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SUBJECT: Forwards suppl 7 re TS change request to convert to improved standard TS. Suppl provided to incorporate changes as result of NRC & CP&L reviews.

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**Carolina Power & Light Company**

Robinson Nuclear Plant
3581 West Entrance Road
Hartsville SC 29550

RNP File No: 13510HA

Serial: RNP-RA/97-0176

AUG 08 1997

United States Nuclear Regulatory Commission
Attn: Document Control Desk
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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
DOCKET NO. 50-261/LICENSE NO. DPR-23
TRANSMITTAL OF SUPPLEMENT 7 REGARDING THE
TECHNICAL SPECIFICATION CHANGE REQUEST TO CONVERT
TO THE IMPROVED STANDARD TECHNICAL SPECIFICATIONS

Gentlemen:

This letter provides Supplement 7 to the Carolina Power & Light (CP&L) Company's H. B. Robinson Steam Electric Plant (HBRSEP), Unit No. 2 Improved Technical Specifications (ITS) conversion submittal of August 27, 1996. This supplement is provided to the NRC to incorporate changes as a result of NRC and CP&L reviews.

By letter dated June 13, 1997, CP&L responded to NRC Question 3.1.6-2 that the proposed extension of the allowed outage time from one (1) hours to two (2) hours for the condition when control bank insertion is not within limits was not justified. The CP&L response committed to revising the submittal to restore the current licensing basis by July 31, 1997. During discussions with the NRC in a meeting conducted July 29-30, 1997, the NRC agreed to submittal of the change by August 8, 1997.

Attachment I provides an affidavit as required by 10 CFR 50.30(b).

Attachment II contains responses to previous NRC questions that have been revised as a result of NRC comments.

Attachment III contains a description of each change to the submittal contained in Supplement 7, organized in accordance with the ITS Sections.

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Attachment IV contains Supplement 7 to the ITS conversion submittal dated August 27, 1996, as modified by letters dated December 18, 1996, January 17, 1997, March 27, 1997, April 6, 1997, April 25, 1997, May 30, 1997, June 13, 1997, and June 18, 1997. Instructions for insertion of pages into the submittal are included.

If you have any questions concerning this matter, please contact me or Mr. H. K. Chernoff of my staff at (803) 857-1437.

Very truly yours,



T. M. Wilkerson
Manager - Regulatory Affairs

ALG/alg
Attachments

- I. Affidavit
- II. Revised Responses to NRC Questions.
- III. Detailed description of Supplement 7.
- IV. Technical Specifications Change Request To Convert To The Improved Standard Technical Specifications, Supplement 7

c: Mr. M. K. Batavia, Chief, Bureau of Radiological Health (SC)
Mr. L. A. Reyes, Regional Administrator, USNRC, Region II
Ms. B. L. Mozafari, USNRC Project Manager, HBRSEP (4 copies)
Mr. B. B. Desai, USNRC Resident Inspector, HBRSEP
Attorney General (SC) (w/out Enclosures)
Lockheed Idaho Technology, Inc.

Affidavit

State of South Carolina
County of Darlington

J. S. Keenan, having been first duly sworn, did depose and say that the information contained in letter RNP-RA/97-0176 is true and correct to the best of his information, knowledge and belief; and the sources of his information are officers, employees, contractors, and agents of Carolina Power & Light Company.

John S. Keenan

Sworn to and subscribed before me

this 8th day of August 19 97

(Seal) Albert J. Garrou
Notary Public for South Carolina

My commission expires: March 22nd 2005

50-261

CP&L

ROBINSON 2

SUPPLEMENT 7 REGARDING THE TECH SPEC
CHANGE REQUEST TO CONVERT TO THE
IMPROVED STANDARD TECHNICAL SPECS

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H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
TECHNICAL SPECIFICATIONS CHANGE REQUEST TO CONVERT TO THE
IMPROVED STANDARD TECHNICAL SPECIFICATIONS

REVISED RESPONSES TO NRC QUESTIONS

Revisions to responses to NRC questions are provided on the following pages identified by a side bar in the right hand margin. The enclosure reference in the upper left corner of the pages refer to the original Carolina Power & Light (CP&L) Company letter transmitting the original response.

