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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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August 30, 1996
G02-96-172

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21
COMMENTS ON DRAFT SAFETY EVALUATION OF PROPOSED
IMPROVED TECHNICAL SPECIFICATIONS**

- References:
- 1) Notice GI2-96-186, dated July 22, 1996, NRC to Supply System, "Meeting Summary - Open Issues for Conversion to Improved Standard Technical Specifications"
 - 2) Letter GI2-96-192, dated August 2, 1996, TG Colburn (NRR) to JV Parrish (SS), "Request for Additional Information for the Washington Public Power Supply System (WPPSS) Nuclear Project No. 2 (WNP-2)"
 - 3) Letter GO2-95-265, dated December 8, 1995, JV Parrish (SS) to NRC, "Request for Amendment to Technical Specifications"
 - 4) Letter GO2-96-132, dated July 9, 1996, PR Bemis (SS) to NRC, "Request for Amendment to Technical Specifications"
 - 5) Letter GI2-96-189, dated July 26, 1996, TV Wambach (NRR) to JV Parrish (SS), "Draft Safety Evaluation of Proposed Improved Technical Specifications, Washington Public Power Supply System Nuclear Project No. 2"
 - 6) Letter dated August 1, 1996, GI Grimes (NRR) to J Davis (NEI) "The Modified Status Report of STS, Revision 2 Changes"

The Supply System initiated a WNP-2 program for the conversion to Improved Technical Specifications (ITS) in the fall of 1994, submitting the Technical Specification Change Request (TSCR) in December 1995. The NRC staff has conducted the review of this TSCR differently from previous ITS submittals by using a team of reviewers rather than one reviewer with primary responsibility for the completion of the safety evaluation (SE). The staff also assigned a project manager (PM), Mr. TV Wambach, to coordinate the review activities. The original schedule developed by the team planned for the draft SE to be issued in May 1996 followed by the final SE in July.

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RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

The proposed six month completion time was not met, but the Supply System believes, considering the scope of the conversion project, that a six month review schedule was very aggressive. The two NUREGs, 1433 and 1434, "Standard Technical Specifications General Electric Plants, BWR-4 and 6" (STS), required several changes in order to develop an ITS for WNP-2, a BWR-5 with a Mark II containment. The industry generic change process has not developed to a level that could support the generic changes identified prior to and during the WNP-2 project, but the staff has been supportive in reviewing the changes on a plant specific basis.

The Supply System notes the thoroughness, quality, and timeliness of the staff review. The good working relationship between the Supply System staff and the NRC staff has resulted in a product that will provide safety enhancements at WNP-2. In view of the many successes of this project, the Supply System recommends that the staff review the feasibility of the estimated six month review schedule for future submittals by other plants.

Reference 1 summarizes the meeting held with members of the NRC staff on June 27, 1996. Eleven appeal issues were considered by Mr. JW Roe. Attachment 1 discusses the 11 items and the proposed Supply System actions for each of the issues. The Supply System will revise the proposed WNP-2 ITS for items 1, 3, 5, and 8. The Supply System is requesting that the staff reconsider the decision reached on item 11.

Reference 2 requested additional information in support of the Supply System request to maintain the emergency diesel generator (EDG) power factor limits in the proposed ITS Bases. The requirement to test the EDGs at a specified power factor represents a surveillance requirement that is not in the current Technical Specifications (CTS). In electing to implement the specifications of the NUREG the Supply System recognized changes in the current requirements would be involved. However, testing the EDGs at the specified power factor represents a restriction that does not provide a commensurate increase in the protection of the health and safety of the public or pertinent operability information about the equipment. The Supply System believes that conformance with the requirement of running the EDGs paralleled to the grid at the accident load power factor would decrease the equipment life and expose the equipment to potential damage. Attachment 2 provides additional details of testing results at WNP-2 and further discussion of the problems encountered.

During a recent telephone conversation, the staff also requested additional information concerning the use of the Residual Heat Removal (RHR) suppression pool spray subsystem to mitigate the chugging phenomena in the suppression pool. The Supply System does not credit the operation of this subsystem to terminate a chugging event or to mitigate the effects of a steam bypass event in the suppression chamber. The subsystem is not credited in the mitigation of a design basis accident or transient. Further detail is provided in Attachment 3.

References 3 and 4 contained the request that the interval for specific surveillances be extended from 18 months to 24 months. In Reference 1, the staff documented the rejection of the request for two surveillances for the Reactor Core Isolation Cooling System (RCIC) based on recent system performance. The equipment failures discussed in Reference 4 were noted during the

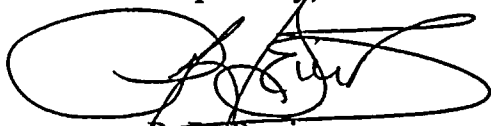
**RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED
TECHNICAL SPECIFICATIONS**

performance of the 18 month surveillance testing. Further review has confirmed that these two equipment failures, and other recent problems, would have also been detected during the testing performed on the 92 day interval. The Supply System requests that the staff reconsider the decision based on the additional information provided in Attachment 4.

Reference 5 transmitted the draft safety evaluation (SE) for the proposed ITS submitted to the NRC in References 3 and 4. Supply System comments and suggested changes will be annotated on a copy of the SE and transmitted to the NRC at a later date. Attachment 5 provides a summary of these comments. Attachment 6 is a list of the remaining open issues identified during the review of the SE and subsequent conversations with the staff. Attachment 6 also describes a proposed resolution for the issues and revisions to the submittal to implement the resolutions.

The resolution of some of these comments will result in further changes to the WNP-2 ITS. In an effort to expedite the final approval of the WNP-2 ITS, the Supply System is proposing a delay in the submittal of Revision C until the comments are resolved. The changes needed to complete Revision C following the resolution of the outstanding comments are not expected to be significant. The Supply System will submit Revision C of the ITS within 3 weeks of the final resolution. This time period will allow final document preparation and reviews by the Plant Operations Committee and the Corporate Nuclear Safety Review Board.

Respectfully,



P. R. Bemis
Vice President, Nuclear Operations
Mail Drop PE23

Attachments

1. Appeal Items
2. Power Factor Testing Requirements
3. Suppression Pool Spray Subsystem
4. RCIC Surveillance Interval
5. Summary of Comments on SE
6. Open Items and Proposed Resolution

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
NS Reynolds - Winston & Strawn (w/o)
TG Colburn - NRR
FS Adair - EFSEC
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927N

RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

Attachment 1

APPEAL ISSUES

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ITEM	ISSUE	NRC POSITION	SUPPLY SYSTEM (SS) RESPONSE OR ACTION
1	LCO 3.3.1.1, (JFD 1) Maintain 12 hr AOT for manual scram functions.	Maintain the same 1 hour AOT for manual and automatic RPS trip functions.	Change manual scram AOT to 1 hour in Rev C. Pursue 12 hour AOT generically.
2	SR 3.8.1.10, SR 3.8.1.14 (JFD 12) Specify DG power factor in Bases rather than SR.	NRC has requested additional information in Reference 2.	Additional discussion provided in Attachment 2.
3	LCO 3.6.1.3, (JFD 8) Restructure action statements for PCIVs.	NRC denied request.	The SS will revise the LCO 3.6.1.3 in Revision C of the ITS. However, to preclude future confusion, the SS will also revise the Bases for the LCO CONDITIONS. The revision will clarify which CONDITION and ACTION are appropriate when SR 3.6.1.3.11 and SR 3.6.1.3.12 are not met. There are no special limits established for the purge valves, so the proposed revision will not list the exclusion of the purge valves in CONDITION A.

RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

Attachment 1
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APPEAL ISSUES

ITEM	ISSUE	NRC POSITION	SUPPLY SYSTEM (SS) RESPONSE OR ACTION
4	SR 3.6.1.5, (R.1) Relocate surveillance for suppression pool spray.	The staff asked for additional information concerning steam bypass and chugging events.	The SS proposed that RHR suppression pool spray subsystem requirements be relocated to the Licensee Controlled Specifications (LCS) manual, because the subsystem did not meet any of the 4 criteria specified in 10 CFR 50.36. Additional information is provided in Attachment 3.
5	LCO 3.6.1.7, (JFD 22) Allow separate condition entry for each vacuum breaker.	Allow separate condition entry for CONDITION B, but not CONDITION C.	The SS will revise LCO 3.6.1.7 to allow separate condition entry for CONDITION B only. The note will be removed from CONDITION C.
6 & 7	SR 3.6.1.7.1, SR 3.6.1.7.2 (JFD 23) Additional surveillances for vacuum breakers that are not in CLB.	The surveillances will not be required by the staff at this time.	No action required by SS.
8	LCO 3.6.2.3, (L.1) Allow an 8 hour AOT for 2 loops of suppression pool cooling.	NRC denied the request.	The 8 hour AOT will be removed in Revision C.

RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

Attachment 1

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APPEAL ISSUES

ITEM	ISSUE	NRC POSITION	SUPPLY SYSTEM (SS) RESPONSE OR ACTION
9	LCO 3.3.6.1, (R.1) Relocated RCIC isolation signal on high drywell with low steam line pressure.	The NRC is reviewing this request.	The SS has requested the relocation of the RCIC isolation function to RCIC- V-110 and RCIC-V-113 because the function does not meet any of the 4 criteria in 10 CFR 50.36.
10	DF 4.3.1.1.a, DF 4.3.1.2.a (JFD 3 & 5) Delete maximum average enrichment limit from TS.	NRC will not require this to be added to WNP-2 ITS.	No action required by the SS.
11	SR 3.5.3.4 Extend RCIC SR to 24 months.	Performance results in 1995 do not support extension of SR interval.	The SS requested that 2 RCIC surveillance requirements be extended from 18 month to a 24 month frequency. At the meeting the SS agreed to withdraw the request. However, after further evaluation, the SS requests that the staff reconsider their decision. Additional information in support of that request is included in Attachment 4.

RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

Attachment 2
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POWER FACTOR TESTING REQUIREMENTS

The WNP-2 Division 1 and Division 2 emergency diesel generators (EDG-1 and EDG-2) are rated 5812 KVA at 0.8 power factor, nameplate. Each EDG provides emergency power to a separate 4160 VAC safety bus. The static exciter voltage regulators (SEVR) and each emergency generator for EDG-1 and EDG-2 were manufactured by NEI Peebles in the early 1970's. At rated EDG output, each SEVR is designed for a maximum excitation current of 142.4 amps DC, with a short time capability of 149.0 amps for 30 minutes.

The excitation system rating applies whether the EDG is running isolated on the safety bus or in parallel with an offsite source. The offsite grid typically runs at higher voltages than the safety bus normal operating voltage of 4160 VAC. Power factor testing was performed during the last refueling outage (R11). During the testing, the grid voltage was 4300 VAC during EDG-1 testing and 4250 VAC during EDG-2 testing, measured at the safety bus potential transformers. When the grid voltage is high, the EDG excitation system must provide more field excitation current in order to reach the voltage required to successfully synchronize to the grid. This reduces the margin available to adjust the KVAR loading on the EDG, when operating in parallel with the grid, to the required power factor before the maximum current limits of its excitation system are reached.

If the EDG is operating at or near the limits of the SEVR during a test run and a transient or swing in grid reactive load flow occurs, the capabilities of the SEVR will be challenged, contributing to premature failure. Other distribution system transients associated with spurious opening of an upstream non-safety related breaker during a test run with the SEVR operating at or near the rated limit would also reduce the life expectancy of the equipment.

During emergency operation running on an isolated bus, the EDG voltage will be a nominal 4160 VAC, as compared to operating in parallel with the offsite grid when generator voltage has been in excess of 4400 VAC. The difference in line voltage and required excitation current to synchronize and load the EDG is a direct result of auxiliary station service transformer tap settings, distribution system loading and the difference in the relative excitation of the grid to the WNP-2 small EDG.

Results from the power factor tests performed during R11 are tabulated below. In each test, the limit of the SEVR, provided by the generator manufacturer, was reached before the specified power factor was obtained. This is a direct result of high voltage and reactive load flow demands on the offsite grid.

RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

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POWER FACTOR TESTING REQUIREMENTS

If EDG-1 or EDG-2 were operating at the power factors specified in the proposed ITS Bases, a slight fluctuation on the grid could cause the SEVR to exceed the current limit established by the manufacturer. For example, a reactive swing on the grid of 600 KVAR was experienced during the testing of EDG-1 that caused the EDG excitation current output to exceed the continuous rating of 142.4 amps DC. This situation was quickly noticed by the operators (since data was being recorded at regular intervals for testing purposes), and the loading on the SEVR was reduced to within the ratings of the unit before any damage had occurred.

Running an EDG in parallel with an offsite power network at high voltages, loaded to "simulate" emergency loads, does not provide any additional information about the capability of the equipment to carry actual emergency loads on an isolated safety bus. This is an unacceptable level of risk to which the EDG should not be routinely exposed.

RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

Attachment 2
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POWER FACTOR TESTING REQUIREMENTS

DG 1 TEST RESULTS

4400 KW

KVAR Setting	Power Factor	DC Field Amps
1400 Out	.95	125.9
1600 Out	.94	128.6
1800 Out	.92	131.8
2000 Out	.91	134.5
2200 Out	.89	137.2

At 4400 KW and 2700 KVAR Out, the Field Current was 142.2 amps.

4650 KW

KVAR Setting	Power Factor	DC Field Amps
1400 Out	.96	125.0
1600 Out	.94	129.2
1800 Out	.93	131.2
2000 Out	.92	134.0
2200 Out	.90	137.6

At 4650 KW and 2600 KVAR Out, the Field Current was 142.3 amps.

RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

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POWER FACTOR TESTING REQUIREMENTS

DG 2 TEST RESULTS

4050 KW

KVAR Setting	Power Factor	DC Field Amps
1400 Out	.95	132.3
1600 Out	.93	135.2
1800 Out	.91	138.0
2000 Out	.90	140.8
2200 Out	.88	143.3

4400 KW

KVAR Setting	Power Factor	DC Field Amps
1400 Out	.95	133.7
1600 Out	.94	136.8
1800 Out	.92	139.6
2000 Out	.91	141.9
2200 Out	.89	145.3

At 4400 KW and 2050 KVAR Out, the Field Current was 142.9 amps.

