operability also does not help, because it is unclear whether the STS considers such indication "necessary." Thus, the basis for simply relocating the action requirement to the TRM is not adequately explained.

3.7.5-7 DOC L3.7-91
ITS SR 3.7.5.3 and SR 3.7.5.4

- a. The change to a 24-month Frequency is beyond scope. This part of comment is for tracking purposes only. No response required to this part of the comment.
 - b. The last sentence about the 24-hour allowance before testing the turbine driven AFW pump should be addressed in its own A-type DOC. Also, the CTS markup (page 30 of 50) seems to indicate this note applies to SR 3.7.5.4 - but the NUREG markup shows this provision deleted. Resolve this discrepancy.
-

3.7.6, CSTs

3.7.6-1 ITS LCO 3.7.6 & Bases
DOC LR3.7-028
CTS 3.4.B.2.d
JFD CL3.7-141
ITS SR 3.7.6.1

(a) The LCO statement is ambiguous. With both units operating in Mode 1, 2, or 3, does it require two tanks or three tanks with 200,000 gallons available, or is either of these acceptable? And if only one unit is operating, is just one tank with 100,000 gallons available required to supply the operating unit, or could two or three tanks each have half or a third of this volume each? Further, assuming the event started with just 100,000 gallons divided between three tanks, with only a few thousand gallons remaining, would there still be adequate NPSH for the

AFW pumps, and adequate control room tank level indication - to permit switchover to the backup water source without having to stop the AFW pump(s)? Is 100,000 gallons per unit the correct volume considering level indication uncertainty and NPSH requirements?

(b) See G3.7-13

3.7.7, CC System

3.7.7-1 ITS SR 3.7.7.2 Frequency and SR 3.7.7.3 Frequency
JFD CL3.7-116
CTS 4.5.A.4.a

This change relaxes the CTS 4.5.A.4.a component cooling system automatic actuation surveillance requirement frequency from 18 months ("during each reactor refueling shutdown") to 24 months. It appears that CTS markup page numbered 37 of 50 fails to indicate a DOC for this relaxation. Provide a DOC and correct the markup. Otherwise, this comment is a placeholder for this beyond scope change. No response to the relaxation itself is required.

3.7.7-2 DOC A3.7-31
CTS 3.3.C.1.b
ITS 3.7.7 ACTION A

In CTS, either one CC pump or one CC heat exchanger may be inoperable for 72 hours; in ITS, both may be inoperable at the same time for 72 hours, provided they are in the same train. This is less restrictive. Thus the referenced DOC should have an L-designation.

3.7.7-3 JFD CL3.7-140
ITS SR 3.7.7.2 Note

The proposed note would appear to represent a generic difference from the NUREG. Give examples of non-safety related CC system automatic valves "in the flow path" that automatically actuate, and state the actuation signal. This would help support the need for the note on a plant specific basis, obviating the appropriateness of a TSTF. Also, the change may be beyond scope, depending upon the response.

3.7.7-4 JFD CL3.7-267
ITS LCO 3.3.7 Bases

- a. The Bases omit reference to the surge tank because the surge tank is not "associated" with a particular CC pump. The Bases should state the need of the surge tank for operability consistent with the PI design.
 - b. Explain why the phrase "not required for safety" is omitted.
-

3.7.8, Cooling Water System

3.7.8-1 ITS 3.7.8 Action D and SR 3.7.8.3

- a. The proposed action and surveillance requirements for the CL pumps 12 and 22 address only the available diesel fuel oil volume, not the fuel oil properties. Actions related to fuel oil properties not within limits are addressed in ITS 3.8.3; however ITS 3.8.3 does not require declaring the CL pumps 12 and 22 inoperable in the event the fuel oil properties are not restored to within limits in 7 days. Doing so is appropriate because the ITS 3.8.3 proposed Actions require declaring the emergency diesel generators inoperable and the fuel oil comes from the same tanks. Either add appropriate action requirements to ITS 3.8.3, or add corresponding action and surveillance requirements to ITS 3.7.8.
- b. See comment 3.8-01 regarding CTS 3.7.A.5(a) and DOC L3.8-12. The bases for ITS 3.8.3 should explicitly state that the specified fuel oil volume includes that for the diesel driven cooling water pumps 12 and 22. The Bases for ITS 3.7.8 should explicitly state that the fuel oil for CL pumps 12 and 22 comes from the same tanks as the fuel oil for the diesel generators, and is thus subject to the same testing and quality as required by the ITS administrative controls diesel fuel oil program.
- c. The diesel driven safeguards CL pumps are supported by starting air receivers. Establish within ITS 3.7.8 appropriate surveillance and action requirements, such as given in STS 3.8.3. Alternatively, establish a separate specification for the CL pump fuel oil and starting air.
- d. The increase in the required fuel oil volume to 19,500 gallons for the CL pumps should be described in its own M-type DOC; not buried in DOC L3.7-50 regarding the 48-hour completion time.