ITS SECTION 1.0, "USE AND APPLICATION"
H.B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2

Revision No. 1
Supplement 7

	DOC or JFD	CTS/STS LCO	Description of Issue	COMMENTS	Resolution
1-1	A5	CTS 1.2.5	<p>CTS 1.2.5 defines Power Operating Condition as, "When the reactor is critical and the neutron instrumentation indicates greater than 2% rated power," while ITS Section 1.0 defines MODE 1 as, "... $K_{eff} \geq 0.99$ and % RATED THERMAL POWER > 5% (excluding decay heat)."</p> <p>This is a less restrictive change, rather than an administrative change, because the operator is allowed an additional 3% Rated Thermal Power before being required to meet all ITS requirements associated with MODE 1 operation. This ITS allowance also gives operators additional flexibility to scheduling and returning equipment to operable status prior to increasing thermal power to 5% that may not be permitted within the limits of current TS.</p>	Provide discussion and justification for the less restrictive change.	While the change in CTS definition to ITS definition for power operations would be a less restrictive change overall, the CTS applicability for each individual LCO is not consistently applied. As a result, this definition cannot be evaluated for its affect without considering how the definition is applied, both in CTS and ITS. Consequently, each application of the ITS requirement which results in a change to CTS Applicability requirements was evaluated in the appropriate ITS Section with its associated utilization of the new definition. Therefore the change in definition is considered an administrative change.

HBR ITS 3.1.4 ROD GROUP ALIGNMENT LIMITS

Revision No. 1
Supplement 7

ITEM #	DOC # or JFD#	CTS/ST S REF.	Description of Issue	COMMENTS	HBRSEP, Unit No. 2 Response
3.1.4-1	A6	CTS 3.10.6.1	CTS 3.10.6.1 requires declaring a control rod inoperable if the rod is misaligned by more than 15 inches from its bank. ITS 3.1.4 requires individual rod positions within 7.5 inches of the average of the individual rod positions in the bank when the bank demand position is < 200 steps. This is a more restrictive change for which there is no discussion or justification.	Provide discussion and justification for this more restrictive change.	CTS 3.10.6.1 requires a rod misaligned by more than 15 inches from its bank to be declared inoperable and CTS 3.10.6.2 allows one control rod to be inoperable during power operation. ITS 3.1.4 ACTION B allows only one rod to be misaligned. CTS 3.10.1.5 (ITS 3.1.4) requires for bank demand positions ≥ 200 steps that each rod shall be within 15 inches of its bank demand position and for bank demand positions < 200 steps that each rod shall be within 7.5 inches of the average of the individual rod positions in the bank. If either of these limits are not met, CTS 3.10.1.5 (ITS 3.1.4 ACTION B) requires action to be taken. Since the change reflects a presentation preference and is consistent with current plant interpretation, that a rod is misaligned when at positions < 200 steps and is > 7.5 inches out of alignment with the average of its bank position, the change is administrative. This is reflected in revised Discussion of Change A6 in Supplement 5.

ITEM #	DOC # or JFD#	CTS/STS REF.	Description of Issue	COMMENTS	HBRSEP, Unit No. 2 Responses
3.1.8	TSTF-14		CTS markup deletes MODE 2 from the Applicability.	TSTF-14 does not allow deletion of MODE 2. Rev. 2 proposed deletion, rejected. OG revised Rev 3 to restore. Restore MODE 2 reference in both LCO and Bases.	ITS 3.1.8 and the associated Bases are revised, in Supplement 5, to restore the MODE 2 reference to the Applicability.
3.1.8-1	JFD13	STS SR 3.1.10.1	STS SR 3.1.10.1 is deleted. The deletion is not justified on the basis of current licensing basis, system design, or operational constraints.	Provide justification for the STS deviation based on current licensing basis, system design, or operational constraints.	ISTS SR 3.1.10.1, modified to reflect current plant practice, is added to ITS 3.1.8 in Supplement 5. The CTS does not require performance of a CHANNEL FUNCTIONAL TEST (an ITS CHANNEL OPERATIONAL TEST) within a specified time frame prior to initiation of PHYSICS TESTS. Justification for deviation based on current plant practice is provided in revised JFD13 in Supplement 5.