4650 KW

KVAR Setting	Power Factor	DC Field Amps
1400 Out	.96	134.8
1600 Out	.94	137.8
1800 Out	.93	140.9
2000 Out	.92	143.8
2200 Out	.90	**

At 4650 KW and 1950 KVAR Out, the Field Current was 142.3 amps

** Not performed due to Field Current limitations

RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

Attachment 3

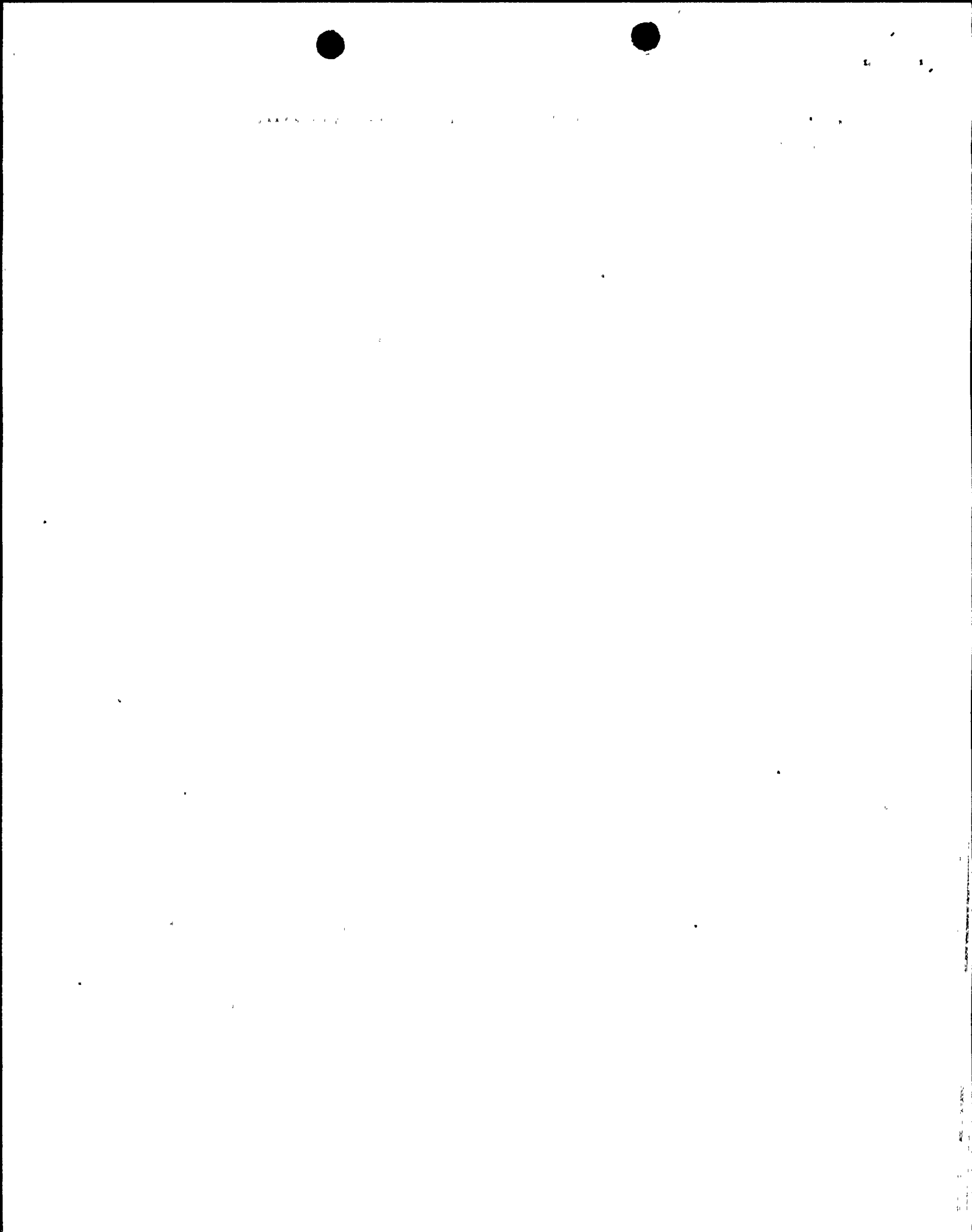
SUPPRESSION POOL SPRAY SUBSYSTEM

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The postulated use of suppression pool spray in response to the chugging phenomena is based on BWR Owners Group (BWROG) evaluation of chugging data from the 4TCO and JAERI test facilities and its application to Mark II containments. The NRC staff has reviewed several of the reports describing results from these test facilities. It is not known if the specific document, Reference A, used for this discussion was included in those reviews. The document was published as part of Task A.26 of the BWROG Mark II Containment Program. This is a proprietary document and is available upon request for staff review. The efforts of the BWROG and the NRC resulted in the approval of NEDO-216061, "Mark II Containment Dynamic Forcing Functions, Information Report." The staff documented the acceptance of the data from the 4TCO and JAERI testing for the derivation of the load specifications for WNP-2 in Reference B.

The NRC has questioned if the duration of the chugging phenomena is dependent on the use of suppression pool spray, thereby requiring the sprays as part of the WNP-2 design basis for the primary containment. The Supply System review of the referenced test data verified that the suppression pool spray is not credited in the chugging analysis for a reduction in the duration (and hence, number of fatigue cycles) during a design basis loss of coolant accident (LOCA).

For small break LOCAs, the duration of blowdown can be long. However, the test data has shown that for small vent steam mass flux values, chugging is not a concern. Experimental data has shown this threshold value is $0.3 \text{ lbm/ft}^2\text{-s}$. The time for which the mass flux value remains above the threshold for a given break size was assessed. Both steam and liquid were considered; steam line breaks bound the liquid line breaks due to the short duration of the liquid break. A spectrum of break sizes were analyzed for the most limiting plant which bounds the WNP-2 design. Suppression pool cooling is assumed to be initiated within 10 minutes after the suppression pool temperature exceeds the Technical Specifications limit. High pressure systems are available for makeup, while MSIV closure will render the feedwater system unavailable. Manual depressurization of the reactor is also initiated when the suppression pool temperature reaches the Technical Specifications limit. The assumed depressurization rate was the 100° F/hour limit allowed by Technical Specifications. The analysis was terminated when the mass flux dropped below the threshold value. Even ignoring other phenomena (e.g., condensation oscillation) with an assumed duration from initial break to time the vent steam mass flux is less than $0.3 \text{ lbm/ft}^2\text{-s}$, the maximum duration for the complete spectrum of breaks is less than 2000 seconds. At no time was suppression pool spray credited for cooldown, depressurization, or suppression pool cooling.



RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

Attachment 3

SUPPRESSION POOL SPRAY SUBSYSTEM

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Section 6.2.1.1.5.4 of the FSAR provides the analytical results for the steam bypass event. The FSAR analysis credits manual initiation of drywell spray once drywell pressure exceeds 30 psig. Although the Emergency Operating Procedures (EOPs) direct the initiation of suppression pool spray earlier in the event, the analysis of the event does not credit the initiation of suppression pool spray. This analysis is documented in Supply System report WPPSS-74-2-R5 (Reference C). This position was also communicated to the staff in References D and E.

The termination or the mitigation of a chugging event is not dependent on the use of suppression pool spray, nor is suppression pool spray credited in the analysis for mitigation of the steam bypass event. The use of suppression pool spray is directed in the EOPs for containment pressure control. The WNP-2 containment design has been evaluated to verify that inadvertent initiation of containment (drywell or suppression pool) sprays will not challenge the containment integrity. Therefore, the use of the containment spray is consistent with the guidance provided in the Emergency Procedure Guidelines as reviewed by the staff (Reference F) and is bounded by the plant design.