3.7.8-2 Which CL header supplies Unit 1 DG cooling, and at what points are the DG supply lines attached? Recommend the Bases explicitly describe this and any flexibility in lineup that the design and plant operating practice permit.

3.7.8-3 DOC LR3.7-47
 ITS 3.7.8 Actions A and B
 CTS 3.3.D.1.a
 CTS 3.3.D.2.a
 CTS 3.3.D.2.b
 DOC LR3.7-43

- a. CTS 3.3.D.2.b allows one CL header to be inoperable for 72 hours provided (1) the motor driven safeguards pump, (2) the opposite train/header diesel generator, (3) the opposite train diesel driven safeguards pump, and (4) the opposite train horizontal pump are all operable (i.e., the opposite train contains no inoperabilities). Corresponding ITS 3.7.8 Action B only requires verifying (1) the motor driven safeguards pump operable. This less restrictive change is not justified in the DOC LR3.7-47, which mistakenly relies on the SPDP. Either the opposite train diesel pump, the opposite train DG, and the opposite train horizontal pump are also required to justify the 72 hours or they are not. Explain why not, or revise the action requirements to retain the CTS requirements.
- b. (1) DOC LR3.7-43 states that the CTS requirements for the horizontal CL pumps are moved to the Bases. It does not appear this is the case; the horizontal CL pumps are only mentioned in the system description in the Bases background discussion, but are omitted from the components considered part of a CL system train. CTS 3.3.D.1.a require at least one of these to meet the LCO, and CTS 3.3.D.2.a specifies 7 days to restore an inoperable required horizontal CL pump to operable status; these requirements are not discussed in the Bases; even so, they should be retained in ITS 3.7.8.

(2) Also, the omission of the requirement for the traveling screens in CTS 3.3.D.1.c, although apparently addressed in ITS 3.7.9, is not justified by this DOC LR3.7-43, as indicated in the CTS markup.

3.7.8-4 ITS 3.7.8 Required Actions A.2 and B.2, and D.1

In accordance with STS convention, the Required Actions A.2 and B.2 should also specify a Completion Time of "10 days from discovery of failure to meet the LCO". Required Action D.1 should also specify a Completion Time of "9 days from discovery of failure to meet the LCO" (this action requirement could be in a separate specification - see comment 3.7.8-1.c).

3.7.8-5 ITS 3.7.8 Required Action C.1 Note
 JFD CL3.7-149

This note is unnecessary; so delete it. Also, attempting to shut down both units simultaneously may not be a good idea; the STS does not consider such a scenario. Other plants have specified a staggered or sequential shutdown in such cases - e.g., Point Beach. See G3.7-13.

3.7.9, Emergency CL Supply (STS 3.7.9, UHS)

3.7.9-1 ITS 3.7.9 Actions Note JFD CL3.7-155

The note is unnecessary, so delete it. With respect to Action D, see comments 3.7.8-5 and G3.7-13

3.7.9-2 ITS Required Action A.1 Note

The less than sign should be less than or equal than to match CTS 3.3.D.2.c. Also check that the format of Required Action A.1 is consistent with STS Rev. 2 convention.