**HBR ITS 3.2.3, Axial Flux Difference (AFD) (PDC-3 Axial
Offset Control Methodology)**

Revision No. 1
Supplement 7

	DOC or JFD	CTS/STS LCO	Description of Issue	COMMENTS	HBRSEP, No. 2 Response
3.2.3-6	L8	CTS 3.10.2.10	<p>CTS 3.10.2.10 requires that the AFD be logged every hour for the first 24 hours, and half-hourly thereafter, when the AFD alarm is out of service.</p> <p>ITS SR 3.2.3.2 requires a Frequency of once within 15 minutes and every 15 minutes thereafter when THERMAL POWER is > 90% RTP, and once within 1 hour and every 1 hour thereafter when THERMAL POWER is < 90 % RTP.</p> <p>This change is less restrictive in the case that the AFD monitor alarm remains out of service for greater than 24 hours and THERMAL POWER < 90% RTP.</p>	<p>Provide additional justification for change as it relates to the licensing basis and discuss the impact because of differences from the STS power distribution limit methodology</p>	<p>The CTS requirement was imposed by the NRC in Amendment 13 by NRC letter dated October 17, 1975. Amendment 13 incorporated into the CTS the Westinghouse Constant Axial Offset Control (CAOC) methodology. The NRC SER accompanying the amendment evaluates the requirement as acceptable but does not provide any justification for the frequency for obtaining the logs. A review of the docketed correspondence to the NRC did not reveal any CP&L supplied justification for the CTS frequency for obtaining the logs, however, the correspondence does imply that telephone conversations were made between CP&L and the NRC. The CTS frequency appears to not make sense unless CP&L requested informally that a relaxed frequency for the first 24 hours be granted based upon anticipation that a "yet to be installed" AFD monitor could have frequent short periods of inoperability causing undue burden on the Control Room staff. The frequency was retained without modification when the CTS was modified to accept Siemens Power Corporation fuel and analyses. The ITS Frequency for SR 3.2.3.2 when the AFD monitor is out of service is more appropriate for the PDC-3 Axial Offset Control Methodology based on engineering judgement.</p>

ITS SECTION 3.3, "INSTRUMENTATION"
H.B. ROBINSON STEAM ELECTRIC PLANT UNIT NO. 2

Revision 1
 Supplement 7

ITEM #	DOC# or JFD#	CTS/STS LCO	Description of Issue	COMMENTS	HBRSEP, Unit No.2 Response
3.3.6-3	JFD58	STS 3.3.6	STS 3.3.6 Condition/Required Action A is deleted from ITS 3.3.6. No justification is provided for this change.	Provide justification for this STS deviation based on system design, operational constraints, or the need to preserve the current licensing basis.	Justification is provided in revised JFD58 in Supplement 4.
3.3.6-4	JFD58	STS 3.3.6	STS 3.3.6, Required Action C.1, "Place and maintain containment purge and exhaust valves in closed position," is modified in ITS 3.3.6, Required Action A.1, to "Place and maintain containment purge supply and exhaust valves in closed position." The word "supply" does not appear in either the CTS or the STS and no justification is provided for this change. Note: The STS use of "purge and exhaust" is replaced with "ventilation" in the ITS.	Provide justification for this STS deviation based on system design, operational constraints, or the need to preserve the current licensing basis.	Justification is provided in revised JFD58 in Supplement 4.
3.3.6-5	JFD58 A23	STS 3.3.6	STS Table 3.3.6-1, Item 4, Containment Isolation - Phase A, is deleted in ITS Table 3.3.6-1. No justification is provided for this STS deletion. JFD 50 discusses common SR to ESFAS and LCO 3.3.6. This appears to be a rationale for including Phase A isolation signals as a reference in Table 3.3.6-1.	Provide justification for this STS deviation based on system design, operational constraints, or the need to preserve the current licensing basis.	As stated in the bases (i.e., LCO section) containment ventilation isolation receives its manual initiation from the Containment Isolation Phase A manual initiation. The Actuation logic receives input from the manual Containment Isolation Phase A signal, the containment radiation monitors, and from Safety Injection. The automatic actuation logic from the Containment Isolation Phase A function has no input to containment ventilation isolation.