REFERENCES:

- A. "Evaluation of High-Frequency Chugging Data in the 4TCO and JAERI Test Facilities," by JR Fitch of the General Electric Company
- B. Safety Evaluation Report related to the operation of WPPSS Nuclear Project No. 2, NUREG 0892, Supplement Number 1, dated August 1982
- C. Letter GO2-74-17, dated August 9, 1974, JJ Stein (SS) to A Giambusso (US AEC), "Post Construction Permit Item Transmittal of Report WPPSS-74-2-R5 Report on Drywell-Wetwell Leakage"
- D. Letter GO2-76-156, dated April 23, 1976, DL Renberger (SS) to NRC, "Post-Construction Permit Item Drywell/Wetwell Leakage Study"
- E. Letter GO2-82-804, dated September 24, 1982, GD Bouchey (SS) to A Schwencer (NRC), "Concerns Regarding Adequacy of Design Margin of Mark II Containment System"
- F. Safety Evaluation of "BWR Owners' Group - Emergency Procedure Guidelines, Revision 4," NEDO-31331, March 1987 dated September 12, 1988

RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

Attachment 4

RCIC SURVEILLANCE INTERVAL

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In accordance with the guidance provided in Generic Letter 91-04, "Changes in Technical Specification Surveillance Interval to Accommodate a 24-Month Fuel Cycle," the Supply System requested that specific surveillance frequencies be changed from 18 months to 24 months to accommodate a two year maintenance cycle. The staff denied the request for a 24 month surveillance frequency for RCIC (SR 3.5.3.4 and 5) based on recent maintenance history. In a meeting with the staff, the Supply System accepted this decision. Upon further evaluation the Supply System requests reconsideration. The extension of the surveillance interval would not invalidate any assumptions in the plant licensing basis or contribute to a condition that is detrimental to public health and safety.

As discussed in Reference 4, the procedure PPM 7.4.7.3.6 is performed to satisfy the 18 month current Technical Specifications (CTS) surveillance requirements of 4.7.3.c.1, 4.7.3.c.2, and 4.7.3.c.3 for the Reactor Core Isolation Cooling (RCIC) system. These requirements include the system functional test (c.1) and the automatic suction transfer (c.3), in addition to the low steam pressure pump flow test (c.2). The procedure is also performed to satisfy the RCIC Logic System Functional Testing requirement in CTS 4.3.5.2. Performance of individual sections within the procedure can be completed, without the completion of the entire procedure, to satisfy the individual Technical Specification surveillance requirements. The surveillance has typically been performed as the plant prepares to shutdown for the annual refueling outage.

If maintenance or modifications are performed on the RCIC system that could impact the operability of the system, the appropriate post maintenance testing (PMT) is completed before declaring the system operable.

Procedure PPM 7.4.7.3.6 has been performed 13 times and has yielded unsatisfactory results on only 2 occasions when the testing was suspended due to a degraded component. The exceptions were discussed in Reference 4. Additional clarification of the component failures and discussion of other Supply System practices that would have identified the equipment problems are provided below.

On April 22, 1995, PPM 7.4.7.3.6 was performed during the shutdown for the annual refueling outage. The test was performed at normal operating pressure to satisfy CTS 4.7.3.c.1 and 4.7.3.c.3. The RCIC turbine was manually tripped when it was noted that RCIC-PCV-15 had failed. The testing was suspended, a problem evaluation report (PER) was initiated, and the pressure control valve was recalibrated. The test was repeated successfully on June 16, 1995 during startup. It should be noted that there were no failures of the logic system function portions of this test. Although the RCIC system was declared inoperable because of the problem

RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

Attachment 4

RCIC SURVEILLANCE INTERVAL

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with the pressure control valve, the system had not failed to satisfy the requirements of CTS 4.7.3.c.1 and 4.7.3.c.3. The three surveillance requirements in 4.7.3.c remained current and the failure of the pressure control valve did not invalidate compliance with these requirements.

Procedure PPM 7.4.7.3.3B is performed to satisfy the quarterly surveillance requirement CTS 4.7.3.b. This procedure is performed at normal reactor pressures; while portions of PPM 7.4.7.3.6 are performed with a steam pressure between 150 and 165 psig. The pressure control valve, RCIC-PCV-15, is only challenged under high pressure conditions and the problem would have been identified during the performance of the high pressure portions of PPM 7.4.7.3.6 or the quarterly performance of PPM 7.4.7.3.3B. Running the system during a PMT would have also identified the problem with RCIC-PCV-15.

On June 10, 1995, during plant start up, testing was again suspended during the performance of PPM 7.4.7.3.6 due to an intermittent electronic overspeed trip signal. The RCIC turbine tripped on overspeed during the high pressure portion of the testing, following the successful completion of the portion required to satisfy CTS 4.7.3.c.2. The trip was initially thought to be due to the system configuration and not a component problem, and plant startup continued. Because adequate steam pressure had been developed, the 12 hour clock had started for CTS 4.7.3.b (the quarterly test) and performance of the operating pressure portions of PPM 7.4.7.3.6 (the 18-month test) were postponed. During the performance of PPM 7.4.7.3B, the turbine tripped a second time at a speed different than that during PPM 7.4.7.3.6. A PER was initiated and the subsequent troubleshooting identified a spurious failure within the Airpax overspeed monitor. Plant startup was delayed until RCIC operability was restored. A Temporary Modification Request (TMR) was implemented to deactivate the electronic overspeed trip mechanism. The testing was resumed; PPM 7.4.7.3.6 was successfully completed on June 16 and PPM 7.4.7.3B was successfully completed on June 19. There were no failures of the logic system function portions of this test. Thus the intermittent failure could have become evident during any testing of the RCIC system which required operation of the turbine.

The Supply System procedures and processes have been successful in identifying numerous component deficiencies which resulted in the unacceptably low RCIC system "availability." These deficiencies included, but are not limited to, cycling of the minimum flow valve, notching of the speed controller ramp generator, corrosion inhibiting the proper operation of the vacuum pump discharge check valve, aeration of the governor control/lube oil system, and a partially blocked vacuum breaker exhaust line. The quarterly operability test performed under PPM 7.4.7.3.3B has identified the majority of the RCIC component problems and is typically used as the high pressure PMT following work on the system.

RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

Attachment 4

RCIC SURVEILLANCE INTERVAL

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The PER process and Maintenance Rule program combine to form an effective compliment to surveillance testing. Each program evaluates functional failures, determines operability, and provides corrective actions to prevent reoccurrence. Repetitive failures require additional corrective action in both processes, and provide an effective means of maintaining equipment reliability.

The extension of the interval for the system functional tests, the low pressure test, and the logic system functional test will not impact the ability of the Supply System to identify problems in the RCIC system. The staff correctly noted during the June meeting that there was no maintenance history available to support the conclusion that the modifications performed had successfully resolved the failures identified during the 18 month interval surveillance testing. However, any further failures of these components will be identified during testing that is required to be performed more frequently. As component deficiencies are identified, the problems are investigated for root cause and generic impact and corrective actions are implemented in accordance with the WNP-2 corrective action program.

In summary, the failures identified during the performance of PPM 7.4.7.3.6 would have been detected as part of other existing Supply System practices, including more frequently performed Technical Specification Surveillance testing, and were not unique to the system configuration established during the low pressure or system functional testing. Based on consideration of the favorable 18 month surveillance test history, in conjunction with the additional functional testing performed quarterly, the Supply System has concluded that the test interval extension to as many as 30 months is justified.

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GENERAL

During the review of the Draft SE, the Supply System noted that the different sections of the SE were not prepared in the same format or with consistent content. Because the acceptance documentation of the ITS conversion is important to the Supply System, comments are being provided in an effort to provide a more consistent presentation of content. Editorial comments on format or structure have been limited.