3.7.9-3 ITS 3.7.9 Bases

- a. Explain why the Bases state that the traveling screens are not required for safeguards CL pump operability, but are required for the operability of equipment supplied by the CL system. (See LCO and Applicability discussions.)
 - b. The Bases for the Note to Required Action A.1 should explain why the CTS provision exempting compliance with the action to open a sluice gate for testing for periods of less than or equal to 24 hours is acceptable. Also, see comment 3.7.9-2, and revise Bases accordingly.
 - c. Please state the Bases the other water sources alluded to in the Bases for Required Actions C.1 and C.2.
 - d. Is quarterly the current plant practice regarding the frequency of doing the proposed SR 3.7.9.1 as indicated in JFD PA3.7-158?
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3.7.9-4 JFD CL3.7-161 STS SR 3.7.9.2

Explain why no temperature limit on CL water intake is necessary for inclusion in ITS, and thus why the referenced SR need not be adopted. The justification in the JFD is insufficient.

3.7.10, Control Room Special Ventilation System (CRSVS) (STS 3.7.10, CREFS)

3.7.10-1 ITS 3.7.10, LCO Note and Actions

- a. ITS 3.7.10 Actions Note is unnecessary, so delete it. See comment G3.7-13.
- b. DOC M3.7-55 says ITS LCO 3.0.3 does not allow an additional hour to initiate shutdown. Revise the DOC as this is not true.

- c. DOC M3.7-58 implies that Action A includes the option to place remaining CRSVS train in service with one train inoperable. But the LCO Bases (item d) says a CRSVS train is operable when it is aligned to perform its safety function *and is operating* (PA3.7-296), in spite of its radiation monitoring automatic actuation function being inoperable. Suggest specifying this option explicitly in ACTION A itself, consistent with the CTS 3.13.A.2, not by a description of this situation in the Bases. The description of the CTS to ITS transition in this case is confusing, and should be clarified.
- d. LCO 3.7.10 Note, added by TSTF-287, Rev 5, allowing intermittent opening of control room boundary under administrative control, along with the associated 24-hour action requirement and Bases changes, should be adopted. The Bases statement at the end of the LCO discussion is insufficient to adopt TSTF-287, R.5, even if it meets the "intent" as conjectured in JFD PA3.7-297.

3.7.10-2 DOC L3.7-103
 ITS SR 3.7.10.4

Extension of Frequency for CRSV fan testing to 24 months in addition to adopting the STAGGERED TEST BASIS provision of the STS, is a beyond scope change. This comment is for tracking purposes only. No response required.

3.7.11, Safeguards Chilled Water System [control room cooling included]

3.7.11-1 ITS 3.7.11 Bases - Background and Applicable Safety Analyses discussions

The description of the various safeguards room unit coolers serviced by the SCWS is misleading because of a missing comma; only one Unit 1 4160 switchgear room is supported by SCWS (which is it, bus 15 or 16?). All other rooms containing safeguards equipment, for both trains, are serviced by the associated SCWS loop/train. How are the other 4160 Vac switchgear rooms 25, 26, and 27 (and 15 or 16) cooled?

3.7.11-2 ITS 3.7.11 Actions Note
 JFD PA3.7-171

The note is unnecessary, so delete it. Also, the Bases for Required Actions B.1 and B.2 and C.2 use units in place of unit. Each unit's operations staff should read the TS from a single unit perspective, and take the specified action; however, it would seem prudent to specify in ACTION B a sequential shutdown in this case. See comments 3.7.8-5 and G3.7-13. ACTION E to enter LCO 3.0.3 immediately with both SCWS loops inoperable if in Modes 1, 2, 3, or 4, presents a difficult problem regarding specifying a sequential shutdown; therefore, it is suggested that the shutdown action be included explicitly in ITS 3.7.11 ACTION E, instead of relying on LCO 3.0.3.

3.7.11-3 DOC M3.7-59

The SCWS supports unit coolers for a number of safeguards equipment rooms, as well as supporting the control room special ventilation system (for which ITS 3.7.10 specifies a 7-day Completion Time for one train); currently, degradation in the SCWS system must be evaluated to determine the effect on supported equipment operability. If operability is found to not be supported, the appropriate action requirements would apply. Hence, while 3.7.11 is a new explicit support system specification, its addition to TS is not necessarily entirely more restrictive; rather, it may be much less restrictive given the allowed outage times currently specified for the several systems it supports. In this light, the proposed 30-day Completion Time for restoring one inoperable train requires additional justification. Just because STS 3.7.11 ACTION A specifies 30 days to restore one CREATCS train to operable status does not necessarily transfer to the SCWS, which supports more things than keeping control room temperature within limits.