**HBR ITS 3.5.1, ACCUMULATORS
- MODES 1, 2 AND 3 (>1000 psig)**

Revision 1
Supplement 7

Item #	DOC or JFD	CTS/STS LCO	Description of Issue	COMMENTS	HBRSEP No. 2 Responses
3.5.1-1	A14 JD3	CTS 3.3.1.1.g 3.3.1.2.f STS SR 3.5.1.5	CTS 3.3.1.1.g requires removal of control power from a accumulator isolation valves at > 1000 psig. CTS 3.3.1.2.f allows restoration of power to one valve for testing or maintenance for a period of four hours. ITS SR 3.5.1.5 includes a note that allows control power to be restored to one accumulator isolation valve for no more than four hours. The note also refers to similar allowances for other ECCS valves. This note is not contained in the corresponding STS SR.	<p>1) You state in DOC A14 that the allowance to restore power to one valve permitted by CTS 3.3.1.2.f is not explicitly retained in the ITS. However, both the clean copy of the proposed ITS and the markup of NUREG-1431 indicate that this allowance is retained as a Note to ITS SR 3.5.1.5. JFD 3 also addresses this Note as being added consistent with the current licensing basis.</p> <p>2) It is not clear why the addition of the note to SR 3.5.1.5 is needed since, as stated in DOC A14, the completion time for Required Action B.1 would allow 4 hours for this same circumstance without the note.</p> <p>3) The note as is can cause confusion because it also addresses other ECCS valves for which requirements are contained in a separate specification. There is no reason for these other allowances in a note for an SR that only addresses accumulator valves.</p> <p>Provide additional explanation as to why the note is necessary. If the decision is made to retain the note, please revise the note to address the accumulator valves only.</p>	<p>1) DOC A14 is eliminated and the CTS markup is revised in Supplement 5 to indicate this provision is retained.</p> <p>2)The provision to restore power or air to one valve for the specified time does not permit repositioning the valve. With power or air restored to an accumulator isolation valve (valve remains in open position), the accumulator remains capable of injecting. In this circumstance, it is not necessary to enter Condition B.1. This Note retains the CLB which permits restoring power to an accumulator valve for testing or maintenance without rendering the associated accumulator inoperable.</p> <p>3)Since only one of the specified valves is permitted to have air or power restored, the Note is structured to be applied consistently to each SR which includes the specified valves. These valves are addressed in several specifications, but the Notes provision (i.e., only one valve) apply collectively to the entire population of valves specified. The Note is structured in a manner and with appropriate Bases to minimize the potential for confusion.</p> <p>JFD 3 is modified in Supplement 5 to provide this additional clarification.</p>