Of specific concern to the Supply System were the instances where similar justifications were used in different sections of the Discussion of Changes (DOC), Volumes 5 and 6 of the ITS submittal, but the reviewers did not always agree on the "significance" of the changes. If the justification and acceptance of a change was discussed as significant in one section, a similar discussion has been added to those sections in which a similar change was identified as not significant or below threshold.

In some instances, the reviewer changed the classification of some of the changes; e.g. Administrative to Less Restrictive, and provided an evaluation that was inconsistent with the evaluation provided by the Supply System and, in some instances, inconsistent with plant design or practices. The more significant examples are listed in Attachment 6 with a proposed resolution.

The request to extend surveillance intervals from 18 to 24 months was designated as an "LD" in the DOC. The acceptance of these DOCs is documented differently in various sections. Section III includes a general discussion of the acceptance of the interval extension that is referenced in some sections of the SE. However, there are instances where the general discussion is not referenced and the justifications differ.

The requests to change Allowable Values for functions specified in Section 3.3 were designated as an "LF" in the DOC. The acceptance of these changes is not included in the SE.

In Sections 3.6 and 3.8 of the SE, each LCO subsection lists the CTS and each ITS section into which it had been incorporated. The other sections of the SE did not include this. For consistency, this should be deleted from Sections 3.6 and 3.8.

In Section 3.6, subsection e, "Significant Differences from STS," the reviewer provided justifications of deviations from NUREG 1433 (for BWR-4). The Supply System submittal was based on differences from NUREG 1434. The Supply System comments on the SE are also based on a comparison with NUREG 1434.

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SPECIFIC COMMENTS

In Section ITS-OBP, page 7, changes are categorized as Types 1 through 9. Although changes corresponding to these categories were made throughout the submittal, the SE only used the designation consistently in ITS Section 3.4, 3.5, and 3.9; occasionally in ITS Sections 3.6 and 3.8; and it was not used in ITS Sections 3.7, 3.10 or 4.0.

In Reference 6, the NRC rejected the Technical Specification Task Force (TSTF) 31 submitted by Nuclear Energy Institute (NEI) as a proposed change to the STS. The Supply System requested the use of this TSTF to change two examples of Completion Times in Section 1.3 of the ITS submittal. Subsequent to the letter to NEI, the Supply System was informed that the staff would also reject the use of the TSTF-31 by the Supply System. The two changes were proposed by NEI and the Supply System because Examples 1.3-3 and 1.3-6 of the STS were not representative examples of completion times found in NUREG 1434 or the WNP-2 ITS. In Section ITS 1.0 d, page 5, the generic change TSTF-31 is accepted as a plant specific change. However, in ITS 1.0 a.1.3, page 3, the same change is identified as an open item.

Example 1.3-3 is provided to show how the combined allowable outage time (AOT) for two functions is limited to prevent indefinite continued operation with the LCO not met. However, the combined Condition C in the example has the same AOT as Condition B and would therefore never be more restrictive than Condition B. The Supply System proposed that the AOT for Condition C be reduced to 12 hours to emphasize the restriction of two functions being inoperable.

Example 1.3-6 shows the user how to track completion times if the Required Action contains options. One of the options provided in Example 1.3-6 requires that the reactor power be reduced to less than 50% within 8 hours. Failure to comply with the Required Action within the stated Completion Time requires that Condition B be entered. The required Action B.1 is to enter MODE 3 within 12 hours. Application of the example shows that if the operator did not reduce power below 50% then the plant would have to be brought to MODE 3 within the next 12 hours. However, in reducing the power to enter MODE 3, the plant would be below 50%, satisfying Action A.2 and therefore the operator would not be required to complete Action B. The Supply System proposal changed Example 1.3-6 Action A.2 to tripping a channel to provide a realistic example to the operators.

The changes to the two examples do not represent a safety issue for WNP-2 operation. They do represent an enhancement to the ITS that would preclude confusion. In Reference 6, the staff suggested that TSTF be resubmitted, without stating why the TSTF was rejected. Resubmitting the TSTF and subsequent approval by the staff will require additional cost to the Supply System

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and delay of the Technical Specifications change request to include the enhancement and remove the confusing examples. However, in the interest of expediency, Revision C will include the examples as provided in the STS.

The Supply System proposes an editorial change in Section ITS 2.0 a, page 1. The section of the SE does not include a discussion for every change proposed; only those considered significant are discussed. This same proposed editorial change was made to each ITS subsection discussion of administrative changes.

The evaluation in Section ITS 3.0 c, SR 3.0.3 - L.4, page 11, discusses the more restrictive and administrative changes discussed in the L.4 DOC. Because L.4 also contains less restrictive changes, the SE was edited to clarify the more restrictive requirements and to discuss the less restrictive change proposed.

In Section 3.4.9 of the SE (SE ITS 3.4, pg 14), DOC A.1 was evaluated as a less restrictive change. This DOC deleted a frequency increase for a surveillance requirement from the action statement CTS 3.4.5, Action c. It was evaluated by the staff as a less restrictive change because it removed the requirement to perform the surveillance if reactor thermal power was changed by 15%. This is not a requirement. In accordance with CTS LCO 3.0.1, failure to meet an LCO requires that the Action Requirements shall be met. In accordance with CTS LCO 3.0.2, if compliance with the LCO is restored, the Actions do not have to be completed. Therefore, if the LCO is met, there is no requirement to perform the action. The CTS 3.4.5, Action c does not require the increase in surveillance frequency when the LCO is met and reactor power has changed by 15%. The increase in surveillance frequency upon failure to meet the LCO is included as Action A and B of ITS 3.4.9. The Supply System maintains this is an administrative change consistent with the ITS evaluations performed previously by the staff. This issue is discussed in more detail in the Supply System response to the Notice of Violation in NRC Inspection Report 96-03. (Letter GO2-96-116, dated June 10, 1996.)

In Section ITS 3.8 b, 3.8.6 (L.2), page 26, the reviewer rejected the addition of the phrase "and following" to Note (a) saying that the Bases adequately explain what is meant by "during." The temporary increase above the specified limit during an equalizing charge is acceptable. The Supply System added the phrase "and following" to the note in the ITS because the temporary increase may last for 24 hours or longer. The Supply System maintains that adding a statement in the Bases, that during also means that the temporary increase is acceptable for a period of time following the completion of the equalizing charge changes the intent of the surveillance in the Bases. As this change is inconsistent with the Bases Control Program and expected to be the subject of future ITS literal interpretation scrutiny, the Supply System requests the reinstatement of the phrase "and following" to Note (a).