3.7.11-4 ITS SR 3.7.11.1 Frequency
DOC M3.7-61
JFD X3.7-170

ITS proposes a frequency of 24 months for the SCWS loop automatic actuation surveillance requirement. What is the existing test interval by plant procedure? Explain why 24 months is acceptable given the current practice and past test results.

3.7.12, Auxiliary Building Special Ventilation System (ABSVS) [STS ECCS PREACS]

3.7.12-1 ITS 3.7.12 Bases

- a. On STS markup page B 3.7.12-4, at the top of the page, the phrase “coincident with loss of offsite power” is not adopted. Doesn’t PI assume during a LOCA that a single failure occurs with a coincident LOOP?
 - b. DOC PA3.7-323 says that ABSVS operability is not necessarily only tied to ECCS operability to justify omitting information contained in the STS 3.7.12 Bases discussions of Applicability and Required Action A.1. Recommend listing all the supported systems that determine when the ABSVS is needed to be operable. Also, if ABSVS is a direct support system for ECCS, then is a 7 day Completion Time appropriate?
 - c. It appears that the numbering of the Bases for SR 3.7.12.3 and SR 3.7.12.4 in the STS Bases markup are opposite to the numbering of these SRs in the STS markup. Also, DOC A3.7-105 does not explicitly retain CTS 4.4.E, though the Bases as proposed seem to include it - thus it may be that this is an LR-type change.
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3.7.12-2 ITS 3.7.12 Actions Note
JFD PA3.7-173

- a. The note is unnecessary, so delete it.

- b. The ACTIONS Bases discussion, first paragraph ends with the phrase, “thus ABSVS train inoperability can affect either or both units.” This is confusing, as it appears any inoperability of a train will affect both units, never just one.
- c. The Bases for Required Actions A.1, and C.1 and C.2 use units in place of unit. Each unit’s operations staff should read the TS from a single unit perspective, and take the specified action; however, it would seem prudent to specify in ACTION C a sequential shutdown in this case. See comments 3.7.8-5 and G3.7-13.
- d. The Bases discussion for Required Action A.1 states that both trains inoperable would require entering LCO 3.0.3 immediately. With both ABSVS trains inoperable, it is suggested that a sequential shutdown action be included explicitly in ITS 3.7.12, instead of relying on LCO 3.0.3.

3.7.12-3 ITS LCO 3.7.12 Bases
 JFD LR3.7-64
 CTS 3.6.F.1

The proposed Bases paragraph regarding the requirement to be able to de-energize the turbine building roof exhauster within 30 minutes following a LOCA does not exactly reflect the CTS requirement. This Bases paragraph should be put in the location of the deleted paragraph shown in the STS markup page B 3.7.12-4, which begins “ECCS PREACS is considered operable . . .”, and revised to clearly state that this capability is a condition of operability for the ABSVS.

3.7.12-4 ITS SR 3.7.12.4 Frequency
 DOC L3.7-101
 JFD X3.7-137
 CTS 4.15.B.3.c (?)

This is a placeholder for the beyond scope change to relax the CTS 4.15.B.3.c (?) ABSVS train automatic actuation surveillance requirement frequency from 18 months (“during Refueling”) to 24 months. No response required. See CTS markup, page 41 of 50.

3.7.13, Spent Fuel Pool Special Ventilation (SFPSVS) (STS 3.7.13, FBACS)

3.7.13-1 ITS 3.7.13 ACTION B
 DOC L3..7-72

The action requirements contained in ACTION B are not explicitly discussed in the referenced DOC.

3.7.13-2 ITS SR 3.7.13.3 and SR 3.7.13.4
DOC L3.7-103

Extension of Frequency for SFPSVS train actuation and fan flow testing to 24 months are beyond scope changes. This comment is for tracking purposes only. No response required.

3.7.14, Secondary Specific Activity (STS 3.7.18)

no comments

3.7.15, Spent Fuel Storage Pool Water Level

no comments

3.7.16, Spent Fuel Storage Pool Boron Concentration

no comments

3.7.17, Spent Fuel Pool Storage

no comments