Comment #	DOC or JFD	CTS/STS LCO	Description of Issue	Comments	HBRSEP, Unit No. 2 Response
3.6.1-4	A 22	CTS 1.7.e SR 3.6.1.1	CTS 1.7.e requires the containment uncontrolled leakage satisfy specified leakage limits. The licensee states that this requirement is not retained in the ITS, since it is encompassed within the definition of OPERABLE for the containment. This justification is in error. ITS SR 3.6.1.1 specifies the leakage limits for containment. Therefore, CTS 1.7.e is encompassed by this SR and is retained in the ITS.	Justification needs to be corrected to reflect this aspect.	DOC A22 is revised in Supplement 7 to state that CTS 1.7.e is encompassed within SR 3.6.1.1 and 3.6.1.3.
3.6.1-5	L 13 JFD 3 Bases JFD 26	CTS 3.6.1 LCO 3.6.1, ACTION A	A condition which permits the containment to be inoperable for up to 4 hours due to inoperable containment isolation valves is added to Condition A to ITS 3.6.1. The licensee states that this condition is necessary to establish consistency with the four hours permitted for an inoperable containment isolation valve. This ACTION statement is unnecessary and generic. ITS 3.6.3 specifies the action to be taken for inoperable containment isolation valves and ACTIONS Note 4 refers to ITS 3.6.1 ACTIONS only in the event that the inoperable valve results in containment leakage being exceeding.	Delete new ACTION A and associated Bases. Delete or revise justification L 13 as necessary.	In accordance with the NRC comment, the subject Action A is eliminated. Subsequent Actions are appropriately renumbered. Associated Bases are revised accordingly. DOC L13 and JFD 3 are eliminated. Bases JFD 26 is eliminated. These changes to the submittal are incorporated into Supplement 2.

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
TECHNICAL SPECIFICATIONS CHANGE REQUEST TO CONVERT TO THE
IMPROVED STANDARD TECHNICAL SPECIFICATIONS

DETAILED DESCRIPTION OF SUPPLEMENT 7

The purpose of Supplement 7 is discussed in the paragraphs below arranged in order of Improved Technical Specifications (ITS) section.

ITS Section 1.0, "Use and Application"

Discussion of Changes (DOC) A7 was revised to indicate that the impact on the changes in the definition of refueling operations is evaluated in the applicable Limiting Condition for Operations (LCOs).

LCO 3.1.6, "Control Bank Insertion Limits"

The allowed outage time to restore control banks to within limits if the insertion limits are not met was revised from 2 hours to one (1) hour to restore the time to the current licensing basis. Applicable markup pages, discussions and bases were changed accordingly.

LCO 3.2.3, "Axial Flux Difference (AFD) (PDC-3 Axial Offset Control Methodology)"

Paragraph (a) is changed from "the target values are specified in the COLR" to "the allowable values of the target band are specified in the COLR." This change is to ensure maintenance of the current licensing basis and consistency with the PDC-3 methodology. Applicable markup pages and discussions were changed accordingly.

LCO 3.3.1, "Reactor Protection System Instrumentation"

The setpoint for low reactor coolant loop flow was revised in accordance with a recent calculation performed in accordance with the Company Setpoint Methodology Procedure.

During development of a summary table of more and less restrictive changes to the Current Technical Specifications (CTS), errors were found in the markup of the CTS pages and have been corrected in this supplement as follows. ACTION 6 was corrected to reference ITS Condition N for the low reactor coolant flow function; Column 2 of CTS Table 3.5-2, "Reactor Trip Instrumentation Limiting Operating Conditions," was deleted; ACTION 7, which is not referenced by any LCO in Table 3.5-2 was deleted and references to ACTION 7 in the markups and DOCs were corrected; and, the CTS markup was corrected to reference ITS Section 3.3.2, "Engineered Safety Features Actuation System (ESFAS)

Instrumentation," for containment and steam generator pressure requirements that were originally relocated in ITS Section 3.3.1 DOC LA4.

Table 3.3.3-1 Note (a) is clarified to state "with reactor trip breakers closed, and either rods not fully inserted, or Rod Control System capable of rod withdrawal." The Bases were revised consistent with the company setpoint methodology procedure which assures that the Limiting Safety System Setting is bounded by the Allowable Values and is not the trip setpoint. Additional information justifying a Note to Surveillance Requirement (SR) 3.3.1.7 was provided.