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In Section ITS 3.8 d, 3.8.7 (JFD 26), page 41, the reviewer rejected the proposed deletion of the Note to the Actions of STS 3.8.9. The Supply System proposed the note because of the potential confusion. The note allows an exception to the LCO, action, and surveillance requirements for the Division 3 distribution subsystem when HPCS is inoperable. The Condition F adequately addresses this situation, by requiring the HPCS be declared inoperable when the distribution subsystem is inoperable. If HPCS is inoperable when the distribution subsystem is found to be inoperable, no additional action is required. However, if HPCS is operable when the distribution subsystem is inoperable, the operator must immediately declare HPCS inoperable. At that time, the LCO 3.8.7 (STS 3.8.9) is no longer applicable; Condition F is not applicable, Action F.1 is not required. As indicated by the reviewer, this is not the intent of the note. However, deletion of the note removes the potential for the confusion and does not impact the provisions of 3.8.7, 3.8.1, or 3.0.6. Also, LCO 3.8.4, for DC Sources includes a Condition and Action for an inoperable Division 3 support system for HPCS, but does not include a note similar to the exception in STS 3.8.9. To maintain consistency within the WNP-2 ITS and to avoid confusion by the operators, the Supply System requests that the staff reconsider this deviation from the STS.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
1.0, A.12 (SE ITS-1.0, pg 4)	DOC reclassified.	Deleting the actuated device from LSFT was seen as a less restrictive change.	The SS proposed it as an administrative change, because if, in CTS, a valve is declared inoperable and will not open, the control instrumentation loop that sends open/close signals to the valve is not declared inoperable. The change clarifies current practices.
1.0, A.10 (Item 57) (SE ITS 1.0, pg 2)	Change definition of Isolation Response Time	The time must reference the entire System Response, excluding the DG times.	Rev C will return "System" to definition. Rev C will also include discussion in Bases that failure to meet Response Time due to slow valve stroke does not require that the instrumentation channel be declared inoperable.
1.3, TSTF-31 (Item 59) (SE ITS 1.0, pg 3)	Change Completion Time examples to reflect actual examples in the TS.	NRC rejected TSTF-31	The STS examples will be submitted in Rev C.
3.0.5, L.2 & TSTF-01 (SE ITS 3.0, pg 11)	Added the phrase "or variables to be within limits"	Verbally indicated that it would not be accepted. However, SE isn't clear if change is acceptable.	Need additional clarification from the staff if TSTF-01 is not acceptable.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.3, LF.1 (Item 6) (not in SE)	Discussion in Bases relative to Allowable Values with an upper and lower limit.	Add to Bases, that setpoint methodology was applied to the upper and lower limits.	Request NRC pursue as a generic issue. Will add proposed phrase to Bases of 3.3 in Rev C.
3.3.1.1, A.3, (SE ITS 3.3, pg 1, 17, & 19)	Added a note to allow the design sensor response time to be used in determination of response time, in accordance with NEDO-32291.	Evaluated as a less restrictive change.	Consistent with GL-93-08, the SS has removed the required response times from the Tech Specs and subsequently implemented the use of the staff reviewed and approved design sensor response time methodology, in accordance with 10CFR50.59. Including this note in the ITS reflects an administrative change to CLB.
3.3.1.1, JFD-1 (Item 25) (SE ITS 3.3, pg 76)	Maintain AOT of 12 hours for manual RPS channels inoperable.	NRC rejected the request.	AOT will be changed to 1 hour in Rev C.
3.3.1.2, JFD-42 (SE ITS 3.3, pg 75)	Added a note to delay performance of SR 3.3.1.2.5.	NRC accepted the request.	The SS will submit a TSTF change package for industry consideration.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.3.2.1, 3.3.5.1, A.2 & 11 (Item 30) (SE ITS 3.3, pg 4 & 10)	Delete CFT SR because it is included, by definition in the CC SR.	NRC rejected the request.	CFT will be added in Rev C.
3.3.2.2, A.2 (SE ITS 3.3, pg 34)	Deleted portions of CTS 3.3.9 Action a. because it was redundant to Action b.	Evaluated as a less restrictive change.	CTS 3.3.9 Action b. allows a 7 day AOT. Action a. requires placing the channel in trip but does not specify a time. Entry into Action a. would also require action into Action b. which allows 7 days for restoration of the channel. Because tripping the channel before 7 days is not required by Action a, it is redundant to Action b. and the deletion is considered administrative.
3.3.3.2, 3.3.8.2, L.2 & 3 (Item 47 & 99) (SE ITS 3.3, pg 37 & 56)	Delay entry into ACTIONS for 6 hours for Remote Shutdown and RPS-EPAs.	Requested additional information to support request.	Additional information will be provided in Rev C.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.3.4.2, M.3 (Item 54 & 55) (SE ITS 3.3, pg 60)	Maintain 14 day AOT for one channel inop.	WNP-2 differs from STS assumed design. The 14 day AOT is not acceptable.	AOT will be reduced to 7 days in Rev C.
3.3.5.1, M.6 & M.7 (SE ITS 3.3, pg 62)	Requirements added to ITS.	Evaluated as a less restrictive change in 3.3.b. A & B.	Additional requirements should be considered more restrictive changes.
3.3.6.1, A.3 (SE ITS 3.3, pg 11, 17, & 19)	Added a note to allow the design sensor response time to be used in determination of response time, in accordance with NEDO-32291. Deleted reference to RTT SR, when RTT corresponded to DG start time.	Evaluated as a less restrictive change.	Consistent with GL-93-08, the SS has removed the required response times from the Tech Specs and subsequently implemented the use of the staff reviewed and approved design sensor response time methodology, in accordance with 10CFR50.59. Including this note in the ITS reflects an administrative change to CLB.
3.3.6.1 L.4 (Item 113) (SE ITS 3.3, pg 45)	Deletion of the RCIC/RHR high flow isolation signal.	SE describes as OPEN	The portion of the system protected by this signal has been deactivated. The signal is not needed in ITS.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.3.6.1, M.3 (SE ITS 3.3, pg 13)	Added that 2 channels, rather than 1 channel, were required to be operable. Other portions of this change were administrative.	Evaluated as an administrative change.	CTS requires 1 channel per trip system, this was recognized to contain 2 channels (the push and the switch channel). The ITS requires that both push buttons be operable (2 buttons, each with 2 channels). This is a more restrictive change.
3.3.6.1, M.4 (Item 77) (SE ITS 3.3, pg 63)	Added isolation functions for RWCU	SE describes as OPEN	Submitted as CTS and ITS change.
3.3.6.1, M.6 (SE ITS 3.3, pg 63)	Decreased the allowable value.	Evaluated as a less restrictive change.	The decrease in the AV is a more restrictive change on operations.
3.3.6.1, R.1 (Item 63)	Relocate the high drywell signal to isolate RCIC-V-110 and V-113.	NRC rejected the request.	The signals will be retained in the ITS, while the resolution of the containment isolation valves is discussed.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.3.6.2, A.3 (SE ITS 3.3, pg 14, & 19)	Deleted reference to RTT SR, when RTT corresponded to DG start time.	Evaluated as a less restrictive change.	Consistent with the GL-93-08, the SS has removed the required response times from the Tech Specs and subsequently implemented the use of the staff reviewed and approved design sensor response time methodology, in accordance with 10CFR50.59. Including this note in the ITS reflects an administrative change to CLB.
3.3.6.2, A.4 (SE ITS 3.3, pg 14)	The direct reference to shutdown was deleted from Action 24 of CTS 3.3.2.	Evaluated as a less restrictive change.	In CTS, failure to close the valve or to declare the system inoperable would require a plant shutdown. In ITS Required Action C does not list plant shutdown, however, failure to isolate or declare the system inop, would be a violation of ITS and would require a shutdown. Therefore, CTS Actions and ITS Actions require the same action and the change is administrative.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.3.8.1, L.1 (Item 93) (SE ITS 3.3, pg 54)	Reduce the number of channels required for the loss of voltage function to 1.	NRC rejected the request, based on CLB.	Revision C will return the number of channels required to be operable to 2, but will add a 72 AOT for one inoperable. The AOT for one inoperable is conservative because, with one of the two loss of power relays inoperable, the loss of power function is still maintained by the remaining relay. However, in CTS, entry into the condition requires that the associated DG be declared inoperable.
3.3.8.2, JFD 2 (Item 97) (SE ITS 3.3, pg 75)	Change the LCO because the RPS powers the RHR SDC isolation signal.	NRC accepted the request.	The SS will submit a TSTF change package for industry consideration.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.4.7, (3.4.6 in Rev C) A.1 (SE ITS 3.4, pg 3)	The specified pressure range of 950 ± 10 psig was changed to reflect the maximum pressure differential required by the ASME code.	The NRC has requested that a pressure range for the SR be specified as in the STS.	As stated in paragraph 4.2.2.3 of OM-10, and NUREG-1482 the licensee should ensure that each PIV is individually leak tested in accordance with the "function maximum pressure differential" (FMPD) requirements of the Code. If the pressure range imposed in the SR does not satisfy this requirement the licensee is allowed to adjust the results by using a calculation discussed in OM-10 paragraph 4.2.2.3(b)(4). The SS specified in the SR that the equivalent leakage at 1035 psig must be less than the limit. If specified in this way, the SR would satisfy both the TS and the Code. Specifying 935 ± 10 psig would require that most test results be adjusted using the calculation rather than testing the valves at the FMPD as described in the ASME Code. Reliance on the calculation verification adds an unnecessary level of complexity, removes direct compliance with ASME Code requirements, that does not increase public safety or provide additional assurance of equipment operability.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.4.7, LA.2 (3.4.6 in Rev C) (SE ITS 3.4, pg 4)	Changing the specified frequency to reflect the IST program.	The SE describes this as an administrative change because the ASME Code and the CTS each specify an 18 month interval.	The CTS and the IST program each specify an 18 month frequency. However, the Code specifies 24 months or less. Relocating the frequency to the IST program is a less restrictive change because the frequency may be changed without prior NRC approval.
3.4.9, A.1 (SE ITS 3.4, pg 14) (3.4.8 in Rev C)	Deleted frequency increase for surveillance requirement from the action statement CTS 3.4.5, Action c.	Evaluated as a less restrictive change because it removed the requirement to perform the surveillance if RTP was changed by 15%.	If the LCO is met, there is no requirement to perform the action of increasing the surveillance frequency. Therefore this is an administrative change. See Attachment 5.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.4.12, A.6 (SE ITS 3.4, pg 17) (3.4.11 in Rev C)	Deleted the limit on temperature differential between idle loop and operating loop.	Evaluated as a less restrictive change.	CTS 4.4.1.1.2.b requires that the temperature difference between the idle loop and the RPV coolant be $\leq 50^{\circ}$ F. CTS 4.4.1.1.2.c requires that the difference between the idle loop and the operating loop be $\leq 50^{\circ}$ F and was not included in the ITS. The instrumentation used to perform both SRs (idle to RX coolant and idle to operating loop) is physically located in the recirc loop piping. The RPV coolant and the operating loop coolant are the same coolant. Therefore deleting the SR 2.c and retaining SR 2.b is an administrative change.
3.5.1, M.1 (SE ITS 3.5, pg 9)	Added the requirement to functionally test the back up compressed gas system.	CTS 4.5.1.e.3 requires an ADS functional test. The staff requested additional information.	The ADS system could satisfy CTS 4.5.1.e.3 without challenging the functions of the backup system. The backup system provides long term air supply and the function should be tested.
3.5.1, L.3 (SE ITS 3.5, pg 5)	Extension of AOT for ECCS	The NRC rejected the request.	The request will be withdrawn in Rev C.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.5.3, LD.1 (SE ITS 3.5, pg 9)	Extend 2 RCIC SRs to 24 months.	The NRC rejected the request based upon recent RCIC test history.	Additional information to justify the extension is provided in Attachment 4.
3.6.1.3, L.5 (SE ITS 3.6, pg 21)	Added the allowance to administratively control opening isolated PCIVs.	This is allowed by LCO 3.0.5 and should be classified as an administrative change.	LCO 3.0.5 allows valves to be opened to demonstrate operability. This note does not restrict the administrative opening to testing and is therefore less restrictive.
3.6.1.3, JFD 8 (SE ITS 3.6, pg 43)	Modified the description of Condition A.	The NRC rejected the request.	This is discussed as Item 3 in Attachment 1.
3.6.1.5, R.1 (SE ITS 3.6, pg 43)	Relocation of wetwell spray requirements to LCS.	Requested information relative to chugging and bypass events.	Information provided in Attachment 3.
3.6.1.6, M.1 (SE ITS 3.6, pg 8)	Reduced the time (in CTS 3.6.4.2 Action b.) to close the second open vacuum breaker from 2 hours to 1 hour before requiring a plant shutdown.	Evaluated as an administrative change because 2 open vacuum breakers required an entry into 3.0.3, because no applicable action requirement was provided.	CTS Action b requires that if it can not be verified within 2 hours that the second vacuum breaker is closed then the plant be in hot shutdown in 12 hours and cold shutdown within the following 24. Because CTS allows 2 hours prior to initiating a shutdown and ITS allows only 1 hour, this is a more restrictive change.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.6.1.7, LA.1 (SE ITS 3.6, pg 8)	Details of the design and installation of the vacuum breakers was moved to the Bases.	Evaluated as a administrative change, seen as a change in nomenclature.	The discussion in the Bases is provided to clarify the "nomenclature" of the vacuum breaker installation. However, there are other aspects related to the number installed and what defines OPERABILITY. Therefore the change was classified as less restrictive.
3.6.1.7, A.3 (SE ITS 3.6, pg 9 & 25)	Added "Separate Condition entry is allowed for each suppression chamber-to-drywell vacuum breaker."	Evaluated as a less restrictive change because no action for an open vacuum breaker in more than one pair was provided and therefore 3.0.3 entry is required.	There is no restriction in CTS which would prevent the entry into CTS 3.6.4.1 Action c. for each vacuum breaker pair that had one of the pair open. With the other one in each pair closed the availability of the suppression pool for pressure suppression is maintained and the plant can be operated within the design analyses. Therefore, inclusion of this note, in accordance with the STS format is an administrative change.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.6.1.7, A.4 (SE ITS 3.6, pg 9 & 17)	Reformatted actions within CTS 3.6.4 Action c.	Evaluated as a less restrictive change because the requirement in CTS 3.6.4 Action c, to verify the second vacuum breaker, in a pair with one of the pair found to be open, was deleted for ITS.	CTS 3.6.4 Action c. requires that if the second vacuum breaker in a pair is found to be open, the plant must be shutdown within 12 hours. ITS 3.6.1.7, Action C.1 requires that the second open vacuum breaker within a pair be closed within 2 hour or Action D.1 requires that the plant be shutdown within 12 hours. When an LCO is not met, the Condition must be entered and the Required Actions taken. Failure to verify a second in a pair is closed (Condition C), requires the condition be exited within two hours or a shutdown initiated. Because the action (close both in a pair) and the specified time (2 hr) were unchanged this should be regarded as an administrative change.
3.6.2.1, L.2 (SE ITS 3.6, pg 29)	Changes to CTS 4.6.2.1.b.	The scope of L.2 is not clear and CTS 4.6.2.1.b.3 is not addressed.	L.2 is applicable to CTS 4.6.1.b.3. With the proposed change D.3 is consistent with CTS 4.6.2.1.b.3.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.6.2.1, M.1 (SE ITS 3.6, pg 39)	Removed position of the MSIV from consideration of suppression pool operability	Clarification requested for the more restrictive classification.	This is more restrictive because in CTS the suppression pool would not be declared inoperable if the temperature was greater than 120 F and the MSIVs were open. ITS will require the suppression pool be declared inoperable, regardless of MSIV position.
3.6.2.3, L.1 (SE ITS 3.6, pg 30)	Requested an 8 hour AOT with 2 subsystems inoperable	The NRC rejected the request, suggesting that the request be proposed generically.	The request will be withdrawn in Rev C. However, the SS noted that the BWRs with approved ITS conversions had the 8 hour AOT.
3.6.4.3, A.4 (SE ITS 3.6, pg 14)	Relocation of instrumentation LSFT to LCO 3.3.6.2	Clarification of the SR location requested.	The LSFT for secondary containment isolation and SGT initiation is specified in SR 3.3.6.2.4.
STS 3.6.1.4, JFD 14 (SE ITS 3.6, pg 41)	Relocation of containment pressure LCO.	Requested location of negative pressure limit in ITS.	The negative pressure limit of the vacuum breakers is specified in SR 3.6.1.7.3, assuring the negative pressure limit of the containment is not exceeded.