LCO 3.3.2, "Engineered Safety Features Actuation System (ESFAS) Instrumentation"

A note to Actions permitting delayed entry into ACTIONS for a single inoperable ESFAS train for maintenance purposes is deleted and the allowed outage time for a single inoperable train was increased from six (6) hours to 12 hours. Applicable markup pages, discussions and bases were changed accordingly.

References in the markups were corrected to reflect existing CTS requirements for containment and steam generator pressure. No specification changes were made; however, new less restrictive DOCs (i.e., L51 and L52) were added including information in support of a no significant hazards conclusion.

During NRC review of the submittal, it was recognized that text was missing and duplicated associated with certain changes to the DOCs included with earlier supplements. To assure completeness of information, the entire DOCs for Section 3.3 are included in Supplement 7. Only the changes associated with Supplement 7 are identified by a side bar in the right hand margin.

Information was included in the Bases to justify the Note to SR 3.3.1.7.

LCO 3.3.5, "LOP DG Start Instrumentation"

Surveillance requirement (SR) 3.3.5.2 was revised to state setpoint tolerances rather than allowable values. The bases were revised to change paragraph titles from "...Allowable Values" to "...Setpoint Tolerances."

LCO 3.3.6, "Containment Ventilation Isolation Instrumentation"

The applicability for functions 1 and 2 was modified by adding Note (c), "during purging." Function 4 was corrected to reference the Safety Injection System Function (i.e., ITS Table 3.3.6-1, Function 4). Applicable markup pages, discussions and bases were changed accordingly.

LCO 3.3.7, "Control Room Emergency Filtration System (CREFS) Actuation Instrumentation"

Action B.1.2 to reference the specification for an inoperable CREFS train and enter the actions for that specification, and Action B.2 to place both trains in emergency mode were deleted as unnecessary. Since placing one train in emergency mode ensures that the system remains OPERABLE in the event of a single failure, no further actions are required. Additionally, a Note to Applicability included in Supplement 6 to exempt applicability for movement of irradiated fuel in the spent fuel shipping cask was removed. Applicable markup pages, discussions and bases were changed accordingly.

LCO 3.3.8, "Auxiliary Feedwater (AFW) System Instrumentation"

The Required Actions were revised to preserve the allowed outage time of 4 hours contained in the current licensing basis for the undervoltage reactor coolant pump trip function. A review of the trip function to WCAP 10271-P-A found that the trip function (i.e., two-out-of-two) differs from the assumed redundancy of the trip function in WCAP 10271-P-A (i.e., two-out-of-three), and therefore, extending the allowed outage time from 4 hours to 6 hours is not bounded by the analyses contained in WCAP 10271-P-A. Applicable markup pages, discussions and bases were changed accordingly.

Note (a) was added to the allowable values column which applies to Function 3, "Loss of Offsite Power," which utilizes a setpoint tolerance rather than an allowable value.

Bases LCO 3.4.6 "RCS Loops-MODE 4 and Bases 3.4.8 "RCS Loops-MODE 5, Loops Not Filled"

The bases were clarified editorially in accordance with an NRC comment.

LCO 3.4.16, "RCS Specific Activity"

During development of a summary table of more and less restrictive changes to the Current Technical Specifications (CTS), an error in the markup and DOCs was found which did not discuss the CTS change in a required action with respect to gross activity. No specification or bases changes were required, and applicable markup pages and discussions were changed to correct the error.

LCO 3.4.17, "Chemical and Volume Control System"

The proposed allowed outage time for charging pumps allowed outage time was restored to 24 hours. Applicable markup pages, discussions and bases were changed accordingly. Editorial changes were made to the specification and bases to refer to only one seal injection limit, and to clarify restoration of boron addition pathways in the bases to Required Action B.1.

Information relating to boron addition to the RCS was deleted from the Background section of the bases.

Additional Changes Relating to ITS Section 3.4, "Reactor Coolant System"

Additional justification was added in DOC LA5 for relocating a requirement to lock closed manual valves utilized to isolate a high pressure line containing inoperable Pressure Isolation Valves (PIVs).

An editorial correction to DOC L1 was made. A reference to the Updated Final Safety Analysis Report (UFSAR) was added to a Justification for Differences (JFDs) with NUREG-1431, Revision 1, "Standard Technical Specifications - Westinghouse Plants," (i.e., ISTS) that indicates the applicable UFSAR sections describing Residual Heat Removal System code requirements.

Supplement 3 was submitted concurrent with a separate request for change to the Technical Specifications by letters dated April 25, 1997. Revised markup pages associated with Part 4, "Markup of NUREG-1431, Revision 1, 'Standard Technical Specifications - Westinghouse Plants,' (ISTS)" and Part 6, "Markup of ISTS Bases," have been included in this supplement with a reference to a JFD in order to maintain consistency with ITS conversion guidelines.

LCO 3.5.2, "ECCS-Operating"

An incorrect reference to ITS Section 3.3.2 was removed from the top of CTS markup page 4.5-2 (ITS 3.5.2).

Note 1 was changed to allow one cold leg safety injection pump flow path to be isolated for up to 24 hours for PIV testing to conform with the new procedure methodology, which does not require more than one flow path to be isolated. The words "entry and" were deleted from Note 2. A note allowing a different American Society of Mechanical Engineers (ASME) Boiler & Pressure Vessel (B&PV) Code test method for the ECCS pumps than that stated in the surveillance requirement was deleted, and the frequency was changed to 18 months, which is consistent with the current Inservice Testing (IST) program.

Action B was corrected to state SR 3.5.2.1 "or" SR 3.5.2.7 rather than "and" in order to clarify that only one valve among the two surveillance requirements can have the control power or air restored. Applicable markup pages, discussions and bases were changed accordingly.

Discussion of change DOC M16 was added which was inadvertently omitted from a previous supplement.

LCO 3.6.1, "Containment"

Applicable markup pages were revised to reflect reference to SR 3.6.1.1 and SR 3.6.1.3 in the CTS definitions and to reflect the surveillance requirement for containment tendons in CTS Section 4.4.4.3.

Bases 3.6.2, "Containment Air Lock"

The bases for the containment air lock were revised to reference 10 CFR 50, Appendix J for the containment leakage acceptance criteria rather than the Containment Leakage Rate Testing Program.

LCO 3.6.3, "Containment Isolation Valves"

Surveillance Requirement (SR) 3.6.3.2 was changed to move the Note to the frequency column for 3/8 inch valves and to require an 18 month frequency for the 3/8 inch valves. Applicable markup pages, discussions and bases were changed accordingly.

Bases 3.6.5, "Containment Air Temperature"

The bases for SR 3.6.5.1 were changed to reference an volumetric average, to be consistent with what is described in the remainder of the bases.

Bases 3.6.7, "Spray Additive System"

The bases to Action A.1 were changed to be consistent with the specification. Clarifications were added to DOCs and JFDs associated with LCO 3.6.7 Required Action A.1 to distinguish the Spray Additive System from Spray Additive System trains.

LCO 3.7.4, "Auxiliary Feedwater (AFW) System"

A note allowing a different ASME B&PV Code test method for the AFW pumps than that stated in the surveillance requirement was deleted, and the frequency was changed to 18 months, which is consistent with the current IST program. Applicable markup pages, discussions and bases were changed accordingly.

Bases to LCO 3.7.8, "Ultimate Heat Sink (UHS)"

The bases were revised to reflect new calculations of the UHS cooling capacity of 22 days and to allow lifting of the tainter gates as necessary for flood control. A clarification was made regarding the maximum post accident heat load.

LCO 3.7.9, "Control Room Emergency Filtration System (CREFS)"

A Note to Applicability included in Supplement 6 to exempt applicability for movement of irradiated fuel in the spent fuel shipping cask was removed. Applicable markup pages, discussions and bases were changed accordingly.