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.7.1, L.1 (Item 100) (SE ITS 3.7, pg 5)	Requested extension of AOTs.	The NRC rejected the request.	The request will be withdrawn in Rev C.
CTS 3.7.4, LA.1 (Item 108) (SE ITS 3.7, pg 13)	Relocation of the snubber requirements.	a) The NRC requested the proposed new location. b) The NRC evaluation stated that the Licensee had evaluated the relocation against the criteria of 10CFR50.36.	a) Revision C will identify the proposed location as the LCS. b) The SS did not justify the relocation of the snubber program by the application of the criteria of 10 CFR 50.36.
CTS 3.7.5, R.1 (SE ITS 3.7, pg 14)	Relocation of sealed source requirements.	The NRC requested the proposed location.	Revision C will identify the proposed location as the LCS.
CTS 3.7.8, R.1 (SE ITS 3.7, pg 14)	Relocation of area temperature requirements.	The NRC requested the proposed location.	Revision C will identify the proposed location as the LCS.
3.8.1, JFD 12 (SE ITS 3.8, pg 38)	Relocated the power factor limits from the SR to the Bases.	The NRC has not accepted this deviation.	The SS will maintain the PF in the Bases. Discussion is provided in Attachment 2.

RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

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DOC	ISSUE	NRC POSITION	SS RESPONSE
3.8.1, L.3 (SE ITS 3.8, pg 12)	Extended AOTs for DGs.	The NRC rejected the request.	The request will be withdrawn in Rev C.
3.8.2, L.1 (SE ITS 3.8, pg 18)	Extended AOTs for DGs.	The NRC rejected the request.	The request will be withdrawn in Rev C.
3.8.2, All SRs (SE ITS 3.8, pg 40)	Added a note that 3.0.3 is not applicable.	The request was denied because 3.0.3 is not applicable in MODES 4 and 5.	The note was added because fuel movement (the second applicability of the LCO) may occur during MODES 1, 2, or 3.
3.8.4, L.7 & 8 (SE ITS 3.8, pg 25)	Allow the performance of SR 3.8.4.7 to meet SR 3.8.4.8 in 60 months	Reviewer questioned classification as less restrictive.	Although the discharge test may be more severe, performing the test to satisfy service test requirement is not currently allowed.
3.8.4, LA.4, JFD 23 (SE ITS 3.8, pg 22)	Relocation of the details of the battery charger load test to the Bases.	NRC rejected the request.	The detail of the load values will be included in Rev C, added to the Bases as discussed with the staff. The test proposed by WNP-2 is different from the STS and the CTS but represents a more suitable test of the operability of the equipment.

RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

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OPEN ITEMS AND PROPOSED RESOLUTION

DOC	ISSUE	NRC POSITION	SS RESPONSE
3.8.5, All SRs (SE ITS 3.8, pg 41)	Added a note that 3.0.3 is not applicable.	The request was denied because 3.0.3 is not applicable in MODES 4 and 5.	The note was added because fuel movement (the second applicability of the LCO) may occur during MODES 1, 2, or 3.
3.8.6, L.2, JFD 25 (SE ITS 3.8, pg 41)	Table 3.8.6-1 includes a note allowing a temporary increase in electrolyte level "during" equalizing. L.2 added the word "following" to the note.	The NRC rejected the addition of "following," saying this allowance is adequately addressed in the Bases.	The SS added "following" to the ITS because adding this allowance in the Bases appeared to be changing the intent of an SR in the Bases. The SS requests the staff reconsider the rejection. See discussion in Attachment 5.
3.8.7, A.2 (SE ITS 3.8, pg 7 & 27)	Added Condition F requiring entry into 3.0.3.	Evaluated as both a less restrictive and a more restrictive change. The reviewer identified that CTS 3.8.3 did not contain adequate direction on appropriate actions if 3 subsystems were found to be inoperable.	CTS 3.8.3 provides action requirements if either Div 1 or Div 2 subsystems are inoperable and if Div 3 subsystems are inoperable. If more than 2 AC or more than 2 DC subsystems are inoperable, CTS would require entry into 3.0.3.
3.8.7, JFD 26 (SE ITS 3.8, pg 41)	Deleted the note in applicability relative to Div 3.	The NRC rejected the request indicating that the example of potential confusion noted by the licensee was not compelling.	The SS believes the note is unnecessary and confusing. See Attachment 5 for discussion.

RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

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OPEN ITEMS AND PROPOSED RESOLUTION

DOC	ISSUE	NRC POSITION	SS RESPONSE
3.9.1, JFD 7 (SE ITS 3.9, pg 15)	Modified the LCO and Applicability to align with CLB	Under review by technical staff.	The SS has provided additional information which should resolve the reviewer concerns.
4.0, JFD 3 & 5 (SE ITS 4.0, pg 3, 4)	Deleted limits for enrichment for new and stored fuel	Open item.	The SS has been informed that the NRC will accept the proposed deviation.
5.5.7a-e, A.9 (SE ITS 5.0, pg 4)	ITS references to codes and standards	The NRC has requested additional information.	The information will be provided and necessary changes reflected in Rev C.
5.6 & 5.7, JFD 13 (SE ITS 5.0, pg 18)	Changes needed for Part 20 changes.	The NRC has provided additional guidance.	Rev C will contain the changes requested to 5.5.4, 5.6.1, and 5.7.
5.5.9, JFD 24 (SE ITS 5.0, pg 19)	Added "with procedures based on" to testing program standard.	The NRC has requested a letter explaining any differences anticipated between the ASTM standard and the testing procedures.	The phrase will be removed in Rev C. The phrase had been added to clarify that, during the performance of the test, procedures, rather than standards would be referenced. There was no intent to deviate from the standards.

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RESPONSE TO DRAFT SAFETY EVALUATION OF PROPOSED IMPROVED TECHNICAL SPECIFICATIONS

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DOC	ISSUE	NRC POSITION	SS RESPONSE
5.5.9a3c, JFD 24 (SE ITS 5.0, pg 19)	Deleted the reference to ASTM-D-2276.	The reference should be retained because it is applicable to aviation fuel.	The reference to the ASTM standard was retained in the Bases for SR 3.8.3.3, in accordance with the NUREG. Retaining reference to the specific standard is inconsistent with the ITS. Specific standard references were placed in the Bases to allow the licensee control per the Bases Control Program change process. The change flexibility would be lost if the reference were retained in the ITS.
5.5.9, JFD 25 (SE ITS 5.0, pg 20)	Changes to reflect CLB.	NRC unsure about translation of CLB to ITS.	Will schedule a conference call to clarify question prior to completion of Rev C.
5.7, JFD 30. (SE ITS 5.0, pg 20)		NRC requested additional information concerning options on using a guard or locked door.	A guard is used when a locked door is not appropriate. The SS will discuss the question with the staff to assure the necessary information is provided.