LCO 3.7.10, "Control Room Emergency Air Temperature Control (CREATC)"

A Note to Applicability included in Supplement 6 to exempt applicability for movement of irradiated fuel in the spent fuel shipping cask was removed. Applicable markup pages, discussions and bases were changed accordingly.

LCO 3.7.11, "Fuel Building Air Cleanup System (FBACS)"

A Note to Applicability included in Supplement 6 to exempt applicability for movement of irradiated fuel in the spent fuel shipping cask was removed. Surveillance Requirement (SR) 3.7.11.1 was changed in the typed copy to state that the heaters be run automatically to reflect a change made in an earlier supplement. A note was added to SR 3.7.11.3 to state that the SR does not have to be met when the only movement of irradiated fuel is in the spent fuel storage cask. During movement of spent fuel contained within the spent fuel shipping cask, portions of the Fuel Handling Building roof and wall are removed, and as a result, this new surveillance requirement cannot be met. Applicable markup pages, discussions and bases were changed accordingly.

The markup for CTS Section 4.12.3 was corrected to relocate the surveillance requirement for hourly humidity monitoring of the FBACS because the monitoring is not required to verify operability of the FBACS. Applicable markup pages and discussions were changed accordingly.

LCO 3.8.2, "AC Sources-Shutdown"

A note exempting Required Actions from LCO 3.0.3 was removed. The generic change to NUREG-1431 that resulted in the note has been rejected by the NRC. A Note to Applicability included in Supplement 6 to exempt applicability for movement of irradiated fuel in the spent fuel shipping cask was removed. Applicable markup pages, discussions and bases were changed accordingly.

LCO 3.8.4, "DC Sources Operating"

The bases to SR 3.8.4.6 were revised to be consistent with the applicable revision of the referenced Institute of Electrical and Electronic Engineers (IEEE) standard.

LCO 3.8.5, "DC Sources-Shutdown"

A note exempting ACTIONS from LCO 3.0.3 was removed. The generic change to NUREG-1431 that resulted in the note has been rejected by the NRC. A Note to Applicability included in Supplement 6 to exempt applicability for movement of irradiated fuel in the spent fuel shipping cask was removed. Applicable markup pages, discussions and bases were changed accordingly.

LCO 3.8.8, "AC Instrument Buses-Shutdown"

A note exempting ACTIONS from LCO 3.0.3 was removed. The generic change to NUREG-1431 that resulted in the note has been rejected by the NRC. A Note to Applicability included in Supplement 6 to exempt applicability for movement of irradiated fuel in the spent fuel shipping cask was removed. Applicable markup pages, discussions and bases were changed accordingly.

LCO 3.8.10, "Distribution Systems-Shutdown"

A note exempting ACTIONS from LCO 3.0.3 was removed. The generic change to NUREG-1431 that resulted in the note was rejected by the NRC. A Note to Applicability included in Supplement 6 to exempt applicability for movement of irradiated fuel in the spent fuel shipping cask was removed because the note was rejected by the NRC during review. Applicable markup pages, discussions and bases were changed accordingly.

LCO 3.9.3, "Containment Penetrations"

Applicable markup pages and discussions were changed to reflect the less restrictive change to applicability of containment penetrations requirements during refueling. The markup of CTS Sections 3.8.2.d and 4.12.3 were corrected to refer to SR 3.9.7.1.

ITS Section 5.5.12, "Explosive Gas and Storage Tank Radioactivity Monitoring Program"

Section 5.5.12.b was revised to restore the current licensing basis for outdoor liquid radwaste tanks not surrounded by liners, dikes, or walls capable of holding the tanks' contents and that do not have tank overflows and surrounding area drains connected to the Liquid Waste Disposal System.

ITS 5.7.2, "High Radiation Area"

The text was revised from "inadvertent" to "unauthorized" entry with respect to the requirement to provide locked doors.